

Appendix 1 – Feedback – Competency standard review

The following questions are provided to guide feedback without any intention to limit the raising of additional matters and options for improvement.

To provide your feedback email: gasSafe@rshq.qld.gov.au

Question	Response
Considering Table 1, what other changes in industry practice are relevant to worker competency?	<ul style="list-style-type: none"> • Landspray while Drilling applications. • Self-propelled workover units (rig package moved from site to site by the rig crew with Heavy Vehicle licences). • The use of SCUF tanks / flare tanks (there are multiple designs on the market). • Live well / underbalanced operations. • Introduction of flushby / minor workover units. These are small compact rigs utilised to replace rods and conduct pump flushes without the need for the full workover rig. • Rigless operations with wireline units and cranes. • Increase in automation (hands free) operations on workover and service rigs. • Alternative completions design with rod pumps, low rise packages, jet pumps, gauge cables, etc. • Plug and abandonment operations – both conventional and unconventional which are applicable to coal seam gas (CSG) operations.
What changes in industry practice need to be considered in revising the competency framework? Why are they important?	<ul style="list-style-type: none"> • Well servicing and intervention operations have expanded rapidly in the CSG industry over the last 15 years. Origin believes the competency framework should be revised to include modules for hydraulic fracturing, coiled tubing, wireline, flushby, snubbing, live well / underbalanced, rigless and flowback / well testing operations. • Origin believes that the Wellsite Permit To Work module should be made mandatory. This module is already considered a must have by the Queensland CSG industry.
Is there a need to broaden the scope of the competency framework to include all well servicing activities?	<ul style="list-style-type: none"> • Origin supports the proposal to expand the scope of the competency framework to include well servicing and intervention activities. Refer to Origin's response above for specific examples. • In addition, unconventional (e.g., underbalanced operations) and intervention operations also need a level of assurance at the appropriate level with standardisation on approach and associated expectations.
What options are there for the competency framework to better	<ul style="list-style-type: none"> • Origin believes that the competency framework would benefit from a tiered approach. The framework would

Question	Response
reflect contemporary industry practices?	provide a list of minimum mandatory modules, which would include Wellsite Permit To Work, safety, hazard identification and then provide specialised courses specific to the well operations and intervention activities.
What is the impact for operators in meeting competency requirements for workers on a drilling rig that also conducts well completion operations?	<ul style="list-style-type: none"> While Origin does not currently conduct drilling and completion operations with the same rig it is an option that is being investigated for future activities. To support operators and workers in meeting competency requirements, Origin believes that the framework needs to be developed holistically. It would allow the minimum mandatory modules completed by individuals to be recognised and would only require individuals to undertake the specialised modules they were missing e.g., those modules specific to drilling or completion operations.
Is the Competency Standard clear in setting out requirements for industry in relation to competencies needed by workers conducting drilling and well servicing operations? If not, how could these requirements be articulated more clearly?	<ul style="list-style-type: none"> Origin believes the competency standard is clear in setting out requirements for industry, however, believes there is an opportunity of the scope of the standard to be expanded.
Is the national RII framework fit for purpose?	<ul style="list-style-type: none"> No comment
The regulator considers supervisors must hold the RII qualifications they are supervising, are there alternative means of demonstrating a person is competent to supervise and instruct trainees?	<ul style="list-style-type: none"> No comment
Do the mandated competencies adequately reflect contemporary practice for ensuring competent workers? If not, what matters should be included in a revised competency framework?	<ul style="list-style-type: none"> No comment
For drilling and rig workers new to industry is there a need to allow for initial exposure to the work environment prior to enrolment into formalised training? How would this maintain or improve competency?	<ul style="list-style-type: none"> Origin believes that all drilling and rig workers should complete the minimum mandatory modules prior to attending site. The completion of modules specific to an individual's role may be completed after initial exposure to the work environment.
Should well control be a mandatory component of competency requirements for drilling and well servicing workers?	<ul style="list-style-type: none"> Yes, Origin believes that well control should be a mandatory competency requirement because it is one of the highest risks within our industry. This training is a standard requirement for most operating companies.

Question	Response
	<ul style="list-style-type: none"> • Additionally, the type of well control training should also be specific to the scope conducted i.e., personnel on a drilling rig must undertake the International Well Control Forum (IWCF) Surface Blow Out Preventers (BOP) Well Control training, whereas well servicing personnel might be better positioned to complete IWCF Well Intervention Pressure Control training. • Origin believes that the CSG industry would also benefit from further alignment in the type of well control training which is acceptable e.g., International Association of Drilling Contractors (IADC) or IWCF. For example, Origin requires OCR's to complete IWCF training, however, either IADC or IWCF are accepted for contractor personnel training.
<p>Should OCR's have specific competency requirements? If yes, what options should be considered?</p>	<ul style="list-style-type: none"> • Origin does not believe that specific competency requirements for OCR's are required. OCR's hold the position of Site Safety Manager (SSM) for a well site and as such already have training, competency, and experience requirements they must meet to hold this position. • Origin would be keen to workshop any proposal for the implementation of OCR specific competency requirements with industry and the regulator.
<p>For drilling and well servicing operators that employ workers with international training and work experience, has there been any difficulty for these workers in receiving recognition of prior learning when seeking attainment of core electives and units under the RII package?</p>	<ul style="list-style-type: none"> • International OCRs were required to obtain IWCF well control training because it was considered a higher standard in the industry that their IADC well control certificates. • Origin supports the recognition of the prior learning and believes that this requirement should be incorporated into any changes in the competency framework. • If the framework is expanded to include well servicing and intervention operations, then prior learning should be recognised to support international and returning workers.
<p>For RII training professionals (RTOs and certified assessors):</p> <ul style="list-style-type: none"> • Are you able to provide a summary of requests received and approvals granted for recognition of prior learning related to the RII package for drilling and well servicing? • What are the reasons given when recognition of prior learning has not been given? 	<ul style="list-style-type: none"> • No comment
<p>What are your suggestions for an optimum, best practice competency framework?</p>	<ul style="list-style-type: none"> • No comment