

## **Attachment C**

### **Draft Comments on Proposed Regulations By the Minerals Management Service**

**SALUD CARBAJAL**

First District

**JANET WOLF**

Second District, Vice Chair

**DOREEN FARR**

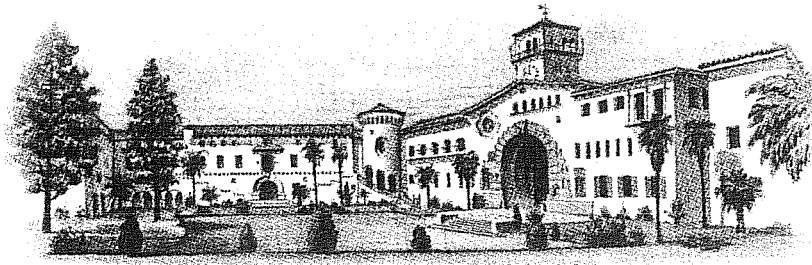
Third District

**JONI GRAY**

Fourth District

**JOSEPH CENTENO**

Fifth District, Chair



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## COUNTY OF SANTA BARBARA

September 1, 2009

Minerals Management Service  
Attention: Regulations and Standards Branch (RSB)  
381 Elden Street, MS-4024,  
Herndon, Virginia 20170-4817.

RE: Safety and Environmental Management Systems (“SEMS”) for  
Outer Continental Shelf Oil and Gas Operations, 1010-AD15

To Minerals Management Service:

The County of Santa Barbara submits the following for consideration in developing the Final Rule for SEMS programs.

We support Minerals Management Service (MMS) in requiring OCS oil and gas operators to implement SEMS rules, which are intended to reduce human error and organizational failures. Experience offshore Santa Barbara County illustrate that human error or organizational failures are important contributing causes, if not the primary cause, of most incidents both onshore and offshore Santa Barbara. Even incidents for which the reported cause is corrosion, mechanical failure, and other types of equipment failure are usually preventable by rigorous procedures, training, oversight of subcontractors, and preventive maintenance programs. Therefore, it is important for MMS to adopt the SEMS regulations, and consider the following comments.

The four SEMS program elements required in the Proposed Rule are *Hazards Analysis*, *Management of Change*, *Operating Procedures*, and *Mechanical Integrity*. The analysis summarized in the Proposed Rule indicates that these elements are associated with contributing causes of most incidents, hence the rationale for focusing on them. However, analysis does not examine whether the excluded SEMS elements are also associated with important contributing causes. These elements include *Safe Work Practices*, *Training*, and *Emergency Response and Control*. It is not clear to us whether the Proposed Rule goes far enough to address the contributing causes of most incidents or whether some of the excluded elements should be included for the program to be effective.

The Proposed Rule notes that most large OCS operators already have SEMS programs. However, no analysis is provided documenting the frequency and severity of incidents for operators that have SEMS and those that do not. Accordingly, performance measures by which the MMS would evaluate the effectiveness of SEMS, and well as future process improvements, appears to be crucial to ensure the programs are developed and implemented adequately. The MMS should report publicly on the results of such evaluations, including a clear baseline and performance criteria for the individual SEMS programs.

Please contact John Day of the County's Energy Division at (805) 568-2045 if you have questions.

Sincerely,

Joseph Centeno  
Chair

CC: Rishi Tyagi, District Supervisor, Minerals Management Service, Pacific OCS Region  
Alison Dettmer, California Coastal Commission  
Greg Scott, Division Chief Minerals Resources, California State Lands Commission