

# Platform Training Requirements and Compliance

# Training Background

- MMS - Training Requirements
  - Well Control & Production Safety Systems (PSS) (1979-2000)
  - MMS driven prescriptive agendas
  - MMS approved curriculum and approved training providers
  - MMS training provider audits
  - Employee competency based on written tests and hands-on workshops

# Training Background

- CSLC Training Requirements
  - Well Control (1980 or earlier)
  - PSS Training (Recommended, but not required)

# MMS - 30 CFR Subpart O-Well Control and Production Safety Training (2002-Present)

- Goals
  - Safe and clean OCS Operations
    - Compliance with regulatory requirements
  - Method of attaining goal
    - Change from prescriptive requirements to Performance Based criteria
    - Operator establishes and implements a training plan designed to achieve training goals

# Training Plan Criteria and Methods

- Procedures for training employees
- Procedures for evaluating contractors training
- Procedures for verifying contractors and employees can perform assigned duties
- Procedures for assessing training needs
- Record and document preservation
- Internal audit procedures

# Training Organization Criteria

- Meet Operator's training plan
- Drilling/Workover (Well Control Schools)
- Accreditation through IADC Well CAP Program
- Production Safety Systems (API RP T-2 Schools)
- Accreditation through API (TPCP)



# Measurement of Training Results (Performance)

- MMS training systems audits
  - Company training programs compliance with stated plans
  - Conducted at both operator and trainers facilities

# Measurement of Training Results (Performance)

- Employee and contract personnel on site interviews
  - What kind of training was provided
  - Operators/Contractors impressions of training effectiveness
  - Where was training conducted



# Measurement of Training Results (Performance)

- Employee and contract personnel testing
  - Written or verbal testing
  - Evaluation of individual knowledge and skills
  - Does employee know how to access available resources?
    - Manufacture literature, platform operations manuals, API Recommended Practices, Guidance from experienced personnel

# Measure of Training Results (Performance)

- Employee and contract personnel testing
  - Hands-on production safety or live well testing
  - Designed to determine practical competency of personnel
  - Test difficulty determined by job classification
  - Inadequate performance could result in an Incident of Non-Compliance (INC) citation
  - Employer could be required to reclassify employee or increase training and additional testing

# West Coast Cooperative Training Plan

- California Offshore Operators Well Control and Production Safety Training Plan (COOP)
- Purpose
  - To provide consistent and standardized set of guidelines for Pacific Operators
  - To join resources and knowledge bases
  - Consistency of methods and results
  - Minimize repetition
  - Forum to discuss common training and safety issues
  - Uniform compliance results with MMS and CSLC

# California Offshore Operators



30 CFR Part 250  
Well Control & Production Safety  
Training Plan

# Participating COOP Organizations

- Aera Energy LLC
- PXP Western Business Unit
- Hurley Environmental, Safety and Management Co.
- Pacific Energy Resources, Ltd.
- Pacific Operators Offshore Inc.
- Pacific SEATEC
- Pool/Nabors Well Services Co.
- Venoco, Inc.
- Westec
- DCOR LLC

# Competency Determination

- MMS and CSLC ongoing detailed facility audits
- MMS - Focused Facility Review
- CSLS - Safety and Oil Spill Prevention Audit

# Focused Facility Review Matrix

	FOCUSED FACILITY REVIEW MATRIX			
POLICIES/PERFORMANCE	DOCUMENTS	ELECTRICAL	FACILITY CONDITION	SAFETY SYSTEMS
Management	MSDS	System Overview	Helideck	Flare Systems
Morale	Manifest	One Lines	Crane	Fire Systems
Cooperation	Pipelines	Area Classification Dw gs	Housekeeping	ESD
SEMP	Work Practices	Distribution/Protection	Deck/Grating	Fire/Smoke/Lighting
Reactive/Proactive	OSRP	Switching/Ground	Stairs/Walkw ays	H2S/Gas
Lease Stipulations	H2S/Gas	Staffing/Training	Piping Support/Brackets	Press/Level/Temp
Development Plan	P&IDs	Outages	Measurement Systems	Lifeboats
MOC	SAFE Charts	Spec Contractors	MOC	Piping/Instrumentation
Contractor Quals/Oversight/Control	Personnel Safety	Work Pol/Pract/Control	Drilling/Workover Rigs	Pressure Vessels
Confined Space Entry	OSE	MOC	BOP Equipment	MOC
Human Factors	Welding/Burning Plans	Redlines/Documentation	Sump Systems	SCBA
Corporate Vision/Values	Welding/Burning Procedures	Elect Safety References	Containment Systems	Cascade
Simultaneous Operations	Lockout/Tagout Procedures	Personal Protective Equip	PP & PV Inspect Plan	BOP Equipment
Orientation/Sign in	Work Permit	Contingencies	PP Ext Inspect Checklist	Lubricator
Communication	Rules and Regulations	Emergency Pow er & Loads	Hazard Identification	Containment Systems
Delegation of Responsibility	Simultaneous Operations	Area Inspections	Containers	Computer Interface
Crew Changeout	Rig Movement	Div 1 & Div 2 Areas	Diesel Fuel Systems	Security
Safety Meetings	Confined Space Entry	Forced Ventilation	Labels/Placards/Signs	Pipelines
Priorities - Safety/Env/Prod	Accident Notification	Purging/Seals/Fire Walls	Security	Sump Systems
Hot Work	EEP	Lighting	Pipelines	
Lockout/Tagout	Crane	High Temperature Devices	Structure	
PP & PV Inspect Plan	PP & PV Inspect Plan	Instrumentation		
PP Ext Inspect Checklist	PP Ext Inspect Checklist	Security		
Chemical Mgmt	Security			
Security	Structure			
<b>TRAINING</b>	<b>ENVIRONMENTAL</b>	Piping & Instrumentation Diagrams (P&IDs)		Oil Spill Response Plan (OSRP)
Training Programs	Drilling	Production Safety System Training (T2)		Emergency Evacuation Plan (EEP)
OSE	Produced Water	Safety Analysis Function Evaluation (SAFE) Charts		Emergency Shutdown (ESD)
H2S	Other Discharges	Safety and Environmental Management Program (SEMP)		Management of Change (MOC)
T1/T2/T3	Painting	Self Contained Breathing Apparatus (SCBA)		Drilling Well-Control Training (T1)
Work Practices	Wildlife	Well-Completion and Well-Workover		Pressure Vessel (PV)
Contractor Quals/Oversight/Control	Wildlife Training	Well-Control Training (T3)		Oil Spill Exercise (OSE)
Personnel Safety	NORM	Material Safety Data Sheets (MSDS)		Process Piping (PP)
EEP	Hazardous Waste Mgmt	Naturally Occurring Radioactive Material (NORM)		Blow Out Prevention (BOP)
Hazardous Materials	Pollution Prevention Sys			FFRMATRIX Update 12/14/06
Crane				
Hazw oper				
Hazcom				
Security				
Pipelines				

# Focused Facility Review Program

- The POCSR initiated and enhanced review program in 1996 - the Focused Facility Review (FFR) Program
- Based on a systematic (focused facility approach)
  - Not device oriented, nor prescriptive - Big Picture perspective
  - Supports the Safety and Environmental Management Program (SEMP) (API RP 75)
  - The systematic criteria for the FFR are contained in the Focused Facility Review Matrix
  - Complements the MMS Partial and Annual inspection program



# Focused Facility Review Program

- Integrated inspection/review team with participation from Operator/MMS District/MMS Regional /MMS Headquarters/USCG/Others (State & County)
  - Engineers, Inspectors, Environmental Scientists forming a team with technical expertise in broad range of offshore operations and safety
  - Promote collaborative inspection/review of Operators Policies/Processes/Procedures and Compliance with P/P/P
  - Encourages continual improvement in offshore safety and environmental protection
  - Emphasizes the critical role of human, organizational, and management influences on safety and environmental protection

# Bottom Line --- Training Effectiveness

Regulation, Training, Compliance Audits  
Measuring Effectiveness

- Employee Performance
- Environmental and Safety Results
- Public and Corporate Goals

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