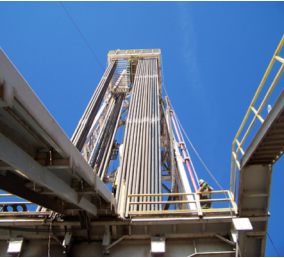


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JULER GROUP IDENTIFIES MULTI-EMPLOYER CONFINED SPACE ENTRY OPERATIONS A CHALLENGE IN OIL & GAS DRILLING OPERATIONS. TRAINING CONTRACTORS IN CONFINED SPACE ENTRY AND RESCUE, AND MULTI-EMPLOYER REQUIREMENTS, IS ESSENTIAL.



Houston, Texas. June 29, 2015 – Juler Group Incorporated (JGI) training team identifies multi-employer confined space challenge during O&G drilling and exploration operations. JGI has discovered through discussions with contractors that confusion exists regarding the delegation of the range of duties required in permit required confined space entry operations.

In O&G drilling and exploration many energy producers have classified the well bore cellar as a permit required confined space. Individuals from different companies who perform various well drilling and completion activities may enter this space. Entering this space now places additional obligations on each employer. In this dynamic environment confined space entry operations demand an understanding of the following:

1. Each employers responsibilities within the Occupational Safety and Health Administrations (OSHA) multi-employer policy, and
2. Each individuals' duties in compliance to the applicable permit required confined space standard 29 CFR 1910.146 or 29 CFR 1926.1200.

The Health and Safety professional must consider the roles required of their own employees and the integration with the roles of other employers in a multi-employer scenario. Prior to confined space entry each employer must agree to increased communication, cooperation and accountability.

Multi-Employer Policy

The OSHA multi-employer policy outlines responsibilities for 1) Creating, 2) Exposing, 3) Correcting, and 3) Controlling employers. The contractor must understand which employer designation they must adhere to while working onsite.

Creating Employer

Creating employers cause a hazardous condition. The contractor may or may not cause a hazardous condition. The sudden release of toxic, flammable or oxygen consuming agents may be unrelated to the contractor's activities, yet the contractor is exposed. In this case creating employers may be accountable if employees from other companies are exposed to the created hazard. This also applies to the contractor creating, and exposing others to, a hazard. If a creating employer creates a hazard it must take all reasonable steps to prevent exposure to its own, and other employers', employees, In addition, the creating employer must immediately notify the controlling or correcting employer of this hazard.

Exposing Employer

Exposing employers expose "their own" employees to a hazard. This can happen even if this employer does not "create" the hazard. If the exposing employer created the hazard it is also accountable for violating the standard as a creating employer. If another employer creates the hazard, the exposing employer is accountable if 1) it knew of the hazardous condition or failed to exercise reasonable diligence to discover the condition, and 2) if it failed to take steps consistent with its authority to protect is employees.

Exposing employers must correct hazards when it has authority to do so. When it does not have this authority it is accountable when it fails to 1) ask the creating and/or controlling employer to correct the hazard, 2) inform its employees of the hazard, and 3) take reasonable alternative protective measures for its employees. Exposing employers will be accountable if it is determined it neglected to protect its employees.

Confined Space Standard

The OSHA permit required confined space standard outlines specific responsibilities that must be carried out in confined space entry operations. Duties exist for supervisor, authorized entrant, attendant, and rescue activities. Each has specific obligations that cannot overlap during execution of entry procedures. A contractor should be proficiently trained in confined space classification, entry and rescue. This includes training in atmospheric monitoring for oxygen content, flammable and toxic conditions. It includes training in situational awareness and the ability to apply knowledge in response to exposure symptoms and changing space conditions. It also includes awareness of activities and processes that result in changing conditions in adjacent areas that may affect the work zone within the space.

The Confusion

In drilling operations many contractors perform work for the drilling contract manager, After the spud rig leaves the drilling manager sets up the drilling rig over the main hole and the well bore cellar is built and operations begin. The well bore is now the focus of all operations until total depth is reached. The well bore, a permit required confined space, is now entered by a variety of contractors to the drilling manager or exploration and production owner.

In our discussions, contractors have voiced their confusion regarding all the confined space requirements and the accountability chain that must be fulfilled. They state that in many instances the company man or HSE representative of the owner split responsibilities for confined space entry operations. Furthermore, contractors state that there are no vetted standby confined space rescue services on location. The contractors are confused as to their responsibilities in this scenario.

In one case, a contractor said the owners HSE representative took on the role of attendant but required the contractor doing the work to perform atmospheric monitoring. This is clearly an attendant function. In addition, the attendant lost line of sight to the individual who had climbed over and under obstacles resulting in a clear entanglement problem if non-entry rescue would be needed. Furthermore, the attendant removed himself from the immediate vicinity of the well bore to take a break and smoke. When questioned about this behavior the attendant told the worker that he was responsible for monitoring and self-rescue.

Avoiding Confusion

In drilling operations contractors must cooperate with owners and operators of a particular well site. OSHA stresses the point that there must be exceptional communication, honest cooperation and strict accountability between the parties. To this end, the contractor must ask the following:

- Will he rely on the controlling employers evaluation and classification of the space? In the case where the space owner classifies the space the contractor should review and verify all classification documents and agree to the identified hazards and their controls. If there is disagreement, the contractor must perform its own space classification by a competent person.
- Will he relinquish attendant responsibilities, with its requirement for atmospheric monitoring, to the controlling employer? In the case where the controlling employer provides the attendant the contractor should review all tasks to be performed within the space by the contractor. The contractor must interview the attendant to ensure understanding of confined space entry procedures, and inspect all atmospheric monitoring equipment and results prior to initiating entry operations.
- Will he relinquish rescue responsibilities to the controlling employer? The contractor must assess whether the rescue plan and systems are appropriate based upon the hazards, space configuration, and line-of-sight or communication needs. If a service specialist has to climb over and under flow crosses, production annuli and other obstacles special attention must be given to the type of rescue.
- Will he utilized the safe work practices developed by the controlling employer? The contractor must review and verify all safe work practices are appropriate to the specific space and the work activities to be carried out.

The HSE professional for a contractor must answer these questions to avoid confusion. They must also ensure their employees are well prepared to address these ambiguities in the field by knowing the standard and the multi-employer policy. The contractor must clear up any role delegation issues and gain written agreement for accountability prior to confined space entry.

Conclusion

To avoid confusion in multi-employer permit required confined space entry operations the contractor must understand both the confined space entry standard and the multi-employer policy. To meet this need employees must be trained in entry and rescue operations, above and beyond simple awareness training. This includes supervisor, authorized entrant, attendant and rescue.

To avoid conflict between owner, operator, drilling manager and contractor, there must be increased communication, cooperation and accountability. Although achievable, it is OSHA opinion that best practice should prevail: the contractor should carry out all confined space entry and rescue operations.

Juler Group Incorporated is a professional and technical services firm offering total solutions for the occupational health, safety and environmental professional. Juler Group provides risk and hazard assessment services, industrial hygiene monitoring support, safety program design and implementation, health and safety audits, process safety management, leadership and ethics services, and unequalled training development and delivery.

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