



Irish Offshore
Operators'
Association

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Suite No. 2119, Fitzwilliam Business Centre, 26, Upper Pembroke Street, Dublin 2, Ireland
Tel: 01 497 5716 Email: iooa@tramway.ie Website: www.iooa.ie

Ms Alice Hanly,
Technical Analyst – Petroleum Safety Framework,
Commission for Energy Regulation,
The Exchange, Belgard Square North,
Tallaght,
Dublin 24.

21st December, 2012

Dear Alice,

The Irish Offshore Operators' Association (IOOA) welcomes the Guidance Document for Safety Case Guidelines (ref. CER 12/182) issued on 6th November 2012 and has a number of issues which it wishes to comment on:

1. Well Notifications:

The concept of a Well Notification as detailed in Section 5 of the Guidelines is at variance with International best practice and its stated intent “to provide the CER with an early opportunity to assess whether the well work being proposed is in accordance with the Framework” is considered entirely unnecessary. The Guidelines state that prior to a Well Work Safety Permit being granted, a Well Safety Case must first be approved. IOOA sees no merit in adding another additional step to the Well Safety Case approval process and considers it an extra administrative burden with no additional value being provided. There is no similar stage in the Design, Production and Decommissioning Safety Cases and it is recommended that this step be removed from the Guidelines in order to create a streamlined process across all safety cases under the Petroleum Safety Framework.

2. Timeline & Approvals:

A clear timeline should be provided for submission of the Well Safety Case in order to facilitate well planning and resource allocation by the Petroleum Undertaking. In addition, there should be a clear and unambiguous understanding of the role of the CERs implementation of the safety case regime in relation to existing offshore well notification procedures as currently carried out by the DCENR. It is critical that unnecessary duplication is avoided in this area. IOOA therefore recommends that the implementation of the Safety Case Guidelines under the Petroleum Safety Framework fully replaces the existing well notification regime and that this is made clear in the Guidelines.



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2.

3. Submissions

Drilling operations are carried out on a continuous basis and may require program alterations at short notice due to prevailing site conditions. Clarification needs to be provided on how the CER will manage and support 24 hour coverage during well work as there may be a number of notification changes on a particular well activity when carrying out operations. No explanation is given in the Safety Case Guidance document as to how this will be managed. IOOA believe that at a minimum, a web-based, online facility with defined input entries and requirements should be made available to the Industry so that updates can be submitted and approved in real time and unnecessary delays in operations avoided.

IOOA wishes to thank the CER for the opportunity to comment.

Yours sincerely,

Fergus Cahill,
Chairman, IOOA

Member Companies of IOOA: *ENI Ireland BV; ExxonMobil; Lansdowne Oil & Gas; PSE Kinsale Energy Ltd; Providence Resources Plc; Serica Energy; Shell E&P Ireland Ltd; Statoil, Chrysaor, San Leon, Repsol.*
