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## Contractor and Subcontractor Safety and Environmental Requirements and Guidelines

### Purpose

The purpose of this program is to establish the safety requirements for contractors to be able to work on Fieldwood owned or managed properties. The objectives of this policy are to ensure that all personnel working on Fieldwood facilities/work sites are adequately skilled and knowledgeable to safely perform their assigned job task functions, to ensure that safety and environmental policies have been established and ensure that contractor's management is committed to safety.

Fieldwood Energy has developed very specific requirements that pertain to all contractors, and their employees, that perform work offshore for Fieldwood Energy.

This document is intended to provide guidance on what is required by Fieldwood and how to become compliant.

### **Mandatory Requirements:**

#### **ISNetworld**

All Contract companies that perform work on-site for Fieldwood Energy **MUST** have an active subscription to ISNetworld and their ISN account must be maintained and remain in compliance with Fieldwood Energy requirements at both the company level and employee level. In order to establish an ISN account, or to obtain additional information about ISNetworld, please contact ISNetworld directly at (214) 303-4900 and/or visit their website at [www.isnetworld.com](http://www.isnetworld.com).

#### **DISA**

All Contract companies that perform work on-site for Fieldwood Energy **MUST** have an active subscription to DISA, and all of their company employees that perform work offshore on any Fieldwood facility or job site **MUST** be enrolled, and in good standing, within an appropriate DISA Drug Testing **Consortium** (Example: EPCC, EPCCA, PHMSA, etc.). Be advised that DISA Corporate drug testing policies do not meet this requirement as they are not included as part of a consortium. For more information about DISA, or to establish an account, please contact DISA directly at (800) 752-6432 or (281) 673-2400 and/or visit their website at [www.disa.com](http://www.disa.com)

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## **SEMS Agreement and Expectations Document**

All contract companies performing work for Fieldwood Energy **MUST** have a properly executed copy of the Fieldwood Energy SEMS Agreement and Expectations document uploaded into their ISNetworld account. This agreement outlines Fieldwood's expectations regarding the Contractors responsibilities in complying with the Fieldwood Energy SEMS Plan as required by Federal Regulations.

## **Master Service Agreement (MSA) and/or other Contract**

All contract companies must have a valid MSA or Contract in place with Fieldwood Energy, LLC before any work can be performed. In order to qualify and become eligible to obtain a MSA or Contract with Fieldwood Energy, the Contractor must fulfill **ALL** of Fieldwood Energy's Contractor requirements as outlined within this document and Exhibit D of the MSA. Fieldwood Energy's Contractor requirements will be monitored by various electronic and manual methods utilizing ISNetworld, DISA and other methods and personnel within the Fieldwood Energy, LLC organization.

## **Insurance**

All Contractors must meet any and all Fieldwood Energy, LLC specified insurance requirements before any on-site work may begin.

## **Compliance Guidelines:**

### **ISNetworld**

Fieldwood Energy utilizes ISNetworld to assist in evaluating and grading all Fieldwood Energy Contractors and prospective Contractors on a company level, as well as helping to ensure the eligibility of all contract employees performing work for Fieldwood Energy on an individual basis. A grading and eligibility criterion has been established by Fieldwood Energy Management. Contractors must request that Fieldwood Energy connect their ISNetworld account to the appropriate Fieldwood Energy ISN account listed below:

- **Fieldwood Energy ISN account** – This account is for all active Fieldwood Energy contractors that are providing offshore services to Fieldwood Energy. These contractors must comply with all requirements contained in this document.

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- **Fieldwood Energy Prequalification ISN account** – This account is for any and all contractors seeking to do work for Fieldwood Energy, but have not yet obtained an MSA or Contract with Fieldwood Energy. By linking to this account, it will allow the contractor to view their grade, and evaluate their status, while waiting on the MSA or Contract. These contractors are not yet eligible to obtain work from Fieldwood Energy! Once an MSA or Contract is obtained, they will be transferred to the active Fieldwood Energy ISN account.
- **Fieldwood Energy Subcontractor ISN account** – This account is for all subcontractors. For the purposes of this document, a subcontractor is described as a company that will perform work on a Fieldwood Energy offshore job-site or lease, but has been hired and will be paid by another direct Fieldwood Energy contractor. All *subcontractors must meet every requirement contained in this document, except the requirements to have an executed MSA or Contract directly with Fieldwood Energy and an executed SEMS Agreement with Fieldwood* as these subcontractors will be working for the contractor that has hired them and will be responsible for them.

### Contractor Safety Performance Grading

Points toward a Contractor’s overall Company dashboard grade are obtained as follows:


- **Safety Grade (ISN Questionnaire) – 0 to 30 points maximum**
  - Contractors must answer all of the questions on the ISN questionnaire when setting up their account and make any changes as necessary, or appropriate, as things may change.
- **Review & Verification of Safety Programs (RAVS) – 0 to 40 points maximum**
  - Contractors must upload all of the required safety programs into ISNworld and request a review by ISN to determine if the uploaded programs meet the applicable requirements for each program. What programs are required by each contractor is determined by the type of work each contractor states they provide on the ISN questionnaire. A Contractor may request an exemption from any program they feel does not apply to their line of work. However, the request for an exemption must be made through the ISNworld system and the ultimate decision as to whether or not an exemption is granted will be made by Fieldwood Energy.
- **DART Rate – 0 to 20 points maximum**
  - Contractors are required to update their accident/incident data at the end of each calendar quarter. This is accomplished by submitting their OSHA 300 forms and man-hours worked to ISNworld. DART Rates are calculated based on the information submitted to ISN. Failure to submit updated information within 30

days of the end of each calendar quarter automatically result in the Contractors overall dashboard grade being dropped to an “F” until the updated information is provided.

- **TRIR Rate – 0 to 10 points maximum**

- Contractors are required to update their accident/incident data at the end of each calendar quarter. This is accomplished by submitting their OSHA 300 forms and man-hours worked to ISNetworld. TRIR is calculated based on the information submitted to ISN. Failure to submit updated accident information within 30 days of the end of each calendar quarter automatically result in the Contractors overall dashboard grade being dropped to an “F” until the updated information is provided.

<b>MSQ (Safety Questionnaire) Score</b>	<b>Possible Points</b>
<b>Exceptional</b>	<b>30</b>
<b>Satisfactory</b>	<b>20</b>
<b>Marginal</b>	<b>10</b>
<b>Unsatisfactory</b>	<b>0</b>
<b>RAVS (Written Safety Programs) Score</b>	<b>Possible Points</b>
<b>90.00 - 100.00</b>	<b>40</b>
<b>80.00 - 89.99</b>	<b>30</b>
<b>70.00 - 79.99</b>	<b>20</b>
<b>60.00 - 69.99</b>	<b>10</b>
<b>0.00 - 59.99</b>	<b>0</b>
<b>DART Rate</b>	<b>Possible Points</b>
<b>0 - .59</b>	<b>20</b>
<b>.60 - 1.00</b>	<b>10</b>
<b>1.01 - 1.50</b>	<b>5</b>
<b>1.51 - 2.00</b>	<b>0</b>
<b>&gt; 2.00</b>	<b>-10</b>
<b>Total Recordable Incident Rate (TRIR)</b>	<b>Possible Points</b>
<b>0 - .99</b>	<b>10</b>
<b>1.00 - 1.99</b>	<b>8</b>
<b>2.00 - 2.99</b>	<b>6</b>
<b>3.00 - 3.49</b>	<b>0</b>
<b>&gt; 3.50</b>	<b>-10</b>

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Based on the above criteria, all Fieldwood Energy Contractors are graded “A” thru “F” within the ISNetwork system. (Be advised that Fieldwood Energy’s grading criteria is subject to change at any time at the sole discretion of Fieldwood Energy, LLC.) **NOTE:** Prospective Contractors must contact Fieldwood Energy and request to have their ISN account connected, or linked, to Fieldwood Energy’s ISN account in order to obtain, and view, their dashboard grade as it applies to Fieldwood Energy’s requirements.

The Fieldwood Energy, LLC Contractor grading scale is based on a 100 point system.

Any Contractor that is missing, or does not maintain, any of the following requirements will automatically be listed as an “F” rated Contractor:

- An active ISNetwork account.
- An active DISA account.
- An accepted MSA, or Contract, with the required insurance coverage.

Contractor Grades reflect the following status:

“A” Rated Contractors will be listed as Excellent-Preferred Contractors (Must have a score between 90 & 100 points) and may be used without restrictions.

“B” Rated Contractors will be listed as a Preferred Contractors (Must have a score between 80 & 89.9 points) and may be used without restrictions.

“C” Rated Contractors will be listed as a Non-Preferred Contractors – Use with Caution (have a score between 70 & 79.9 points) Fieldwood Energy personnel should seek an “A” or “B” rated Contractor that provides the same service.

“D” Rated Contractors will be listed as Non-Preferred Contractors (have a score between 60 & 69.9 points) and the Contractor must submit a Safety Improvement Plan (SIP) to Fieldwood Energy. The SIP must be approved by the Fieldwood Energy EH&S Department prior to use, or continued use. An “A” or “B” rated Contractor should be sought that provides a similar service.

“F” Rated Contractors will be listed as Non-Preferred Contractors (have a score below 59.99). The use of this Contractor will require approval by a Vice President prior to use, or continued use. In addition, a Safety Improvement Plan (SIP) must be submitted and approved by the Fieldwood Energy EH&S Department. An “A” or “B” rated Contractor should be sought that provides a similar service.

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GRADE	POINT RANGE
<b>A Excellent Rating - Preferred Contractor</b>	<b>90 - 100</b>
<b>B Preferred Contractor</b>	<b>80 – 89.9</b>
<b>C Non- Preferred Contractor – Use with caution. Requester should seek A or B rating contractor that provides same service.</b>	<b>70 – 79.9</b>
<b>D Non-Preferred Contractor – The requester should first seek A or B rating contractor that provides same service. A Safety Improvement Plan (SIP) must be submitted and approved by Fieldwood’s EHS Dept and the requester’s Supervisor prior to use or continuance of use.</b>	<b>60 – 69.9</b>
<b>F Non-Preferred Contractor – Requester should first seek A or B rating contractor that provides same service. The use of this contractor will require VP approval prior to use or continuance of use. Also, a Safety Improvement Plan (SIP) must be submitted and approved by Fieldwood’s EHS dept. or Manager and the requester’s Supervisor prior to use or continuance of use.</b>	<b>-100 – 59.99</b>

### Individual Employee Eligibility

Although a Contractor may be eligible to obtain work from Fieldwood Energy based on meeting all of Fieldwood Energy’s company level requirements and achieving an acceptable overall company grade, the Contractor must also ensure that their employees are eligible to go offshore to perform that work on a Fieldwood Energy job-site. This eligibility involves verification of Fieldwood Energy required training and compliance with the DISA drug testing consortium. The information that follows will outline the basic requirements that every individual going offshore for Fieldwood Energy **MUST** meet.

### ISNetworld Training Qualifier (TQ) System

Contractors must ensure that every employee going offshore for Fieldwood Energy meets the following criteria:

- Each Contractor must enter all of their employees whom they want to make eligible to work for Fieldwood Energy into the ISNetworld TQ system.
- When entering the employee into the ISN TQ system, the only mandatory information required by ISN is the employee’s full name (NOTE: see next item below for additional information pertaining to SSN’s). When entering the employee’s name, his/her official name as listed on his/her official documents should be utilized. Nick names or aliases are not to be used.



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- Although entering the employee's Social Security number is not mandatory for ISNetworld, **it is mandatory for Fieldwood Energy** and the employee's **full Social Security number** must be entered in the TQ system! This is a necessary requirement due to the fact that the Social Security number is what will ultimately link the employee's drug testing status from DISA to ISN. If the employee's Social Security number is not entered into the ISNetworld TQ system, the employee will never become eligible to go offshore for Fieldwood Energy because their DISA compliance status will never be available to Fieldwood Energy via our electronic scanning system! **NOTE: Fieldwood Energy understands, and is well aware, that some individuals and companies may have concerns about entering Social Security numbers into the ISNetworld system. However, be advised that SSN's are not visible to Fieldwood Energy, other Contractors, Operators or any other entities within the ISNetworld system. This only serves as a behind the scenes link between ISN & DISA. For more information regarding ISNetworld's data security system please contact ISN.**
- A digital photograph of each employee must also be uploaded into the ISNetworld TQ system. After the employee's information and picture has been entered into the system, ISNetworld will automatically send a permanent ISN I.D. card to the employer for each individual entered. **NOTE:** Delivery of permanent ISN I.D. cards could take up to 6 or 8 weeks. However, the employer has the ability to immediately print out a temporary card from their office computer for use by the employee until the permanent ISN I.D. card is delivered.
- Once each employee has been entered into the ISN TQ system, the employer **MUST** select the appropriate **Job Title** from the current **Fieldwood Energy Contractor Training Matrix** located on the Fieldwood Energy SEMS Portal at <https://semsportal.fieldwoodenergy.com> and assign a job title to each employee. Should an employee be capable of performing more than one job, he/she may be assigned to multiple job titles. Should that be the case, that employee must meet all of the requirements for each job title they have been assigned to.
- Once each employee has been entered into the ISN TQ system, the employer **MUST** enter the **date of completion** for each training course required as outlined on the **Fieldwood Energy Contractor Training Matrix** located on the Fieldwood Energy SEMS Portal at <https://semsportal.fieldwoodenergy.com>. Keep in mind that the Fieldwood Energy Contractor Training Matrix contains MINIMUM training requirements. Contractor's that have additional in-house requirements for their employees must also ensure their employees remain in compliance with their own requirements as well. **NOTE:** Fieldwood Energy, LLC only requires the date of completion for each course be entered into the ISN TQ system. Actual training certificates/documents ARE NOT required to be uploaded into ISNetworld at this time.

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However, each Contractor is responsible for maintaining the actual certificates and/or documentation in their office to verify the accuracy of each date entered into ISNetworld. These documents/certificates must be made available to Fieldwood Energy at any time upon request, audit, and incident or accident investigation or for any other reason as determined solely by Fieldwood Energy.

### **DISA Drug Testing Consortium**

All companies that perform work on-site **MUST** have an active subscription to DISA, and any of their employees performing work offshore on any Fieldwood Energy job-site **MUST** be enrolled, and in good standing, within the DISA Drug Testing consortium. The following are the basic guidelines for complying with Fieldwood Energy’s DISA requirements:

- The Contractor **MUST** establish an account with DISA and every employee that will perform work on-site for Fieldwood Energy (or wants to be eligible to perform work for Fieldwood) must be enrolled in the program.
- The Contractor will choose and enroll their employees into the appropriate drug testing program(s) that is applicable to their type of business (D.O.T. or non-D.O.T. drug testing).
- The Contractor **MUST** link their DISA account to their ISNetworld account. This is easily accomplished by simply asking DISA to link their DISA account to their ISNetworld account and providing DISA with their ISN account number. DISA will actually complete the process of linking the accounts.
- If a Contractor’s employees do not fall under the jurisdiction of any D.O.T. regulations, they should establish a non-D.O.T. drug testing program with DISA. To get non-D.O.T. employees satisfactorily entered into the DISA program, each employee **MUST** “test into the system”.
- If a Contractor’s employees do fall under the jurisdiction of any D.O.T. regulations, they should establish a D.O.T. drug testing program with DISA. For those contractors that are already running a D.O.T. drug testing program on their own, or through another provider, those employees may be able to transfer into the appropriate DISA D.O.T. program by providing the necessary paperwork and affidavit. Contractors should consult directly with DISA to obtain specific D.O.T. transfer requirements. **NOTE:** Depending on the type of work and services provided, some Contractors may require a D.O.T. program and a non-D.O.T. program for various personnel within their company.
- Once the Contractor has properly established the necessary account(s) with DISA, all DISA drug testing **MUST** be performed utilizing the applicable DISA documentation, chain-of-custody forms and Medical Review Officer (MRO).



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- DISA has over 8,000 authorized collection sites located throughout most of the United States. There is a good chance that the drug testing company currently being utilized by the Contractor is also set up as an authorized collector for DISA. If not, they can choose to become an authorized collector by contacting DISA for information and requirements.
- When setting up a DISA account(s), the Contractor should discuss the nature of their business and look into any specific needs that can be accommodated by DISA, without interfering with the integrity of the program. (Example: Some drilling companies and marine vessel owners would prefer random drug testing selections be done by rig or vessel rather than by individual employees). If DISA can accommodate the request, they will do so. If it cannot be done within the guidelines of the program, the Contractor will have to comply with the requirements of DISA.

For additional information regarding DISA and their program, please contact them directly.

### **Master Service Agreement (MSA) or Contract**

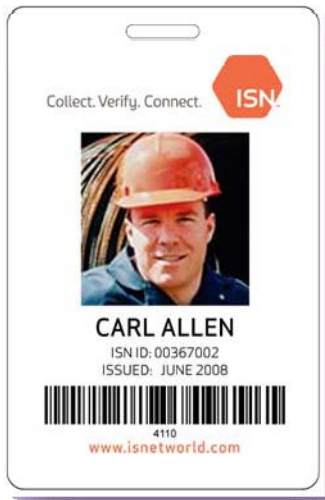
In order for a Contractor to obtain a Master Service Agreement or Contract that will permit them to become eligible to perform work for Fieldwood Energy, the Contractor must identify someone within the Fieldwood organization that would be willing to consider the use of their service and will be willing to sponsor and work with the Contractor to get through the approval process. **NOTE:** A Contractor may have a valid MSA or Contract in place with Fieldwood Energy and still not be eligible to obtain work if they are not in compliance with all of Fieldwood Energy’s Contractor requirements.

### **SEMS Agreement and Expectations Document**

All contract companies performing work for Fieldwood Energy in the Gulf of Mexico **MUST** have a properly executed copy of the Fieldwood Energy SEMS Agreement and Expectations Document uploaded into their ISNetworld account. The signature on the document must be that of member of the Contractor’s Executive Management.

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## ISN ID Cards and Helipass Electronic Scanning System



In order to verify that each individual meets the training and drug testing requirements described within this document, Fieldwood Energy has installed electronic scanning devices (Kiosk's) at all Fieldwood Energy heliports and shore-bases that will verify the required training and drug testing of each individual every time someone checks-in at any Fieldwood Energy heliport or shore base to be transported offshore. This information is verified by electronically scanning the individuals ISNetworld I.D. card that must be obtained from ISNetworld by the employer and then issued to each employee that has been put into the ISN TQ system. Any person not in complete compliance with Fieldwood Energy's Contractor training and drug testing requirements will not be allowed to proceed offshore. Fieldwood Energy **WILL NOT** be held responsible for paying any costs, charges or expenses incurred by the Contractor, or its employee(s), should they arrive at any Fieldwood Energy heliport or shore-base and are denied transportation offshore for being non-compliant with any Fieldwood Energy requirement.

### Fieldwood Energy's Web Based SEMS Portal

Fieldwood Energy has developed a "SEMS Portal" that is also made available for viewing by anyone with internet service, including all Fieldwood Energy, LLC Contractors and potential Contractors. Access to the Fieldwood Energy SEMS Portal can be obtained by going to <https://semsportal.fieldwoodenergy.com>. Information contained on this website can provide our current Contractors, and potential future Contractors, with much of the necessary information they will need to meet Fieldwood Energy's contractor requirements.

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Fieldwood Energy strongly suggest that this web site and the information contained in it, be disseminated to all of the appropriate people within your organization so that they can visit the site and get a better understanding of Fieldwood Energy’s requirements and expectations.

A brief summary of what is available on the site and how the site is structured is described below:

When visiting the Fieldwood Energy SEMS Portal, you will find seven (7) main tabs located near the top of the page. The tabs are listed as 1) Home, 2) Contractor Safety Requirements, 3) Safe Work Practices, 4) Safety Alerts/Memos, 5) Contacts, 6) Resources, 7) SEMS. **NOTE:** The 8<sup>th</sup> login tab is for those individuals that require additional access to functions within the Portal and requires the issuing of additional credentials.

A variety of information that any contractor may be interested in, or needed to become compliant, can be located within each of these tabs as described below:

**Home** – the Home tab, they will see four (4) additional tabs below the main tab and will then be able to review: **#1-Fieldwood Energy’s Safety and Environmental Policy and #2-Fieldwood Energy’s Stop Work Authority Policy**

**Contractor Safety Requirements** - the Contractor Safety Requirements tab, one can gain access to (5) additional tabs below the main tab and will then be able to view: **#1-Fieldwood Energy’s Fire Retardant Clothing (FRC) Policy, #2- Fieldwood Energy’s Offshore Orientation Video Presentation and Documentation Form, #3- The Current Fieldwood Energy Contractor Training Matrix and #4-A link to a Marine Trash & Debris Training Presentation**

**NOTE: Contractors should take special notice of Fieldwood Energy’s Orientation Process and read that policy carefully, as it requires specific action to be taken by the Contractor prior to an employee going offshore to perform work for Fieldwood Energy.**

When one clicks on the Orientation Process tab, two (2) additional tabs will appear below. Be advised that access to the video and form can also be obtained by utilizing the links located on the right hand side of the home page. The “Video” link will lead to Fieldwood Energy’s **Offshore Safety Orientation Video** and the “Form” link will lead to the Fieldwood Energy **Offshore Safety Orientation Verification Form**. The Contractor must utilize both of these items to comply with Fieldwood Energy’s Orientation Process. After each employee has viewed the Fieldwood Energy **Offshore Safety Orientation Video**, an **Offshore Safety Orientation Verification Form** must be completed for each employee. The completed form must be kept on file by the Contractor and must be made available to Fieldwood Energy upon request at any time.

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**Safe Work Practices** - the Safe Work Practices tab, one can read and review Fieldwood Energy's Safe Work Practices pertaining to **Management Commitment, Hazard Control, Incident Reporting/Investigation, Specific Safe Work Practices, Occupational Health, Emergency Preparedness, Contractor Qualification/Training & Environmental Practices.** In addition, located below the Safe Work Practices tab, links are provided to Fieldwood Energy's **Material Shipping Procedures** and **Waste Management Plan.**

**Safety Alerts/Memos** - the Safety Alerts/Memos tab, one can view, read and locate a variety of Safety Alerts and Policy Guidance memos issued by Fieldwood Energy and several government agencies. An additional tab is located below the main Safety Alert/Memos tab and is listed simply as **BOEM/BSEE.** This tab links directly to the BSEE website where additional BSEE issued Safety Alerts and information can be obtained.


**Contacts** –the Contact tab, one can view the primary Fieldwood Energy telephone numbers and contact information.

**Resources** –the Resources tab, one can find links to a variety of industry related websites that may be of interest to the user.

**SEMS** - the SEMS tab, one can view Fieldwood Energy's **Safety and Environmental Management Systems (SEMS)** for the Gulf of Mexico.

**Login** - This section is a password protected section of the site and is not be available for all contractors or the general public. Fieldwood Energy Employees, Consultants and Contract Production Operations Personnel requiring access to more detailed Fieldwood Energy specific information such as MOC, Incident Reporting (LOR), Environmental Information, etc. may request permission into the site by selecting the register button on this page. They must complete the registration form and wait for an e-mailed response to the request. Access will be granted or denied by Fieldwood Energy on an as-needed basis only.

**Additional SEMS Portal Help** – For additional assistance or answers to any additional questions regarding any aspect of SEMS or Fieldwood Energy's SEMS Portal, any individual can click on the **SEMS Help** link located on the top right hand side of the home page. This link will allow you to send an email directly to the Fieldwood Energy SEMS group, who will be able to answer your question or provide the necessary guidance.

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Fieldwood Energy hopes that the information provided in this document, and contained on the Fieldwood Energy SEMS Portal, will answer most questions regarding Fieldwood Energy's Contractor Requirements and assist all of our Contractors, and Prospective Contractors, with getting into full compliance with all of Fieldwood Energy's Contractor Requirements and SEMS program.

For additional assistance with any EH&S matters, ISNetworld grading , compliance status or any other issue pertaining to Contractor Compliance issues, please contact the following Fieldwood Energy Contractor Safety Management Coordinator:

- David Dugas – Sr. EH&S Specialist & Contractor safety Management Coordinator – Lafayette, LA – [David.Dugas@fwellc.com](mailto:David.Dugas@fwellc.com) or (337) 354-8000.