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Issue Summary

Issue Number	Date	Description of Revision or Amendment
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1	01.07.2014	Revised
2	06.05.2015	Rebranded
3	07.10.2015	Re-numbered, revised and moved to Quality Docs
4	23.05.2016	Template & renumbering update
5	19.01.2022	Template & renumbering
6	11.03.2022	Full Revision
7	22.08.2022	New service offerings for MOC requirements
8	08.05.2024	Update to change level definitions, addition of Human factors and update to reflect new MoC Register
9	03.06.2024	Minor update to wording in Section 6.4.2
10	04.12.2025	Updated for IS-related references
11	12.01.2026	Updated for ICT changes

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1 INTRODUCTION

Both business and operational issues may lead to the requirement for changes to be made to business practices or programmed plans and procedures. Changes can lead to new or additional risks being introduced, creating business risk, or placing personnel or equipment in harm's way. A systematic management of change system will ensure that variations are fully discussed, analysed, and assessed for risk prior to implementation.

2 PURPOSE

The purpose of this procedure is to detail the methods by which changes may be affected and controlled.

The procedure aims to ensure that business change, temporary or permanent organisational, systemic, or operational changes are considered for HSE & Information Security (IS) implications, impact on processes, risk mitigation or acceptance prior to implementation and to ensure people affected by the change are aware of and understand the change itself, their role, and responsibilities in the change.

3 SCOPE

The procedure is valid for general business management and for operations involving Exceed-managed projects, facilities, equipment processes and personnel in which Exceed has responsibility for preparing and executing the programme of work. A Management of Change (MoC) Request Template (**EXCEED-FT-QA-013**) is used to effect change in Exceed, Client or Contractor policies & procedures. MoC numbers shall be requested via the MoC Register located on the QHSSE Intranet site.

All such changes are to be assessed and documented for their health, safety, security, environmental, financial, and reputational implications.

4 RESPONSIBILITY

4.1 General

- Personnel**
 All personnel who work on Exceed Managed projects are familiar and comply with the requirements of this Procedure and, for operations and projects, the relevant programmes and work instructions.
- Change Initiator**
 Completes documentation required of this procedure regarding suggested changes which will increase or introduce new HSE, IS or business risks. (MoC Form, commensurate Risk Assessment and where necessary a Programme Amendment.) Requests MoC number and adds MoC to register.

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- **HSE Advisor**
Provides guidance or information to the Responsible Manager(s) in implementing aspects of the Management of Change process and ensure Management of Change Process is audited periodically.

4.2 Operations / Projects

- **Exceed Wells Project Manager/Project Engineer:**
 - Responsible for the implementation of this process for use within projects / operations.
 - Authorises the change process.
 - Completes review of Management of Change information contained on the request form.
 - File documentation associated with Change Management Process in the appropriate location.
- **Wellsite Leader:**
 - Implement the requirements of this key process.
 - Completes on-site HSE Risk Assessment and determine if controls are adequate for risks associated with the Change.
 - Complete technical review of changes proposed.
- **Client Representative:**
 - Ensure adequate resources are allocated for the implementation and continuous maintenance of this key process in their area of responsibility.
 - Review and/or approves changes to programmes as detailed in the project specific MSID.

5 POLICY/PROCEDURE DEVIATION

Exceed Policy/Procedure may only be changed or deviated from with the approval of the relevant Head of Division or delegate, for example, Head of Well Management or UK Wells Manager. If a client's policy/procedure is to be changed or deviated from, the Client Representative must be a signatory to the MoC form. (The only exception is when a specific policy/procedure states an alternate means of dispensation). All policy/procedure deviations require an MoC form to be completed.

Dispensation should be sought by documenting the reasons why the dispensation is required and what implications deviation from the procedure may have to operations.

For example, a dispensation may be requested for a single well or a number of wells in the same field. It must not be assumed to apply to other situations unless a similar specific dispensation has been sought and approved.

The format for procedure dispensation must therefore include the following items:

- Which procedure is to be deviated from?

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- The reason for the request
- The proposed departure from procedure
- The additional risks which may be incurred
- The actions to be taken to minimise those risks
- The duration of the dispensation
- Does the dispensation require consultation with the Well Examiner or relevant authorities?
- The dispensation must be signed by the following:
 - Originator
 - Reviewer
 - Approver
 - Client Approver (if Client policy is to be deviated from)

An appropriate risk assessment must be carried out prior to granting policy relaxation or change from approved procedure. This should be carried out in accordance with the Exceed Risk Assessment Procedure (EXCEED-PRO-HSE-004) and attached as supporting documentation if required.

A signed copy of the MoC form must be attached to the record in the MoC Register on the QHSSE Intranet, retained in the relevant project file and communicated to the relevant personnel. In the case of a minor change for well operations, an email is sufficient but should be attached uploaded the MoC record in the system.

6 MOC PROCESS

6.1 Initiating The MOC Process

The Management of Change process focuses on identifying hazards, assessing risks, and implementing controls for changes. Items that shall initiate this process include:

- Business and Organisational- Changes – The senior management team shall ensure all proposed business changes are assessed in line with this procedure. This type of change includes:
 - Changing Board of Directors
 - Acquisition/merger of companies
 - Office / premises locations
 - New Countries of Operations
 - Addition of service offerings
 - Downsizing
 - Delaying and Multiskilling
 - Outsourcing
 - Changes to Information Security systems
- Personnel and Role Changes - that may require change management include:
 - New personnel (especially key and Safety/Environmental Critical Positions).
 - Personnel transfers.
 - Temporary transfers or assignments; and

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- Promotions
 - Job Enlargement (changed or additional duties)
 - Task Enlargement (additional workload or effort)
 - Succession Planning
- QHSE & IS Management Systems - the Responsible Manager shall ensure that all proposed Management System changes are properly reviewed prior to approval. This type of change includes:
 - Changes to operational or technical documentation.
 - New plant, materials or equipment are introduced; and
 - Changes to contracting companies i.e., change of ownership, major internal organisational change.
 - New or revised legislation
 - Advice should be considered from the QHSE and/or the ICT Departments during the assessment of this area of change.
 - Engineering, Well Design processes and Well Operations - change that will initiate the Management of Change process for engineering, well design and Well Operations processes typically include:
 - Reservoir or geological/geophysical changes.
 - Well design/construction changes.
 - Well testing / Completion design, well prognosis, geological design, etc.-
 - New technology or systems are introduced,
 - Any change to approved operational programmes,
 - Changes to final well status.

6.2 Exclusions from the MOC process

Management of Change is not required for:

- Normal maintenance or scheduled reviews.
- Repair of equipment (corrective maintenance)
- Replacement of components/equipment with same functional specification and no update of drawing required; or
- Change of operational parameters in software system.
- General unapproved or uncontrolled management documents, drawings, and designs

Note: The Document control and management processes shall still apply to all changes to controlled or uncontrolled and approved documents.

6.3 Change Request Forms

Personnel managing activities which constitute a change as per the definitions in this procedure are required to initially generate an MoC number using the online form on the QHSSE Intranet and then complete a Management of Change Request Form (**EXCEED-FT-QA-013**). This form requires basic details of the change requested and can include additional information such as designs, sketches, costs etc. The form requires an explanation for the requested change and also requires the Initiator to determine if there are alternatives to the suggested change.

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In addition, the form requires the initiator to consider the technical, information security and human factor hazards, risks and benefits of the suggested change as well as any potential impacts that may be created to other systems or processes as a result of the suggested change.

This form is then passed on to the Responsible Manager for review and processing.

In the case of a minor change for well operations, an email is sufficient but should retrospectively be added to the MoC register and then attached to the record in the system to ensure a full auditable trail.

6.4 Change Process - General Changes (Non-operational)

For all changes, the change initiator should complete **Section 1** in the Management of Change Request Form (EXCEED-FT-QA-013), to initiate the process. The Change Initiator will then submit the form to the Responsible Manager/Managers who will complete **Section 2** and either reject the change and returns the Form to the Change Initiator or approves the change and submits the Form to the relevant Authoriser.

The Authoriser will complete, and sign **Section 3** authorising the change and returns the Form to the Change Initiator filing and storage.

Throughout the process, the effect of the implemented change should be monitored to ensure further hazards have not been introduced as a result of the change.

The change initiator and the Responsible Manager(s) should ensure that learnings from the process are captured in the lessons learned database, as appropriate.

6.5 ICT Changes

Any deviations from policy or procedure will follow the general changes process as above.

Minor changes include system customisations, configuration etc and will be logged and managed via a standard ICT support ticket (support@xcd.com).

Major changes affecting multiple users or business functions should be coordinated in conjunction with the head(s) of function ensuring appropriate plans in place for testing and communication to affected users. These changes don't require a formal MOC but must be documented via the ICT support desk and if deemed necessary an internal project set up to manage the change at the discretion of the Head of ICT.

6.6 Operational Programmes and Work Instructions

For all changes, other than minor Operational Programme changes where an email is sufficient, the MOC shall be completed as described in section 6.4.

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All well operations are carried out in accordance with the approved Programme, associated Work Instructions. and any subsequent Programme Amendments

These procedures should also apply to deviations from Drilling/Well Testing/Completion/Decommissioning / Intervention / Workover Programmes, with the relevant Exceed Engineer assuming the responsibilities of the Project Engineer.

Deviations from the programme may become necessary due to uncertainties in the subsurface environment or opportunities / issues encountered during the course of operations.

A Project MOC Decision Matrix (**EXCEED-FT-WM-WEP-023**) will be prepared for each project and included within or referred to in the CMP and MSID, with change control procedures recognising the following levels of deviation from the approved programme or work instructions.

6.6.1 Minor Changes

A Minor Change to the operations programme will be discussed and agreed at the Morning Operations Meeting or equivalent. Programme changes will be confirmed by e-mail from the Wells Project Manager, or designate, to the Senior Wellsite Leader.

- A “minor change” is a change to an approved work programme (or a procedure referenced in it) that has no safety implication and has no impact on the operation’s objectives. Examples include but are not limited to
 - **Drilling:** an additional wiper trip.
 - **Well Test:** Additional sampling requirements
 - **Completions:** Additional Wellbore clean up run
 - **Well Integrity:** Additional routine maintenance on plant or equipment not impacting the barrier elements of the well.
 - **Decommissioning:** Additional casing cleanout run prior to logging

Minor changes for well operations do not require a formal MoC form to be completed.

However minor, non-operational business changes may require a form to be completed.

In all instances, an MoC record must be created in the register and the relevant email, form or supporting documentation must be attached uploaded the MoC record in the system.

6.6.2 Major Changes

A change that changes the fundamental methodology of a planned operation and/or increases expected well time or cost by 3-10%. This could be in the form of, for example, additional steps added to the work scope to overcome a problem or change of sequencing of the planned operations. Any such change requires a programme amendment to be issued, supported by an MoC form with accompanying risk assessment (as per the RA procedure). Such changes shall be notified to the Well Examiner and the Programme Amendment, MOC Form and RA provided. (This is because the Well Examiner has examined a Programme of work, and therefore if the programme changes, they should be aware of those changes).

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The Wells Project Manager shall discuss the proposed change with the Client Representative and if required, Exceed UK Wells Manager and/or Head of Wells. Programme Amendments are approved by the Wells Project Manager and Project Engineer, or their delegates, and form part of the Drilling / Well Test / Completion / Decom Programme on issue.

- A “Major Change” is defined as a change to an approved work programme that does not impact the operation’s objectives but could have a direct safety implication and/or major cost implication. Examples include, but are not limited to:
 - **Drilling:** Casing shoe leak-off test or formation integrity test below expected value or the failure of and/or replacement of a wellbore barrier to flow.
 - **Well Test:** Well barrier element failure i.e. Well Test packer fails pressure test. Test string requires recovery and re-run
 - **Completions:** Changes to completion architecture out with the agreed programme i.e. electing not to run a gauge.
 - **Well Integrity:** Any failure impacting on a safety function resulting in the spurious operation of the safety element putting the well the under protection, into a safe state or maintain a safe state
 - **Decommissioning:** Failure of a planned barrier

For all matters of Health & Safety, the Well Examiner and the Regulatory Authority (OMAR / HSE, UKCS only) shall be directly involved in major changes, in order to examine and inspect respectively.

Changes affecting the Final Well Status are automatically a **Material Change** and must be treated as such see Section 6.4.5.

6.6.3 Material Change

A Material Change is one which changes the final well status, and/or the well envelope (pressure tests, materials used, casing setting depths, etc). A Material Change shall be presented to the Well Examiner for examination and subsequently issued to OMAR (HSE/OPRED) for consent (UKCS only). A Material Change is not triggered by cost or time, but by safety and environmental considerations associated with well construction and life cycle operations. The MoC should though include all consequences of the Change as should the associated Risk Assessment.

The Wells Project Manager shall discuss the proposed change with the Client Representative, Drilling Contractor Representative, Exceed UK Wells Manager and/or Head of Wells, Well Examiner, OMAR (HSE/OPRED) and other relevant regulators as required.

This, in addition to Wells Project Manager and relevant Project Engineer approval, shall be approved by the Well Examiner, Customer Representative and the Drilling Contractor’s Representative, or their delegates. The change can only be enacted once OMAR consent/non objection has been received, where appropriate.

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Confirmation of approval of a change from any of the above specified signatories is acceptable by electronic mail from the signatory's account. In the event of electronic mail approval from the Customer Representative, the MoC should be marked "Written Approval Received" against the Customer Representative's name and initialled by the Project Engineer or Wells Project Manager, or their delegates. This approval shall be saved alongside the other documentation related to the MoC in the system.

- A change affecting the final well status is defined as a material deviation from plan which results in the objectives or the design of the well changing. Examples include, but are not limited to:
 - **Drilling:** Deletion of a planned casing point, change in pore pressure affecting planned well design, deepening of well beyond planned TVD or original PBTD, revised casing setting point within the reservoir resulting in loss of reservoir section or plug back of existing wellbore and subsequent sidetrack.
 - **Well Test:** Flow of hydrocarbons into the annulus during the well test flow periods or events that would require the well to be killed prematurely.
 - **Completions:** Any action i.e., hydrates, that would prevent a safety element from operating when required (demand mode) or causes a safety function to fail such that the well under protection is put into a hazardous or potentially hazardous state
 - **Well Integrity:** Any event or action that reduces the probability that a safety function operates correctly when required.
 - **Decommissioning:** Unable to access a planned plug setting interval due to a restriction in the wellbore

6.6.4 Out of Hours Process

For non material change, out of hours, or when it is otherwise not reasonably practicable to raise a written Programme Amendment and/or MoC form, an email detailing the required programme changes will be issued by the Wells Project Manager / Drilling Superintendent. Changes affecting safety must as a minimum be discussed and agreed with the OIM. Formal submission of the MoC and any associated programme amendment must then be done as soon possible during office hours.

In the event of a major unplanned event which may impact the security of the personnel and installation the Senior Wellsite Leader in consultation with the OIM will secure the well as a priority and immediately contact the Wells Project Manager.

Whenever an MoC is raised, it must include an appropriate risk assessment.

6.6.5 Operations Management of Change Summary

Category of Change	Criteria	Communication Method	Approval Required
Minor Change	- no safety or environmental implications, and - no impact on other facilities, and - no impact on well objectives, and - less than 3% impact on the overall well cost	Email	Confirmed by Project Manager / Superintendent or designated weekend duty personnel.
Major Change	- does not impact the well's objectives, but - could have safety or environmental implications, and/or - increases the cost of the well operation by 3-10%	Approved MOC form and if deemed necessary, a Programme Amendment-	- Senior Engineer, and - Wells Project Manager / Superintendent
Material Change	- will impact the well's objectives, and / or - safety and/or environmental implications - increases the residual risk from any of the Categories, and / or - increases the cost of the well operation by more than 10%, and/or	Approved MOC form and if deemed necessary, a Programme Amendment.	- Senior Engineer, - Wells Project Manager / Superintendent and, - UK Wells Manager and/or Head of Wells - Well Examiner - Drilling Contractor Representative - Client Representative (unless Exceed acting as Well Operator) - OMAR Consent (UKCS only)

6.7 Communicating the MOC Process

Throughout the change process, details of the progress will be communicated to the Change Initiator, employees, and contractors in accordance with Exceed Communication Procedure.

For operations, communication of the change progress will occur no less than daily and will be considered when approving any daily work instructions or Permits to Work (PTW).

The Responsible Manager will ensure that any new documentation or training required is identified, developed, and communicated to all relevant employees and contractors.

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6.8 Continuous Improvement

To ensure continuous improvement occurs, a review date for further follow-up of the implemented change will be set by the Responsible Manager in consultation with the HSE Advisor / QHSSE Manager to ensure further hazards have not been introduced as a result of the change.

6.9 Documentation

Upon completion of all documentation associated with the change, it will be collected and filed by the relevant Responsible Manager. Relevant information regarding document control shall be adhered to as per Exceed Document Control and Management of Records Procedure (EXCEED-PRO-QA-001).

The Responsible Manager will ensure that any new documentation required is identified, developed, and communicated to relevant employees.

A signed copy of the MoC form and/or email must be attached to the record in the MoC Register on the QHSSE Intranet along with any relevant supporting documentation (Programme Amendment, Risk Assessment etc).

6.10 Monitoring

A system shall be established for tracking the status of all MOC forms for the full life cycle of each change. The Responsible Manager will continuously monitor the MOC documentation and the relevant action lists to ensure continuity between the documents.

7 REFERENCES

EXCEED-PRO-QA-001	Document Control & Management of Records
EXCEED-PRO-HSE-004	Risk Assessment Procedure
EXCEED-FT-QA-013	Management of Change Request Template
EXCEED-FT-WM-WEP-023	Project MOC Decision Matrix



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Final Audit Report

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