



*National Irish Offshore Engineering  
Verification Auditor*

21<sup>st</sup> December 2012  
Commission for Energy Regulation  
The Exchange  
Belgard Square North  
Tallaght  
Dublin 24

**Re: Consultation Paper on the Designated Petroleum Activities Document**

Following is information relating to present systems in place, to assist with the Consultation Process, referenced above.

Keane Offshore Integrity Ltd. is the nominated Body responsible for the National Irish Offshore Engineering Verification of Offshore Oil and Gas Activities. Since 1979, the Principal Engineer, Gerard Keane, has worked in the Offshore (Ireland and International), supporting the Department/PAD in all areas of Offshore Engineering: Drilling Installations, Well Design and Construction; Pipeline Design and Safety Parameters; Production Systems (Topside and Sub Sea).

This Role is Independent. Gerard Keane has never worked as an Employee of any Oil Company, and has never worked as a Consultant for any Oil Company.

The Role has always been Independent on behalf of The State, since 1979. Gerard Keane liaises with International Bodies, such as the UK Health & Safety Executive, the Norwegian Petroleum Directorate, the NPD (including its Offshore Experts, the Norwegian Petroleum Safety Authority (PSA)).

The National Verification Audit Process involves:

- Drilling Engineering;
- Well Test Procedures;
- Pipeline Engineering;
- Process Engineering;
- Oil and Gas Production Engineering;
- Construction and Maintenance of Oil and Gas Processing Facilities;
- Safety Procedures;
- Decommissioning Procedures.
- Verification Requirements for Mobile Offshore Drilling Units in Irish Waters including Examples of Written Verification Scheme and Safety Case Contents;

- Verification Requirements for Standby Safety Vessels/ERRVs in Irish Waters;
- Well Management Audit Scheme;
- Engineering Assessment of Well Test Programmes (Drill Stem Testing);
- Engineering Assessment and Verification of Extended Well Testing (EWT) Programmes;
- Engineering Assessment of Plans of Development (PODs) including Examples of POD Contents;
- Verification of New Works and Upgrades to Existing Systems;
- Topside Production Operations Self-Audit Verification System;
- Safety Case Assessment;
- ALARP Assessment;
- Written Verification Scheme Assessment;
- Hazard Identification;
- Risk Assessment.

All of the above Items are based on Gerard Keane's knowledge of International Oil Company Procedures and International Legislative Procedures, working in the field and at desktop.

These Procedures, in my view, are compatible with the Aims of the Consultation Paper.

I am sure that the Consultation Process will provide useful inputs and I look forward to liaising with the CER on this subject in the coming months.

My National Website [www.koil.ie](http://www.koil.ie) provides some useful information on the above. The Keane Offshore Integrity Ltd. Process incorporates and exceeds the scope of CER's Consultation Documents.

Further in-depth information is available, amounting to a 200 Page Document and a 600 Page Document.

Yours sincerely

*Gerard Keane*

Gerard Keane

Principal Offshore Oil & Gas Engineer