

Overview of update

The text below provides an update to 'Guidance Notes on the Offshore Chemical Regulations 2002 (As Amended 2011)' and replaces paragraphs 4.15 to 4.25. The update covers all annual Well Intervention Operations (WIA) chemical permit applications for activities that are due to commence on or after the 1st January 2015.

Well intervention / work-over operations

Term permits are required for the use and/or discharge of chemicals during well intervention / work-over operations in connection with offshore petroleum activities in the relevant area, or in connection with offshore gas storage and unloading activities in the reserved area, and can be applied for by submitting a Chemical Permit (CP) Subsidiary Application Template (SAT) under a Well Intervention Operations (WIA) Master Application Template (MAT).

The WIA can be used to apply for a CP for a single well intervention / work-over operation or for a series of well intervention / work-over operations to be undertaken at the same geographical location. The same geographic location is defined as a series of intervention / work-over operations undertaken from a single installation and/or using a MODU or well intervention vessel located within the safety zone of that installation; or a series of intervention / work-over operations undertaken at the same field (including remote wells) from an installation and/or from a MODU or well intervention vessel. Where there is more than one installation serving the field and if the well intervention / work-over operations are to be undertaken from each installation serving that field then a separate WIA MAT will be required for each installation.

The period of validity of well intervention / work-over CP will either be related to the duration of the proposed operations, or will be valid to cover a number of operations during a single calendar year. In both cases, where any chemical use and/or discharge has not been included in the original application and permit, it is possible to apply for a variation to the CP, but the application must be made in advance of the proposed additional chemical use and/or discharge. It is also possible to apply for a variation to extend the duration of a CP relating to a specific operation, providing the application is made before the current date of expiry. However, an "annual" permit covering multiple intervention / work-over operations will always expire on 31 December of the relevant calendar year. The 'annual' permit is not required to be valid from the 1 January unless operations are to be undertaken from that date and therefore can be applied for anytime during the calendar year.

All wells where well intervention / work-over operations are to be undertaken as part of the campaign should be identified and included in the WIA MAT. Where any wells at the same geographical location have not been included in the original application, it is possible to apply for a variation to the CP to include the wells, but the application must be made in advance of the proposed well intervention / work-over operations being undertaken at the additional wells.

All MODUs / well intervention vessels used for undertaking intervention / work-over operations should be identified in the WIA MAT. Where any MODUs / well intervention vessels have not been included in the original application, it is possible to apply for a variation to the CP to include the MODU/well intervention vessel, but the application must be made in advance of the proposed well intervention / work-over operations being undertaken from the MODUs / well intervention vessels.

Well suspension and abandonment operations

Term permits are required for well suspension and abandonment operations in connection with offshore petroleum activities in the relevant area, or in connection with offshore gas storage and unloading activities in the reserved area, if the proposed activities involve the use and/or discharge of offshore chemicals.

In the same way that the WIA can be used to apply for a CP for a single well intervention / work-over operation or for a series of well intervention / work-over operations, the WIA can be used to apply for

a CP for a single well suspension or abandonment operation or for a series of well suspension or abandonment operations to be undertaken at the same geographical location. The same geographical location is defined as a series of well suspension / abandonment operations undertaken from a single installation and/or using MODU or well intervention vessel located within the safety zone of that installation; or a series of well suspension / abandonment operations undertaken at the same field (including remote wells) from an installation and/or from a MODU or well intervention vessel. Where there is more than one installation serving the field and if the well suspension / abandonment operations are to be undertaken from each installation serving that field then a separate WIA will be required for each installation.

The period of validity of well suspension or abandonment CP will either be related to the duration of the proposed operations, or will be valid to cover a number of operations during a single calendar year. In both cases, where any chemical use and/or discharge has not been included in the original application and permit, it is possible to apply for a variation to the CP, but the application must be made in advance of the proposed additional chemical use and/or discharge. It is also possible to apply for a variation to extend the duration of a CP relating to a specific operation, providing the application is made before the current date of expiry. However, an "annual" permit covering multiple suspension or abandonment operations will always expire on 31 December of the relevant calendar year. The 'annual' permit is not required to be valid from the 1 January unless operations are to be undertaken from that date and therefore can be applied for anytime during the calendar year.

Where the suspension or abandonment operations relate to a well that is already the subject of a drilling CP, and that permit has not expired, the suspension or abandonment operations can be added to that permit by submitting a variation to the CP of the Drilling Operation (DRA) MAT, instead of applying for the CP using the WIA, but the application must be made in advance of the proposed chemical use and/or discharge. Similarly, where the suspension or abandonment operations relate to a well that is already the subject of an intervention / work-over CP, and that permit has not expired, the suspension or abandonment operations can be added to that permit by submitting a variation to the existing CP of the WIA, but the application must be made in advance of the proposed chemical use and/or discharge.

All wells where well suspension or abandonment operations are to be undertaken as part of the campaign should be identified in the WIA MAT. Where any wells at the same geographical location have not been included in the original application, it is possible to apply for a variation to the CP to include the wells, but the application must be made in advance of the proposed well suspension / abandonment operations being undertaken at the additional wells.

All MODUs / well intervention vessels used for undertaking suspension or abandonment operations should be identified in the WIA MAT. Where any MODUs / well intervention vessels have not been included in the original application, it is possible to apply for a variation to the CP to include the MODU/well intervention vessel, but the application must be made in advance of the proposed well suspension / abandonment operations being undertaken from the MODUs / well intervention vessels.

Irrespective of the method of application for a well suspension or abandonment CP, it will still be necessary to complete a PON5 Part 2 to support the application for a Petroleum Act suspension or abandonment consent. However, the PON5 Part 2 will be amended to avoid duplicating any information that will be included in the relevant CP application.