



TRAINING

1.0 Purpose

This element identifies Petsec's Training Plan for its Safety and Environmental Management System (SEMS) Program; it applies to all Petsec operations. Petsec has established and implemented this Training program to ensure all personnel are trained to work safely and are aware of safety and environmental considerations, in accordance with their duties and responsibilities.

2.0 Process

This training program addresses the elements of the SEMS Program, with emphasis on Operating Procedures (.1913), Safe Work Practices (.1914) and Emergency Response and Control (.1918) and the additional training requirements identified in Subpart S and API RP 75.

- 2.1 Instructors (in-house) are selected from the existing work force and have most if not all of the qualifications listed below:
 - Experience in health, safety and environmental compliance.
 - Skills, knowledge and experience as a production operator.
 - Skills, knowledge and experience in equipment and systems operation and maintenance.
 - Knowledge and experience with process safety system devices.
 - Knowledge and experience with oil and gas production processes.
 - Skills and experience in hazards analyses.
 - Knowledge and experience with job safety and environmental analyses.
- 2.2 Training requirements for each job classification and the frequency for refresher training of these requirements are found in the ***Training Matrix***; refer to **Attachment A**, which is prepared and reviewed by the Production Superintendent annually.
- 2.3 Initial training is conducted for the basic well-being of personnel and the protection of the environment; it is provided to new employees within the first six (6) months of employment:
 - Orientation (API RP T-1).
 - Rescue of Persons in Water (API RP T-7).
 - Confined Space Entry (29 CFR 1910.146).
 - Lockout/Tagout (29 CFR 1910.147).
 - Simultaneous Operations (30 CFR 250.490).
 - Hazards Communication (29 CFR 1910.1200).
 - Permit To Work (API RP 75)
 - Personal Protective Equipment (PPE) (29 CFR 1910.132)
 - Stop Work Authority (Best Practice)
 - Job Safety and Environmental Analysis (JSEA) (30 CFR 250.1911)
 - Marine Trash and Debris

- 2.4 Training is conducted to ensure personnel assigned to operate and maintain the facilities possess the knowledge and skills to carry out their duties and responsibilities. This training includes the following:
- Safety and Anti-Pollution Device Training (API RP T-2).
 - Crane operation and maintenance (API RP 2D).
 - Emergency Evacuation Plan (33 CFR.146.140)
 - Hurricane Evacuation Plan (Best Practice).
 - Oil Spill Contingency Plan (30 CFR 254.6).
 - Simultaneous Operations (30 CFR 250.490).
 - Operating and maintenance training specific to their job position; refer to *Operating Procedures* element.
- 2.5 Each job classification is trained on specific SEMS Program elements, depending on the duties and responsibilities of the employees or contract personnel.
- 2.6 Additional training is conducted to complete the requirements to be in compliance with the federal government:
- Fire Fighting (API RP 14G).
 - Hot Work (API RP 75).
 - Respiratory Protection (29 CFR 1910.134).
 - Fall Protection (29 CFR 1910.66; 29 CFR 1926.500).
 - Electrical Safety-Related Practices (29 CFR 1910.301-309)
 - Hearing Conversation (29 CFR 1910.95)
- 2.7 All training is documented on the ***Training Report***; see **Attachment B**.
- 2.8 Periodic (refresher) training is conducted to maintain an understanding of and adherence to current operating procedures and to verify adequate retention of the required knowledge and skills by the operators and maintenance personnel.
- 2.9 Operating procedure drills are conducted to determine whether or not the operators are competent in their roles and responsibilities associated with production operations. The Facility PIC utilizes the *Knowledge and Skill Worksheet* to conduct the drill.
- 2.10 Whenever a change is made to operating procedures, safe work practices, emergency response and control procedures, all affected personnel are either re-trained on the procedure or informed of the change before they are expected to operate or maintain the facility. The choice between re-training and communicating the changes depends on the degree of change within the procedure; that decision is made by the Production Superintendent.

- 2.11 The Production Superintendent monitor the training of the personnel they supervise to ensure their training is up-to-date according to the regulations and Petsec policy. Prior to the expiration of training, the Superintendent (or designee) schedules training to ensure compliance. This applies to all training requirements; refer to Attachment B.
- 2.12 Contractors are required to train their personnel according to the federal regulatory requirements and the SEMS Program. The training is verified through bridging documents to identify the requirements and evidence provided by the contractor to show training for individuals working on Petsec facilities has been conducted.
- 2.12.1 Training on Petsec safe work practices and SEMS Program elements that Petsec requires contract personnel to use when working on its facilities are provided to the contractor and the contractor is expected to train its personnel and provide evidence that the training is conducted.
- 2.12.2 The contractor is expected to train its personnel on the remaining required safe work practices and provide evidence that the training is conducted and is current.
- 2.12.3 Refer to the *Training Matrix* (Attachment A) to determine these training requirements.
- 2.12.4 Petsec verifies contractor training through audits of the contractor's health, safety and environmental management system and through observations of contractor work performance at the Petsec facilities.

2.13 Procedure

Petsec has established a Training Plan as part of its *Health, Safety and Environmental Management System*. Training begins by carefully assessing each job position within Petsec to determine which personnel need specific training, and how often, then conducting the training; the process ends with an employee evaluation to assure the training is effective. Employees (new and existing) are trained in the various plans, programs, policies and procedures which make up the Petsec HSE Management System.

- 2.13.1 Qualification criteria for selecting facility operating and maintenance personnel exists for the operation classifications:
- Knowledge and skill in the operating procedures.
 - Training in the regulator requirements.
 - Experience working in production operations.
 - Positive attitude towards safety and environmental issues.

2.13.2 The Facility PIC evaluates the operators by observing them operate and maintain the equipment and components and comparing their performance to the current written operating procedures, including startup and shutdown.

NOTE	H2S is not present on any Petsec offshore facility.
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2.13.3 **Initial training** for the basic well-being of personnel and the protection of the environment includes all of the safe work practices and SEMS Program elements. The training is recorded on the SEMS **Training Report**; refer to example in Attachment B.

2.13.3.1 Petsec production operations employees are trained in the SEMS Program (elements, API Recommended Practices and other government-required regulations and standards), and their training is documented on the Petsec Training Report.

2.13.3.2 Production operations employees receive site-specific skills and knowledge training related to their job duties and responsibilities shortly after they arrive at their assigned Petsec facility.

2.13.3.3 Petsec production operations contract personnel also receive site specific training on some of the Petsec SEMS Program elements.

2.13.3.4 Contractors providing incidental services receive training in transportation safety at the shore bases, emergency evacuation awareness training during their orientation and site-specific training as it applies to their craft and the work they perform on the Petsec facility.

2.13.3.5 Production operations contract personnel receive skills and knowledge training related to their job duties and responsibilities from their respective contract company, and continue their site-specific skills and knowledge training shortly after they arrive at their assigned Petsec facility.

2.13.3.6 All other contract personnel receive skills and knowledge training relative to their craft from their respective contract companies, including training in applicable safe work practices.

2.13.3.7 The Production Superintendent reviews the Petsec Training Report and the contract provider's training information quarterly to ensure all production operations employees and contract personnel working in his area are in compliance with SEMS and all other government regulatory training requirements.

NOTE	A current POB is used to identify employees and contract personnel working on a particular Petsec facility.
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2.13.3.8 When changes are made to operating procedures or safe work practices, personnel are trained in or otherwise informed of the change before they are expected to operate the facility.

2.13.4 **Periodic (refresher) training** for employees and contract personnel is conducted to maintain an understanding of, and adherence to, the current operating procedures prior to expiration.

2.13.5 **Training is verified** by the Facility PIC who makes observations, administers tests (provided by the Operations Technician / Regulatory and/or has the employee or contract person demonstrate a task to determine if the contract person is trained in safe work practices, the skills and knowledge related to his/her job position or title and/or to verify retention of recent training. Refer to *Safe Work Practices* element, if applicable.

2.13.6 **Re-training** occurs as part of the corrective action process if the evaluation reveals that the employee or contract person (or subcontract person on the well servicing or construction crew) does not understand specific safe work practices or is not able to perform their duties and responsibilities at the proper skill and knowledge levels associated with their craft.

2.13.7 If there are deficiencies in the evaluation, the Facility PIC reports the evaluation results (and recommendations) to the Production Superintendent for action.

2.13.8 The Production Superintendent has the final authority whether or not an employee or contract (subcontract) person is allowed to continue to work if the evaluation reveals a lack of understanding or an inability to demonstrate knowledge and skills regarding their duties and responsibilities.

2.14 When SEMS elements are edited due to changes in the regulations or in operating procedures, training materials are similarly changed to reflect those edits.

2.15 During incident investigations, if training is determined to be part of the root cause, the training and/or testing materials are evaluated for effectiveness and, if necessary, changed in order to be effective.

3.0 Training

3.1 Train all affected employees every five (5) years on the contents of this element.

3.2 Train all affected, newly-hired employees within 30 days of their hire date on the contents of this element.

3.3 Train or inform affected employees of any changes to this element within 30 days after the element changes have been approved and completed.

4.0 Recordkeeping

4.1 Copies of the Training Matrix are placed in the SEMS files by the Operations Technician / Regulatory within 30 days after change.

4.2 Copies of the Training Report are placed in the SEMS files by the Operations Technician / Regulatory within 30 days after updated.

5.0 Attachments

5.1 Attachment A: Training Matrix (Example)

5.2 Attachment B: Training Report (Example)

Attachment A

SEMS TRAINING MATRIX
EXAMPLE

WORK AREAS	1 Leadership and Commitment	2 Safety & Environ Information	3 Hazards Analysis	4 Management of Change	5 Operating Procedures	6 Safe Work Practices Contractor Selection	7 Training	8 Mechanical Integrity	9 Pre-Startup Review	10 Emergency Response and Control	11 Investigation of Incidents	12 Audits	13 Records and Documentation	Emergency Evacuation Plan	Hurricane Evacuation Plan	Oil Spill Response Plan	Simultaneous Operations	Well Control/ Well Servicing	Production Safety Systems (T-2)	Subpart "O"		
Production Ops. – Employees (Operators, etc.)	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X			
Production Ops. – Contract Personnel (Operators, etc.)	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
Mechanics (Generator, Crane, Compressor, Motor, Pump, etc.)				X		X		X	X	X	X			X	X						X	
Technicians (Alarms, Gas Detection, Fire Suppression, Meters, AC&H, etc.)				X		X		X	X	X	X			X	X						X	
Electricians (Lighting, Wiring, Appliances, Transformers, Motors, etc.)				X		X		X	X	X	X			X	X						X	
Construction (Welding, Assembly, Sand Blasting, Painting, etc.)				X		X			X	X	X			X	X		X				X	
Well Control and Well Servicing				X		X				X	X			X	X	X	X	X			X	

Attachment B

SEMS TRAINING REPORT

EXAMPLE

WORK AREAS	1 Leadership and Commitment	2 Safety & Environ Information	3 Hazards Analysis	4 Management of Change	5 Operating Procedures	6 Safe Work Practices Contractor Selection	7 Training	8 Mechanical Integrity	9 Pre-Startup Review	10 Emergency Response and Control	11 Investigation of Incidents	12 Audits	13 Records and Documentation	Emergency Evacuation Plan	Hurricane Evacuation Plan	Oil Spill Response Plan	Simultaneous Operations	Well Control/ Well Servicing	Production Safety Systems (T-2)	Subpart "O"				
Names of Production Operations Employees																								
Names of Production Operations Contract Personnel																								

Note: Shaded area indicates SEMS Elements (13).