



Work Authorization CoW Technical Standard

Version	Date	Approver
1.0	March 31, 2024	JO EHS

Introduction

Work Authorization facilitates the agreement and communication of the conditions for carrying out work safely between persons in operational control and person(s) performing work.

Requirements

The following sections provide minimum requirements for Work Authorization as well as supporting guidance to clarify the intent of those requirements.

- Requirements **shall** be met.

<p>1. Requirement: Guidance:</p>	<p>Work Authorization is divided into two categories: Permit Required and Permit Not Required (PNR).</p> <p>Permit Required work includes, but is not limited to:</p> <ul style="list-style-type: none">• Tasks requiring a permit in accordance with the associated Control of Work Technical Standards.• Additional tasks that JO has designated as requiring a permit. <p>Work that does not meet the Permit Required requirements shall be authorized and controlled using the Permit Not Required (PNR) System.</p> <ul style="list-style-type: none">• Refer to Appendix A for additional guidance on Permit Required versus Permit Not Required (PNR) tasks and how they are managed. PNR will not be utilized until JO fully implement electronic permit.• If a CoW Technical standard allows for “equivalent documentation” in lieu of a permit, that equivalent documentation fulfills the requirements of a permit in this standard. If associated tasks require a permit and do not allow for “equivalent documentation” a Permit to Work is required for those tasks.• The Work Authorization system can be documented by either a paper-based process or electronic tool.
<p>2. Requirement:</p>	<p>Work Authorization includes review and approval of work, including but not limited to:</p> <ul style="list-style-type: none">• Review of Control of Work documentation and worksite conditions.

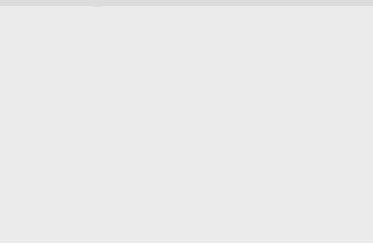
<p>Guidance</p>	<ul style="list-style-type: none"> ○ Tasks and hazards shall be identified and addressed, including application and verification of controls. ○ Control of Work documentation (if applicable) shall be acknowledged, reviewed, and signed. ▪ JO shall identify tasks that require a high-level approver. ○ Work shall not commence until Work Authorization has been granted. • Notification to persons in control of operational activities of the work to occur in their area. Requirements for managing, approving, accepting, and closing out permitted work at remote locations. • Consider the resources required to implement the permit-to-work system effectively. For example, adequate time is needed to check site conditions. High hazard or complex tasks may require a greater degree of monitoring and limit the number of permits a single Permit Approver and Permit Holder can manage at one time. Permit approver & holder can delegate low risk activities to other competent personnel to focus more on managing limited number of high-risk activities. • A high-level approver may be required: <ul style="list-style-type: none"> ○ For high-consequence work, as determined by JO leadership. ○ To deviate from a requirement of the CoW standards. Instances where this is acceptable are identified in the CoW Technical Standards. • Consider a process for assuring that the person(s) in charge of a facility, unit, plant, installation, work location, etc., are aware that potentially high-consequence work will be conducted. Consideration of the number and level of signatures required for a work permit. Signatures should be required only when they add value to the safety of the task.
<p>3</p>	<p>Requirement: Self-permitting shall not be allowed.</p> <ul style="list-style-type: none"> • Permit Approver and Permit Holder shall be two separate individuals. <p>Permit Approver shall not be an active participant on the work crew.</p>
<p>Guidance:</p>	<p>JO does not allow for self-permitting due to Human and Organization Performance factors that could hinder the persons involved in the Work Authorization process from sufficiently identifying and addressing risk factors and their mitigative actions. For example, hazards may be overlooked or improperly assessed if:</p> <ul style="list-style-type: none"> ○ Permit Approver and Permit Holder are members of the same work team or have been in the recent past.

<p>4.</p>	<p>Requirement</p> <p>Permits shall include the following information at a minimum:</p> <ul style="list-style-type: none"> • Defined work scope. • Control of Work documentation required. • Restrictions and controls required. • Permit duration. • Gas testing results, in accordance with Technical Standards (JOSOPs). <p>Work Authorization approvals.</p>
<p>Guidance:</p>	<ul style="list-style-type: none"> • Permits can be documented with a paper-based tool or electronic tool. • A defined work scope may include, but is not limited to: <ul style="list-style-type: none"> ○ Short description of the work to be performed. ○ Location/boundaries of where the work will be performed. ○ Equipment to be worked on. ○ Name of Company/Person(s) responsible for conducting the work. ○ Emergency contact details
<p>5.</p>	<p>Requirement:</p> <p>Approval of the work permit requires the Permit Approver and Permit Holder to assess the jobsite to verify approved boundaries and conditions are in place.</p>
<p>Guidance:</p>	<p>The assessment of the jobsite may be accomplished remotely in remote area which is defined as a site/area that is unmanned or is not readily accessible.</p> <p>Permits and work plans that are approved remotely (e.g. via telephone, handheld device, electronic PTW system, etc.) must meet the following additional requirements:</p> <ul style="list-style-type: none"> ○ The onsite work team leader, responsible for generating permits and work plans at the remote location, must be trained. ○ The Authorized Remote Permit Approver (i.e. not located at the immediate worksite) must be knowledgeable about the worksite location and the type of work being conducted. ○ The onsite work team leader must document the date and time approval is received and the name of the Authorized Remote Permit Approver on the permits (in the permit approver section) and work plans. Self-permitting is never allowed.

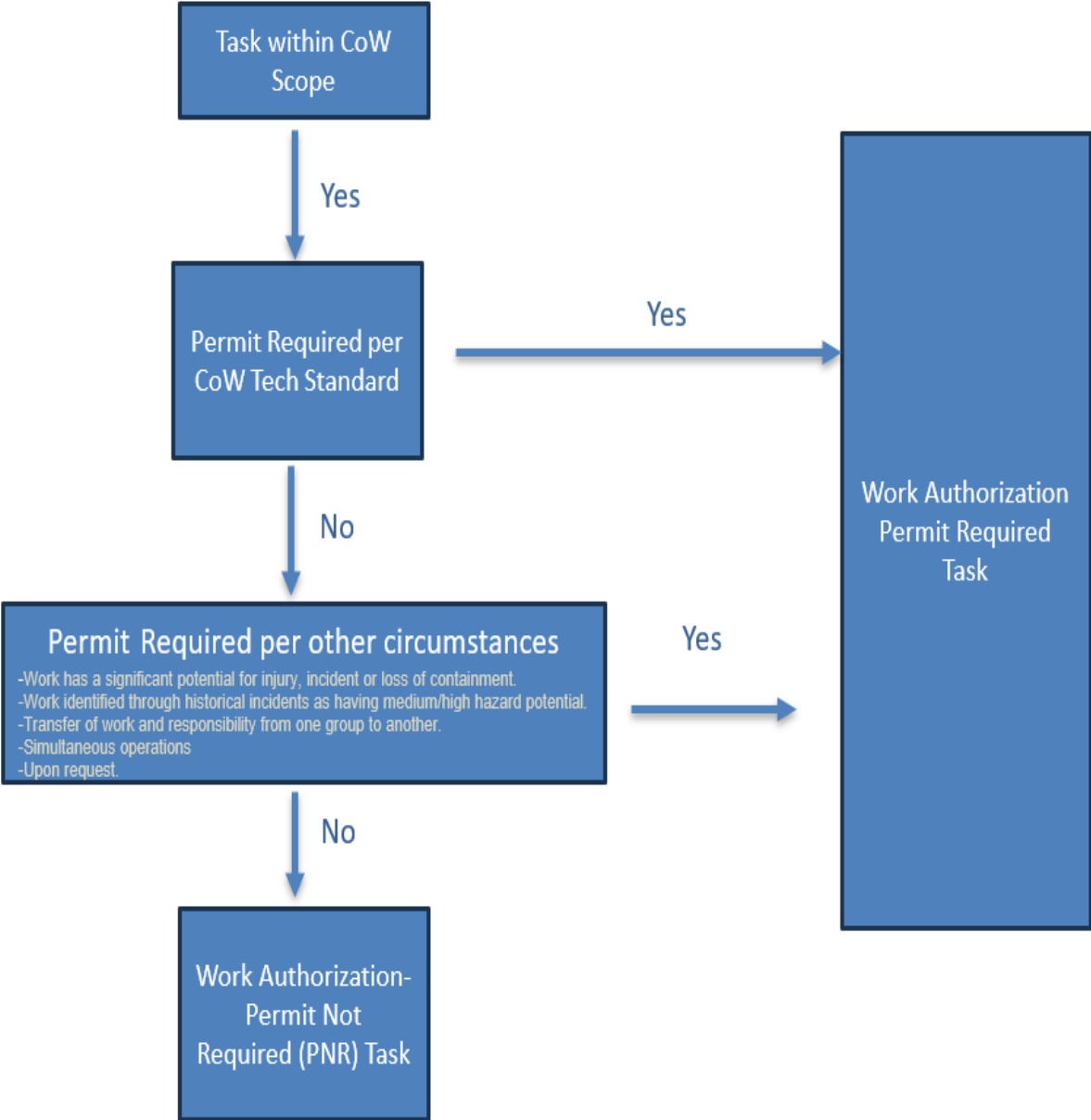
<p>6.</p>	<p>Requirement: Permits shall have a maximum initial duration of 8 hours for all JO activities working on 8 hour-shifts.</p> <p>Any drilling, workover, and well work activities can utilize permits for a maximum initial duration of 12 hours.</p> <p>Permits extending beyond initial duration require revalidation.</p> <p>JO shall develop a process for revalidating permits that includes at a minimum:</p> <ul style="list-style-type: none"> • Minimum required activities performed by permit approver and permit holder to revalidate a permit, including assessment of the jobsite to confirm that approved boundaries and conditions listed in the Control of Work documentation are in place and functioning, and to identify and mitigate any new hazards not previously addressed. • The task does not resume until the Permit Approver and Permit Holder have revalidated the CoW Documentation. • Communication between incoming and outgoing Permit Approvers and Permit Holders regarding the status of the work-in-progress. • Identification of scenarios where the Permit Holder is allowed to revalidate a permit without the input and signature acknowledgement of a permit approver.
<p>Guidance:</p>	<ul style="list-style-type: none"> • Permit revalidation is a confirmation that all the conditions and requirements of an existing permit are still in place if the work extend beyond initial shift hours. • A permit/work plan will be revalidated to check work scope and working conditions documented on the permit(s)/work plan remain the same <u>and</u> hazards have been eliminated and/or mitigated. • The shift handover procedure may include communication mechanisms between incoming and outgoing shifts to ensure proper oversight and revalidation of work permits. • Revalidation includes assessment of SIMOPS before revalidating work permits. • Revalidation must only be made by the onsite work team leader/permit user and area controller. • The onsite work team leader/permit user and area controller must sign and date the permit (and if necessary, update the validity date/time) each time the permit is revalidated.

<p>7. Requirement:</p>	<p>JO shall define how permits will be managed for changes in conditions, including but not limited to:</p> <ul style="list-style-type: none"> • Handovers between personnel associated with the work (e.g., Permit Approver, Permit Holder, work crew). • Interruption of work and permit suspension (e.g., emergency/alarm, essential signatory leaves without approved replacement). • Changes in work conditions or scope from those specified on the Permit and any associated Control of Work documentation. • Delays in start of work (e.g., where gas testing is required). • New or previously unrecognized unsafe conditions or hazards. • Approved boundaries or conditions are no longer met. <p>Stop Work Authority (SWA).</p>
<p>Guidance:</p>	<ul style="list-style-type: none"> • If condition changes, crew should be prepared to stop work, and report changed conditions immediately to the Work Team Leader and the Area Controller, as applicable. • Permit has to be revalidated and hazard analysis shall be revisited. • Handover procedures may address communication of the status of outstanding work/tasks to incoming shift/crew. • Procedures or instructions may address putting work-in-progress into a condition that can be readily communicated to, and understood by, the oncoming shift/crew. • The Work Authorization Process may include a process for managing change, including the evaluation of changes in other planned activity, a determination of when hazards need to be reassessed, and a means for communication of the change to affected personnel (e.g., person(s) performing work, functional groups, person(s) in operational control). • Conditions triggering the suspension of a work permit may include: <ul style="list-style-type: none"> ○ Recognition of new or previously unrecognized hazards which were not identified and mitigated in the hazard analysis. ○ Occurrence of an event at the jobsite or adjacent work area. ○ A general alarm or emergency. ○ A conflict arises with another scope of work. ○ The Permit Holder leaves the jobsite. • Suspended work permits may be kept in the Permit system (e.g., paper log or electronic tool). <ul style="list-style-type: none"> ○ Suspended permits are not required to be cancelled but may require revalidation per

	<p>the permit revalidation requirements prior to continuing work.</p> <ul style="list-style-type: none"> ○ The condition of the work site at the time of work suspension may be described, and the consequences for any other activities may be specified. ○ When work is suspended, the integrity of controls and security of any isolation may be considered, and the unit/process/facility/job site may be restricted from normal or other use.
<p>8. Requirement:</p>	<p>Close out of Work Authorization requires at a minimum:</p> <ul style="list-style-type: none"> • Work has been verified as completed or appropriately suspended. • Persons in control of operational activities have been notified that the site and/or equipment has been returned to their control. • Required Control of Work documentation is returned to the point of issue. • Completions or suspension of the work and the status of the site and equipment is communicated to affected personnel.
<p>9. Requirement:</p>	<p>JO shall define conditions for authorizing and closing out PNR tasks.</p>
<p>Guidance:</p>	<ul style="list-style-type: none"> • Refer to Appendix A for additional guidance on Permit Required versus Permit Not Required (PNR) tasks and how they are managed. • PNR will not be utilized until JO fully implement electronic permit. • Conditions for approving and accepting tasks controlled under PNR may include: <ul style="list-style-type: none"> ○ A procedure or instruction for approving and accepting PNR tasks (e.g., hazard analysis, procedure, start-of-shift meeting). ○ System of record (e.g., unit log, electronic permitting tool, etc.). ○ Verification of workforce training and competency, including completion of site-specific safety inductions or orientations. ○ Any other condition determined by the JO. • Conditions triggering the suspension of PNR work may include: <ul style="list-style-type: none"> ○ New or previously unrecognized hazards have been identified which were not identified and mitigated in the hazard analysis.

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- An event occurs at the jobsite
 - There is a general alarm or emergency
 - Work exceeds duration, scope, or conditions

Appendix A: Permit Required / Permit Not Required (PNR)



Permits/Work Plans are Required Under the Following Circumstances	Examples (including but not limited to)
Work has a significant potential for injury, incident or loss of containment. (Permit(s))	<ul style="list-style-type: none"> • Work involving breaking into a line, equipment or vessel • Specialized work (e.g. confined space entry, hot work, excavation, diving, complex lifts, etc.)
Work identified through historical incidents as having medium/high hazard potential. (Permit(s))	<ul style="list-style-type: none"> • Vacuum truck operations involving highly volatile liquids and/or other flammable, explosive material • Work requiring fall protection
Transfer of work and responsibility from one group to another. (Permit(s))	<ul style="list-style-type: none"> • Transfer of work between crafts/trades • Transfer of work between contract companies • Transfer of work between contract companies and WJO
Simultaneous operations (SIMOPs). (Work Plan(s))	<ul style="list-style-type: none"> • Operations and maintenance activities taking place in the same area • Construction and operations activities taking place in the same area • Production and drilling operations taking place at the same location
Upon request. (Permit(s) and/or Work Plan(s))	<ul style="list-style-type: none"> • Area Controller • Person Managing Control of Work (<i>PMCoW</i>) • Any member of the work team

Appendix B: Roles and responsibilities

Role	Definition	Responsibilities
Permit Approver	<p>An individual that has been trained, qualified, and authorized by the company to approve work within their area of responsibility.</p> <p>The Permit Approver's role and responsibilities can be delegated, at JO leadership discretion and based on applicable regulatory requirements.</p> <p>The Permit Approver and the Permit Holder are always two different individuals. Self-approving work, also known as self-permitting, is strictly prohibited.</p>	<ul style="list-style-type: none"> • Identify, communicate, mitigate, and control hazards associated with work that has the potential to adversely impact workforce safety and health. • Provide and assign area controller (the appropriate level of oversight) including frequency of revalidation, for all work taking place in their designated area of responsibility. • Review the work plans, hazard analysis and associated work authorizations, and when applicable, isolation certificates for SIMOPs conflicts. • Conduct the site hazard assessment and approve the work authorization after verification that all conditions have been met and identified controls are in place and functioning.
High-level approver	<p>Person with the competency and authority to make a risk-based evaluation and determine whether proposed deviations from a CoW requirement and alternate controls adequately reduce risk and allow safe execution of work.</p> <p>JOs shall determine the appropriate organizational level of "high-level approvers" based upon the risk of the task, requirement, and/or deviation. For example, a Head Operator may not be the appropriate high-level approver for a lift over live critical process equipment.</p>	<ul style="list-style-type: none"> • Review and approve work for high-consequence work identified by JO leadership, or for work that requires deviations from safe work procedures.
Permit Holder	<p>The Permit Holder is the person designated to accept approval conditions and control work within their area of responsibility.</p> <p>The Permit Approver and the Permit Holder are always two different individuals. Self-approving work, also known as self-permitting, is strictly prohibited.</p>	<ul style="list-style-type: none"> • Identify, communicate, mitigate, and control hazards associated with work that has the potential to adversely impact workforce safety and health. • Safely execute work scope with persons performing work. • Conduct pre-job brief and communicate scope of work and hazard analysis to persons performing work. • Close out work authorizations indicating task completion status.

Person performing work	An individual contributor responsible for the safe completion of the task.	<ul style="list-style-type: none"> • Attend pre-job brief and acknowledge scope of work, hazards, mitigations, and controls • Safety execute work scope within the parameters of Control of Work documentation • Execute Stop Work Authority (SWA) if work execution deviates from work scope. • Participate in Post Job Reviews (PJR)
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Appendix C: References

American Fuel & Petrochemical Manufacturers (AFPM)

Practice Sharing Establishing Scope of Activities Managed Outside of a Permit to Work Document

American Petroleum Institute (API)

Recommended Practice 75 Safety and Environmental Management System for Offshore Operations and Assets
 Recommended Practice 76 Contractor Safety Management for Oil and Gas Drilling and Production Operations

Health & Safety Executive (HSE)

HSG 250 Guidance on permit-to-work systems

International Association of Oil & Gas Producers (IOGP)

Report No. 6.29/189 Guidelines on permit to work (P.T.W.) systems Report No. 459
 Life-Saving Rules

International Organization for Standardization (ISO)

ISO 45001:2018 Occupational health and safety management systems - Requirements with guidance for use

Occupational Safety & Health Administration (OSHA)

OSHA 3071 Job Hazard Analysis

U.S. Department of Energy (DOE)

DOE-HDBK-1028-2009 Human Performance Improvement Handbook