

**Michael Davis** • To innovate first you must develop and then prove its validity and worth and then to teach you must show its practicality in application and to share values you must imply and demonstrate their worth in order to inspire their adoption. Not everyone will adopt prudent values and those must pay the costs of their lacking and thus adoption will be by both incentive (reward) and disincentive (punishment). The enlightenment has been to shine the light on the consequences (Macondo press). The problem with low incident high consequence failures is that they rarely occur and even the most imprudent or otherwise lacking operator can point to results as demonstrating performance while it is only luck. This simply makes allocating resources to diligently developing drilling process safety easy to ignore and sweep under the rug, except for government mandated reforms. The truth is if companies will allocate time and resources unilateral of the government the reforms would be more appropriate and end up saving companies engaged in drilling trillions of dollars in a short while simply by showing the government a better system thus enabling them to reform codes of more costly "redtape" and procedures subsequent to the demonstration. The fear of the unknown has some leaders scrambling for the proverbial "hills" instead. Robust and highly reliable organizations inspire ownership by creating the feelings of safety and this isn't by sprinkling moon dust in the air nor creating corporate slogans and mantras (and yet isn't this what has been going on pre-Macondo), and yet by actions and formalities and formalized processes. This is the trend in SEMS and is applauded and yet the devil is in the details. Ownership is also dependent on the quality and appropriateness of the formalities and the presence of actions and formalities that inspire ownership and a lack of mandated actions and formalities that are capricious, malicious, unfair, and/or arbitrary, that repulse ownership. SEMS measures are not specific to drilling and completions process safety and the only API addressing process safety is not specific to drilling nor completions. The details tell a very different story. There is little room for error between winning hearts and minds and losing them completely. Prudent NGO companies will allocate resources to diligently developing drilling process safety in this way and by demonstrating its success, others will follow and adopt the measures or else the government will mandate this with all of the shortcomings, drawbacks and pitfalls that come with tax payer funded mandates. Do we need any more evidence that the enacted mandates to deepwater drilling have resulted in costs far beyond those that a well funded and thought out allocation to the development of drilling and completions process safety measures that could replace government prescriptions that miss the mark, might cost? Even the government would applaud any effort that would save money and increase safety even if it meant less regulations, less code and less government intervention.