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	Subpart O Training Plan		

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1.0 Purpose

This plan is designed and established to fulfill requirements of 30 CFR Part 250, Oil and Gas and Sulphur Operations in the Outer Continental Shelf, Subpart O Production Safety Training.

It is further intended to define the requirements for the training of Company employees engaged in Oil and Gas and Sulphur Operations in the OCS.

2.0 Goal

The goal of the Company Training Program is to be recognized as the safest and most environmentally conscious operator in the markets we serve and to be known for complying with applicable regulations.

This plan was developed and shall be communicated to ensure that Company employees, who are engaged in Productions Safety Operations, understand, communicate and effectively perform their assigned job duties.

3.0 Scope

All GIS Holdings, LLC Companies and affiliates including, Blanchard Industrial, LLC, GIS Engineering, LLC, Grand Isle Shipyard, LLC., GWIS, Mack Steel, NuWave, Valvemax, Discovery Industries, Inc., Global Inspections, LLC, and EIS, hereafter identified as “Company”.

The training plan applies to all Company employees involved in U.S. Gulf of Mexico operations. This information is directed to all employees however the following job titles are required to follow the guidance of this document:

- **Lead Production Operator**
- **Level “A” Production Operator**
- **Level “B” Production Operator**
- **Level “C” Production Operator**
- **Level “D” Production Operator**

4.0 Administrator

The Training Administrator is responsible for ensuring that the process is effective and that all employees are trained according to, and comply with, the overall administration of the Company Subpart “O” Training Plan and the stated regulations as defined by 30 CFR Part 250 Subpart “O.”

5.0 Management Responsibilities

Senior Management shall provide commitment and resources required to implement the program as outlined and defined by the regulatory standard of 30 CFR Part 250 Subpart “O”. They shall also ensure that Programs such as this one are “Bridged” and are in compliance with each Operator that the Company will work for. This shall be done prior to the Company operating on Customer property and documentation of such shall be kept at the Corporate office in Galliano, LA.

Project Managers/Offshore Production Managers are responsible to insure personnel attendance and participation within the Subpart “O” Training Plan.

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Assessors are responsible for evaluating employees' skills/knowledge within the Subpart "O" Training Plan, including, but not limited to, on/off site assessment, training, record keeping, data management and auditing systems. (Note: Assessors may be approved third party contractors, or Company employees.)

Training Coordinators are responsible for the daily activities of the Subpart "O" Plan including, but not limited to, scheduling, record keeping, data management, auditing systems and employee and training assessment programs.

6.0 Training Plan Overview

The scope of the plan includes methods that will be implemented so all employees are trained and can competently perform their Production Safety Systems duties as defined by 30 CFR Part 250 Subpart "O."

To maintain the effectiveness of the training plan and to maximize the use of innovative training techniques, the course lengths shall be flexible.

Company employees will be administered training assessments involving written and/or hands-on testing to evaluate the employees' retention of training materials and their knowledge of assigned duties.

Note: Company personnel are required to take only the training that is applicable to their job duties. They are not required to take Well Control or Well Servicing training if their duties do not include directly supervising such activities. Those roles/activities include but are not limited to drilling, well completion, well workover, snubbing, coil tubing, and wireline operations. At a minimum all Company field employees must maintain Production Safety Systems training as specified in this plan.

7.0 Training Protocol

The Company training plan incorporates alternative training methods to complement those previously approved by BSEE in Production Safety Systems Operations. To accommodate logistics, reach all types of learners and assure the best retention, we shall utilize conventional classroom type instruction and hands-on simulations conducted by external training providers. The primary criterion for the training program selection is its accreditation by API. This training must be 3 days long and employees must attend the full course every 3 years, for new hire employees.

Additionally, the plan provides for a Refresher/Test-Out Training Option in lieu of the conventional 3 day PSST for experienced personnel that meet the following requirements:

- 6 years onshore/offshore (OCS) oilfield experience
- Successful completion of two instructor-led PSST (T2) courses
- Possession of current, valid PSST certification.

The best available techniques will be used to challenge personnel and offer the latest technological advancements to enhance employee skills and knowledge, depending on the experience level and job description of the employee and his assigned duties.

- Programs accredited by API
- Conventional classroom instruction
- Self-paced computer based modules with hands-on training
- Assessment testing programs
- Pre-testing of employees to determine deficiencies, to target learning needs

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- Off-site reading, visual & audio materials
- Off-site hands-on, group and individual instruction
- Model cutaways and static representations of actual production safety equipment
- Operating process models of production, control and safety equipment
- Pictorial representations and drawings of operational equipment, processes, and methods of operation
- Face-to-face and other means of evaluation of hands-on activities
- Several variations of exams with assorted questions to ensure test form diversity
- Employee feedback of examination results to target additional learning opportunities
- Set employee plans for the continuing education and well control, well servicing, and production safety performance during normal workplace operations

8.0 Alternative Training Methods

The Company training plan may incorporate alternative methods (as approved) to complement those previously approved by BSEE in Well Control.

Well Servicing and Production Safety Operations. In addition to standard classroom presentations, the Company may incorporate self-paced, computer delivered, interactive training and assessment programs as well as vendor presentations on the latest technological advancements to enhance employee skills and knowledge.

Re-enforcement of hands-on competency will be provided at the jobsite in the form of on-the-job-training, drills, equipment operational tests and continuous education and hands-on training as needed.

9.0 Recognized Training Providers

The Company will continue to utilize classroom and hands-on simulations in Well Control, Well Servicing and Production Safety Operations conducted by internal or external training providers. Computer based, interactive training may be used in some applications to challenger personnel and offer an alternative training format.

For contractor operations we will recognize training from all previously accredited BSEE training entities. Contractor in-house programs or newly formed outsourced providers shall ensure that such training meets or exceeds previously approved BSEE training schools and ensures the participants knowledge and competency. All contractor training classes and materials are subject to a Company audit, approval and acceptance. The Company reserves the right to accept or reject contractor training on a case by case basis. The company shall only utilize schools approved by our Training Center and on our Approved Vendor List after proper review.

10.0 Implementation and Transition

The time frame for the transition to the competency based regulations will not necessitate that the Company accept prior forms of training documented by previous BSEE guidelines, in the form of valid BSEE Production Safety Systems certificates from BSEE accredited training schools. This plan has been revised and implemented after the transition period.

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All Personnel who perform Production Safety Systems duties must have a valid certificate from a school accredited by API for Production Safety Systems (T-2) Training or must be re-certified by:

- Attending and completing training from schools that are API RP T-2 accredited.

11.0 Verification of Competency

Introduction

To ensure that employees are able to competently perform their assigned work duties according to their classification, the Company has in place the following procedures:

- Pre-hire Interview – Once an applicant is considered for hiring, a pre-employment interview is conducted by in-house Production Personnel. With an employee assessment sheet/interview questionnaire, and one-on-one production task discussion, the applicant is appropriately classified.
- Pre-hire Evaluation - During the Pre-hire Interview, if an applicant is determined to be a B Operator or higher they will then complete a computerized evaluation or written assessment to further assess their production knowledge in the following areas: Gas Compressors, Production Vessels, Pumps, Glycol Dehydration and Heated Vessels. We use this evaluation combined with the oral interview to assign an individual to the appropriate position and facility.
- Safety Training Review – As part of the hiring process the applicant must meet with the Safety Training Department for a review of any current safety training they may have and/or to be scheduled for training they may need prior to going offshore.
- Annual Skill & Knowledge Assessment – To insure employees’ competency and retention of knowledge, any employee maintaining Production Safety Systems Training, will be assessed on an annual basis. This can be done in the form of on-site evaluations, oral questions, written quizzes, etc.
- Any employee who will advance shall be advanced through the training process. This process will be initially through OJT but then verified by written assessments.
- To avoid expiring training while an employee is offshore, the company has a system that notifies managers of expiring training and certifications on a 30, 60, and 90 day period. The company has this system in place to ensure that employees are certified to perform their job tasks, and those certifications do not expire while offshore.
 - If an employee is assessed and gaps are found, the employee is not allowed to perform those tasks until re-assessment with satisfactory results. This is managed in accordance with our Skill and Knowledge Management System.
 - Gaps are tracked on our Gap Closure Form until closure.
 - The employee may perform tasks that they were not “not yet competent” under the direct supervision of the supervisor or with an assigned mentor.

12.0 Continuous Improvement

Any change in facility equipment, physical facilities or regulatory requirements will be reviewed immediately and the changes implemented as needed.

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13.0 Record keeping and Documentations

The Company will keep and maintain documentation and records for a period of five years for all active duty employees. These records will be physically located at the following address:

18838 Hwy 3235
Galliano, LA 70345
Phone: (985) 475-5238

In addition to corporate maintenance of records, the training provider shall maintain hard copies and electronic database of all Company records for a five-year period.

This documentation will consist of training records for employees involved in Production Safety Operations.

Company personnel having Production Safety responsibilities shall have available on-site, documentation of successful completion and/or certification from a school accredited by API for Production Safety Systems (T-2) Training prior to engaging in those activities.

Annually, the Company will perform a self audit of its training records. This audit will be maintained electronically as well as a hard (printed) copy and available for inspection. This review will be documented and all findings will be tracked to closure.

The audit may include, but not be limited to:

- An evaluation of employee certificates and training expiration dates.
- An evaluation of the written or hands-on test results to determine isolated or work force trends in skills/knowledge.
- A follow-up on employees who are identified through testing as needing supplemental training and re-evaluation.
- Deficiencies are tracked by the companies Quality department as they will be performing the audit. This is tracked internally with reports going out to Leadership monthly.
- An employee may test out of refresher. If the score met does not pass the criteria for testing out, then they will have to take the refresher course.

Upon reasonable request of the BSEE Regional Supervisor, the Company will provide copies of training documentation for personnel involved in Production Safety Operations.

Copies of the Company training plan for personnel engaged in Production Safety Operations will be maintained at the Corporate office located in **Galliano, Louisiana**. This plan will be a combined version of hard (printed) copy and electronically stored data. It will be subject to submission to the BSEE upon their request.

14.0 Training Plan Assessment

The Company is prepared to explain the overall training program and produce evidence to support the explanation, should BSEE conduct an audit at our office.

Oral Interviews

Upon reasonable request, the Company will make personnel available to BSEE, or to its authorized representative, for the purpose of conducting interviews at onshore or offshore locations to inquire about

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the types of training that were provided, when and where the training was conducted and how effective the training was.

Testing

Upon reasonable request, the Company will make personnel available to BSEE, or its authorized representative, to conduct testing at onshore or offshore locations for the purpose of evaluating an individual's knowledge and skills in perfecting production safety duties.

Hands-on Testing

Upon reasonable request, if BSEE or its authorized representative conducts or requires the Company to conduct hands-on, simulator, or other types of testing, we will comply and allow the BSEE or its authorized representative to administer or witness the testing.

Written or Oral Testing

Upon reasonable notice, the Company will make employees available for BSEE or its authorized representative to administer written or oral tests.

Training Evaluation

The Company will randomly require a Training Evaluation Form as outlined in Appendix (IV) be completed for Production Safety Systems Training to insure appropriate topic coverage. This random training evaluation will be performed at least once each calendar year.

Further, when a Company compliance inspector attends Production Safety Systems Training, he will give a more extensive evaluation on the course quality and content.

Personnel Identification

Upon reasonable notice, the Company will make employees' identification information available by employer's name, Job Title, Facility, Years of Experience at Current Position, Years of Experience in Oilfield, Effective training date, and Training Expiration Date.

Cost of Testing

The Company acknowledges and accepts the provisions of this subpart and will pay for all reasonable costs associated with testing, excluding salary and travel costs for BSEE personnel.

15.0 Definitions

Employee: Direct employees of the Company who is assigned Production Safety duties.

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

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

16.0 Appendices

Appendix	I	Production Safety Systems Curriculum Outline
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Appendix I

Curriculum Outline

Basic Production Safety Systems Course T-2

Topic	Details
Government Regulations	30 CFR 250 -Subpart "A" — General -Subpart "C" — Pollution Prevention and Control -Subpart "D" — Oil & Gas Drilling Operations -Subpart "E" — Oil & Gas Well Completion -Subpart "F" — Oil & Gas Well-Workover -Subpart "H" — Oil & Gas Production Safety Systems -Subpart "J" — Pipelines and Right of Ways -Subpart "K" — Oil & Gas Production Rates-Flaring -Subpart "O" — Training -API 14 C -Latest INC Investigations (BSEE and Coast Guard)
Production Process System	Abnormal Conditions Primary & Secondary protection devices

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	Control of undesirable events Safety analysis of production process components Protection concepts
Pressure Sensors	High/Low Pressure Sensors ESP Sensors Surface Safety Equipment
Level Sensors	Various Models
Auxiliary Devices	Various Models

Curriculum Outline (continued)

Basic Production Safety Systems Course T-2

Topic	Details
Temperature Sensors	High/Low Temperature Sensors High Temperature Sensors Burner Safety Low
Gas Detectors	Sensors Unit
Pressure Safety Valves	Safety Relief Units Vacuum Relief Valve O-Ring Seat Plastic Seat Positive Pressure Low Vacuum
Safety Valves	Shutdown Valve Blowdown Valve Control Valve Operations Operation Analysis Force Calculations
Subsurface Safety	Surface Controlled Subsurface Valves

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Valves	Subsurface Controlled Subsurface Safety Valves
Subsurface Control Equipment	Control Schematic System Operation System Shut-Down
Low Flow Sensor	Flow Safety Valve
Hands-on	Including but not limited to: trouble shooting, setting of low and high pilots, setting of low and high levels, setting of pressure safety valve, timing of downhole safety valve shut-ins and gas detectors.

Appendix II

PSST REFRESHER COURSE

J. Schneider and Associates, Ltd. is contracted by the Company to provide a condensed version of a full T-2 training course. This course is for employees who are not due for T-2 re-certification. It is considered a refresher course with emphasis on API 14 C and the Code of Federal Regulations. It is very “field sensitive” in that the latest NTL’s are discussed along with the latest INC (BSEE and Coast Guard) investigations. The refresher course highlights the goals and objectives of safety systems on production platforms and provides a review of the naming of safety devices and the components that they protect.

This refresher also presents an overview of the emergency support systems, some undesirable events, the safety analysis table, the safety analysis checklist and how they all tie into a safety analysis function evaluation chart. Hands-on training and testing (pre & post test) is also incorporated into this annual refresher training.

Selections of the Code of Federal Regulations covered are:

- Subpart “C”- Pollution Prevention and Control
- Subpart “J”- Pipelines
- Subpart “H”- Production Safety Systems

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In summary, the course keeps the employee knowledgeable in how to operate safely within the boundaries of the law.

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Insert Qualifying Production Operators doc here....

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PRODUCTION SAFETY SYSTEMS
TRAINING EVALUATION FORM

NAME OF EMPLOYEE: _____

NAME OF FACILITY: _____

NAME OF INSTRUCTOR: _____

DATE OF COURSE: _____

WERE THE FOLLOWING TOPICS COVERED IN THIS TRAINING?

CFR 250 Sub-part O: Yes ___ No ___

Symbols & Equipment Identifications Codes: Yes ___ No ___

Safety Systems Goals & Objectives: Yes ___ No ___

Emergency Support Systems:

- ESD Yes ___ No ___
- TSE (Fusible Loop) Yes ___ No ___
- Containment Yes ___ No ___
- ASH (Gas Detectors) Yes ___ No ___
- SSSV Yes ___ No ___

Undesirable Events:

- Overpressure Yes ___ No ___
- Leak Yes ___ No ___
- Liquid Overflow Yes ___ No ___
- Gas Blowby Yes ___ No ___
- Underpressure Yes ___ No ___
- Excess Temperature Yes ___ No ___
- Direct Ignition Source Yes ___ No ___
- Excess Combustible Vapors in
the Firing Chamber Yes ___ No ___

Safety Analysis Tables (SAT) Yes ___ No ___

Safe Chart & System Design Introduction Yes ___ No ___

CFR 30, 250.300 Sub-part "C"
Pollution Prevention & Control Yes ___ No ___

CFR 30, 250.1000 Sub-part "J"
Pipelines Yes ___ No ___

CFR 30, 250.800 Sub-part "H"

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Production Safety Systems Yes ___ No ___

**CFR 30, 250.400 Sub-part “D”
Welding and Burning Practices
and Procedures** Yes ___ No ___

**CFR 30, 250.417 Sub-part “D”
Hydrogen Sulfide** Yes ___ No ___

**CFR 30, 250.500 Sub-part “E”
Well Completion Operations** Yes ___ No ___

**CFR 30, 250.600 Sub-part “F”
Well Workover Operations** Yes ___ No ___

**Did this course include Hands-On Testing
and records keeping?** Yes ___ No ___

Written Examination Yes ___ No ___

Was the instructor knowledgeable in all aspects of this training?

Comments _____

What is your overall opinion of the training you received?

Comments _____
