

**Consultation on High Level Design of Petroleum Safety Framework  
Respondent Meeting  
Shell E&P Ireland Limited (SEPIL)  
Tuesday, October 11<sup>th</sup> 2011**

**Location:** CER Offices

**Time:** 14.00

<b>Attended by:</b> Gerry Costello	SEPIL
John Conroy	SEPIL
Andrea Ahern	SEPIL
Chris Monks	SEPIL
Paul McGowan	CER
Eamonn Murtagh	CER
Róisín Cullinan	CER
Kieran Walsh	CER
Theresa Reddy	CER Consultant, GL Noble Denton

**Minutes:**

*1. Introduction*

- The meeting was opened by CER and all attendees were introduced.
- SEPIL representatives were informed of the process by which the Consultation Response Paper and Draft Decision Paper would be published. Consultation Responses and minutes of Consultation Response Meetings will be published in early November. Consultation Response Paper and Draft Decision Paper expected to be published before Christmas 2011.

*2. Discussion on SEPIL Response to Consultation Paper:*

A number of key specific points relating to the letter accompanying the SEPIL submission were discussed, including:

- a) ALARP  
SEPIL requested that qualitative risk assessments be highlighted as a method of risk analysis.
- b) Permissioning and Designated Petroleum Activities  
SEPIL noted that a consultation phase prior to submission of a Well Design Safety Case would be more appropriate than a Provisional Well Design Safety Case. SEPIL noted that the information available at this early design stage would not be adequate for the CER to form a formal assessment of end design. SEPIL request that the Provisional Well Design Safety Case is not required under the CER permissioning regime.

Similarly, SEPIL note that consultation and dialogue with the CER would be more appropriate during the concept selection phase of the development than the submission of a Concept Safety Case. SEPIL noted that the information available at concept design stage would not be adequate for the CER to form a formal assessment of design. This would be more appropriate at the detailed design stage and the submission of the Design Safety Case. SEPIL request that the Concept Safety Case is not required under the CER permissioning regime. If accepted, it would mean that the Design Safety Case would be submitted to obtain a Pre-Construction Safety Case.

c) Agreed Regulatory Interfaces and Co-operation

The CER noted that the method of transition from the current regime to the Petroleum Safety Framework (PSF) cannot be outlined at this point, until the high level design of the PSF has been determined

d) Compliance Assurance

Discussion was had relating to inspection and verification, on the assessment of submissions put forward by the petroleum undertakings for normal drilling activities. It was noted that the turnaround time in the industry can require the immediate availability of resources (independent or CER) and that the appointed body must have the required capabilities.

SEPIL noted that, with respect to the current Corrib Verification Scheme which is a requirement of the Corrib Plan of Development approval, that there is a potential for duplication with the Verification Scheme proposed by the CER in its consultation paper.

A number of points within the questionnaire were raised for discussion by as follows:

- SEPIL clarified its response to Question 50 – it requests that the CER provide guidelines for the independent verifiers to develop their verification system around, to ensure the system adopted meets the requirements of the CER.
- Question 49 – SEPIL stated that given that ALARP is inherently included in the Safety Case, SEPIL suggested that ALARP is not required to be explicitly included in the verification scheme guidance.

Corrib Development

A brief overview of the Corrib Development was provided by SEPIL. SEPIL anticipated it will be ready for production in 2014.