

### **POLICY**

Universal Wellhead Services, LLC has adopted the following program to ensure that short service employees are identified, appropriately supervised, trained, mentored, and managed. This program is adopted in order to prevent accidents such as personal injury, injury to others, environmental damage, and/or property damage by the short service employee.

### **RESPONSIBILITIES**

We recognize that the responsibilities for safety and health are shared:

- Universal Wellhead Services, LLC accepts the responsibility for leadership of the safety and health program, for its effectiveness and improvement, and for providing the safeguards required to ensure safe conditions.
- Supervisors are responsible for developing the proper attitudes toward safety and health in themselves and in those they supervise, and for ensuring that all operations are performed with the utmost regard for the safety and health of all personnel involved, including themselves.
- Employees are responsible for wholehearted, genuine operation with all aspects of the Safety and Health Program including compliance with all rules and regulations – and for continuously practicing safety while performing their duties.

### **DEFINITION**

Universal Wellhead Services, LLC defines a short service employee (SSE) as any person or personnel with less than six (6) months experience in his/her current position or with one's current employer. A person or persons can also be classified as an SSE if they change jobs within the company they are working for or as a new hire for the same type of position for another company.

### **WORK CREW ASSIGNMENTS AND RESTRICTIONS**

- A SSE may not work alone
- When crew/group sizes of less than five (5) are assembled, no more than one (1) SSE per group/crew is allowed
- When working with crew/group sizes larger than five (5) members, the SSE's will not exceed 20% of the crew/group make up. When the crew/groups exceed the twenty percent (20%) make up of SSE's, this will only be permitted with a written variance form, which will serve as the mitigation plan; approved by the Supervisor and/or Manager in charge of the project.

### **COMMUNICATION AND NOTIFICATION**

The following procedure will be followed to ensure the host facility knows when a SSE is working at their site. The processes for the proposed crew/group, when using an SSE, are outlined in the Short Service Employee Form. Prior to beginning the job assignment the Supervisor/Manager in charge will submit to the projects coordinator, on-site supervisor, or contractor; the completed SSE form for all the jobs that will contain SSE personnel. The work owner or supervisor/person in charge will decide SSE approval status and will keep the original completed form in the project files.

## **IDENTIFICATION**

All SSE personnel will be visibly identified. This will be done by employing one of the following methods:

- Wearing a uniquely colored high-visibility Hard Hat or
- Wearing a uniquely colored high-visibility Vest
- Any method which clearly identifies the employee as an SSE to anyone onsite

## **MONITORING SSE**

The supervisor will monitor their employees, which includes the SSE personnel for Health, Environment and Safety (HES) awareness.

The identifier marking the SSE may be removed from the SSE Program at the discretion of the supervisor at the end of the required six-month period if he/she has:

- Worked safely
- Adhered to all HES policies
- Had no recordable incidents attributed to him/her

The supervisor shall require the employee that fails to complete the six-month period free of recordable incidents, to get the operator to approve in writing prior to allowing the person to return to the operator's property.

## **MENTORING PROCESS**

This will be done by assigning all SSE's a mentor for the first six (6) months of employment. A mentor's responsibility is to provide guidance and develop the SSE personnel. A mentor may only be assigned one (1) SSE per crew/group. The mentor must be onsite with the SSE to monitor the SSE at all times.

The mentor must meet the following requirements:

- Be familiar with the SSE's job, have the oversight responsibilities required, and all hazards accompanied with the job
- Have up to date orientation training
- Be familiar with all site policies, procedures, and any required specialized actions with the work to be done
- Show the ability to recognize any hazards and/or unsafe acts
- Are able and willing to challenge their personnel on the job if they do not meet site procedures, policies, or other requirements and will see that the stop work authority is enforced
- Participate actively in the behavior-based safety process

Note: A mentor must keep a helpful eye on new hire's in your crew. Take time to describe the layout of the project, the best method to access the work, or how to work a tool they have never used before.

## **SUBCONTRACTOR MANAGEMENT**

Subcontractors working on site will have assigned mentors that monitor their employees only. Mentoring of outside employees will be done on an individual basis, and as required. They will also be managed following this policy.

## **HIGH HAZARD AREAS**

SSE's may in certain situations be prohibited from entering into and working in high hazard areas, these may include:

- Naturally occurring radioactive material (NORM)
- H<sub>2</sub>S areas
- Confined spaces
- High Voltage environments, etc

## **PROCEDURES**

Universal Wellhead Services, LLC has set forth these procedures to verify all work is being carried out under the guidelines of this chapter by having:

- The supervisors communicate the SSE policy and procedure at all pre-job meetings
- The supervisor submits the crew/group makeup and all SSE form(s) to the on-site representative of the work owner for approval
- The supervisor will have the on-site representative validate the crew/group makeup and experience level
- The supervisor will see that the on-site representative approves the SSE variance form
- The supervisor will make sure the on-site representative posts the forms to the appropriate database, if required

## **PROGRAM REVIEW**

Universal Wellhead Services, LLC's Short Service Employee Program will ensure the following practices are kept up to date on a regular basis when using and working with SSE's:

- Continuous monitoring of the SSE
- Ensuring all changes/updates to the forms are submitted prior to beginning work and whenever a change may occur thereafter



**Contractor Short-Service Employee Form & Variance**

Supervisor must complete and submit this form to work owner supervision for approval prior to arrival on location. The work owner supervision must approve the individual SSE before he/she arrives on location.

SSE Information			
Contractor Company name:			
Request Date:			
SSE Name:			
Date of Employment:		Current Job Title:	
Years Related Experience:	Experience in Current Position:	Yrs	Months
Is this employee in compliance with your Substance Abuse Policy?		<input type="checkbox"/> Yes	<input type="checkbox"/> No
Have site owner, contractor and HES policies (including Stop Work Authority) been reviewed with SSE?		<input type="checkbox"/> Yes	<input type="checkbox"/> No
Who has been assigned as the SSE's mentor?			
Mentor's Experience:		Yrs	Months
List all training provided to the SSE:		List any previous special training:	
SSE(s) identified by: <input type="checkbox"/> <b>Hard Hat</b> -High Visibility <input type="checkbox"/> <b>Vest</b> -High Visibility			
<input type="checkbox"/> Other: _____ Color: _____			



## Contractor Short-Service Employee Form & Variance Page 2

<b>II. SSE Crew Composition Requirements</b>	
Choose one of the crew types below. If any of the stated limitations are exceeded, proceed to the variance form on next page.	
<input type="checkbox"/> Single person crew-cannot be an SSE (Variance Required)	
<input type="checkbox"/> 2-4 person crew-no more than one SSE	
<input type="checkbox"/> 5 or more person crew-no more than 20% SSE(s) per crew	
<input type="checkbox"/> Exceeding 20% SSE per crew (Variance Required)	
<b>III. SSE Review and Approval</b>	
<input type="checkbox"/> Contractor Supervising Manager:	Date:
<input type="checkbox"/> CPL Work Location Supervisor:	Date:
<input type="checkbox"/> Work Owner:	Date:
<b>IV. Contractor SSE Form Repository</b>	
<input type="checkbox"/> CSM Data Base:	Date:
<input type="checkbox"/> CPL Work location	Date:
<input type="checkbox"/> Work Owner file:	Date:



Contractor Short-Service Employee Form & Variance Page 3

This form is to be filled out whenever the conditions on this form or any other element of the Short Service Employee Policy cannot be met.

IV. Variance Information	
<b>Variance Justification</b> (What are the current circumstances and what will be done to ensure an acceptable level of risk?)	
<b>Alternatives to Variance</b> (If the variance is denied, what are the alternatives to completing the scope of the work? Briefly detail the cost and operational impact of the alternatives.)	

List the steps to be taken to manage/mitigate the SSE risk to an acceptable level:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_
7. \_\_\_\_\_
8. \_\_\_\_\_
9. \_\_\_\_\_
10. \_\_\_\_\_

V. Variance Review and Approvals

Variance Expiration Date: \_\_\_\_\_

Contractor Manager/Supervisor  Approves  Denies

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Work Owner's Onsite Representative  Approves  Denies

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Note: For large jobs, please use a separate sheet to list all SSEs on the crew by name and job title.





