Safety and Environmental Management System

SEMS Plan

Talos-COMP-001

30 CFR 250 Subpart S

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Revision Approvals and Authorization

APPROVALS AND AUTHORIZATIONS				
		TITLE	**SIGNATURE**	**DATE**
1	Issued by	HSE Manager	Cameron Womack	8/3/2017
2	Accepted by	VP HSE	Robert Sheninger	8/3/2017
3	Approved by	President	Tim Duncan	8/3/2017

History: This document will be reviewed every calendar year (not to exceed 15 months) by the HSE Manager or designee. All revision history records will include the date of any and all changes in this document. Management (Vice President and above) will re-sign the SEMS Manual when the changes affect the substance of the program. All other revisions will be signed and approved by HSE Manager.

REVISION HISTORY					
Rev. No.	**DATE**	**REVISED BY**	**Approved By**	**CHANGES**	**MOC NO.**
0	11/14/11		JE	Original Issue	
1	11/15/12	SRF	JE	Annual Review of SEMS Manual	COMP-006
2	04/10/13	SRF	CJ	Updates based on 2013 I3P SEMS Audit	COMP-015
3	05/19/14	SRF	CJ	SEMS II Updates	COMP-026
4	01/15/15	SRF	SH	Annual SEMS Review	COMP-043
5	12/07/15	SRF	JS	SEMS Audit Corrections	COMP-053
6	07/26/17	CWW	RS	Annual SEMS Review	COMP-1768

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1.0 INTRODUCTION

The Talos SEMS program is designed to foster behaviors to ensure personal health, safety, and environmental protection during offshore oil and gas operations. The SEMS addresses the identification and management of risk, safety hazards, and environmental impacts in design, construction, and startup operation; this includes but is not limited to drilling, decommissioning, inspection, and maintenance of MODUs when attached to the seabed and production facilities.

Our SEMS program incorporates a framework of continuous improvement mechanisms through HSE elements that allow for planning, performing, measuring, and acting phases to be executed through operational activities:

- Monitor and control the safety and environmental policy
- Operate and maintain facility equipment
- Identify and mitigate safety and environmental hazards
- Manage changes to operating equipment, processes and personnel
- Respond to and investigate accidents, upsets, and near misses
- Train personnel
- Standardize practices, objectives, data collection processes, reporting systems, audit systems, key performance indicator monitoring systems, and goal achievement processes
- Perform every aspect of our business in compliance with laws and regulations
- Consider HSE issues in the design, construction, maintenance, operation, and decommissioning of our equipment and facilities
- Work in collaborative partnership with stakeholders, regulators, suppliers, customers, contractors, consultants, and agents to continually improve our business while addressing our health, safety, and environmental risk matters
- Promote and demonstrate our commitment to prevention of undesirable emissions with a focus on minimizing waste generation, waste recycling, while appropriately addressing environmental issues
- Work diligently to educate, inform, and prevent safety incidents and environmental accidents by engaging and educating employees about their role and responsibilities
- Review and audit the HSE processes to identify and implement corrective and preventative measures to continually improve HSE performance as reflected in our HSE commitment

1.1. Purpose

The purpose of SEMS is to establish safety and environmental objectives, goals, and performance measures. This plan describes the program elements that will enable Talos to achieve excellence in safety and environmental management.

1.2. Scope

This SEMS Plan applies to operations of Talos, and all operating subsidiaries, including ERT, TEO, and TGCO.

The Plan applies to all Talos owned assets in the United States GOM OCS Waters. The assets are oil and gas production facilities, DOI-regulated pipelines, and associated equipment that have potential for creating a safety hazard or significant environmental impact. In addition, this plan applies to MODUs and floating production systems when attached to the seabed.

1.3. Objective

The objective of this document is to establish a comprehensive company safety and environmental management program.

The SEMS has five principal objectives:

- Control the influences that human error and poor organization have on accidents.
- Continuously improve the Talos safety and environmental record.
- Encourage performance-based operating practices.
- Collaborate efforts to promote offshore safety and environmental protection.
- Effectively communicate the Talos safety and environmental objectives, goals, and performance measures.

1.4. Industry Standards and Recommended Practices

The API has created Recommended Practice 75, RP for the Development of an SEMP. RP 75 is a detailed guide for SEMS endorsed by the BSEE. The Talos SEMS is based on the recommendations and guidelines of API RP 75 current edition, as amended by 30 CFR Part 250, Subpart S.

Talos utilizes the latest approved edition of the following API Standards in the design, procurement, installation, operation and maintenance of their assets.

STANDARD	DESCRIPTION
API RP 2A-WSD	Recommended Practice for Planning, Designing and Constructing Fixed Offshore Platforms – Working Stress Design
API RP 2D	Recommended Practice for Operation and Maintenance of Offshore Cranes
API RP 2L	Recommended Practice for Planning, Designing, and Constructing Heliports for Fixed Offshore Platforms
API RP T-2	Recommended Practice for Qualification Programs for Offshore Production Personnel Who Work with Anti-Pollution Safety Devices
API RP 14C	Recommended Practice for Analysis, Design, Installation and Testing of Basic Surface Safety Systems for Offshore Production Platforms
API RP 14E	Recommended Practice for Design and Installation of Offshore Production Platform Piping Systems
API RP 14F	Recommended Practice for Design and Installation of Electrical Systems for Offshore Production Platforms
API RP 14G	Recommended Practice for Fire Prevention and Control on Open Type Offshore Production Platforms
API RP 14H	Recommended Practice for Use of Surface Safety Valves and Underwater Safety Valves Offshore
API RP 53	Recommended Practice for Blowout Prevention Equipment Systems for Drilling Wells
API RP 54	Recommended Practice for Occupational Safety for Oil and Gas Well Drilling and Servicing Operations
API RP 55	Recommended Practice for Oil and Gas Producing and Gas Processing Plant Operations Involving Hydrogen Sulfide
API RP 59	Recommended Practice for Well Control Operations
API RP 64	Recommended Practice for Diverter Systems Equipment and Operations
API RP 70	Recommended Practice for Security for Offshore Oil and Natural Gas Operations
API RP 701	Recommended Practice for Security for Worldwide Offshore Oil and Natural Gas Operations

STANDARD	DESCRIPTION
API RP 75	Development of a Safety and Environmental Management Program for Outer Continental Shelf Operations and Facilities
API RP 76	Recommended Practice for Contractor Safety Management for Oil and Gas Drilling and Production Operations
API RP 500	Recommended Practice for Classification of Locations for Electrical Installations at Drilling Rigs and Production Facilities on Land and on Marine Fixed and Mobile Platforms
API RP 505	Recommended Practice for Classification of Locations for Electrical Installations at Petroleum Facilities Classified as Class I, Zone 0, Zone 1 and Zone 2
API RP 521	Guide for Pressure Relief and Depressuring Systems
API RP 540	Recommended Practice for Electrical Installations in Petroleum Processing Plants
API RP 2003	Protection Against Ignitions Arising Out of Static, Lightning, and Stray Currents

1.5. Terms and Acronyms

The following terms and acronyms are used in this document:

TERM	DESCRIPTION
AB	Accreditation Body
API	American Petroleum Institute
ASP	Audit Service Provider
BOEM	Bureau of Ocean Energy Management
BSEE	Bureau of Safety & Environmental Enforcement
CFR	Code of Federal Regulations
CPR	Cardiopulmonary Resuscitation
COS	Center for Offshore Safety
M& H-EDMS	M&H Electronic Data Management System
SC-EDMS	SEMPCheck Electronic Data Management System
EEP	Emergency Evacuation Plan
EPP	Employee Participation Plan
ERT	Energy Resources Technology
FA	Failure Analysis
GOM	Gulf of Mexico
H_2S	Hydrogen Sulfide
HA	Hazard Analysis
HSE	Health Safety and Environmental
INC	Incident of Noncompliance
IRT	Incident Reporting Tool
ISN	ISNetWorld
JSA	Job Safety Analysis
LOTO	Lockout/Tagout
MOC	Management of Change
MODU	Mobile Offshore Drilling Unit
MSA	Master Service Agreement
QA	Quality Assurance
OCS	Outer Continental Shelf
OSRP	Oil Spill Response Plan

TERM	DESCRIPTION
PDF	Portable Document Format
PIC	Person in Charge
PINC	Potential Incident of Noncompliance
RIK	Replacement in Kind
RP	Recommended Practice
SDS	Safety Data Sheets
SEMP	Safety and Environmental Management Program
SEMS	Safety and Environmental Management System
SWA	Stop Work Authority
SWP	Safe Work Practices
TEO	Talos Energy Offshore
TGCO	Talos Gulf Coast Onshore
USCG	United States Coast Guard
UWA	Ultimate Work Authority

2.0 MANAGEMENT PROGRAM ELEMENT PRINCIPLES

2.1. General §250.1902

The SEMS program covers operating activities, procedures and assets. It is designed to be flexible, responsive and representative of the company's culture, objectives and operations. It combines various programs into a single, integrated, continuously improving management plan. SEMS consists of the following 17 elements, which provide the framework for promoting continuous improvement to the company's safety and environmental record:

1. General
2. Safety and Environmental Information
3. Hazards Analysis
4. Management of Change
5. Operating Procedures
6. Safe Work Practices
7. Training
8. Mechanical Integrity
9. Pre-Startup Review
10. Emergency Response and Control
11. Investigation of Incidents
12. SEMS Auditing
13. Recordkeeping
14. Stop Work Authority
15. Ultimate Work Authority
16. Employee Participation Program
17. Reporting Unsafe Working Conditions

Revisions to the SEMS Plan will be approved by upper-management. All other document revisions will be approved by the SEMS manager.

2.1.1. Goals and Performance Measures

Talos has established the following goals and performance measures that demand accountability for SEMS program implementation to the designated resources:

1. Safety and Environmental Information will be complete and current for all facilities.
2. Hazard Analysis Action Items will be addressed within 90 days of the analysis.
3. Major MOCs will be closed within 90 days of start-up.
4. Mechanical Integrity Action Items will be addressed in accordance with the Talos Pressure Vessel Piping and Tank Inspection Guidelines.
5. Incident Investigation Action Items will be addressed with 60 days of the final report.
6. SEMS Audit Recommendations will be addressed within 60 days of the final report.
7. Issue Near Miss Reports within 60 days of classification of the incident.
8. Conduct one Annual Spill Notification Drill for every manned Talos platform.
9. Conduct one Annual Tabletop Exercise.
10. Maintain INC component ratio below industry average.
11. Monitor FA/Incident ratio for continuous improvement.
12. Quarterly review of ISN Contractor Grading Report.
13. Quarterly review of SEMPCheck Testing and Device Failures.
14. Monthly review of Behavioral Safety Observation Program (BSOP) Report.

2.1.2. Talos SEMS Management

Talos has appointed the following management designees who are responsible for maintaining an effective SEMS program:

1. HSE and SEMS Manager – Elements 1-4, 6, 7, 8, 9, 11, 12, 13, 15, 16, 17 Regulatory Interface, management updates
2. Operations Manager – Elements 5, 10, 14
3. Vice President of Production Operations - SEMS Program Compliance, MODU Interface

2.1.3. Employee Communications

Changes to the SEMS Plan, including safety and environmental data, are communicated to employees and/or contractors in several ways.

- Weekly email with updates to the Document Register and associated documents
- Weekly MOC status report
- Safety Communications
- Foremen's meetings (2 to 3 per year)
- Drawing distributions
- Annual SEMS refresher training
- Approved contractor list distribution

2.1.4. External Communications

To better foster communication between Talos and external interested parties, including both regulatory agencies and the general public, Talos Energy has taken the following measures:

- Portions of the Talos SEMS Plan are available for public review on the company website.
- Talos maintains a link on the Talos website pursuant to which the public can inform Talos of any safety or environmental concerns. Talos has also provided a toll-free phone number located on the website for the same purpose. Talos shall promptly investigate all concerns and take all appropriate remedial actions necessary to address such concerns. Talos shall report such matters to the applicable regulators as appropriate.
- In the event Talos becomes involved in any major safety or environmental event, the Company will establish a website to keep the public adequately informed, as appropriate.
- Talos maintains an internal regulatory department that receives regulatory communications and distributes the pertinent information throughout the organization, as appropriate.

2.1.5. Reference Documentation

The information is maintained on the Talos EDMS or other appropriate systems. The information is readily accessible through the document control process described in Section 2.13.5 EDMS Document Control Process.

2.2. Safety and Environmental Information §250.1910

Safety and environmental information shall be compiled and maintained for each installation, per Section 2.13 Records and Documentation §250.1928. This information provides the basis for implementing program elements. It is available for each installation and is readily accessible through the Talos EDMS.

2.2.1. Environmental Resources

The following resources will be considered in the Talos SEMS program:

- Water quality
- Air quality
- Biological resources including protected species, chemosynthetic and benthic communities
- Archeological and cultural resources

2.2.2. Process/Mechanical Design Information

The safety and environmental information includes the following documentation on process and mechanical design, as appropriate:

- Simplified process flow diagrams (safety flow diagram)
- Measurement and allocation diagram (commingling diagram)
- Acceptable upper and lower control limits for temperature, pressure, flow, and composition, where applicable (SEMPCheck and monthly testing)
- Electrical area classifications
- Design basis of relief system (vent study as applicable)
- Equipment arrangement drawings (layout drawings)
- structural drawings
- Descriptions of alarms, shutdowns, and interlock systems (Safe Charts)
- Descriptions of well control systems (operating procedures)
- Passive and active fire protection systems (fire and safety layout)
- Emergency evacuation procedures (station bill)
- Pipeline drawings

2.2.3. Facility Status

There are four platform status levels identified by Talos.

1. High Priority – Typically manned, complex facilities with higher production rates and/or sour gas production
2. Low Priority – Typically unmanned, simple facilities with lower production rates
3. Shut-in – Shutdown; this designation is for facilities either shut-in permanently or for an undetermined period
4. Exempt – Platforms operated by other Lessees

Platform status is tracked on the Talos Platform Status Report (Talos-SEMS-2.2-001). The platform status shall be used to determine the safety and environmental information requirements, type and frequency of hazard analysis required and the appropriate level of mechanical integrity inspections, as described in the respective sections of this document. An MOC is required to change the status of a platform. This MOC will ensure that the proper level of safety and environmental information is in place and that the appropriate analyses have been performed.

Pipeline status is maintained within SEMPCheck. Pipelines will be identified with one of the following status:

1. Active – Production flowing through the line within the past 30 days
2. Out of Service – Pipeline shut-in, no flow within the past 30 days
3. Pickled – Pipeline flushed with inhibited seawater but still connected to the host
4. Proposed Abandoned – BSEE submittal has been made to abandon pipeline
5. Abandoned – Pipeline flushed and disconnected on both ends

Pipeline status is updated by Operations within SEMPCheck on a monthly basis.

2.2.4. Reference Documentation

The safety and environmental information is maintained on the Talos M&H-EDMS or other appropriate systems. The information is readily accessible through the document control process described in Section 2.13.5 EDMS Document Control Process.

2.3. Hazards Analysis §250.1911

A routine hazards analysis shall be performed for all Talos facilities subject to SEMS. Each facility shall be scheduled for the purposes of evaluating, identifying, and, where possible, reducing the chances of uncontrolled releases and other safety or environmental incidents. The Talos Platform Status report (Talos-SEMS-2.2-001) indicates the dates of the latest and next required hazard analysis, as well as the required type of hazard analysis for each facility.

HA information (HA reports and risk assessments) that is available for each installation will be maintained to ensure design integrity through the MOC process, as required.

2.3.1. Hazard Analysis Facility-Level

The hazards analysis will be appropriate to the complexity of the operation to manage the hazards involved. The detailed hazard analysis methodology is described in the Talos Hazard Analysis Guidelines (Talos-SEMS-2.3-001). Hazard analysis guidelines will incorporate follow-up to ensure hazards analysis issues are resolved and properly documented. All identified hazards and follow-up actions will be distributed to the appropriate personnel.

In addition, any actions that require immediate action or resolution prior to start-up will be remedied within the appropriate time-frame. Open HA action items will be tracked through the MOC process.

2.3.2. Job Safety Analysis

JSA is a method that can be used to identify, analyze and record the steps involved in performing a specific job safely while identifying the potential risks associated with each step. Recommended actions are included to reduce or eliminate those risks identified. A JSA will be required prior to performing potentially hazardous or non-routine work on a system and/or facility. It requires communication and coordination between management, supervisors, operators, and those who perform the work.

For routine tasks that do not typically require a JSA, the PIC will consider changes in personnel, procedures, equipment, and/or environmental conditions that could indicate that a JSA should be completed. The PIC may require a JSA for a typically routine task in those situations.

JSA Form

Before any work that is potentially hazardous or non-routine can commence, the job tasks shall be identified in writing and placed on the Talos JSA Form (Talos-SEMS-2.3-002). All personnel involved with the tasks shall review and participate in a JSA to ensure that all risks are identified and recommendations are made in writing.

- A copy of the most recent JSA (operations/task level) will be placed in a conspicuous location at the job site where the specific pieces of equipment to be worked on are located and any special precautions to be taken.
- The JSA must identify, analyze, and record the following:
  - Steps involved in performing a specific job
  - Existing or potential safety and health hazards associated with each step
  - Recommended action(s) or procedure(s) that will eliminate or reduce these hazards and the risk of a workplace injury, illness, or environmental impacts
- The immediate supervisor of the crew performing the job onsite must conduct the JSA, sign the JSA and ensure that all personnel participating in the job understand and sign the JSA.
- The PIC of the facility must approve and sign the JSA. On smaller facilities, with limited staffing (less than four people), the immediate supervisor of the crew and the PIC may be the same individual. Due to the limited work scope conducted with this staffing level, the PIC may provide both signatures. In addition, the PIC may participate in the job scope.
- If additional personnel are added to a task, the immediate supervisor of the job will review the JSA and have the new crew members sign the JSA before allowing them to participate in the task.
- An electronic signature or email approval on the JSA is an acceptable alternative to a written signature.

2.3.3. Reference Documentation

The Hazard Analysis information is maintained on the Talos EDMS. The information is readily accessible through the document control process described in Section 2.13.5 EDMS Document Control Process.

2.4. Management of Change §250.1912

An MOC process shall be used to identify and control hazards associated with changes to the facility, process, equipment and safety systems. Talos is taking care to prevent the likelihood of compromising safety and environmental impact through a properly implemented management of change work process. In production facilities and organizations, the MOC process provides communication crucial to personal and environmental safety.

2.4.1. Criteria for MOC

Talos has an established written work process (Talos-SEMS-2.4-001) implemented to manage change associated with the following:

1. Equipment
2. Operating procedures
3. Personnel changes
4. Materials
5. Operating conditions

The MOC work process does not include situations involving replacement in kind.

2.4.2. Changes in Facilities

Situations may arise whenever a facility process or mechanical design is altered. This type of change will initiate the Talos MOC work process. Reference API RP 75 Section 4 for typical instances where change occurs in facilities. MOCs shall describe the technical basis for the change and address the impact of the change on safety, health, and the coastal and marine environments. In addition, any effects on separate but unrelated upstream or downstream facilities will be reviewed.

2.4.3. Changes in Personnel

Change in personnel occurs whenever there is an organization change in personnel that manage or supervise the facility or operating personnel.

Organizational changes brought about by acquisition or sale of a facility may necessitate a complete review of the facility's SEMS.

2.4.4. Managing the Changes

The Talos MOC work process is designed to be flexible enough to accommodate management of the following covered changes:

1. Major changes – those changes that impact regulatory compliance documentation including safety flow diagrams, SAFE Charts, layout drawings, operating procedures, drilling procedures, and wellwork procedures.
2. Personnel changes – those changes affecting Talos management from the President through the Facility Foreman. The Facility Foreman will be responsible for ensuring that their platforms are staffed with the appropriate number of properly trained personnel on a daily basis. MOCs will not be required for daily movement of operations personnel between facilities.
3. Minor changes – those changes that meet the requirements listed in 2.4.1, but do not impact those items listed under “Major changes.”

The MOC Guidelines (Talos-SEMS-2.4-001) provides the work flow chart and guidelines to manage change for the managed facilities.

2.4.5. Reference Documentation

The MOC information is maintained on the SEMS M&H EDMS and SC-EDMS sites. The information is readily accessible through the document control process described in Section 2.13.5 EDMS Document Control Process.

2.5. Operating Procedures §250.1913

Each platform and MODU shall have written operating procedures. The procedures provide instructions for conducting safe and environmentally sound activities in each operation addressed in the SEMS program. Platform-specific procedures can be found under the appropriate facility reference library on the EDMS.

2.5.1. Operating Procedures Content

The procedures shall include the following sections that are consistent with the safety and environmental information, as applicable. Format, content and intended use shall address human factors associated with the interaction between facilities and personnel with the intention to minimize the likelihood of procedural and operational error.

Facility-specific procedures shall be prepared for the following:

- Initial startup
- Normal operations
- Normal shutdown
- Startup following an emergency shutdown
- Consequences of Deviation

General operating procedures shall be prepared for the following:

- All emergency operations
- Bypassing and flagging out-of-service equipment and safety devices
- Chemical hazards, inventory, and control

NOTE: Safe chemical handling details are contained in the Safe Working Practices

- Potential impacts to human and marine environment

Additional resources and referenced recommendations are found within API RP 14J Section 6.6 Operating Procedures.

2.5.2. Operating Procedures Periodic Review

Changes to the operating procedures shall be performed under the MOC process discussed in Section 2.4 Management of Change §250.1912 in this document.

Review of the operating procedures shall be performed in conjunction with the respective facility HA schedule discussed in Section 2.3 Hazards Analysis §250.1911 to ensure that they reflect current and actual operating practices.

2.5.3. Reference Documentation

The operating procedures are maintained on the EDMS. The information is readily accessible through the document control process described in Section 2.13.5 EDMS Document Control Process.

2.6. Safe Work Practices §250.1914

2.6.1. General

SWPs shall be utilized to minimize the risks associated with operating, maintaining and handling materials that could impact safety or the environment. In addition to process and component risk assessments, the human factor shall be considered in the safe work practices.

To support the company in maintaining safe work practice guidelines that apply to multiple locations, the Talos SWP Manual (Talos-COMP-002) shall consist of industry best practices that meet or exceed the recommendations outlined in API RP 76. The Talos SWP Manual shall provide safe work practice guidelines, safety standards, and permit to work instructions that apply to both Talos personnel and contractors where applicable in accordance with the signed bridging documents.

2.6.2. Safe Conduct of Work Activities

The safe work practices shall include items such as:

- Personal Protective Equipment
- Hot work, Safe work
- LOTO
- Vessel and Confined Space Entry
- Electrical Safety
- Pipe or Vessel Purge
- Lifting Operations
- H_2S
- Offshore Safety Transportation
- Well Site Operations
- Offshore SIMOPS
- Communication of Work Activities (Reference SWP Manual Section for Shift Change and Replacement Personnel)

2.6.3. Control of Hazardous Materials

Material specifications, inventories, separation, confinement and handling of toxic materials that can affect safety and environmental protection shall be properly labeled with the quantities along with SDS maintained at the local facility. The SDS documents shall be accessible to all employees and contractors as required.

2.6.4. Contractor Safety and Selection

Contractors will be selected based on information regarding the contractor's safety and environmental performance.

Three methods may be utilized to obtain and review this information.

1. ISN data will be the primary method for evaluating contractor's safety and environmental performance.
2. The Talos Contractor Review and Verification Form (Talos-COMP-007) will be utilized for contractors that are not members of ISN.
3. Audits shall be performed on select companies each year. The audits will include a detailed review of contractors' records to ensure compliance with the bridging document and all associated requirements. At minimum, the audit will review contactor performance in the following areas as applicable to the contractor's scope of supply:
    - Safe work practices
    - Training
    - Skills and Knowledge Assessments
        - Installation, maintenance, and repair of equipment
        - Construction, start up, and operation of Talos Facilities
        - Turnaround Operation
        - Major renovations
        - Specialty Work
4. Companies to be audited will be selected based on man-hours worked for Talos, safety performance measures, and the general nature of the services performed. Contractors providing offshore personnel on a regular rotational assignment will be audited every three years.

All contractors, except for those providing domestic services, shall provide:

- Their own written safe work practices or agree in writing to adopt Talos practices
- Employee training records for contract employees with regular TALOS rotational assignments are reviewed through weekly training record updates. All other contractor training is verified through ISN and/or audits.
- Skills and knowledge assessments will be maintained for contract employees with regular Talos rotational assignments.
- Verification that they are conducting activities in accordance with the Talos SEMS

An approved bridging document will be completed for each approved contractor to ensure compliance with these requirements.

Contractor's status shall be maintained and reviewed on the ISN portal. The information stored on ISN is reviewed to verify the contractor safe work practices, training records, safety performance, and bridging document requirements. Each contractor is assigned a grade based on these parameters as well as MSA insurance requirements. Contractors with a Green or Yellow score require no further action. Contractors with a Red score will require MOC approval by the VP of HSE Any contractors that may have administrative reasons such as MSAs and insurance will require MOC approval through the EVP and Chief Operating Officer.. Approved contractors and their evaluations shall be summarized on the Talos Approved Contractor List (Talos-SEMS-2.6-001). Management approval, through the MOC procedure, will be required for use of contractors not included on the approved list.

2.6.5. Reference Documentation

The safe work practices information is maintained on the Talos SC-EDMS. The information is readily accessible through the document control process described in Section 2.13.5 EDMS Document Control Process. Contractor documents and reviews are maintained on the ISN Website and SC-EDMS systems. SC-EDMS systems are primarily for non-ISN members.

2.7. Training §250.1915

2.7.1. General

In addition to the training required by the Talos 30 CFR §250 Subpart O Program (Talos-COMP-004), Talos personnel will attend training as outlined in the table below:

Personnel	Training	Frequency
All personnel with offshore duties who operate production equipment	Operating Procedures	Self-certification, as issued
All personnel with offshore duties	Emergency Evacuation Plan	Self-certification, as issued
All employees with offshore duties	Safety Manual	Self-certification, as issued
All employees with offshore duties	WGPS Core Training	Annual
All employees with offshore duties	Rigger	4 years
All employees with offshore duties who operate cranes	Crane	4 years
All employees with offshore duties	Firefighting	2 years
All employees with offshore duties	CPR	2 years
All employees with offshore duties on a platform with sour gas production	H_2S Training	Annual
All employees with slickline duties	Well Control	2 years
Talos Operations Staff	Talos SEMS (9 Elements)	Annual

All personnel regularly assigned to offshore facilities shall be trained on the SEMS philosophy and applicable elements. The training shall ensure that all personnel have a complete understanding of the program elements and are fully qualified to carry out their responsibilities and assignments relative to this program. Training shall be provided by qualified personnel in conjunction with existing Subpart O training programs.

SEMS-specific training shall address nine key areas:

1. General SEMS Overview (Element 1)
2. JSAs and Hazard Recognition (Element 3)
3. Operating Procedures (Element 5)
4. Safe Work Practices (Element 6)
5. Emergency Response and Control (Element 10)
6. SWA (Element 14)
7. UWA (Element 15)
8. Employee Participation Plan (Element 16)
9. Reporting Unsafe Working Conditions (Element 17)

For personnel not regularly assigned to Talos facilities, applicable parts of the Talos SEMS program will be covered during the platform orientation and documented on the Employee & Non-Employee Visitor Orientation Checklist (Talos-SEMS-2.7-001).

2.7.2. Initial and Periodic SEMS Training

In addition to training required by 30 CFR §250 Subpart O, initial SEMS-specific training will be provided for all current and future Talos personnel who are regularly assigned to offshore facilities. Refresher training, including drills, will be performed in accordance with the table in Section 2.7.1 of this manual to verify adequate retention of required knowledge and skills.

2.7.3. Communication

The MOC program shall be used to ensure that whenever a change is made in operating procedures, safe work practices or emergency response and control measures, personnel will be trained or otherwise informed of the change before they are expected to operate the facility.

2.7.4. Contractor Training

Talos requires contractors to train their personnel in the work practices necessary to perform their jobs in a safe and environmentally sound manner. In addition, contractors shall develop and implement qualification criteria for operating and maintenance personnel.

Talos shall provide contractors with applicable site-specific training related to this SEMS plan and all rules pertaining to the facility and applicable provisions of the Emergency Action Plan. The site-specific training will be valid for up to one year. During that one year period, any significant changes to the facility will be communicated as appropriate when personnel arrive on the platform.

2.7.5. Training Documentation

Documentation of all training shall be maintained through weekly training updates for employees and contractors with regular rotational assignments. This documentation will cover both Talos employees and contractor verification information. The verification information is documented during the audits described in 2.6.4 Contractor Safety and Selection. Contractor site-specific training is documented on the Talos Visitor Orientation Checklist (Talos-SEMS-2.7-001).

2.7.6. Reference Documentation

The training information is maintained on the Talos SC-EDMS and through weekly training updates. The information is readily accessible through the document control process described in Section 2.13.5 EDMS Document Control Process.

2.8. Assurance of Quality and Mechanical Integrity of Critical Equipment §250.1916

2.8.1. General

Talos applies industry best practices and manufacturer's installation and testing procedures so that critical equipment for company facilities is designed, fabricated, installed, tested, inspected, monitored, and maintained in a manner consistent with field service experts, manufacturer recommendations, industry standards, and BSEE requirements. The same recommendations and standards will be utilized to ensure that adequate spare and replacement parts are available. Human factors regarding equipment accessibility will be considered for operation, maintenance and testing. Contractor-owned critical equipment will be maintained by the contractor per the signed bridging agreement. Verification will be accomplished through contractor audits.

Specifications shall be developed, as needed, for the procurement, fabrication, quality control, quality assurance and installation of critical equipment. An Talos Pre-startup Checklist (Talos-SEMS-2.9-001 or 002) will be utilized, when required by the MOC, to ensure that critical equipment is properly installed prior to start-up. The Talos MOC Procedure shall be utilized, as required, to ensure that modifications of existing equipment and systems are appropriate for their application.

2.8.2. Maintenance

Maintenance of critical equipment shall be performed in a manner consistent with manufacturer recommendations and/or industry standards.

- Maintenance personnel will be trained in the application of the procedures, relevant hazards, and safe work practices.

2.8.3. Testing and Inspection

Testing, inspection, calibration, and monitoring of critical equipment is performed and documented using technologies and procedures required for environmental compliance and monitoring. The Talos SEMS program includes the following:

- A list of critical equipment and systems subject to inspection and testing (Talos-SEMS-2.8-004)
- Documentation of the completed testing and inspection data which is maintained in the SEMPCheck database
- In-place structural surveys that are performed in accordance with API RP 2A-WSD. Documentation of these surveys is maintained by and with Oceaneering Inspection Division. Reports are available to designated Talos personnel on an Oceaneering website
- Operating procedures that instruct facility operators to perform routine monitoring of production to ensure safe operations and environmental compliance
- Inspection reports for pressure vessels, piping, and tanks that are performed in accordance with the Talos Inspection Guidelines (Talos-SEMS-2.8-012). Documentation of these surveys is maintained by and with Oceaneering Inspection Division. Reports are available to designated Talos personnel on an Oceaneering website.

- All inspection reports and forms shall include the following:
  - The date of the inspection or test
  - Name and position
  - Signature of the person that performed the inspection or test
  - Serial number or other identifier of the equipment for which the inspection or test was performed
  - Description of the inspection or test performed
  - Results of the inspection test

For MODU-specific critical equipment, job specific testing and inspection requirements will be developed by the contractor for each drilling program prior to commencing offshore operations.

2.8.4. Reference Documentation

The QA and mechanical integrity information is maintained on the Talos M&H-EDMS and other appropriate systems. The information is readily accessible through the document control process described in Section 2.13.5 EDMS Document Control Process.

2.9. Pre-Startup Review §250.1917

For new and significantly modified facilities, when modifications necessitate a change to process safety information, certain important considerations must be addressed before startup. A pre-startup review shall be completed to confirm the following:

- Construction and equipment are in accordance with design specifications.
- Safety, operating, maintenance, environmental, and emergency procedures are in place and adequate.
- For new or significantly modified facilities, a HA is performed and recommendations are resolved or implemented, as appropriate.
- Training of operating personnel has been completed.
- Programs to address management of change and other elements of this document are in place.
- SWP Manual is available at the facility.

The GOM Pre-Start-up Checklist will be completed prior to start-up of any new facilities or major modifications to existing facilities. The Pre-Post Inspection Checklist will be completed prior to resuming operations after hurricane evacuations, major well work-overs, drilling operations or similar activities. All responses will be agreed to and reviewed by the Production Foreman.

Paper copies of the relevant documents will be maintained on the installations or at operating offices.

2.9.1. Platform Removal and Pipeline Decommissioning Checklists

Prior to commencing platform removals or pipeline decommissioning activities, the appropriate checklist shall be completed. The checklist is designed to ensure that all contractors and company representatives are fully aware of all applicable policies and procedures. The HA and any potential hazards shall be reviewed and discussed. In addition, the bridging document shall be reviewed. The Talos Guidelines and Procedures provide directions in the Pre-Job Checklist for Platform Removal Form Talos-SEMS-2.9-003.

2.9.2. Reference Documentation

The pre-start-up review information is maintained on the Talos M&H-EDMS. The information is readily accessible through the document control process described in Section 2.13.5 EDMS Document Control Process.

2.10. Emergency Response and Control §250.1918

2.10.1. General

The Talos EEP and OSRP protect the health, safety, and lives of people at the facility, as well as minimizing business losses related to damage to property and the environment.

All personnel working on offshore installations must be prepared to respond safely and effectively to emergencies. Procedures and drills shall address the readiness of personnel in the use of emergency guidance when responding to various emergencies at the facility. The plan will be validated by drills carried out in accordance with the SEMS training program (Section 2.7).

2.10.2. Emergency Evacuation Plan

The EEP and OSRP assign authority and responsibility to the appropriate qualified person(s) for specific responses to emergencies that Operations may encounter. The EEP and OSRP shall address emergency reporting requirements and shall comply with all applicable government regulations.

2.10.3. Emergency Control Center

Talos shall designate one or more emergency control stations for each facility with access to the Emergency Evacuation Plan, OSRP, and other safety and environmental information required.

2.10.4. Training and Drills

Training and drills incorporating emergency response and evacuation procedures shall be conducted every three years for all personnel on the facility as required by the SEMS training program. All facility personnel shall know the location and contents of the Talos EEP for the respective facility. Drills shall be conducted for manned facilities to identify and correct deficiencies as appropriate. All drills shall be recorded and critiqued on the Emergency Drill Form Talos-SEMS-2.10-004.

2.10.5. Reference Documentation

The emergency response information is maintained on the Talos SC-EDMS. The information is readily accessible through the document control process described in Section 2.13.5 EDMS Document Control Process.

2.11. Incident Investigation §250.1919

2.11.1. General

Incident reporting and investigation are important tools for identifying and controlling potential safety hazards. The purpose of these activities is to learn from the incident and help prevent similar incident occurrence. Talos has established a procedure for reporting and investigation of all incidents that are determined by facility management or BSEE to have possessed the potential for serious safety or environmental consequences.

2.11.2. Investigation

Incident investigations must be initiated as soon as possible with regard to securing the incident scene and protecting people and environment. The incident investigation will be conducted by personnel knowledgeable in the process involved, investigation techniques, and other special talents that are relevant or necessary.

The Talos investigation of an incident addresses the following:

1. The nature of the incident;
2. The factors (human or other) that contributed to the initiation of the incident and its escalation/control; and
3. Recommended changes identified as a result of the investigation.

2.11.3. Follow-Up

Talos has a corrective action follow-up program incorporated into the incident investigation procedure that is based on the findings of the investigation in order to analyze incidents. The investigation will be expedited and findings, along with recommendations, resolved in a timely manner.

The corrective action program is based on the findings of the investigation in order to analyze incidents for common root causes. The corrective action program:

1. Retains the findings of investigations for use in the next hazard analysis update or audit;
2. Determines and documents the response to each finding to ensure that corrective actions are completed; and
3. Implements a system whereby conclusions of investigations are distributed to similar facilities and appropriate personnel within the Talos organization.

Refer to the Incident Investigation procedure referenced for reporting and notification requirements.

2.11.4. Reference Documentation

The incident investigation information is maintained within the SEMPCheck IRT Module. The information is readily accessible to authorized individuals on the SEMPCheck website.

2.12. Audit of SEMS Elements §250.1920

2.12.1. General

Talos shall utilize an ASP to perform periodic audits of the SEMS in order to determine if the program elements have been properly implemented and maintained.

Talos will commit sufficient resources to the audit in order to meet its intended scope.

2.12.2. Audit Scope

The comprehensive audit will be comprised of all seventeen elements of the Talos SEMS program to evaluate compliance with the requirements of this subpart and API RP 75 and to identify areas needing improvement that impact safety and environmental performance.

The scope of the audit shall:

1. Determine if the management program elements are in place.
2. Determine if the management program elements incorporate the required components.
3. Test the system to evaluate the effectiveness of the management program.
4. Identify areas of potential improvement in the safety and environmental management program.

The audit process must also meet or exceed the criteria in Sections 9.1 through 9.8 of “Requirements for Third-Party SEMS Auditing and Certifications of Deepwater Operations” COS 2-03 or its equivalent.

2.12.3. Audit Coverage

When selecting facilities to audit, consideration will be given to common features to obtain a cross-section of practices for the facilities operated.

The testing system of the audit need not apply to each facility. Interviews and inspections will be conducted at fields that differ significantly. This should include a number of facilities sufficient to evaluate management’s commitment to the items in 2.12.2.

During each audit, at least 15 percent of the fields operated, with a minimum of one facility, will be audited. The facilities audited will be different from those included in previous audits. When sufficient deficiencies are identified in the effectiveness on any SEMS element(s), the test sample size should be expanded for that program element.

2.12.4. Audit Plan

Prior to an audit, a written audit plan shall be developed. The plan includes the following information as applicable to the specific audit:

- Audit objectives and scope
- Audit criteria
- Identification of the ASP
- Identification of the facilities to be audited
- Identification of the program elements to be audited
- Procedures to be used in the audit
- Confidentiality requirements
- Expected date of issue and distribution of the audit report

The written Audit Plan must be submitted to BSEE at least 30 days before the audit. Talos understands that the BSEE reserves the right to modify the list of facilities that Talos proposes to audit.

2.12.5. Audit Frequency

The SEMS will be audited at least every three years.

2.12.6. Audit Team

Effective 6/5/15, Management will select an ASP that is accredited by a Regulatory Agency-approved AB. The audit team lead must be an employee, representative or an agent of the ASP, and must not have any affiliation with Talos. The audit will be conducted by one or more persons knowledgeable in the process involved and other specialties deemed necessary. Care should be exercised when selecting the audit team to ensure impartiality.

2.12.7. Audit Report

The audit team shall prepare an audit report. The topics to be addressed in the audit report will be those determined in the audit plan. The report shall contain the audit findings and be signed and dated by the audit team. The auditor must submit an audit report of the findings and conclusions of the audit to BSEE within 60 days of the audit completion date. The report must outline the results of the audit, including any deficiencies identified.

The Audit Report shall also include a copy of the audit plan (2.12.4) and the following information:

- Period covered by the audit and the date(s) the audit was conducted
- Distribution list for the audit report
- Summary of the audit process, including any obstacles encountered
- Audit findings and conclusions, such as whether the program element(s) is properly implemented and maintained

The findings and conclusions of the audit will be provided to management responsible for the SEMS. Talos shall provide the regulatory agencies a copy of the Corrective Action Plan for addressing the deficiencies identified in the audit within 60 days of completion of the audit. The plan shall include a proposed schedule to correct the deficiencies identified in the audit and the name and job title of the person responsible for correcting each identified deficiency.

2.12.8. Reference Documentation

Audit reports will be maintained in the SEMS general library on the Talos SC-EDMS.

2.13. Records and Documentation §250.1928

2.13.1. General

SEMS documents and records are maintained in a manner sufficient for the SEMS implementation. All SEMS records and documentation shall be dated with revision history readily identifiable.

2.13.2. Documentation

Throughout SEMS, various elements describe documentation requirements. In addition to those requirements, sufficient documentation exists within the SEMS to describe the core elements of the program and interaction between elements.

2.13.3. Records

SEMS-related records shall be stored on file at the applicable facility and/or be available on the Talos EDMS.

2.13.4. Record and Document Control

Electronic copies (native, originals) will be maintained in the Talos EDMS. Talos centralized EDMS shall host documentation and records that are accessible via the internet. All SEMS related information not being managed through other services shall be maintained and accessible on the EDMS. Paper copies of the relevant documents will be maintained on the installations or operating offices. Updates will be issued as required or through the MOC process.

Talos SEMS record and document control includes the following considerations:

1. Located and maintained in an orderly manner.
2. Readily retrievable and protected against damage, deterioration, or loss.
3. Periodically reviewed, revised as necessary, and approved for adequacy by authorized personnel.
4. Current versions of relevant documents are available at locations where SEMS elements are performed.
5. Retained for the specified periods of time.
6. Obsolete documents are promptly removed from all points of issue and points of use or otherwise assured against unintended use.
7. Any obsolete documents retained for legal and/or knowledge preservation purposes are suitably identified.
8. Confidential records and documentation are identified and properly handled.

Records and documents for each SEMS element are to be maintained as follows:

ELEMENT	DURATION
Safety and Environmental Information	Duration of installation
JSAs/SWA (except MODUs)	Minimum 2 years on location
JSAs/SWA (MODUs)	On MODU while on location, in Talos Houston offices minimum of 2 years
HA	Duration of installation
MOC	Minimum 2 years
Operating Procedures	Duration of installation
SWP	Permanent
Training	Minimum 5 years
Quality Assurance and Mechanical Integrity of Critical Equipment	Duration of installation
Pre-Startup Review	Duration of installation
Emergency Response	Duration of installation
Incident Investigation Reports	Minimum 5 years
Injury and/or Illness Log	Minimum 2 years
SEMS Audit Reports	Minimum 6 years
EEP Documentation	Minimum 2 years
Reports of Unsafe Work Conditions	Minimum 6 years

2.13.5. EDMS Document Control Process

The EDMS is managed under the Talos document management system as follows:

1. Access to the EDMS portal by any Talos personnel or contractor designees shall be to view “Uncontrolled” PDF print documents only.
2. Only the MOC Coordinator can check out a Master “controlled” document for revision.
3. Talos Engineering must approve all document revision or replacement.
4. Only the MOC Coordinator can check-in the approved document back into the EDMS.

2.13.6. Reference Documentation

The following records and documentation information is maintained on the Talos EDMS or other designated locations. The information listed is readily accessible through the document control process described in Section 2.13.5 EDMS Document Control Process.

Talos Records & Documentation Information	
Document No.	**Description**
Talos-SEMS-2.13-001	Document Register

2.14. Stop Work Authority §250.1930

The Talos SWA procedures provide all Talos personnel and contractors with the responsibility and authority, without fear of reprisal, to stop activities or decline to perform an assigned task that pose as an imminent danger, risk or threat to people or the environment.

2.14.1. SWA Procedure

The detailed procedure for initiating SWA is established in the Talos Safety Manual. SWA applies to all imminent risks or dangers that could be reasonably expected to cause death or serious physical harm to personnel or significant environmental harm to land, air, mineral deposits, marine, and coastal environments or the human environment.

2.14.2. SWA Implementation

The PIC is responsible for ensuring that work is stopped in an orderly and safe manner. Once an individual is notified to stop, immediate compliance is mandatory. Failure to comply with an SWA order can lead to removal from the jobsite and/or termination.

2.14.3. Work Resumption

The SWA event must be documented, as soon as practicable, by the UWA. Work may only resume when the UWA determines that the imminent risk or danger does not exist or no longer exists. The decision to resume operations will be documented in the SEMPCheck Incident Reporting Tool.

2.14.4. SWA Training

To ensure consistent application of SWA across the Talos GOM Facilities, the following steps will be taken:

1. A standard SWA statement is included on all Talos JSA Forms, beginning with Revision 1.
2. When not contained on contractor JSAs, Talos personnel shall discuss and document SWA on contractor JSAs.
3. SWA Procedures training will be included on the Talos Visitor Orientation Checklist, beginning with Revision 2.
4. SWA procedures will be reviewed during all meetings focused on safety at Talos facilities covered by SEMS.

2.15. Ultimate Work Authority §250.1931

Talos utilizes a UWA program to designated the individual position with final authority to make decisions regarding the proper actions to provide for the health and safety of individuals, the public and the environment.

2.15.1. General

All applicable USCG regulations will be taken into account in order to identify the individual position with final responsibility for making decisions.

2.15.2. Process

1. UWA Designation for Production Facilities
   - Talos identifies the Facility PIC as the individual designated to have UWA.
   - For work being performed on an unmanned facility that normally does not have a PIC onsite, the PIC of the task is designated as the individual with UWA and should be identified on the Job Safety Analysis (JSA). All personnel assigned to the task shall be notified of the designated individual with UWA during the JSA review.
   - In the event that multiple facilities including a MODU, are attached and working together or in close proximity to one another, the Drilling PIC on the MODU will have UWA over the entire operation, including all facilities.
2. UWA Designations for MODUs
   - Only a single individual will have UWA at any given time. Consideration must be given to all applicable USCG regulations that deal with designating a PIC of the MODU or floating facility.
3. Responsibilities of UWA
   - The individual designated as the UWA is responsible for assuring the SEMS program is implemented on the facility(s), in a manner that addresses personnel safety and environmental protection.
   - If SWA is exercised, then the individual designated as the UWA is responsible for determining if the imminent risk or danger does not exist or no longer exists, and has final say as to whether the work may be resumed.
   - If an emergency occurs that creates an imminent risk or danger to the health or safety of an individual, the public, or the environment; then the individual designated to have UWA is authorized to pursue the most effective action necessary for mitigating and abating the conditions or practices causing the emergency.

4. Notification
    - Personnel shall be notified during the facility orientation who is designated as the Facility PIC.
    - If during operations the UWA responsibility shifts to a different individual, it is required that personnel be verbally notified.
    - Placards are required to be posted in the galley and the control room identifying the individual designated as having UWA. Placards must be updated any time UWA designation changes.

2.15.3. Training

All personnel either performing work, or visiting Talos facilities will be trained on the UWA program during the site-specific orientation when arriving for the first time.

All personnel shall be re-trained when any changes occur to this element.

2.15.4. Recordkeeping

Any time SWA is exercised, the decision made by the designated individual with UWA to resume activities shall be documented on the Talos SWA Form.

2.16. Employee Participation Plan §250.1932

The Talos SEMS Plan is developed, implemented and modified through an interactive dialogue between Talos management, office staff and field operations personnel.

Interaction between disciplines occurs in several ways:

1. Talos created the Safety and Compliance (S&C) Foreman position as part of the initial SEMS Plan development. These individuals are experienced Talos employees who previously served in field leadership positions. They continue to work in an offshore rotational assignment to gather input and assist Talos field operations personnel in the daily implementation of our SEMS Plan.
2. Foremen's meetings are held three to four times per year. SEMS Plan development, implementation, and modification are included as agenda items to be discussed in each meeting. Operations personnel provide feedback on the effectiveness of the Plan.
3. Office engineering and regulatory staff review and provide feedback to the SEMS Manager on the SEMS Plan.
4. Operations field-staff (foremen and PICs) contact the SEMS Manager directly by email and telephone to discuss issues as they occur.

All Talos operations personnel, in the office and the field, have direct access to the SEMS Plan through both hardcopy and EDMS access. A weekly email is distributed to all operations personnel providing a notification of any SEMS policy, procedure or forms updates.

2.17. Reporting Unsafe Working Conditions §250.1933

The Talos SEMS program includes procedures for all personnel to report unsafe working conditions. All personnel either performing work or visiting Talos facilities will be made aware of their ability to report possible violations or observations of unsafe working conditions.

2.17.1. Procedure

Any personnel that observe an unsafe working condition or possible violation will exercise the Stop Work Authority (SWA) and the Ultimate Work Authority (UWA) programs. In all cases, the Talos PIC should be made aware of unsafe conditions or possible violations immediately so that any necessary mitigation measures can be started.

Offshore personnel have several options for reporting issues on Talos' platforms. These options in order of preference are:

1. Notify the PIC for the facility.
2. Notify the Production Foreman for the area.
3. Notify the S&C Foreman for the area.
4. Notify the Production Superintendent in Dulac, LA.
5. Notify the Operations Manager in Houston, TX.
6. Contact the Talos Hotline.
7. Contact BSEE or USCG.

Issues should only be escalated to the next level when the individual is not satisfied with the response given to them.

A notice containing the following information will be posted in the galley and the control room of each platform. The notice is not required on caissons or other similar structures that do not contain a building or shelter.

1. Reporting Possible Violations to BSEE:
   a. Any person may report to BSEE any hazardous or unsafe working condition on any Talos facility, and any possible violation or failure to comply with any:
      - Provision of the Act,
      - Provision of a lease, approved plan, or permit issued under the Act,
      - Provision of any regulation or order issued under the Act, or
      - Any other Federal law relating to safety of offshore oil and gas operations.
        - To make a report under this section, a person is not required to know whether any legal requirement listed above has been violated.
        - Reports should contain sufficient credible information to establish a reasonable basis for BSEE to investigate whether a violation or other hazardous or unsafe working condition exists.
   b. To report hazardous or unsafe working conditions or a possible violation, Contact BSEE by:

- Phone at 1-877-440-0173 (BSEE Toll-free Safety Hotline),
- Internet at www.bsee.gov, or
- Mail to: U.S. DOI/BSEE
  1849 C Street NW., Mail Stop 5438
  Herndon, VA 20240
  Attention: IRU Hotline Operations
- Items to include in the report:
  - Name, address and telephone number should be provided if you do not want to remain anonymous;
  - The specific concern, provision or Federal law, if known, referenced above that a person violated or with which a person failed to comply; and
  - Any other facts, data and applicable information

2. BSEE Investigations
   a. When BSEE receives a report of a possible violation, or when a BSEE employee detects a possible violation, a representative will investigate according to BSEE procedures and notify any other Federal agency(s) for further investigation, as appropriate.
   b. BSEE investigations of possible violations may include:
      - Conducting interviews of personnel;
      - Requiring the prompt production of documents, data, and other evidence;
      - Requiring the preservation of all relevant evidence and access for BSEE investigators to such evidence; and
      - Taking other actions and imposing other requirements as necessary to investigate possible violations and assure an orderly investigation.
   c. When a possible violation is reported, BSEE will protect a person's identity to the extent authorized by law.
3. Reporting Unsafe Working Conditions to USCG
   a. Any person may report a possible violation of any USCG regulation or any other hazardous or unsafe working condition on any marine unit (vessel, MODU, etc.) engaged in OCS activities to the Officer in Charge, Marine Inspection Unit 8, located in New Orleans, LA.
   b. After reviewing the report and conducting any necessary investigation, the Officer in Charge, Marine Inspection, will notify the owner or operator of any deficiency or hazard and initiate enforcement measures as the circumstances warrant.
   c. The identity of any person making a report under paragraph (a) is not made available, without the permission of the reporting person, to anyone other than those officers and employees of the Department of Transportation who have a need for the record in the performance of their official duties.
4. Contact USCG by:
   - Officer in Charge, Marine Inspector
   - Phone: 504-671-2150

2.17.2. Training and Notification

The Talos Employee and Non-Employee Visitor Orientation Checklist shall be utilized to train all personnel either performing work or visiting Talos facilities on the Reporting Unsafe Work Conditions process.

2.17.3. Recordkeeping

All documentation related to BSEE investigations due to a report of an unsafe work condition or violation will be retained through the Talos SC-EDMS for at least six years.