

#	Title of Section	Proposed Policy Intentions	Comments Contents
Framework Regulations			
PART 3 – APPLICATIONS FOR AUTHORIZATIONS AND APPROVALS			
3.7	Well Approval	<p>(1) Subject to subsection (2), an operator who intends to conduct a well operation shall obtain a well approval.</p> <p>(2) A well approval is not necessary to conduct a wire line, slick line, or coiled tubing or similar operation through a tree if</p> <p>(a) the work does not alter the completion interval or is not expected to adversely affect recovery; and</p> <p>(b) the equipment, operating procedures and qualified persons exist to conduct the operations as set out in and approved under the authorization as a routine operation.</p> <p>(3) If the well approval sought is to drill a well, the application shall contain</p> <p>(a) a comprehensive description of the drilling program, a detailed geoscientific description of the prospect(s) and a description of any geohazard;</p> <p>(b) all digital data required to allow for an independent geohazard assessment; and</p> <p>(c) a well data acquisition program that allows for the collection of sufficient cutting and fluid samples, logs, conventional cores, sidewall cores, pressure measurements and formation flow tests, analyses and surveys to enable a comprehensive geophysical, geological and reservoir evaluation to be made.</p> <p>(4) The application shall contain</p> <p>(a) if the well approval sought is to re-enter, work over, complete or recomplete a well or suspend or abandon a well or part of it, a detailed description of that well, the proposed operation, work or activity and the rationale for conducting it, including barrier envelope diagrams to demonstrate two barrier envelopes throughout the operation;</p> <p>(b) if the well approval sought is to complete a well, in addition to the information required under paragraph (a), information that demonstrates that section 46 will be complied</p>	Does the well verification (reference 7.26) form part of the submission to obtain the well approval?

		<p>with; and</p> <p>(c) if the well approval sought is to suspend a well or part of it, in addition to the information required under paragraph (a), an indication of the period within which the suspended well or part of it will be abandoned or completed.</p> <p>(5) The Board shall grant the well approval if the operator demonstrates that the work or activity will be conducted safely, without waste and without pollution, in compliance with these Regulations (and any other applicable regulations under the Act).</p>	
PART 5 – CERTIFICATE OF FITNESS			
5.7	Certification Plan	<p>b. A comprehensive list of all Safety Critical Elements to the installations, vessels and facilities, as well as a description of how the associated performance standards are to be developed;</p>	<p>Suggest:</p> <p>b. A comprehensive list of all Safety Critical Elements to the installations, vessels and facilities, as well as a description of how the associated performance standards are to be developed for design, construction, installation and operational phase.</p>

5.7	Certification Plan	<p>c. A list of codes and standards that will be applied to installations, vessels, facilities, equipment and systems that are to be certified, and considering the entire lifecycle (inclusive of the design, construction, transportation, installation, commissioning, operation, maintenance and decommissioning etc.) of the project, and in the event no codes or standards are applicable, any studies and analysis that demonstrate the measures put in place will be adequate to reduce risks to as low as reasonably practicable;</p>	<p>It is not practical given the current regulations to give an option of "<i>in the event no codes or standards are applicable</i>". Suggest deleting this phrase.</p> <p>It is understood that perhaps the above phrase is meant to address any new technology that would require qualification. Suggest to explicitly state this (replace the above text). Any new technology requiring qualification and the relation to any safety critical elements should be identified and basis for Fit for Purpose evaluation and processes are defined.</p>
5.7	Certification Plan	<p>Prior to the submission of the scope of work by the Certifying Authority, the operator (and owner of the installation or vessel, if the operator is not the owner) shall submit a documented certification plan to the Chief Safety Officer that demonstrates how initial and ongoing regulatory compliance will be achieved with Part 6 of the Framework Regulations, those sections of Part 7 of the Framework Regulations listed in Schedule 1, those sections of the Occupational Health and Safety Regulations listed in Schedule 2 (TBD), and any requirements in Schedule 3 if the installation or vessel is to perform diving operations, including:</p> <p>a. A description of the installations, vessels, facilities, equipment and systems to be certified;</p>	<p>1. It should be clearly stated that the Certification Plan is expected to be submitted at the concept phase.</p> <p>2. Regarding 5.7 a.), the boundary limit for installation in the case of the subsea production system need to be further clarified. Currently it is unclear whether the downhole equipment including the packers, SCSSV, etc., and the casing need to be included in the certification scope. They are critical as barriers, but they are not mentioned in the definition of subsea production system.</p>

<p>5.9</p>	<p>Approval of the Scope of Work</p>	<p>b. provides the means for determining whether</p> <ul style="list-style-type: none"> <li>i. the environmental criteria for the region or site and the loads assumed for the installation or vessel are correct;</li> <li>ii. the safety critical elements defined in the certification plan for the installation or vessel are complete;</li> <li>iii. in respect any installation included in a development concept, the concept safety analysis required by s. 6.2 meets the requirements of that section;</li> <li>iv. in respect of a new installation or vessel, the installation has been constructed in accordance with a quality assurance program referred to in s. 6.1.</li> <li>v. the operations manual meets the requirements of s. 6.26;</li> <li>vi. the construction and installation of the vessel or the installation has been carried out in accordance with the design specifications established in Part 6, in those sections of Part 7 listed in Schedule 1, in those sections of the OHS regulations listed in Schedule 2 (e.g. OHS reg sections to be verified against), and for diving vessels and plants, in those sections of Framework or OHS regulations listed in Schedule 3;</li> <li>vii. the materials used in the construction and installation of the installation or vessel meet the design specifications set out in Parts 6 and 7; and</li> <li>viii. the structures, facilities, equipment and systems critical to safety, and to the protection of the natural environment, are in place and functioning appropriately;</li> </ul> <p>c. has clearly articulated the list of performance standards to be verified, and related Certifying Authority methods to verify them and for the ongoing fit for purpose determination; and</p>	<p>Should be considered:</p> <p>Understand the risk identified / quantified from concept safety analysis and the barriers / control measures in place to manage the same to an ALARP level.</p> <p>Any new technology should also be considered to ensure the risk from the same is minimized to an ALARP level.</p>
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5.10	Verification and Re-Certification	(1) The Certifying Authority shall specify, in the scope of work, the verification program to be undertaken by the Certifying Authority, including a schedule of activities to be conducted by the Certifying Authority to confirm compliance with certificate conditions, and verify the ongoing validity of the Certificate of Fitness until its expiration date.	Regarding the Certifying Authority's role to "verify the ongoing validity of the Certificate of Fitness until its expiration date", are there any details and specific requirements for the Certifying Authority to maintain the CoF for the operations such as workover?  Furthermore, are there any details and specific requirements for the life extension of the system and equipment including the subsea equipment to maintain the CoF?
5.11	Certification Period	(1) If the Certifying Authority determines that, when the installation or vessel is maintained in accordance with the programs submitted to it under subparagraph 5.5(a)(iii), the installation or vessel will meet the requirements of paragraph 5.2(a) for a period of at least five years, the Certifying Authority shall endorse on the certificate of fitness an expiration date that is five years after the date of issuance.	It is understood that this requirement for 5 year period is mainly applicable to Classed Units/Maritime requirements. It is however suggested that a more modern approach be considered at least when it comes to fixed installations. Attached is some more details on Risk based approach for Class to which a similar concept could be applied.
<b>PART 6 – INSTALLATION ANALYSIS, DESIGN, CONSTRUCTION AND MAINTENANCE</b>			
6.3	Innovations	(1) The operator shall ensure that any new proposed technology has been independently verified, through a systematic and comprehensive technology qualification process, to be safe and fit for purpose for its intended application.	It is understood that by "independently verified" a separate engineering firm is intended. It is recommended however to add additional text to required involvement by CA if a safety critical element (SCE) is involved. Without CA involvement in the TQ process for these items, there is no way for CA to verify the fit for purpose and fulfill its obligations.
6.12	Air Gap	Air gap: The operator shall ensure that every offshore installation (i.e. bottom founded, column stabilized) has sufficient air gap to operate safely and without incidents under the maximum anticipated environmental load conditions.	Reference is made to the recently updated requirements with respect to air gap for floating units by PSA (Norway). It is understood that this will be handled directly with the Boards (C-NLOPB and C-NSOPB).
<b>PART 7 – SYSTEMS AND EQUIPMENT DESIGN, OPERATION AND MAINTENANCE</b>			

7.2	Facilities for Inspection and Maintenance	<p>The operator shall ensure that every installation is designed and equipped to be accessible, and provided with clear markings and identifications of areas to be inspected, in a manner that allows safe and effective:</p> <p>a. monitoring, maintenance and inspection of the installation or pipeline; and...</p>	<p>Please elaborate whether there are any details monitoring requirements, or what level of monitoring mentioned here? Reference is made to comment against item 5.11 above where if monitoring and data is used for decision making the quality requirements on the data and sensors needs to meet certain Industry standards and norms. ( Refer to the attachment to see some of criteria for class to use sensor data for decision support as part of modern inspection and maintenance )</p>
<b>PART 13 – TERMINATIONS AND DECOMMISSIONING</b>			
13.1	Suspension or Abandonment of a Well	<p>The operator shall ensure that every well that is suspended or abandoned is left in a condition that</p> <p>(a) provides for isolation of all oil or gas bearing zones and discrete pressure zones; and, in the case of an onshore well, groundwater (COGOA only);</p> <p>(b) prevents any formation fluid from flowing through or escaping from the well-bore; and</p> <p>c) ensures it can be readily located.</p> <p>The operator shall verify the isolation of all oil and gas bearing zones and discrete pressure zones (in the case of an onshore well, groundwater) prior to suspending or abandoning the well.</p> <p>The means to verify the isolation of zones required by paragraph (a) is to be provided as part of the application for well approval for the suspension or abandonment of a zone or well. (to include in Phase I language)</p>	<p>It is not clear from the intent document what will be an expected CA and MWS involvement for Decommissioning and P&amp;A Operations. As this operation also creates significant risk to the people property and environment, these activities are also assumed to be carried out clearly demonstrating ALARP. Please clarify the intent.</p> <p>As cost of DC and P&amp;A is also shared by some of the provisional governments; it is assumed that a financial and technical due diligence is carried out at an appropriate level for these activities.</p>