



Offshore Petroleum Regulator for Environment & Decommissioning

OPEP Guidance – Revision 6 Supporting Document – Summary of Changes

This document is designed to support the issue of Revision 6 of the OPRED OPEP Guidance.

It is not intended to be referenced in isolation and is not considered to form part of the OPEP Guidance. Readers should refer to this document in conjunction with Revision 6 of the OPEP Guidance as its purpose is to highlight the key content and significant changes within the amended guidance and provide additional clarification where deemed necessary. This document also describes the timeframes for Responsible Persons to take account of Revision 6 of the Guidance in both new and existing approved OPEPs.

The key content and associated changes in Revision 6 of the OPEP Guidance are as follows:

Section 4.7 – Variations to OPEPs

Key Content: The Department no longer differentiates between major and minor changes for all required changes to OPEPs, Communications & Interface Plans (CIPs) and for the initial submission of a new CIP.

The functionality to make any change to an OPEP, CIP or submit an initial CIP in the Competent Authority Portal (CAP) has been updated and a single 'variation' function has replaced the previous major & minor change options.

Revision 6 of the OPEP Guidance details the required timescale for all OPEP variation submissions and the processes for making an OPEP variation submission in the Competent Authority Portal (CAP)

Change: OPEP Guidance now aligns with CAP OPEP variation process.

Appendix A.1 – OPEP Types – Decommissioning

Key Content: The guidance details that OPEPs are required to remain in place during decommissioning activities where there is a risk of an oil pollution incident. If there is no longer any risk of an oil pollution incident from the installation being decommissioned there is no requirement for an OPEP to be in place.

Change: The Guidance clarifies that in the circumstances where an accepted Safety Case remains in place during decommissioning activities but there is no longer any risk of an oil pollution incident there is no requirement for an OPEP to form part of the Internal Emergency Response Plan and the OPEP can be withdrawn.

Appendix A.5 – OPEP Requirements – Section 29 - Emergency Contact Details

Key Content: The guidance states the onshore and offshore emergency contact details that must be provided for the Responsible Person.

Change: The Guidance clarifies that the OPEP must include permanently manned 24hr contact telephone numbers for all relevant offshore installations and for the relevant onshore emergency response team (duty manager etc).



Appendix B – Modelling Guidance

Key Content: The guidance specifies the categories of worst case oil release scenarios which must be modelled and the required modelling inputs. In relation to the categories of worst case oil release scenarios that must be considered for modelling there are no changes to:

- the requirements for the modelling of Reservoir Fluids. Applicable OPEPs must continue to include ongoing oil release modelling of the worst case well oil release scenario; and
- the requirements for the modelling of oil inventories in Major Trunk Pipelines. Applicable OPEPs must continue to include instantaneous release modelling of the Major Trunk Pipeline inventory from three locations: installation, mid-point and near-shore (15km from coast).

Changes:

1. The other modelling categories that must be considered by all Responsible Persons for instantaneous oil release scenarios have been updated. New categories for *Stored Crude Inventory* and *Operations within 40km of the coast* have been included.

Stored Crude Inventory: On installations which store crude oil prior to offload/export modelling is to be provided for the maximum possible stored crude oil inventory on-board an FPSO or FSU or the maximum possible stored crude inventory in any connected subsea storage facility or vessel only. These scenarios should be modelled as an instantaneous release.

Operations within 40km of the coast: Where the installation or in-field pipeline is within a block wholly or partly within 40 km of the coast the largest of the following inventories should also be modelled (this in addition to any required Reservoir Fluids and Stored Crude Inventory modelling):

- maximum possible oil inventory of any in-field pipeline (modelled from the point closest to the shore)
- maximum possible diesel inventory on-board the installation, MODU or vessel (whichever is greatest)

These scenarios should be modelled as an instantaneous releases. Responsible Persons should note:

- modelling of a smaller volume of pipeline inventory is acceptable if appropriate justification is provided to show that it would be worst case; and
- there is no requirement to model the in field pipeline or diesel inventories if a model has already been completed as per the required Stored Crude Inventory for a larger hydrocarbon inventory.



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This means that the Department no longer requires instantaneous release modelling (such as would have previously been carried out for worst case diesel/pipeline inventory) unless the installation stores crude oil (FPSO, FSU or Connected subsea storage tanks) or is within a block within 40km of the coast.

2. The Guidance clarifies that in the circumstances when there is a reduction in the significance of any modelled worst case remodelling is not required until the next 5 year review of the OPEP. At the next 5 year review the model(s) should be updated to reflect the reduced worst case or a justification provided in the OPEP to demonstrate why the previous modelling remains suitable.
3. The Guidance clarifies that the duration of the modelled period must be appropriate to the oil release scenario. The duration of the release period must be justifiable and should consider any discrepancy between the duration of the modelling and the identified time period required to stop the release. The minimum 10 day modelling duration for certain oil release scenarios has been removed.

Appendix C.2 – Offshore OPEP exercises

Key Content: The Guidance details the General Requirements for Offshore OPEP exercises.

Changes: The Guidance clarifies that it is acceptable for:

- ‘Offshore’ OPEP exercises for Normally Unmanned Installations to be undertaken onshore; and
- Offshore OPEP exercises for Non-Production Installation (NPI) operations to be undertaken onshore prior to NPI mobilisation.

Appendix C.2 – Tier 3 exercises

Key Content: The Guidance details the General Requirements for Onshore OPEP exercises.

Change: The Guidance has been amended to reflect that the Department now refers to ‘SOSREP exercises’ as ‘Tier 3 exercises’.

Appendix D – Oil Spill Reporting arrangements

Key Content: The guidance details the circumstances and timeframes for required PON1 and telephone notifications.

Changes: The Guidance has been aligned to the updated PON1 Guidance. This means that the circumstances when telephone notifications to OPRED and HM Coastguard are required in the specified oil release scenarios/locations has been updated. Telephone notifications to both organisations are now the same with the exception that HM Coastguard require a telephone notification for the first report of *all* ongoing releases whereas OPRED require telephone notification only when an ongoing release cumulatively exceeds one tonne for the first time. Note, there is no longer a requirement to make telephone notification to the Coastguard of all PON1 submissions.



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In addition:

- the circumstances when a telephone notification to Marine Scotland is required has been aligned with the existing telephone notification requirements for the Joint Nature Conservation Committee; and
- the circumstances when applicable PON1/telephone notifications to Marine Scotland and the Marine Management Organisation are to be provided based on the location of the release have been clarified and aligned to PON1/Integrated Reporting Service requirements.

Appendix F – Dispersant use and approval

Key Content: The Guidance contains the Form F.1 which specifies the information required when a Responsible Person is seeking advice or prior approval on dispersant use.

Changes: The information required by virtue of Form F.1 has been updated. Amongst other changes the Form F.1 has been updated to require:

- a summary of the outputs from the decision making process utilised to determine why the proposed use of dispersants is an appropriate response to the oil pollution incident. This summary must demonstrate why the use of dispersant will significantly reduce the impact of the oil pollution incident and result in the least environmental harm (This may be the relevant output of a NEBA/SIMA analysis or by any other equally effective means);
- details of the environmental sensitivities in the proposed area(s) of dispersant application that may be impacted by the use of dispersant and the nature of these impacts; and
- details of the environmental sensitivities in the area(s) that may be impacted by the oil pollution incident based on actual modelling if dispersant were not utilised

New OPEP submissions and updates to approved OPEPs

New OPEP submissions

Any new OPEP/TOOPEP submissions made after the publication of Revision 6 of OPEP Guidance must reflect all requirements of this version of the Guidance.

Approved OPEPs

Any OPEP/TOOPEP variation application (including the submission of a CIP) or 5-year OPEP review undertaken after the publication of Revision 6 of OPEP Guidance must ensure the variation submission/5 year review reflects all requirements of revision 6 of the Guidance. Notes - this means that:

- any new CIP submission (or variation to an existing CIP) will require the Responsible Person(s) to update the interfacing OPEPs (NPI OPEP and Offshore OPEP/Consolidated OPEP and/or Onshore OPEP as required) to meet the requirements of Revision 6 of the Guidance.
- any required variation to an offshore OPEP/TOOPEP may require the associated onshore OPEP to be updated.

Any approved OPEPs that have not already been updated to meet the requirements of Revision 6 of the Guidance must be updated by way of a variation application within 2 years of publication of this version of the updated Guidance. This means that all OPEPs should be approved to the standard of Revision 6 of the Guidance by October 2023 (as variation applications must be made by September 2023). Responsible Persons should discuss any proposed schedule to update approved



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OPEPs to reflect the requirements of Revision 6 outside of any other required variation/5 year review submissions with their focal point OPRED offshore environmental inspector.