

INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

P.O. Box 4287 • Houston, Texas 77210-4287 USA
10370 Richmond Ave., Suite 760 • Houston, Texas 77042 USA
Phone: 1/713-292-1945 • Fax: 1/713-292-1946
• www.iadc.org

17 September 2012

TOPIC: Derrick Ladder Permanent Variance

US Land Drilling Contractors

In 1973 IADC requested and received a Temporary Variance from requirements of 29 CFR 1910.27 (b) (1) (i), (ii), (iii) and (c) (4). OSHA recently realized that they did not follow up with a permanent ruling on the ladder variance. Due to this, they are requesting that any drilling contractor who wishes to continue with the variance must request a "Permanent Variance". IADC has not found data to indicate that derrick ladders as currently designed along with the use of derrick climbing assist devices and/or fall arrest systems, have created an increased workplace hazard.

OSHA has requested that each drilling contractor who wishes to obtain a permanent variance, complete and sign the "OSHA Ladder Permanent Variance" application form (attached). OSHA initially requested that companies list all their rigs and locations, but have settled for listing the addresses of company headquarters and all regional operations offices. Companies are also to include engineering information as to why their derrick ladders cannot meet the regulation and how they intend to keep employees safe while using derrick ladders (such as a derrick climb assist device with a fall arrest system). If you have data that supports the position that the ladders are just as safe utilizing alternative methods of keeping personnel safe while climbing or descending derrick ladders, you should enter that information as well.

Although companies may apply for a permanent variance directly to OSHA either online or through the mail, it may be better to make the initial application for the permanent ladder variance in mass with a cover letter from IADC. With that in mind, IADC is planning to submit the completed applications that are receive to OSHA on 15 October, 2012. If your company wishes to participate in the permanent ladder variation application, please return the signed application to IADC by 12 October 2012. The completed forms can be returned to IADC by regular mail, or scanned and sent to IADC via e-mail to Leslie Packard at leslie.packard@iadc.org. If the company has multiple area operations offices,

the additional office locations and addresses can be completed on a separate sheet and attached to the application.

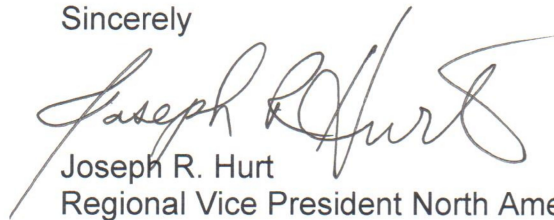
Note the following information regarding completing the application for a permanent variance:

1. Contractors need to complete all items in Section I. If you have more regional (area) operations offices than spaces available, add additional sheets with the required information.
2. Section II 4 listing has the standards from which the permanent variance is being requested already entered into it.
3. Section II 5. Has information from the original application for the temporary variance included in it. Also included is the variance statement from 29 CFR 1910.27(d) (5) regarding Ladder safety devices in Section II 5. If your company has additional engineering information specific to your rigs it should be added to this section. Any additional information your company has such as a photo of a sign posted at the base of the derrick ladder or other method of informing employees can be added here as well.
4. Section II 6 & 7 each company will need to complete.
5. Section II 8 The temporary variance issued in 1973 serves this purpose contractors do not need to add anything.
6. Section II 9 will need to be completed by each company as applicable.
7. Section II 10 will need to be signed by the authorized company representative.

A copy of the form in which IADC has completed the general information along with filing instructions is attached. These documents will also be posted on the IADC Land Operations Division web page at: <http://www.iadc.org/iadc-committees/land-operations-division/osh-documents/>

If you have any questions, please feel free to contact me.

Sincerely



Joseph R. Hurt
Regional Vice President North America Land