



NOV 12 2010

Reply to the Attention of:

Mr. Joseph R. Hurt  
Senior Director, Land Operations  
International Association of Drilling Contractors  
10370 Richmond Avenue, Suite 760  
Houston, TX 77042

Dear Mr. Hurt:

Thank you for your July 29, 2010, letter to the Occupational Safety and Health Administration's (OSHA) Directorate of Enforcement Programs (DEP). Your letter has been referred to DEP's Office of General Industry Enforcement (GIE) for an answer to your question regarding the applicability of general industry standards to oil and gas well drilling operations. This constitutes OSHA's interpretation only of the requirements discussed and may not be applicable to any question not delineated within your original correspondence.

Your question is paraphrased and our response follows.

**Question:** In the oil and gas well drilling and servicing industry, do OSHA's general industry standards (29 CFR 1910) apply to rigging up and rigging down operations?

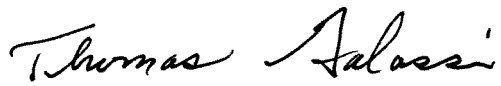
**Reply:** Yes, as stated in OSHA's letter of interpretation to Mr. Kenny Jordan dated April 27, 2009:

**All** other aspects [excluding site preparation which includes activities such as leveling the site, trenching, and excavation] of oil and gas well drilling and servicing operations are covered by 29 CFR 1910, or in the case where serious hazards exist in the workplace that are not addressed by a specific OSHA standard, Section 5(a)(1) ("General Duty Clause") of the OSH Act. [Emphasis added.]

Thank you for your interest in occupational safety and health. We hope you find this information helpful. Please be aware that OSHA's enforcement guidance is subject to periodic review and clarification, amplification, or correction. Such guidance could also be affected by subsequent rulemaking. In the future, should you wish to verify that the guidance provided herein remains current, you may consult OSHA's

website at [www.osha.gov](http://www.osha.gov). If you have any further questions, please feel free to contact the Office of General Industry Enforcement at (202) 693-1850.

Sincerely,

A handwritten signature in black ink that reads "Thomas Galassi". The signature is written in a cursive style with a large, stylized initial "T".

Thomas Galassi, Director  
Directorate of Enforcement Programs

Enclosure