## **Governing Energy**

#### Stop Work!

Volume 1 Number 12—July 16, 2012

This phrase is generally defined as the authority of anyone regardless of position or seniority on a job site to authorize work stoppage when an unsafe or environment hazard is identified.<sup>i</sup> There is another situation where a stop work may be required.

Think of a circumstance when an employee or contractor without malice puts a given field process out of compliance with various regulations. In many cases, for example the new deepwater drilling regulations, an individual on the offshore drilling rig either by action or inaction can place the entire operation at jeopardy with regulations, especially safety regulations.

If during the period of "non-compliance" an incident occurs, the operator may not be able to escape liability. Moreover, it is unclear how much responsibility the operator can "lay off" on the contracting company. Unplanned operational downtime or a safety incident are two potential outcomes for being out of compliance requirements and putting your "license to operate" at risk.

There are two actions firms must take to minimize the risk of an incidental noncompliance problem. First, and most importantly employees, contractors, subcontractors and suppliers must be trained and updated often.

It is not enough to complete certification for a job; there must be an ongoing formal and informal updates not unlike the Continuing Professional Education (CPE) credits accountants, attorneys and engineers are required to complete on an annual basis. In addition, Standard Operating Procedures (SOPs) must incorporate compliance processes into the work processes in a way that is easy to understand without requiring the individual to become a "field" lawyer.

Todays' mobility devices allow both. All individuals regardless of grade or organization can undergo continuous training without attending the classroom. Distance learning can be brought to the field.

Moreover, compliance management can also be integrated into online SOPs. It then becomes part of the individual job description and not just something else to deal with as additional "paperwork."

Since both of these major categories are delivered in an online format, the training and work process checklist, SOP and maintenance documents are the "current" version annotated for that particular individual and in that particular oil or gas field or facility.

Finally, the entire process undergoes an automatic audit. This provides management with documentation that may be required from time to time by various regulatory bodies.

The alternative is a number of fragmented processes with few assurances that at a particular moment in time operations may technically be out of compliance.

# How does your company support highly talented empowered field personnel thus minimizing inadvertent out of compliance?

### **About the Author**

Dr. <u>Scott M. Shemwell</u> has over 30 years technical and executive management experience primarily in the energy sector. He is the author of two books and has written extensively about the field of operations management. Shemwell is also the CEO of Knowledge Ops, Inc.; a firm that focuses on providing its customers with solutions enabling operations excellence and regulatory compliance management.

### **End Notes**

<sup>i</sup> <u>http://www.hanford.gov/files.cfm/Hanford\_Stop\_Work\_Procedure.pdf</u>