

(Company)

SEMS Due Diligence Checklist

General

1. Offshore organizational chart/structure, specific details regarding designation of facility PIC's, SEMS responsibilities
2. POB rostering system, manhours tracking data (BSEE 131 data requirements)
3. HSE/SEMS directives to facility personnel/contractors in force at time of transfer
4. SEMS document(s) – Global Set
 - a. Mechanism available for transition to (COMPANY) of SEMS data retained in a data retention or document management system

Leadership & Accountability

1. SEMS/HSE bridging agreements with other “Non-contractor” parties such as other operating companies, pipeline companies, etc..
2. SEMS/HSE goals & targets & programs
 - a. Action tracking/management register with status info
 - b. HSE performance data (especially contractors in place)

Regulatory

1. BSEE 131 form data/documentation

Facility Design & Engineering

1. Analysis/evaluations of facility design to establish conformance with established governing standards (for those facilities where conformance to design standards was not established/documented at time of construction or the documentation no longer exists)
2. Material and energy balance assessments (if applicable)
3. For any facilities designed/constructed after Nov. 15, 2011:
 - a. Protocols/standards for how Human Factors were addressed within the facility design process
 - b. Evidence of QA/QC related to materials of construction & traceability records
4. Additional FD&E data/records as defined in the SEI table

Contractor Management

1. List of contractors currently working offshore on leases
2. Evidence of contractor selection criteria, evaluations, audits for active contractors, records of follow-up actions
3. Any available Contractor Bridging Agreements that would be transferrable to (COMPANY)
 - a. Especially contract Production & Drilling contractors
4. Contractor verification records (SEMS Awareness sessions, training, HSE performance, post-job evaluations, etc.)

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Safety & Environmental Information

1. Database of SEI records status
2. Native & PDF formats of documentation indexed within table below (including XRF's for ACAD files)
3. Including documentation related to drilling, completion and well-servicing activities.

Hazards Analysis

1. HA standards, procedures, protocols applied or the conduct of HA's on affected facilities
2. HA's for records all facilities:
 - a. Documents reviewed during HA's
 - b. Completed HA checklists
 - c. Action item registers and action item close-out documentation
 - d. Method to correlate subsequent MOC's to action items
3. Evidence of verification for HA/COI documentation for MODU, Platform Rigs or other vessels used for lease operations
4. Evidence of justification for HA grouping of like facilities

Job Safety Analysis

1. JSA standards, procedures, protocols applied or the conduct of JSA's on affected facilities
2. JSA records for operations conducted on leases (since Nov 15, 2011):
 - a. Production
 - b. Construction
 - c. Drilling
3. Method for transfer of archived JSA's

Management of Change

1. MOC packages since Nov 15th
 - a. Including personnel MOC's as well as facility MOC's
 - b. Drilling/Wellwork/Well
2. Evidence of change notifications to affected personnel
3. Details/list of all changes in play at current time

Operating Procedures

1. Standards/specifications used for OP/MP development
2. OP's / MP's for facilities (incl. native format documents)
3. OP/MP training records

Safe Work Practices

1. No SWP transition requirements unless regulatory mandate exists

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Training

1. Training records for any personnel that will transfer to (COMPANY)/(COMPANY) Contractors as part of acquisition
2. Training records & Knowledge & Skills verification evidence for any resident contractors on facilities and for those non-resident contractors who have been evaluated
3. Training requirements applicable to personnel working on leases
 - a. Evidence of compliance verification
4. Visitor orientation records
5. Evidence of verification of instructor qualifications for affected training
6. Any training waivers granted to individuals/contractors that would be in force at time of transition

Assurance of Quality & Mechanical Integrity

1. MI program/procedures in place since Nov 15th
2. Inspection, maintenance, QA/QC & materials traceability records for facility equipment
 - a. Cranes
 - b. Compressors
 - c. Fire Pumps
 - d. Pressure & Atmospheric vessels (including fired components)
 - e. Piping Systems
 - f. Pumps
 - g. Wellheads & flowlines
 - h. Relief systems
 - i. Safety Condition detection and shutdown systems
3. Register of discrepancies identified through MI program, including evidence of action & closure

Pre-Startup Review

1. Completed PSR checklists for MOC's or other applicable events since Nov 15th

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Emergency Response & Control

1. Drill records
2. Applicable EEP, ERP, OSRP
3. Emergency training records for affected personnel
4. Agency reporting of emergencies/incidents
 - a. Evidence of any spill reports to NRC since Nov 15th
 - b. Other reports to regulatory agencies (BSEE, USCG, etc..)

Incident Investigation

1. Incident reports, follow-up records, investigation reports
2. Register of incidents

Auditing

1. Audit records for facilities, including comprehensive register for action closure tracking & current status

SEMS Records & Documentation

Record / Document Description	Required Retention Period
<ul style="list-style-type: none">• All SEMS records and documents, including SEMS reviews and audit reports <p>(All have the same retention period except for those listed below)</p>	<ul style="list-style-type: none">• Onshore for a minimum 6 years
<ul style="list-style-type: none">• Completed Job Safety Analysis records (including PIC signatures)	<ul style="list-style-type: none">• Onsite for a minimum of 30 days (Note: For JSA's documented on unmanned facilities with no offshore records storage capabilities, JSA records will be maintained at the nearest offshore manned facility or onshore if facility is on a Loop operation)• Offshore or onshore for a minimum of 2 years
<ul style="list-style-type: none">• All individual MOC related records and documents	<ul style="list-style-type: none">• Onshore for a minimum of 2 years
<ul style="list-style-type: none">• Illness/Injury logs, including those of contractors who have (or are) performing work for (COMPANY)	<ul style="list-style-type: none">• Onshore for a minimum 2 years
<ul style="list-style-type: none">• Evaluations of contractor safety policies, procedures and performance	<ul style="list-style-type: none">• Onshore for a minimum 2 years
<ul style="list-style-type: none">• SEMS program documents and all referenced and associated procedures	<ul style="list-style-type: none">• Continuously maintained in current state at onshore location
<ul style="list-style-type: none">• Process, mechanical and facility design information	<ul style="list-style-type: none">• Life of affected equipment/facility
<ul style="list-style-type: none">• Pressure vessel testing & inspection records	<ul style="list-style-type: none">• Life of equipment
<ul style="list-style-type: none">• All other mechanical integrity program records (besides those for pressure vessels noted above)	<ul style="list-style-type: none">• Onshore for a minimum of 2 years
<ul style="list-style-type: none">• Current hazards analysis reports, including action item closure records	<ul style="list-style-type: none">• Life of facility
<ul style="list-style-type: none">• Incident Investigation reports	<ul style="list-style-type: none">• Onshore for a minimum of 10 years

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Record / Document Description	Required Retention Period
	(OP revalidation – max timespan)

Environmental Records & Documentation

1. Spill reports and follow-up information
2. Notice of Intent (NOI) for NPDES permit coverage (should include permit number)
3. The designated outfall number by EPA
4. Annual EPA Discharge Monitoring Report (DMR) submittals
This should include reporting in 2012 if reported already.
5. Monthly NPDES monitoring reports
6. Toxicity and other testing (e.g., oil and grease) final reports from testing lab, if the facility has produced water discharge
7. BOEM/BSEE inspections, including a list of any INCs and outstanding corrective actions
8. Venting and flaring records
9. GOADS monthly data and report
10. Greenhouse Gas Reporting Information
11. Waste management plan
12. Waste/refuse disposal and shipping logs/manifests (includes hazardous waste shipping information)
13. Other recent third party inspections or audits and corrective actions following