

## **CONTRACTOR SAFETY AND ENVIRONMENTAL REQUIREMENTS**

### **A. Purpose and Scope**

- A.1 The purpose and scope of these requirements is to establish safety and environmental requirements for contractors to be able to work on Fieldwood Energy owned or managed properties.

The objectives of these requirements are to ensure that all contractors and subcontractors working on Fieldwood Energy's facilities/work sites have programs in place to comply with the Bureau of Safety and Environmental Enforcement (BSEE) Safety and Environmental Management Systems (SEMS) requirements or other applicable safety and environmental regulations, laws, rules and standards of agencies having jurisdiction at locations, their employees are adequately skilled and knowledgeable to safely perform their assigned job task functions, to ensure that safety and environmental policies have been established and to ensure that contractor's management is committed to safety.

### **B. Written Safety and Environmental Programs**

- B.1 Contractors shall develop and implement written safety and environmental management programs which must include but not be limited to the following:

- Management Commitment
- Written Safe Work Practices specific for work to be performed in compliance with applicable OSHA, BSEE, U.S. Coast Guard, EPA and other applicable government agencies.
- Training Program to include an employee Skills and Knowledge Verification process
- Drug and Alcohol Prevention Program (DISA)
- Hazard Recognition Program to include JSA (Job Safety Analysis)
- Stop Work Authority Program
- Incident Reporting and Investigation Program
- Operating Procedures for Equipment
- Mechanical Integrity Program
- Management of Change (MOC)

### **C. Training Requirements**

- C.1 Contractor's personnel (and those of all subcontractors) shall be skilled and knowledgeable for the tasks or activities to be accomplished. This includes being in compliance with appropriate safety and environmental training codes, standards, laws and regulations as required by governmental agencies having jurisdiction at the work site (e.g., BSEE, USCG, EPA, DOT, OSHA) as well as Fieldwood Energy's Contractor Training Requirements.
- C.2 A Training Matrix has been established to identify minimal training requirements for contractor personnel performing work on Fieldwood Energy properties. Contractors should refer to Fieldwood Energy's SEMS portal for the latest version of the Training Matrix and must verify the training requirements are met for the appropriate job titles (functions).

## **D. Safety and Environmental Management Systems (SEMS) - Contractor Requirements**

- D.1 Fieldwood Energy has established very specific contractor safety and environmental management requirements in order to provide for the safety of all personnel and to comply with current safety and environmental regulations. Below are specific requirements as part of the SEMS contractor agreement/bridging process. A detailed description and compliance guide can be obtained from the Fieldwood Energy SEMS portal or by calling Fieldwood's EH&S department.
- D.2 Requirements
- D.2.1 Contractors performing activities on-site offshore must participate in the ISNetworld Review and Verification, as well as the Training Qualification (TQ) processes;
- D.2.2 Contractor must review Fieldwood Energy's Safety and Environmental Management System (SEMS), related SEMS requirements, Safe Work Practices and must perform all contractual obligations in accordance with such Fieldwood Energy programs;
- D.2.3 The Contractor must communicate identified hazards to all affected personnel (including Contractor, Operator and 3rd Party personnel) prior to performing oil, gas and sulphur operations for Fieldwood Energy;
- D.2.4 The Contractor must comply with all applicable safety and environmental regulations, laws, rules and standards of agencies having jurisdiction at locations where work is conducted for the Operator;
- D.2.5 The Contractor must verify and provide documentation upon request that its personnel and any subcontractors performing work for Fieldwood Energy have the skills and knowledge to perform their assigned duties in a safe and environmentally sound manner, has documented such, and that the information contained therein is accurate, timely and reflective of all appropriate safety and environmental training codes, standards, laws and regulations as required by governmental or regulatory agencies having jurisdiction at the work site.(e.g., BOEM, BSEE, USCG, EPA, DOT, OSHA) ;
- D.2.6 The Contractor must have written safe work practices that help minimize the risk to personnel and the environment for all work conducted for Fieldwood Energy, and all activities performed by the Contractor will be conducted in accordance with those safe work practices;
- D.2.7 The Contractor must require all personnel performing work for Fieldwood Energy to undergo periodic retraining and skill assessments, in accordance with Fieldwood Energy's Training Requirements for On-Site Contractors (Training Matrix), to ensure adequate retention of the skills and knowledge required to perform their assigned duties;
- D.2.8 The Contractor must obtain and/or develop written operating procedures to ensure the safe operation of critical equipment that is operated and maintained by the Contractor whether or not that equipment is owned by the Contractor or any Third Party. Critical equipment, per Appendix D of API RP 75, is defined as: "Equipment and other systems determined to be essential in preventing the occurrence of or mitigating the consequences of an uncontrolled release." Such equipment may include vessels, machinery (compressors, mud pumps, fire pumps, etc.), piping, blowout preventers, wellheads and related valving, flares, wireline equipment, coil tubing

equipment, fluid management equipment, safety systems, alarms, interlocks, fire protection equipment and other monitoring, control and response systems.

- D.2.9 The Contractor must periodically review their written operating procedures used to operate critical equipment to ensure they reflect actual operating conditions;
- D.2.10 The Contractor must develop and implement a written mechanical integrity program for any critical equipment that will be maintained and operated by the Contractor. Such a program must include, as applicable:
- The design, fabrication, procurement, installation, testing, calibration and inspection criteria and limits;
  - The basis for maintenance (manufacturer's recommendation, industry standards, etc.
  - A quality assurance program to ensure the mechanical integrity and safe operation of the Equipment;
- D.2.11 All documents required per 30 CFR 250, Subpart S and API RP 75 will be maintained in an orderly manner, will be readily identifiable, retrievable, and legible, and will be available for review on request by Fieldwood Energy or appropriate regulatory authorities. Examples of such documentation include, but are not limited to:
- Safe work practices and policies;
  - Training records, including certifications for specialty work, as applicable;
  - Verifications that personnel are skilled and knowledgeable in their assigned duties;
  - Approved Job Safety Analyses (JSAs) as required;
- D.2.12 For oil, gas and sulphur activities performed on Fieldwood Energy's *facilities* and on a Contractor's *facility* on the OCS the Contractor agrees to the following, where "facilities" is defined to include all types of offshore structures permanently or temporarily attached to the seabed ( *i.e.* , mobile offshore drilling units; floating production systems; floating production, storage and offloading facilities; tension-leg platforms; spars used for exploration, development, production, and transportation activities for oil, gas, or sulphur from areas leased in the OCS, as well as wells, structures, living quarters, drilling and workover packages, process equipment, utilities and DOI regulated pipelines (except as noted in API RP 75 section 1.3.1.1):
- D.2.13 The Contractor must conduct, keep current and provide upon request to Fieldwood Energy Hazards Analyses (including Mitigation plans) of the Contractor's facilities and ongoing operations;
- D.2.14 The Contractor must manage and document all changes to the Contractor's facility that are directly involved in performing oil, gas and sulphur activities for Fieldwood Energy;
- D.2.15 The Contractor must develop and communicate an Emergency Action Plan to all personnel on the Contractor's facilities;
- D.2.16 The Contractor must conduct Job Safety Analysis (JSA) to identify potential task specific hazards associated with the work to be performed and must include the steps required to mitigate the

hazards identified. Copies of all JSAs must be kept at the work site and be readily accessible for at least 30 days to all personnel involved with the work. The Contractor must also maintain copies of all completed JSAs for at least 2 years.

- D.2.17 The Contractor must conduct routine safety meetings to communicate safety expectations, incidents, near miss reports, prevention, safety alerts, etc.
- D.2.18 The Contractor must immediately notify a Fieldwood Energy representative by whatever means of communication is most expedient, and shall maintain written records in addition thereto, of any incidents resulting in the following:
- Fatalities
  - All injuries that require the evacuation of the injured person(s) from the facility to shore or to another offshore facility
  - All losses of well control
  - All fires and explosions
  - All reportable releases of H<sub>2</sub>S gas
  - All collisions
  - All incidents involving severe structural damage
  - All incidents involving crane or personnel/material handling operations
  - All incidents that damage or disable safety systems or equipment
- D.2.19 Contractor is required to complete Fieldwood Energy incident reports and provide additional information as necessary in order to determine root cause and corrective actions.

## **E. Personal Protective Equipment (PPE)**

Contractor shall provide its employees and personnel with proper PPE for them to perform their jobs safely. Contractor shall also ensure that its employees and personnel are trained in the proper use and maintenance of all PPE issued. The following is only the minimum PPE required to work on facilities owned, operated or managed by Company or any of its affiliated or subsidiary companies. Any additional job specific PPE (face shields, goggles, respiratory protection, fall protection, hand protection, gas monitors, etc.) required by Company, governmental regulations or hazard assessments shall also be provided by Contractor.

### *Minimal PPE Requirements for contractors:*

- Safety Glasses – Safety Glasses shall comply with ANSI Z87.1 – 1989, as such may be updated or modified from time to time, and shall be worn in areas where personnel are exposed to flying particles and/or when working around pressurized process equipment, piping, pumps, etc.
- Hard Hat – Hard hats shall comply with ANSI Z89.1 – 1997, Type 1 requirements, as such may be updated or modified from time to time, and shall be worn at all times when working on Company facilities or work sites.
- Safety/Steel Toe Shoes / Boots – Safety/Steel toe shoes / boots shall comply with ANSI Z41 – 1991, as such may be updated or modified from time to time, and shall be worn at all times when working at any facility or work site owned,

operated or managed by Company or any of its affiliated or subsidiary companies.

- Hearing Protection – Hearing protection is required in high noise areas or areas that are posted as requiring hearing protection.
- Personal Flotation Devices (PFD's) – USCG Type 1 or 5 are necessary for any Work or portion thereof that is to be performed outside the handrails, on +10 level of offshore platforms, during personnel transfers to and from offshore platforms and while boarding and exiting boats from boat landings.

## **F. Inspections/Audits**

In addition to any right provided elsewhere in the Contract or otherwise available by law, Company reserves the right to inspect/audit the Environmental, Health and Safety activities of all contractors and subcontractors who work on any properties, facilities or premises owned, operated or managed by Company or any of its affiliated or subsidiary companies. Company or third party auditing teams or individuals may conduct these inspections/audits.

The objective of conducting an inspection/audit is to assess Contractor's compliance with applicable Company, governmental and regulatory requirements and to prevent adverse environmental and safety incidents.

### **F.1 Field Inspections/audits**

Company may have field inspections conducted so that the inspector(s)/auditor(s) can:

- Physically observe the Work or any part thereof that Contractor, or any of its subcontractors or personnel, is performing.
- Assess Contractor's performance of Work, or any part thereof, according to applicable Company, governmental or regulatory requirements.
- Advise Contractor regarding any deficiencies that are observed and require that such be corrected.

Company may conduct field inspections at any time and from time to time as Company, in its sole discretion, may deem necessary or appropriate to maintain compliance with the applicable requirements of Company or any governmental or regulatory agency or body.

### **F.2 Office Audits**

Company may have office audits conducted:

- To verify information that Contractor certifies as having when completing this Contractor Safety Program Requirements agreement.
- To check Contractor's documentation of training, safety meeting attendance, accidents, equipment inspections, safety program elements, etc.
- To share environmental, safety and health philosophies.

**G. Contractor's Acknowledgement and Agreement**

Contractor hereby acknowledges receipt, recognition and understanding of the minimal safety and environmental requirements set forth in this Contractor Safety and Environmental Requirements for working on any facilities/ work sites owned, operated or managed by Company or any of its affiliated or subsidiary companies. Contractor represents and warrants that it is currently in compliance with the requirements set forth herein and that Contractor shall continue to comply with these requirements for so long as Contractor may perform work for or on behalf of Company or any of its affiliated or subsidiary companies. Contractor further recognizes and acknowledges that the requirements set forth herein are minimal requirements and additional precautions or safety procedures may be needed to secure the safety of Contractor's employees and personnel; and Contractor agrees that it will establish such additional precautions or safety procedures as necessary or appropriate.