International Association of Drilling Contractors

HSE&T Committee Meeting
IADC – Houston Office – Crown 1
January 24, 2023
Hybrid Meeting

Attendance

V = Virtual attendance, IP = In-Person attendance

In-Person Attendees					
Name	**Company**	**A**	**Name**	**Company**	**A**
Brooke Polk	IADC	IP	Olaf Martinez	IADC	IP
Marcelo Azeredo	Transocean	IP	John Large	Salunda	IP
Ryan Smallwood	Patterson-UTI	IP	James Penny	Transocean	IP
Miron Bertsch	Rig QA	IP	Thomas Lemoine	Salunda	IP
Roland Moreau		IP	Ricky Banks	Noble	IP
Rick Cannon	Clearflow Sol	IP	Brandy Harrington	COS	IP
Shane Phipps	Wilbanks Trucking	IP	Fidel Garcia	RelyOn Nutec	IP
Dereck Hibbard	Seadrill	IP	Julia Fitzgerald	API/COS	IP
Zoom Attendees					
Name	**Company**	**A**	**Name**	**Company**	**A**
Nathan Ferrell	Independence Contract Drilling	V	Juan Mora		V
Rodrick Jones	Patterson-UTI	V	Paul Finnie	Diamond Offshore	V
Allison Fischman		V	James Taylor		V
Brandon Grosvenor	OPITO	V	Juan Pablo Arias		V
Jim Rocco	IADC	V	Tim Dibben	Akita Drilling	V
Micah Backlund	H&P	V			

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Agenda

09:00 – 9:08	Welcome, IADC Antitrust Policy, and Agenda Overview *Derek Hibbard, SeaDrill* *Brooke Polk, IADC* *Ryan Smallwood, Patterson-UTI Drilling*
9:08– 9:15	**Safety Moment(s)** *Choking Hazard – Scenario* Presented by Nicholas LeGouhinec (Valaris) Nicholas described a scenario where a group of colleagues went out to eat at a restaurant, one of his colleagues started to cough due to a piece of food he had lodged in his throat. In order to not draw attention to himself, he decided to go to the bathroom. They were fortunate that one of the other colleagues went to the bathroom and found out that he was choking. Here is a situation where you want to draw as much attention to yourself for others to notice. It also helps if your colleagues know the symptoms of choking, and what to do when someone is choking. The American Red Cross has a lot of good resources on how to recognize the symptoms and administer the proper techniques. *Rig Move Safety* Presented by Nathan Ferrell (Independence Contractor Drilling) Nathan reminded everyone about the importance of Rig moving safety and how important it is for newcomers to be aware of different terrains/territories. Please train your people on How to pack for the trip, what medical supplies are needed, what to do if they become stranded. Make sure all emergency contact is in place. Make sure communication devices work and have been tested: cell phones, radios. And finally have an emergency contingency plan in place.
	Action Item: next meeting safety moment volunteers James Penny/Transocean Jason Tensen/Ensign
9:15-9:17	**Presentation of IADC Committee Chair Awards** *Presented by Brooke Polk – IADC* Recipients: Derek Hibbard James Penny
9:17-9:18	**HSE&T Chairman Handover** Derek Hibbard announces Ryan Smallwood as the new Chair for the HSE&T Committee, with James Penny as Co-Chair. File for motion. All in favor? All: Aye

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9:18-9:20	**Introduction of Ryan Smallwood** Ryan currently works for Patterson-UTI Drilling "I want to make sure that we are representing both sides of our industry, land and offshore, in order to provide the best insight."

9:20-9:50	**Crew Hawk Presentation**
	Presented by John Large, Salunda
	And Thomas Lemoine, Salunda
	
	Automated Wireless Drilling
	
	What it is: Real-time location monitoring of crew and equipment
	    <u>Static Zones:</u> setbacks, near misses
	    <u>Dynamic Zones:</u> pipe racker, roughneck
	
	Driller's Cabin User Interface
	    -Driller's Station
	    -PL Charger (programable logic), 2x/Day/Night
	    -EL Charger
	
	Operating Modes
	    -Define operating modes
	    -Define zones by operation
	    -Define access rights
	
	Analytics:
	    -Interactive Dashboards
	    -Playback
	    -Heatmaps

9:50-10:01	**Break**

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10:01-11:08	**Panel Presentation and Discussion – Never Getting Away from the Basics of Safety** *Nicholas LeGouhinec, Valaris* *Paul Finnie, Diamond Offshore* *Derek Hibbard/Seadrill*

	Derek Hibbard - Seadrill
	"Lets get back to the basics"
	
	Agenda
	      -Incident Investigation Challenges
	      -Operational Assurance Program
	      -Behavior Based Safety Program
	      -New Hires Onboarding & Orientation
	
	BOLD for Supervisors
	      Build a culture of operational excellence.
	      -Visible leadership
	      -Focus on Front Line Supervisors
	      -Engrain understanding
	      -Reinforce Key Skills
	      -Virtual or In-Person workshops supported by e-Learning
	      -Empower participants and managers to drive improvement within their area of control.

	Nicholas LeGouhinec - Valaris
	"Task Processes PIMED"
	      Plan ➜ Identify ➜ Manage ➜ Execute ➜ Debrief
	      TOFS ➜ Time out for Safety
	
	Focus Points for Leading
	      -Facilitating a Pre-Task Meeting
	      -Tempo
	      -On the Day Risk
	      -Drift/Deviation from the plan
	      -STAR Drills
	      -Worksite Verification
	      -Debriefs

	Paul Finnie – Diamond Offshore
	"Our HSE Priorities for 2023"
	      -Care for our people
	      -Prevent Major Accidents
	      -Prevent dropped objects
	      -Reduce Fluid transfer and Containment Events
	      -Lift Safety

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11:09-11:32	**IADC Updates** *Bill Krull – ISP Updates* *Thad Dunham – Onshore Regulatory Updates* *Brooke Polk – Accreditation Updates* *Jim Rocco – Offshore Regulatory Updates*

	<u>Bill Krull</u>
	    -Our Executive Committee agreed to proceed with our ISP program
	    -Launch ETA is end of summer 2023
	    -Steering Committee ➔ HSE Committee will meet throughout the year to see if we are launching on time and make any necessary adjustments beforehand
	
	We will keep everyone posted.

	<u>Brooke Polk</u>
	    <u>H2S</u>
	    Our H2S program is currently being built.
	    The approval process will be a little bit different for this. The proposal will have to go to the North American Onshore Advisory Panel and to our Executive Committee for comment and vote.
	
	    <u>Well Control</u>
	    Our Advisory Panel is currently in talks of deciding what to do with our continuous learning (KREW) program. (Alternative Pathway, and not intended for first time rig personnel)
	    They are also reviewing the simulation requirements currently in place for Well Control. They are trying to determine if well control simulation can be done virtually through e-learning, or if it needs to be in-person. New requirements and modifications should be completed by the end of this summer (2023).
	
	    <u>Basin United Facilitator Course</u>
	    Our Basin United facilitator course is currently undergoing revisions. RelyOn Nutec will be facilitating our Facilitator courses. We have some already lined up this year, if you know of anyone who is interested, please have them go to our website, the information will go on there later this month.

	<u>Thad Dunham</u>
	IADC currently has an open vacancy for a DC representative that will represent us over in Washington, D.C. If you know anyone who might be interested, please have them reach out to me.
	
	Also, if anyone is interested in joining our IADC Advocacy Membership (Driller's PAC) it is free. There is a banner located right outside in the lobby area, with a QR code to scan if you want to join.
	
	    <u>OSHA Update:</u>
	    OSHA is currently launching a "violator" program. In short, is it is an initiative that will pull you in if you have 2 or more violations. Hefty fines are involved.
	    They are also in talks of wanting to include the Oil and Gas industry into their Process Safety Management Standard. IADC has submitted verbal comments: We do not agree/are not onboard with a couple of requirements.

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Thad turns the floor over to Shane Phipps with Wilbanks Trucking.

<u>Shane Phipps</u>
I want to take this opportunity and ask if we can join the HSE&T committee to provide insight.

<u>Ryan Smallwood</u>
Any thoughts or objections from any members here in person or online on zoom?
None.

Ok. we will work on the legalities to move forward with this.
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<u>Jim Rocco</u>
There is currently a bill circulating the senate that is trying to push for foreign nationals.

<u>IMO Meeting</u>
Increasing requirements on MODUs on the use of asbestos.

<u>Hazardous Equipment Verification</u>
-Unified
-Address equipment that is installed just outside the zone
-We already have language in place that we can plug in.

<u>Cybersecurity</u>
-Operational Technology ➔ what to do when things can go bad, really bad if your equipment gets hacked
-We need to bring up the new markets (Guyana/Surinam) up to speed.
-The International regulatory forum believes we can mitigate WC risk by brining on digitalization.
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<td>**11:33 – 12:05**</td>
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SafeOCS Industry Safety Data (ISD) Program Overview
Roland Moreau – US Department of Transportation
Allison Fischman – US Department of Transportation

<u>Safe OCS Overview</u>
Equipment Failure Reporting Programs
Critical Safety Equipment
Industry Safety Data Programs

<u>Reporting</u>
WCE Reporting
SPPE Failure Reporting
Industry Safety Data

<u>Why SafeOCS?</u>
Central repository
Value-added
Alignment on incident and indicator definitions
Secure and confidential process
Robust methodology
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	Aggregated results Opportunities to network Continuous feedback and learning [Presentation Attached]
12:06 – 12:13	**Next Steps for HSE&T** *Ryan Smallwood – Patterson* 1 – We're currently looking into a Risk Analysis Committee (High Pressure Drilling Systems). This came up in one of our previous committee meetings during a safety moment. 2 – We are also going to make a "Sustainability" comeback on the IADC webpage. It will have a lot more information and be more robust. 3 – We have another workgroup that is currently looking at improving reporting.
12:14pm	**Adjournment**

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Action Items

Action No.	Action	Responsible	Action Due Date
1	Post meeting minutes on IADC committee website	IADC	14FEB2023
2	James Penny/Transocean and Jason Tensen/Ensign will present the Safety Moment for our next HSE&T meeting	James Penny Jason Tenson	17APR2023
3	Formalize initiation of Trucking industry into the HSE&T Committee	Ryan Smallwood Brooke Polk James Penny	17APR2023
4	Invite the US Department of Transportation group to do a full presentation at our next meeting in April	Brooke Polk	15MAR2023
5			
6			

International Association of Drilling Contractors
IADC HSE&T
IADC - Houston Office - Crown 1
9:00am - 12:00pm
24-Jan-2023
In-Person Sign In

Name (First/Last)		Company Name	Email	Signature
Olaf	Martinez	IADC	olaf.martinez@iadc	*(signed)*
MARCELO	AZEREDO	TRANSOCEAN	MARCELO.AZEREDO@DEPWATER.com	*(signed)*
JOHN	LARGE	SALUNDA	JLARGE@SALUNDA.com	*(signed)*
RYAN	SMALLWOOD	PTEN	RS RYAN.Smallwood@PATENERGY.com	*(signed)*
Brooke	Polk	IADC		Brooke Polk
James	Perry	Transocean	james.perry@deepwater.com	*(signed)*
MIRON	BERTSCH	Rig QA	MIRONb@RigQA.com	*(signed)*
Thomas	Lemoine	Salunda	TLemoine@salunda.com	*(signed)*
Roland	MOREAY	BTS	RLM13@comcast.net	*(signed)*
Ricky	BANKS	Noble	Rbanks@NobleCorp.com	*(signed)*
RICK	CANNON	Clearflow Jol	medadTe@outlook	Rick C
Brandy	Harrington	COS	harringtonb@api.org	*(signed)*
Shane	Phipps	Wilbanks Trucking	sphipps@wilbanks.us	Shane Phipps
Fidel	Garcia	Relyon Nutec	fg@relyonnutec.com	*(signed)*
Derek	Hibbard	Seadrill	derek.hibbard@seadrill.com	*(signed)*
Julia	FitzGerald	API/COS	fitzgeraldj@api.org	JFG

SafeOCS Industry Safety Data (ISD) Program Overview

Meeting with IADC HSET Committee

January 24, 2023

Agenda

- SafeOCS Overview
- SafeOCS ISD Program
  - Why SafeOCS ISD?
  - SPE/BSEE Summit – April 2016
  - Data Protection & Confidentiality
  - Data Processing Overview
  - Sharing Results through Dashboards
  - Memorandum of Agreement
  - Current Focus and Next Steps

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SafeOCS Overview

Equipment Failure Reporting Programs

WCE
Well Control Equipment Reporting

SPPE
Safety and Pollution
Prevention Equipment Reporting

- Mandatory reporting under 30 CFR 250.730(c) and 250.803.
- What's reported: Any condition that prevents covered equipment from meeting its functional specification.
- This equipment is **critical safety equipment**, meaning equipment which is part of a physical barrier system and whose malfunction could result in a catastrophic release of hazardous substances.
- E.g.: blowout preventers (BOPs), critical safety valves

Industry Safety Data Program

ISD
Industry Safety Data

- Voluntary participation
- What's reported: Incidents, near misses, and stop work events that cause (or could have caused) human injury/fatality, damage or loss of assets, or negative environmental impact.

Operation/Activity
Equipment Types
Event Types
Detection Methods
Contributing Factors
Root Causes
Corrective Actions
Well Information
Population Characteristics

All reports to SafeOCS are confidential and protected from release under CIPSEA.

2021 WCE Annual Report: A Five-Year Review

- 2017-21: Industry contributed more than 4,600 events to the SafeOCS WCE database

- Most events (85%) occurred during MIT

- Most common components:
  – Subsea stack: regulators, solenoid valves (hydraulic), SPM valves, slide valves, piping/tubing
  – Surface stack: accumulators, ram block seals, regulators, C/K valves, packing elements

- Available at www.safeocs.gov

Figure 1: Levels of Well Activity in the Gulf of Mexico OCS, 2017–2021

BOP Days, in Hundreds of Days

Average Rig Count
Monthly Average Wells Spud

Reported Events per Hundred BOP Days

Q1 Q2 Q3 Q4 | Q1 Q2 Q3 Q4 | Q1 Q2 Q3 Q4 | Q1 Q2 Q3 Q4 | Q1 Q2 Q3 Q4
2017   2018   2019   2020   2021

SOURCE: U.S. DOT, BTS, SafeOCS Program. Rig counts from Baker Hughes Rig Count, https://rigcount.bakerhughes.com/.

SafeOCS – SPPE Failure Reporting

- Reporting requirements are similar to WCE program, and aggregated results are shared in annual reports and monthly dashboard (SPPE home page).

- The specific SPPE covered by the rule protects personnel and the environment by controlling the flow of well fluids, especially in case of an emergency or failure.

- Failure reporting form and guidance updated in December 2020 to improve the data collection.

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Why SafeOCS ISD

"The opportunity for the next step changes in safety performance appears to be in a substantial increase in the sharing of data across industry. Leading practices in other industries (i.e., transportation) may be adopted in the oil and gas industry to similar effect …"

International Regulators Forum on Global Offshore Safety - June 2018

Why SafeOCS ISD?

- Provides **central repository** for collection, collaboration, and sharing of industry trends of concern
- Identifies types of data that will provide **value-added** information
- Gains **alignment on incident and indicator definitions**
- Utilizes **secure and confidential process** for collection and analysis of the data
- Implements **robust methodology** for identifying systemic issues
- Disseminates **aggregated results** to facilitate actions to minimize risk of recurrence by enhancing barrier integrity
- Provides **opportunities to network** and benchmark performance, both individually and as an organization
- Encourages and facilitates **continuous feedback and learning** in support of ongoing safety management systems and programs

SafeOCS ISD Program Origins

Interagency Collaboration

SPE Summit
SafeOCS Industry Safety Data Collection Begins (ISD Phase I)

ISD Phase I

2015 – BSEE and BTS entered into Interagency Agreement to develop and manage industry-wide confidential safety data program

2016 – Society of Petroleum Engineers (SPE) and BSEE co-lead industry summit to discuss feasibility of industry-wide safety data management framework

BTS input on data capture methodologies and confidentiality

2017-2019 – Nine companies participated in Phase I "proof of concept" for proposed industry-wide program

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Scope of SafeOCS Industry Safety Data Program

Going beyond reportable events, to further down in the safety triangle.
- Reportable events
- Near misses
- Safety observations
- Other safety data

An understanding of precursor events – types, conditions, behaviors – can inform learnings on how to strengthen key barriers.
- *Precursor event*: event that might indicate the potential for a more significant incident.

All data is protected under CIPSEA.

Confidential Information Protection and Statistical Efficiency Act (CIPSEA)

- Prohibition on release of data
  - No government agency may require, for any reason, a copy of any respondent's report
  - Courts cannot require a copy of any respondent's report; reports are immune from the legal process and cannot be admitted as evidence
  - Reports are exempt from Freedom of Information Act (FOIA) requests

- Disclosure is the unauthorized release of confidential information

- Willful disclosure of confidential information may incur sanctions and penalties
  - Removal from office, and/or
  - Fines (up to $250,000) and/or imprisonment (possible felony conviction)

- Applies to all federal employees, contractors, and agents

Scope of Confidentiality Protection

Confidential Information Protection and Statistical Efficiency Act

Sets up framework wherein adverse actions cannot legally be taken against data submitters, nor can raw data be used for regulatory purposes

What Is Confidential?

- Any original reports to BTS through SafeOCS

- Any BTS working documents

- Sections of root cause analysis reports developed by the SMEs

- All the above whether paper or electronic

What is Not Confidential?

- Information on preventive safety action recommendations by SMEs or other stakeholders

- Documents developed for public dissemination using confidential information

- Dashboards of industrywide aggregated data developed for public dissemination

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SafeOCS ISD Program in a Nutshell

Overarching Objective:

To provide a comprehensive source of near miss and safety event reports from the offshore energy industry.

- **Voluntary, confidential** reporting program for near misses and safety data in the offshore oil and gas industry.

- To participate, companies **enter an MOA** with BTS:
  - Type of data to be submitted
  - Event date ranges
  - Data format

- All companies working in the Gulf of Mexico are encouraged to participate.
  - **Participating companies represent ~92% of production**

- BTS **transforms** each company's data into the standardized data fields and format.

Personal Safety and Health
- Personal safety events
- Dropped object events
- Fires in accommodations
- Equipment collision events
- Non-work related events

Process Safety
- Well control events
- Fires outside accommodations
- Explosion events
- Process safety events
- LOPC process safety events
- H2S events
- Muster events

Environmental Stewardship
- Material overboard events
- LOPC non-process events
- Environmental events

Transportation
- Collision events
- Station keeping events
- Aviation events

Baseline Data Fields

SafeOCS ISD

Event
- Identifier
- Event type
- Event involves
- Event date
- Event time
- Description of event
- Consequences
- Process safety event
- Proc. safety event tier
- Geographic region
- Physical location
- Asset type
- Operation type
- Primary activity type
- Location on facility

Injury/Illness
- Injury/illness classification
- Injured party (IP) type
- Injury type
- Body part

Loss of Primary Containment
- Material released
- Released to
- Onsite or offsite
- Reported volume

Fire
- Type of fuel
- Source of ignition
- Duration (minutes)

Investigation
- Causal factors
- Causal factor narrative
- Corrective actions

Dropped Object
- Object dropped

Property Damage
- Equipment damaged

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Program Contributors & Stakeholders

Service Companies (3)

Operators (13)

Academia

Drilling Contractors (3)

Industry Organizations

bts

Government

BSEE
Bureau of Safety and Environmental Enforcement

Phase I effort included:
- Rowan/Ensco
- Pacific Drilling

Drilling Contractor Participation

Signed MOAs:
- Enterprise Offshore
- Transocean
- Valaris

Pending MOA:
- Seadrill

Invited to Participate:
- Diamond Offshore
- Stena Drilling
- W&T Offshore

Pending Outreach:
- Noble Drilling

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SafeOCS by the Numbers (*post-Phase I*)

Event Count

- with_con
- without_con

Average 1,081.25

1500
1000
500
0

2018 — 2019 — 2020 — 2021 — 2022

| **12** |
| companies that have submitted data |

| **10 / 7** |
| companies with deepwater / shelf events |

| **14,318** |
| with consequences |

| **2,620** |
| Without consequences |

| **30,520** |
| Safety observations, from 2 companies |

| **14** |
| Calendar quarters represented (2018 – 2021 Q2) +4 with partial data |

| **174** |
| Events reported by multiple companies (6 company pairs) |

| **4** |
| 2 ad hoc work groups in 2020/2021 2 ad hoc groups in 4Q22 |

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Recent Milestones

Implemented ETL Process

9/2020 Ad Hoc Work Group – Focus Areas

2021

4/2021 Ad Hoc Work Group – Dashboards

10/2021 Participant Dashboard Initial Release

Dashboard Tutorials & Feedback Sessions

2/2022 Public Dashboard Initial Release

2022

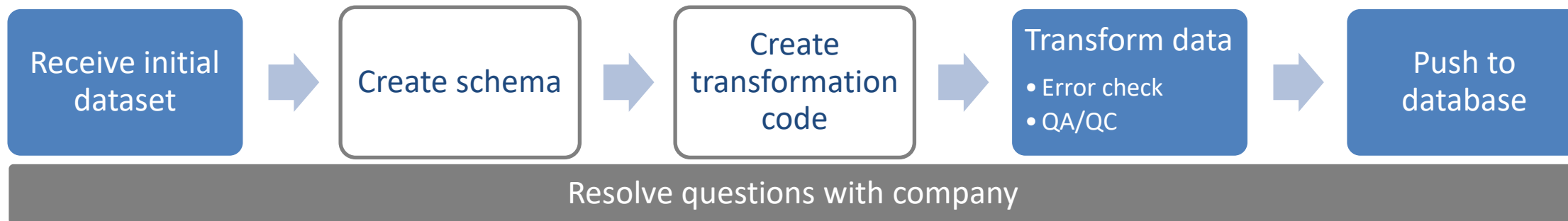Ongoing Quarterly Updates of Participant
& Public Dashboards

9 & 10/2022 Ad Hoc Work Groups:
- Stakeholder Needs
- Short Service Employees

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Data Processing Overview

Process Initial Dataset

| Receive initial dataset | → | Create schema | → | Create transformation code | → | Transform data
 • Error check
 • QA/QC | → | Push to database |

Resolve questions with company

Process Subsequent Datasets

| Receive dataset | → | Adjust schema and code | → | Transform data
 • Error check
 • QA/QC | → | Push to database |

Resolve questions with company

SafeOCS ISD Data Processing Company-Level Overview

- Meet with company on ISD core data fields

- Company uploads initial dataset through SafeOCS secure portal

- Create company-specific mapping schema

- Resolve any questions about company's data

- Develop code to automate transformation for company's subsequent data uploads

- As data comes in, transform, error-check, and push to database

Dashboards Overview

Participant dashboard

- company-specific
- behind a login
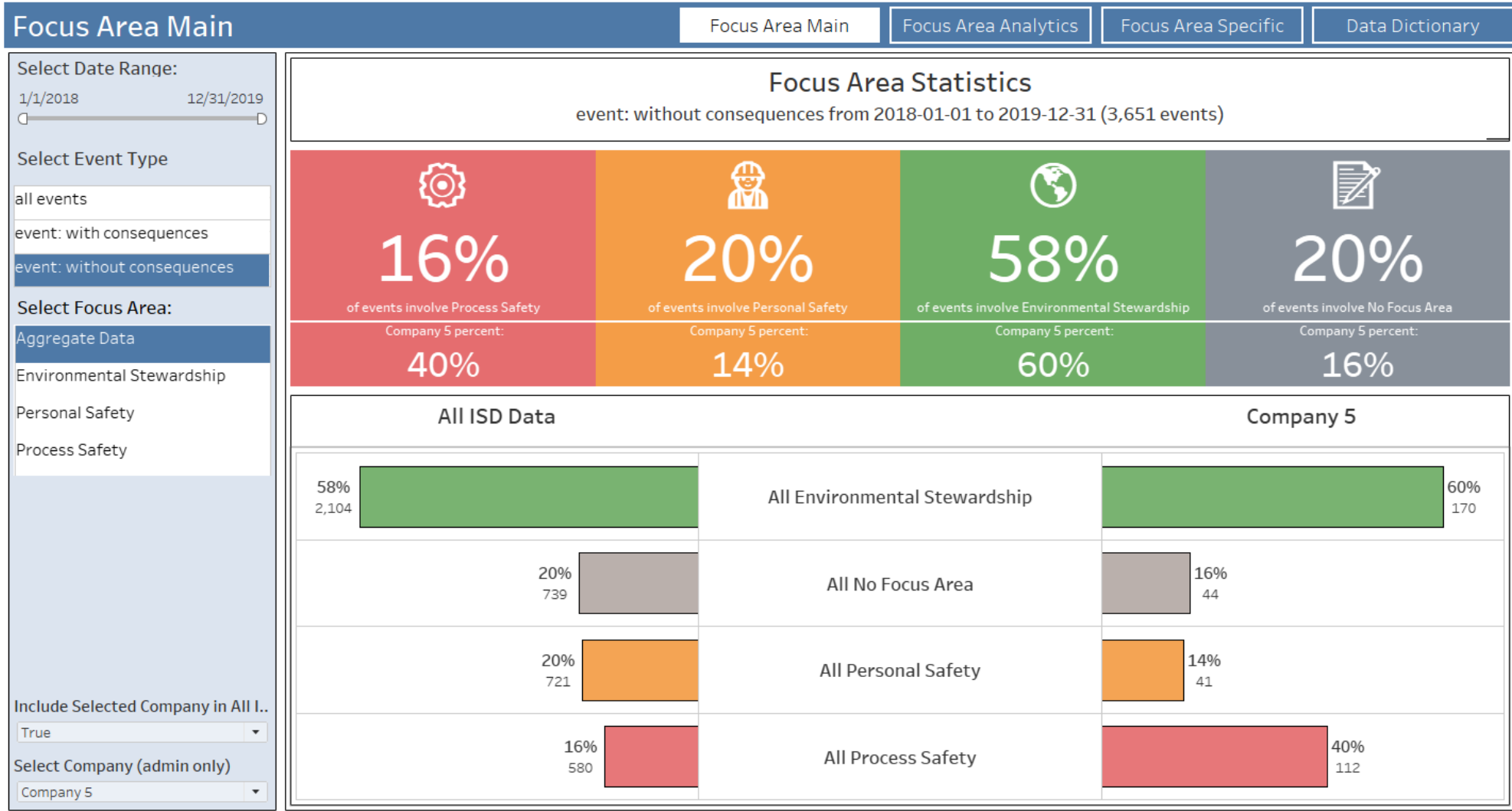- participant can view characteristics of their data vs. aggregate

Public dashboard

- industry aggregate
- available to all

- SafeOCS uses dashboards as a means of disseminating aggregated data with participants and other stakeholders

- Selected filters:
  - Event Details
  - Work/Location Types
  - Event Categories
  - Causal Factors

- Coverage: CY18 – CY20

- Recent updates
  - Added data quarterly
  - Improved clarity of denominators
  - Improved ease of use of secondary filters

SafeOCS ISD Participant Dashboard

Note: Synthetic data shown

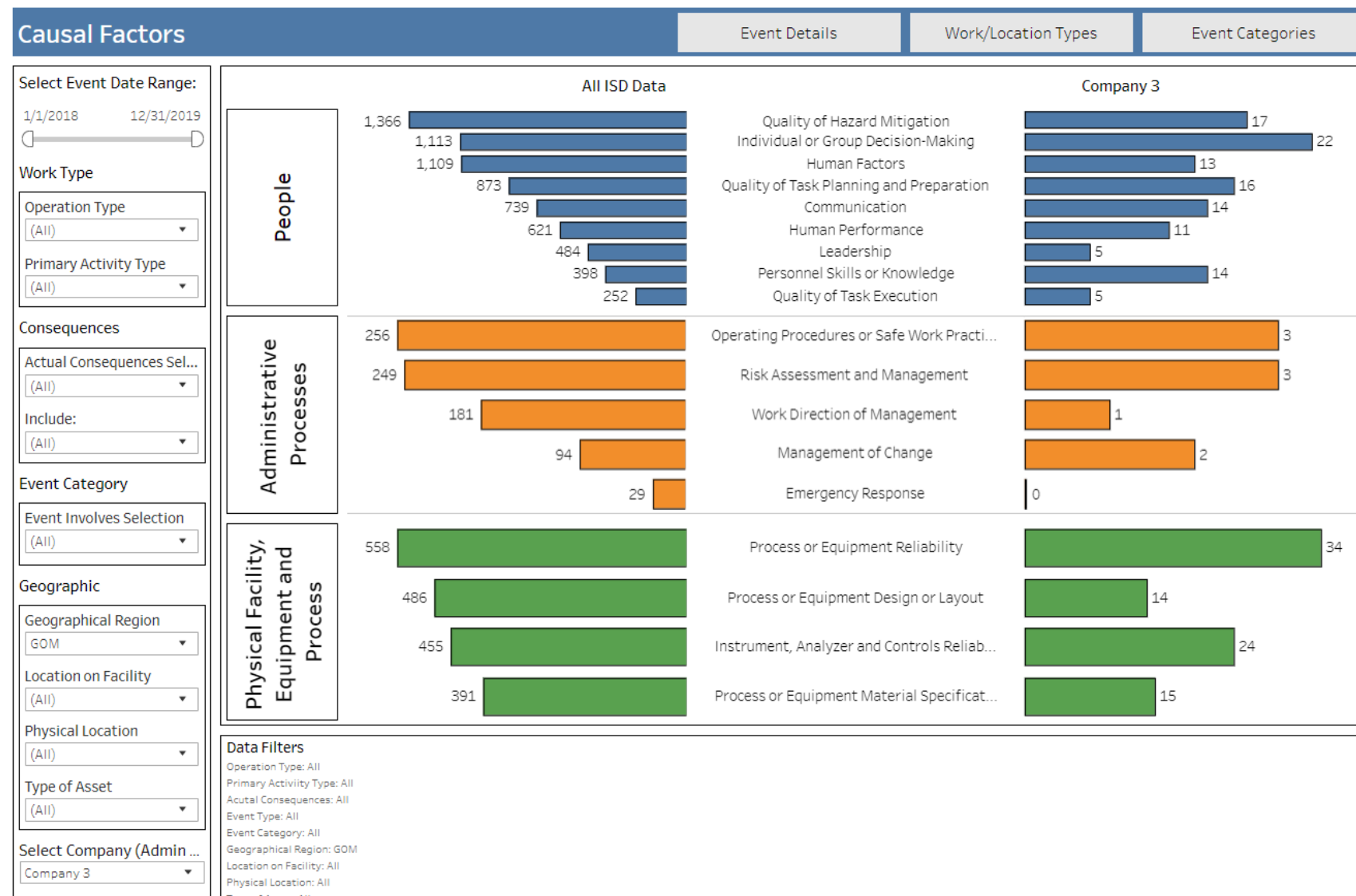# SafeOCS ISD Participant Dashboard – Data Analysis

Interface for Participant (behind login) to view characteristics of their data vs. aggregate (based on filters).
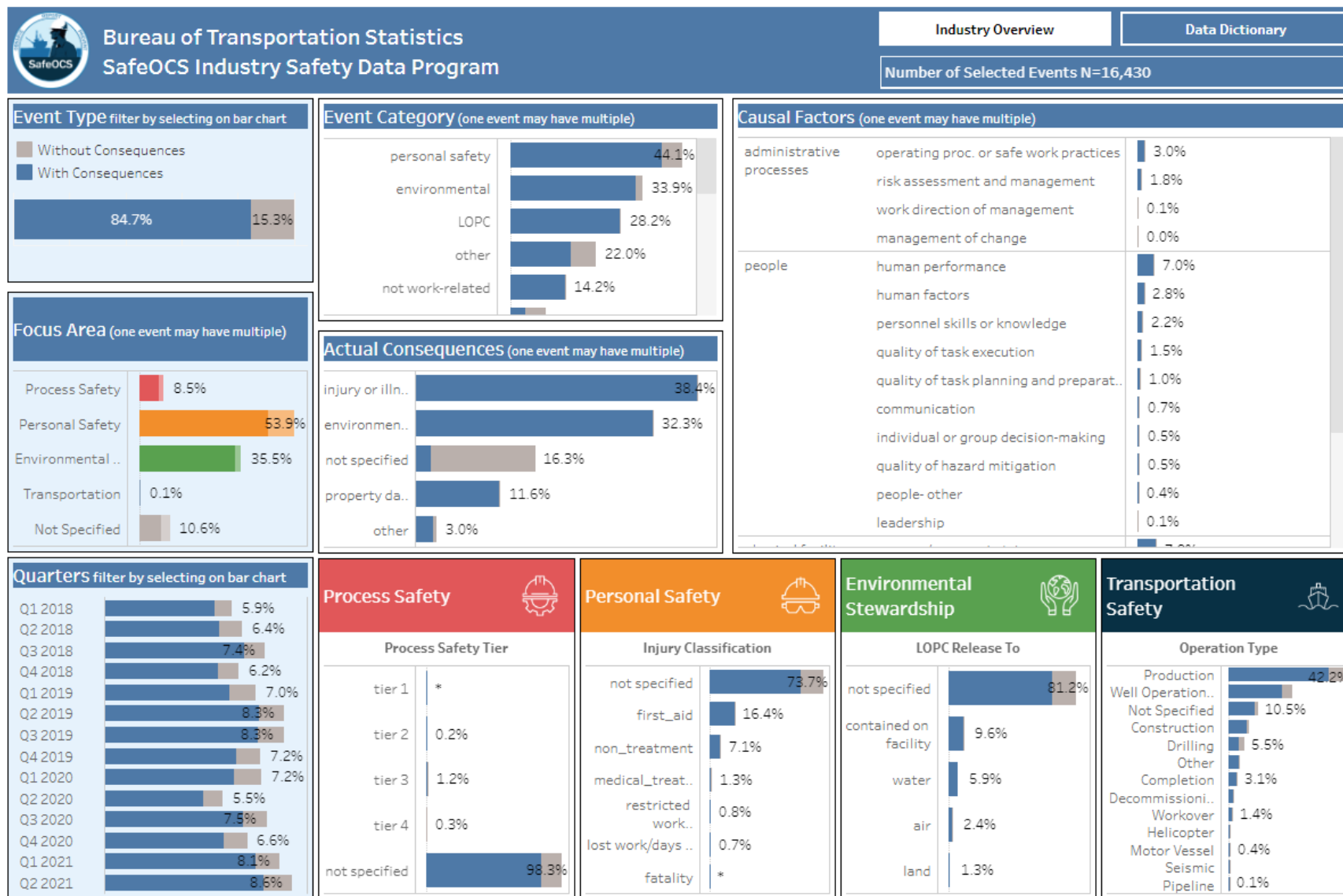
Views:

- Event Details

- Work/Location Types

- Event Categories

- Causal Factors

Note: Synthetic data shown

SafeOCS ISD Public Dashboard

Note: Represents actual data captured as of June 2022 https://www.safeocs.gov/sdp/dashboard/

Memorandum of Agreement

- Each Agreement details scope of engagement between company and BTS:
  - type of data to be submitted (i.e., reportable incidents, near misses, etc.),
  - event date ranges (i.e., number of years) of submitted data,
  - format of the database to be provided to BTS (i.e., use existing data input form or a company-specific format), and
  - company's expectations regarding data review and analysis.

- Appendix C – NDA form – not required unless joining BTS Data Review Team or Work Group

- Upon execution of MOA, companies can register on SafeOCS website to upload data
  - Select program
  - Follow the instructions for transferring data to BTS secure data system
  - To ensure CIPSEA protection, data not accepted unless submitted via portal

Current Focus and Next Steps

- Continue dialogue with participants on prospective program enhancements
  - Identify and prioritize areas of interest involving data, participation, and use

- Current Focus
  - Continue outreach efforts, including orientation workshops
  - Establish company-specific data protocols to support effective data mapping to SafeOCS for new participants
  - Pursue enhancements to dashboards to allow companies to view own data, compare against aggregated industry results, and share analyses with management

- Next Steps
  - Establish participant ad hoc work groups to expand scope of data fields captured to further support industry needs and leverage current industry efforts, improve data quality, communication of learnings, and address external and internal stakeholder needs
  - Consider offshore renewable energy, marine/pipeline sectors, and onshore oil & gas

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SafeOCS: **www.safeocs.gov**

Ad Hoc Work Groups

- BTS uses these to obtain information or viewpoints from stakeholders with relevant expertise.
    - Ad hoc, unstructured, time-limited
    - Address a single, focused endeavor

- Led by BTS SafeOCS Program Manager or designee

- Data confidentiality protections are available for work group data as needed

- Previous ad hoc work groups:
    - Default rules for focus areas
    - Data dashboards

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Ad Hoc Work Groups

Two cornerstones to ensuring success of SafeOCS ISD program include:
1. confidentiality protections offered under CIPSEA, and
2. ensuring that ISD program is reflective is of industry needs and input

The governance model developed to achieve the second cornerstone includes the use of topic-specific, ad hoc work groups as a means for ensuring alignment with industry feedback and expectations. As the need arises, BTS will establish these ad hoc work groups consisting of appropriate industry representatives, as deemed appropriate, to discuss issues or questions related to specific core data fields or program logistics.

Any work groups that are established will be led by the BTS SafeOCS Program Manager (or designee). If the subject of the discussion will involve aggregated industry data, work group participants must also be designated as agents under CIPSEA and must have signed Non-Disclosure Agreements (NDAs). These work groups may consist of BTS staff members, BTS independent subject matter experts (SMEs), company SMEs, and others as deemed appropriate by BTS. Work group team members are selected from participating companies that are actively submitting data to the SafeOCS ISD program; BTS will ensure that participants represent a cross-section of industry companies.