

Great Western Painting

Subpart O - Production

Well Control and Production Safety Training

Subpart O—Well Control and Production Safety Training

Note: On Oct. 1, 2011, the Department of the Interior formally established two new, independent bureaus – the Bureau of Safety and Environmental Enforcement (BSEE) and the Bureau of Ocean Energy Management (BOEM) – to carry out the offshore energy management and safety and environmental oversight missions that were under the jurisdiction of the Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE). The establishment of BOEM and BSEE marks the completion of an effort to reorganize the former Minerals Management Service (MMS).

Note: § 250.1500 through § 250.1510 applies specifically to lessees.

Note: All our employees engaged by the lessee are knowledgeable and experienced in work practices necessary to perform their job in a safe and environmentally sound manner. We will provide any additional training the lessee requires.

Our employees may get training from any source that meets the requirements of the lessee's training plan. The training source, which must be listed on the lessee's training plan, could include an approved in-house trainer or an outside training center/sponsor.

If the lessee conducts operations with a subsea BOP stack, their employees and our employees must be trained in deepwater well control. All trained personnel must have a comprehensive knowledge of deepwater well control equipment, practices, and theory.

The lessee's training plan must:

1. identify the methods used for training such as computer-based-training, OJT, films, classroom, etc..
2. state how often the training is provided, i.e., 4 hours, 8 hours, 3 days, 5 days, etc..
3. state how often the training is provided.
4. provide course curriculum: lesson plans showing course content, or course outline with time schedule.
5. contain a description(s) of the methods utilized to ensure the employees understand and comprehend the training.
6. state in order how the employee will advance through the training process.

7. reflect how the employer verifies that employees have been trained and can perform their assigned duties.
8. reflect how often personnel are assessed/tested. This should be consistent with the same frequency of training
9. reflect training records are kept in accordance with established procedures.
10. describe the audit process of the training program and provide examples of completed audits.
11. state training documentation and training program are available for review upon request by the Regional or District Supervisor or requesting owner.
12. state training records are maintained for a minimum of 5 years.
13. must reflect periodic training is provided to ensure that employees maintain understanding of, and competency in, well control or production safety practices.
14. identify what methods will be used to ensure the employee retains the training they received. These should be consistent with the frequency of training.
15. identify alternative training method(s) utilized by providing a description of the alternative methods

Our employees are aware the BSEE may measure the lessee's training program using one or more of the below methods, three of which directly impact our employees:

1. *Training system audit.* BSEE or its authorized representative may conduct a training system audit at their office. The training system audit will compare the lessee's training program against subpart O. The lessee must be prepared to explain their overall training program and produce evidence to support their explanation.
2. *Employee or contract personnel interviews.* BSEE or its authorized representative may conduct interviews at either onshore or offshore locations to inquire about the types of training that were provided, when and where this training was conducted, and how effective the training was.

3. *Employee or contract personnel testing.* BSEE or its authorized representative may conduct testing at either onshore or offshore locations for the purpose of evaluating an individual's knowledge and skills in perfecting well control, deepwater well control, and production safety duties.
4. *Hands-on production safety, simulator, or live well testing.* BSEE or its authorized representative may conduct tests at either onshore or offshore locations. Tests will be designed to evaluate the competency of the lessee's employees or contract personnel in performing their assigned well control, deepwater well control, and production safety duties. The lessee is responsible for the costs associated with this testing, excluding salary and travel costs for BSEE personnel.