

Floatel Victory Communication and Interface Plan

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Preface

Document Management and Document Control Procedure

Communication and Interface Plans (CI Plans) prepared by or on behalf of BP Exploration Operating Company Limited (hereinafter referred to as 'BP') are controlled documents. All document holders, detailed within the distribution list, are assigned a specific copy number.

This document will be subject to review on an annual basis and updated as necessary by BP to:

- ensure compliance with regulatory requirements and current industry practice
- reflect exercise/audit findings and recommendations
- include changes to operational activity and procedures
- remove any activities which are, or have, become obsolete
- incorporate current contact details.

This document has an approved lifespan of five years from the initial submission date to the Department of Energy and Climate Change (DECC) and it shall be submitted in its entirety for re-approval 21 days before that time. It is the responsibility of the registered copy holder to maintain the accuracy of this document. All updates must be promptly inserted and receipt acknowledged.

Additional Copyholders

Copy Holder Name	Location	Copy Type	Copy No
OIM, Floatel Victory	Amec (City View) Aberdeen	Paper and CD	17

Department of Energy and Climate

Change Letter of Approval

As approved under SI 1998/No 1056 The Merchant Shipping (Oil Pollution Preparedness, Response and Co-operation Convention) Regulations 1998 and SI 2002/No 1861 The Offshore Installations (Emergency Pollution Control) Regulations 2002.

DECC Reference Number: 15004a

**THE MERCHANT SHIPPING (OIL POLLUTION PREPAREDNESS,
RESPONSE AND CO-OPERATION CONVENTION) REGULATIONS 1998**

**THE OFFSHORE INSTALLATIONS (EMERGENCY POLLUTION CONTROL)
REGULATIONS 2002**

APPROVAL OF OIL POLLUTION EMERGENCY PLAN

Pursuant to the above-mentioned Regulations, the Secretary of State hereby approves the **BP Exploration Operating Company Ltd, Clair Ridge - Floatel Victory Communication and Interface Plan** oil pollution emergency plan which was received by the Department on **23 April 2015** and updated on **23 May 2015**.

For and on behalf of the Secretary of State



Authorised to act in that behalf

4 June 2015

Abbreviations List

Abbreviation	Description
BST	Business Support Team
CI	Communications and Interface
DECC	Department of Energy and Climate Change
DCR	Dyce Control Room
ERRV	Emergency Response Recovery Vessel
EOM	Emergency Operations Manager
HMCG	Her Majesty's Coastguard
IC	Incident Commander
IMT	Incident Management Team
JNCC	Joint Nature Conservation Committee
NPI	Non-production Installation
OCU	Operations Control Unit
OIM	Offshore Installation Manager
OPEP	Oil Pollution Emergency Plan
Ops Rep	Operator Representative
OSIS	Oil Spill Information System
OSRL	Oil Spill Response Limited
PON	Petroleum Operations Notice
SOSREP	Secretary of State's Representative
UKCS	United Kingdom Continental Shelf

Refer to the **Clair Ridge Offshore Oil Pollution Emergency Plan (CLB-PLN-4.6-1002)** **Glossary of Terms** for other acronyms not listed above.

1 Operations at the Clair Ridge within the Clair Field

This Communications and Interface Plan (CI Plan) has been prepared to cover the Floatel Victory Accommodation Unit when on location at the Clair Ridge platform, Block 206/8. The Accommodation Unit covered by this CI Plan is the Floatel Victory Accommodation Unit (hereinafter referred to as 'Floatel Victory') operated by Floatel International.

1.1 Scope of Document

This document has been the subject of consultation and has been approved by the relevant statutory authorities. It details the roles and responsibilities of BP Exploration Operating Company Limited (hereinafter referred to as 'BP') as platform operator; those of Floatel Victory and Floatel International, and the communication pathways to be followed in the event that the Oil Pollution Emergency Plan (OPEP) for Clair Ridge (the 'Clair Ridge OPEP') requires to be activated. In the event of a hydrocarbon release to sea resulting from the Floatel Victory this CI Plan should be referred to jointly with the **Clair Ridge Offshore Oil Pollution Emergency Plan (CLB-PLN-4.6-1002)**, the **Floatel Victory NPI OPEP** and **Onshore Oil Pollution Emergency Plan (UK-PLN-4.6-1002)**.

1.2 Accommodation Unit Information

Floatel Victory Accommodation Unit Information			
Description		The Floatel Victory is an offshore accommodation unit	
ETA/ETD at Clair Ridge		Arrival: 15 June 2015	Departure: Q4 2016
Latitude		60° 44' 11.142" N	
Longitude		02° 29' 42.063" W	
Hydrocarbon Inventories	Fuel Oil	1890.72m ³	
	Lub Oil	41.87m ³	
	Hydraulic oil	2.47m ³	
	Base oil	0m ³	
	Helifuel	7.26m ³	
Contractor		Floatel International	

1.3 Tiered Response Resources

Refer to **CLB-PLN-4.6-1002 Section 1 ROff 1.14 Tiered Response Resources** for information on the resources available at the field.

1.4 Hydrocarbon Release Response Primacy Information

1.4.1 BP/Accommodation Unit Hydrocarbon Release Response Primacy

Hydrocarbon Release Response Primacy Information	
Licensee/Operator	BP Exploration Operating Company Limited
Tier 1 Response Primacy	Clair Ridge OIM
Tier 2/3 Response Primacy	BP Exploration Operating Company Limited

Tier 1 – In the event of a Tier 1 hydrocarbon release to sea from the Floatel Victory when on location at the Clair Ridge within the Clair Field, the Clair Ridge OIM will take primacy for co-ordinating the response.

Tier 2/3 – In the event of a Tier 2/3 hydrocarbon release to sea from the Floatel Victory when on location at the Clair Ridge within the Clair Field, the BP Incident Management Team (IMT), based in Dyce, will take primacy for co-ordinating the response.

1.5 Hydrocarbon Release Response Interface

1.5.1 Communications Offshore

In the event of a hydrocarbon release to sea from the Floatel Victory when on location at the Clair Ridge Platform, the Floatel Victory OIM (or his/her delegate) will provide all necessary co-operation to BP through the Clair Ridge OIM. The Floatel Victory's OIM will contact the Clair Ridge OIM, who in turn will contact the BP Dyce Control Room (DCR).

The Clair Ridge OIM offshore or his/her delegate will complete the initial notifications and confirm to the BP Dyce IMT. Initial Petroleum Operations Notice No 1 (PON1) telephone notifications will be undertaken immediately after the initial sighting of the release by the Clair Ridge OIM or suitable delegate. The ePON1 will be completed offshore within 6 hours by the Clair Ridge OIM in consultation with the Floatel Victory OIM and will be submitted to the relevant authorities in accordance with **CLB-PLN-4.6-1002 Section 1 ROff 1.2 Notifications**.

1.5.2 Offshore Response Action Plan

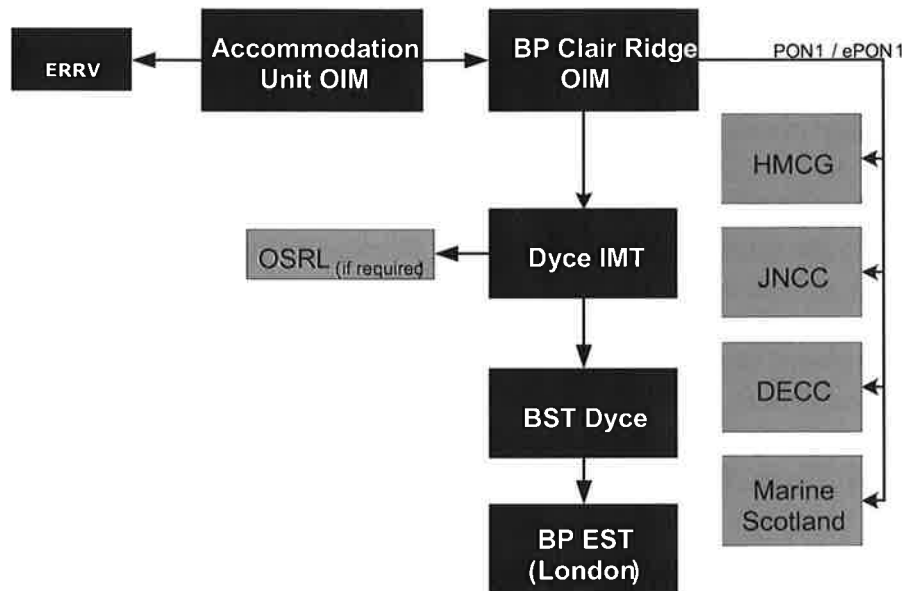
In the event of a hydrocarbon release to sea from any asset associated with the Clair Ridge platform, **CLB-PLN-4.6-1002 Section 1 ROff 1 Offshore Response Action Plan** details the appropriate steps that will be taken.

1.5.3 Communications Onshore

In the event of a hydrocarbon release to sea from the Floatel Victory when on location at the Clair Ridge Platform, the Floatel Victory OIM will contact the Clair Ridge OIM who in turn will contact the BP DCR. The DCR is a 24-hour manned facility, which will notify the BP Incident

Commander (IC). Once the extent of the incident is known, the BP IC may choose to mobilise the BP Duty IMT via pager. Once assembled, the BP IC will assume overall command for the incident response. The BP Dyce IMT will manage all communications to and from regulatory bodies, the Floatel Victory, neighbouring installations and response contractors, for example Oil Spill Response Limited (OSRL). All command decisions concerning strategies, mobilisation and movement of resources will be made by the BP Dyce IMT in conjunction with the relevant regulatory bodies. This will be in accordance with **UK-PLN-4.6-1002 Section 1 ROn 1.1 BP Dyce IMT Checklists**.

The diagram below illustrates the initial response notification chain that mobilises the onshore response organisation.



1.5.4 Nearby Installations

In the event of a hydrocarbon release to sea from the Floatel Victory when on location at the Clair Ridge Platform, with the potential to impact nearby installations as detailed in **CLB-PLN-4.6-1002 Section 1 ROff 1.2.3 Additional Notifications**, the Clair Ridge OIM shall ensure they are informed.

1.5.5 Floatel International Contact Details

Floatel International
Johannefredsgatan 4
SE-431 53 Mölndal
Sweden

Sweden Office reception: +46 31 352 07 01

Floatel Victory OIM ***REDACTED***

1.5.6 SOSREP Interface

In the event of the Secretary of State's Representative (SOSREP) being mobilised, the Operations Control Unit (OCU) will be located in the River Annan Meeting Room at BP, Dyce. Details of SOSREP arrangements can be found in the **UK-PLN-4.6-1002 Section 2 Paragraph 4 SOSREP Arrangements**. The dedicated OCU Representatives will consist of the Emergency Operations Manager (EOM) and Operator Representative (Ops Rep) who will both be BP personnel (further details are found in **UK-PLN-4.6-1002 Section 2 Paragraphs 4.3.1 Emergency Operations Manager** and **4.3.2 Operator Representative**).

In the event of a hydrocarbon release to sea from the Floatel Victory, a Duty Manager or appropriate designate, will mobilise to the BP Dyce IMT to fulfil the role of Operator Representative (Accommodation Unit Contractor) in the OCU and will liaise with the BP Dyce IMT, Business Support Team (BST) and OCU as required.

2 Hydrocarbon Inventories and Modelling

2.1 Hydrocarbon Storage Inventories

2.1.1 Floatel Victory

Fluid Type	Total Volume/Capacity
Vessel Fuel (Diesel)	1890.72m ³
Lub Oil	41.87m ³
Helifuel	7.26m ³
Hydraulic oil	2.47m ³

2.2 Hydrocarbon Release Modelling

In order to establish the potential impact within the marine environment, this section identifies the potential worst-case release scenarios which could result from the Floatel Victory as detailed in this CI Plan.

In relation to a worst-case release to sea of the entire diesel inventory of the Floatel Victory, multi-seasonal stochastic modelling has been performed to show the behaviour of the diesel.

Stochastic modelling for this CI Plan has been run using the Oil Spill Contingency and Response Model (OSCAR) version 6.5.1, developed by SINTEF. This has been used to illustrate percentage probability of beaching, and the expected timeframes for the slick to cross median lines and reach land. 100 trajectories were run for each of the four seasons to create the stochastic results for Scenario 1.

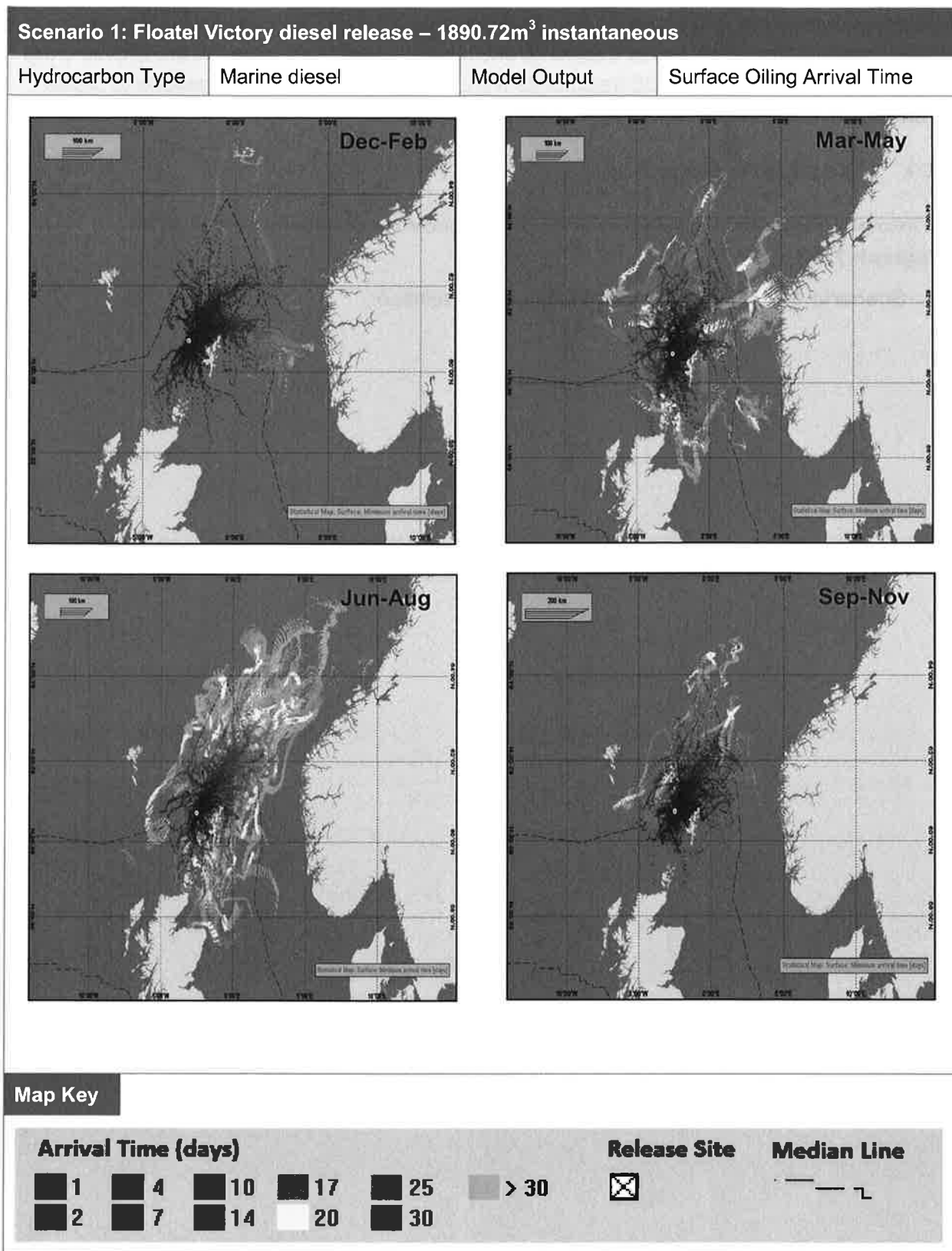
2.2.1 Stochastic Modelling

The following stochastic model was run using the modelling parameters provided in **Paragraph 2.3.2**.

- **Scenario 1:** 1890.72m³ Floatel Victory diesel release

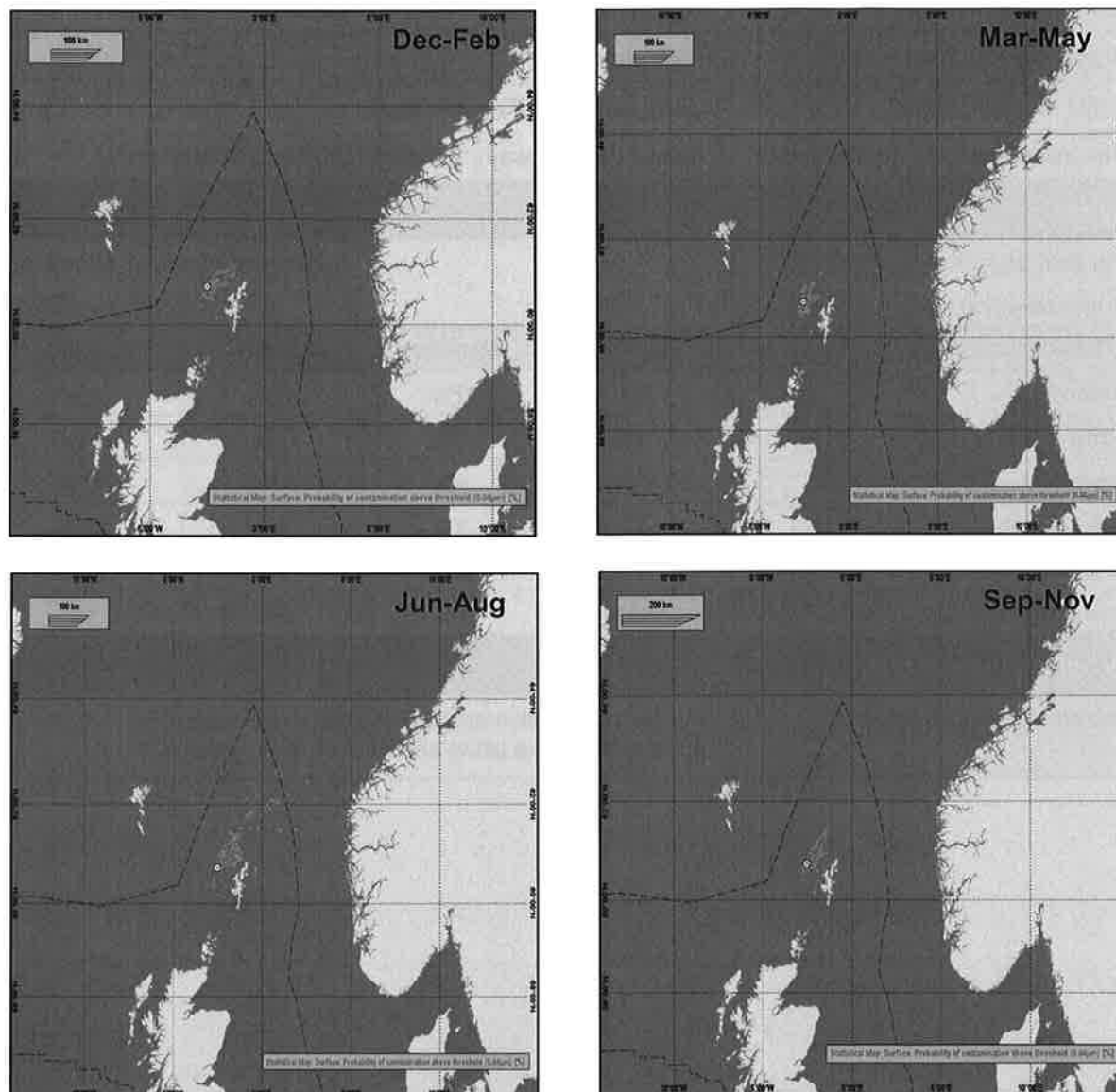
2.3 Scenario Outputs

2.3.1 Stochastic – Floatel Victory Diesel Release



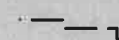
Scenario 1: Floatel Victory diesel release – 1890.72m³ instantaneous

Hydrocarbon Type	Marine diesel	Model Output	Probability of Surface Oiling
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Map Key
Probability of Surface Oiling (%)

5 - 10	20 - 30	40 - 50	60 - 70	80 - 90
10 - 20	30 - 40	50 - 60	70 - 80	90 - 100

Release Site

Median Line


Oil Spill Modelling Summary – Scenario 1				
Spill scenario/descriptor	Floatel Victory – total loss of 1890.72m ³ diesel inventory			
Spill dimensions (length and area)	330km	3227km ²		
Will spill cross a median line?	<5% probability			
Identify median line(s)	UK-Norway, UK-Faroe Islands			
Time until oil crosses median line(s)	4 days (UK-Norway), 3.5 days (UK-Faroe Islands)			
Landfall				
Time until beaching	20 hours minimum (Shetland)			
Volume beached	1701m ³ (maximum)			
Predicted locations	Dec-Feb	Mar-May	Jun-Aug	Sep-Nov
Shetland	2%	2%	6%	2%
Orkney	1%	3%	1%	<1%
Norway	<1%	1%	<1%	<1%
North Scotland	1%	1%	1%	<1%
Fair Isle	1%	2%	1%	<1%
Faroe Islands	<1%	1%	2%	<1
Key Sensitivities at Risk				
Sensitivities/sites of concern	Full list of sensitive areas projected to be subject to surface/shoreline oiling are detailed in Appendix 1 .			

2.3.2 Modelling Parameters – Floatel Victory Diesel Release

Scenario 1: Oil Spill Modelling Parameters Well/Inventory Loss Parameters								
Loss from well/FPSO/ rig/Other (please specify)		Offshore accommodation unit		Instantaneous loss?			Yes	
Worst case volume		1890.72m ³		Will the well self-kill?			No	
Flowrate		N/A		If yes then when?				
Justification for predicted worst case volume		Total onboard marine diesel inventory						
Location								
Spill source point		Latitude		60° 44' 11.142" N		Longitude		02° 29' 42.063" W
Installation/Facility name		Floatel Victory		Quad/block		206/8		
Hydrocarbon Properties								
Hydrocarbon name		Marine diesel						
Assay available		Yes		Was an analogue used for spill modelling?			No	
	Name	ITOPF category	Specific gravity	API	Viscosity (temp °C)	Asphaltene content (%)	Wax content (%)	Pour point (°C)
Fuel loss	Marine diesel	Group II	0.843	36.4	9.2cP (10)	N/A	N/A	-36
Metocean Parameters								
Air temperature		10°C		Sea temperature		6.5 to 10.5°C (depending on depth)		
Wind data		Data period:		2004 to 2006 (3 years)				
Wind data reference		Imperial College London ReEMS						
Current data		Data period:		2004 to 2006 (3 years)				
Current data reference		Imperial College London ReEMS						
Modelled Release Parameters								
Surface or subsurface		Surface			Depth		0m	
Release duration		N/A			Instantaneous?		Yes	
Persistence duration		44 days			Release rate		Instantaneous	
Total simulation time		50 days			Total release		1890.72m ³	
Oil Spill Modelling Software								
Name of software		MEMW (OSCAR)			Version		6.5.1	

2.4 Response Strategy

It is not recommended to apply dispersant to a diesel release to sea which would naturally disperse. Any hydrocarbon release resulting from a diesel release to sea will be closely monitored throughout its existence, using air and sea resources and other sea users will be warned of the sheen presence and location.

Please refer to the **CLB-PLN-4.6-1002 Section 1 ROFF 1.13 Response Strategy Options** and **ROFF 1.16 Response Strategy Guidance** for more detailed response strategy information.

3 Training and Testing

Floatel International and BP have in place a schedule of emergency response exercises which includes pollution response exercises.

An exercise will be conducted offshore once per shift per year. Please refer to **CLB-PLN-4.6-1002 Section 2 Paragraph 8.1.1 Training and Exercise Programme** and **UK-PLN-4.6-1002 Section 2 Paragraph 6 Plan Testing and Training** for further details on exercises and record keeping.

Personnel	Training
OIM	<ul style="list-style-type: none"> Offshore On-scene Commander (OIM) DECC 1 level training repeated every 3 years.
Chief Officer Safety Officer	<ul style="list-style-type: none"> Additional Floatel Victory crew undertake Offshore On-scene Commander (OIM) DECC 1 level training repeated every 3 years.
Personnel	Exercises
Vessel Crew	<ul style="list-style-type: none"> OPEP exercise to ensure familiarisation of OPEP. One per shift per year.

Appendix 1 – Scenario 1

Sensitive Areas with >5% probability of surface oiling and/or >1% probability of shoreline oiling

United Kingdom
Doomy and Whitemaw Hill ¹
Faroe-Shetland Sponge Belt ²
Fetlar to Haroldswick ²
Hermaness, Saxa Vord and Valla Field ³
Melby ¹
Muckle Roe Meadows ¹
North-east Faroe-Shetland Channel ²
Pobie Bank Reef ⁴
Ronas Hill – North Roe and Tingon ^{1, 3, 4, 5}
Sandness Coast ¹
Seas off Foula ³

1 Site of Special Scientific Interest

2 Nature Conservation Marine Protected Area

3 Special Protected Area

4 Special Area of Conservation

5 Ramsar Site

