

Operators, contractors are key to WellCAP success

IADC'S WELL CONTROL Accreditation Program (WellCAP) has entered an important new phase. The program is poised to fill the void created when the **US Minerals Management Service (MMS)** steps out of its traditional role of approving well control schools in the US.

MMS published new Subpart O training rules in October 2000 that began a two-year transition period to a new era of "performance based" regulations. Effective 15 October, 2002, MMS will leave its prescriptive role, passing the bulk of responsibility for providing training and evaluating employee competency to oil company lessees and their contractors.

While this will provide operators with a welcome increase in flexibility, some in the industry were quick to point out problems if individual producers adopt different training requirements for their contractors. The MMS acknowledged this possibility when it published the final rule, though it expressed confidence that industry would resolve this potential problem on its own.

COOPERATION THE KEY

As the result of concerted efforts throughout this year on the part of operators, drilling contractors and IADC, WellCAP has emerged as the benchmark standard for contractors and operators alike. First implemented in 1995, WellCAP is the only industry-developed training standard for well control, and has an established infrastructure in place to serve the industry.

MMS regulations have the largest effect on the industry in the intensely active Gulf of Mexico, where many operators and contractors have ventured into increasing deeper water off the Outer Continental Shelf (OCS). There, a key industry group is the Offshore Operators Committee (OOC), comprised of both major and independent producers that drill in the Gulf.

IADC has a long tradition of cooperation with OOC, including joint development of the IADC Deepwater Well Control Guidelines in 1998 and a study on preventing unplanned riser disconnects last year.

Earlier this year, OOC discussed strategies for complying with the upcoming regulations in a manner that would be most efficient and productive for the industry. The meetings were organized by **Will Pecue**, Well Engineering Operations Manager for **ChevronTexaco's** Eastern Gulf Of Mexico Shelf and Chairman of the OOC's Drilling Technical Subcommittee.



Both meetings featured presentations on the development and operation of WellCAP, given by **Steve Kropla**, IADC's Director of Accreditation & Certification Programs. Mr Kropla noted that WellCAP was originally designed to address training needs in non-regulated areas of the world. Though modeled in part on the structure used by MMS, at the time of its development it was not anticipated that it would receive widespread application in the US. When MMS decided to discontinue approving well control schools, that move provided an opportunity for WellCAP to fulfill this role and for IADC to promote a truly global well control training standard.

"When you look at what Subpart O requires and the implications on the contractor community if the operators' training programs are not aligned," said Mr Pecue, "the results could be unmanageable. Fortunately, the drilling Subpart O well control requirements fit perfectly with the IADC WellCAP initiative.

"Within the OOC specifically, most of the member operators recognize IADC's efforts in producing and operating a true worldwide standard for training.

"By having the OOC members agree in principle to use WellCAP as the benchmark standard for the qualification of contractors, there is now a unified and worldwide training option available that will suffice for the majority of Gulf of Mexico and OCS operators."

Mr Pecue added: "The OOC also recognizes that the deepwater well component will be a valuable addition to the WellCAP program."

IADC's Well Control Committee drafted a deepwater WellCAP curriculum and submitted it for industry comment in June 2001. Comments are currently being reviewed and it is anticipated a final curriculum—possibly an enhancement of WellCAP's existing subsea curriculum—will be delivered by the end of the year.

The Deepwater Curriculum is the latest of several curriculum guidelines added by WellCAP to not only equal but to exceed those in place under existing MMS regulations, Mr Kropla said. These include curricula issued this year for coiled tubing, snubbing and wireline operations, and underbalanced operations.

SUPPORT FOR WELLCAP

At an industry meeting in August, many OOC members discussed drafts of their Subpart O compliance plans. All operators presenting plans referenced WellCAP as a minimum standard for the contractor employees. And while some operators intend to develop internal programs to take advantage of the flexibility offered by the new regulations, all stated WellCAP would be used as a starting point for their own engineers and consultants.

"One key thing WellCAP provides is a standard for the industry," said **Ed Scott**, Drilling Consultant for **BP**. Scott is in charge of coordinating BP's compliance efforts with Subpart O. "IADC is providing a beneficial service in developing a standard for the industry. The majority of operators will probably utilize WellCAP in their plans for their own employees because they see some really big advantages in using a program administered by an independent organization within the industry."

Operator support of WellCAP will include providing support for the program's administration by assisting IADC with site visits to audit and measure compliance of accredited schools.

This may help alleviate the concerns expressed by some operators regarding inconsistency of training quality.

In addition, some OOC members have expressed the idea that IADC might provide an additional service by developing a WellCAP component designed especially for use by operators.

Although the concept of an "advanced" WellCAP curriculum had been previously discussed within the Well Control Committee, a program of this type specific to the needs of operators was first raised at the committee's meeting in October. There, **Jim Metcalf**, Drilling Team Leader with **Newfield Exploration**, raised the issue of what he termed "WellCAP Plus."

"I'd like to see if the operators are interested in working with IADC in generating that type of program," Metcalf said.

"What initially made me think of this were some of the comments I've heard as feedback from well control training. Many of the basic classes have students ranging from completely inexperienced to very experienced, from assistant drillers to company men and engineers.

"When this happens, the schools tend to focus on the lowest common denominator, and enough attention may not be given to some higher-level type issues. There might be a need for a specific higher-level curriculum which could include such things as well design and planning issues and their relevance to kick tolerance."

The American Petroleum Institute has also acknowledged the value of IADC's accreditation programs by referencing both WellCAP and its companion program, RIG PASS, in its Recommended Practices (RPs). This includes the recently revised RP 64, "Recommended Practice for Diverter Systems, Equipment and Operations," and RP 59 "Recommended Practice for Well Control," currently being revised. RP 59 will also reference the IADC Deepwater Well Control Guidelines.

Operators are currently facing a dilemma because there is no WellCAP counterpart for the other key part of their

"MMS commends IADC for the WellCAP program and acknowledges the value WellCAP could bring in providing minimum well control training requirements to lessees and contractors worldwide."

MMS

business, production operations. Because of this void, MMS has said it is preparing new proposed rules, that will allow it to resume the practice of approving training facilities.

This proposal has raised eyebrows in the industry among those who feel it directly contradicts MMS's stated intention of using "performance based" regulations.

Depending on the specifics of the proposed rules when published, industry groups such as IADC and API may question regulations that would restore MMS to its previous prescriptive role.

For its part, API's Executive Committee on Drilling and Production Operations recently approved development of a business plan for a system that would approve providers of Production Safety Systems Training (PSST).

Evaluation and approval of providers would be done in accordance with API's newly revised T-2.

Tim Sampson of API said that for his organization to undertake such a program, the business plan would need to show that it would be capable of covering its own operating costs.

IADC has indicated its willingness to assist API in developing a WellCAP-like system for PSST, including the possibility of sharing resources for administration and record keeping purposes.

ISSUES REMAIN

Mr Kropla said operators and contractors alike still have several issues to sort out prior to October 2002. "Certain questions remain regarding exactly what type of documentation MMS will require for training and competency testing," he said.

"Then there are also questions about how the new regulations will be applied

by field inspectors. Once we know more about these, we'll be able to focus our efforts to make sure everything in place when the new rules take effect."

Some of those issues are likely to be discussed in a Subpart O Compliance Panel to be presented at IADC's next Health, Safety, Environment & Training Conference in Houston 5-6 February, 2002.

MMS has strongly supported IADC's efforts in the past, including development of the IADC Deepwater Well Control Guidelines and the unplanned disconnect report done in conjunction with OOC members.

When the new Subpart O rules were published in August 2000, the following appeared in the Federal Register: "MMS commends IADC for the WellCAP program and acknowledges the value WellCAP could bring in providing minimum well control training requirements to lessees and contractors worldwide."

IADC is also working to assure the acceptance of WellCAP in areas such as the **US Coast Guard's** Offshore Installation Manager certification requirements and Alaska's oil and gas regulations, where requirements for "MMS approved" well control training exist.

Nearly 50 schools worldwide are currently accredited or pending accreditation by IADC. As of 1 Oct, 2001, more than 30,000 WellCAP certificates had been issued since the program started. That number will increase significantly as WellCAP becomes more important in the US. WellCAP instruction is given in 151 locations in 44 countries in English, Spanish, French, Portuguese, Chinese, Japanese, Russian and Bahasa Indonesian.

In comparison, MMS currently has 24 schools approved to provide well control training, along with 6 schools approved to provide both well control training and PSST. There are 25 schools approved to teach PSST only.

More information on IADC's WellCAP program and the companion RIG PASS program for safety orientation can be found on IADC's web site at <http://iadc.org>. Latest curriculum guidelines and other documents pertaining to WellCAP criteria and procedures can be downloaded in PDF format.

WellCAP and RIG PASS are registered trademarks of IADC.