Comments on BSEE-2011-0006

**Government Business Interface**

About a decade ago, BSEE predecessor, MMS started an eGov project in part to automate the interface between the government and the operators on the OCS. This project was known as OCS Connect. That project failed to deliver on its objectives for a variety of reasons, such as Hurricane Katrina. BSEE needs to get back to automating this interface. The concept is already working with the successful eWell program. BSEE needs to move from a paper based to an electronic, secure, and reliable system. The OCS operators are very sophisticated. They conduct 3D seismic. Electronic document management is a comparatively simple process. Using TELEFAX to submit forms (form BSEE-0132 and BSEE-0143) is unacceptable in the second decade of 21st century. TELEFAX technology is from the 19th century and actually predates the telephone.

**Record Keeping**

Here again BSEE needs to move away from paper based document storage and retention. All documents should be stored in a cloud computing environment (http://en.wikipedia.org/wiki/Introduction_to_cloud_computing) which is a available to both the operators and BSEE. Inspectors should not be reviewing records on site, this review should be conducted prior to the inspection. Further cloud computing environment would permit data mining analysis of the records to better develop a risked based approach to safety.

**Storm Evacuation Reporting (BSEE-0132)**

Most of the information requested on the form is available from TIMS. Data elements as CONTACT_NAME and PHONE_NUMBER are examples. BSEE already knows how many platforms and rigs are associated with each operator via the permitting process. Further from the OGOR-A reports BSEE has a good handle on the Oil and Gas production. Only the decision to evacuate and return to the platform/rig is not within TIMS. That information could be delivered to BSEE via text message or e-mail.

The current paper based system using BSEE-0132 provides information only at the District Office level. By using the existing TIMS database more a precise picture of impact of the storm on a platform/rig level would be available for the Coast Guard. This data would be realtime and displayed via GIS versus daily from the existing tabular system.