

SANTOS FEEDBACK EXTRACTED FROM EMAIL TO BILL DATE 30-08-2023

From: Firth, Kylie (Kylie) <Kylie.Firth@santos.com>

Sent: Wednesday, August 30, 2023 5:12 PM

To: Bill Date

Cc: Watt, Glenn (Glenn); Dedigama, Thivanka (Thivanka); Turnbull, Simon (Simon); O'Connell, Mike (Mike); Fernandez, Javier (Yub)

Subject: Competency Standard Review Response to RSHQ

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Be careful before clicking any link or attachment.

Good afternoon Bill

Thank you for the opportunity to provide comments on the Competency Standard Review.

Main points of discussion:

- How do we ensure recognition of prior experience for those personal who have reached assistant driller, driller or rig manager prior to certification requirements.
- How do we leverage off/collaborate with the industry body of Safer Together that represents majority of contractors and operators.

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?	N/A

<p>What changes in industry practice need to be considered in revising the competency framework? Why are they important?</p>	<p>Chain of Responsibility Training, specifically related to oilfield truck movements including moving rigs and transporting fluids. High risk activity that also exposes the public on roadways and NHVL may not adequately cover the differences to traditional freight hauling.</p>
<p>Is there a need to broaden the scope of the competency framework to include all well servicing activities?</p>	<p>Believe there should be minimum competencies for coil tubing, snubbing, wireline and fracture stimulation activities. Majority have same exposure to risks like well control, pressure, dropped objects etc... so should have some minimum competency required.</p>
<p>What options are there for the competency framework to better reflect contemporary industry practices?</p>	<p>Based on position and risk exposure so it's more fit for purpose. Could map to main hazards with verification of competency in place or alongside certification. IRP 7 In Alberta as reference below (10% certification + 20% mentorship + 70% experience) https://www.energysafetycanada.com/Attachments/DownloadResource?attachmentGuid=d184daa7-f2f8-4a54-8397-005a1320854d&open=True https://www.energysafetycanada.com/getattachment/da406f34-8265-4eab-a24d-caef2b5763e7/IRP7_Compentency_Matrix_2019-04-16.xlsx?lang=en-US</p>

Question	Response
<p>What is the impact for operators in meeting competency requirements for workers on a drilling rig that also conducts well completion operations?</p>	<p>Have to hold both competencies and difficult to backfill quickly if people quit or are ill, should work to combine the two competencies with well control cert (Surface Stack or Well Intervention) being really the only difference in the roles.</p>
<p>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>	<p>The Alert issued 15 May, provided a clearer definition on "supervision" on enrolled personnel which clears up a lot of the confusion.</p> <p>The Alert was also prescriptive on having held lower certificates for what was being supervised, however we don't necessarily agree with this approach. Recognition of prior experience for personnel who have reached AD/Driller/Rig Managers prior to certification requirements.</p>

<p>Is the national RII framework fit for purpose?</p>	<p>Needs to be updated to reflect current work scopes. Should include well interventions.</p>
<p>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>	<p>Recognized prior learning/experience should be applicable especially for personnel in higher positions that worked through the lower ranks prior to RII being in place.</p>
<p>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>	<p>Verification of competency is probably more important than certification but more difficult to provide evidence for.</p>
Question	Response
<p>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?</p>	<p>Yes as many leave after first couple of hitches. It would be cost and time prohibitive to have formalised training for all entrants but needs to be ring fenced so initial exposure is only low risk tasks with appropriate supervision (i.e. lease hands or equivalent on other operations).</p> <p>Industry Safety Induction should remain mandatory for personnel new to the industry.</p>
<p>Should well control be a mandatory component of competency requirements for drilling and well servicing workers?</p>	<p>Yes for AD/Driller (Level 3) and RM/TP (Level 4) only.</p> <p>Surface for Drilling/ Well Intervention for everything else (IWCF or IADC).</p> <p>Derrickman (Level 2).</p>

<p>Should OCR's have specific competency requirements? If yes, what options should be considered?</p>	<p>Needs to be fit for purpose for task they're SSM for and mapped to their Position Description but all should have the below at a minimum:</p> <ul style="list-style-type: none"> - Surface/ Well Intervention - Level 4 Supervisor (IWCF/ IADC) - WPTW Rev 3 (OCR) - Lockscrew Awareness Training - Chain of Responsibility (Min Level 1) - ER training – On Scene Commander - First Aid <p>Worth exploring a fit for purpose Supervisor Leadership Course that covers:</p> <ul style="list-style-type: none"> - Supervisor leadership styles and communication skills - Health and safety systems - Legislation (P&G and general WHS) - Supervisor responsibilities (link to SSM responsibilities and means of discharging obligations) <p>Example course: Supervisor Leadership for Health and Safety in the Workplace</p> <p>Cert IV in Work Health and Safety is not suitable for OCRs.</p> <p>Opportunity to engage with Safer Together/RHSQ to develop a customised Supervisor Leadership Training for OCR's.</p>
<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>	<p>N/A</p>

<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? 	<p>N/A</p>
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Question	Response
<p>What are your suggestions for an optimum, best practice competency framework?</p>	<p>A competency framework that incorporates:</p> <ul style="list-style-type: none"> - Certification 10% - On the job mentoring (20%) building experience 70%

Kind regards

Kylie Firth
 Snr Incident, Emergency Response and Compliance Adviser



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