



AzSPU Compliance Task Development Procedure

AZSPU-HSE-DOC-00114-2

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1. Introduction

The Azerbaijan Strategic Performance Unit (AzSPU) must ensure that it has an effective system in place to manage its compliance with applicable Legal and Regulatory Requirements. Legal and Regulatory Requirements (Requirements) derive from a variety of documents including national legislation, Production Sharing Agreements (PSA), Environmental & Social Impact Assessment (ESIAs) and other documents shared with regulatory agencies (collectively known as Source Documents). In order to effectively demonstrate and manage compliance with its Requirements, AzSPU has developed and implemented a database - known as the Compliance Task Manager (CTM) - to contain all of these Requirements and their associated Compliance Tasks. A Compliance Task is the specific action(s) needed to ensure compliance with the Requirement. **Figure 1** depicts the relationship between Source Documents, Requirements and Compliance Tasks.

This work instruction describes the process of identifying Requirements from Source Documents and developing Compliance Tasks from these Requirements. This process is the responsibility of the Task Developer (often a third party contractor) and is supervised by the AzSPU HSE Compliance Team (see Section 4).

Requirements and their associated Compliance Tasks are initially captured using an Excel Spreadsheet (the Task Template). This Task Template should be referred to while reading this procedure. **Figure 2** below depicts the Task Template and indicates the key actions - Steps 1 to 7 - needed to properly record Requirements and Compliance Tasks. Section 7 describes the Task Template in more detail.

Only the initial stage of Compliance Task development is included in this procedure. Subsequent stages of Task development up to the point where the Tasks are uploaded from the completed Task Template into the CTM database are described in a related procedure (Compliance Task Verification Procedure, AzSPU-HSE-DOC-00094-2).

All capitalized terms used in this procedure are defined in Section 2 of this document.

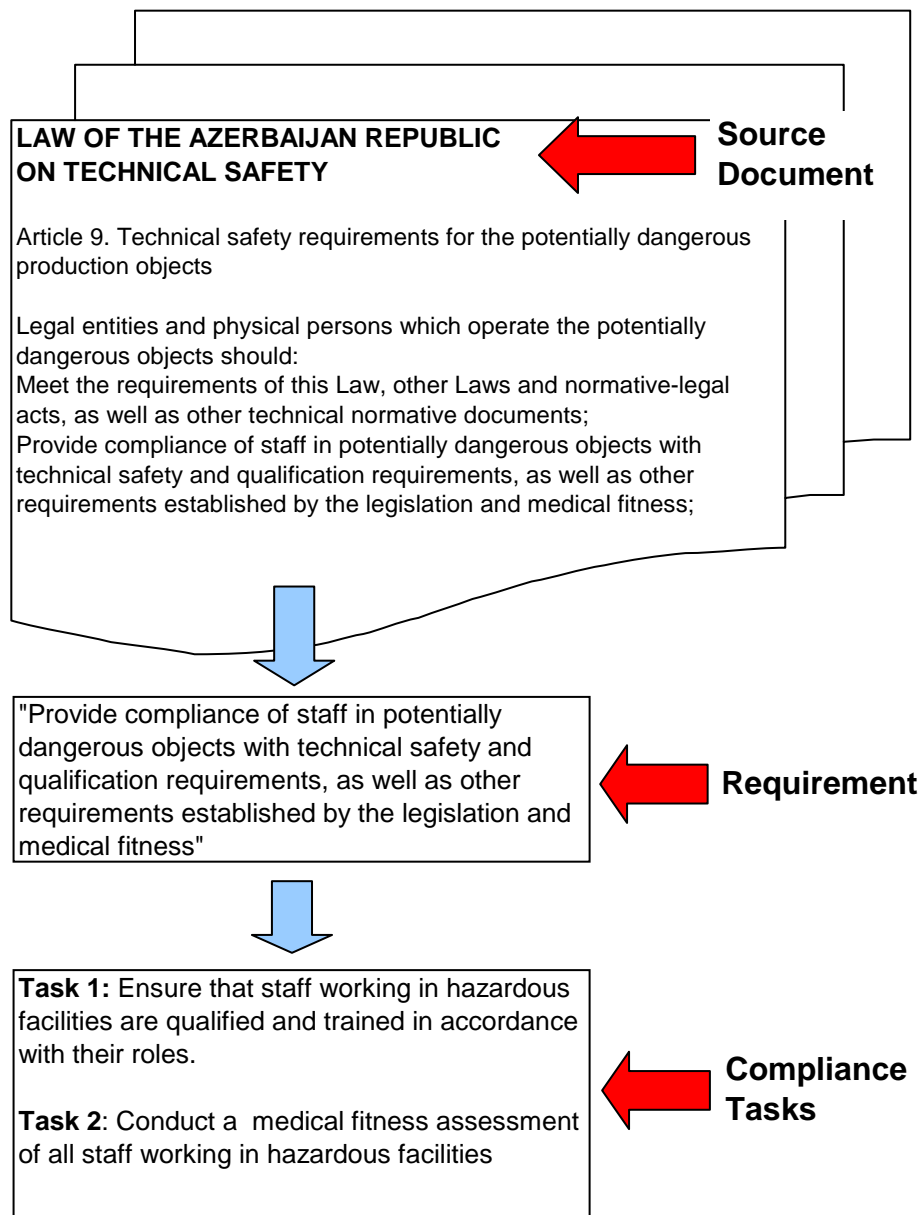
Figure 1 – Examples of Source Documents, Requirements and Compliance Tasks

Figure 2 - Completing the Task Template

	A	B	D	G	H	I	J	L
	Task ID	Colour Code Comments (Central)	Entity	High Level Requirement 1	Detailed Requirement 1	Requirement Citation Text 1	Task Title	Task Description
2	101	OK	VMF				diesel tanks	have been bundled
3	102	OK	VMF				Spill kits	Provide spill kits close to the fuel storage area.
4	103	OK (JE)	Serenja HWMF	ACG Phase 2 ESIA	Section 9.2.1	Diesel is stored within a secured area	Diesel stored in secured area	Store diesel in a secure area
5	104	CONSOLIDATE D WITH ID 105 AND 106 (JE)	Diesel Tank Farm	ACG Phase 1 ESIA	Chapter 3/39	Diesel will be stored in bundled areas	Diesel Storage	Store diesel and other fuel in an area bundled to ensure containment of potential spills.
6	105	TO CONS WITH (JE)		ACG Phase 1 ESIA	Chapter 5/69	Secondary containment used in fuel storage areas	Secondary Containment	
7	106	TO CONSOLIDATE WITH ID 104 (JE)	Diesel Farm	ACG Phase	Chapter 5/69	The diesel tank will be bundled to ensure containment of all potential spillage	Diesel Tank bunding	
8	110	OK (JE)	Warm Operations		apter 2/29	Fuel will be transferred from the vessel to the platform by means of fit-for-purpose hose with a quick release	Fuel transfer methods	Use a fit for purpose hose with a quick release coupling for fuel transfers offshore.
9	111	CONSOLIDATE D WITH ID 112 (JE)	Marine	ACG Phase 3 ESIA	Chapter 5/69	Fuel transfers [between vessel and platform] will be supervised at all times	Supervision of fuel	Supervise fuel transfers at all times and ensure that at least two people

2. Definitions

Compliance Task (Task): A clearly defined action that is developed from a Requirement. The Compliance Task is contained in the Task Description column in the Task Template.

Compliance Task Manager (CTM): An electronic compliance matrix (database) enabling businesses to manage the relationship between applicable legal and other requirements, compliance tasks, accountable BP employee positions, and operational controls.

Detailed Requirement: The Column in the Task Template where the specific reference for the Requirement is given, e.g. “Article 5.2.1”.

Driver: See Source Document.

High Level Requirement: The Column in the Task Template where the title of the Source Document is given, e.g. “ACG Phase 1 ESIA”.

Requirement/Requirement Citation Text: Actual language taken from the Source Document which the Compliance Task is developed from.

Source Document (Driver): Documents that are reviewed for the purposes of identifying requirements and developing tasks. These documents include, but are not necessarily limited to; PSAs, HGAs, ESIAs, technical notes and correspondence with the regulators.

Task: See Compliance Task.

Task Description: The column in the Task Template that contains the text of the Compliance Task.

Task Developer: The person responsible for identifying Requirements and developing Tasks from them.

Task Template: The excel spreadsheet to be used for recording Requirements and Compliance Tasks (the template to be used is AzSPU-HSE-DOC-00094-A2).

Task Title: The column in the Task Template containing a title summarizing the Compliance Task, limited to 100 characters.

Task Verifier: The person(s) responsible for verifying the Task Description provided by the Task Developer and providing additional information such as the position (job) title of the person responsible for completing the task.

3. Purpose

The purpose of this document is to provide guidance to Task Developers on:

- Reviewing documents and identifying legitimate Compliance Requirements.
- Developing a Compliance Task from a Requirement.

4. Roles & Responsibilities

4.1 Task Developer

The Task Developer will comply with the applicable requirements of this procedure and, under the direction of the AzSPU HSE Compliance Team Leader, or delegate, is responsible for:

- Conducting a thorough review of Source Documents to identify legitimate Compliance Requirements.
- Developing Compliance Tasks from Compliance Requirements using the required template.
- Providing documented information/justification for key decisions taken during the task identification/development process.
- Consulting with Technical Experts to ensure accurate identification and interpretation of Compliance Requirements and Tasks.

4.2 AzSPU Regulatory Compliance and Environment

AzSPU HSE Compliance Team Leader (or delegate)

The AzSPU HSE Compliance Team Leader, or delegate, will comply with the applicable requirements of this procedure and is responsible for ensuring that:

- Task Developers (SME) understand the requirements of this procedure and comply with them.
- Task Developers are provided with the correct Source Documents for review.
- Task Developers are provided with the Task Template, instructed in its proper use and provided with additional guidance as necessary.
- There is effective Quality Assurance of Task development.
- There is effective engagement with Technical Experts.
- Legal opinion is sought as appropriate prior to identifying applicable documents for Task Development.

5. Identifying and extracting Compliance Requirements

5.1 Introduction

The first stage of task development requires the Task Developer to review Source Documents to:

- (a) Identify Requirements; and,
- (b) Extract the Requirement and paste it into the Task Template.

Identifying legitimate Requirements is **the most critical element** in the entire task development process as it is the first step in what is often a time consuming process of developing, reviewing and verifying the Compliance Task. Several people are likely to be involved in this process and if this first step is not conducted correctly this will result in a considerable amount of resources being poorly allocated.

5.2 Identifying Requirements

Compliance Requirements are statements making a **definite commitment to do something**.

Table 1 below lists examples of legitimate Requirements and **Table 2** provides examples of statements that are not legitimate Requirements.

Table 1 – Examples of Legitimate Requirements

Legitimate Requirement	Interpretation
<i>“The legal and physical entities shipping hazardous goods have the following responsibilities.... b) to correctly attribute the hazardous goods to the class, sub-class, category and group in accordance with the International Code on International Maritime Dangerous Goods....”</i>	Use the IMDG hazard classification when shipping hazardous goods.
<i>“Employees and emergency crew of the port engaged in loading operations with fire hazardous goods shall be instructed on dangerous properties of such goods and fire safety regulations.”</i>	Instruct handlers of flammable goods and emergency response personnel in the hazards associated with dangerous goods and in the fire safety regulations that apply.
<i>“undertake requisite measures for decreasing the level of operational tension and tiredness of drivers”.</i>	Although it's not clear what is to be done, it is clear that something needs to be done to avoid tiredness in drivers, e.g. limiting driving hours.

Table 2 - Examples of Statements that are NOT Legitimate Requirements

Not a Legitimate Requirement	Interpretation
<i>“Water injection to the reservoir will initially be via one pre-drilled platform well and the six to eight subsea water injection wells”</i>	This is a description of a process, not a legitimate commitment for inclusion in CTM.
<i>“A number of contingency chemicals will be retained for use in the event that hazards are encountered during drilling. Table 5.7 provides a list of the chemicals that are typically used for contingency purposes”</i>	This provides an example of the chemicals that may be used it is not a definite commitment only to use specific chemicals.
<i>(c) Discharge [cooling water] to suitable water body</i>	When the context of this requirement was reviewed it was evident that it was referring to cooling water discharged from an offshore platform. Clearly there is only one water body to discharge to and this “requirement” is therefore meaningless.
<i>It is anticipated that more than 95% of the process and utilities on each platform will be commissioned onshore before the facilities are loaded-out for offshore installation.</i>	Anticipating that something will happen is not the same as committing to it.

When reading Source Documents such as ESIA's and Technical Notes, it is important to distinguish between text that simply describes a situation or process in order to provide context, and text which states requirements. The following abstract from an ESIA illustrates this point:

*“Following cementing, as for pre-drill wells, a number of clean up chemicals will be circulated to the wells. Estimated chemicals and usage is provided in table 5.8. **The preferred option for disposing of clean up fluids will be to recover and inject via the CRI well or, if this is unavailable, to ship to shore.**”*

Only the text highlighted in bold should be extracted and included in the Task Template as a requirement.

It is important that you seek advice if you are uncertain about the validity of Requirements that you are reviewing. In particular, you should bear in mind the following:

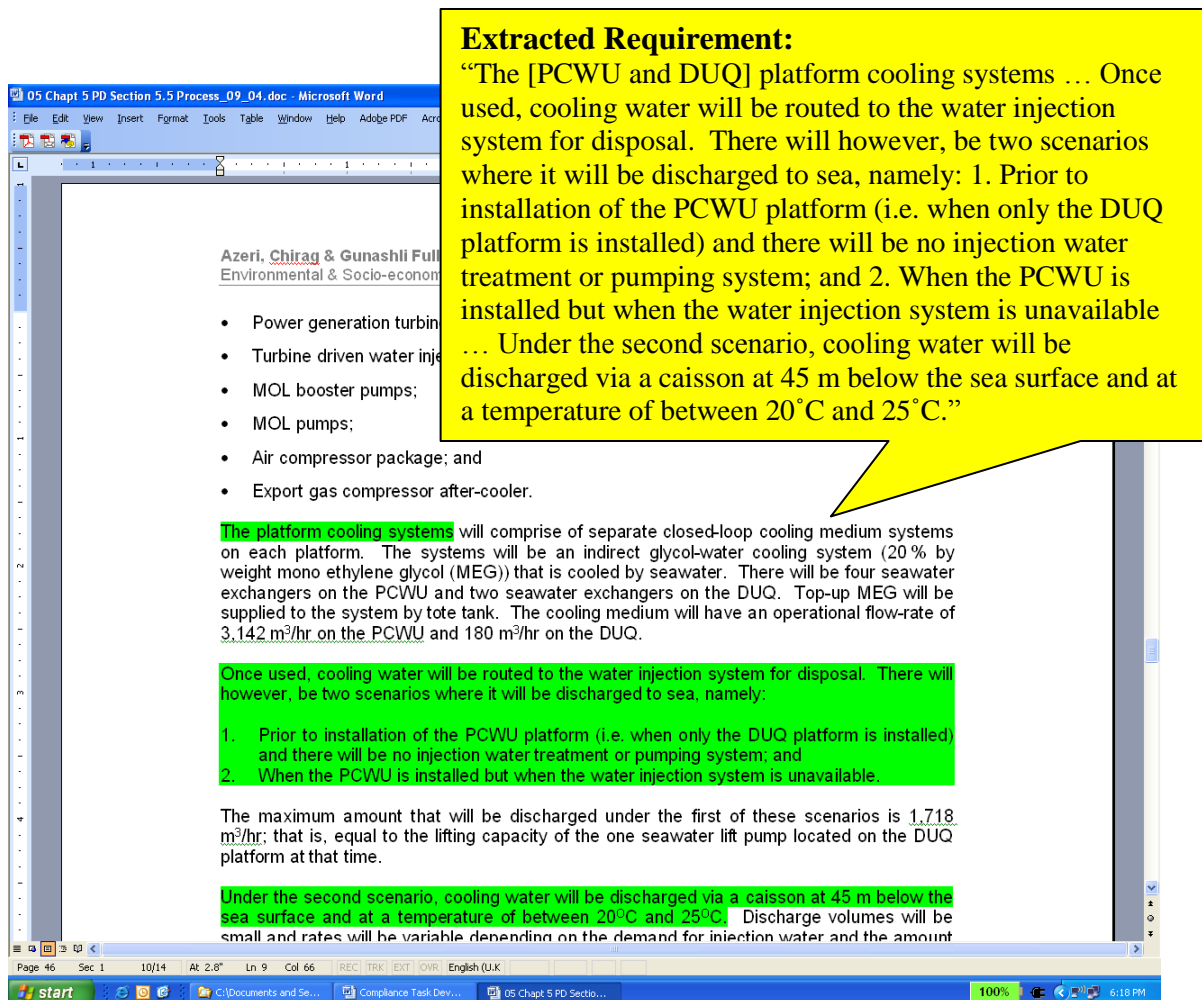
When reviewing technical documents for requirements it is important to obtain clarification from Technical Experts on any text that is unclear before identifying requirements.

If you are uncertain about the legal applicability of a document or any sections of the document, legal opinion should be sought via the AzSPU HSE Compliance Team Leader, or delegate, prior to identifying Requirements.

5.3 Providing sufficient context for the Requirement

Extracting text from a Source Document and copying it into the Task Template as a Requirement without considering the context is likely to result in subsequent misinterpretation. To avoid this, the Source Document must be carefully reviewed to ensure that the context of all Compliance Requirements is understood. To ensure that an extracted Requirement is understandable it is often necessary to take text from more than one place in the Source Document and combine it into a single Requirement and/or to provide additional explanatory text. **Figure 3** below provides an example; the text shaded in green in the Source Document has been extracted and combined to form the “Extracted Requirement”.

Note that an ellipsis (“...”) has been used to indicate missing text in the extracted Requirement and square brackets (“[]”) have been used to indicate text added by the Task Developer. You should add text to the Requirement to provide information on applicability and to explain acronyms or specific legal, technical or other terms.

Figure 3 – Example of Identifying and Extracting Requirement Citation Text

5.4 Dealing with ambiguous Requirements

Some requirements may be inherently ambiguous, for example, where a Requirement refers to standards or guidelines, e.g. “applicable PSA requirements”, but does not specify which requirements. Unless you are confident in your understanding of Operations and the relevant standards or guidelines you should not attempt to determine applicability.

5.5 Dealing with repeated Requirements

Many Source Documents include requirements that have been repeated. Where this is the case you may:

- (a) consolidate the references to the repeated Requirement in a single cell in the Task Template, or
- (b) exercise judgment and extract a single Requirement that addresses all duplicate requirements.

You should provide an explanatory comment in the Comments column of the Task Template (Column B in **Figure 2**), e.g. “This Requirement has been repeated throughout the document and is provided once in this spreadsheet”

5.6 Dealing with similar Requirements

Many Source Documents include several requirements that are similar and can be combined into a single Requirement, an example is provided below:

Figure 4 – Example of Consolidating Multiple Requirements

Multiple Requirements

ESIA Chapter 11/3. ... Each batch of barite supplied for use in WBM is tested by the supplier to confirm cadmium and mercury content...

ESIA Chapter 5/56. ...Batches of barite supplied for use in WBM formulations meet applicable heavy metals concentration standards.

ESIA Chapter 9/26 ...applicable heavy metals concentration standards are mercury<1 mg/kg and cadmium <3 mg/kg dry weight (total).



Consolidated Requirement

Each batch of barite supplied for use in WBM is tested by the supplier to confirm that they do not exceed the following concentration limits mercury<1 mg/kg and cadmium <3 mg/kg dry weight (total).

When working with a large Task Template with hundreds of rows containing requirements it may be difficult to identify similar requirements for consolidation. One way to consolidate requirements is to insert a temporary column in the Task Template and to include key words in this column for categorizing the requirements, e.g. “Fuel Storage”, “Fuel use” etc. (See **Figure 5**). If the “AutoFilter” function is applied to the

spreadsheet and the temporary column filtered alphabetically by key word, related requirements can be grouped together - see the shaded blue rows in Figure 5. Note that comments have been added in the designated column to indicate that the highlighted requirements are to be consolidated into a single Requirement.

Figure 5 - Using a Temporary Column to Group Similar Requirements

Task ID	Colour Code	Comments (Central)	Entity	Entity (New)	State	High Level Requirement 1	Temporary Category	Detailed Requirement 1	Requirement Comments
101			Serenja HV			ACG Phase 1 ESIA	Fuel Storage	Chapter 3/39	Diesel tanks will be stored in a secured area
102			Serenja HV			ACG Phase 1 ESIA	Fuel Storage	Chapter 5/69	Diesel tanks will be stored in a secured area
103			Serenja HWMF			ACG Phase 1 ESIA	Fuel Storage	Chapter 5/69	Diesel tanks will be stored in a secured area
104	TO BE CONSOLIDATED		Diesel Tank Farm			ACG Phase 1 ESIA	Fuel Storage	Chapter 3/39	Diesel will be stored in a secured area
105	TO CONSOLIDATE WITH ID 104		Diesel Tank Farm			ACG Phase 1 ESIA	Fuel Storage	Chapter 5/69	Secondary containment for fuels storage area
106	TO CONSOLIDATE WITH ID 104		Diesel Tank Farm			ACG Phase 1 ESIA	Fuel Storage	Chapter 5/69	The diesel tank will be stored in a secured area to ensure containment of potential spillage
110			Marine Operations			ACG Phase 3	Fuel Transfer	Chapter 2/29	Fuel will be transferred from the vessel to the platform by means of fit-for-purpose fuel transfer systems
111			Marine Operations			ACG Phase 3	Fuel Transfer	Chapter 5/69	Fuel transfers will be supervised at all times
112			Marine Operations			ACG Phase 3	Fuel Transfer	Chapter 5/69	At least two people will be involved in the fuel transfer process
107			Sangachal Terminal			ACG Phase 1 ESIA	Fuel use	Chapter 3/6	Monitor gas and consumption
			Sangachal Terminal			ACG Phase 1 ESIA	Fuel use	Chapter 3/6	Record the quantity of fuel used

5.7 Dealing with complex Requirements

In some cases the Source Document may reference a complex list or table that it is not practicable or sensible to incorporate into the Task Template.

If the table is a summary of requirements included elsewhere in the Source Document there is no need to attempt to incorporate it into the Task Template, however, an explanatory comment should be provided.

If the table includes multiple requirements these should be included as separate rows in the Task Template.

If the table is a single legitimate Requirement it should simply be referenced and a comment included in the comment column of the Task Template, e.g. “Requirement too lengthy to incorporate in Task Template, recommend including in a procedure”.

5.8 Dealing with conflicting Requirements

Some Source Documents may include conflicting or apparently conflicting requirements. These should be highlighted in the Comment Column for legal review.

6. Developing Tasks

6.1 Task Description

Compliance Tasks should be worded as simply as possible whilst still addressing the Requirement. One way to determine if a Compliance Task has been well written is to assess whether it is SMART, i.e.:

- **Specific** – Stand alone, clear and direct.
- **Measurable** – I can say it is done.
- **Actionable** – Starts with an action orientated verb (e.g. collect, record).
- **Reasonable** – Stick to tasks the site is already performing, whenever possible.
- **Timely** – Set the right frequency, don’t overdo it.

An example of a badly worded task that does not pass the SMART test:

“Comply with environmental standards and practices generally observed by the international community with respect to comparable petroleum pipeline projects, including standards and practices that specifically relate to ecological management and monitoring in the IUCN Guidelines for the Prevention of Biodiversity Loss Caused by Alien Invasive Species (2000); the IFC OP 4.04, Natural Habitats, November 1998; and IFC OP 4.01 Environmental Assessment (1998), and specifically Guidance Note C: Outline of an Environmental Action Plan.”

The above “Task” is still in the form of a Requirement and will require further work in order to develop a meaningful task. A possible SMART version of this “Task” could be:

“Conduct an annual environmental audit of Exports using a checklist including applicable requirements from IUCN and IFC Guidelines”

Note that the Task Developer has made the assumption that the task can be written as an audit task. Where assumptions are made in developing the Compliance Task these should be stated in the comments column.

It is important to realize that as the Task Developer you are not responsible for finalizing the Task but **you must ensure as a minimum that the Requirement is accurately stated and is understandable** to someone who is not familiar with the Source Document. All Tasks will be finalized by the AzSPU HSE Compliance Team in consultation with the individuals responsible for implementing them, and may be reworded.

6.2 Other Task Information

Once you have completed the Task Description, several other columns in the Task Template should be completed including:

Task Title

Add a Task Title. This should be an appropriate summary of the Task Description, not more than 100 characters in length.

Entity

Include the Entity, i.e. the site or facility (e.g. Sangachal Terminal) where the Requirement applies. Unless you are certain which Entity the Requirement applies to leave this column blank.

Assign Task Group

Select the most appropriate value from the drop down list in the “Task Group-Other” column.

Complete Due Date & Frequency

If the Task you are developing has a specific due date or frequency **stated in the Source Document** you will need to complete the Due Date column in the Task Template. Dates must be entered in US Date Format i.e. MM/DD/YYYY. Once you have entered the Due Date, if the task is repeated, you will need to select an appropriate value from the adjacent “Frequency” column. Values in the “Frequency” column are included in a drop down list.

If you need help in completing any column in the Task Template simply select the relevant column to see a “pop up” guidance note¹ - see **Figure 6** below.

¹ The first cell in the relevant column can also be selected to view the “Pop-up”.

Figure 6 - Pop-Up Guidance Note

	G	H	I
1	DO NOT AMEND	DO NOT AMEND	DO NOT AMEND
2	High Level Requirement 1	Detailed Requirement 1	Requirement Citation Text 1
3	ACG Phase 2 ESIA	Section 5.2.3	Diesel tanks will be bunded
4	ACG Phase 2 ESIA	Section 5.1.3	Spill kits will be located close to the fuel storage area
5	ACG Phase 2 ESIA	Section 9.2.1	Diesel is stored within a secured area
	ACG Phase 1 ESIA	Chapter 3/39	Diesel will be stored in bunded areas

Please note that the “DO NOT AMEND” warning shown in the top row in Figure 6 is provided for Task Verifiers only and does NOT apply to you as a Task Developer.

7. Guidance on completing the Task Template

Although there are several worksheets in the Task Template there are only three that you need to be concerned with as a Task Developer, these are:

- User Guidance
- Tasks
- Drivers

A brief description of each follows:

User Guidance: This worksheet provides brief guidance on completing the Task Template.

Tasks: This is the main worksheet where you need to include the Requirements and associated Compliance Tasks - See **Figure 2**.

A full list of the columns in the Tasks worksheet is provided in **Appendix 1**. It is important to recognize that most of these columns are not relevant to initial task development and will therefore not concern you. Most of these columns will be completed as part of the subsequent task verification process and should be ignored.

If you are unsure about the columns and guidance that apply to you as a Task Developer please seek clarification from the AzSPU HSE Compliance Team Leader.

Drivers: This is where you need to record details of the Source Documents reviewed - See **Figure 7** below.

Please **do not amend the other worksheets contained in the Task Template** unless directed specifically to do so.

Figure 7 - List of Source Documents Reviewed

	A	B	C	D	E
	Category	Title	Date	Sections reviewed	Comment
1	National	The Cabinet of ministers of the Azerbaijan Republic Resolution No. 10 On Approval of the Rules for Reporting on Aviation Accidents and Incidents	9/19/2008	All	Determines the requirements and procedures for reporting aviation accidents and incidents to the State Civil Aviation Administration. Applicable to BP operations.
2	National	Regulations on the Issue of Driving Licenses	8/17/1998	All	
3	National	The Law of the Azerbaijan Republic on Transport.	6/11/1999	All	Sets out the framework for the development of transport and transportation.
4	National	Decree on Approving Statutory Acts on Issues of Safety of Navigation	5/8/2000	All	
5	National	Cabinet of Ministers of the Azerbaijan Republic Resolution No. 41 On approval of Regulations on Training Course for Vehicle Drivers and Improvement of their Qualification, Rules of Self-training on Practical and Theoretical Aspects of Driving to Obtain Driving Licenses and Regulations on Examination of Persons Desiring to Receive Driving License, Rules of Issue of Driving Licenses.	3/15/1999	All	Sets out the rules and Regulations regarding Azerbaijan Nationals for training and examination to obtain a state driving license.
6	National	Law of the Azerbaijan Republic on Road Traffic.	7/3/1998	All	Determines the legal foundation for implementation of the overall scope of measures for arranging safe and comfortable movement of transportation and pedestrians on roads, protection of life and health of individuals in relation to traffic, protection of environment and of private, municipal and state property, prevention of road accidents and decreasing the level of severity thereof, and determination of rights and duties of traffic participants. Small section of the Regulations pertaining to entities applies to BP.
7	National	Resolution on Safety of Roads No. 60 1999	4/6/1999	All	
8	National	The Cabinet Ministers of Azerbaijan Republic Resolution No. 10 On Approval of the Rules for Reporting on Aviation Accidents and Incidents	9/19/2008	All	Sets out the duties and requirements of the Commission of the State Civil Aviation Administration.

Appendix 1- Column Headings in Task Template

COLUMN HEADING	WARNING	REQUIREMENTS FOR DATA ENTRY
ID	DO NOT AMEND	
Colour Code Comments (Central)	DO NOT AMEND	
Comments (PU/Asset)		Provide comments as required, e.g. "THIS REQUIREMENT IS NOT APPLICABLE AS THE OFFSHORE PU DOES NOT CONDUCT AMBIENT AIR MONITORING."
Entity	DO NOT AMEND	
Entity (New)		If the assigned entity is wrong insert the correct entity here.
State	REQUIRED	The current state of the Compliance Task i.e. whether the Task is 'Open' (to be completed and/or recurring) or 'Closed' (completed and non-recurring)
High Level Requirement 1	DO NOT AMEND	
Detailed Requirement 1	DO NOT AMEND	
Requirement Citation Text 1	DO NOT AMEND	
Task Title	DO NOT AMEND	
Task Title (New)		Maximum length of 100 characters
Task Description	DO NOT AMEND	
Task Description (New)		If the task needs rewording the new text must be included here
Due Date	REQUIRED (ONLY FOR RECURRING TASK)	Enter the date only in US Date format - MM/DD/YYYY
Frequency	REQUIRED (UNLESS A CONTINUOUS TASK)	Select a value from the drop down list
Owner	REQUIRED	Full name(s) as included in the Position Title List spreadsheet
Team	REQUIRED	Position Title as included in the Position Title List
Supervisor	REQUIRED	Full name as included in the Position Title List Spreadsheet
Supervisor Team	REQUIRED	Position Title as included in the Position Title List
Operational Control Description 1	REQUIRED	Name of control, e.g. document ID of the procedure
Operational Control Location 1	REQUIRED	Location of the procedure, e.g. "HSSE MS Documentum"
Task Group - BP/Contractor Performed	REQUIRED	Select a value from the drop down list
Task Group Other 1	REQUIRED	Select a value from the drop down list
Operational Control Description 2	AVOID USING IF POSSIBLE	Include only if necessary - it is recommended to avoid multiple controls where possible
Operational Control Location 2		
Operational Control Description 3		
Operational Control Location 3		
Evidence Document Description 1		Include only if required. Evidence of completion, e.g. "Site Inspection Checklist August 2009"
Evidence Document Location 1		Include only if required. Location of completion evidence, e.g. "HSSE_MS_Shared_Drive\Monitoring Reports"
Evidence Document Description 2	AVOID USING IF POSSIBLE	
Evidence Document Location 2		
Evidence Document Description 3		
Evidence Document Location 3		
High Level Requirement 2	DO NOT AMEND	
Detailed Requirement 2		
Requirement Citation Text 2		
High Level Requirement 3		
Detailed Requirement 3		
Requirement Citation Text 3		
High Level Requirement 4		
Detailed Requirement 4		
Requirement Citation Text 4		
High Level Requirement 5		
Detailed Requirement 5		
Requirement Citation Text 5		

Revision/Review Log

Revision Date	Authority	Custodian	Revision Details
August 19, 2009	AzSPU Safety & Compliance Manager (Yuliy Zaytsev)	AzSPU HSE Compliance Team Leader (Anar Naghiyev)	Initial Issue
August 19, 2010	AzSPU Regulatory Compliance and Environment Manager – Faig Askerov	AzSPU HSE Compliance Team Leader (Anar Naghiyev)	Title changed in 4.2