2025 RECOMMENDED MODERNIZATION OF REFERENCED STANDARDS IN BSEE CFR

December 5, 2025 | R1

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Draft v. 1	Draft #1 issued to workgroup and industry SMEs for review and comment	09/25/2025
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Disclaimer

The materials generated for this document, inclusive of the appendices, were generated from a volunteer effort within the Offshore Operators Committee (OOC) Referenced Standards Workgroup. These materials drew upon lessons learned from multiple operators and contractors. Each operator or entity is solely responsible for verification and modification of these materials for their organization's needs prior to use. OOC, its staff and all the contributing volunteers assume no liability for the content or use of the produced materials.

TABLE OF CONTENTS

LIST OF FIGURES

LIST OF TABLES

1 Executive Summary

The objectives of this effort, as they have been since this industry's effort began in 2020, are for Offshore Operators Committee (OOC) and the American Petroleum Institute (API) to provide an avenue to:

1. Annually review the standards currently referenced in the Bureau of Safety and Environmental Enforcement (BSEE) Code of Federal Regulations (CFR) with industry subject matter experts (SMEs)
2. Identify the industry-related standards with a broad-range of industry SMEs that need to be updated, added, or removed
3. Increase operating companies' knowledge of the standards referenced in 30 CFR 250.198

The recommendations in this *2025 Recommended Modernization of Referenced Standards in BSEE CFR* document present the recommendations from the 2025 Referenced Standards workshop and two topic-specific meetings. Industry SMEs have provided expert information and data to this process, allowing OOC to provide BSEE with a list of the most urgent referenced standards in the CFR that need removing, updating, or adding based on these assessments.

Reasons the standards incorporated by reference (SIBR) need to be reviewed include:

- The standard incorporated by reference is out-of-date.
- Technologies have evolved, and the standard listed in the CFR no longer reflects the current available technology.
- Lessons learned from using the older standard show that it is no longer up-to-date, and a newer edition should be used.
- Standard was withdrawn by standard-setting organizations and replaced by a newer standard.
- Standard organizations have released new standards that reflect current technologies and practices.

Timely updates to the BSEE CFR will allow for safer and more efficient operations, allowing industry to comply with the most up-to-date, relevant standards without needing to request alternative compliance.

Currently, the BSEE CFR contains 125 referenced standards. In November 2023, BSEE issued Proposed Rule 1014-AA51 titled "Oil and Gas Sulfur Operations in the Outer Continental Shelf – Documents Incorporated by Reference". This proposed rule incorporates changes to 115 SIBR in the CFR, including 62 measurement standards, 46 structural and design standards, 4 integrity management standards, 2 inspection standards, and 1 quality standard. 50 of these standards have been included in at least one of OOC's previous referenced standards reports. OOC and API provided comments to the proposed rule in February 2024 and reiterated our suggestions in the 2024 referenced standards report. As of the publication date of the 2025 report, the final rule has not been issued. Therefore, this report once again reiterates our support for our previous recommendations with three exceptions as detailed in the final recommendations table below (Table 3). OOC recommends that these three standards be updated to reflect a more recent edition of the standard since our original recommendation.

While the November 2023 proposed rule has identified many standards listed in the BSEE CFR to be updated, other standards remain out-of-date. OOC, API, and BSEE have continued this collaborative effort to collect volunteer SME input to identify and address standards that we feel

need further updates, which is reflected in this document.

Appendix A lists the referenced standards in the BSEE CFR as of October 2025.

2 BSEE Rule Making Process

The BSEE rule making process is a complex process which requires in-depth evaluation and analysis of the applicable standards. This section briefly describes this process.

What is incorporation by reference?
Incorporation by reference was established by statute and allows Federal agencies to meet the requirement to publish regulations in the Federal Register by referring to materials already published elsewhere. The legal effect of incorporation by reference is that the material is treated as if it were published in full in the Federal Register. This material, like any other properly issued regulation, has the force of law.[1]

As BSEE has noted, the agency is prohibited from automatically incorporating future amendments to or editions of a standard under applicable rules governing incorporation by reference. The Federal Register requires incorporating a specific, dated edition into the CFR (1 CFR 51.9).

Regulation §250.115 establishes the general expectation for compliance with incorporated documents and defines the procedures for incorporating documents by reference. Regulation §250.198 lists all the standards incorporated and identifies the CFR section where they are referenced. The National Technology Transfer and Advancement Act (NTTAA) mandates the use of standards.

BSEE's use of standards is coordinated through the BSEE Standards Development Section in Houston, BSEE SMEs, and the BSEE Regulations Development Section.

BSEE may do one of the following options:

- Incorporate a standard in its entirety.
- Incorporate certain sections or parts of a standard.
- Intentionally incorporate a previous edition.

Any changes to a standard incorporated by reference require rulemaking action, as required by the Administrative Procedure Act, detailed in the options below:

Option 1: Update by direct final rule, which allows BSEE to publish a final rule without the proposed rule process.

A. § 250.115(b): BSEE may make the rule amending the document effective without prior opportunity for public comment when BSEE determines:
    1. That the revisions to a document result in safety improvements or represent new industry standard technology and do not impose undue costs on the affected parties; and
    2. BSEE meets the requirements for making a rule immediately effective under 5 U.S.C. 553.

B. 5 U.S.C. 553:

[1] Mineral Resources | Chapter II: Bureau of Safety and Environmental Enforcement, Department of the Interior | Subchapter B: Offshore, 30 CFR 198.250, pg. vi)

1. To interpretative rules, general statements of policy, or rules of agency organization, procedure, or practice; or
2. When the agency for good cause finds (and incorporates the finding and a brief statement of reasons in the rules issued) that notice and public procedure thereon are impracticable, unnecessary, or contrary to the public interest.

Option 1 is typically a shorter process that takes approximately six months and is typically used for updating out-of-date documents incorporated by reference to the current editions. In general, this can be accomplished if the changes between the incorporated standard and the newer edition are not significant. It is also used when there are critical environmental and personnel safety needs.

Option 2: Update through notice and comment rulemaking process (proposed rule, public comment, and final rule). This complete rulemaking process requires the following:

1. Publication of a notice of proposed rulemaking.
2. Public comment period.
3. Evaluation and response to public comments.
4. Publication of a final rule.

Option 2 is a much longer process that takes at least 1 to 2 years and is usually used for standards not currently incorporated by reference (i.e., new to the BSEE CFR) and when there are significant differences between the incorporated standard and the updated edition.

Additional Options: BSEE regulations allow for an alternative approach:

A. § 250.115(d): Under §250.141 and §250.142, allows for compliance with a later edition of a specific standard incorporated by reference, provided:
    1. It can be shown that complying with the later edition provides a degree of protection, safety, or performance equal to or better than would be achieved by compliance with the listed edition and,
    2. Prior written approval from BSEE for alternative compliance can be obtained.

This allows operators to request compliance with a newer edition on a case-by-case basis.

Appendix B contains the Code of Federal Regulations – Incorporation by Reference text in-full.

2.1 Non-Referenced Standards

Standards are important in engineering, design, operations, and maintenance in all areas of offshore energy development. While only 125 published standards are currently referenced in the BSEE CFR, other standards play an important role in ensuring consistency, implementing lessons learned, providing guidance on applying new technology, and transferring captured knowledge that enables opportunities for continuous improvement.

Figure 1 illustrates the overall relationship between Federal statutes, BSEE, and the BSEE Standards Development Section. The regulatory authority of BSEE is pursuant to the Outer Continental Shelf Lands Act (OCSLA), and the referenced standards covered in this report are a further subset of the BSEE regulatory landscape. There are many standards outside of the BSEE CFR references that play an important role in offshore energy development. The National Technology Transfer and Advancement Act (NTTAA) mandates Federal policy that establishes a

preference for using voluntary consensus standards in lieu of government-specific regulations. These non-referenced standards are available for industry to use and adopt voluntarily.

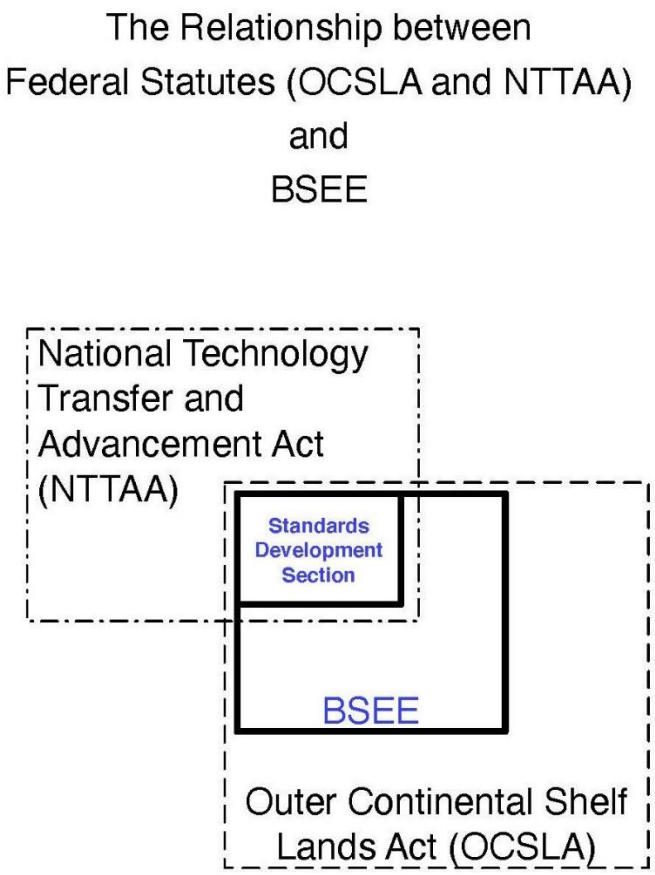

Figure 1: Relationship Between Federal Statutes

Alternative compliance requests are appropriate when an applicant substitutes for any regulatory provision in a BSEE CFR-referenced standard or the specific BSEE regulatory language. Alternative compliance requests are not required to use a standard, published or company-specific, that does not overlap with a BSEE CFR-referenced standard or specific BSEE regulatory language.

2.2 Normative References

A second-tier or normative reference is a reference that is used as part of a “first-tier” SIBR as found in 30 CFR 250.198. A normative reference is a separate standard or document that is indispensable for the application of a first-tier SIBR, making it part of a required, multi-tiered compliance structure.

While it is generally prudent to use the most recent edition or version of a standard, the provided caveat has the potential to cause conflict with BSEE’s requirements concerning the use of the latest document. Specifically, the latest version of a standard within a normative reference may not match the version in the SIBR.

If an undated normative reference is cited in a SIBR AND the undated normative reference is also a SIBR in the relevant CFR, the edition that is cited in the regulation shall be the edition that applies to the cited normative reference.

In cases where an undated normative reference is cited in a SIBR AND the undated normative reference is NOT a SIBR, the appropriate edition of the undated normative reference to use shall be the edition published equal to or earlier than the SBIR.

Understanding the Interaction between Two Systems

Some background is important for a clear understanding of nested citations in the CFR. The Office of the Federal Register (OFR) has rules for incorporation by reference (IBR) and standard development organizations (SDO) have rules for promulgating technology. These two systems serve fundamentally different purposes, namely regulatory certainty versus technology transfer.

Under 1 CFR 51.1(f), when a federal agency incorporates a standard by reference, it must reference a specific edition of that standard. This requirement exists to provide regulatory certainty and ensure the public has definitive knowledge of applicable requirements. The IBR "freezes" the standard at the edition that existed when the regulation was promulgated.

Application to Normative References (aka normative secondary standards)

When the primary standard (incorporated by a specific edition) contains normative references to secondary or tertiary standards, those references are also "frozen" to the editions that were current at the time the primary standard was published. This applies even if:

- The primary standard uses language like "most recent edition" of the normative standard
- The secondary normative standard has been updated since the primary standard's publication
- Industry practice has moved to newer editions of the secondary normative standard.

Operators should comply with the edition of the normative secondary standard that was current when the incorporated primary standard was published, not any subsequently published editions.

Reasoning for this includes:

- Regulatory Certainty: The IBR system requires that regulated parties know exactly which requirements apply. Allowing “floating” references to evolving standards would undermine this certainty.
- Legal Compliance: Your compliance obligation is tied to what was incorporated by reference, which includes the normative references as they existed at that time.
- Due Process Requirements: Agencies cannot enforce requirements that the public could not have known about when the regulation was published.

If normative standards could automatically update editions published after the primary standard, regulated entities would face:

- Unknowable compliance obligations
- Violations of due process
- Regulatory uncertainty that defeats the purpose of the IBR system

Comparison of Federal Register vs. SDO Systems for Normative References

These two systems operate under fundamentally different principles and objectives, creating tension when they intersect in the regulatory environment.

The Federal Register/IBR system is designed to achieve regulatory certainty and due process compliance. The IBR system freezes standards to specific editions, treating them as legal requirements once incorporated into regulations. The approach prioritizes predictability over technical currency, ensuring that regulated entities and enforcement agencies operate under the same defined set of requirements. This creates legal certainty because regulated entities know exactly which requirements apply to their operations. It ensures due process compliance by providing the public with clear notice of specific obligations, allows for consistent enforcement since agencies can only enforce what was properly incorporated through rulemaking, and creates judicially defensible standards that courts can review as specific, defined requirements. Additionally, the IBR system provides cost predictability by allowing compliance investments to be based on known, stable requirements.

However, the IBR system also creates drawbacks. Technical obsolescence becomes inevitable as requirements lag technological advancement, potentially creating stagnation where newer improvements are not automatically adopted. The system can create innovation barriers that discourage adoption of improved practices, leading to industry frustration as it creates a disconnect between regulatory and industry practice. There is an administrative burden that requires formal rulemaking processes every time technical standards need updating.

The SDO system operates under completely different principles, with technical advancement and current best practices as its primary objective. This system actively promotes use of the most recent editions of standards, treating them as evolving technical guidance rather than static legal requirements. The approach prioritizes technical currency over regulatory stability, reflecting the SDO's mission to advance technology and safety through continuous improvement. This creates technical currency by incorporating the latest technology and research, enhances safety through continuous improvement in safety standards, promotes innovation by encouraging adoption of advanced practices, maintains industry alignment with current practice, and provides dynamic response capabilities that can quickly address emerging technical issues.

The SDO system's focus on currency creates its own set of problems when it intersects with regulatory requirements. Regulatory uncertainty emerges as compliance becomes a “moving target,” raising due process concerns because the public may not know which requirements apply in a legal context. Enforcement becomes difficult when it is unclear which edition forms the basis for potential violations, cost volatility increases as compliance requirements may change unexpectedly, and vulnerability arises because enforcement actions may face legal challenges when based on undefined or changing standards.

The fundamental conflict emerges most clearly when primary standards reference “most recent” secondary standards. The SDO’s intent is to keep users current with the best technical practices available, but the Federal Register reality is that this creates undefined regulatory obligations. This poses a significant legal problem because it violates the IBR requirement for specific editions, creating a practical result of regulatory uncertainty that serves neither system well. The tension between these systems reflects the broader challenge of maintaining both legal certainty and technical relevance in a rapidly evolving technological landscape, where the law's need for stability conflicts with technology's drive for continuous improvement.

3 Process

This report contains SME input gathered from three meetings and workshops held in 2025. To solicit SME involvement from various backgrounds, this process included multiple stakeholders, including BSEE, leaseholders, service companies, consultants, and trade organizations.

Below is the schedule of the industry engagement process. All these meetings were open to all industry SMEs and were advertised through OOC and API communication channels.

Date	Event/Activity
March 5 – 27, 2025	Online pre-workshop survey soliciting workshop discussion items
March 18, 2025	API RP 2A-LRFD and API 2A-WSD design workshop (virtual)
April 10, 2025	Referenced Standards workshop (in-person & virtual)
September 9, 2025	Secondary references discussion (virtual)

3.1 API RP 2A-LRFD and API 2A-WSD Workshop

During the 2024 referenced standards process, the workgroup identified and agreed to discuss supporting the inclusion of API RP 2A-LRFD (Recommended Practice for Planning, Designing, and Constructing Fixed Offshore Platforms—Load and Resistance Factor Design); 2nd Edition (2019), Reaffirmed 2024 in the 2025 referenced standards report.

API RP 2A-WSD (Planning, Designing, and Constructing Fixed Offshore Platforms—Working Stress Design); 21st Edition (2000), Errata and Supplement 1, December 2002; Errata and Supplement 2, September 2005; Errata and Supplement 3, October 2007 is currently referenced in the BSEE CFR. In 2020, OOC recommended that this standard be updated to the 22nd Edition, (2014), Reaffirmed 2020 in the BSEE CFR. OOC continues to support this update in the BSEE CFR.

In the 2025 workshop to discuss these two standards, the SME group noted that including API RP 2A-LRFD in the BSEE CFR would remove the requirement to use alternative compliance if the asset owner wishes to use this method. The workgroup recognizes the guidance within API Subcommittee 2 that both methods are adequate and safe, provided that they follow the method in a consistent and comprehensive manner.

An important document that underpins API RP 2A-LRFD and API 2A-WSD is API RP 2GEO (Geotechnical and Foundation Design Considerations), 1st Edition (2011). API RP 2A-WSD, 22nd Edition (2014), Reaffirmed 2020 refers to API RP 2GEO without an edition number. API RP 2A LRFD refers to RP 2GEO without edition number in one instance and to RP 2GEO 1st Edition in another. Separately, API RP 2T (Recommended Practice for Planning, Design and Construction Tension Leg Platforms); 3rd Edition (2010), Reaffirmed 2023 does not refer to API RP 2GEO but to 2A-WSD (21st Edition) for foundations, and API RP 2SK (Design and Analysis of Stationkeeping Systems for Floating Structures), 4th Edition (2024) does not refer to API RP 2GEO but refers to ISO 19901-4 (Geotechnical and foundation design considerations) without an edition number. The latest editions of the API Subcommittee 2 documents for fixed and floating platforms, risers and pipelines, jack-ups and all subsea structures refer to API RP2GEO for the geotechnical and foundation design requirements. The current API RP2GEO (1st Edition) has undergone major revision, and the 2nd Edition will be published later in 2025. As it currently stands, there are no recommendations for the design of deepwater anchors in the API suite of standards in the CFR. This is a glaring gap that can only be remedied by including API RP 2GEO 2nd Edition as a SIBR. The existing recommendations in 2A-AWD, 2A-LRFD, and 2T are out-of-date and do not consistently allow for a reliable foundation design, which again necessitates the

use of 2GEO 2nd Edition.

Therefore, **the recommendation is to add API Recommended Practice 2A-LRFD: Recommended Practice for Planning, Designing, and Constructing Fixed Offshore Platforms—Load and Resistance Factor Design; 2nd Edition (2019), Reaffirmed 2024 to the BSEE CFR**.

Further, it is recommended that API RP 2GEO, Geotechnical and Foundation Design Considerations (2011), Addendum 1 (2014) be added to the BSEE CFR.

It is particularly important to note that these standards should not be mixed and that the normative standards in each of the primary standards should not be mixed as well.

Appendix C lists the attendees of this workshop meeting.

3.2 2025 Stakeholder Workshop

The 2025 Stakeholder Workshop was held on Thursday, April 10, 2025, in Houston, TX with a virtual attendance option.

The 2025 OOC/API Referenced Standards Workshop provided an opportunity for an in-depth discussion, primarily reviewing the standards that we have previously recommended since this process began in 2020.

During this review, the group discussed whether any of the previous recommendations have changed. This included changes to the Add, Update, or Remove recommendations, changes to the edition number recommended for incorporation, and/or changes to the priority level. There was an opportunity for industry SMEs to suggest additional standards for consideration and discussion.

Due to the status of the November 2023 proposed rule AA-51 (“Oil and Gas and Sulfur Operations in the Outer Continental Shelf-Documents Incorporated by Reference.”), the standards included in this proposed rule were not eligible for discussion at the 2025 workshop.

Table 1 shows the 23 standards that were discussed during the 2025 workshop.

Table 1: Standards discussed at the 2025 workshop

	Standard Name	Standard Title	Recommended Action	OOC Priority
1	API RP 2A-LRFD – 2nd Edition (2019), Reaffirmed 2024	Recommended Practice for Planning, Designing, and Constructing Fixed Offshore Platforms—Load and Resistance Factor Design	Add	Medium
2	API RP 2TOP – 1st Edition (2019)	Topsides Structure	Add	Medium
3	API BULLETIN 2INT-MET (2007)	Interim Guidance on Hurricane Conditions in the Gulf of Mexico	Remove	High
4	ACI 318-19 (1995)	Building Code Requirements for Structural Concrete	Update to 2019 Edition	Medium
5	COS 2-03 - 1st Edition (2012)	Requirements for 3rd Party SEMS Auditing	Update to 2nd Edition (2020)	Low
6	API Spec. 17D - 2nd Edition (2011)	Design & Spec of Subsea Production Systems - Subsea Wellhead and Tree Equipment	Update to 3rd Edition, Addendum 1 (2022)	High
7	API Spec 6A – 20th Edition (2016)	Specification for Wellhead and Christmas Tree Equipment	Update to 21st Edition (2020)	High
8	API RP 1111 – 5th Edition (2015)	Design, Construction, Operation, and Maintenance of Offshore Hydrocarbon Pipelines (Limit State Design)	Add	High
9	ASME BPVC-Section VIII (2017)	Rules for Construction of Pressure Vessels	Update to 2019 version	High
10	NACE STD MR0175-2003	Metals for Sulfide Stress Cracking and Stress Corrosion Cracking Resistance in Sour Oilfield Environments	Update to AMPP NACE MR0175/ISO 15156-1, NACE MR0175/ISO 15156-2, and NACE MR0175/ISO 15156-3	High
11	AWS D1.1:2000 – 17th Edition (1999)	Structural Welding Code - Steel	Update to AWS D.1:2010 - 22nd Edition (2010)	Low
12	ANSI/ASME B 31.8-2003 (2004)	Gas Transmission and Distribution Piping Systems	Update to 2022 Edition	High

13	ANSI/ASME B16.5-2003	Pipe Flanges And Flanged Fittings: NPS 1/2 Through 24	Update to 2020 Edition	Low/Med
14	ANSI/ASME VIII D1 2017 Edition	Boiler and Pressure Vessel Code, Section VIII, Rules for Construction of Pressure Vessels; Division 1	Update to 2019 Edition	Low
15	ANSI/ASME VIII D2 2017 Edition	Boiler and Pressure Vessel Code, Section VIII, Rules for Construction of Pressure Vessels; Divisions 2	Update to 2019 Edition	Low
16	NACE RP 0176-2003	Corrosion Control of Steel Fixed Offshore Platforms Associated with Petroleum Production	Update to AMPP NACE RP-0176 (2022)	Low
17	API RP 17V – 1st Edition (2015)	Recommended Practice for Analysis, Design, Installation, and Testing of Safety Systems for Subsea Applications	Add	High
18	API SPEC 14L – 3rd Edition (2020)	Lock Mandrels & Landing Nipples	Add	High
19	API SPEC 11D1 - 2nd Edition (2009)	Packers and Bridge Plugs	Update to 3rd Edition (2015), Errata 1 (2019)	High
20	API STD 17G - 3rd Edition (2019)	Design and Manufacture of Subsea Well Intervention Equipment	Add as a group with API RP 17G1, 1st Edition, API RP 17G5, 1st Edition	Medium
21	API RP 17G1 - 1st Edition (2022)	System Configuration and Operation for Subsea Well Intervention Systems	Add as a group with API RP 17G, 3rd Edition, API RP 17G5, 1st Edition	Medium
22	API RP 17G5 - 1st Edition (2019)	Subsea Intervention Workover Control Systems	Add as a group with API RP 17G, 3rd Edition, API RP 17G1, 1st Edition	Medium
23	API STD 17O - 2nd Edition (2014), Reaffirmed 2019	Standard for Subsea High Integrity Pressure Protection Systems (HIPPS)	Add	Low

The workshop agenda can be found in Appendix D.
Appendix E lists the 2025 workshop participants.

3.3 Secondary References Discussion

The need for clarification on the appropriate edition and version of secondary or normative references utilized when it is used as part of a first-tier standard incorporated by references was raised during the 2025 workshop. The complexity of the issue warranted a separate meeting to allow for more detailed discussion on this topic.

The secondary references virtual meeting was held on September 9, 2025. During this meeting, several examples of these complex interdependencies were shown. BSEE was able to clarify how these secondary standards were to be utilized, resulting in the clarification as listed above in Section 2.2 – Normative References.

During this discussion, two points were clarified:

1) All federal agencies must incorporate a specific edition into the CFR. It is implied that normative references use the most recent edition of a secondary standard if the normative standard does not have a date listed.
2) The edition that is referenced is one that existed at the time of incorporation.

Appendix F lists the attendees at secondary references discussion.

4 Final 2025 Recommendations

The final recommendations are listed in Table 3. These following recommendations are primarily extensions of what has been recommended in previous documents that were not listed in the November 2023 “Oil and Gas Sulfur Operations in the Outer Continental Shelf – Documents Incorporated by Reference” proposed rule with further reasoning as to why that particular standard has been listed.

- Column 1 lists the year when the standard was first recommended for action by OOC.
- Columns 2 and 3 give the details as to the official standard number and name as published.
- Column 3 describes the action we recommend taking, which falls under three categories: Add, Remove or Update. The standards that are recommended to be Updated include what edition number we believe best suits current industry practices.
- Column 4 describes what we believe is the appropriate priority for the recommended action.
    - A high priority assigned means that the recommended action will have significant positive impact on industry operations.
    - A medium priority assigned means that while we believe the recommended action is important, it is less urgent.
    - The standards listed as low priority action need review of the recommended action but will have less impact on industry operations.
- Column 5 describes the detailed reason as to why we are commending that particular action.
- Column 6 lists whether or not we are keeping our previous recommendation listed in any of the previous referenced standards reports. If we are not keeping our previous recommendation, the detailed reason is included in Column 5.

Table 2: 2025 Final Recommendations

(Sorted by the order provided by BSEE which principally follows the order in which the standards appear in 250.198 "Documents Incorporated by Reference" with suggested additions to the CFR listed at the end of the table.)

	Year of Original OOC Recommendation	Standard Name	Standard Title	Action	Priority	Reason	Keep recommendation?
1	2020	ACI 318-19 (1995)	Building Code Requirements for Structural Concrete	Update to ACI 318-19 (2019)	Medium	BSEE CFR references an outdated version.	Yes
2	2020	ASME BPVC-Section VIII (2017)	Rules for Construction of Pressure Vessels	Update to ASME BPVC-Section VIII (2019)	High	All fabricators are using the most current edition. BSEE CFR references an outdated version.	Yes
3	2021	ANSI/ASME VIII D1 2017 Edition	Boiler and Pressure Vessel Code, Section VIII, Rules for Construction of Pressure Vessels; Division 1	Update to 2019 Edition	Low	ASME standards are updated every 2 years. BSEE CFR references an outdated version. This update has been deemed a low priority, and this standard is updated bi-annually. Because of this, review of the most recent standard for incorporation may be needed.	Yes
4	2021	ANSI/ASME VIII D2 2017 Edition	Boiler and Pressure Vessel Code, Section VIII, Rules for Construction of Pressure Vessels; Divisions 2	Update to 2019 Edition	Low	ASME standards are updated every 2 years. BSEE CFR references an outdated version. This update has been deemed a low priority, and this standard is updated bi-annually. Because of this, review of the most recent standard for incorporation may be needed.	Yes
5	2023	ANSI/ASME B16.5-2003	Pipe Flanges and Flanged Fittings: NPS 1/2 Through 24	Update to 2020 Edition	Low/Med	Recommend to update. • Several new pressure/temperature tables, new materials. • Referenced in many API standards • There are issues with manufacturers meeting 2003 standard due to outdated technology.	Yes
6	2021 and 2023	ANSI/ASME B 31.8-2003	Gas Transmission and Distribution Piping Systems	Update to 2022 Edition	High	For this update to have impact, specific details of CFR language would have to be modified because CFR explicitly lists formula for design requirements (specifically in 250.1002(a)). This new edition of the standard provides different formulas for design requirements based on diameter over thickness considerations. Recommend to update. • Several new pressure/temperature tables, new materials. • Referenced in many API standards • There are issues with manufacturers meeting 2003 standard due to outdated technology.	Yes
7	2020	API BULLETIN 2INT-MET (2007)	Interim Guidance on Hurricane Conditions in the Gulf of Mexico	Remove	High	Interim document withdrawn by API, superseded by RP2MET, 2nd Edition, which is recommended as an addition	Yes

	Year of Original OOC Recommendation	Standard Name	Standard Title	Action	Priority	Reason	Keep recommendation?
8	2021	API Spec 11D1	Packers and Bridge Plugs, 2nd Edition	Update to 3rd Edition, (2015), Errata 1 (2019)	High	HPHT annexes included in 3rd Edition (carried through to 4th Edition). API 11D1: Recommend BSEE adopts 4th edition published March 2021. Changes from 2nd edition to 3rd edition: • Include HPHT requirements for packers, bridge plugs, and Operational Tools (Annex B). • Includes external flow testing requirements. • Changes from 3rd to 4th: Validation Grade requirements (V3, V0, etc.) are now in table forms. • The section also includes better clarification of rated temperature range versus rated. The 4th Edition update is a critical update due to API Monogram "color-coding" and was published in April 2022. Errata 1 corrected a formatting error that was misleading and was published in October, 2024.	**No** **OOC's recommendation is to update to API Spec 11D1, 4th Edition, Addendum 1, Errata 1** *This recommendation was confirmed with API SC 19 chair in October 2025.*
9	2023	API SPEC 17D	Design & Spec of Subsea Production Systems - Subsea Wellhead and Tree Equipment, 2nd Edition	Update to 3rd Edition with Addendum 1	High	Recommend update (with multiple sections in CFR). Industry recognizes the incorporation in HPHT final rule but may need to be incorporated in other areas of the regulations (250.198) Note that this rule was updated in the HPHT Final Rule to the 3rd Edition, as recommended by OOC. (see section 3.3)	Yes
10	2020	AWS D1.1:2000 – 17th Edition (1999)	Structural Welding Code - Steel	Update to AWS D1.1:2010 – 22nd Edition (2010)	Low	The edition referenced in CFR is outdated. Compliance with the current standard requires both BSEE and industry to process Alternative Compliance requests.	Yes

	Year of Original OOC Recommendation	Standard Name	Standard Title	Action	Priority	Reason	Keep recommendation?
11	2021	NACE STD MR0175-2003	Metals for Sulfide Stress Cracking and Stress Corrosion Cracking Resistance in Sour Oilfield Environments	Update to AMPP NACE MR0175/ISO 15156-1, NACE MR0175/ISO 15156-2, and NACE MR0175/ISO 15156-3 (2020)	High	Reference as ISO 15156 – reference as such so all 3 documents are referenced. Recommendation needs to have specificity related to which aspect of BSEE regulation. NACE MR0175/ISO 15156 is in three parts: · NACE MRO175/ISO 15156-1: General principles for selection of cracking-resistant materials. · NACE MRO175/ISO 15156-2: Cracking-resistant carbon and low-alloy steel, and the use of cast irons. · NACE MRO175/ISO 15156-3: Cracking-resistant CRAs (corrosion resistant alloys) and other alloys	Yes
12	2023	NACE RP 0176-2003	Corrosion Control of Steel Fixed Offshore Platforms Associated with Petroleum Production	Update to AMPP NACE RP-0176 (June 2022)	Low	Recommendation to remove. This is an old reference, and the updated versions are normative referenced in other standards IBR. Industry SMEs noted that this is a normative reference for API Spec 17D	Yes
13	2020	COS 2-03 – 1st Edition (2012)	Requirements for 3rd Party SEMS Auditing	Update to COS 2-03 – 2nd Edition (2020)	Medium	The 2nd edition incorporates lessons learned and improves the performance based continual improvement cycle, which is the intent of the regulation. The essential difference between the 2nd and 3rd Edition of COS-2-03 are definitions for ranking of audit findings. The outcome for the 3rd edition was to eliminate ranking of deficiencies. Findings either conform with requirements, or they don't. All nonconformities require corrective action. There is no conflict between the 3rd Edition of COS-2-03 and auditing against the requirements of the 3rd Edition of API RP 75. The 3rd Edition of COS-2-03 is set up in Paragraph 5.2 to require auditing to the "most recent edition of API RP 75 (unless an earlier version is mandated by applicable regulations)"	**No** **OOC's recommendation is to update to COS 2-03 (2023) - *3rd edition*.** *This recommendation was confirmed with COS staff and the OOC Safety Subcommittee in October 2025.*

	Year of Original OOC Recommendation	Standard Name	Standard Title	Action	Priority	Reason	Keep recommendation?
14	2020	API RP 1111 – 5th Edition (2015)	Design, Construction, Operation, and Maintenance of Offshore Hydrocarbon Pipelines (Limit State Design)	Add	High	This standard is currently referenced in BSEE NTL 2009-G28 for the calculation of internal pressure. It is utilized by operators and recognized by BSEE. Compliance with the current standard requires both BSEE and industry to process Alternative Compliance requests.	Yes
15	2020	API RP 2A-LRFD – 2nd Edition	Load and Resistance Factor Design – Core Principles	Add	Medium	Major update to 1st edition (1993) with significant changes, encourages LRFD approach for GOM fixed structures. The structural design practices are evolving towards a Load Resistance Factor Design.	Yes *(see section 3.1 for additional detailed information)*
16	2020	API RP 2TOP – 1st Edition (2019)	Topsides Structure	Add	Medium	This is a new document focused on design, fabrication, transportation, installation, modification, and structural integrity management for platform topside structures. Complements API 2A-WSD, API 2A-LFRD, API 2 FPS, API 2T and API 2N. Industry SMEs noted that planned reaffirmation by the end of 2025.	Yes
17	2021	API RP 17V – 1st Edition	Recommended Practice for Analysis, Design, Installation, and Testing of Safety Systems for Subsea Applications	Add	High	Based on further discussions with OOC, BSEE and the workgroup chairs, the recommendation of API 17V should recognize reconciliation with 14C and CFR language. Hence, it is recommended by OOC that proper incorporation of this standard will take a longer cycle as compared to the other standards. The inclusion of this standard should be specific to subsea production operations.	Yes
18	2021	API STD 17O	Standard for Subsea High Integrity Pressure Protection Systems (HIPPS)	Add 2nd Edition (2014, Reaffirmed 2019)	Low	To allow for a standard to be used for HIPPS technology rather than operators / BSEE needing to process requests for alternative compliance for use of HIPPS prior to implementation. Regulatory requirements need to be established first to address HIPPS before this standard can be incorporated by reference. BSEE has internal guidelines for assessment of this standard, which could be included in regulations in BSEE Subpart J update.	Yes

	Year of Original OOC Recommendation	Standard Name	Standard Title	Action	Priority	Reason	Keep recommendation?
19	2022	API STD 17G 3rd Edition	Design and Manufacture of Subsea Well Intervention Equipment	Add as a group with API RP 17G1, 1st Edition, API RP 17G5, 1st Edition	Medium	The reasons listed below apply to a set of 17G, 17G1, and 17G5. It is OOC's recommendation that these standards are added as a group. · These standards were initially developed as a single document, however, to subdivide the scope, it was divided into sections; hence the recommendation is to add all three standards together. · New standard covering manufacturing for subsea intervention equipment. · Defines requirements for shear and seal requirements. ·	Yes
20	2022	API RP 17G1 1st Edition	System Configuration and Operation for Subsea Well Intervention Systems	Add	Medium	The reasons listed below apply to a set of 17G, 17G1, and 17G5. It is OOC's recommendation that these standards are added as a group. · These standards were initially developed as a single document, however, to subdivide the scope, it was divided into sections; hence the recommendation is to add all three standards together. · New standard covering manufacturing for subsea intervention equipment. · Defines requirements for shear and seal requirements.	Yes
21	2022	API RP 17G5 1st Edition	Subsea Intervention Workover Control Systems	Add	Medium	The reasons listed below apply to a set of 17G, 17G1, and 17G5. It is OOC's recommendation that these standards are added as a group. · These standards were initially developed as a single document, however, to subdivide the scope, it was divided into sections; hence the recommendation is to add all three standards together. · New standard covering manufacturing for subsea intervention equipment. · Defines requirements for shear and seal requirements.	Yes
22	2023	API SPEC 14L – 3rd Edition	Lock Mandrels & Landing Nipples, 3rd Edition	Add	High	Recommend to update. The CFR contains requirements for locks and landing nipples in 30 CFR 250.811 but does not refer to the proper specification for them.	**No** **Per the 2025 Referenced Standards workshop, industry SMEs suggest removing this recommendation to adding API Spec 14L, 3rd Edition to the BSEE CFR.**

	Year of Original OOC Recommendation	Standard Name	Standard Title	Action	Priority	Reason	Keep recommendation?
23	2025	API RP 2GEO	Geotechnical and Foundation Design Considerations	Add	Medium	*See section 3.1 above*	Yes

Appendix A: List of Currently Referenced Standards in BSEE CFR (*as of Oct. 2025*)

Item	SDO Number	Title	Referenced in current regulations at	Subpart	Edition Incorporated in current regulations
1	ACI Standard 318-95	Building Code Requirements for Reinforced Concrete	§250.901	I	1995 Edition
2	ACI 318R-95	Commentary on Building Code Requirements for Reinforced Concrete	§250.901	I	1995 Edition
3	ACI 357R-84	Guide for the Design and Construction of Fixed Offshore Concrete Structures	§250.901	I	1984; reapproved 1997
4	AGA Report No. 7	Measurement of Natural Gas by Turbine Meters	§250.1203(b)(2)	L	No. 7, Revised February 2006
5	AGA Report No. 9	Measurement of Gas by Multipath Ultrasonic Meters	§250.1203(b)(2)	L	Second Edition, April 2007
6	AGA Report No. 10	Speed of Sound in Natural Gas and Other Related Hydrocarbon Gases	§250.1203(b)(2)	L	No. 10, Copyright 2003
7	ANSI/AISC 360-05	Specification for Structural Steel Buildings	§250.901	I	March 2005 Edition
8	ANSI/ASME BPVC I	Boiler and Pressure Vessel Code, Section I, Rules for Construction of Power Boilers; including Appendices	§§250.851(a) and 250.1629(b)	H, P	2017 Edition, July 1, 2017
9	ANSI/ASME BPVC IV	Boiler and Pressure Vessel Code, Section IV, Rules for Construction of Heating Boilers; including Appendices 1, 2, 3, 5, 6, and Non-mandatory Appendices B, C, D, E, F, H, I, K, L, and M, and the Guide to Manufacturers Data Report Forms	§§250.851(a) and 250.1629(b)	H, P	2017 Edition, July 1, 2017
10	ANSI/ASME VIII D1	Boiler and Pressure Vessel Code, Section VIII, Rules for Construction of Pressure Vessels; Division 1	§§250.851(a) and 250.1629(b)	H, P	2017 Edition, July 1, 2017
11	ANSI/ASME VIII D2	Boiler and Pressure Vessel Code, Section VIII, Rules for Construction of Pressure Vessels; Divisions 2	§§250.851(a) and 250.1629(b)	H, P	2017 Edition, July 1, 2017
12	ANSI/ASME B 16.5-2003	Pipe Flanges and Flanged Fittings: NPS 1/2 through 24	§250.1002	J	11/28/2003
13	ANSI/ASME B 31.8-2003	Gas Transmission and Distribution Piping Systems	§250.1002	J	2003
14	ANSI ASSP Z88.2-1992	American National Standard for Respiratory Protection	§250.490	D	1992
15	API 510	Pressure Vessel Inspection Code: In-Service Inspection, Rating, Repair, and Alteration, Downstream Segment	§§250.851(a) and 250.1629(b)	H, P	10th Edition, May 2014, Addendum 1, May 2017
16	API 570	In-service Inspection, Rating, Repair, and Alteration of Piping Systems	§250.841(b)	H	Fourth Edition, February 2016; Addendum 1, May 2017
17	API Bulletin 2INT-DG	Interim Guidance for Assessment of Existing Offshore Structures for Hurricane Conditions	§250.901	I	May-07
18	API Bulletin 2INT-EX	Interim Guidance for Assessment of Existing Offshore Structures for Hurricane Conditions	§250.901	I	May 2007
19	API Bulletin 2INT-MET	Interim Guidance on Hurricane Conditions in the Gulf of Mexico	§250.901	I	May-07
20	API Bulletin 92L	Drilling Ahead Safely with Lost Circulation in the Gulf of Mexico	§§250.427	D	First Edition, August 2015

Item	SDO Number	Title	Referenced in current regulations at	Subpart	Edition Incorporated in current regulations
21	API MPMS 1	Chapter 1—Vocabulary	§250.1201	L	Second Edition, July 1994
22	API MPMS 2.2A	Chapter 2—Tank Calibration, Section 2A—Measurement and Calibration of Upright Cylindrical Tanks by the Manual Tank Strapping Method	§250.1202	L	First Edition, February 1995; reaffirmed February 2007
23	API MPMS 2.2B	Chapter 2—Tank Calibration, Section 2B—Calibration of Upright Cylindrical Tanks Using the Optical Reference Line Method	§250.1202	L	First Edition, March 1989; reaffirmed, December 2007
24	API MPMS 3.1A	Chapter 3—Tank Gauging, Section 1A—Standard Practice for the Manual Gauging of Petroleum and Petroleum Products	§250.1202	L	Second Edition, August 2005
25	API MPMS 3.1B	Chapter 3—Tank Gauging, Section 1B—Standard Practice for Level Measurement of Liquid Hydrocarbons in Stationary Tanks by Automatic Tank Gauging	§250.1202	L	Second Edition, June 2001, reaffirmed, October 2006
26	API MPMS 4.1	Chapter 4—Proving Systems, Section 1—Introduction	§250.1202	L	Third Edition, February 2005
27	API MPMS 4.2	Chapter 4—Proving Systems, Section 2—Displacement Provers	§250.1202	L	Third Edition, September 2003
28	API MPMS 4.4	Chapter 4—Proving Systems, Section 4—Tank Provers	§250.1202	L	Second Edition, May 1998, reaffirmed November 2005
29	API MPMS 4.5	Chapter 4—Proving Systems, Section 5—Master-Meter Provers	§250.1202	L	Second Edition, May 2000, reaffirmed: August 2005
30	API MPMS 4.6	Chapter 4—Proving Systems, Section 6—Pulse Interpolation	§250.1202	L	Second Edition, May 1999; reaffirmed 2003
31	API MPMS 4.7	Chapter 4—Proving Systems, Section 7—Field Standard Test Measures	§250.1202	L	Second Edition, December 1998; reaffirmed 2003
32	API MPMS 4.8	API Manual of Petroleum Measurement Standards (MPMS) Chapter 4 Section 8 Operation of Proving Systems	§250.1202(a)(2), (a)(3), (f)(1), and (g)	L	First Edition, Nov 1995, reaffirmed March 2007
33	API MPMS 5.1	Chapter 5—Metering, Section 1—General Considerations for Measurement by Meters	§250.1202	L	Fourth Edition, September 2005
34	API MPMS 5.2	Chapter 5—Metering, Section 2—Measurement of Liquid Hydrocarbons by Displacement Meters	§250.1202	L	Third Edition, September 2005
35	API MPMS 5.3	Chapter 5—Metering, Section 3—Measurement of Liquid Hydrocarbons by Turbine Meters	§250.1202	L	Fifth Edition, September 2005
36	API MPMS 5.4	Chapter 5—Metering, Section 4—Accessory Equipment for Liquid Meters	§250.1202	L	Fourth Edition, September 2005
37	API MPMS 5.5	Chapter 5—Metering, Section 5—Fidelity and Security of Flow Measurement Pulsed-Data Transmission Systems	§250.1202	L	Second Edition, August 2005
38	API MPMS 5.6	Chapter 5 Section 6 Measurement of Liquid Hydrocarbons by Coriolis Meters	§250.1202(a)(2) and (3)	L	First Edition, reaffirmed March 2008
39	API MPMS 5.8	Chapter 5 Section 8 Measurement of Liquid Hydrocarbons by Ultrasonic Flow Meters Using Transit Time Technology	§250.1202(a)(2) and (3)	L	First Edition, February 2005
40	API MPMS 6.1	Chapter 6—Metering Assemblies, Section 1—Lease Automatic	§250.1202	L	Second Edition, May 1991; reaffirmed, April 2007

Item	SDO Number	Title	Referenced in current regulations at	Subpart	Edition Incorporated in current regulations
		Custody Transfer (LACT) Systems			
41	API MPMS 6.6	Chapter 6—Metering Assemblies, Section 6—Pipeline Metering Systems	§250.1202	L	Second Edition, May 1991; reaffirmed, February 2007
42	API MPMS 6.7	Chapter 6—Metering Assemblies, Section 7—Metering Viscous Hydrocarbons	§250.1202	L	Second Edition, May 1991; reaffirmed, April 2007
43	API MPMS 7	Chapter 7—Temperature Determination	§250.1202	L	First Edition, June 2001; reaffirmed, March 2007
44	API MPMS 8.1	Chapter 8—Sampling, Section 1—Standard Practice for Manual Sampling of Petroleum and Petroleum Products	§250.1202	L	Third Edition, October 1995; reaffirmed, March 2006
45	API MPMS 8.2	Chapter 8—Sampling, Section 2—Standard Practice for Automatic Sampling of Liquid Petroleum and Petroleum Products	§250.1202	L	Second Edition, October 1995; reaffirmed, June 2005
46	API MPMS 9.1	Chapter 9—Density Determination, Section 1—Standard Test Method for Density, Relative Density (Specific Gravity), or API Gravity of Crude Petroleum and Liquid Petroleum Products by Hydrometer Method	§250.1202(a)(3) and (l)(4)	L	Second Edition, December 2002; reaffirmed October 2005
47	API MPMS 9.2	Chapter 9—Density Determination, Section 2—Standard Test Method for Density or Relative Density of Light Hydrocarbons by Pressure Hydrometer	§250.1202	L	Second Edition, March 2003
48	API MPMS 10.1	Chapter 10—Sediment and Water, Section 1—Standard Test Method for Sediment in Crude Oils and Fuel Oils by the Extraction Method	§250.1202	L	Third Edition, November 2007
49	API MPMS 10.2	Chapter 10—Sediment and Water, Section 2—Determination of Water in Crude Oil by Distillation	§250.1202	L	Second Edition, November 2007
50	API MPMS 10.3	Chapter 10—Sediment and Water, Section 3—Standard Test Method for Water and Sediment in Crude Oil by the Centrifuge Method (Laboratory Procedure)	§250.1202	L	Third Edition, May 2008
51	API MPMS 10.4	Chapter 10—Sediment and Water, Section 4—Determination of Water and/or Sediment in Crude Oil by the Centrifuge Method (Field Procedure)	§250.1202	L	Third Edition, December 1999
52	API MPMS 10.9	Chapter 10—Sediment and Water, Section 9—Standard Test Method for Water in Crude Oils by Coulometric Karl Fischer Titration	§250.1202	L	Second Edition, December 2002; reaffirmed 2005
53	API MPMS 11.1- Volume 1	Chapter 11.1—Volume Correction Factors, Volume 1, Table 5A—Generalized Crude Oils and JP-4 Correction of Observed API Gravity to API Gravity at 60 °F, and Table 6A—Generalized Crude Oils and JP-4 Correction of Volume to 60 °F	§250.1202	L	First Edition, August 1980; reaffirmed August 1987

Item	SDO Number	Title	Referenced in current regulations at	Subpart	Edition Incorporated in current regulations
		Against API Gravity at 60 °F, API Standard 2540			
54	API MPMS 11.2.2	Chapter 11.2.2 —Compressibility Factors for Hydrocarbons: 0.350-0.637 Relative Density (60 °F/60 °F) and −50 °F to 140 °F Metering Temperature	§250.1202	L	Second Edition, October 1986, Reaffirmed Dec 2007
55	API MPMS 11.1	Chapter 11 Physical Properties Data, Section 1—Temperature and Pressure Volume Correction Factors for Generalized Crude Oils, Refined Products, and Lubricating Oils; May 2004, (incorporating Addendum 1, September 2007);	§250.1202(a)(2), (a)(3), (g), and (l)(4)	L	May 2004, (incorporating Addendum 1, September 2007)
56	API MPMS 12.2.1	Chapter 12—Calculation of Petroleum Quantities, Section 2—Calculation of Petroleum Quantities Using Dynamic Measurement Methods and Volumetric Correction Factors, Part 1—Introduction	§250.1202	L	Second Edition, May 1995; reaffirmed March 2002
57	API MPMS 12.2.2	Chapter 12—Calculation of Petroleum Quantities, Section 2—Calculation of Petroleum Quantities Using Dynamic Measurement Methods and Volumetric Correction Factors, Part 2—Measurement Tickets	§250.1202	L	Third Edition, June 2003
58	API MPMS 12.2.3	Chapter 12 Section 2 Calculation of Petroleum Quantities Using Dynamic Measurement Methods and Volumetric Correction Factors, Part 3—Proving Reports	§250.1202(a)(2), (a)(3), and (g)	L	First Edition, Oct 1998 reaffirmed 2009
59	API MPMS 12.2.4	Chapter 12 Calculation of Petroleum Quantities, Section 2—Calculation of Petroleum Quantities Using Dynamic Measurement Methods and Volumetric Correction Factors, Part 4—Calculation of Base Prover Volumes by the Waterdraw Method	250.1202(a)(2), (a)(3), (f)(1), and (g)	L	First Edition Dec 1997, Reaffirmed March 2009
60	API MPMS 14.3.1	Chapter 14—Natural Gas Fluids Measurement, Section 3—Concentric, Square-Edged Orifice Meters, Part 1—General Equations and Uncertainty Guidelines	§250.1203	L	Third Edition, September 1990; reaffirmed January 2003
61	API MPMS 14.3.2	Chapter 14—Natural Gas Fluids Measurement, Section 3—Concentric, Square-Edged Orifice Meters, Part 2—Specification and Installation Requirements	§250.1203	L	Fourth Edition, April 2000; reaffirmed March 2006
62	API MPMS 14.3.3	Chapter 14—Natural Gas Fluids Measurement, Section 3—Concentric, Square-Edged Orifice Meters; Part 3—Natural Gas Applications	§250.1203	L	3rd Edition, August 1992; Errata March 1994, reaffirmed, February 2009

Item	SDO Number	Title	Referenced in current regulations at	Subpart	Edition Incorporated in current regulations
63	API MPMS 14.5	Chapter 14.5/GPA Standard 2172-09; Calculation of Gross Heating Value, Relative Density, Compressibility and Theoretical Hydrocarbon Liquid Content for Natural Gas Mixtures for Custody Transfer	§250.1203	L	3rd Edition, January 2009
64	API MPMS 14.6	Chapter 14—Natural Gas Fluids Measurement, Section 6—Continuous Density Measurement	§250.1203	L	2nd Edition, April 1991; reaffirmed, Mar 2006
65	API MPMS 14.8	Chapter 14—Natural Gas Fluids Measurement, Section 8—Liquefied Petroleum Gas Measurement	§250.1203	L	2nd Edition, July 1997; reaffirmed, March 2006
66	API MPMS 20.1	Chapter 20—Section 1—Allocation Measurement	§250.1202	L	1st Edition, September 1993; reaffirmed October 2006
67	API MPMS 21.1	Chapter 21—Flow Measurement Using Electronic Metering Systems, Section 1—Electronic Gas Measurement	§250.1203	L	1st Edition, August 1993; reaffirmed, July 2005
68	API MPMS 21.2	Chapter 21 Flow Measurement Using Electronic Metering Systems, Section 2—Electronic Liquid Volume Measurement Using Positive Displacement and Turbine Meters	§250.1202(a)(2)	L	First Edition, June 1998
69	API MPMS 21.2A	Chapter 21 Flow Measurement Using Electronic Metering Systems, Addendum to Section 2—Flow Measurement Using Electronic Metering Systems, Inferred Mass; First Edition, reaffirmed February 2006	§250.1202(a)	L	First Edition Aug 2000, reaffirmed February 2006
70	API RP 2A-WSD	Recommended Practice for Planning, Designing and Constructing Fixed Offshore Platforms—Working Stress Design	§§250.901, 250.908, 250.919, and 250.920	I	21st Edition, December 2000; Errata and Supplement 1, December 2002; Errata and Supplement 2, September 2005; Errata and Supplement 3, October 2007
71	API RP 2D	Operation and Maintenance of Offshore Cranes	§250.108	A	6th Edition, May 2007
72	API RP 2FPS	RP for Planning, Designing, and Constructing Floating Production Systems	§250.901	I	1st Edition, March 2001
73	API RP 2I	In-Service Inspection of Mooring Hardware for Floating Structures	§250.901(a) and (d)	I	3rd Edition, April 2008
74	API RP 2N	Recommended Practice for Planning, Designing, and Constructing Structures and Pipelines for Arctic Conditions	§250.470(g)	D	3rd Edition, April 2015

Item	SDO Number	Title	Referenced in current regulations at	Subpart	Edition Incorporated in current regulations
75	API RP 2RD	Recommended Practice for Design of Risers for Floating Production Systems (FPSs) and Tension-Leg Platforms (TLPs)	§§250.292, 250.733, 250.800(c), 250.901(a), (d), and 250.1002(b)	B, G, H, I, J	1st Edition, June 1998; reaffirmed, May 2006, Errata, June 2009
76	API RP 2SK	Recommended Practice for Design and Analysis of Stationkeeping Systems for Floating Structures	§§250.800(c) and 250.901(a), (d)	H, I	3rd Edition, October 2005, Addendum, May 2008, Reaffirmed June 2015
77	API RP 2SM	Recommended Practice for Design, Manufacture, Installation, and Maintenance of Synthetic Fiber Ropes for Offshore Mooring	§§250.800(c) and 250.901	H, I	1st Edition, March 2001, Addendum, May 2007
78	API RP 2T	Recommended Practice for Planning, Designing, and Constructing Tension Leg Platforms	§250.901	I	2nd Edition, August 1997
79	ANSL/API RP 14B	Recommended Practice for Design, Installation, Repair and Operation of Subsurface Safety Valve Systems	§§250.802(b), 250.803(a), 250.814(d), 250.828(c), and 250.880©	H	6th Edition Sept 2015
80	API RP 14C	Recommended Practice for Analysis, Design, Installation, and Testing of Basic Surface Safety Systems for Offshore Production Platform	§§250.125(a), 250.292(j), 250.841(a), 250.842(a), 250.850, 250.852(a), 250.855, 250.856(a), 250.858(a), 250.862(e), 250.865(a), 250.867(a), 250.869(a) through (c), 250.872(a), 250.873(a), 250.874(a), 250.880(b) and (c), 250.1002(d), 250.1004(b), 250.1628(c) and (d), 250.1629(b), and 250.1630(a);	A, B, H, J, P	7th Edition, March 2001, Reaffirmed: March 2007;
	API RP 14E	Recommended Practice for Design and Installation of Offshore Production Platform Piping Systems	§§250.841(b), 250.842(a), and 250.1628(b) and (d)	H, P	5th Edition, October 1991; Reaffirmed, January 2013
82	API RP 14F	Recommended Practice for Design, Installation, and Maintenance of Electrical Systems for Fixed and Floating Offshore Petroleum Facilities for Unclassified and Class 1, Division 1 and Division 2 Locations, Upstream Segment	§§250.114(c), 250.842(b), 250.862(e), and 250.1629(b)	A, H, P	5th Edition, July 2008, Reaffirmed: April 2013;

Item	SDO Number	Title	Referenced in current regulations at	Subpart	Edition Incorporated in current regulations
83	API RP 14FZ	Recommended Practice for Design and Installation of Electrical Systems for Fixed and Floating Offshore Petroleum Facilities for Unclassified and Class I, Zone 0, Zone 1 and Zone 2 Locations	§§250.114(c), 250.842(b), 250.862(e), and 250.1629(b)	A, H, P	2nd Edition, May 2013
84	API RP 14G	Recommended Practice for Fire Prevention and Control on Fixed Open-type Offshore Production Platforms	§§250.859(a), 250.862(e), 250.880(c), and 250.1629(b)	H, P	4th Edition, April 2007, reaffirmed Jan 2013
85	API RP 14J	Recommended Practice for Design and Hazards Analysis for Offshore Production Facilities	§§250.800(b) and (c), 250.842(b), and 250.901(a)	H, I	2nd Edition, May 2001; Reaffirmed: January 2013
86	ANSI/API Recommended Practice 17H	Remotely Operated Tools and Interfaces on Subsea Production Systems	§250.734	G	Second Edition, June 2013; Errata, January 2014
87	API RP 65-1	Recommended Practice for Cementing Shallow Water Flow Zones in Deepwater Wells	§250.415	D	1st Edition, September 2002
88	API RP 75	Recommended Practice for Development of a Safety and Environmental Management Program for Offshore Operations and Facilities	§§250.1900, 250.1902, 250.1903, 250.1909, 250.1920	S	Third Edition, May 2004, Reaffirmed May 2008
89	API RP 86	API Recommended Practice for Measurement of Multiphase Flow	§250.1202(a)(2), (a)(3), and §250.1203(b)(2)	L	First Edition, September 2005 (File Available)
90	API RP 90	Annular Casing Pressure Management for Offshore Wells	§250.518	E	First Edition, August 2006
91	API RP 500	Recommended Practice for Classification of Locations for Electrical Installations at Petroleum Facilities Classified as Class I, Division 1 and Division 2	§§250.114(a), 250.459, 250.842(a), 250.862(a) and (e), 250.872(a), 250.1628(b) and (d), and 250.1629(b)	A, D, H, P	Third Edition December 2012; ERRATA: JANUARY 2014
92	API RP 505	Recommended Practice for Classification of Locations for Electrical Installations at Petroleum Facilities Classified as Class I, Zone 0, Zone 1, and Zone 2	§§250.114(a), 250.459, 250.842(a), 250.862(a) and (e), 250.872(a), 250.1628(b) and (d), and 250.1629(b);	A, D, H, P	First Edition, November 1997; Reaffirmed, August 2013
93	API RP 2556	Recommended Practice for Correcting Gauge Tables for Incrustation	§250.1202	L	Second Edition, August 1993; reaffirmed November 2003
94	API Spec. 2C	Specification for Offshore Pedestal Mounted Cranes	§250.108	A	Sixth Edition, March 2004, Effective Date: September 2004;

Item	SDO Number	Title	Referenced in current regulations at	Subpart	Edition Incorporated in current regulations
95	ANSI/API Specification 6A (ANSI/API Spec. 6A),	Specification for Wellhead and Christmas Tree Equipment	§§250.730, 250.802(a), 250.803(a), 250.833, 250.873(b), 250.874(g), and 250.1002(b)	G, H, J	Twentieth Edition, October 2010; Addendum 1, November 2011; Errata 2, November 2011; Addendum 2, November 2012; Addendum 3, March 2013; Errata 3, June 2013; Errata 4, August 2013; Errata 5, November 2013; Errata 6, March 2014; Errata 7, December 2014; Errata 8, February 2016; Addendum 4, June 2016; Errata 9, June 2016; Errata 10, August 2016
96	API Spec. 6AV1	Specification for Verification Test of Wellhead Surface Safety Valves and Underwater Safety Valves for Offshore Service	§§250.802(a), 250.833, 250.873(b), and 250.874(g)	H	Second Edition, February 2013
97	API STD 6AV2	Installation, Maintenance, and Repair of Surface Safety Valves and Underwater Safety Valves Offshore	§§250.820, 250.834, 250.836, and 250.880(c)	H	First Edition, March 2014; Errata 1, August 2014
98	ANSI/API Spec. 6D	Specification for Pipeline Valves	§250.1002	J	Twenty-third Edition, April 2008; Effective Date: October 1, 2008, Errata 1, June 2008; Errata 2, November 2008; Errata 3, February 2009; Addendum 1, October 2009;
99	ANSI/API Specification 11D1	Packers and Bridge Plugs	§§250.518, 250.619, and 250.1703	E, F, Q	Second Edition, July 2009
100	ANSI/API Spec. 14A	Specification for Subsurface Safety Valve Equipment	§§250.802(b) and 250.803(a)	H	Eleventh Edition, October 2005, Reaffirmed, June 2012;
101	ANSI/API Specification 16A	Specification for Drill-through Equipment	§250.730	G	Third Edition, June 2004, Reaffirmed August 2010
102	ANSI/API Specification 16C	Specification for Choke and Kill Equipment	§250.730	G	1st Edition, January 1993, Reaffirmed July 2010
103	API Specification 16D	Specification for Control Systems for Drilling Well Control Equipment and Control Systems for Diverter Equipment	§250.730	G	2nd Edition, July 2004, Reaffirmed August 2013

Item	SDO Number	Title	Referenced in current regulations at	Subpart	Edition Incorporated in current regulations
104	ANSI/API Specification 17D	Design and Operation of Subsea Production Systems—Subsea Wellhead and Tree Equipment	§250.730	G	2nd Edition, May 2011
105	ANSI/API Spec. 17J	Specification for Unbonded Flexible Pipe	§§250.852(e), 250.1002(b), and 250.1007(a)	H, J	Third Edition, July 2008
106	ANSI/API Specification Q1 (ANSI/API Spec. Q1)	Specification for Quality Programs for the Petroleum, Petrochemical and Natural Gas Industry	§§250.730, 250.801(b) and ©	G, H	9th Ed. June 1, 2014; ERTA: February 2014; ERTA 2: March 2014; ADD 1: June 2016
107	API STANDARD 53	Blowout Prevention Equipment Systems for Drilling WellS	§§250.730, 250.735, 250.737, and 250.739	G	4th Edition, November 2012
108	API Standard 65—Part 2	Isolating Potential Flow Zones During Well Construction	§250.415	D	Second Edition, December 2010
109	API Standard 2552	USA Standard Method for Measurement and Calibration of Spheres and Spheroids	§250.1202	L	First Edition, 1966; reaffirmed, October 2007
110	API Standard 2555	Method for Liquid Calibration of Tanks	§250.1202	L	First Edition, September 1966; reaffirmed March 2002;
111	ASTM Standard C 33-07	Standard Specification for Concrete Aggregates	§250.901	I	Edition approved December 15, 2007
112	ASTM Standard C 94/C 94M-07	Standard Specification for Ready-Mixed Concrete	§250.901	I	Edition approved January 1, 2007
113	ASTM Standard C 150-07	Standard Specification for Lightweight Aggregates for Structural Concrete	§250.901	I	Edition approved May 1, 2007
114	ASTM Standard C 330-05	Standard Specification for Lightweight Aggregates for Structural Concrete	§250.901	I	Edition approved December 15, 2005
115	ASTM Standard C 595-08	Standard Specification for Blended Hydraulic Cements	§250.901	I	Edition approved January 1, 2008
116	AWS D1.1:2000	Structural Welding Code—Steel, 17th Edition	§250.901	I	Edition approved October 18, 1999
117	AWS D1.4-98	Structural Welding Code—Reinforcing Steel	§250.901	I	1998 Edition
118	AWS D3.6M:1999	Specification for Underwater Welding (1999)	§250.901	I	1999 Edition
119	NACE Standard MR0175-2003	Metals for Sulfide Stress Cracking and Stress Corrosion Cracking Resistance in Sour Oilfield Environments	§§250.901 and 250.490	D, I	Revised January 17, 2003
120	NACE Standard RP0176-2003	Corrosion Control of Steel Fixed Offshore Structures Associated with Petroleum Production	§250.901	I	2003 EDITION
121	ISO/IEC (International Electrotechnical Commission) 17011	General requirements for accreditation bodies accrediting conformity assessment bodies	§§250.1900, 250.1903, 250.1904, and 250.1922	S	First edition 2004-09-01; Corrected version 2005-02-15
122	ISO 17021-1	Conformity assessment - Requirements for bodies providing audit and certification of management systems - Part 1: Requirements	§§250.730(d)	G	First Edition, August 2015
123	COS Safety Publication COS-2-01	Qualification and Competence Requirements for Audit Teams and Auditors Performing Third-party SEMS Audits of Deepwater Operations	§§250.1900, 250.1903, 250.1904, and 250.1921	S	First Edition, Effective Date October 2012
124	COS Safety Publication COS-2-03	Requirements for Third-party SEMS Auditing and Certification of Deepwater Operations	§§250.1900, 250.1903, 250.1904, and 250.1920	S	First Edition, Effective Date October 2012

Item	SDO Number	Title	Referenced in current regulations at	Subpart	Edition Incorporated in current regulations
125	COS Safety Publication COS-2-04	Requirements for Accreditation of Audit Service Providers Performing SEMS Audits and Certification of Deepwater Operations	§§250.1900, 250.1903, 250.1904, and 250.1922	S	First Edition, Effective Date October 2012

Appendix B: Code of Federal Regulations – Incorporation by Reference text in-full

What is incorporation by reference?
Incorporation by reference was established by statute and allows Federal agencies to meet the requirement to publish regulations in the Federal Register by referring to materials already published elsewhere. For an incorporation to be valid, the Director of the Federal Register must approve it. The legal effect of incorporation by reference is that the material is treated as if it were published in full in the Federal Register (5 U.S.C. 552(a)). This material, like any other properly issued regulation, has the force of law.

What is a proper incorporation by reference?
The Director of the Federal Register will approve an incorporation by reference only when the requirements of 1 CFR part 51 are met. Some of the elements on which approval is based are:

a) The incorporation will substantially reduce the volume of material published in the Federal Register.
b) The matter incorporated is in fact available to the extent necessary to afford fairness and uniformity in the administrative process.
c) The incorporating document is drafted and submitted for publication in accordance with 1 CFR part 51.

What if the material incorporated by reference cannot be found?
If you have any problem locating or obtaining a copy of material listed as an approved incorporation by reference, please contact the agency that issued the regulation containing that incorporation. If, after contacting the agency, you find the material is not available, please notify the Director of the Federal Register, National Archives and Records Administration, 8601 Adelphi Road, College Park, MD 20740-6001, or call 202-741-6010.[2]

[2] Mineral Resources | Chapter II: Bureau of Safety and Environmental Enforcement, Department of the Interior | Subchapter B: Offshore, 30 CFR 198.250, pg. vi)

Appendix C: API RP 2A-LRFD/API RP 2A-WSD Workshop Attendance

Alban Proietto, Kent	Greg Kusinski, Chevron	Pamela Hidinger, Oxy
Albert Ku, DNV	Jim Kaculi, Chevron	Peter Hopkins, Shell
Alex Alvarado, Project Consulting	Julian Pham, BSEE	Sanjay Sahasrabudhe, Chevron
Alton Payne, BSEE	Justin Nelson, Arena	Sean Marshall, EEC Testing Service
Brian Skeels, TechnipFMC	Liqun Yang, DNV	Stephanie Kusinski, OOC
Evan Zimmerman, OOC	Marc Paquette, Shell	Tim Charters, API
Grayson Ridgway, API	Maria Olboh, Shell	Xioyan Yan, Chevron

Appendix D: 2025 Workshop Agenda

2025 OOC / API Referenced Standards Workshop Agenda

April 10, 2025 | 8:30 am - 4 pm
API Office
15377 Memorial Drive, Suite 250
Houston, TX 77079 and virtual

***Workshop Objective**:*
The 2025 OOC/API Referenced Standards Workshop will provide an opportunity for an in-depth discussion, primarily reviewing the standards that we have previously recommended since this process began in 2020.

During this review, we will determine if any of our previous recommendations have changed. This can include changes to the Add, Update, or Remove recommendations, changes to the Edition number recommended for incorporation, and/or changes to the priority level. There is also an opportunity for industry SMEs to suggest additional standards for consideration and discussion.

The outcome of these discussions will formulate this year's document, expected to be published in the Fall 2025. The final document will be shared with BSEE and provide sound reasoning to the recommendations, established from consensus during the workshop and the other related meetings.

All industry SMEs are encouraged to participate and to provide feedback during the discussion.

Workshop Notes:

- ***Discussion times are approximate**. We will do our best to adhere to the schedule as listed below. However, given the expected conversational nature of this event, the expected times may run short / long. We will adjust as needed. If you are joining remotely and are not planning on attending the full day, we encourage you to join with the meeting link provided to you early to ensure participation in the topics you are interested in contributing to.*
- *Appendix A of this document lists all standards that were included in the "Oil and Gas and Sulfur Operations in the Outer Continental Shelf-Documents Incorporated by Reference" NPRM, published in the Federal Register in November 2023. These standards are not available for discussion due to the constraints of discussion of active rulemaking. OOC and API submitted our comments to the NPRM and industry awaits publication of the final rule.*

AGENDA

TOPIC	DISCUSSION LEAD	TIME (CT)
Check-in / Networking *(for in-person attendees)*		8 - 8:30 am
Welcome, Safety Briefing, Meeting Protocols	API Staff / Stephanie Kusinski (OOC)	8:30 - 8:35 am
Workshop Overview (Scope, Goals, Summary of previous work, Core activities vs. sharing activities)	Greg Kusinski (Chevron), Brian Skeels (TechnipFMC), Alton Payne (BSEE)	8:35 - 8:45 am
Update from BSEE (Next steps for the OOC / API referenced standards group, standards and regulatory updates	BSEE staff	8:45 - 9:00 am
API Subcommittee 2 and Related Standards (ACI & COS): • ***API 2A-LRFD***: Recommended Practice for Planning, Designing, and Constructing Fixed Offshore Platforms—Load and Resistance Factor Design; 2nd Edition (2019), Reaffirmed 2024 • ***API 2TOP***: Topsides Structure; 1st Edition (2019) • ***API BULLETIN 2INT-MET***: Interim Guidance on Hurricane Conditions in the Gulf of Mexico (2007) • ***ACI 318-19***: Building Code Requirements for Structural Concrete (1995) • ***COS 2-03***: Requirements for 3rd Party SEMS Auditing, 1st Edition (2012)	Group Discussion	9:00 - 10:30 am
Break		10:30 - 10:45 am
Design Standards (API, ANSI/ASME, NACE, AWS): • ***API Spec 17D***: Design & Spec of Subsea Production Systems - Subsea Wellhead and Tree Equipment, 2nd Edition (2011) • ***API Spec 6A***: Specification for Wellhead and Christmas Tree Equipment, 20th Edition (2016) • ***API RP 1111***: Design, Construction, Operation, and Maintenance of Offshore Hydrocarbon Pipelines (Limit State Design), 5th Edition (2015) • ***ASME BPVC - Section VIII***: Rules for Construction of Pressure Vessels (2017)	Group Discussion	10:45 am - 12:30 pm

• ***NACE STD MR0175-2003***: Metals for Sulfide Stress Cracking and Stress Corrosion Cracking Resistance in Sour Oilfield Environments • ***AWS D1.1:2000***: Structural Welding Code - Steel, 17th Edition (1999) • ***NACE STD MR0175-2003***: Metals for Sulfide Stress Cracking and Stress Corrosion Cracking Resistance in Sour Oilfield Environments • ***ANSI/ASME B31.8 - 2003***: Gas Transmission and Distribution Piping Systems (2004) • ***ANSI/ASME B16.5-2003***: Pipe Flanges And Flanged Fittings: NPS 1/2 Through 24 (2003) • ***ANSI/ASME VIII D1 2017***: Pipe Flanges And Flanged Fittings: NPS 1/2 Through 24 (2017) • ***ANSI/ASME VIII D2 2017***: Boiler and Pressure Vessel Code, Section VIII, Rules for Construction of Pressure Vessels; Divisions 2 (2017) • ***NACE RP 0176-2003***: Corrosion Control of Steel Fixed Offshore Platforms Associated with Petroleum Production (2003)		
Lunch		12:30 - 1:30 pm
API 17 Series Standards (Subsea Systems & Well Intervention): • ***API RP 17V***: Recommended Practice for Analysis, Design, Installation, and Testing of Safety Systems for Subsea Applications, 1st Edition • ***API SPEC 14L***: Lock Mandrels & Landing Nipples, 3rd Edition • ***API SPEC 11D1***: Packers and Bridge Plugs, 2nd Edition • ***API STD 17G***: Design and Manufacture of Subsea Well Intervention Equipment, 3rd Edition • ***API RP 17G1***: System Configuration and Operation for Subsea Well Intervention Systems, 1st Edition • ***API RP 17G5***: Subsea Intervention Workover Control Systems, 1st Edition • ***API STD 17O***: Standard for Subsea High Integrity Pressure Protection Systems (HIPPS), 2nd Edition (2014), Reaffirmed 2019	Group Discussion	1:30 - 3:00 pm
Break		3:00 - 3:15 pm
Discussion of newly presented standards	Group Discussion	3:15 - 3:45 pm
Adjourn		4:00 pm

Appendix E: 2025 Workshop Attendance

In-person attendance:

Name	**Company**
Alton Payne	BSEE
Evan Zimmerman	OOC
Greg Kusinski	Chevron
Julian Pham	BSEE
Scott Chroninger	Chevron
Sonia Furtado	DNV
Stephanie Kusinski	OOC
Steve Gunzelman	KBR (retired)
Tim Charters	API

Appendix F: Secondary References Discussion Attendance

Alban Proietto, Kent	Grayson Ridgway, API	Roland Goodman, API
Alex Alvarado, Project Consulting	Greg Kusinski, Chevron	Scott Chroninger, Chevron
Alton Payne, BSEE	Jennifer Vann, Chevron	Stephanie Kusinski, OOC
Arash Zakeri, bp	Julian Pham, BSEE	Tim Charters, API
David Petruska, bp	Katie Burkle, API	Todd Murphy, W&T
David Short	Zhiling Li, bp	Brian Reith, Shell
Erik Case, Chevron	Peter Hopkins, Shell	Fraser Munro, bp
Evan Zimmerman, OOC	Phillip Smith, BSEE	
Frank Adamek, DOT	Raja Roy, Kent	