

- 7.5. Simultaneous operations plan;
- 7.6. Drilling application;
- 7.7. Sundry notice application;
- 7.8. Secondary recovery plan;
- 7.9. Application to abandon a well;
- 7.10. Application for structures and equipment;
- 7.11. Application to construct pipelines.

The items on the list are in the main self-explanatory; plans are filed showing intentions and certain operations need specific approval prior to being carried out. For example, the exploration plan (7.1) will contain information on the location of the well, its depth, the geological interpretation of the area but a Drilling Permit is required (7.6) before starting the well. Items 7.4 and 7.5 cover respectively, more inherently risky operations which may need limitations under certain circumstances and the plan to conduct specific operations simultaneously with oil production.

8. The Geological Survey also has requirements about training and qualifications of personnel for well control; safety devices and cranes. New employees have to have an induction course.

9. *The US Coast Guard (USCG)*. The OCS Lands Act 1953 also gave the USCG certain responsibilities in relation to navigation lights and other warning devices, safety equipment and related matters on fixed offshore installations. The Coast Guard also is responsible for regulation of commercial diving offshore, the co-ordination of pollution clean up, and for the certification of mobile drilling units.

10. The Coast Guard have issued regulations on navigation aids, personnel and installation safety. These latter cover inspections, means of escape, life saving appliances, fire fighting equipment, alarms, drills, accident reports and investigation and station bills. Regulations for all commercial diving on the OCS have been made and require the appointment of a "person in charge" and a "diving supervisor" prior to operations starting. Their responsibilities respectively are the safety of the vessel (or facility) from which diving is taking place and the planning and safe execution of diving operations. Regulations for mobile drilling units cover the design, certification, operation and equipment of all mobile drilling units. The Coast Guard in these relatively recent (1978) regulations brought all drilling units into its purview whereas previously only floating units were subject to its jurisdiction.

11. Enforcement is by (usually) annual inspection; there are penalties for non-compliance.

12. *Occupational Safety and Health Administration (OSHA)*. The Occupational Safety and Health Act was passed in 1971 setting up OSHA as part of the Department of Labor. The Act sets out a general duty on employers to provide safe employment and safe working environment. OSHA has issued two types of regulation: the first is procedural and the second is related to particular industry standards to be met.

13. The regulations are enforced by OSHA inspectors and penalties exist for violations. Accidents must be reported to OSHA and if appropriate will be investigated.

14. *Materials Transportation Bureau (MTB)*. The MTB is a Bureau within the Department of Transportation and its regulations cover the specification, construction and operation of pipelines used to transport gas or hazardous liquids. In 1975 the MTB extended the application of its regulations to offshore gathering lines, previously only covered by USGS regulations. The two Departments subsequently entered into a Memorandum of Understanding to minimise conflict and confusion of responsibility.