

ENVIRONMENTAL ALERT

ALERT NUMBER: 01/2010

ISSUE DATE: 05/01/10

ALERT DETAILS:

Recent reviews of Oil Pollution Emergency Plans (OPEP) by Operators and DECC has established some instances where pipelines and sub-sea infrastructure have not been included in the scope of an appropriate OPEP. Instances include shared and third party pipelines and infrastructure where roles and responsibilities for response and counter pollution were unknown/unclear. Potential exists for response and counter pollution operations to be hindered or delayed in the event of an incident.

ADVISED ACTION

Operators are advised to review their applicable offshore infrastructure including installations, pipelines and sub-sea tiebacks to ensure that they are all included within the scope of an appropriate OPEP. Where roles and responsibilities for any infrastructure differ from that detailed within the OPEP i.e. 3rd party pipelines/infrastructure, these must be clearly established, identified and documented.

The following provides an extract from current DECC Guidance Notes to Operators of UK Offshore Oil and Gas Installations (including pipelines) on Oil Pollution Emergency Plan Requirements but operators should refer to full guidance for all associated requirements including how to make any updates/variations to existing OPEPs:

OPEP 3rd PARTY/PIPELINE REQUIREMENTS:

Section 3.1.1. of the Guidance Notes to Operators of UK Offshore Oil and Gas Installations (including pipelines) on Oil Pollution Emergency Plan Requirements, states that “**Pipelines engaged in the transportation of oil, condensate, wet gas, or gas must be covered by an OPEP.**”

For subsea tiebacks where the operator of the subsea facility differs from that of the host installation, the responsibilities in terms of oil pollution incident reporting and response must be clearly defined and agreed between the operators and DECC. Section 3.1.5 of the Guidance Notes to Operators of UK Offshore Oil and Gas Installations (including pipelines) on Oil Pollution Emergency Plan Requirements, states that. “**Where the operator of the host installation takes responsibility for reporting and/or response, the existing OPEP for the installation must include the tieback. Where the operator of the subsea facility takes responsibility, a new OPEP will be developed and the host installation OPEP must be updated to include these changes.**”

Further Information

Any queries relating to this alert should be addressed to:

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