

SPCC PLAN FOR WORKOVER RIGS

INTRODUCTION

The overall effort of the Humble Workover Superintendent must be directed at the goal of conducting safe and efficient workover and completion operations. Effective on-the-job supervision is essential in order to prevent accidents which could cause injury to personnel and reduce the potential for accidents of a catastrophic nature. Accident prevention must be an integral part of the planning and execution of every job.

In order to assure maximum protection to personnel and facilities and preserve environmental quality, there are many work practices and safety procedures that must be followed. The purpose of this manual is to present safety practices and considerations, work procedures and guidelines, and supervision requirements and responsibilities for conducting Humble's offshore workover and completion operations. This manual should be a valuable training tool for both Humble and contract personnel. It was compiled with assistance from Offshore District operations and engineering personnel and service company personnel. A portion of the material was taken from lectures presented at Company schools.

There is no practical way to present guidelines to cover every possible situation that may arise. Workover and completion operations can be extremely complex at times, and the prevailing situation or well conditions will dictate the specific action required. The Workover Superintendent must always be guided by safe practices in performing his duties so that he will be prepared to meet any emergencies which may develop.

RESPONSIBILITIES OF THE HUMBLE WORKOVER SUPERINTENDENT

The Humble Workover Superintendent is responsible for planning, executing and supervising field operations concerned with workover and completion jobs. He also serves as the liaison between field operations, Management and the staff functions of Engineering and Accounting. To carry out these responsibilities, he must work primarily through contract and service company personnel with support from Operations Management and the Engineering staff.

SPECIFIC RESPONSIBILITIES

Some of the specific responsibilities of the Workover Superintendent include the following:

1. Insure that safe working conditions are maintained and safety practices are followed to prevent injury to personnel or damage to equipment.
2. Insure that all operations are conducted in compliance with Federal and State rules and regulations, including OCS Orders, and that the appropriate precautions are taken to prevent pollution.
3. Inform contract and service company personnel of their specific job objectives and insure that they are familiar with well conditions and work procedures to be used.
4. Provide on-the-job supervision of workover and completion operations.
5. Provide on-the-job and off-duty field training to insure that contract and service company personnel are capable of performing their jobs safely and efficiently, and that they are

POLLUTION PREVENTION AND CONTROL

It is Humble's policy to conduct pollution-free production operations in all areas of Company operations. The petroleum industry is actively supporting all efforts that lead to the conservation and improvement of the waters of the nation. Every person working at a water location has a responsibility to himself and to his company to prevent pollution. In this regard the Humble Workover Superintendent must conduct workover and completion operations in such a manner as to prevent pollution and keep wells under control at all times.

STATE AND FEDERAL REQUIREMENTS

The Workover Superintendent must be knowledgeable of the various State and Federal requirements pertaining to pollution prevention and control. The following are some of the Federal laws which prohibit the pollution of coastal and navigable waters of the United States and of the high seas adjacent thereto.

The Refuse Act of 1899

The Oil Pollution Act of 1924

The Outer Continental Shelf Lands Act

The Water Quality Improvement Act of 1970

Each of these laws prohibits the dumping of wastes into the waters. They also provide severe penalties for violations. A copy of OCS Order Numbers 1 through 11 is included in the MISCELLANEOUS SECTION of the manual. Order Number 7 deals specifically with pollution and waste disposal. It should be kept in mind that the Coastal States also have pollution laws with generous penalties provided for violations.

WASTE CONTROL AND DISPOSAL

The following liquid and solid materials shall not be disposed of into the waters of the Gulf, coastal areas, bayous, lakes, streams or any other water body.

Liquid Disposal

1. Oil in any form
2. Liquid waste materials containing substances which may be harmful to aquatic life or wildlife, or injurious in any manner to life or property
3. Drilling mud containing oil or substances having toxic effect
4. Any other liquid that may pollute or be harmful to aquatic life or wildlife, or injurious in any manner to life or property.

Solid Waste Disposal

1. Drill cuttings, sand and other solids containing oil
2. Trash, paper, mud or chemical container, plastic, other solid waste and other non-edible waste. Waste will be hauled to an appropriate disposal area or burned in offshore incinerators.

GUIDELINES FOR POLLUTION PREVENTION AND CONTROL

1. The training and indoctrination of all personnel is important particularly in the case of workover rig crews and wireline crews, who by the nature of their work are apt to cause pollution. Pollution training and indoctrination should be included at periodic safety meetings.
2. All piping and connections should be carefully checked for leaks, particularly before performing plastic jobs, stimulation jobs or any other activity where diesel oil will be used.

3. Drip pans under pumps and engines should be checked and cleaned daily by the rig crew.
4. During concentric unit operations, a funnel (or bell nipple) should be installed on top of the BOP stack with a discharge line running to a tank or sump. The tank or sump should be equipped with a float to provide automatic discharges and prevent overflow. However, the fluid level in the tank or sump must be visually checked frequently.
5. Oil must not be allowed to accumulate on the platform deck. It must be picked up or swept to drains.
6. Enjoy's industrial cleaner, 8553, should be used for general maintenance, housekeeping and cleaning of equipment and platform decks.
7. A chemical dispersant, such as Corexit 7664, must not be used to disperse an oil spill without prior approval from State and Federal regulatory agencies.
8. Any person observing an oil spill should immediately report to the Humble Field Superintendent or the ranking Humble employee available.
9. All oil spills must be reported immediately to the Grand Isle Office regardless of the source.
10. The Southeastern Division has developed a contingency plan which presents operating instructions for handling various sizes of oil spills. The Workover Superintendent should be familiar with this oil spill contingency plan.
11. WHAT TO DO WHEN SPILLS OCCUR
 - a. Close in or re-route fluids temporarily to eliminate the cause and limit the size of the spill.
 - b. Initiate repairs or action to prevent future pollution

- c. Call Operations Superintendent, Assistant District Manager or District Manager as soon as possible.
- d. Initiate action as required by contingency plan to contain, remove and clean up spill.

12. WHAT TO DO WHEN CITED

- a. Do not admit blame - personally or on the part of the Company.
- b. Take immediate action to eliminate pollution caused by Company operations.
- c. Do not make known false statements.
- d. Accept citations courteously and cooperate with enforcement officials.
- e. Call Operations Superintendent, Assistant District Manager or District Manager as soon as possible.
- f. Initiate action as required by contingency plan to contain, remove and clean up spill.