



RECORDKEEPING AND DOCUMENTATION

1.0 Purpose

This element identifies Petsec's Recordkeeping and Documentation process for its Safety and Environmental Management System (SEMS) Program; it applies to all Petsec operations. Petsec has elected to set up an electronic filing (eFiling) system to store the records and documents related to our SEMS Program.

2.0 Process

Petsec has elected to store and maintain electronically **ALL** of its SEMS records and documents for at least six (6) years; a copy of these records and documents are kept at our Lafayette offices. Some documents are maintained for the life of the facility, such as Process Design Information, Facility Design Information and other safety and environmental information. All of the records and documents are available upon request. Refer to the list below and the individual elements for complete disposition details.

| Element | Record/Document | Disposition |
|---|---|---|
| NA | SEMS Program manuals (binder and on-line) | Maintained on each manned facility and in the Lafayette office, hard copy and electronic copy. |
| General | Annual SEMS Reviews | Reviewed, filed and maintained for 6 years. |
| Safety and Environmental Information | Process Design Information; Mechanical Design Information; Plans and Programs | Maintained on facility for life of facility; changes in Plans, Programs, Process and Mechanical Design information submitted to BOERME. |
| Hazards Analysis | JSEA; Hazards Analysis Reports | JSEA maintained for 30 days; JSEA and HA Reports filed and maintained for 6 years. |
| Management Of Change | MOC Forms | MOC Forms are documented and dated, then filed and maintained for 6 years. |
| Operating Procedures | Operating Procedures | Updated when changes occur; and filed and maintained for 6 years. |
| Safe Work Practices and Contractor Selection | SEMS Written Agreements; Documentation of Job Performance forms; Evaluations; Orientation forms | Written Agreements, Knowledge and Skills Worksheet and Orientations filed and maintained for 6 years. |
| Training | Training Matrix; Training Reports | Updated as changes occur, Matrix and Report filed and maintained for 6 years. |
| Mechanical Integrity | Testing and Inspecting Checklists | Checklists filed and maintained for 6 years. |
| Pre-Startup Review | Safety, Pre-Commissioning and Startup Plans | Plans filed and maintained for 6 years. S&E Information becomes part of S&E element. |
| Emergency Response and Control | Emergency Response Plan; Oil Spill Response Plan; Hurricane Evacuation Plan | Updated when changes occur; Plans filed and maintained for 6 years. |
| Investigation of Incidents | Investigation Reports; Injury and Illness Logs; MMS-131 Forms | Reports, Logs and Forms filed and maintained for 6 years. MMS-131 submitted annually, divided into quarters. |
| Audits | Audit Plans, Audit Reports and Corrective Action Plans | Plans and Reports are sent to BOEMRE. Reports filed and maintained for 6 years. |

2.1 Procedure

Recordkeeping and documentation vary slightly within the other twelve (12) elements; those specific procedures are found in the particular elements. However, all records and documents are kept in an orderly manner, are readily identifiable, retrievable and legible, include the date of any and all revisions, and are reviewed periodically. All records and documents are available electronically (via computer), with server backup. All records and documents are available upon request.

2.2 Changes

When changes are made to the elements, revisions are made to the affected element and distributed to the Facility PIC to place in the SEMS Program binder.

3.0 Training

- 3.1 Train all affected employees every five (5) years in the contents of this element; refer to the Training element.
- 3.2 Train all affected, newly-hired employees within 30 days of date of hire in the contents of this element; refer to the Training 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 records, reports and documents that are placed in SEMS files and are retained as described in the Table above for at least six (6) years.
- 4.2 Copies of hazards analyses and audits are kept until the next hazards analyses and audits for the specific facilities are conducted.

5.0 Attachments

None