

## REPORTING THRESHOLDS OF MMS PROPOSED AND CURRENT REGULATIONS—Continued

[illegible]

### 5. Reporting Procedures (§ 250.190)

Except for oil spills, current MMS regulations do not require submission of written incident reports. Since written reports would be required under this proposed rule, we have included procedures for the timing, method, and format for these reports. Written reports must be submitted electronically. We are working with the USCG to develop an electronic reporting system that would allow lessees/operators to submit reports to both agencies through a single point.

- “Immediate” Reporting Category (§ 250.188). This category includes incidents that must be reported to both agencies. MMS and the USCG have worked together to make the reporting procedures as consistent as possible with the USCG proposed rule for these incidents. Most incidents listed in this section require immediate oral notification to both MMS and the USCG. This dual notification is essential so each agency can determine what immediate response, investigation, and coordination is needed. Written Follow-up Reports for most incidents in this

category would be required. Some Follow-up Reports must be submitted to MMS and some to both MMS and the USCG. Written Final Reports must be submitted to MMS for the most serious incidents in this category.

Current USCG regulations require submission of written reports either in a narrative form or on their existing form CG-2692. Form CG-2692 provides some of the information that MMS needs, but not all. We have developed a new form, MMS-142, to supplement form CG-2692. Form MMS-142 is divided into four sections. For incidents where Follow-up Reports must be submitted to MMS or to both agencies, submission of a form CG-2692 and form MMS-142 (sections 1-3) is required.

We would require a complete form MMS-142 (sections 1-3), if required. We would require a complete form MMS-142 (sections 1-4) for incidents for which you must submit a Final Report to MMS. Company reports may be used to substitute for the Final Report if they contain the information requested by form MMS-142.

The USCG NPR proposes a new form, CG-RMAID, to submit written reports for fixed and floating facilities. We have not incorporated this form for incident

reporting because it is still a proposed form subject to final USCG regulations. We may be ready to finalize our incident reporting rule before the form CG-RMAID is approved for use. Also, as recommended by NOSAC, MMS will continue to work with the USCG to develop a single incident reporting form for incidents that are of interest to both agencies. Although most of the information requested by form MMS-142 is not duplicative of information requested by form CG-2692, both agencies agree that a single incident reporting form will provide more efficient data submission for the regulated community and data collection and analysis for the agencies. Before developing a joint incident reporting form, both MMS and the USCG would like to consider comments we receive about the incident reporting requirements in our respective proposed rules.

• “12-Hour” and “15-Day” Reporting Categories. Incidents listed in §§ 250.189(a)(1)—250.189(a)(8) are reported only to MMS. No oral notifications are required. For incidents listed in §§ 250.189(a)(1)—250.189(a)(4),