



# **SAFE WORK PRACTICES AND CONTRACTOR SELECTION**

## 1.0 Purpose

This element identifies Petsec's Safe Work Practices and Contractor Selection process as required by its Safety and Environmental Management System (SEMS) Program and applies to all Petsec operations. Petsec is responsible for establishing and implementing safe work practices designed to minimize the risks associated with operation, maintenance and modification activities and the handling of materials and substances that could affect safety and the environment.

## 2.0 Process

Petsec has developed and implemented safe work practices for its facilities according to the standards and requirements of the different agencies governing oil and gas production operations: BOEMRE, OSHA, DOT, USCG and EPA. These practices are designed (considering the human factors) to minimize the risks associated with operating, maintaining and modifying activities and in the handling of materials and substances that could affect health, safety and/or the environment. Petsec separates its employees and contract company personnel into the following groups to support its production, drill/well servicing and construction activities on its facilities.

- Production Operations: Senior Operators, Operators.
- Mechanics: generator, compressor, crane, engine, pump.
- Electricians: lighting, wiring, transformers, motor.
- Technicians: gas detection, fire suppression, air conditioning and heating, alarms, meters, PLC (program logic control).
- Construction: abandonment, modifications, welding, sand blasting, painting.
- Well Control/Well Servicing: drilling, completion, work over, wire line, electric line, coil tubing, well head (valves).

Petsec requires each contract company to have their own written safe work practices as part of their Health, Safety and Environmental Management System. Contractors may adopt appropriate sections of the Petsec SEMS Program through written agreements before the contractor begins work at Petsec facilities; see **Attachment A, *Written Agreement***. Safe work practices for contractors already working for Petsec are verified using the process described in the Safe Work Practices section of this element.

<b>NOTE</b>	<b>A contractor is anyone performing oil and gas-related work on a Petsec facility, but does not apply to domestic services such as janitorial work, food and domestic services, laundry services, housekeeping and similar activities.</b>
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When selecting contractors, Petsec obtains and evaluates information regarding the contractor's health, safety and environmental performance. Petsec requires its contractors to have their own written safe work practices as part of their Health, Safety and Environmental Management System.

Contractors may adopt appropriate sections of the Petsec SEMS Program through written agreements **before** the contractor begins work at PETSEC facilities. Petsec referred to API RP 76, Contractor Safety Management for Oil and Gas Drilling and Production Operations when developing these procedures. Safe work practices for contractors already working for Petsec are verified using the process described in the *Selecting a Contractor* section of this element.

- 2.1 Petsec documents that its contract employees are knowledgeable and experienced in the work practices necessary to perform their jobs in a safe and environmentally sound manner.

<b>NOTE</b>	<b>Documentation of each contract employee's expertise to perform his/her job and a copy of the contractor's safety policies and procedures are available to Petsec and the BOEMRE.</b>
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- 2.2 The SEMS Program includes procedures and verification for selecting a contractor:

2.2.1 Procedures that verify contractors are conducting their activities in accordance with the Petsec SEMS Program.

2.2.2 Assuring contractors have the skills and knowledge to perform their assigned duties and are conducting these activities in accordance with the requirements in the Petsec SEMS Program.

<b>NOTE</b>	<b>The procedures and verifications associated with Contractor Selection and safe work practices are available for inspection upon request.</b>
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- 2.3 The SEMS Program includes procedures and verification contractor personnel understand and can perform their assigned duties for activities such as, but not limited to the

- Installation, maintenance and repair of equipment.
- Construction, startup and operation of the facility.
- Major renovations.
- Specialty work.

<b>NOTE</b>	<b>Turnaround operations are not applicable to the SEMS Program.</b>
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- 2.4 Petsec performs periodic evaluations of the performance of contract employees that verifies they are fulfilling their obligations.

- 2.5 Petsec maintains a contract employee injury and illness log for six (6) years related to contractor work in the operations area; this information is posted on Form MMS-131 and submitted to BOEMRE annually (by March 31 of the subsequent year), separated into calendar quarters.

- 2.6 Petsec informs its contractors of any known hazards at the facility they are working on, including but not limited to fires, explosions, slips/trips/falls, other injuries and hazards associated with lifting operations.
- 2.7 Petsec has developed and implemented safe work practices to control the presence, entrance and exit of contract employees in operation areas.

**3.0 Selecting a Contractor**

Petsec communicates its health, safety and environmental expectations to contractors so the contractor and its employees will know their obligations before the start of work. Petsec evaluates its contractors during initial audits prior to selection, its employees while working on Petsec facilities and the company after the project or work is done.

- 3.1 Petsec (or its designee) audits the perspective contract company to verify it has the following:
  - Written safety and environmental policies and procedures endorsed by the contractor’s top management.
  - Recordable injury and illness experience data for the last three years, with a TRIR of less than 2.0.
  - A description or a copy of the contract company’s health and safety programs, including a written Subpart “O” Training Plan.
  - A copy of the contract company’s training report, showing training of the safe work practices that put the contractor into compliance with regulatory training requirements.
  - Evidence that contract employees selected to work on PETSEC facilities are knowledgeable and experienced in the work practices necessary to perform their jobs.

<b>NOTE</b>	<b>Petsec conducts in-depth audits for those contractors performing work with the greatest exposures.</b>
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- 3.2 If the criteria is met and the audit is successful, Petsec sends a Master Service Agreement (MSA) to the contract company for review and approval; the contract company sends the signed MSA back to Petsec with Certificates of Insurance (COI) for the coverage amounts identified, and the contract company is added to the contractor-approved list.

<b>NOTE</b>	<b>This applies to contractors actually sending personnel to perform work on PETSEC facilities.</b>
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- 3.3 Production Superintendent (or designee) sends a *Written Agreement* to the newly-approved contractor. The Agreement identifies which Petsec safe work practices it wants the contractor’s employees to use when working on Petsec facilities, which safe work practices it must provide evidence of training and copies of the SEMS Program elements it wants the contractor to train its contract employees.

- 3.4 Contract company returns the signed Agreement to the respective Legal Counsel for review and approval before work begins.
- 3.5 Once approved, the Production Superintendent communicates with the contract company to send its personnel to the selected Petsec facility.

<b>NOTE</b>	<b>If this is a Management Of Change issue (change in personnel, the Facility PIC initiates the MOC process and obtains approval before proceeding.</b>
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- 3.6 Prior to arrival on the facility, all personnel (newly-hired or transferred employees and contract personnel) receive safety briefings from either the helicopter pilot or boat captain at the shore bases on the proper procedures for boarding and disembarking, handling materials, donning proper PPE, smoking safety and traveling on boats or helicopters. The pilot and boat captain monitor behavior while traveling and take corrective action if anyone acts inappropriately.
- 3.7 Once the employee or contract person arrives on the facility, the Facility PIC (or designee) gives an orientation and documents and/or verifies his/her experience, expertise and knowledge; refer to the *Orientations* procedure.
- 3.7.1 The person receiving the orientation checks off discussion items once they are understood and signs at the bottom of the form, indicating an understanding of the information covered. The documentation of information on this orientation includes:
- Location of ESD stations, general alarms, fire fighting and safety equipment; alarms are sounded during orientations.
  - PPE requirements (usage and maintenance).
  - Known hazards in the operating areas, including working and walking surfaces (slips, trips and falls), potential fire and ignition locations, lifting hazards and chemical hazards (and the location of the MSDS binder).
  - Reporting of incidents to Petsec personnel immediately.
  - Marine Trash and Debris requirements.
  - Smoking policy on the facility (designated smoking areas).
  - Housekeeping and personal hygiene information.
  - Cell phone and other electronic device usage.
  - Drug and alcohol policy (including prescription drugs).
  - Production Safety System device by-pass policy.
  - Any unusual or specific platform activities.
  - A review of safety rules that address existing activities.
  - A review of the applicable SEMS Program elements.

- 3.7.2 The review of the safety rules includes information about the safe work practices that control the entrance and exit of, as well as their safety in, operation areas. These safe work practices include the JSEA, observation cards, hazard communication, PPE, stop work authority, hearing protection and others specific to the current work activity.
- 3.7.3 The employee or contract person documents his/her experience, expertise and knowledge using the **Knowledge and Skills Worksheet** form; see **Attachment B**.
- 3.7.4 Facility PIC (or designee) may verify the information documented on the Worksheet: make observations, ask the contract person to demonstrate a task and answer questions related to a procedure, process or practice and/or ask the contract company to provide supporting information.
- 3.7.5 Facility PIC attaches this *Worksheet* and copies of cards and/or certificates to the *Orientation* form and places it in the appropriate SEMS file at the facility within 30 days.
- 3.8 If the contract person works a shift (7 or 14 days on; 7 or 14 days off) for one (1) year, the Facility PIC evaluates him/her by making observations, giving a written or verbal Subpart "O" test and/or asking him/her to demonstrate a task and documenting the results on a *Worksheet*.
- 3.9 Petsec reviews production operations contractor performances after the completion of all projects to determine if obligations were met by evaluating various items and issues every three (3) years. The results are documented on a report by the Facility PIC and sent to the Petsec office.

<b>NOTE</b>	<b>Results of reviews, assessments and/or incident investigations are included in determining future risk of each contractor.</b>
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- 3.10 If Production Superintendent is not satisfied with the contract company's performance, he contacts the Petsec Lafayette office and the contractor is removed from the contractor-approved list; the contractor is no longer allowed to work on Petsec facilities.

### 3.11 **Safe Conduct of Work Activities**

Petsec safe work practices for all personnel, including contractors, provide for the safe conduct of operation, maintenance and modification activities. These policies and procedures are found in the Petsec Health, Safety and Environmental Management System manual. Safe work practices require work authorization or permit-to-work implementation for tasks involving the following, depending on the work activity being performed:

- Confined Space Entry (29 CFR 1910.146)
- Crane Operations (API RP 2D)
- Electrical Safety-Related Practices (29 CFR 1910.301-309)

- Fall Protection (29 CFR 1910.66; 29 CFR 1926.500)
- Fire Extinguisher and Fire Safety (29 CFR 1910.157)
- Hazard Communication (29 CFR 1910.1200)
- HAZWOPER (Level 1) (29 CFR 1910.120)
- Hearing Conservation (29 CFR 1910.95)
- Hot Work (API RP 75, Section 6.2)
- Lockout/Tagout (Hazardous Energy) (29 CFR 1910.147)
- Management Of Change (MOC) (30 CFR 2540.1912)
- Permit To Work (API RP 75)
- Personal Protective Equipment (PPE) (29 CFR 1910.132)
- Respiratory Protection (29 CFR 1910.134)
- Simultaneous Operations (30 CFR 250.490)
- Stop Work Authority (30 CFR 250.1911)
- Opening of pressurized or energized equipment or piping.
- Job Safety and Environmental Analysis (30 CFR 250.1911)
- Well Control and Production Safety Training (Subpart "O") (30 CFR 250.1500)

<b>NOTE</b>	<b>When Petsec production operations personnel deviate from these prescribed methodologies, an MOC is generated and approved prior to the start of work.</b>
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- 3.12 The work authorization or permit-to-work system for employees and contract personnel provides for adequate communication of work activities to shift change and replacement personnel through JSEA and other procedures.
- 3.13 The handling of toxic or hazardous materials that can affect safety and environmental protection are determined, documented and communicated to appropriate personnel using the *Hazard Communication* procedure.
- 3.14 Material specifications, inventories, separation and confinement are determined, documented and communicated in the specific procedure related to the material.
- 3.15 Petsec employees and contract personnel working on Petsec-owned facilities are trained on these procedures and SEMS Program elements.

#### **4.0 Training**

- 4.1 Train all Petsec production operations' employees and contract personnel every five (5) years on the contents of this element; refer to the Training element.
- 4.2 Train all newly-hired production operations' employees and contract personnel within 30 days of arrival at the facility on the contents of this element; refer to the Training element.
- 4.3 Train all production operations' employees and contract personnel in the safe work practices listed in this element; refer to the Training element.

- 4.4 Verify training of the safe work practices identified in this element with the contract companies prior to the start of work activities.
- 4.5 Train or inform affected employees of any changes to this element within 30 days after the element changes have been approved and completed.

## **5.0 Recordkeeping**

- 5.1 *Written Agreements* are placed in the Petsec SEMS file within 30 days after receipt.
- 5.2 *Knowledge and Skills Documentation Worksheets* are placed in the SEMS files within 30 days after completion.
- 5.3 Facility Orientation forms are placed in the SEMS files within 30 days after completion.
- 5.4 Copies of the MMS-131 are sent to BOEMRE annually (by March 31), separated into quarters, then placed in the SEMS files within 30 days after completion.
- 5.5 Copies of contractor reviews are placed in the SEMS files within 30 days after the operation or work is completed.
- 5.6 Copies of all Written Agreements, reviews, forms and reports are retained for six (6) years, and placed in the SEMS files within 30 days after receipt.

## **6.0 Attachments**

- 6.1 Attachment A: *PETSEC SEMS Written Agreement*
- 6.2 Attachment B: *Job Evaluation* form



## **Attachment A**

### **Written Agreement**

**Google International Association of Drilling Contractors**

**Click HSE on Home Page**

**When TOOLBOX appears, click IADC symbol on right**

**When Tool Box appears, scroll down to**

- **Operator/Contractor Agreement Letters: 3 templates**
- **Others ???**

## **Attachment B**

### **Knowledge and Skills Worksheet**

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**When Tool Box appears, scroll down to**

- **Knowledge and Skills Documentation Worksheet**
- **Others ???**