Platform Training Requirements and Compliance
Training Background

• MMS - Training Requirements
  – 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

Safety, Environmental and Technology Center
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

<table>
<thead>
<tr>
<th>POLICIES/PERFORMANCE</th>
<th>DOCUMENTS</th>
<th>ELECTRICAL</th>
<th>FACILITY CONDITION</th>
<th>SAFETY SYSTEMS</th>
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</thead>
<tbody>
<tr>
<td>Management</td>
<td>MSDS</td>
<td>System Overview</td>
<td>Holdeck</td>
<td>Rare Systems</td>
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<tr>
<td>Morale</td>
<td>Manifest</td>
<td>One Lines</td>
<td>Crane</td>
<td>Fire Systems</td>
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<td>Cooperation</td>
<td>Procedures</td>
<td>Area Classification</td>
<td>Housekeeping</td>
<td>ESD</td>
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<td>SEMP</td>
<td>Work Practices</td>
<td>Distribution/Protection</td>
<td>Deck/Grating</td>
<td>Fire/Smoke/Lighting</td>
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<tr>
<td>Reactive/Proactive</td>
<td>ODRP</td>
<td>Switching/Ground</td>
<td>Stairs/Walkways</td>
<td>H2S/Gas</td>
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<td>Lease Stipulations</td>
<td>H2S/Gas</td>
<td>Staffing/Training</td>
<td>Piping Support/Brackets</td>
<td>Press/Level/Temp</td>
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<td>Development Plan</td>
<td>P&amp;Ps</td>
<td>Outages</td>
<td>Measurement Systems</td>
<td>Lifeboats</td>
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<td>MOC</td>
<td>SAFE Charts</td>
<td>Spec Contractors</td>
<td>MOC</td>
<td>Piping/Instrumentation</td>
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<tr>
<td>Contractor Quals/Oversight/Control</td>
<td>Personnel Safety</td>
<td>Work Permit/Control</td>
<td>Drilling/Workover Rigs</td>
<td>Pressure Vessels</td>
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<tr>
<td>Confined Space Entry</td>
<td>OSE</td>
<td>MOC</td>
<td>BOP Equipment</td>
<td>MOC</td>
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<tr>
<td>Human Factors</td>
<td>Welding/Burning Plans</td>
<td>Redlines/Documentation</td>
<td>Sump Systems</td>
<td>SQIA</td>
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<td>Corporate Vision/Values</td>
<td>Welding/Burning Procedures</td>
<td>Electric Safety References</td>
<td>Container Systems</td>
<td>Cascade</td>
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<tr>
<td>Simultaneous Operations</td>
<td>Lockout/Tagout Procedures</td>
<td>Personal Protective Equip</td>
<td>PP &amp; PV Inspect Plan</td>
<td>BOP Equipment</td>
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<tr>
<td>Orientation/Sign in</td>
<td>Work Permit</td>
<td>Contingencies</td>
<td>PP Ext Inspect Checklist</td>
<td>Lubricator</td>
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<td>Communication</td>
<td>Rules &amp; Regulations</td>
<td>Emergency Power &amp; Loads</td>
<td>Hazard Identification</td>
<td>Container Systems</td>
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<td>Delegation of Responsibility</td>
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<td>Area Inspections</td>
<td>Containers</td>
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<td>Crew Changeout</td>
<td>Rig Movement</td>
<td>Dr. 1 &amp; Dr. 2 Areas</td>
<td>Diesel Fuel Systems</td>
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<td>Safety Meetings</td>
<td>Confined Space Entry</td>
<td>Forced Ventilation</td>
<td>Labels/Tags/Signs</td>
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<td>Priorities - Safety/Env/Prod</td>
<td>Accident Notification</td>
<td>Purging/Seals/Fire Walls</td>
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<td>Hot Work</td>
<td>EEP</td>
<td>Lighting</td>
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<td>Lockout/Tagout</td>
<td>Crane</td>
<td>High Temperature Devices</td>
<td>Structure</td>
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<td>PP &amp; PV Inspect Plan</td>
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<td>Instrumentation</td>
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<td>PP Ext Inspect Checklist</td>
<td>PP Ext Inspect Checklist</td>
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<td>Chemical Mgmt</td>
<td>Security</td>
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<td>TRAINING</td>
<td>ENVIRONMENTAL</td>
<td>Piping &amp; Instrumentation Diagrams (P&amp;ID’s)</td>
<td>Oil Spill Response Plan (OSRP)</td>
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<td>Drilling</td>
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<td>Emergency Evacuation Plan (EEP)</td>
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<td>Safety Analysis Function Evaluation (SAFE) Charts</td>
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<td>Other Discharges</td>
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<td>Management of Change (MOC)</td>
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<td>Pressure Vessel (PV)</td>
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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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