

IADC
WELL CONTROL
WORK GROUP

*“Subpart O Training – Hands On
Testing”*



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TODAY'S DISCUSSION

- Review MMS Hands-On Testing Requirements
- Explore Options For Moving Forward With an MMS Hands-On Well Control Testing Program
- Receive IADC Input on MMS Hands-On Testing Options

30 CFR 250.1507 – HOW WILL MMS MEASURE TRAINING RESULTS ?

(d) *Hands-on production safety, simulator, or live well testing.*

MMS or its authorized representative may conduct tests at either onshore or offshore locations. Tests will be designed to evaluate the competency of your employees or contract personnel in performing their assigned well control and production safety duties. You are responsible for the costs associated with this testing, excluding salary and travel costs for MMS personnel.

30 CFR 250.1509

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

If MMS or its authorized representative conducts, or requires you or your contractor to conduct hands-on, simulator, or other types of testing, you must:

30 CFR 250.1509 (Cont.)

- (a) Allow MMS or its authorized representative to administer or witness the testing;
- (b) Identify personnel by current position, years of experience in present position, years of total oil field experience, and employer's name (e.g., operator, contractor, or sub-contractor company name); and
- (c) Pay for all costs associated with the testing, excluding salary and travel costs for MMS personnel.

WHY IS MMS CONCERNED WITH HANDS-ON TESTING NOW ??

- Texas A&M University (TAMU) Well Control Conference, Houston, November, 2006
 - IADC Presentation
 - Company “Poaching”
 - Succession Planning
 - Baby Boomer Retirement Wave
 - Employee Shortage vs. Skill Shortage

WHY IS MMS CONCERNED WITH HANDS-ON TESTING NOW ??

- TAMU Well Control Conference, Houston, November, 2006
 - MMS Presentation
 - Increased Number of Subpart O Training INCs
 - G846, G851, G862, G842
 - Why are INCs Increasing?
 - Is MMS Getting Better at Implementing Subpart O ?
(*YES*)
 - Is Industry Getting Complacent with Their Plans ?
(*DON'T KNOW*)
 - Is Industry Doing Enough Training ? (*DON'T KNOW*)

OCS INCIDENT DATA

	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006
<u>Loss of Well Control</u> (Total)	5	7	5	9	10	6	5	4	4	1
Uncontrolled Flows	2	5	3	9	9	4	4	4	4	1
Diverter Events	3	2	2	0	1	2	1	0	0	0
<u>Collisions</u>	10	5	10	9	18	12	18	22	20	17
<u>Explosions</u>	10	3	5	2	6	3	6	4	2	9
<u>Fires</u>	125	90	75	103	85	93	104	72	78	130
<u>Injuries</u>	58	69	47	64	57	53	44	62	54	107
<u>Fatalities</u>	11	14	5	5	7	6	10	3	5	10

TAMU WELL CONTROL CONFERENCE - CONCLUSIONS

- Training Alliances
 - Operators, Contractors, Providers, Regulators
- Innovative Learning Techniques
- Mentoring
- Hands-On Testing
 - Where the Rubber Meets the Road

WELL CONTROL HANDS-ON TESTING OPTIONS

- Live Well Tests
- School Based Testing
 - Simulators
 - Computers
- 30 CFR 250.462 (d) Well Control Drill
- Others ??????

LIVE WELL TESTS

■ Advantages

- Locally Available – LSU ..
- Realistic
- Test Actual Crew

■ Disadvantages

- Costs - Paid by Lessee
- Tests Conducted During Employee Time Off
- Test Format & Exercise Needs to be Developed
- Onshore Test Only



SCHOOL BASED TESTING

■ Advantages

- Various Locations - Commercially Available
- Wide Acceptance - Format Already Developed
- Flexibility - Onshore or Offshore Testing

■ Disadvantages

- Tests Conducted During Employee Time Off - Onshore Only
- Drilling Crew Not Always Tested Together
- Not as Realistic as Other Techniques

30 CFR 250.462 (d)

WELL CONTROL DRILLS

■ Advantages

- Regulations Already In Place
- Field Implemented - Offshore
- Use of Actual Drilling Crew @ Work Site
- Already Being Implemented – Format Developed

■ Disadvantages

- Regulatory Pressure – All MMS Tests
- “Well” Needs to Cooperate

30 CFR 250.462

WELL CONTROL DRILLS

- Operator to Conduct Weekly Drill w/Each Crew
- Well Control Drill Plan
 - Well Basis
 - Crew Member Assignments
 - Times to Complete Drill
 - Post on Rig Floor
- Records
 - Record in Drillers Report
 - Time Ready to Close BOP/Diverter
 - Total Time to Complete Drill
- MMS Ordered Drill
 - During Inspection
 - Consult w/Operator

HANDS-ON TESTING THOUGHTS

- Is The Answer to the Hands-On Testing Question as Simple as Formalizing MMS 30 CFR 250.462 (d) Well Control Drill & Calling it a Hands-On Subpart O Test ?
- Subpart O Guidance Document – Appendix D; Well Control Drill Checklist
 - Already Available for Use by MMS
 - <http://www.mms.gov/lesseetraining/PDFs/GuidanceFeb2005DocPart1V211.pdf>

Appendix D
Well Control Drill Checklist

Employees name: _____ Date of Drill: _____

Employees Job/Title: _____ Employer: _____ Yrs. of Exp. in Curr. Job: _____

Type of Drill: Drilling Surface Well Completion/Workover Total Time for Entire Crew to Complete Drill: _____
 Drilling Subsea Well Servicing

Operating Company: _____ Contracting Company: _____

Location of Drill: Onshore: _____
 Offshore: Rig: _____ Area: _____ Block: _____ Lease: _____
 Announced: Unannounced:

MMS or MMS Authorized Representative(s) Conducting Drill: _____

Tasks performed during well control drills	Driller	Toolpusher	Co. Rep	Derrickhand/Asst Driller	Rough neck	Mud Engineer	Motorman	Cementer	Subsea Engineer	Service Personnel
Primary responsibility is kick detection and verification	✓									
Shut in the well	✓									
Notify supervisor	✓									
Organize crew for kill operation	✓									
Remains at drilling console to run rig and rig pump during kill operation	✓									
Responsible for rig and personnel		✓								
Verifies proper on and off tour crew deployment, notifies barge engineer or vessel captain of well control operations		✓								
May be responsible for operating the choke or to designate choke operator		✓								

NEXT STEP ??

- If MMS Decides to Move Forward with Hands-On Testing on a More Formalized Basis We Request Your Input & Ideas
- Areas of Interest
 - Testing Techniques
 - Testing Protocols
 - Testing Performance Criteria
 - Use of Data

SEMS UPDATE

- MMS ANPR
 - Published – 5/22/06
 - Comment Period Closed – 10/22/06
 - 3 Options – Full SEMS, Partial SEMS, Status Quo
 - Comments Received - 8
- Relationship Between SEMS and Subpart O is Currently Being Evaluated
- MMS Currently Preparing SEMS NPR

MMS UPDATE

- Industry Awards – Houston, April 17, 2006
- International Regulators Offshore Safety Conference – Miami, December 3 - 6, 2007
- API RP 65-1, SWF Cementing – Final Rule
- Additional Information @ www.mms.gov
- MMS 25th Anniversary;
 - 1/1982 – 1/2007

THANKS

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Discussion