

EMERGENCY RESPONSE AND CONTROL

1.0 Purpose

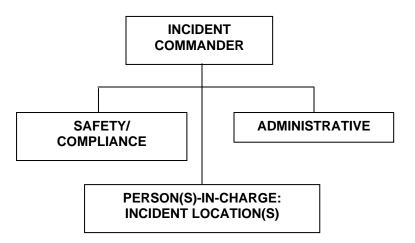
This element identifies the criteria for the Petsec's Emergency Response and Control Plans to comply with its Safety and Environmental Management System (SEMS) Program; it applies to all Petsec operations. The Emergency Response Plans include the Emergency Evacuation Plan, the Hurricane Evacuation Plan and the Oil Spill Response Plan; copies of these Plans are found on each manned facility. These Plans and this element are reviewed annually to assure compliance with regulatory requirements.

2.0 Process

Management participates in developing and implementing the emergency preparedness and response plans and procedures, including training, drills and exercises. Management also provides the resources to adequately address and manage preparedness activities during the implementation of the field procedure.

2.1 Emergency Preparedness and Response Organization

Petsec has a functioning Incident Command System (ICS) for facilitating emergencies utilizing a tiered response concept that assures personnel assigned to positions within the ICS are trained and understand their roles and responsibilities.



2.2 Each "emergency" has a corresponding preparedness and evacuation and/or response Plan; take time to review each of them.

Emergency Response Plan in compliance with 33 CFR 1946.

- Uncontrolled Fire: fire grows beyond suppression (beyond incipient stage).
- Uncontrolled Well: well flow situation deteriorates beyond suppression.
- Ship Collision: ship is about to collide or collides with facility.

Oil Spill Response Plan in compliance with 30 CFR 250.

• Spill and Releases: according to MMS guidelines.

Hurricane and Emergency Evacuation Plans.

• Approaching Hurricane: hurricane becomes a potential threat to facility.

2.3 Field Procedure

Petsec assures the protection of its people, the environment and its property from a wide range of potential risks and hazards by having up-todate emergency response plans, resources and capabilities in place and available to address the full range of incidents, emergencies and crises that may occur. In its Emergency Response Plans, Qualified Individuals (QI) are identified and are available on a 24-hour basis. The QI is able and qualified to perform the following duties:

- Activate and engage in contracting with emergency response organizations or other response resources.
- Mobilize all necessary resources and equipment needed to respond to any emergency.
- Act as liaison with the Federal/State on-scene coordinator(s).
- Obligate funds required to affect response activities.

NOTERefer to specific Plan to determine response methodology, equipment
and equipment access requirements, inspection and maintenance
requirements and responses to hazardous substances.

Generally, the Facility PIC and his designees follow the applicable emergency response plan but at a minimum accomplish the following when an emergency event occurs:

- 2.3.1 Evaluate the threat to personnel and/or the extent of the damage.
- 2.3.2 Notify affected personnel in immediate area and/or sound an alarm.
- 2.3.3 Control the hazard (if possible):
 - Stop the spill, release or well control incident.
 - Extinguish the fire.
 - Isolate the hazardous material or damaged area.
- 2.3.4 Take steps to protect personnel, the environment and damage to company property or nearby facilities.
 - Shut off ignition sources.
 - Restrict access.
 - Prepare for the hurricane.
 - Attend to the injured.
 - Initiate rescue and response actions.
 - Evacuate personnel (phased or immediate).

2.3.5 Notify company personnel.

Facility PIC assures response personnel have the skills, knowledge and understanding to work safely during an actual emergency or response exercise or drill through training. Facility PIC and operators have the training and knowledge to apply this procedure to the work performed in their areas of responsibility through training. Contractor management is responsible for providing Petsec supervision with documentation of contractor personnel training before work begins.

2.4 **Communications**

Petsec communicates information to those with responsibility for emergency response management. For spills, releases and well control incidents refer to the Petsec *Oil Spill Response Plan*. For evacuations, refer to the *Emergency Evacuation Plan*. Preparations for emergencies are communicated to affected employees via tabletop and drill exercises and training. In addition, paper or electronic copies of the response plans and procedures are readily available to responsible personnel. The performances of these responsible personnel to manage the identified emergency are evaluated after each emergency.

2.5 **Emergency Evacuation Drills**

Drills based on real-world scenarios are conducted annually to exercise all aspects of the facility's Plans and to address the readiness of personnel and their interaction with equipment; these drills validate the Emergency Response Plans.

The Emergency Evacuation Plan assigns the authority and responsibility to the Facility PIC at each manned facility for initiating effective emergency response and control, addressing emergency reporting and response requirements and complying with all applicable government regulations. Both crews must conduct drills for the Emergency Evacuation Plan annually and within the first six (6) months after a new facility is installed or acquired.

- 2.6.1 Production Superintendent gives a written, real-world emergency scenario to someone on the facility; it must contain enough information for personnel to successfully implement the Emergency Evacuation drill. See Attachment A: *Emergency Evacuation Scenarios*.
- 2.6.2 Lead Operator becomes an observer; he documents his observations but does not interfere with the evacuation process. The Production Operator may ask questions of the PIC and other personnel to determine if they are familiar with their duties and responsibilities contained in the Plan. See Attachment B: *Emergency Evacuation Drill Checklist*.
- 2.6.3 If person receiving the emergency scenario is not the Facility PIC, he/she gives the scenario to the Facility PIC immediately.
- 2.6.4 Facility PIC evaluates the threat to personnel and/or the extent of the damage to the environment and/or the facility; this information is contained in the scenario. The Facility PIC then

- 2.6.4.1 Takes steps to control the emergency (if possible): hit the ESD, shut in the well, put out the fire, close a valve, etc.
- 2.6.4.2 If the situation is out of control, proceeds with evacuation according to the *Emergency Evacuation Plan*.
- 2.6.4.3 If evacuation is eminent, the Facility PIC identifies what calls are made prior to evacuating.
- 2.6.4.4 If the scenario presents circumstances that cannot be acted out, he/she verbally explains what should happen:
 - Steps to launch the survival craft.
 - How to rescue a person in the water.
 - Ways to transfer individuals from the facility to the supply boat or survival craft and vice-versa.
 - Where the nearest safe harbor is for this facility.
- 2.6.5 Once the drill is complete, all facility personnel meet to discuss the observations and critique the process to determine if there are any weaknesses.
- 2.6.6 The Lead Operator completes a Safety Meeting Report documenting the drill and attaches the Checklist and Scenario to it.

2.7 Hurricane Evacuation Drills

The Hurricane Evacuation Plan assigns the authority and responsibility to the Facility PIC at each facility and his Production Operator for initiating effective emergency response and control, addressing emergency reporting and response requirements and complying with all applicable government regulations.

Both crews must conduct drills on the Hurricane Evacuation Plan by June of each year to prepare for hurricanes that are likely to enter the Gulf of Mexico sometime during the hurricane season (June 1 through November 30).

NOTE If personnel have actually evacuated for a hurricane within the current year, a drill does not have to be conducted. This does not apply to personnel working on the opposite shift. Find verification paperwork from the last evacuation and generate a Safety Meeting Report; attach the paperwork to the Report and place it in the appropriate file.

2.7.1 Production Superintendent gives a written, real-world hurricane scenario to the Facility PIC; it must contain enough information for the PIC to successfully implement the Hurricane Evacuation drill. See **Attachment C:** *Hurricane Scenarios*.

- 2.7.2 Lead Operator becomes an observer; he documents his observations but does not interfere with the process. The Production Operator may ask questions of the PIC and other personnel to determine if they are familiar with their duties and responsibilities contained in the Plan. See Attachment D: *Hurricane Evacuation Checklist*.
- 2.7.3 Facility PIC proceeds with the Hurricane Evacuation Plan. If the scenario presents situations and/or circumstances that cannot be acted out, the Facility PIC verbally explains what should happen:
 - What is involved in the preparation phases (1 through 3)?
 - When do the evacuation phases (1 through 3) change?
 - What group of personnel is evacuated in each phase?
- 2.7.4 Once the drill is complete, all facility personnel meet (conference call) to discuss the observations and critique the process.
- 2.7.5 The Lead Operator completes a Safety Meeting Report documenting the drill and attaches the Checklist and Scenario to it.

2.8 Oil Spill Response Drills

The Oil Spill Response Plan assigns the authority and responsibility to the Facility PIC for initiating effective emergency response and control, addressing emergency reporting and response requirements and complying with all applicable government regulations. The Oil Spill Response drill consists of an annual internal exercise; it is intended to exercise and test the communications between personnel on each facility and a qualified individual (QI) on shore.

- 2.8.1 Facility PIC:
 - 2.8.1.1 thinks of a critical spill scenario; the scenario can be a break in a pipeline, overflow from a vessel, etc.
 - 2.8.1.2 completes the *Spill Report Form* in the Plan based on the spill scenario and checks the box marked **Drill** at the top of the *Form*.
 - 2.8.1.3 calls and/or contacts the QI beginning with the following statement: This is a drill!!!
 - 2.8.1.4 describes the spill scenario to the QI, then sends an electronic copy of the Report to the QI (fax or eMail).
- 2.8.2 The QI calls/contacts the Facility PIC and acknowledges receipt of the Report.

2.8.3 The Facility PIC

- 2.8.3.1 completes the *PREP Internal Exercise Documentation Form* and the *Conversation/Action Record* found in the **Oil Spill Response Plan** based on the scenario and the conversation with the QI.
- 2.8.3.2 attaches forms to Spill Report and places all of the paperwork in the appropriate HSE file.
- 2.8.4 If necessary, QI and Facility PIC analyze and critique the drill/paperwork (via conference call) to determine if there are any weaknesses.

4.0 Training

- 4.1 Train all Petsec production operations employees and contract personnel every five (5) years on the contents of this element and the Emergency Response Plans.
 - Emergency Evacuation Plan.
 - Hurricane Evacuation Plan.
 - Oil Spill Response Plan.
 - Simultaneous Operations Plan.
 - Subpart "O" Training Plan.
- 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 and the Emergency Response Plans.
- 4.3 Other contract personnel are made aware of the Emergency Response and Control Plans during their orientation.
- 4.4 Production operations personnel must also be trained in the following:
 - Life saving (first aid).
 - Water survival (and rescue).
 - Survival craft operation, if applicable.
- 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 The Emergency Evacuation Drill Checklist, Scenario and Safety Meeting Report are placed in the SEMS files within 30 days of the drill and are maintained for six (6) years.
- 5.2 The Hurricane Evacuation Drill Checklist, Scenario and Safety Meeting Report are placed in the SEMS files 30 days of the drill and are maintained for six (6) years.

5.3 The Oil Spill Report, Internal Exercise Documentation Form and Annual QI Notification Exercise form are placed in the SEMS files within 30 days of the Oil Spill Response drill and are maintained for six (6) years.

6.0 Attachments

- 6.1 Attachment A: Emergency Scenarios
- 6.2 Attachment B: Emergency Evacuation Plan Checklist
- 6.3 Attachment C: Hurricane Scenarios
- 6.4 Attachment D: Hurricane Evacuation Plan Checklist

Attachment A

Emergency Evacuation Scenarios

Example

Facility (print): MI 242	Facility PIC (print): Joe Smith	Crew: A		
Emergency Situation/Conditions: An empty sea-going oil tanker has lost steering and power				
and is floating with the current directly towards your facility. The ship is northeast less				
than one-half (1/2) mile away. No	one from the ship has contacted you.			
Helicopter Status: Helicopter is at Field Boat Status: Field boat is tied to the WD 328C				
the Venice heliport. platform.				
Real-world conditions:				
 Personnel available: whoever you have on board at the time the drill begins. Weather: wind and sea conditions are actual (whatever you are experiencing). Resources: only equipment you have on this platform is part of this drill. Other: Other: 				
Comments:				

BLANK

Facility (print):	Facility PIC (print):	Crew:
Emergency Situation/Condition	is:	
Helicopter Status:	Field Boat Statu	JS:
 Weather: wind and Resources: only ec Other: Other: 	e: whoever you have on board at sea conditions are actual (whate quipment you have on this platfor	ever you are experiencing).
Comments:		

Attachment B

Emergency Evacuation Checklist

Facility:	Facility PIC (print):	Cre	w:	
Observer (print):	Observer Signature:	Date:		
Observation Item			No	NA
Has a written, real-world scenario been pr				
Was scenario given to someone other that				
If yes, was scenario given to Faci				
Did Facility PIC evaluate the threat to pers	sonnel? Describe in detail:			
Did Facility PIC evaluate the extent to facility? Describe in detail:	damage to the environment and/or the			
Did Facility PIC determine the situation c control situation:	ould be controlled? Describe actions to			
Did Facility PIC determine the situation was out of control? Explain why the situation could not be controlled:				
Did Facility PIC decide personnel had to b	e evacuated?			
Were non-essential personnel evacuated				
Does this scenario require broadcasting a	distress call?			
Was call made on Channel 16?				
Did Facility PIC account for all personnel?	Explain how:			
Did Facility PIC select correct manner for Describe in detail.	or how personnel would be evacuated?			
Was anyone able to explain steps to (refe				
 rescue a person in the water? Given the second secon				
 transfer individuals to the supply be 				
Was anyone able to identify the nearest so Identify their choice for safe harbor.	afe harbor? Give name.			
Was Incident Report generated?				
Were any agencies notified? Identify which	ch ones:			
Was safety meeting held after the drill to o drill process?	discuss the observations and critique the			
Was safety meeting report completed cov				
Were safety meeting report, drill scenari Facility PIC for placed in the SEMS files?	o and completed checklist given to the			
Comments:				

Attachment C

Hurricane Evacuation Scenarios

Examples

Facility (print): MI 242	Facility PIC (pri	nt): Joe Smith	Crew: A
Emergency Situation/Conditions: A tropical storm named Big Bertha developed in the Gulf			
350 miles due east of the facility one hour ago. The hurricane center predicts it will			
travel west at 10 MPH and become	e a hurricane i	n the next 2 hours.	
Helicopter Status: Helicopter is at the Galveston Field Boat Status: Field boat is tied to the			
heliport.		GA 328C platform.	
Real-world conditions:			
 Personnel available: whoever you have on board at the time the drill begins. Weather: wind and sea conditions are actual (whatever you are experiencing). 			
 Resources: only equipment you have on this platform is part of this drill. 			
Other:			
Other:			
Comments:			

BLANK

Facility (print):	Facility PIC (print):	Crew:
Emergency Situation/Conditions:		
Helicenter Status:	Field Boat Status:	
Helicopter Status:		
Real-world conditions: Personnel available: whoeve Weather: wind and sea cond Resources: only equipment Other: 	ditions are actual (whateve	er you are experiencing).
Other: Comments:		

Attachment D

Hurricane Evacuation Checklist

Facility:	Facility PIC (print):	Cre	w:	
Observer (print):	Observer Signature:	Date	e:	
Observer of observ		Yes	No	NA
Has a written, real-world scenario been prepared specifically for this facility?				
Was scenario given to someone other than the Facility PIC? Who?				
 If yes, was scenario given to Facilit 				
Pre-Season Preparations:				
 Have the proper steps been taken I 	by May2 Refer to list in Plan (4)			
During the Season:				
 Have checks been made every mo 	nth? Refer to list in Plan (5.)			
Has Facility PIC received timely "alert"				
Operations? Refer to list in Plan (6.A.).				
Has information and plot position been re	corded on hurricane tracking chart?			
Phase 1: When storm is maximum of 400				
Have all materials been secured?				
	een addressed? Refer to Attachment II.			
	Refer to list in Phase 1 (6.B.) in Plan.			
Phase 2: When storm is maximum of 300				
	een addressed? Refer to Attachment II.			
	Refer to list in Phase 2 (6.C.) in Plan.			
Phase 3: When storm is maximum of 200	•			
	been addressed? Refer to Attachment II.			
	n? Refer to list in Phase 3 (6.D.) in Plan.			
Have checklists in Attachment I been con				
Have Phase 1 checklist in Attachment II b				
Have Phase 2 checklist in Attachment II b				
Have Phase 3 checklist in Attachment II b				
Have production platforms been secured				
Have drilling/work-over rigs been secured				
Have work-over/completion consideration				
If evacuation necessary, have the following				
	all wells are shut in and everything is			
secured as described above.				
	t and/or Director – Rig Operations that			
personnel are being evacuated (co				
	olug all appliances. Advise pilot radio is			
being disconnected.				
Lock doors to living quarters.				
	licopter or boat and evacuate to regular			
shore base.				
 Report to Production Superintence confirming all personnel have been 	dent and/or Director – Rig Operations evacuated.			
 Advise onshore personnel of any h or alternate arrangements for return 	ousing requirements, telephone contacts			
	discuss the observations and critique the			
drill process?				
Was safety meeting report completed cov	vering the drill?			
	io and completed checklist given to the			
Facility PIC for placed in the SEMS files?				
Comments:				