## **SEMS Recordkeeping & Documentation**

1. **Purpose**

The purpose of this policy is to ensure that records and documents are maintained in a manner sufficient to implement the SEMP (Safety Environmental Management Program).

1. **Procedure**

The following procedures should be applied to SEMS record and document control:

* Readily retrievable and protected against damage, deterioration or loss.
* Periodically reviewed, revised as necessary and approved for adequacy by authorized personnel.
* Current versions of relevant documents are available at all locations where operations essential to the effective functioning of the safety and environmental system are performed.
* Retained for specified periods of time.
* Obsolete documents are promptly removed from all points of issue and points of use or otherwise assured against unintended use.
* Obsolete documents retained for legal and/or knowledge preservation purposes are suitably identified.
* Confidential records and documentation are identified and properly handled
* Made available to Operator Clients & the Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE) at all locations where any elements of the Company’s Safety & Environmental Management System is essential to operations.

1. **Records & Documentation**

Recordkeeping requirements vary according to each SEMS program element. Records are maintained per 30 CFR 250.1928 and as follows:

* SEMS program procedures, records and documents shall be maintained for a minimum of 6 years, except as indicated below.
* All records and documentation will include a date, revision date, located and maintained in an orderly manner, readily identifiable and easily transferrable.
* All SEMS audits are documented and kept for 6 years and are available to BSEE upon request.
* JSAs will be documented and kept onsite for 30 days. The document will be retained for 2 years and made available to BSEE upon request.
* All management of change provisions are documented as specified in 250.1912, retained for 2 years, and made available to BSEE upon request.
* Injury and illness records will be maintained for 5 years and made available to BSEE upon request.
* Evaluations completed on contractor’s safety policies and procedures will be maintained for 2 years and made available to BSEE upon request.
* Facility level hazard analysis shall be maintained for the life of the facility.

Hardcopy and electronic records associated with all elements of its Safety & Environmental Management System (SEMS) shall be maintained. Electronic folders and documents binders are maintained individually based on each program element. Records and documentation may include, but not limited to, one or more of the following:

* Incident Reports
* Compliant Records
* Process Information
* Product Information
* Organizational Charts
* Pertinent Supplier Information
* Employee Training & Certifications
* Employee Knowledge & Experience
* Significant Environmental Information
* Information on Applicable Regulations
* Inspection, Calibration & Maintenance Records
* Emergency Preparedness & Response Information
* Internal Audit Results & Management Reviews
* Documented agreement between Company & Operator regarding contractor safety and environmental policies and procedures.

1. **Management Review**

An annual review process has been established to determine if the Company’s “Safety & Environmental Management System” continues to be suitable, adequate and effective. The management review shall address the possible need for changes to policy, objectives and other program elements. Additionally, the review shall take into consideration program audit results, changing circumstances and the need for continual improvement. The annual review process shall be documented to include all findings and actions items.