



OSHA REGIONAL INSTRUCTION

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

DIRECTIVE NUMBER: BHM-CPL-04-00-004

SUBJECT: Regional Emphasis Program for the Upstream Oil and Gas Industry

REGION: Birmingham Region

SIGNATURE DATE: July 30, 2026

EFFECTIVE DATE: October 1, 2026

ABSTRACT

Purpose: The purpose of this instruction is to renew a Regional Emphasis Program (REP) to reduce accidents, fatalities, and catastrophic events in the upstream oil and gas industry.

Scope: This Instruction applies to all Birmingham Region Federal Offices.

References: See [Section III](#).

Cancellations: This instruction supersedes OSHA Regional Instruction BHM-CPL-04-00-004, Regional Emphasis Program for the Upstream Oil and Gas Industry, April 17, 2025.

State Impact: No Impact.

Action Offices: Baton Rouge, Birmingham, Jackson, Little Rock, Mobile, and Nashville Federal Offices.

Originating Office: Birmingham Regional Office

Contact: Assistant Regional Administrator for Enforcement Programs

By and Under the Authority of

Dorinda Hughes
Regional Administrator

Executive Summary

This instruction reissues an enforcement initiative to reduce fatalities and catastrophic events in the upstream oil and gas industry as part of the OSHA regional realignment. The specified target industries are Drilling Oil and Gas Wells – NAICS Code 213111, Support Activities for Oil and Gas Operations NAICS Code 213112, Oil and Gas Field Services –NAICS Code 213118, Oil and Gas Pipeline and Related Structures Construction NAICS Code – 237120, Site Preparation Contractors - NAICS Code 238910, Geophysical Surveying and Mapping Services - NAICS Code 541360.

Significant Changes

- Birmingham, Mobile, and Jackson Area Offices Added.
- Updated the OSHA Information System inspection numbers.
- Updated Bureau of Labor Statistics charts and information.

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I. Purpose.

This instruction renews an enforcement initiative to reduce accidents, fatalities and catastrophic events in the upstream oil and gas industry as part of the OSHA region realignment. The specified target industries are Drilling Oil and Gas Wells – NAICS Code 213111, Support Activities for Oil and Gas Operations NAICS Code 213112, Oil and Gas Field Services –NAICS Code 213118, Oil and Gas Pipeline and Related Structures Construction NAICS Code – 237120, Site Preparation Contractors - NAICS Code 238910, Geophysical Surveying and Mapping Services - NAICS Code 541360.

II. Scope.

This instruction applies to all Birmingham Region Federal Offices.

III. References.

- A. [OSHA Instruction CPL 02-00-025, Scheduling System for Programmed Inspections](#), January 4, 1995, or current update.
- B. [OSHA Instruction CPL 02-00-170, Enforcement Exemptions and Limitations under the Annual Appropriations Act](#), July 18, 2024, or current update.
- C. [OSHA Instruction CPL 02-00-155, Inspection Scheduling for Construction, September 6, 2013](#), or current update.
- D. [OSHA Instruction CPL 02-00-164, Field Operations Manual \(FOM\)](#), February 9, 2026, or current update.
- E. [OSHA Instruction CSP 03-02-004, OSHA Strategic Partnership Program for Worker Safety and Health](#), May 13, 2025, or current update.
- F. [OSHA Instruction CPL 04-00-002, Procedures for Approval of Local Emphasis Programs \(LEP\)](#), November 13, 2018, or current update.

IV. Cancellations.

This instruction cancels OSHA Regional Instruction BHM-CPL-04-00-004, Regional Emphasis Program for the Upstream Oil and Gas Industry, April 17, 2025.

V. Action Offices.

- A. **Responsible Office.**
Birmingham Regional Office
- B. **Action Offices.**
Baton Rouge, Birmingham, Jackson, Little Rock, Mobile, and Nashville Federal Area Offices.
- C. **Information Offices.**
Baton Rouge, Birmingham, Jackson, Little Rock, Mobile, and Nashville Federal Area Offices.

VI. Federal Program Change.

None.

VII. Expiration.

This Instruction expires five years after effective date but may be renewed as necessary.

VIII. Significant Changes.

A. Update OSHA Information System statistical data.

B. Update Bureau of Labor Statistics Industry information.

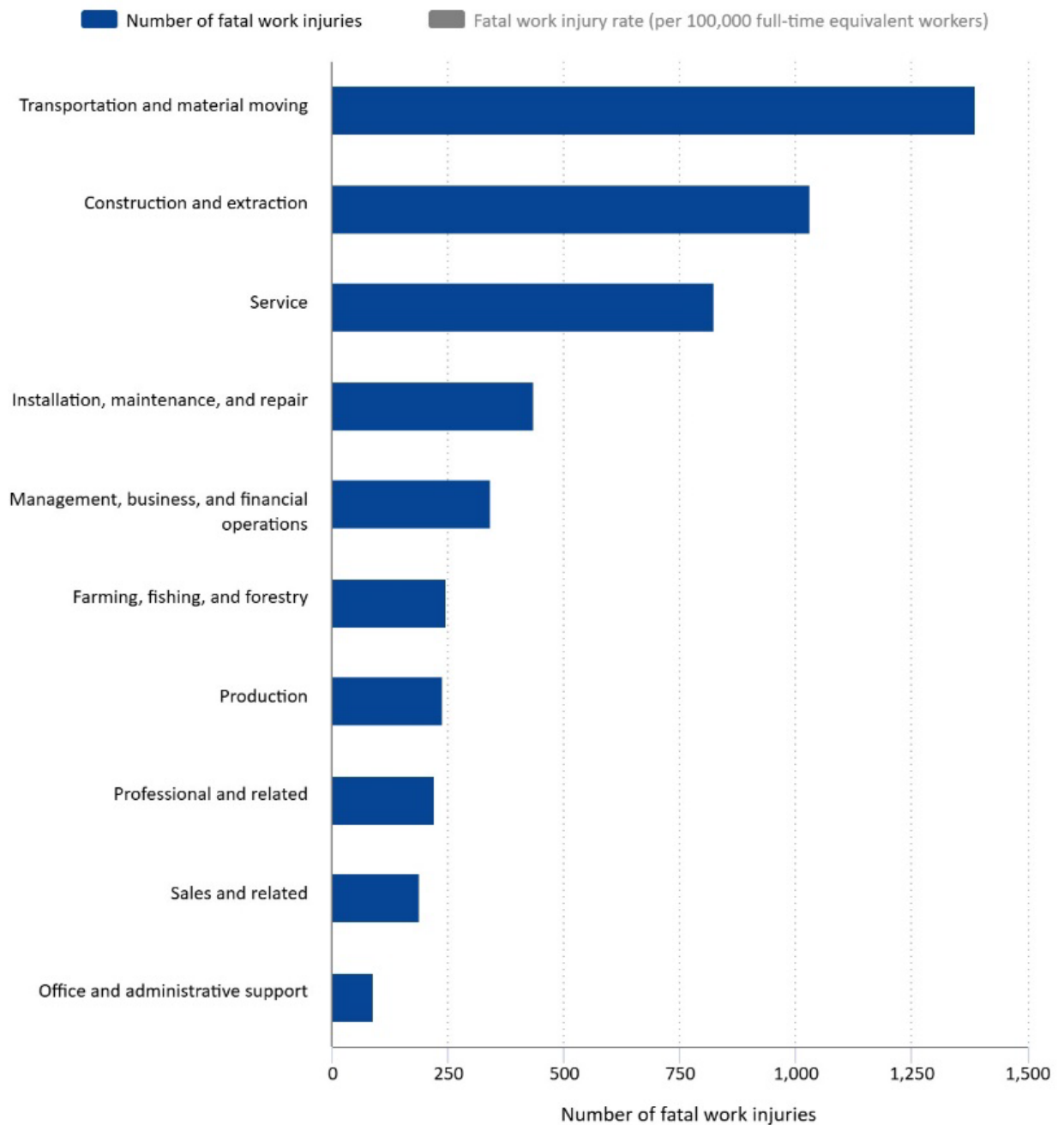
IX. Background.

Inspections under this REP include activities such as, but not limited to, drilling, exploration, well workover, and servicing. Since OSHA has no national program to address hazards in this industry, a local emphasis program is necessary to address the fatalities/catastrophes and severe injuries and illness occurring within this jurisdiction.

Throughout the United States, workers in construction and extraction occupations had the second most fatalities [\(1,034\) in 2024](#) compared to other occupation groups. Falls, slips, or trips were the events precipitating [844](#) of these fatalities. The fatality rate for this occupation group increased from 13.0 deaths per 100,000 FTE workers in 2022 to [13.8 in 2024](#).

Number and rate of fatal work injuries, by selected private industries, 2024		
Industry	Number of fatal work injuries	Fatal work injury rate (per 100,000 full-time equivalent workers)
Construction	1,034	9.2
Transportation and warehousing	865	12.2
Agriculture, forestry, fishing, and hunting	475	20.9
Manufacturing	353	2.4
Leisure and hospitality	273	2.4
Retail trade	258	1.8
Other services (exc. Public admin.)	236	3.3
Educational and health services	160	0.7
Wholesale trade	145	4.6
Mining, quarrying, and oil and gas extraction	92	13.8
https://www.bls.gov/charts/census-of-fatal-occupational-injuries/number-and-rate-of-fatal-work-injuries-by-industry.htm		

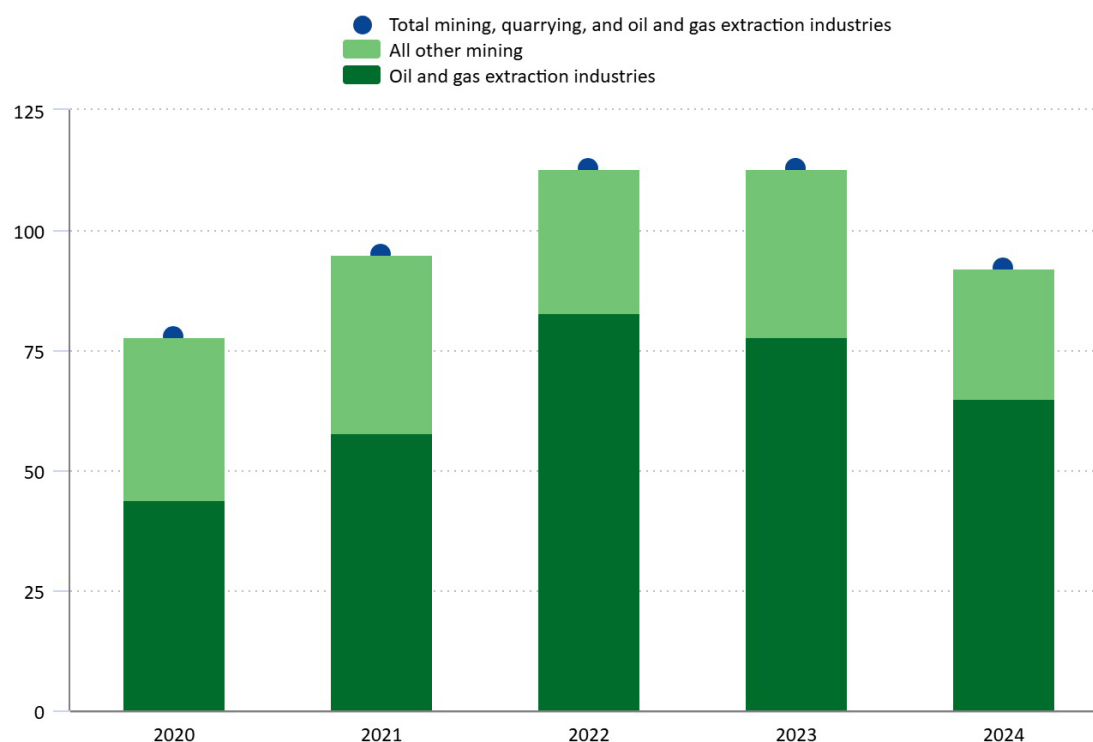
Number and rate of fatal work injuries, civilian workers, by major occupational group, 2024



Source: U.S. Bureau of Labor Statistics.



Fatal occupational injuries in private sector mining, quarrying, and oil and gas extraction industries



Source: U.S. Bureau of Labor Statistics.



<https://www.bls.gov/charts/census-of-fatal-occupational-injuries/fatal-occupational-injuries-private-sector-mining.htm>

Fatal occupational injuries in private sector mining, quarrying, and oil and gas extraction industries			
Year	Total mining, quarrying, and oil and gas extraction industries	All other mining	Oil and gas extraction industries
2020	78	34	44
2021	95	37	58
2022	113	30	83
2023	113	35	78
2024	92	27	65
Oil and gas extraction industries include oil and gas extraction (NAICS 211), drilling oil and gas wells (NAICS 213111), and support activities for oil and gas operations (NAICS 213112).			
https://www.bls.gov/charts/census-of-fatal-occupational-injuries/fatal-occupational-injuries-private-sector-mining.htm			

OSHA will employ several tools to address this issue, including enforcement, outreach, training, onsite consultation, partnerships, alliances, and the Voluntary Protection Program (VPP).

Activities involving the processing of the product which might come under the purview of Process Safety Management (PSM) are excluded from this program.

X. Enforcement.

- A. Hazards. Explosion, fire, fall, struck-by, caught-in, caught between, and electrocution hazards will be addressed because past inspection evidence suggests that these hazards are the leading causes of death within the oil and gas industry. Additionally, potential health hazards, such as but not limited to silica, noise and hydrogen sulfide, and other recognized health hazards will be evaluated. If necessary, a health referral will be made.
- B. Specific Industries. This Instruction is provided because of the continued need to address unsafe working conditions in the upstream oil and gas industry that contribute to workplace fatalities and injuries.

The specified target industries are:

- Drilling Oil and Gas Wells – NAICS Code 213111,
- Support Activities for Oil and Gas Operations - NAICS Code 213112,
- Oil and Gas Field Services – NAICS Code 213118,
- Oil and Gas Pipeline and Related Structures Construction - NAICS Code 237120,
- Site Preparation Contractors - NAICS Code 238910, and
- Geophysical Surveying and Mapping Services - NAICS Code 541360.

C. Scheduling Inspections.

1. Each Area Office having upstream oil and gas operations within its jurisdiction will divide the jurisdiction into geographic sectors. The office area will create no less than four sectors. If it is not possible to divide the area into four sectors, the Area Office will discuss this with the Regional Office, and they will agree on the number of sectors. This will be noted by the Area Office. Each geographic sector will be numbered consecutively, and a random number table applied to create a list. The list will be sorted in ascending order of random numbers assigned resulting in a list of geographic sectors for inspection. The sectors will be inspected in the order in which they appear on this list. The Area Office will ensure that each geographic sector is selected for inspection activity during the fiscal year.

The time allocated to conduct inspections within the geographic sector will depend on the number of sectors identified by the Area Office. For

example, if there are four sectors – a sector will be open for 90 days before a new sector can be opened.

2. Inspections under this Regional Emphasis Program will be initiated through either of the two following systems:
 - a. Compliance Safety & Health Officer (“CSHO”) observation of oil and gas activity as outlined in paragraph 3 below; or
 - b. Development of a list of known worksites where active drilling is taking place. The list can be generated through local media, internet searches, Railroad Commission website, etc. Inspections will be scheduled in accordance with the sector system as defined in paragraph 1 above.
3. Once the Area Office selects a sector for inspection, the Area Director will instruct CSHOs to be alert to oil and gas activity during their travels throughout the selected sector. Upon observing oil and gas activity at a work site, the CSHO will call the Area Director or Supervisor and provide as much information about the site as possible (e.g., the employer’s name, location, and any other available information) without entering the work site.
4. The Area Director or Supervisor will review the information to determine:
 1. whether the identified rig has been inspected within the selected sector during the previous 45 days; and
 2. whether the owner/operator of the rig has been inspected four (4) or more times under this REP during the sector timeframe established by paragraph X. C. 1.

If either condition applies, the Area Director or designee will direct the CSHO not to conduct an inspection. Otherwise, the Compliance Officer will conduct a comprehensive inspection of the rig.
5. For each sector, the Area Office will maintain a list of all rigs that have been identified.

The list will include the rig number, site location, and the employer’s name with a notation as to whether or not the rig was inspected. If the rig was not inspected, the Area Office will note the reason(s) why an inspection was not conducted.
6. During the opening conference, the CSHO will determine the number of employees employed during the last twelve months to determine if an

inspection is limited by the Enforcement Exemptions and Limitations under the Appropriations Act.

- D. Scope of REP Inspection. The inspections under this emphasis program will be comprehensive in nature covering the entire job site, in accordance with the FOM. All apparent potential safety and health hazards will be evaluated. If necessary, a health referral will be made. The inspection will evaluate the measures used by all employers at the site to manage the hazards associated with the oil and gas industry.

The CSHO will evaluate all on-site employers through inspection, observation, photographs, video footage, measurements, and interviews of management and employees.

- E. Citations. Citations for violations will be issued in accordance with FOM.
- F. Interface with Unprogrammed Activity. Reports of imminent danger, fatalities, catastrophes, complaints, and referrals will be scheduled as unprogrammed inspections, and shall be inspected in accordance with the applicable provisions of the FOM.
- G. Inspection Resources. Only trained CSHOs who have attended the OTI Oil and Gas course or who have experience in the oil and gas industry will be assigned to conduct inspections under this REP. All OSHA personnel participating in this REP must be familiar with the policies and procedures described in this instruction.
- H. CSHO Personal Protective Equipment (PPE). CSHOs will use personal protective equipment suitable for the target industry. PPE will include, at a minimum, respiratory protection (as necessary), a hard hat, safety glasses with side shields, safety shoes/boots (with metatarsal guards as necessary), hearing protection, and high visibility apparel/vest. CSHOs will wear non-sparking clothing such as natural fiber (e.g., cotton) and flame-resistant clothing (FRC). CSHOs will use direct reading monitors to ensure safe environments for conducting the inspection and use of non-intrinsically safe equipment such as cameras and cell phones. Employer's onsite policies and equipment will be referenced. All monitoring equipment employed by employer and OSHA, such as gas monitors for lower explosive limits (LEL) and personal alarms for H₂S and/or LEL will be verified as having current calibration and bump testing in accordance with the manufacturer's recommendations.

XI. Recording in OIS.

- A. Enforcement Inspections: Enforcement inspections completed under this initiative will be coded as follows in OIS under the Inspection Type sub-tab:

1. Initiating Type will be coded “Programmed Planned” except that any inspections conducted as a result of a complaint, referral, or fatality/catastrophe will be coded as the appropriate unprogrammed activity.
2. Regional Emphasis Program will be coded **OILGAS** for all programmed and unprogrammed inspections.
3. Additional Codes will be coded with any applicable additional codes.

B. Enforcement Interventions: Enforcement Interventions completed under this initiative, including partnerships, alliances, Voluntary Protection Programs, SHARP, and other interventions, will be coded:

In OIS in the Task sub tab, Task Details, Emphasis Areas as follows:

1. Local Emphasis Programs will be coded **OILGAS**.
2. Other Emphasis Areas will include any applicable additional codes and the codes specific to the activity covered by the inspection per XI.A.3.

C. Consultation Visits: Consultation Visits completed under this initiative will be coded:

1. In OIS on the Request Form:
 - a. Regional Emphasis will be coded **OILGAS**.
 - b. Any applicable additional codes and the codes specific to the activity covered by the visit.
2. In OIS on the Visit Form:
 - a. Regional Emphasis will be coded **OILGAS**.
 - b. Any applicable additional codes and the codes specific to the activity covered by the visit.

D. Compliance Assistance Activities: Compliance Assistance Activities completed under this initiative will be coded:

In OIS on the Compliance Assistance Activities Form:

1. Local Emphasis will be coded **OILGAS**.
2. Any applicable additional codes and the codes specific to the general industry activity covered by the outreach activity.
3. Area Offices, Consultation Projects, and the Regional Office shall periodically check their OIS databases to verify accuracy of the data for the initiative.

XII. Outreach.

All REPS must contain an outreach component that must be ongoing throughout the effective period of the program. These outreach efforts should be coordinated with or

include the consultation program for that area. The method of outreach is at the Area Directors discretion and can consist of one or more of the following components.

1. Broadcast mail-outs, emails, or program information
2. Stakeholder meetings
3. Targeted training sessions
4. Presentations to the affected group(s)

Before the Birmingham, Mobile, and Jackson Area Offices may initiate enforcement under this program, each will implement outreach programs supporting the goals of this program. The outreach efforts should occur at least three months before the initiation of inspections and continually after.

XIII. Partnerships and Alliances.

In the event outreach efforts result in the interest in developing an alliance or partnership the Area Director will ensure that these efforts conform to current National and Regional policy.

XIV. Evaluation.

The Regional Office will evaluate the impact of the REP at the midpoint of the program as well as at the expiration. Information and data from OIS along with input from the Area Directors will be used in program reports. Elements to be considered in the program report are contained in OSHA Instruction [CPL 04-00-002 Procedures for the Approval of Local Emphasis Programs \(LEPs\)](#).