



United States Department of the Interior

MINERALS MANAGEMENT SERVICE
Washington, DC 20240



CERTIFIED MAIL
RETURNED RECEIPT REQUESTED

APR 22 2009

Dr. Lee Hunt
President – International Association of Drilling Contractors
10370 Richmond Avenue, Suite 760
Houston, Texas 77042

Dear Dr. Hunt:

The Minerals Management Service (MMS) and the U.S. Coast Guard (USCG) continue to have significant concerns about the safety of Outer Continental Shelf (OCS) lifting operations.

Since February 2006, the MMS has issued seven Safety Alerts to address OCS lifting operations. We have worked cooperatively with industry organizations, operating companies, contractors, and manufacturers to better understand the high number of lifting incidents on the OCS, and to prevent their recurrence. These efforts have included:

- 1) Participation in both domestic and international lifting conferences;
- 2) Increased focus on obtaining more accurate lifting incident data through better onsite investigations;
- 3) Increased distribution of lifting incident, injury, and fatality data to industry through postings on our websites;
- 4) Better in-house analysis of lifting incident data with subsequent sharing of this information between MMS and USCG, and with industry at conferences and meetings;
- 5) Participation in standards development work;
- 6) Formation of the International Regulators Forum lifting work group;
- 7) Updating MMS regulations in 30 CFR 250.108 and USCG regulations in 46 CFR Subchapter I-A; and
- 8) Creation of a “standing” Lifting Safety Subcommittee.

Despite these efforts, OCS lifting operations continue to be unacceptably dangerous. There have been twenty-four fatalities from lifting operations since 1995. Over the same timeframe, 269 workers have been injured during these operations. Currently, lifting incidents account for approximately 20 percent of all OCS fatalities and injuries. Just this month, one employee was killed and another injured while lowering a high pressure hose with an air hoist on a fixed facility. In February 2008, two were killed when a crane boom failed on a mobile offshore drilling unit.

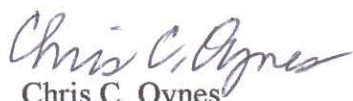
We would appreciate feedback regarding your plans for improving the safety of offshore lifting operations, and request your responses by May 22, 2009. In the interim, we intend



to thoroughly evaluate the lifting regulations found in 30 CFR 250.108 and 46 CFR Subchapter I-A to determine if changes to these regulations are needed. We will also consider changes to both agencies' inspection and enforcement policies to help achieve better lifting safety results.

Thank you for your attention to this matter. If you have any questions, do not hesitate to contact us.

Sincerely,



Chris C. Oynes
Associate Director, for Offshore
Energy and Minerals Management



Brian M. Salerno
Rear Admiral, U.S. Coast Guard
Assistant Commandant for Marine,
Safety, Security and Stewardship

