



United States Department of the Interior  
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT  
WASHINGTON, DC 20240-0001

April 8, 2013

Dear SEMS Point of Contact:

As you know, the Final Rule on Safety and Environmental Management Systems (SEMS) published on October 15, 2010, requires that your company perform an audit and submit the resulting report to BSEE. I am writing to emphasize some key points about the audit report as required by the rule.

Under 30 CFR 250.1920(a), operators must conduct a comprehensive audit of their SEMS program. These audit results must be submitted to BSEE following completion of the audit (30 CFR 250.1920(c)). These reports are an important tool for determining an operator's compliance with the auditing requirements and serve as a measure of the effectiveness of SEMS.

At this early stage in the implementation of the SEMS requirements, we are observing that some of the audit reports being submitted to the bureau are extremely limited in scope and only list deficiencies (if any). These reports are clearly not adequate to demonstrate the performance of a comprehensive audit of the SEMS programs. It is BSEE's expectation that the audit reports provided to the agency include a detailed and complete breakdown of what was audited, a determination of the status of implementation, and any auditor findings, including deficiencies and strengths, observations, recommendations, and conclusions. This information will allow BSEE to assess the current status of SEMS programs and measure industry improvements in subsequent years.

I hope this letter clarifies our expectations regarding the scope of your audit report, but please do not hesitate to contact Staci King at [sems@bsee.gov](mailto:sems@bsee.gov) or 703-787-1736, should you have any questions.

Sincerely,

Douglas M. Morris  
Chief, Offshore Regulatory Programs