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Section 31.0 WORK PERMITS

A. Purpose

The purpose of this procedure is to establish formal guidelines for **JAGUAR ENERGY SERVICES**, **LLC** personnel who perform work activities at customer worksites.

This will aid in enabling effective communications regarding the planning, preparation, and execution of a specific task.

B. Scope

A work permit is not normally required when personnel work on equipment which they operate or are in control of, and the work is performed in an area which they control.

Work performed in specific locations may be designated as areas not requiring permits unless the nature of the work being performed requires one.

This procedure applies to many jobs involving work performed by **JAGUAR ENERGY SERVICES**, **LLC** personnel at customer worksites.

C. Responsibilities

- 1. The Safety Coordinator or his/her designee responsible for ensuring that employees have completed the training required by this procedure.
 - (a) Additional responsibilities include:
 - (i) Ensuring that employees have been properly trained.
 - (ii) The implementation of this Policy.
 - (iii) Take corrective actions on all violations or suspected violations of this procedure.
 - (iv) Documentation of completion by each employee.
 - (v) Ensuring that this procedure is followed in work done at a client's location or a **JAGUAR ENERGY SERVICES, LLC** shop.

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- (vi) Ensuring that proper records are maintained on all work done that requires a Work Permit
 (vii) Providing appropriate safety equipment to JAGUAR ENERGY SERVICES, LLC personnel.
- 2. The Supervisor is responsible for providing assistance in the implementation of this policy.
 - (a) Additional responsibilities include:
 - (i) Informing the Safety Director of any incidents involving Work Permits.
 - (ii) Making suggestions to management for ways to improve this Policy.
- JAGUAR ENERGY SERVICES, LLC personnel are responsible for ensuring that they obtain the initial training on work procedures, the permitting process.
 - (a) Additional responsibilities include:
 - (i) Complying with this procedure.
 - (ii) Obtaining a permit from the customer before beginning any work requiring a permit.

D. Procedure

A Work Permit is a signed document that establishes the safety requirements for the customer and the permit recipient.

- 1. Customers normally require a permit for hot work, because special precautions are needed to safely perform the work.
- 2. The permit ensures that the supervisor responsible for the work area knows that the work will be performed, and has approved the work as well as the safety measures being used.
- 3. A Work Permit provides a method for authorizing work on specific equipment operated by someone else, or to work in an area controlled by someone else.
- 4. A Work Permit is used to identify a specific task, show the assessment of hazards related to the task, specify the method to

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eliminate, control, or manage the hazards related to the task, and identify those accountable for performing the task.

- (a) The customer's procedure takes precedence, unless **JAGUAR ENERGY SERVICES, LLC**'s procedure is more stringent.
- (b) **JAGUAR ENERGY SERVICES, LLC** personnel may not conduct Hot Work or Permit activities for which they have not been trained.
- (c) **JAGUAR ENERGY SERVICES, LLC** personnel must follow this procedure and local customer hot work procedures.
- (d) Hot work permits can vary in content.
- 5. Through a signed permit, the customer generally agrees to prepare and monitor equipment or a work area in the manner stated on the permit so that the specified work can be safely performed.
- 6. Additional customer responsibilities can include the following:
 - (a) Inspecting the work area.
 - (b) Assessing for job hazards.
 - (c) Ensuring hazard control methods listed on the permit are adequate.
 - (d) Ensuring that the correct precautions are indicated on the permit to safely perform the work.
- 7. As permit recipients, **JAGUAR ENERGY SERVICES**, **LLC** personnel are responsible for the following:
 - (a) Performing only the permitted work at the designated times.
 - (b) Working safely and according to permit requirements.
 - (c) Performing duties as required by the permit, for example, fire watch.
 - (d) Leaving the work area clean and in an orderly condition.
 - (e) Return the permit to the customer upon the completion of the job or upon expiration of the permit.
 - (f) Attaching a copy of the original permit to the CSA.
 - (g) Informing the customer immediately, if they do not have the required skills or equipment to adhere to all conditions on the permit.

8. Types of Areas Requiring Permits

Permits are required when performing mechanical work in process units, tank farms, buildings, fabrication areas, shop buildings

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adjacent to or within process unit battery limits, etc., that are controlled, or are under the accountability, of someone other than the person performing the work.

9. Locations Not Requiring Permits

Areas which do not normally require a Work Permit for work performed on properly prepared equipment will be designated by the client's safety department.

10. Work Not Normally Requiring a Permit

- (a) Routine work performed by process operators including inspections and maintenance on process equipment which they normally operate and control do not normally require a written Work Permit.
- (b) Routine work performed by mechanics including inspections and maintenance on mechanical equipment, which they normally operate and control, may normally be worked on without a permit.
- (c) Repairmen and electricians may perform daily maintenance on pumps, valves, etc., if the equipment guards are not removed or work does not intrude the equipment, by communicating with the operator.
 - (i) Other routine maintenance work may require a permit.
- (d) Work performed in designated shops on equipment integral to, and considered as a part of, the shop does not normally require a permit unless the equipment needs to be locked out, or is considered to be a confined space.
- (e) Work on equipment imported into a designated shop from other locations does not normally require a permit, when the equipment has been properly prepared for the work that is to be performed.
- (f) Work performed by contractors in the compound areas located outside of process areas.
- (g) When work is performed on new equipment, or equipment has been properly prepared for the work to be performed, it does not require a Work Permit.
- (h) Work performed by technicians or laboratory personnel does not normally require a permit, when the work is performed in their normal work location, or when procedures are in place to cover sampling of materials from equipment which is in the control of others.

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11. Work Normally Requiring a Permit

Work Permits are normally required for certain types of work performed on equipment or in hazardous areas.

- (a) Examples of such requirements are:
 - (i) Work performed in a confined space.
 - (ii) Work requiring energy isolation.
 - (iii) When work is to be performed by someone other than the person who operates the equipment.
 - (iv) Work that may adversely impact or create hazards for other personnel or other parts of the operation.
 - (v) Entering tanks, vessels, or confined spaces where toxic gas or hydrocarbon vapor could accumulate (sewer boxes, electrical vaults, etc.).
 - (vi) Opening lines or equipment.
 - (vii) Employees other than operating personnel assigned to the unit, alter the function or operation of operating equipment.
 - (viii) Creating a potential hazard in an operating area to depressurize equipment, relief valve maintenance, etc.
 - (ix) Any employee working in a restricted overhead location in the process unit while such unit is in operation (internal maintenance of vessels, cooling towers).
 - (x) Work performed with radioactive material or equipment.

12. Accountability for Having Permits

The accountability for having a permit rests with the individual performing the job.

- (a) Individuals working on a job covered by a permit obtained by another person must initial the back of the original permit, indicating their understanding of the permit scope and restrictions.
- (b) The person obtaining the permit shall inform other individuals on the job of the scope and/or restrictions as shown on the permit.
- (c) The type of work to be performed determines the type of permit to be issued.
- (d) The person requesting the permit is accountable for determining the type of work to be performed.

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(e) The person accountable for issuing the permit, will determine when the equipment and the area are approved for the type of work requested.

13. Types of Permits

- (a) A Cold Work Permit is required for work performed on equipment operated or controlled by someone other than the person doing the work and for bodily entry into an ordinary confined space, when the nature of the work being performed does not involve a likely source of ignition or bodily entry into a Permit Required Confined Space.
- (b) A Hot Work Permit is required when work being performed will, or is likely to, cause a source of ignition.
 - (i) Some tasks may require additional procedures to complete. (sandblasting, welding, etc.)
- (c) Permit Required Confined Space Entry
 - (i) There are two types of confined spaces, ordinary confined spaces and permit required confined spaces, as defined by OSHA. (29 CFR 1910.146)
 - (ii) An ordinary confined space is defined:
 - (i) As any space where the work being performed causes a person to place his/her head or any other part of his/her body inside a space that is not meant for human occupancy.
 - (ii) Has a limited means for entry and exit.
 - (iii) Prevents the individual from being aware of the environment outside of the confined space.
 - (iii) Permitting for bodily entry into an ordinary confined space can be accomplished by completing the appropriate cold work or hot work permit.
- (d) A Permit Required Confined Space, as defined by OSHA 29 CFR 1910.146, is a confined space that also has one or more of the following characteristics:
 - (i) Contains, or has the potential to contain, a hazardous atmosphere.
 - (ii) Contains material that has the potential for engulfment of an entrant.
 - (iii) Has an internal configuration such that an entrant could become trapped or asphyxiated

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by inwardly converging walls or by a floor that tapers downward to a smaller section

- (iv) Contains any other recognized serious safety or health hazard.
- (e) These spaces although few in number, require that additional items be checked before allowing entry into these spaces.
 - (i) They include:
 - (i) Tracking the individuals going in and coming out of the space.
 - (ii) Testing the atmosphere inside the space.
 - (iii) Availability of rescue equipment.
 - (iv) Refer to Section 39.0 for more details.

14. Time Span of Permits

Permits shall be made for a specified length of time. When that time expires, work must stop unless the time on the permit is extended by the client representative.

- (a) A permit may be extended to cover three consecutive shifts providing the total time of the permit does not exceed 24 consecutive hours, and the work authorized by the permit has not been discontinued or left unattended during that time.
- (b) Work shall not be considered to be left unattended by workmen for short periods such as breaks or lunch provided the client is notified when the workmen leave the jobsite.
- (c) Prior to any workmen returning to the jobsite following breaks or lunch, the individual with the original permit shall receive verbal verification from the client representative that the conditions on the permit have remained the same.
- (d) The client representative is accountable for verifying the work-site continues to be approved for work.

15. Seeking Assistance for Permit Requirements

When either the operator accountable for issuing a permit or the individual performing the work is doubtful about the safety requirements or hazards associated with the task, both should obtain direction from the client or his/her representative.

(a) When the work is unique and a specific written procedure does not exist, the client representative or the person performing the work shall seek approval from the client.

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- (i) All parties concerned shall evaluate the work against existing procedures.
- (ii) If an agreement cannot be reached for the work to continue, they shall seek approval from the client and District Manager.

16. Request for Permits

Request for permits shall be made to the client representative or controller of equipment to be worked on.

- (a) Sufficient time shall be allotted for checking the job, preparing the equipment, and preparation of the permit, before the work is to be started.
- (b) When unexpected or unscheduled work is assigned, the person assigning the work is accountable for completing the permit request and delivering it to the appropriate personnel.
- (c) The request shall specify the time the work is actually expected to start.
- (d) When multiple permit requests are made for work in the same area, the person issuing the permits will use judgment to determine the priority for which work can be permitted.
- (e) The person requesting the permit is accountable for learning where the permit request shall be delivered.

17. Permit Preparation

Permits are valid for the specified periods of time shown on the permit.

- (a) Specific conditions of the equipment relevant to the task and the conditions of the environment where the task will be performed are also included on the permit.
- (b) Permits shall be prepared by personnel who normally operate or control the equipment, and the area where the equipment is located.
- (c) Permits require signatures of the operator and the individual performing the job or his/her foreman.
- (d) All other persons performing work under the permit are required to initial the back of the original permit.
- (e) When the person who is accountable for issuing the permit considers the scope of the permit to be beyond his/her/her authority or if the work conditions are uniquely hazardous, then he will contact his/her supervisor for advice.

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- (f) The client's representative in charge will be required to sign permits, when the work to be performed involves the direct contact between the employee and exposed electrical conductors or energized equipment of 480 volts or greater.
- (g) Electrician troubleshooters may check energized electric equipment while in service, and when the power source is less than 480 volts without the signatures of the client's representative in charge.
- (h) Hot taps on equipment in service require the approval of the Client's representative prior to work being performed.
- (i) The client is accountable to determine if underground electrical service exists in the location of the work to be performed, that requires busting of concrete or digging in the ground.
- (j) Permits authorizing work which extends beyond one area of jurisdiction into another shall be signed by the client's representative from each area where the work is being performed.

18. Issuing Permits

- (a) Those approving, issuing, or obtaining safety permits shall assure themselves that the work planned can be done safely under the circumstances which exist or which can be reasonably anticipated.
- (b) When conditions develop which require the temporary cancellation of safety permits, the person who issued the permit or the person that obtained the permit shall advise the workmen immediately and void the original copy of the permit.
- (c) When an employee has reason to believe that conditions under which the permit was issued have changed so as to create a potentially hazardous situation, the work shall be temporarily stopped and the information reported immediately to the person who issued or obtained the permit.
- (d) Permits should be signed and issued shortly before work is started.
- (e) Final decisions for issuing the permit must be based on the condition of the equipment and the surrounding environment. The following guidelines shall be used as a minimum to assess a job for safety, when preparing the job for a permit.
 - (i) The atmospheric conditions shall be evaluated to determine that electrical storms and high

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winds that will impact the job are not evident or anticipated during the time work is to be performed.

- (ii) Wind direction shall be checked to determine if a condition in another area will create a hazard where the Hot Work Permit is issued.
- (iii) Sewers and drains in the immediate area where work is to be performed shall be covered and sealed to prevent gas release.
- (iv) Workers performing the work are responsible for removing covers and plugs at the end of each day or immediately after the work is complete and immediately before the permit is voided.
- (v) Equipment covered by a Hot Work Permit must be free of flammable and combustible materials and cleaned of contaminants such as acid, caustics, etc.
- (vi) Piping, drums, towers, tanks, etc., must be depressurized, drained, purged free of oil, hydrocarbon vapors or other flammable materials, and isolated away from other parts of the process by installing blinds.
- (vii) Hot tap procedures shall be followed for hot work on equipment in service.
- (viii) Instruments shall be used to determine that the equipment is free of flammable vapors as a final check before issuing a Hot Work Permit.
- (ix) A visual inspection shall be made of the equipment to determine that it has been cleaned of oil, hydrocarbons, vapors, or other flammable materials before a Hot Work Permit may be issued.
- (x) Process lines or other equipment shall not be opened and samples shall not be taken in the area of a Hot Work Permit, when the lines contain hydrocarbons, flammable materials, or other materials that create a hazard when the Hot Work Permit is in effect.
- (xi) No equipment refueling is to be allowed while hot work is in progress.

19. Distribution of Permits

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- (a) The employee or Contractor who signs the original permit with the operator shall keep the permit available at the iobsite.
 - (i) Each person working on the job covered by the permit shall read the original permit and initial it on the back.
- (b) A carbon copy of the permit showing the signatures of the operator, client's employee, and Contractor shall be retained by the client signifying that the work has been Completed or Not Completed.

20. Operating Requirements

- (a) When workers are informed to stop work for the purpose of collecting samples, draining lines, opening equipment, etc., the Hot Work Permit shall be voided.
 - (i) A new permit may be issued for the work when the conditions have been reevaluated to determine the area is safe for work to resume.
- (b) Welding shall not be permitted on air lines while they are in service due to the potential for developing a combustible mixture of air and oil inside the equipment.
- (c) Process water lines must be purged with steam before welding or hot work is permitted on the piping or equipment.
- (d) Hot work shall not be allowed on cooling towers without approval from the Client's Operator or designated person.
- (e) Welding machines and their cable leads and ground cables and extension cords without explosion-proof connections, shall be placed in an area covered by a Hot Work Permit.
- (f) Before hot work is performed on a tank bottom which has contained hydrocarbons, a check must be made to determine that the area beneath the floor of the tank is safe for welding or cutting.
- (g) Special precautions shall be taken for tanks with double floors.
- (h) The equipment to be worked on shall be properly prepared for the work to be performed.
- (i) Other work underway or authorized in the area shall not be allowed to affect the safety of the particular job.
- (j) Operating employees are expected to:
 - (i) Give advice on potential hazards in conjunction with the job.
 - (ii) Be alert for operating upsets resulting from such work.

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- (iii) Be able to warn people in the area if subsequent hazards develop.
- (k) Under no circumstances, short of an emergency, should valves or equipment, which may affect operations, be manipulated or changed by any person without the knowledge of the operator.
- (I) Hot work is defined as any activity that produces open flame, sparks, or significant heat.
 - (i) The open flame, heat, or sparks can cause the ignition of flammable liquids, gases, or any other combustible matter.
 - (ii) Examples of hot work include:
 - (i) Acetylene/Gas Burning
 - (ii) Welding
 - (iii) Cutting
 - (iv) Grinding
 - (v) Annealing
 - (vi) Open Flames
 - (vii) Electric, Non-explosive Tools, Equipment and Motors
 - (viii) Sandblasting
 - (ix) Breaking Concrete
 - (x) Drilling
 - (xi) Chipping, Ripping, or Cutting by Impact
 - (xii) Soldering
 - (xiii) Operating Internal Combustion Engines
 - (xiv) Pressure Tapping Lines or Vessels
 - (xv) Repairing Energized Equipment
 - (xvi) Slugging
 - (xvii) Filing
- (m) When conducting hot work, **JAGUAR ENERGY SERVICES, LLC** must take special precautions to avoid starting a fire.
- (n) There are three major types of ignition sources:
 - (i) Hot Sparking (positive ignition)
 - (i) Open flames
 - (ii) Sparks
 - (iii) Extreme heat produced by welding, cutting, or burning
 - (ii) Warm Sparking
 - (i) Grinding wheels
 - (ii) Ground Fault Circuit Interrupters (GFCI's)
 - (iii) Extension Cords

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		(iv)	Electric Soldering	
		(v)	Non explosion proof electrical	
		(vi)	equipment Electric hand tools	
		` '		
		(vii)	Internal combustion engines	
		(viii)	Hot turbine external surfaces	
(iii)		Cold Sparking		
		(i)	Hack saws	
		(ii)	Cold chisels	
		(iii)	Hydro blasting guns or lances	
		(iv)	Air tools	
		(v)	Most hot work takes place in open	
			air where oxygen is always present.	
(o)		Avoiding exposure of combustibles to ignition sources such as sparks is the primary method of preventing fires.		
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- (p) JAGUAR ENERGY SERVICES, LLC personnel should contain sparks by covering sumps and drains.
- (q) Additionally, the following rules and guidelines apply to hot work:
 - (i) Remove any combustible or flammable material from the work area before starting the hot work.
 - (i) This includes any butane lighters or matches that may be in your pockets.
 - (ii) Use a flame retardant cover or similar material to protect nearby equipment, structures, or sump or drain openings from flying sparks or welding slag.
 - (iii) Ensure proper fire extinguishing equipment is nearby and ready for use.
 - (iv) Ensure a fire watch is posted during all hot work and at least 30 minutes after all hot work has ended.
 - (v) Wear appropriate protective clothing and personal protective equipment.
- (r) Do not perform hot work without a permit.
- (s) Locate eye wash stations and safety showers before beginning any hot work.
- (t) Read and be familiar with the local emergency bill.
- (u) Know the nearest assembly point in the event of a plant or unit emergency.
- (v) Know the procedure for notifying the customer of an emergency in your work area.

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21. Change in Either the Operators or the Individual Performing the Job

When new workmen start performing work covered by the permit, they shall first read and initial the permit.

(a) The client employee or **JAGUAR ENERGY SERVICES**, **LLC** person who signed the face of the original permit is accountable for informing any other person who works on the job of the permit requirements.

22. Work Completed

When the work covered by the permit is complete, **JAGUAR ENERGY SERVICES**, **LLC** person holding the original permit shall inform the client representative and request an inspection of the area and the equipment.

- (a) When the area and equipment is accepted as complete by the client representative, both shall sign the original permit as complete and show the time the permit is voided.
- (b) The original permit shall be fastened to the carbon copy and both shall be retained by the client.

23. Work Completed

- (a) When the work covered by the permit is not complete, JAGUAR ENERGY SERVICES, LLC person holding the original permit shall inform the client representative that work is going to stop and request an inspection of the area.
- (b) When the area and equipment are determined to be acceptable by the operator, both shall sign the original permit as Not Complete and show the time the permit is voided.
- (c) The original permit shall be fastened to the carbon copy and both shall be retained by the client.

24. Conditions Change

When conditions cause the work being performed to become unsafe, workmen shall stop work immediately and inform the client representative.

- (a) Work covered by the permit shall not start again until the hazards are corrected and verbal approval to return to work is given by the operator.
- (b) Any worker observing an unsafe work condition should stop work and inform the client representative.

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- (i) The client representative may void the permit if deemed necessary.
- (c) When a permit has been voided, a new permit must be issued prior to workmen returning to the jobsite.

25. Coordination Between Work Areas

The client representative where the request for the permit is made, are responsible for coordinating work on equipment extending outside the work area limits.

E. Training Requirements

- 1. Personnel will be trained on the following topics:
 - (a) Permitting procedures.
 - (b) Ignition sources.
 - (c) Fire prevention.
 - (d) Contents of this procedure.

F. Training Frequency

- 1. **JAGUAR ENERGY SERVICES, LLC** personnel will be trained according to the following schedule:
 - (a) Initially upon hire.
 - (b) If the employee is observed not properly implementing this procedure.
 - (c) If the procedure changes.
 - (d) As necessary thereafter.