MIOSHA

Michigan Occupational Safety and Health Administration (MIOSHA)
Department of Labor and Economic Opportunity (LEO)

AGENCY INSTRUCTION

DOCUMENT IDENTIFIER:	DATE:
MIOSHA-COM-22-2R2	January 20, 2026

SUBJECT: Oil and Gas Drilling and Servicing Operations - State Emphasis Program (SEP)

I. Purpose. This instruction establishes a state emphasis program (SEP) to reduce employee exposures to safety and health hazards during oil and gas drilling and servicing operations including hazards that can lead to fatalities.

II. Scope. This instruction applies to the Consultation Education and Training (CET) Division and the General Industry Safety and Health Division (GISHD).

III. References.

A. Agency Instruction MIOSHA-COM-04-1, Multi-Employer Work Sites, as amended.

B. Agency Instruction MIOSHA-COM-05-2, Abatement Assurance and Follow-up Inspection Procedures, as amended.

C. Agency Instruction MIOSHA-COM-13-1, Dual, One-MIOSHA, Intra-office Assistance, and Transfer of Inspections/Investigations, as amended.

D. Agency Instruction MIOSHA-COM-15-2, Horizontal or Vertical Standards – Determining Application, as amended.

E. Agency Instruction MIOSHA-COM-20-1, Companion and Expanded Inspections, as amended.

F. Executive Office of the President, Office of Management and Budget, North American Industry Classification System (NAICS) Manual, as amended.

G. General Industry and Construction Standard Part 451, Respiratory Protection (Part 451, Respiratory Protection).

H. General Industry Standard Part 2, Walking-Working Surfaces (Part 2, Walking-Working Surfaces).

I. General Industry Standard Part 8, Portable Fire Extinguishers (Part 8, Portable Fire Extinguishers).

J. General Industry Standard Part 13, Derricks (Part 13, Derricks).

K. General Industry Standard Part 33, Personal Protective Equipment (Part 33, Personal Protective Equipment).

L. General Industry Standard Part 57, Oil and Gas Drilling and Servicing Operations (Part 57).

M. General Industry Standard Part 92, Hazard Communication (Part 92, Hazard Communication).

N. General Industry Standard Part 301, Air Contaminants for General Industry (Part 301, Air Contaminants for General Industry).

O. Michigan Department of Environment, Great Lakes, and Energy, webpage, FAQ: Hydrogen Sulfide Gas (H2S).

P. MIOSHA Administrative Standard Part 11, Recording and Reporting of Occupational Injuries and Illnesses.

Q. MIOSHA Field Operations Manual, as amended (FOM).

R. National Institute for Occupational Safety and Health (NIOSH), webpage, Oil and Gas Extraction Program.

S. NIOSH, Oil and Gas Workers: How to Prevent Fatigued Driving Work, March 2018.

T. NIOSH-OSHA Hazard Alert, Health and Safety Risks for Workers Involved in Manual Tank Gauging and Sampling at Oil and Gas Extraction Sites, February 2016.

U. OSHA and National STEPS Network and NIOSH Alliance, Fatalities Associated with Hot Work on Oilfield Tanks, Tankers, and other related equipment, September 2016.

V. OSHA and National STEPS Network and NIOSH Alliance, Prevention of Fatalities from Ignition of Vapors by Mobile Engines and Auxiliary Motors, May 2017.

W. OSHA-NIOSH Hazard Alert, Worker Exposure to Silica during Hydraulic Fracturing, June 2012.

X. US Bureau of Labor Statistics (BLS), 2022 Census of Fatal Occupational Injuries (CFOI), Table A-1. Fatal occupational injuries by industry and event or exposure, all United States, 2022.

Y. US BLS, 2023 CFOI, Table A-1. Fatal occupational injuries by industry and event or exposure, all United States, 2023.

Z. US BLS, Occupational Employment and Wage Statistics, Sectors 21, 22, and 23: Mining, Quarrying, and Oil and Gas Extraction; Utilities; and Construction, May 2024.

AA. US Occupational Health and Safety Administration (OSHA), webpage, Oil and Gas Extraction.

IV. Distribution. MIOSHA Staff; Federal OSHA; S-drive Accessible; MIOSHA Messenger; and Internet Accessible.

V. Cancellations. All previous versions of this agency instruction.

VI. Next Review Date. This instruction will be reviewed one (1) year from date of issuance.

VII. History. History of previous versions includes:

MIOSHA-COM-22-2R1, April 24, 2024
MIOSHA-COM-22-2, December 5, 2022

VIII. Contact. Tarah M. Kile, CET Division Director; and Adrian Z. Rocskay, GISHD Director

IX. Originator. Barton G. Pickelman, Director

X. Background. MIOSHA has established this SEP to reduce employee exposures to safety and health hazards during oil and gas drilling, production, and servicing operations, especially those hazards that can lead to worker deaths. Nationally during 2022-2023, 161 fatalities occurred in the extraction industries (BLS, 2022 and 2023; NAICS 211, 213111, and 213112). In Michigan, there was a fatality in 2019 and again in 2021. These two deaths translate to a very high fatality rate for the oil and gas extraction industry in Michigan as it has relatively few employees; in May 2024 BLS counted only 800 workers in the state (i.e., oil and gas derrick operators, rotary drill operators, service unit operators, and roustabouts; employment cannot be ascertained for workers involved in support activities).

The causes of the fatalities in the industry nationally include vehicle incidents, contact injuries (struck by, caught between or crushed), fires and explosions, falls from a height, and exposure to harmful substances (hydrogen sulfide, hydrocarbons, and carbon monoxide).

Various operations and activities in this industry have been identified as risk factors for fatal incidents. Fatigued (drowsy) driving is a major cause of crashes in this industry, and crashes are the leading cause of death for oil and gas extraction workers (NIOSH, 2018). Fires and explosions have been started by hot work (OSHA and National STEPS Network and NIOSH Alliance, 2016) and ignition of vapors by mobile engines and auxiliary motors (OSHA and National STEPS Network and NIOSH Alliance, 2017).

Air contaminants pose a separate health hazard. Fracking operations can produce silica exposures over the permissible exposure limit; exposures occur during sand moving, sand transfer, and hot loading (NIOSH-OSHA, 2012). Sour well sites have high levels of hydrogen sulfide. Of the 10,652 producible oil wells in Michigan, 1,360 wells had hydrogen sulfide levels exceeding 300 ppm (EGLE, 2022), where 100 ppm is the level immediately dangerous to life or health (IDLH) and 15 ppm is the 15-minute, short-term exposure limit in Part 301, Air Contaminants for General Industry. Workers involved in manual gauging and sampling of tanks containing process fluids can be exposed to levels of hydrocarbons that are IDLH (NIOSH-OSHA, 2016). By targeting inspection activity in this industry, MIOSHA hopes to reduce or eliminate exposures to these hazards.

XI. Significant Changes.

A. Updated fatality and employment statistics. See Section X.

B. Updated outreach language throughout this instruction.

XII. Enforcement Activities.

A. All inspections under this SEP will be conducted by a team consisting of a safety officer (SO) and an industrial hygienist (IH).

B. Number of Inspections. MIOSHA will examine at least three worksites and conduct at least 12 inspections under this SEP each fiscal year.

C. Inspections will be part of the SEP and will be coded as such per section XII of this instruction if their scope involves determining the employer's compliance with Part 57. They would include:

1. Programmed inspection assignments issued under this SEP.

2. Complaint inspections, referral inspections, and fatality inspections for any establishment with a NAICS code of 211120 (Crude Petroleum Extraction), 211130 (Natural Gas Extraction), 213111 (Drilling Oil and Gas Wells), and 213112 (Support Activities for Oil and Gas Operations).

3. Follow-up inspections for any establishment with a NAICS code of 211120, 211130, 213111, and 213112.

D. Targeting. A targeting list of employers and worksites will be established using publicly available databases and information from other government agencies. From the list, employers and sites will be selected at random for a programmed inspection. Selection will attempt to include fracking operations and sour well sites.

XIII. Inspection Procedures.

A. Once an employer or site is selected for inspection, an inspection team consisting of an SO and an IH will be assigned to promptly conduct inspections. The SO and IH will open separate, dual inspections in line with Agency Instruction MIOSHA-COM-13-1, Dual, One-MIOSHA, Intra-office Assistance, and Transfer of Inspections/Investigations.

B. If a well site has multiple employers, as often is the case, the SO and IH will choose for inspection those employers with the highest probability of exposure to fatality hazards. The SO and IH will follow Agency Instruction MIOSHA-COM-04-1, Multi-Employer Work Sites. For example, the SO and IH may each choose two employers. These may or may not be the same employers depending on their exposure to safety versus health hazards.

C. The selection process described above will be repeated periodically during the fiscal year until at least three worksites have been inspected and until at least 12 inspections of oil and gas extraction operations have been conducted.

D. Scope of Inspection. The SO and IH shall evaluate the employer's compliance with Part 57 on all programmed inspections assigned under this SEP and on all unprogrammed activities (complaints, referrals, fatalities) alleging hazards at such worksites. In addition, if an SO or IH discovers potential hazards during an inspection not originally assigned to determine compliance with Part 57, the

SO/IH shall expand the investigation to address the hazards using the procedures in Agency Instruction MIOSHA-COM-20-1, Companion and Expanded Inspections. Per the FOM, if the inspection scope is partial, the SO/IH must expand the scope to address any potentially serious hazard in plain view or discovered during the inspection process. The SO/IH will be observant for and understand the hazards associated with oil and gas industries with a NAICS code of 211120, 211130, 213111, and 213112.

E. The SO and IH will evaluate the employer's compliance with any other applicable standards. These can include Part 8, Portable Fire Extinguishers; Part 13, Derricks; Part 33, Personal Protective Equipment; Part 451, Respiratory Protection; Part 11, Recording and Reporting of Occupational Injuries and Illnesses; Part 301, Air Contaminants for General Industry; Part 92, Hazard Communication; and Part 2, Walking-Working Surfaces. The SO/IH will ascertain whether any of the requirements of these standards are contained within Part 57 and use the direction in Agency Instruction, MIOSHA-COM-15-2, Horizontal or Vertical Standards – Determining Application, to cite the correct standard and rule.

F. Employer Resources. Employers will be directed to the NIOSH webpage and OSHA webpage for oil and gas extraction. The webpages contain numerous links to research, hazard alerts, and training materials.

XIV. Follow-Up Inspections.

A. If any violation has not been corrected within the time period specified on the citation, then a follow-up inspection shall be conducted in accordance with the FOM and Agency Instruction, MIOSHA-COM-05-2, Abatement Assurance and Follow-up Inspection Procedures.

B. Rule 1349 citations should be issued if there are only unabated other-than-serious citations, per Agency Instruction, MIOSHA-COM-05-2, Abatement Assurance and Follow-up Inspection Procedures.

C. For situations where follow-up inspections cannot be performed (for example, due to temporary, intermittent, or mobile operations), the enforcement division should, when possible, require the employer to provide written updates documenting the progress of abatement efforts.

XV. Outreach. CET will continue to make the public aware of the SEP through social media as well as notifications in newsletters when updated.

XVI. OSHA Information System (OIS) Coding. All enforcement inspections and compliance assistance interventions conducted under this SEP shall be coded in OIS as "OILGAS" under the State Emphasis Program field in the Inspection Data section.