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Date: 26<sup>th</sup> September 2013

Ref: Petroleum Incident Regulation Consultation Paper CER/13/187

Dear Roisín Cullinan,

Having reviewed the Draft Petroleum Incident Regulation Consultation Paper, Senergy and our Well Examiner, Chris Dykes International, have the following observations:

1. The proposed regulation doesn't include the definition of petroleum incidents – they do not include Section 13A(1) of the Act as per section 1.2.1 of the Introduction to this consultation paper. For the avoidance of doubt, perhaps the full list could be included.
2. The paper's definition of the term "Well Control Event" is not consistent with the industry's understanding of the term. The detection of H<sub>2</sub>S and the separation between wells will not necessarily lead to a well control event. Likewise, mechanical failure of SCE that could cause or contribute to an unintentional release is not generally considered to be a 'Well Control Event'. Would these fit better in the list of prescribed events?
3. 'Any event resulting in activation of the BOP' should possibly be reworded to include only 'unplanned events that result in closure of a BOP'. This removes issues where a BOP might, for example, be planned to be closed as a precaution prior to stripping tubing hangers out of hole in the event of gas being potentially trapped under the hanger.
4. The requirement to report 'Any uncontrolled release from a well' might benefit from including guidance about excluding backflow from the well due to formation ballooning effects.

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5. The uncontrolled release of 1kg of gas is very stringent and may be difficult to detect depending upon the circumstances and location. We would recommend considering the reporting of any uncontrolled releases of hydrocarbon gas which have the potential to cause death or major injury to any person.
6. Should the list of prescribed occurrences include 'dropped objects'? The notification form has a tick box for dropped objects but it is not clear whether dropped objects with a particular potential to injure personnel or cause damage to equipment are reportable where no injury or damage has occurred.
7. There is no specified timeframe for how soon a notification should be submitted following an incident. There is a statement in the attached Schedule which states "as soon as practicable". We suggest that this could be better defined. This definition might also include the required mode of notification, e.g. telephone, e-mail, or letter depending on the severity of the event. It would help to include guidance about submissions allowing for updates on the incident classification (e.g. a report might be submitted before it is known that an injury resulted in an extended absence from work).

We would be glad to meet with the CER to discuss any of the above at any time.

Yours sincerely,

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