



30 August 2023

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To Whom it May Concern,

**RE: Feedback – Competency Standard Review**

Senex appreciate the opportunity to provide feedback on the Competency standard for petroleum and gas well drilling and well servicing.

We have reviewed the discussion paper that outlines the existing issues within the framework and have provided a response for consideration regarding Operating Company Representatives (OCRs) and Well Control in the Attachment.

We would also welcome RSHQ hosting an industry workshop with the other tenure holder operators to provide support and input to help gain further alignment.

Yours sincerely,

[Redacted signature block]

**Senex Energy Pty Ltd**

Attachment – Responses to Discussion Paper Questions that relate to Tenure Holder Operator / OCR

Question	Response
<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>This question is not applicable to Operating Company Representatives (OCRs).</p> <p>OCR's role involves ensuring the well program is executed within the parameters of the program on behalf of the tenure holder operator. Whilst an OCR position is appointed as a Site Safety Manager, they are not responsible for specifically supervising how work is managed and undertaken by other contractors / operators of operating plant, including but not limited to:</p> <ul style="list-style-type: none"> <li>• drilling and /or well servicing operations;</li> <li>• wireline operations;</li> <li>• cementing operations;</li> <li>• hydraulic fracturing, or</li> <li>• coil tubing operations.</li> </ul>
<p>Should well control be a mandatory component of competency requirements for drilling and well servicing workers?</p>	<p>Yes. Well control training is considered by industry as minimum competency requirement for the prevention of an uncontrolled release of hydrocarbons which may lead to a well control event.</p> <p>The International Association of Oil and Gas Producers have released the report "Recommendations for enhancements to well control training, examination and certification" and "Well Control Training – Levels Guidance Chart" that provides guidance on the role specific well control training levels required for different wellsite positions. These documents provide reference to Company Man which would be the equivalent role to OCR.</p>

Question	Response
<p>Should OCR's have specific competency requirements? If yes, what options should be considered?</p>	<p>Operating Company Representatives (OCRs) role involves ensuring the well program is executed within the parameters on behalf of the tenure holder operator. Whilst an OCR position is appointed as a Site Safety Manager, they are not responsible for specifically supervising how work is managed and undertaken by other contractors / operators of operating plant, including but not limited to:</p> <ul style="list-style-type: none"> <li>• drilling and /or well servicing operations;</li> <li>• wireline operations;</li> <li>• cementing operations;</li> <li>• hydraulic fracturing, or</li> <li>• coil tubing operations.</li> </ul> <p>OCRs do support the tenure holder operator with managing its <b>contractors and their interactions</b> with other contractors and / or operating plant (as per section 675(1)(f)). Other responsibilities where OCRs would require a level of competency include:</p> <ul style="list-style-type: none"> <li>• understanding the tenure holder operator <b>Safety Management System (SMS)</b> and how it is applied (as per section 674(1)(a));</li> <li>• <b>WHS legal obligations</b> including Site Safety Manager (as per 692);</li> <li>• <b>Monitoring contractor performance</b>, however not directing how work is managed regarding contractor's people, systems and equipment / operating plant;</li> <li>• <b>Incident response</b> regarding make safe arrangements, reporting, and understanding legal requirements for prescribed incident requirements and preservation of the scene;</li> <li>• <b>Emergency preparedness and response</b>, and</li> <li>• <b>Well control</b> (please see above).</li> </ul>

Level	Training is on responsibilities for	Action may occur relative to Well Control Assurance <sup>a</sup>	What training this person needs	Learning Outcomes	Certificate for	Repeat Frequency	Learning Method	Formal Assessment	Guide to Typical Roles (Titles can vary between different companies, locations or facilities). The Level may need to be adjusted depending on responsibilities. This list is not exhaustive: the principle is that operator and employer review what training is required to manage the risks.					
1	All personnel contributing to the well project	For individuals who need an awareness of what well control is and those who could perform an action that might indirectly impact Well Control Assurance (WCA)	Awareness of the processes and terminology of well lifecycle in order to develop adequate knowledge to provide the required support	Have relevant awareness knowledge of the Key Topics to provide effective support	A general overview of the lifecycle of a well with emphasis on how everyone's role can affect well control	None (No repeat)	Online modules or classroom. Include self-assessment questionnaires.	None	<ol style="list-style-type: none"> <li>The following non-well-site office-based staff in an oil and gas operating company drilling or well operations department: <ol style="list-style-type: none"> <li>Logistics coordination personnel and logistics supervisors</li> <li>Subsurface staff/geologists involved with well planning and well scheduling personnel</li> </ol> </li> <li>Offshore installation managers (OIMs) that do not have a primary function for drilling and/or well intervention (i.e., production OIMs)</li> <li>Roustabouts, deck crew, and platform and site location crane operators</li> <li>Rig move captains or rig move offshore installation managers (OIMs)</li> <li>Oil and gas installation supply and support vessel watch officers and captains</li> <li>Other non-critical well-site personnel responsible for downhole and surface well equipment repair, inspection and operations such as: <ol style="list-style-type: none"> <li>Remotely operated vehicle (ROV) personnel (non-supervisory)</li> <li>Other well-site non-supervisory and non-critical drilling or intervention personnel</li> <li>Tubular and rig inspection personnel</li> </ol> </li> <li>Maintenance personnel not working on pressure control equipment</li> </ol>					
2	Operations team support personnel	Well-site based position whose action or inaction that could directly influence WCA <sup>aii</sup>	Skills to act under guidance	Have knowledge and skills to effectively act under guidance (monitor, observe, detect, report)	Attention to Well Control Prevention and Response for the appropriate equipment scenarios (surface / subsea): <ol style="list-style-type: none"> <li>Drilling</li> <li>Intervention</li> <li>Support services</li> </ol>	Every 5 years	Online modules or classroom. Include self-assessment questionnaires.	Examination	<table border="0"> <tr> <td> <ol style="list-style-type: none"> <li><b>Drilling, Workover and Completions</b> <ol style="list-style-type: none"> <li>Well-site operations engineer</li> <li>Well-site and office-based operations geologist</li> <li>Roughneck</li> <li>Derrick-man</li> <li>Drilling contractor maintenance personnel working with pressure control equipment (e.g., maintenance supervisor, rig mechanic)</li> <li>BOP equipment installation, re-work, repair or maintenance personnel</li> </ol> </li> </ol> </td> <td> <ol style="list-style-type: none"> <li><b>Intervention</b> <ol style="list-style-type: none"> <li>Well-site operations engineer</li> <li>Intervention services crew members</li> <li>Well-site based wireline or slick-line crew members</li> <li>Coiled tubing services crew members</li> <li>Snubbing crew members</li> <li>Well test crew members</li> <li>Pumping and stimulation crew members</li> <li>Well testing crew members</li> </ol> </li> </ol> </td> </tr> <tr> <td colspan="2"> <ol style="list-style-type: none"> <li><b>Support Services <sup>b</sup></b> <ol style="list-style-type: none"> <li>Dynamic position operator</li> <li>Well-site ROV supervisor and crew</li> <li>Well-site drilling fluids, mud and completion fluids engineer</li> <li>Well-site directional driller</li> <li>Fishing engineer or fishing tool operator</li> <li>Mud logger or well-site drilling data engineer</li> <li>Well-site casing crew supervisors</li> <li>Well-site cementing operator</li> <li>Wellhead engineer</li> <li>Subsea BOP engineer</li> </ol> </li> </ol> </td> <td> <ol style="list-style-type: none"> <li>MPD / UBD well-site service personnel (non-supervisory)</li> <li>Casing running personnel (non-supervisory)</li> <li>Directional surveying / MWD / LWD personnel</li> <li>Production staff / supervisors</li> <li>Crane operators suspending intervention equipment</li> <li>Wellhead maintenance crew</li> <li>Well-site oilfield equipment repair personnel</li> <li>Electric supervisor and crew working with EE related to WC</li> <li>Subsea wellhead / Xmas tree engineer</li> </ol> </td> </tr> </table>	<ol style="list-style-type: none"> <li><b>Drilling, Workover and Completions</b> <ol style="list-style-type: none"> <li>Well-site operations engineer</li> <li>Well-site and office-based operations geologist</li> <li>Roughneck</li> <li>Derrick-man</li> <li>Drilling contractor maintenance personnel working with pressure control equipment (e.g., maintenance supervisor, rig mechanic)</li> <li>BOP equipment installation, re-work, repair or maintenance personnel</li> </ol> </li> </ol>	<ol style="list-style-type: none"> <li><b>Intervention</b> <ol style="list-style-type: none"> <li>Well-site operations engineer</li> <li>Intervention services crew members</li> <li>Well-site based wireline or slick-line crew members</li> <li>Coiled tubing services crew members</li> <li>Snubbing crew members</li> <li>Well test crew members</li> <li>Pumping and stimulation crew members</li> <li>Well testing crew members</li> </ol> </li> </ol>	<ol style="list-style-type: none"> <li><b>Support Services <sup>b</sup></b> <ol style="list-style-type: none"> <li>Dynamic position operator</li> <li>Well-site ROV supervisor and crew</li> <li>Well-site drilling fluids, mud and completion fluids engineer</li> <li>Well-site directional driller</li> <li>Fishing engineer or fishing tool operator</li> <li>Mud logger or well-site drilling data engineer</li> <li>Well-site casing crew supervisors</li> <li>Well-site cementing operator</li> <li>Wellhead engineer</li> <li>Subsea BOP engineer</li> </ol> </li> </ol>		<ol style="list-style-type: none"> <li>MPD / UBD well-site service personnel (non-supervisory)</li> <li>Casing running personnel (non-supervisory)</li> <li>Directional surveying / MWD / LWD personnel</li> <li>Production staff / supervisors</li> <li>Crane operators suspending intervention equipment</li> <li>Wellhead maintenance crew</li> <li>Well-site oilfield equipment repair personnel</li> <li>Electric supervisor and crew working with EE related to WC</li> <li>Subsea wellhead / Xmas tree engineer</li> </ol>
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3 and 3E	Equipment operator	Has to perform an action to ensure WCA <sup>aii</sup> or to respond to well control incidents WCA <sup>aiii</sup>	Correct actions to take	Be able to perform their role effectively, in particular by identifying anomalies and performing the first actions independently, and recognize that they are empowered to do so. Proactively communicate with all personnel who provide support to maintaining well control (e.g., Level 2 personnel). <i>The Level 3E (Enhanced) is intended to deepen knowledge and can be attempted after having passed Level 3.</i>	Attention to Well Control Prevention and Response for the appropriate equipment scenarios (surface / subsea): <ol style="list-style-type: none"> <li>Drilling</li> <li>Intervention</li> <li>Support services</li> </ol>	Every 2 years  Level 3E can be attempted 2 years after Level 3 has been successfully passed	Online modules or classroom. Include self-assessment questionnaires.	Examination and Practical <sup>d</sup>	<table border="0"> <tr> <td> <ol style="list-style-type: none"> <li><b>Drilling, Workover and Completions</b> <ol style="list-style-type: none"> <li>Driller</li> <li>Assistant driller</li> </ol> </li> </ol> </td> <td> <ol style="list-style-type: none"> <li><b>Intervention</b> <ol style="list-style-type: none"> <li>Wireline, E-line, Slick-line operator</li> <li>N2 operator</li> <li>Wellhead / tree installation engineer</li> <li>Hydraulic workover (snubbing) operator</li> <li>Coiled tubing operator and equivalent positions in other well-servicing or intervention operations</li> <li>Well Test Operator</li> </ol> </li> </ol> </td> </tr> <tr> <td colspan="2"> <ol style="list-style-type: none"> <li><b>Support Services <sup>b</sup></b> <ol style="list-style-type: none"> <li>Well testing crew</li> <li>MPD / UBD well-site service supervisor</li> </ol> </li> </ol> </td> <td></td> </tr> </table>	<ol style="list-style-type: none"> <li><b>Drilling, Workover and Completions</b> <ol style="list-style-type: none"> <li>Driller</li> <li>Assistant driller</li> </ol> </li> </ol>	<ol style="list-style-type: none"> <li><b>Intervention</b> <ol style="list-style-type: none"> <li>Wireline, E-line, Slick-line operator</li> <li>N2 operator</li> <li>Wellhead / tree installation engineer</li> <li>Hydraulic workover (snubbing) operator</li> <li>Coiled tubing operator and equivalent positions in other well-servicing or intervention operations</li> <li>Well Test Operator</li> </ol> </li> </ol>	<ol style="list-style-type: none"> <li><b>Support Services <sup>b</sup></b> <ol style="list-style-type: none"> <li>Well testing crew</li> <li>MPD / UBD well-site service supervisor</li> </ol> </li> </ol>		
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4 and 4E	Supervisor	Specifies and has oversight that correct actions are carried out	Skills to anticipate, plan, oversee and verify	Be able to establish consistent practices to assure continued primary well control and well integrity. When anomalous situations occur, or conditions escalate, they will be able to analyse the situation, develop plans to minimize the impact and recover the situation to the norm. <i>The Level 4E (Enhanced) is intended to deepen knowledge and can be attempted after having passed Level 4.</i>	Attention to Well Control Planning, Prevention and Response for the appropriate equipment scenarios (surface / subsea): <ol style="list-style-type: none"> <li>Drilling</li> <li>Intervention</li> <li>Support services</li> </ol>	Every 2 years  Level 4E can be attempted 2 years after Level 4 has been successfully passed	Facilitated virtual/online or classroom-based using instruction, simulation, desktop exercises, presentations and discussions, possibly complemented by online prework for knowledge content and practice. <sup>e</sup>	Examination and Practical <sup>d</sup>	<table border="0"> <tr> <td> <ol style="list-style-type: none"> <li><b>Drilling, Workover and Completions</b> <ol style="list-style-type: none"> <li>Drilling, workover and completions well-site supervisor, superintendent or company man (day and night)</li> <li>Tool pusher</li> <li>Drilling contractor rig manager</li> <li>Office-based operational staff (e.g., senior well engineer, operational well engineer)</li> </ol> </li> </ol> </td> <td> <ol style="list-style-type: none"> <li><b>Intervention</b> <ol style="list-style-type: none"> <li>Completion / workover / intervention supervisor or superintendent</li> <li>Well-site completions / workover supervisor</li> <li>Supervisors or crew chiefs for special service operations such as wireline, slick-line and coiled tubing operations, which provide specific well control equipment for these activities</li> <li>Office-based operational staff (e.g., senior completions / well interventions</li> <li>Engineer, operational completions / well intervention engineer)</li> <li>Well test supervisor</li> </ol> </li> </ol> </td> </tr> <tr> <td colspan="2"> <ol style="list-style-type: none"> <li><b>Support Services <sup>b</sup></b> <ol style="list-style-type: none"> <li>Offshore installation manager (OIM) for offshore units with a primary function for drilling or well intervention</li> <li>Well-site personnel supervising managed pressure drilling (MPD) operations or under-balance drilling (UBD) services</li> <li>Hydraulic workover (snubbing) supervisor</li> </ol> </li> </ol> </td> <td></td> </tr> </table>	<ol style="list-style-type: none"> <li><b>Drilling, Workover and Completions</b> <ol style="list-style-type: none"> <li>Drilling, workover and completions well-site supervisor, superintendent or company man (day and night)</li> <li>Tool pusher</li> <li>Drilling contractor rig manager</li> <li>Office-based operational staff (e.g., senior well engineer, operational well engineer)</li> </ol> </li> </ol>	<ol style="list-style-type: none"> <li><b>Intervention</b> <ol style="list-style-type: none"> <li>Completion / workover / intervention supervisor or superintendent</li> <li>Well-site completions / workover supervisor</li> <li>Supervisors or crew chiefs for special service operations such as wireline, slick-line and coiled tubing operations, which provide specific well control equipment for these activities</li> <li>Office-based operational staff (e.g., senior completions / well interventions</li> <li>Engineer, operational completions / well intervention engineer)</li> <li>Well test supervisor</li> </ol> </li> </ol>	<ol style="list-style-type: none"> <li><b>Support Services <sup>b</sup></b> <ol style="list-style-type: none"> <li>Offshore installation manager (OIM) for offshore units with a primary function for drilling or well intervention</li> <li>Well-site personnel supervising managed pressure drilling (MPD) operations or under-balance drilling (UBD) services</li> <li>Hydraulic workover (snubbing) supervisor</li> </ol> </li> </ol>		
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	Well control in design and lifecycle management <sup>a</sup>	Deliver the correct design and develop the normal operating envelope. Identify actions with the agreed design envelope and manage risk.	Skills to design the well and well activities, including subsurface/geological knowledge. Skill to identify and to specify actions to be taken when stepping outside of the normal operating envelope. Ability to assess well integrity and associated risks.	Have discipline-specific skills and subsurface/geological/production knowledge to be capable of planning and performing safe well design and/or intervention operations. Be able to evaluate technically on deviations to the well operations plan and advise accordingly. Be able to support operational teams when assessing critical well situations.	One discipline-specific training course or programme for all operations, environments and rig types	None (Continuous learning refreshers recommended) <sup>f</sup>	Facilitated classroom or equivalent facilitated distance learning, self-study using simulation, desktop exercises, presentations and discussions, possibly complemented by online prework for knowledge content and practice.  Modular training programmes over a longer time period (maximum 2 years) as part of a career development programme is encouraged.	Industry Examination, or auditable alternatives as deployed in some company programmes.	<table border="0"> <tr> <td> <ol style="list-style-type: none"> <li>Drilling engineer / senior drilling engineer</li> <li>Completion engineers / senior completion engineer</li> <li>Petroleum engineers / senior petroleum engineers</li> <li>Well service engineer / senior well service engineer</li> <li>Intervention engineer / senior intervention engineer</li> <li>Drilling / intervention superintendent (if involved with well design)</li> </ol> </td> <td> <ol style="list-style-type: none"> <li>Drilling manager (up to first line drilling management)</li> <li>Drilling project managers (up to first line drilling management)</li> <li>Well operations managers</li> <li>Well services managers</li> <li>Office-based design personnel</li> <li>Senior wells personnel, e.g., team leader and general manager wells</li> </ol> </td> </tr> </table>	<ol style="list-style-type: none"> <li>Drilling engineer / senior drilling engineer</li> <li>Completion engineers / senior completion engineer</li> <li>Petroleum engineers / senior petroleum engineers</li> <li>Well service engineer / senior well service engineer</li> <li>Intervention engineer / senior intervention engineer</li> <li>Drilling / intervention superintendent (if involved with well design)</li> </ol>	<ol style="list-style-type: none"> <li>Drilling manager (up to first line drilling management)</li> <li>Drilling project managers (up to first line drilling management)</li> <li>Well operations managers</li> <li>Well services managers</li> <li>Office-based design personnel</li> <li>Senior wells personnel, e.g., team leader and general manager wells</li> </ol>			
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Chart excludes Well Integrity Assurance (WIA) during production use of the well.

<sup>a</sup> Well Control Assurance. WCA (i): The assurance that primary well control is maintained. WCA (ii): When this is not the case that the situation is properly contained and the status of the well returned safely to normality.

<sup>b</sup> Well Support Service providers (or their training partners) are to identify and deliver appropriate well control training to their staff requisite for services provided.

<sup>c</sup> Could be a fully auditable alternative. The Classroom is a Standard. The full capability should be demonstrated to meet or exceed the learning environment of the classroom.

<sup>d</sup> For Drilling (and for D/WO/C): Written examination and simulator assessment. For Well Intervention: Written examination and simulator assessment or approved alternative (e.g. scenario-based paper exercise).

<sup>e</sup> Approving Authority is the individual providing technical oversight for the design and for deviations.

<sup>f</sup> Refreshers recommended because technologies, practices, designs, standards, etc. change with time.