



# INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

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29 August 2006

CAPT Timothy F. Mann  
Commander, Eighth Coast Guard District (p)  
Hale Boggs Federal Bldg  
501 Magazine Street  
New Orleans, Louisiana 70130-3396

Re: Post-Incident Testing

Dear Captain Mann:

As you are aware, the International Association of Drilling Contractors is a trade association representing the interests of drilling contractors, onshore and offshore, operating worldwide. Our membership includes all the drilling contractors currently operating mobile offshore drilling units (MODUs) in the areas subject to the jurisdiction of the United States as well as all MODUs registered in the United States.

With regard to the revised alcohol and drug testing requirements, which became effective on 30 June 2006, we are writing to request confirmation of our understanding of its applicability to foreign flagged MODUs operating on the U.S. Outer Continental Shelf (OCS), which is:

- (1) A foreign flagged MODU located beyond the territorial waters (12 NM) of the United States is not required to conduct alcohol and drug testing for any marine casualty.
- (2) Within the territorial waters of the U.S. a foreign flagged MODU would be required to conduct alcohol and drug testing for any serious marine incident as defined in 46 CFR 4.03-1. Additionally, it would also be required to notify the Coast Guard of the casualty as soon as possible and to submit a written report within ten (10) days of the casualty per 33 CFR 146.303.

If you have any questions regarding this correspondence, please contact me by phone at: (713) 292-1945, ext 203.

Sincerely,

John Pertgen  
Assistant Director, Offshore Technical  
and Regulatory Affairs

cc: All D8 Sector Investigation Divisions / Branches