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... on the basis of specific approval
... of the International Relations.
RELEASED
... OF THE UNITED STATES
WASHINGTON, D. C. 20540

The Honorable William S. Moorhead
Chairman, Subcommittee on Conservation,
Energy, and Natural Resources
Committee on Government Operations
House of Representatives

Dear Mr. Chairman:

At your request, we are commenting on the Geological Survey's inadequate action on two recommendations noted in our reports entitled "Improved Inspection and Regulation Could Reduce the Possibility of Oil Spills on the Outer Continental Shelf" (B-146333, June 29, 1973) and "Followup on Certain Matters Concerning the Inspection and Regulation of Outer Continental Shelf Oil Operations" (B-146333, Feb. 26, 1974).

Our June 29, 1973, report stated that the instructions covering partial inspections of drilling operations on the Outer Continental Shelf did not adequately set forth the prescribed inspection steps. Orders governing inspections of remedial operations had not been issued, inspections of abandonment operations were not regularly scheduled, and inspectors did not always prepare reports on inspection results. We recommended to the Secretary of the Interior that he require the Geological Survey to issue instructions covering partial inspections of drilling operations and inspection of remedial and abandonment operations. In our February 26, 1974, report, we stated that a Survey official told us that inspection instructions would be issued by June 1974.

In a letter to the Subcommittee on Conservation, Energy, and Natural Resources dated June 12, 1974, Survey said instructions are given to the technicians on a continuing basis during day-to-day inspections by the District Supervisor and his staff of engineers. Survey also said that inspection schedules for these types of operations are established as needed within the operations framework and that a new order will be forthcoming on remedial operations.

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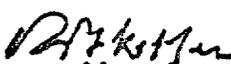
Although instructions given on a continuing basis during day-to-day inspections serve some useful purpose, we believe that written guidelines would provide greater insurance that inspection activities were being administered and reported uniformly.

Our June 29, 1973, report also cited a need for regulating additional offshore operations which have pollution danger but which were not regulated at the time of our review. We recommended that the Secretary of the Interior require Survey to issue regulatory orders to control erosion, work-over and wireline operations, and certain concurrent operations from a single structure. In our February 26, 1974, report, we stated that a Survey official told us that such regulations would be issued by June 1974.

As part of our periodic followup procedures, we have followed the progress of these regulation changes. On October 28, 1975, a Survey official told us that the regulation changes would not be finalized and put into effect until early 1976.

As agreed with your office, a copy of this letter is being sent to the Secretary of the Interior.

Sincerely yours,


ACTING Comptroller General
of the United States

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