

**Petroleum Incident Regulations Consultation  
Respondent Meeting  
Senergy  
Wednesday Oct 17<sup>th</sup> 2013**

**Location:** Conference Call  
**Time:** 14.30

**Attended by:** Mike Richardson      Senergy  
Fred Algie                              Senergy  
Chris Dykes                             Senergy  
Liam Murphy                            CER  
Róisín Cullinan                        CER  
John Morgan                            CER Technical Advisor  
Martin Maple                            CER Technical Advisor

**Minutes:**

1. *Introduction*

- The meeting was opened by CER and attendees were introduced.

2. *Discussion on Senergy responses to the Consultation Paper and Draft Regulations:*

A number of points relating to the Senergy submission were discussed, including:

**Petroleum Incidents Response**

- **Definition of Petroleum Incident**

Senergy queried the lack of a definition of petroleum incident and stated that this could refer to incidents on petroleum infrastructure which were not related to petroleum. They stated CER should clarify further what is meant by this.

*CER Response:* CER stated that this includes incidents which are only related to petroleum infrastructure and activities carried out by petroleum undertakings, but it may include incidents that do not involve petroleum e.g. ship impact on an offshore platform.

- **Well Control Event**

Senergy commented that the paper's definition of a 'well control event' is not the industry definition of the term. Some incidents may be reportable as well control events but may not actually be. This may make it seem like Ireland has more well control events than other countries.

*CER Response:* CER said that they will consider the comments related to the terminology of 'well control event'.

- **BOP Operation**

Senergy stated that the BOP may be operated in a planned manner for activities such as maintenance and that this should not be a reportable incident.

*CER Response:* The CER will clarify this metric such that planned operations are not included.

- **Uncontrolled releases from Well**

Senenergy stated that this needed more guidance. Senenergy stated that backflow releases into the reservoir may not be of safety concern.

*CER Response:* CER said that they will consider the comments.

- **Uncontrolled Releases**

Senenergy stated that releases of gas may be very difficult to measure especially when the threshold is 1kg. They recommend tying it to releases which have to the potential to cause death or injury.

*CER Response:* CER stated that a defined lower value is preferred in order to provide clarity to the industry.

- **Dropped Objects**

Senenergy stated that there should be further guidance on what dropped objects need to be reported.

*CER Response:* CER stated that they are giving consideration to including dropped objects within the definition of prescribed occurrences and that appropriate guidance will be provided should this occur.

- **Incident notification Times**

Senenergy comment that the paper does not include a specified time within which certain types of incidents need to be reported.

*CER Response:* CER stated that an incident should be reported "as soon as practicable" in accordance with the Act.