From: Honeycutt, Clint
Sent: Mon Apr 13 16:11:55 2009
To: Thierens, Harry H; Tink, Steve
Subject: Regulatory and Group Compliance Meeting Follow-up
Importance: Normal
Attachments: Reg Compliance rev 4.ppt; GoM Regulatory Notice Process.doc; US_Framework_Final.pdf; GoM - Holstein Rig (2-10-2009).xls

Attached are all the Documents we referenced during our meeting. The slides below are updated with the potential severity.

<<...>> <<...>> <<...>> <<...>>

Regards,

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Exhibit No. _____
Worldwide Court Reporters, Inc.

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Regulatory and Group Compliance

April 2009

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Potential Severity

The impact to our operations if we don't manage regulatory compliance is:

- MMS Inc
- Damage BP's Reputation (Government and Civilian)
- Civil Penalties
- Federal Probation with conditions specified by the Government
- Jail time
- Lease refusal
- Lose "Privilege to Operate"

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GoM Regulatory Notice Process

Document Number: CD # UPS-US-SW-GOM-HSE-DOC-000xx-2

Document Authority:	GoM HSSE Director Curtis Jackson	**Document Custodian:**	GoM HSSE Regulatory & Advocacy Manager James R. Grant
Scope:	GoM SPU	**Doc Admin:**	GoM HSSE Document Management Administrator
Issue Date:	00/00/00	**Issuing Dept:**	GoM HSSE
Revision Date: **Next Review Date:**	00/00/00 0/00/00	**Control Tier:**	2 – GoM HSSE

1.0 Purpose/Scope

This document describes the Gulf of Mexico Strategic Performance Unit's process for identifying and interpreting new and proposed regulations, tracking actions necessary to ensure regulatory compliance and the process for communicating these regulations and requirements to the organization. Implementation of this policy supports delivery of the OMS and HSSE Performance agendas and drives standardization, simplicity and consistency across the SPU.

2.0 Acronyms

Term	Definition
CMF	Compliance Management Framework
EPA	Environmental Protection Agency
GoM	Gulf of Mexico
GoM SPU	Gulf of Mexico Strategic Performance Unit
HSSE	Health, Safety, Security & Environment
MMS	Minerals Management Service
NTL	Notice to Lessees
OMS	Operating Management System
SME	Subject Matter Expert
TA / EA	Technical / Engineering Authority
USCG	United States Coast Guard

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3.0 General Requirements

Ensure consistent delivery of new regulatory requirements to the GoM SPU and support consistent implementation and interpretation of these regulations across the organization.

- Identify new or changed policies or regulations issued by MMS, EPA or USCG
- Provide interpretation of new or changed policies or regulatory compliance requirements
- Consistently and clearly identify actions required to ensure compliance with these policies or regulations
- Ensure Asset managers, VPs and SPU leadership have a clear line of sight to actions required by regulators to ensure compliance
- Identify responsible parties within the GoM SPU to ensure actions are completed and documented

4.0 Regulatory Notice Process

- Designated Regulatory Advisor will track new and proposed policies or regulations daily through the Federal Register, industry meetings, CyberRegs subscription, dialogue with regulators

- When a new or changed policy or regulation is published in the Federal Register or as an NTL, a draft summary of the NTL or rule change will be written by a Regulatory Advisor

- A team of Subject Matter Experts (SME) will be identified and formed to analyze the rule/NTL and determine potential impacts and cost to the GoM SPU business

    - The team will consist of relevant personnel from the Technical/Engineering Authority Group, Operations, Drilling, Marine, Regulatory and the Compliance Management Framework group or others as required

- The SME team will identify all actions that are required as a result of any new or changed regulatory requirements or policies, obtain appropriate management approval for recommendations, and assign a responsible party for each action.

    - Responsible party, if not already part of the SME team, will be notified by the team to assure acceptance and agreement of the action

- A Regulatory Notice will be finalized, posted to the HSSE Regulatory Webpage and distributed to the SPU Extended Leadership Team, the Regulatory team and line personnel as required to ensure a clear line of sight to actions required by regulators.

5.0 Tracking Identified Actions

- All identified actions from the SME team will be loaded into Action Tracker within seven days of the distribution of the Regulatory Notice

    - A designated member of the SME team will be assigned the responsibility of ensuring the actions get uploaded into the Action Tracker tool

- Any changes to the Compliance Management Framework matrices / processes will be made by the

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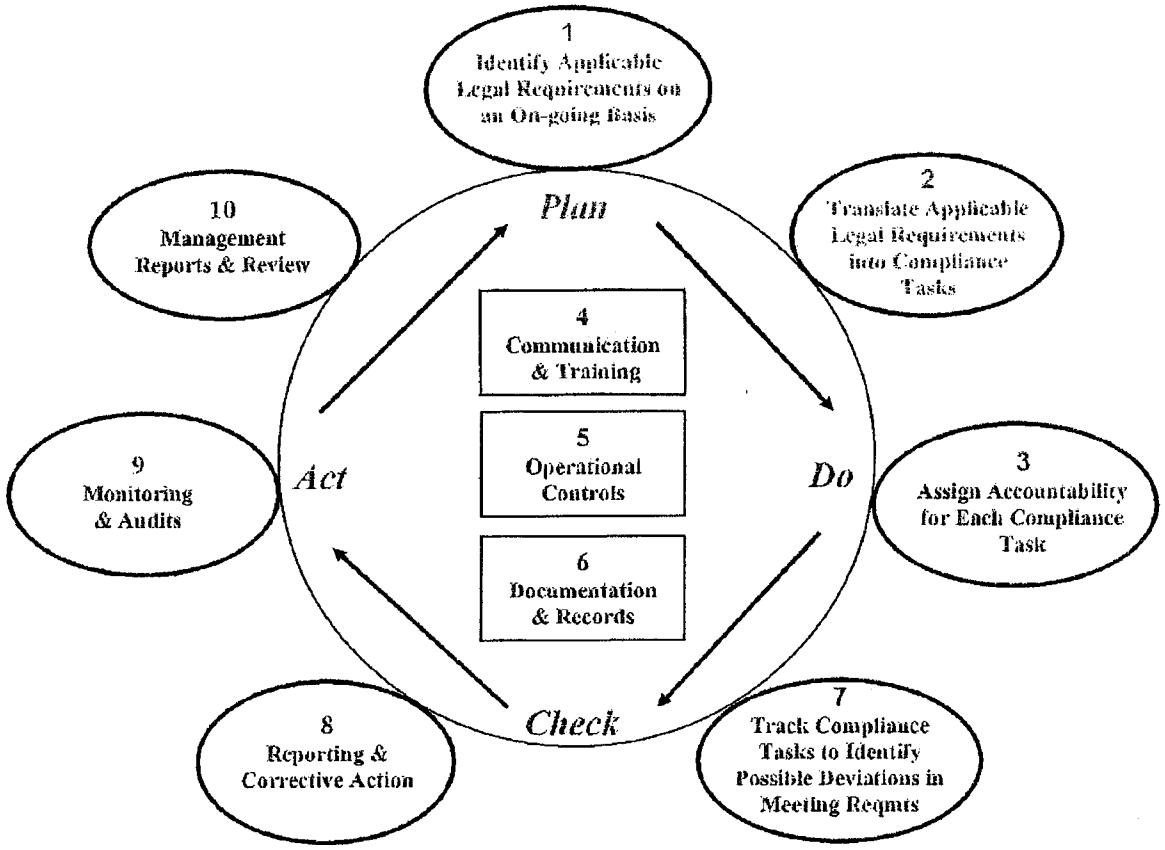
Exhibit 1
U.S. Compliance Management Process



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