


# **WALTER OIL & GAS CORPORATION**


## **WELL CONTROL AND PRODUCTION SAFETY TRAINING PLAN**

**In Compliance with  
30 CFR Part 250,  
Oil and Gas and Sulphur Operations in the Outer Continental Shelf,  
Subpart O  
Well Control and Production Safety Systems Training**

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Subject:	<i>Well Control and Production Safety Systems Training Plan</i>	Revision Number:	<b>Original</b>
		Revision Date:	<b>10/11/2002</b>

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## Purpose

This plan is established to fulfill requirements of 30 CFR Part 250, Oil and Gas and Sulphur Operations in the Outer Continental Shelf, Subpart O – Well Control and Production Safety Systems Training. Walter Oil & Gas Corporation (WOG) operates entirely with Contract personnel in all the field personnel positions of its OCS operations. Therefore this plan is intended to define the minimum requirements for WOG Contract Employers whose personnel are engaged in Well Control and Production Safety Systems Operations in Outer Continental Shelf waters in the Gulf of Mexico. The plan defines the auditing and testing requirements WOG may utilize to determine if Contract Employers are training their employees in a manner that meets the requirements of this plan. Should WOG change its manning strategy to include WOG employees in the field personnel positions offshore, the training plan will be modified accordingly.

### I. 250.1500 Definitions


Employee: means direct employees of the lessees who are assigned Well Control or Production Safety duties.

I or You: means the lessee engaged in oil, gas, or sulphur operations in the Outer continental Shelf (OCS).

Lessee: means an entity that has entered into a lease with the United States to explore for, develop, and produce the leased mineral. The term lessee also includes an owner of operating rights for that lease and the MMS approved assignee of that lease.

Production Safety: means production operations as well as the installation, repair, testing, maintenance or operation of surface and subsurface safety devices.

Well Control: means drilling, well completion, well workover and well servicing operations. For purposes of this subpart, well completion/well workover means those operations following the drilling of a well that are intended to establish or restore production to a well. It includes small tubing operations but does not include well servicing. Well servicing means snubbing, coil tubing and wireline operations.

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**II. 250.1501 What is the goal of my training program?**

The goal of the WOG training program is to ensure safe and clean OCS operations. This plan has been developed to ensure that WOG Contractor personnel engaged in Well Control or Production Safety Systems operations understand and can properly perform their assigned duties.

**IV. 250.1502 Is there a transition period for complying with the regulation in this subpart?**

Effective October 15, 2002, the requirements of this training program will be fully implemented within WOG.

The timeframe for the transition to the competency based regulations will necessitate that WOG accept prior forms of training documented under the old MMS guidelines, (pre-Oct 2001), in the form of valid MMS Well Control, Well Servicing and Production Safety Systems certificates from MMS accredited training schools. This will be accepted as prior certificates of competency until the expiration of the certificate, or until an audit proves otherwise.

All Personnel who perform Well Control or Production Safety Systems duties must have a valid certificate from a previously certified MMS school during and after the transition period or must be re-certified by:


- Attending and completing training from schools that are IADC WellCAP certified and/or API RP T-6 or API RP T-2 accredited.

or

- Complete training using alternative methods, such as computer based or classroom and hands on modules to document and ensure competency in performing their Well control or Production Safety Systems duties, whose training programs followed guidelines set out in IADC WellCAP, API RP T-6 for wireline operations (see below), and /or API RP T-2 and has been accepted as being satisfactory by WOG for their respective areas of responsibility.

Note:

Personnel who operate slick wireline or electric wireline BOP's must be trained to operate these BOP's correctly and safely. In the past, (pre-Oct 2002), this training was not generally formalized and was part of the in-house qualifying process of each wireline company. This is a new regulatory requirement and IADC and API have developed minimum training standards that WOG will approve for all well control issues related to slick or electric wireline well control. However, a phase

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in period is required to allow all personnel to be IADC Well CAP certified, attend a school accredited by API to teach to T-6 standards or attend a school that satisfactorily meets this additional training requirement.

This phase-in period is applicable to all experienced wireline operators who were on the job performing wireline-related well control operations prior to 10/15/2002 and would be valid until 10/15/2003. After 10/15/2003, all wireline personnel who perform wireline related well control duties must be IADC WellCAP certified, have attended and passed an API RP T-6 accredited school, or a program teaching IADC WellCAP or API RP T-6 requirements.

Finally, where Well Control duties are discussed, when dealing with wireline BOP, either electric line or wireline, API RP T-6 can be substituted for IADC WellCAP training.

**V. 250.1503 What are my general responsibilities for training?**

A. You must establish and implement a training program so that all of your employees are trained to competently perform their assigned well control and production safety duties. You must verify that your employees understand and can perform the assigned well control or production safety duties.


WOG has no employees who perform well control or production safety system duties in the OCS. Hence, this does not apply.

B. You must have a training plan that specifies the type, method(s), length, frequency, and content of the training for your employees. Your training plan must specify the method(s) or verifying employee understanding and performance.

WOG has no employees who perform well control or production safety system duties in the OCS. Hence, this does not apply.

*1) Procedures for training employees in well control or production safety practices:*

WOG has no employees who perform well control or production safety system duties in the OCS. Hence, this does not apply.

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2) *Procedures for evaluating the training programs of your contractors:*

WOG requires that all Contractors supply qualified individuals to perform Well Control or Production Safety Systems activities. Each Contract Employer is required to have available a training plan documenting how its personnel have been trained and evidence of competency in performing Well Control or Production Safety System operations. This plan will be made available to WOG upon request. Contract Employer will maintain documentation supporting successful completion of the training and validation of job knowledge for each person supervising or having responsibilities in Well Control or Production Safety Systems activities on a WOG facility or lease.

The Contractor's training plan will be subject to audit by WOG or its designated representative, to conduct onsite reviews of training records and/or witness the training presentations and job task evaluations to ensure all requirements of this section are being fulfilled. Training plans will be audited based on performance problems detected during field evaluations conducted on Contractor Employees as per Section V.B.6).

3) *Procedures for verifying that all employees and contractor personnel engaged in well control or production safety operations can perform their assigned duties:*


WOG has no employees who perform well control or production safety system duties in the OCS. Hence, this does not apply.

WOG Contract Personnel

Successful completion and a valid certificate from a previously accredited MMS school verifies that Contract Personnel engaged in Well Control or Production Safety Systems have completed training and therefore possess the knowledge to perform their assigned duties. Contract Personnel whose certification has expired or new hires must successfully complete the relevant IADC WellCAP, API RP T-2 or API RP T-6 training to verify that they possess the knowledge to perform their assigned duties. Verification or certificate validity will be performed as follows:

Production Operations/Non-Rig Well Servicing

Contract Personnel on a WOG facility or lease to with duties that include Production Safety Systems or Well Control (wireline,

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coiled tubing, snubbing, etc.) shall be prepared to present documentation of successful completion of training in Production Safety Systems or Well Control, pertinent to their job duties.

Acceptable documentation shall consist of a non-expired certificate from a school previously accredited by the MMS, or currently accredited by the API in API RP T-2 or API RP T-6 training or by the IADC in WellCAP training.

Drilling and Well Servicing, Rig Related

Successful completion of the IADC WellCAP program will verify that Contract Personnel engaged in Well Control operations have completed the required training and can perform their assigned duties. Contract Personnel shall be prepared to present documentation of successful completion of WellCAP certificates.

Participation in required regulatory drills will serve to verify their continued ability to perform their assigned duties. If the assessments of the drills and/or performance during actual and/or potential well control events show areas of deficiency or weakness WOG may decide to administer written or hands-on testing to the Contractor Personnel to determine their understanding of well control situations. Deficiencies will be corrected as soon as practically possible.


Certificate Validity

Confirming a valid certificate, the Certificate must be:

- API RP T-2 Accredited for Production Safety System
- API RP T-6 for Wireline Well Control
- IADC WellCAP for relevant jobs

Expiration dates should be examined to confirm that they fall within the following guidelines:

<u>Training Qualification</u>	<u>Retraining Interval</u>
<b>Well Control (IADC WellCAP)</b>	Maximum of 2 years
<b>Well Servicing (IADC WellCAP)</b>	Maximum of 2 years
<b>Production Safety Systems (API RP T-2)</b>	Maximum of 3 years

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**Wireline Well Control (API RP T-6)      Maximum of 2 years**

WOG Contract Personnel maintaining their training certification for Well Control or Production Safety Systems shall attend retraining within 30 days after the expiration date of their existing certification. Personnel will not be allowed to supervise or perform Well Control or Production Safety System operations 30 days after the expiration date of their valid certification.

4) *Procedures for assessing the training needs of your employees on a Periodic basis:*

WOG has no employees who perform well control or production safety system duties in the OCS. Hence, this does not apply.


5) *Recordkeeping and documentation procedures:*

All WOG Contract Personnel having Well Control or Production Safety Systems responsibilities shall have available valid documentation of successful completion and/or certification from a previously approved MMS training school or a school following guidelines of IADC WellCAP, or accredited by API for API RP T-2 or T-6. Verification of expiration dates obtained as per V.B.3) above will be available upon request from the Contract Employers.

All tests and/or task assessments relating to production operations given during audits or evaluations performed by the Contract Employer shall be kept on record at the Contract Employer's office. All tests and/or audits in conjunction with drilling, well completion, well workover, or well servicing of non routine nature shall be on record at the Contract Employer's office. Contractors will keep and maintain documentation and records for a period of 5 years for all active duty Contract Personnel, and will make them available to WOG upon request.

6) *Internal audit procedures:*

WOG, or a third-party selected to perform an audit, will occasionally review the training records of randomly selected Contract Employers to identify areas of deficiency within their training plan and determine if changes to their program are warranted. Audit frequency will be based on

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Contract Personnel performance or any concerns by WOG that generates a need for an audit. The audit results will be documented.

The audit may include, but not be limited to:

- Evaluating records to determine retraining needs based upon expiration of present MMS certification or retraining under the provisions of this plan.
- Giving and evaluating written or hands-on test to identify work force trends in skill knowledge.
- Reviewing the follow-up of Contract Personnel identified through testing or job task assessments as needing supplemental training and re-evaluation.
- Random observing of Contract Personnel on WOG facilities or leases to determine areas of deficiency or weakness in the Contractor's training program.
- Reviewing the progress toward corrective action of any findings identified from audits conducted of the Contractors' written program.

C. Upon request of the Regional or District Supervisor, you must provide:

- 1) *Copies of training documents for personnel involved in well control or production safety operations during the past 5 years.*


Upon request of the Regional Supervisor WOG will provide copies of training documentation for Contract Personnel involved in Well Control or Production Safety Systems Operations during the past 5 years or the time period the Contract Personnel has been currently working for the Contract Employer, whichever is least.

- 2) A copy of your training plan.

A copy of the WOG training plan for Contract Personnel engaged in Well Control or Production Safety Systems Operations will be maintained at the WOG Houston office. This plan may be maintained in hard copy format or as an electronically stored data and is subject to being submitted to the MMS upon their request.

**VI. 250.1504 May I use alternative training methods?**

You may use alternative training methods. These methods may include computer based learning, films, or their equivalents. Appropriate demonstrations and

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“hands-on” training /should reinforce this training. Alternatives training methods must be conducted according to, and meet the objectives of your training plan.

WOG allows Contractors the use of alternative training methods. The alternative methods must meet the curriculum requirements of IADC WellCAP, API RP T-2 or API RP T-6.

**VII. 250.1505 Where may I get training for my employees?**

WOG has no employees who perform well control or production safety system duties in the OCS. Hence, this does not apply.

**VIII.250.1506 How often must I train my employees?**

*You determine the frequency of the training you provide your employees. You must do all the following:*

- A. Provide periodic training to ensure that employees maintain understanding of, and competency in, well control or production safety practices;*

WOG has no employees who perform Well Control or Production Safety System duties in the OCS. Hence, this does not apply.

- B. Establish procedures to verify adequate retention of the knowledge and skills that employees need to perform their assigned well control or production safety duties; and*


WOG has no employees who perform Well Control or Production Safety System duties in the OCS. Hence, this does not apply.

- C. Ensure that your contractors’ training programs provide for periodic training and verification of well control or production safety knowledge and skills.*

Certification statements from each Contractor Company whose employees perform Well Control or Production Safety activities indicating that their plans provide for training that meet the WOG training requirements. Audits for compliance with their plans will be conducted as in section V.6) above.

**IX. 250.1507 How will MMS measure training results?**

Please see below.

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**X. 250.1508 What must I do when MMS administers written or oral tests?**

Please see below.

**XI. 250.1509 What must I do when MMS administers or requires hands-on, simulator, or other types of testing?**

Please see below.

**XII. 250.1510 What will MMS do if my training program does not Comply with this subpart?**

Please see below.

Sections IX to XII of this plan pertain to Subpart “O” of 30 CFR 250, Parts 250.1507 through 250.1510 on MMS actions or the lessee’s response to MMS action. WOG recognizes the MMS retains the right to test, written or orally, WOG Contract Personnel as a method to measure personnel competency and/or effectiveness of the WOG training program. WOG will fully cooperate and respond to the MMS in an expedient manner.