

	<b>SUBPART O - WELL CONTROL &amp; PRODUCTION SAFETY PROGRAM</b>	Document No.:	HSE-OP-031
		Department:	Operations
		Revision Date:	06 APR 2010
Release authorized by:	D. Slattery	Page	Page 1 of 3

## **Purpose**

---

Trinity personnel should never operate our clients' drilling, production or safety systems equipment. Depending on conditions and our client's risk management plans, the necessity for our personnel to act as a failsafe is not unforeseeable. Therefore, Trinity Medical Management ("Trinity") has implemented the following Well Control and Production Safety Training Program.

- A written client safety policy establishes guidelines to be followed for Trinity personnel operating on client projects.
- Any Trinity personnel operating on a client project with assigned well control or production safety duties will have the applicable training.

The effectiveness of the WCPSP depends upon the active support and involvement of all employees. This plan is intended to implement a program to ensure that all work practices are carried out safely to minimize the possibility of injury or harm to employees, Trinity's or its client's assets, and or the environment. It is intended to serve as an additional tool in safeguarding the health and safety of employees.

This document is provided to ensure adequate training plans, policies and procedures are communicated to all participating employees. This program aims to prevent untrained personnel from operating drilling or production safety equipment. However, as of the date of this program, no Trinity personnel have Well Control or Production Safety duties on any Trinity project.

## **Administrative Duties**

---

The Training and Compliance Manager is responsible for developing and maintaining the program. A copy of the plan may be reviewed by employees. It is located in Operations Office. In addition, the TCM is responsible for maintaining any records related to the WCPSP.

If after reading this program, you find that improvements can be made, please contact the Training and Compliance Manager. Trinity encourages all suggestions because we are committed to the success of our Well Control & Production Safety Program. We strive for clear understanding, safe behavior, and involvement from every level of our company.

## **Training Requirements**

---

### Company Requirements & Procedure

- Trinity makes sure that affected company employees receive training on all hazards to which they will be introduced.
- Employees will be identified by classification and training matrix
- The TCM will contact employee and coordinate scheduling of training.

	<b>SUBPART O - WELL CONTROL &amp; PRODUCTION SAFETY PROGRAM</b>	Document No.:	HSE-OP-031
		Department:	Operations
		Revision Date:	06 APR 2010
Release authorized by:	D. Slattery	Page	Page 2 of 3

- Upon completion, training provider and employee will verify class completion and ensure that certification is on file for employee, including the expiration date of the certification or the expected date of periodic training.

Both Well Control and / or Production Safety Systems Training, if required by MSA, client request, or management of change will:

- Be delivered by third-party computer-based testing
  - The training provider will be an API accredited provider for the class and the delivery method specified by the program.
  - Alternate training methods will be considered on a case-to-case basis, and must be submitted in writing to both the TCM and the Operations Manager and be accompanied by rationale. This must be submitted prior to starting the CBT, and preferably during the scheduling period.
    - i. Alternative training methods must be verified by a practical “hands on” element.
    - ii. The description of the supplemental demonstrations / “hands on” training must accompany the request for alternate training methods.
- Classes will be self-paced, but should take no longer than 2 days to complete
- Frequency:
  - Well Control – Initially
    - i. Periodic (refresher) – every 2 years
  - Production Safety Systems – Initially
    - i. Periodic (refresher) – every 3 years
  - A written or Computer based knowledge review will be administered commensurate with all initial and periodic training.
- Verification:
  - Knowledge will be verified by written knowledge review / testing as part of the training
- Subcontractors will be required to verify classes and valid certifications that meet IADC Well Cap and API RP T-2 criteria for well control and production training.

### Training Curricula

<b><i>Well Control Training</i></b>	<b><i>Production Safety Systems Training</i></b>
Pressure Basics	Maintenance
Fluids	Installation and Repair of Safety Systems
Equipment	Level Safety High/Low
Kick Theory, Causes & Detection	Pressure Safety High/Low
Procedures	Pressure Safety Valves
Well Control Methods	Well Control Panel I and II
Complications	Safety Analysis and System Design
Special Situations	Regulatory Material
Rules, Orders & Policies	Smoke

	<b>SUBPART O - WELL CONTROL &amp; PRODUCTION SAFETY PROGRAM</b>	Document No.:	HSE-OP-031
		Department:	Operations
		Revision Date:	06 APR 2010
Release authorized by:	D. Slattery	Page	Page 3 of 3

Remedial Operations	Thermal
Coiled Tubing, Snubbing, & Wireline	UV and Gas Detection

## Recordkeeping Requirements

---

The Company will:

- Identify by classification and via training matrix, employees who require / need training in Well Control or Production Safety Systems.
- Have a copy of the contract/MSA/management of change documentation on file and be thoroughly familiar with its contents, and with the requirements of the work that necessitate well control or production safety systems training.
- Keep records of all documentation of any sort given to you by the subcontractor, including records of training, audits, and verifications.
- Audit the training program annually in order to identify any nonconformities and / or opportunities for improvement. Audits will be compliant with the Trinity Internal Audit Protocol.
- Retain all documentation pertinent to Well Control and / or Production Safety Systems training for a period of time no less than 5 years. This includes all inquiries, reviews, audits, and training certifications.

## MMS Review

---

Trinity and any of its personnel (including subcontractors) will comply unconditionally with all MMS inquiries or audits. This includes, but is not limited to, training and compliance, skill performance, and knowledge reviews.

MMS or its authorized representatives may test Trinity or subcontract employees at any Trinity project site or at an on-shore location.

Training documentation and the documented program are available for review upon request of by the Regional or District Supervisor or requesting owner/client.