



IADC
NORTH SEA
CHAPTER

International Association of Drilling Contractors

North Sea Chapter

OIL POLLUTION EMERGENCY PLAN

Template for

Non-Production Mobile Offshore Drilling Units

| Revision | Amendment | Date |
|-----------------|--|---------------|
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| 2. | Sect 7 (ii) - additional wording inserted re Communication and Interface Plan | 01 April 2016 |
| | Appendix 2 – added: ‘Guidance Notes for Preparing Oil Pollution Emergency Plans’ | |
| | References – added DECC guidance note details and link | |
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References

DISCLAIMER

This template has been developed by members of the North Sea Chapter of IADC for internal use by the membership. While every effort has been made to ensure the accuracy of the information contained within this document including review meetings with personnel from the Energy Development Unit of the Department of Energy & Climate Change (now Offshore Petroleum Regulator for Environment & Decommissioning), neither the North Sea Chapter of IADC, nor any of its members will assume liability for any use made thereof.

Section 1 Abbreviations and Definitions

Abbreviations

| | | |
|--------|---|---|
| BEIS | - | Department for Business, Energy and Industrial Strategy |
| CA | - | Competent Authority |
| CIP | - | Communication and Interface Plan |
| DECC | - | Department of Energy and Climate Change (now BEIS) |
| ICP | - | Independent Competent Person |
| IERP | - | Internal Emergency Response Plan |
| JNCC | - | Joint Nature Conservation Committee |
| MAH | - | Major Accident Hazard |
| MODU | - | Mobile Offshore Drilling Unit as defined by the International Maritime Organisation, and hereinto referred to as “the unit” |
| MMO | - | Marine Management Organisation |
| MRCC | - | Maritime Rescue Coordination Centre |
| NPI | - | Non-Production Installation |
| OIM | - | Offshore Installation Manager |
| OPEP | - | Oil Pollution Emergency Plan |
| OPRED | - | Offshore Petroleum Regulator for Environment & Decommissioning |
| OSC | - | On Scene Commander |
| PFEER | - | Prevention of Fire and Explosion, Emergency Response |
| PON1 | - | Petroleum Operation Notice Number 1 |
| SECE | - | Safety and Environmentally Critical Elements |
| SEMS | - | Safety and Environmental Management System |
| SNCB | - | Statutory Nature Conservation Bodies |
| TOOPEP | - | Temporary Operation Oil Pollution Emergency Plan |
| UK | - | United Kingdom |
| UKCS | - | United Kingdom Continental Shelf |

Definitions

| | |
|---------------------------------|---|
| Combined Operation | An operation carried out from an installation with another installation or installations for purposes related to the other installation(s) which thereby materially affects the risks to the safety of persons or the protection of the environment on any or all of the installations. |
| Customer | Contracting party under whose supervision the MODU undertakes petroleum related activities, and party responsible for the provision, submission and attainment of regulatory acceptance of relevant Location Specific TOOPEP, Installation OPEP or CIP. Customer could be the Well Operator (Person appointed to conduct the planning and execution of the well operations) or the Installation Operator (Person appointed to conduct any offshore oil and gas operations, but excluding the planning and execution of a well operation). |
| Installation | A stationary, fixed or mobile facility or a combination of facilities permanently inter-connected by bridges or other structures, which is used in offshore waters and for offshore oil and gas operations or in connection with such operations. Mobile offshore drilling units are considered to be Offshore Installations only when they are stationed in offshore waters for drilling, production or other activities associated with offshore oil and gas operations. |
| Interface Document | This document describes how the both Owner and Customer management system will be applied and it is the primary document used to record internal and external interfaces and control arrangements. |
| Non Production | An offshore installation other than a production installation and Installation includes MODU, light well intervention vessels, flotels and jack up accommodation/maintenance/light well intervention barges. |
| Oil Pollution Emergency Plan | Contingency plan (other than the National Contingency Plan) setting out arrangements for responding to incidents which cause or may cause marine pollution by oil, with a view to preventing such pollution or reducing or minimising its effect. |
| Owner | The person entitled to control the operation of a Non Production Installation. |
| Tier Level | Tier 1 Local (within the capability of the offshore installation operator or OIM); Tier 2 Regional (beyond the capability of the offshore installation operator (OIM) or requires additional contracted response); Tier 3 National (requires the use of national resources coordinated by the Operator). |

Section 2 Introduction

This document “OPEP Template for Non-Production Mobile Offshore Drilling Units was prepared by an IADC North Sea Chapter work group to meet the requirements specified for non-production installations (“NPI’s”), relevant to drilling contractors, under the Merchant Shipping (Oil Pollution Preparedness, Response and Co-operations Convention Regulations 1998 (as amended). To ensure consistency of approach it is recommended for use by IADC NSC members when producing their Non-Production Installation Oil Pollution Emergency Plan (OPEP) for individual mobile drilling units. The template contains information and operational instructions required by regulations and associated guidance laid out by the Competent Authority (“CA”); and has been based on the major accident risk assessment undertaken in preparation of the <UNIT NAME> UK Safety Case.

Prior to the transposition of the requirements of Directive 2013/30/EU of the European Parliament and of the Council on safety of offshore oil and gas operations into UK regulations, mobile drilling units were required by their Flag State in accordance with the requirements of Regulation 37 of Annex 1 of the International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 relating thereto (MARPOL 73/78 consolidated version of 2011) to produce a Shipboard Oil Pollution Emergency Plan (“SOPEP”). This requirement still exists for mobile drilling units whilst not on their working location and not being used for offshore oil or gas operations or in connection with such operations. However, whilst on their working location and being used for offshore oil or gas operations or in connection with such operations mobile drilling units have to comply with the requirements of the Merchant Shipping (Oil Pollution Preparedness, Response and Co-operations Convention Regulations 1998 (as amended) and provide an NPI OPEP as specified herein.

The Offshore Installations (Offshore Safety Directive) (Safety Case etc.) Regulations 2015 require the duty holder to perform the internal emergency response duties, taking into account the risk assessment undertaken during preparation of the most recent safety case for the installation and in addition where a mobile non-production installation is to be used for carrying out a well operation the duty holder must perform the internal emergency response duties taking into account the risk assessment undertaken during the notification of well operations. The Safety Case regulations describe the internal response arrangements as a description of the manner of performance of the internal emergency response duties in relation to that installation (PFEER), together with the oil pollution emergency plan produced pursuant to the Merchant Shipping (Oil Pollution Preparedness, Response and Co-operations Convention Regulations 1998 (as amended).

The NPI OPEP has to be submitted to the Secretary of State for Energy and Climate Change via the Competent Authority (“CA”) portal at least two months before offshore oil or gas operations are due to be commenced by the mobile offshore drilling unit. (Note: An approved NPI OPEP is a prerequisite for acceptance of the units Safety Case).

Section 3 Scope

This OPEP is only applicable whilst the mobile drilling unit is on its working location and being used for offshore oil or gas operations or in connection with such operation within the UKCS.

The OPEP is a live document when the *<UNIT NAME>* is working on location and being used for offshore oil or gas operations or in connection with such operation, however the relevant location specific Temporary Operation Oil Pollution Emergency Plan (TOOPEP) or Installation OPEP or Communication Interface Plan (CIP) must be used where applicable and referenced in the event of an oil spill in the UKCS.

The Customer is required to include all well/location specific information within the relevant location specific TOOPEP, Installation OPEP or CIP. Additionally, there is a requirement to ensure a description of how the oil spill response arrangements of the customer and the owner are to be coordinated to ensure effective oil spill response at all times. See the interfacing documentation as described in Section 7.

The purpose of the OPEP is to provide guidance to the Offshore Installation Manager (OIM) and supervisors on-board the *<UNIT NAME>* with respect to the steps to be taken when an oil pollution incident has occurred or is likely to occur.

This OPEP is provided to assist personnel in dealing with an unexpected release of oil. Its primary purpose is to set in motion the necessary actions to prevent or minimise the release of oil, while any mitigation plan will be covered in the relevant TOOPEP, Installation OPEP or CIP. Effective planning ensures that the necessary actions are taken in a structured, logical and timely manner.

It should be noted once submitted and accepted no alteration or revision should be made to any part of it without the prior approval of the Competent Authority.

Section 4 Unit Particulars

The Table below provides key information on the unit particulars and tank capacities of the **<UNIT NAME>**.

| | | |
|------------------------|-------------------|---------------------------------|
| NAME OF UNIT: | | |
| DISPLACEMENT: | | |
| IMO NUMBER: | | INTERNATIONAL CALL SIGN: |
| UNIT TYPE: | | |
| OWNER: | | |
| TELEPHONE: | | |
| SATELLITE PHONE | | |
| FAX: | | |
| E-MAIL: | | |
| CAPACITIES: | FLUID TYPE | TOTAL VOLUME / CAPACITY |
| | Diesel / Fuel Oil | Xxx m3 |
| | Lube Oil | Xxx m3 |
| | Hydraulic Oil | Xxx m3 |
| | Base Oil | Xxx m3 |
| | Mud Tanks | Xxx m3 |
| | etc. | |
| | etc. | |
| | etc. | |

Table: 4.1

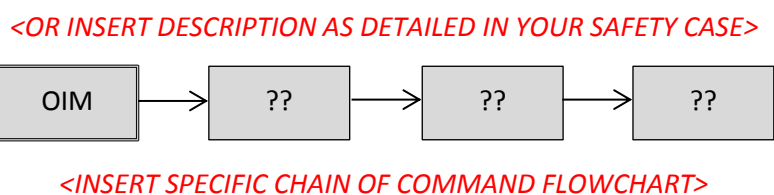
Section 5 Personnel Arrangements for Emergency Response

i) Positions of persons authorised to initiate emergency response procedures

An On Scene Commander (OSC) is held responsible and is authorised to initiate the emergency response procedures in the event of an oil spill. The **<UNIT NAME>** OIM assumes the role of OSC unless stated otherwise in the relevant location specific TOOPEP, Installation OPEP or CIP.

<UNIT NAME> Chain of Command

The **<UNIT NAME>** OIM heads the chain of command at all times, unless stated otherwise by the relevant location specific TOOPEP, Installation OPEP or CIP. Should the **<UNIT NAME>** OIM be incapacitated for any reason, the **<INSERT POSITION>** or **<INSERT POSITION>**, as most appropriate in the prevailing circumstances, shall assume the role of OIM.



ii) Positions of persons directing the internal response to an oil pollution incident

The **<UNIT NAME>** OIM shall direct the initial internal response to any oil pollution incident, unless stated otherwise by the relevant location specific TOOPEP, Installation OPEP or CIP, and continue to direct the response for all tier 1 incidents.

iii) Positions of persons responsible for liaising with the authorities for the external national contingency plan

In all tier 2 and tier 3 incident scenarios the positions of persons responsible for liaising with the authorities for the external national contingency plan are identified in the relevant location specific TOOPEP, Installation OPEP or CIP, and are summarised in the relevant interface document.

Section 6 Environmental Emergency Response Training and Exercises

All personnel expected to assume the role of on scene commander shall be trained to OPRED Level 1 on scene commander training with a three (3) yearly refresher, in line with legislation.

Training arrangements for personnel expected to liaise with the national contingency plan are identified in the relevant location specific TOOPEP, Installation OPEP or CIP, and are summarised in the relevant interface document.

Further to formal training, the <UNIT NAME> performs periodic emergency response drills, including OPEP drills, in line with legislation.

| Type of Exercise | Exercise Frequency | General Requirements |
|------------------------|--|--|
| Well Related Operation | Persons with pollution response duties must participate in a minimum of 1 (one) exercise per calendar year for each relevant TOOPEP/Installation OPEP or CIP | <p>Exercise scenarios must ensure that all relevant personnel are exercised with regard to their roles and responsibilities and for new TOOPEP, Installation OPEP or CIPs must be exercised at the earliest opportunity.</p> <p>A sufficient number of exercises must be completed to ensure all persons with responsibilities for implementing the TOOPEP, Installation OPEP or CIP participate in at least one exercise per calendar year*.</p> <p>The scenario should incorporate a sufficiently large liquid hydrocarbon release to sea (> 1 tonne).</p> <p>If two or more installations commence combined operations all relevant personnel should participate in an exercise to jointly test pollution response requirements at the earliest opportunity.</p> |

Table: 6.1

*This as a minimum requirement. If it is not operationally feasible to achieve, the CA Inspector shall be contacted by the relevant TOOPEP, Installation OPEP or CIP responsible persons and provided with justification as to why the requirement cannot be met.

Section 7 Communication and Interface Arrangements

i) NPI OPEP for Mobile Offshore Drilling Units

As stated in section 3, this document is written as a standalone OPEP in accordance with UKCS regulatory requirements, though is inherently linked to other aspects of the Emergency Response arrangements of the Owner, and ultimately integrating with the Internal Emergency Response Plan (IERP) as detail in *<OWNER SPECIFIC PROCEDURES REF>*

Below summarises the internal and external communication and reporting processes associated with the IERP:

<INSERT OWNER SPECIFIC FLOWCHARTS ETC>

The OSC is responsible for the notification of any oil release to the relevant authorities. The *<UNIT NAME>* OIM assumes the role of OSC unless stated otherwise in the relevant location specific TOOPEP, Installation OPEP or CIP.

| Hydrocarbon Volume to Sea | Statutory body | Areas within 40 km of the shoreline | Environmentally sensitive areas | Any other areas |
|---------------------------|----------------------------------|-------------------------------------|---------------------------------|--------------------|
| 0-1 tonnes | Aberdeen MRCC | PON1 | PON1 | PON1 |
| | Nearest Coastguard | Telephone | Telephone | Telephone |
| | OPRED | PON1 | PON1 | PON1 |
| | JNCC | PON1 | PON1 | PON1 |
| | Marine Scotland/MMO ¹ | PON1 | PON1 | PON1 |
| | SNCB ² | N/A | N/A | N/A |
| 1-25 tonnes | Aberdeen MRCC | PON1 | PON1 | PON1 |
| | Nearest Coastguard | Telephone | Telephone | Telephone |
| | OPRED | Telephone and PON1 | Telephone and PON1 | Telephone and PON1 |
| | JNCC | PON1 | PON1 | PON1 |
| | Marine Scotland/MMO | PON1 | PON1 | PON1 |
| | SNCB | Telephone | Telephone | N/A |
| >25 tonnes | Aberdeen MRCC | PON1 | PON1 | PON1 |
| | Nearest Coastguard | Telephone | Telephone | Telephone |
| | OPRED | Telephone and PON1 | Telephone and PON1 | Telephone and PON1 |
| | JNCC | Telephone and PON1 | Telephone and PON1 | Telephone and PON1 |
| | Marine Scotland/MMO | PON1 | PON1 | PON1 |
| | SNCB | Telephone | Telephone | N/A |

Note: Statutory oil spill reporting requirements contained within the relevant location specific TOOPEP, Installation OPEP or CIP supersede the reporting requirement contained in the above table.

¹ Marine Scotland if in Scottish water or MMO if in English water

² Statutory Nature Conservation Bodies are detailed in location specific TOOPEP, Installation OPEP or CIP.

ii) Relevant Location Specific TOOPEP, Installation OPEP or CIP

Whilst on location, and in connection with offshore oil and gas operations, this OPEP forms part of the Owner's wider IERP. Details of how the OPEP and the IERP interface with any relevant location specific TOOPEP, Installation OPEP or CIP, including details of any Combined Operations, Safety and Environmental Management System (SEMS) interfacing, early warning notification and specific emergency response procedures and communication arrangements, are contained within the associated interfacing documentation.

Where a NPI intends to undertake non-combined operations in a location within the scope of an existing Production Installation/Field OPEP and the primacy for the oil spill response remains with the production installation, then it is appropriate to use a Communication and Interface Plan to detail the proposed major change to the Production/Field OPEP.

The interfacing documentation shall include specific details of the agreed internal and external communication, including a relevant contact directory and reporting arrangements. These may also be contained within, or rely on in part, details of the relevant location specific TOOPEP, Installation OPEP or CIP.

During any response, the relevant location specific TOOPEP, Installation OPEP or CIP should be read in conjunction with both the wider emergency response documentation and interfacing documentation.

Section 8 Identification of Worst Case Scenario

The worst case potential release of oil to sea from the **<UNIT NAME>** on location (excluding well activities) would be the total loss of diesel inventory on-board as detailed in table 4.1.

The major accident hazards that could result in the total loss of inventory, whilst on location, are:

- Engine Room Fire & Emergency Generator Room Fire – i.e. worst case scenario is failure to control fire, escalation leading to loss of unit
- Structural Failure – loss of unit
- Reduction in Stability – loss of unit
- Ship Collision – holing of pontoon tanks / failure of leg chord and loss of unit
- Mooring Failure – loss of unit
- Helicopter Crash – fire escalation, leading to loss of unit

<INSERT OWNER SPECIFIC MAH TERMINOLOGY>

Given the worst case scenario being the release of marine diesel inventory, the below gives an indication of the anticipated worst case impact of this loss to the environment.

Diesel Fuel Oil

Diesel fuel is considered non-persistent oil (as compared to a heavier Bunker or crude oil product) even in the most calm sea conditions, as it will lose 40% of its volume due to evaporation within 48 hours in cold weather. Adverse weather will disperse the sheen into smaller slicks creating a greater surface area for evaporation. In open rough seas most of the volume released will be dispersed and evaporated within 5 days. Nevertheless, it still poses a threat to marine organisms and particularly birds if they happen to come into contact with the slick. [Canadian Ministry of Environment, British Columbia, 2014]

Diesel fuel has very high levels of light ends, evaporating quickly on release. The low asphaltene content prevents emulsification reducing its persistence in the marine environment. Due to its characteristics and subsequent behaviour when released, diesel oil is not considered to offer a significant threat to the environment in comparison with the risks posed from a formation Hydrocarbon release.

All other Major Accident hazards identified in the **<UNIT NAME>** Safety Case are related to well activities, and details of associated worst case scenarios are contained within the relevant location specific TOOPEP, Installation OPEP or CIP.

Oil and Gas Operation Diesel Inventory Worst Case

In all oil and gas operations the relevant location specific TOOPEP, Installation OPEP or CIP must contain a description of the potential worst case release of oil to sea.

In any offshore oil and gas operations where the loss of the MODU diesel inventory represents this worst case oil release, the customer is required to model the release of the entire diesel inventory in the appropriate TOOPEP, Installation OPEP or CIP.

Assessment of Environmental Effects

The location specific TOOPEP, Installation OPEP or CIP must contain an assessment of the potential environmental effects resulting from a release of oil.

Section 9 Arrangements for Limiting Risks to the Environment

The Owner has in place policies and procedures preventing risks to the environment, which are contained within the Environmental Management System. *<IF APPROPRIATE - THE OWNER ENVIRONMENTAL MANAGEMENT SYSTEM IS CERTIFIED TO ISO 14001:2004>*

In support of Owner's policies and procedures, the *<UNIT NAME>* operates and maintains equipment for the protection of the environment from an incipient major accident hazard. These are identified and recorded within the Written Scheme of Verification for Safety and Environmental Critical Elements (SECEs). Appropriate performance standards along with verification and assurance activities for assessing continuing suitability have also been identified and are subject to Independent Competent Person (ICP) verification in accordance with legislation.

Further to the *<UNIT NAME>* equipment, various Third Party (Temporary) Systems have been identified during the Major Accident Hazard and Environmental Risk Assessment process as being SECEs, such as:

- The Cement Unit
- Well Testing System
- Mud Logging Instrumentation System, etc.

<INSERT OWNER SPECIFIC DETAILS>

The ICP is also appointed to verify the continued suitability of such systems as SECEs.

Further procedures are in place for the operational aspects of SECEs, such as; Well Control Procedures, Marine Procedures and Emergency Response Procedures. These procedures anticipate scenarios from incipient major accident hazards and the subsequent actions required by designated personnel to limit the risks to personnel and the environment.

It is the responsibility of the customer to ensure that the location specific response checklists detailing actions required during an oil spill response and the arrangements for limiting risks to the environment are contained within the relevant location specific TOOPEP, Installation OPEP or CIP.

Section 10 Description of Spill Response Equipment and Resources

The <UNIT NAME> carries no inventory of equipment or resources to respond to an oil spill to sea. In addition there is no equipment or resources, under the Owner's control, located onshore to respond to an oil spill to sea.

<IF APPROPRIATE – INSERT OWNER DETAILS OF ANY INVENTORY OR EQUIPMENT HELD>

For all scenarios where there is a standby vessel in attendance, the OSC (or deputy) may have at his disposal an inventory of oil dispersant. Details of any such dispersant will be found in the relevant location specific TOOPEP, Installation OPEP or CIP, which includes evidence that a prior assessment of the dispersant has been carried out to minimise environmental damage. This dispersant may be deployed on their command, without prior approval, should they consider the safety of the installation or the persons thereon, at risk.

The location specific TOOPEP, Installation OPEP or CIP will describe the equipment and resources available, including technical and non-technical measures in place to respond to a Tier 1,2 or 3 oil spill incident. The implementation of which is designed to prevent, reduce or offset the environmental effects of the oil release.

Section 11 Spill Response Effectiveness

An estimate of the oil spill response effectiveness, including consideration of the below environmental conditions must be contained within the relevant location specific TOOPEP, Installation OPEP or CIP.

- Weather, including wind, visibility, precipitation and temperature
- Sea states tides and currents
- Presence of ice and debris
- Hours of daylight; and
- Other known environmental conditions that may influence the efficiency of the response equipment or the overall effectiveness of a response effort.

Section 12 Review and Revision

This document must be reviewed and if necessary amended in the following circumstances:

- Where any proposed change which constitutes a major change which affects or could affect the validity or effectiveness of an OPEP to a material extent.
- After a period of 5 years from the date the OPEP was first approved and a minimum of every five years thereafter.

When this plan has been approved by the Competent Authority, no alteration or revision shall be made to any part of it without the prior approval of the Competent Authority.

Appendices

Appendix 1: Legislative Compliance Matrix

| Merchant Shipping (Oil Pollution Preparedness, Response and Co-operation Convention) Regulations 1998 (As amended); Schedule 2 requirements | | NPI OPEP Location |
|---|--|-------------------|
| 1) | Does the NPI OPEP state which positions would be responsible for initiating and directing an oil spill response? | Section 5 |
| 2) | Does the NPI OPEP state which position would be responsible for the notification of any oil release to the relevant authorities? | Section 7 |
| 3) | Are the relevant training and exercise requirements detailed within the NPI OPEP? | Section 6 |
| 4) | Is the maximum oil inventory of the NPI given within the NPI OPEP? | Section 4 |
| | Does the NPI OPEP contain a commitment to link to the relevant Production Installation / TOOPEP / Communication and Interface Plan and detail the estimated worst case release scenario? | Section 8 |
| 5) | Does the OPEP detail arrangements in place for limiting risks to the environment, which include response checklists detailing who would undertake any necessary actions during a response? | Section 9 |
| 6) | Does the NPI OPEP state that the required well/location specific information must be included in the relevant Production Installation/Field OPEP or TOOPEP? | Section 10 |
| 7) | Does the NPI OPEP state that the required well/location specific information must be included in the relevant Production Installation/Field OPEP or TOOPEP? | Section 11 |
| 8) | The NPI OPEP must also state that any well / location specific information relating to dispersants will be detailed within the relevant Production Installation/Field OPEP or TOOPEP. | Section 10 |
| 9) | Does the NPI OPEP contain a statement that the measures identified to prevent, reduce or offset the potential effects resulting from a release of oil must be provided in the relevant Production Installation/Field OPEP or TOOPEP. | Section 10 |
| 10) | Does the NPI OPEP contain a contact directory and detail the method by which reporting to the relevant Authorities will take place (i.e. ePON1 reporting arrangements)? | Section 7 |
| | The NPI OPEP must also state that any well / location specific information relating to notifications will be detailed within the relevant Production Installation/Field OPEP or TOOPEP. | Section 7 |

Appendix II: Guidance on Requirements for Non Production Installation (NPI) OPEP

(Extract from DECC, 'Guidance Notes for Preparing Oil Pollution Emergency Plans' Rev2 August 2015)

| Assessment Table Requirement | | Guidance |
|------------------------------|--|--|
| 1. | Response Initiation / Direction | <p>The NPI OPEP must detail the positions of persons on the installation who will initiate and direct the oil spill response.</p> <p>The NPI OPEP must state that, in the scenario when the response to any incident is directed by person(s) who are not the owner of the NPI that further arrangements explaining the interface will be described in the relevant TOOPEP or Communication and Interface Plans</p> |
| 2. | Notification and Liaison with Regulatory Authorities and Statutory Bodies | <p>The NPI OPEP must detail the positions of persons responsible for the notification of any oil release to the relevant authorities.</p> <p>The NPI OPEP must state that when the response requires liaison with the authority responsible for the NCP (MCA) it will be described in the relevant TOOPEP or Communication and Interface Plan.</p> <p>The relevant authorities and reporting requirements are listed in Appendix D.</p> |
| 3. | Training and Exercises | <p>The NPI OPEP must detail all relevant Oil Pollution Response training and exercise requirements in accordance with the guidance provided in Appendix C.</p> |
| 4. | Worst Case Release | <p>The NPI OPEP must describe the worst case oil release applicable to the NPI.</p> <p>The Production Installation/Field OPEP or TOOPEP will detail the worst case oil release applicable upon commencement of oil & gas activities. This will likely be a loss of well control or pipeline inventory. However it is accepted in certain circumstances the NPI oil inventory may represent the worst case (e.g. when drilling dry gas wells). In such cases the release of this inventory must be modelled in the TOOPEP or Communication and Interface Plan in accordance with the modelling guidance in Appendix B.</p> |
| 5. | Limiting Environmental Risk and Response Arrangements | <p>The NPI OPEP must contain a description of the steps taken to limit the risks to the environment. This may include references to the safety case and/or by demonstrating that suitably robust systems to train staff and assess competence and that relevant procedures are in place, particularly with regard to emergency response.</p> <p>The OPEP must identify all relevant pollution response roles and responsibilities. This should sequentially detail actions required from the initiation of the response to its conclusion and should effectively highlight 'who does what and when'. This requirement may be delivered by the use of checklists.</p> |

| | | |
|-----|--|---|
| 6. | Resources Available | <p>The NPI OPEP must state that the required well/location specific inventory of oil spill response equipment will be provided in the Production Installation/Field OPEP or TOOPEP.</p> <p>The NPI OPEP must also detail any additional oil spill response equipment maintained by the NPI owner that is not listed in the Production Installation/Field OPEP or TOOPEP.</p> |
| 7. | Response Effectiveness | <p>The NPI OPEP must state that the required well/location specific oil spill response effectiveness information will be provided in the Production Installation/Field OPEP or TOOPEP.</p> |
| 8. | Dispersants | <p>The NPI OPEP must state that any well / location specific information relating to dispersants will be detailed within the Production Installation/Field OPEP or TOOPEP.</p> |
| 9. | Potential Environmental Effects | <p>The NPI OPEP must state that the location specific TOOPEP, Installation OPEP or Communication and Interface Plan will contain an assessment of the potential environmental effects resulting from a release of oil including modelling and environmental sensitivities.</p> <p>The NPI OPEP must state that measures identified to prevent, reduce or offset the potential effects resulting from a release of oil will be provided in the Production Installation/Field OPEP or TOOPEP.</p> |
| 10. | Reporting Requirements | <p>The NPI OPEP must contain a contact directory and detail the method by which reporting to the relevant Authorities will take place (i.e. PON1 reporting arrangements). See Appendix D.</p> <p>This information will be supplemented by well/location specific information within the Production Installation/Field OPEP or TOOPEP.</p> |

References

- Canadian Ministry of Environment, British Columbia, 2014. Environmental Impact Assessment, '*FATE, EFFECT, BEHAVIOUR AND ENVIRONMENTAL IMPACTS AS THE PRODUCTS WEATHER*' [online] Available from:
<http://www2.gov.bc.ca/gov/topic.page?id=E4DC95E7E5BE4EA280896786353949A9>
- Department of Energy & Climate Change, '*Guidance Notes for Preparing Oil Pollution Emergency Plans*' Rev2 August 2015:
<http://www.hse.gov.uk/osdr/assets/docs/o pep-guidance-revision-2-august-2015.pdf>