

25 August 2023

RSHQ Policy
Resources Safety & Health Queensland
via email: RSHPolicy@dnrme.qld.gov.au

Dear Sir/Madam,

RE: Consultation on Competency requirements for Queensland's for drilling and well servicing workers discussion paper – Petroleum and Gas Inspectorate 21 July 2023

I am writing on behalf of Arrow Energy to provide feedback on the Competency requirements for Queensland's drilling and well servicing workers discussion paper.

Arrow has reviewed the discussion paper and provided responses based on RSHQ's questions in the table below.

Arrow thanks RSHQ for the opportunity to provide input.

Yours sincerely

[Redacted signature]

[Redacted contact information]

Table 1 Arrow Responses to Drilling and Well Servicing consultation questions.

Question	Response
1. Considering Table 1, what other changes in industry practice are relevant to worker competency?	<p>As the stock of active wells has increased over time, Operations and Maintenance activities on petroleum wells have increased.</p> <p>Over time we are operating on increasingly depleted reservoirs – which have distinct characteristics in comparison with virgin fields (e.g., increased free gas).</p> <p>Increase in the number of deviated producing assets.</p>
2. What changes in industry practice need to be considered in revising the competency framework? Why are they important?	See response for Question 1
3. Is there a need to broaden the scope of the competency framework to include all well servicing activities?	<p>Yes.</p> <p>The competency standard for drilling and well servicing are clear for rig related positions.</p> <p>The following activities are not covered under the current standards: Coil Tubing Units (CTU), Onsite Company Representatives (OCR), Well field operators.</p> <p>Other aspects that are not considered are hydraulic fracturing (frac spreads), stand-alone services such as wire line, cementing and gauge runs.</p> <p>Change reference to water bores to allow for increased flexibility if minimal risk or exposure to CSG.</p>
4. What options are there for the competency framework to better reflect contemporary industry practices?	<p>Cert III in Process Plant Operations for example has a unit or element on Undertaking Well Management (PMAOPS334) which includes monitoring well systems, production status and reports, abnormal situations management, gas flow, operating parameters, emergency shutdown, well services handover and intervention, etc.</p> <p>There are many elective units of competencies that are specific to Coal Seam Gas i.e., PMAOPS233- Monitor Wells and gathering systems; PMAOPS318- conduct artificial lifts; PMAOPS339- Operate and troubleshoot wells and gathering systems.</p>
5. What is the impact for operators in meeting competency requirements for workers on a drilling rig that also conducts well completion operations?	Arrow does not believe that there is a significant impact on operators in meeting competency requirements for drilling rigs that also conduct well completion. There is significant overlap in the units of competency.
6. 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?	<p>It is clear for drilling.</p> <p>It is not clear in terms of operating and maintaining CSG wells and bores. It needs to clearly define the activities in each phase or over the lifecycle of a well.</p>

Question	Response
7. Is the national RII framework fit for purpose?	<p>It provides a grounding in the underlying principals but not in the practical operation of the plant – which varies between rigs.</p> <p>If applied to Operations and maintenance in CSG, Cert II in Well Servicing as example does not have units of competencies and elements that address well maintenance or CSG specific activities.</p>
8. 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?	<p>Provide clarity around “A competent person has acquired through training, qualification or experience the knowledge and skills to carry out the task.”</p> <p>Some contractors have taken the position in the past that by demonstrating supervisors where they have held the lower positions and retained knowledge by other means that the lower RII are not required to provide direct supervision. Which contradicts the following statement “The Competency Standard does not provide for achieving competence through a training program other than RII implemented by a certified RTO (Registered Training Organisation) and assessed against this program by either an RTO or certified assessor.”</p>
9. Do the mandated competencies adequately reflect contemporary practice for ensuring competent workers? If not, what matters should be included in a revised competency framework?	<p>It provides a grounding in the underlying principals but not in the practical operation of the plant – which varies between rigs.</p> <p>There is no mention Verification of Competency (VOC) on the specific equipment employed in the current framework.</p>
10. 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?	Yes
11. Should well control be a mandatory component of competency requirements for drilling and well servicing workers?	<p>Yes.</p> <p>Possible alignment with IOGP 476.</p>
12. Should OCR's have specific competency requirements? If yes, what options should be considered?	Yes – it would need to be put to a suitable working group to determine the competency requirements.
13. 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	Arrow does not have a position on this question

Question	Response
<p>14. 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? 	<p>Arrow does not have a position on this question</p>
<p>15. What are your suggestions for an optimum, best practice competency framework?</p>	<p>Produce a holistic training matrix for drilling and well servicing, that incorporates all relevant stages of a well life cycle.</p> <p>Clearly defining each stage and associated activities will assist in identifying skills and competencies required to execute every activity.</p>