

# New Regulations:

Commonwealth Offshore Petroleum and Greenhouse Gas Storage

(Resource Management and Administration) Regulations 2011

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<http://www.nopsema.gov.au/legislation-and-regulations/>

## Performance-Based (Goal Setting) Regime.

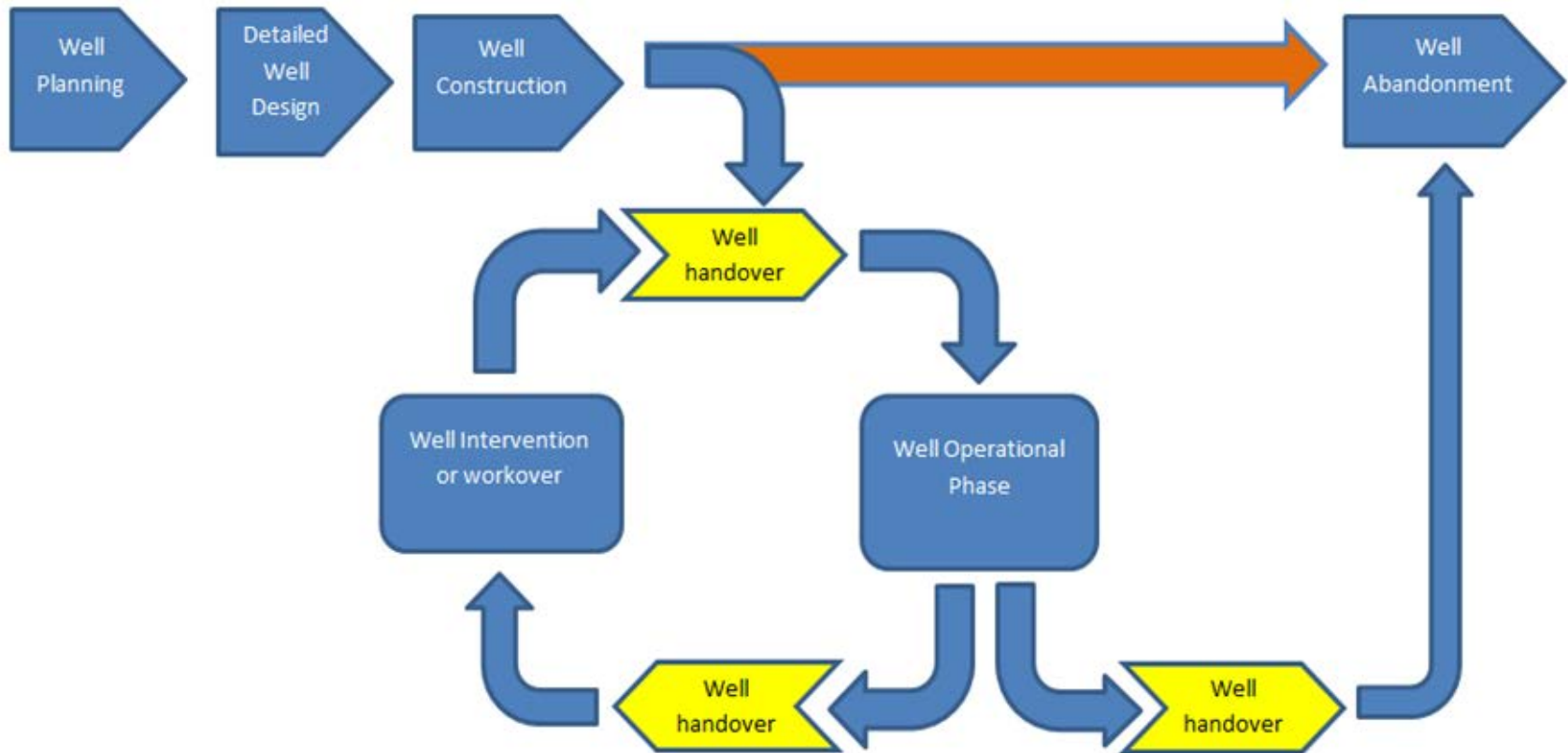
The role of the regulator in a performance based regime is to provide independent assurance that the risks are properly controlled by challenging the titleholders risk management arrangements during WOMP assessment and then verifying by planned inspection that the titleholder has implemented its risk management commitments as documented in the WOMP.

The legislation sets out objectives that must be achieved, but allows flexibility in the choice of standards, methods or equipment that may be used by companies to meet their statutory obligations.

The onus is on the titleholder to demonstrate that whatever provision (procedure, standard, system or hardware) is in place meets with the goal defined within the regulations.

Old regulations	New regulations
WOMP	WOMP
AAUWA	WAN (Well Activity Notification) - 21 day and any time
	End of well abandonment report
Notification reportable incident	

- The existence of a well that is not operational constitutes the undertaking of a well activity - until abandonment.
- **Suspension and abandonment.**
- **Contractors and service providers** are aware of their responsibilities and have appropriate competencies and training.
- **Blowout** contingency planning.



Provides guidance on the content and level of detail expected to be included in relation to each of the major aspects of a WOMP submission (Management System Description, Design & Well Activity Description, Risk Assessment, Objectives, Control Measures & Performance Standards) such that it complies with the requirements of the new regulations and provides evidence that risks are reduced to a level that is ALARP.

“Have I included sufficient detail in the description of the well, and the well activities relating to the well to which the plan applies?”



Titleholders should be mindful that the WOMP is a ‘permissioning document’ and statements made within the document should be clear and unambiguous as these become legally binding commitments that the titleholder must meet once the WOMP is accepted by NOPSEMA and is “in force”.

The WOMP must be a standalone document that is sufficient to meet the contents and level of detail requirements of the *new regulations* without need for NOPSEMA to refer to other documents external to the WOMP.

In order to supply *descriptions* of elements in the WOMP, as opposed to copies of source documents themselves, the description of an element should:

- Distil the points of value, the relevant features of the element;
- Outline the reasoning or the background thinking to the development of the element;
- Explain how it is connected to, or supports, other elements.

## Too much detail

Submitting copies of complete reference documents within the WOMP may not necessarily provide evidence that it complies with the regulatory requirements of the new regulations common examples of this are the inclusion of:

- A complete well abandonment and suspension guideline containing multiple options without specifying the circumstances in which each option might be used;
- A complete copy of a titleholder – drilling contractor well control interface document.

## Insufficient detail

Simply listing elements or referencing documents (roadmap) will not provide a sufficient level of detail.

Examples of this include:

- Details in relation to well abandonment being limited to a reference to an internal guideline or policy;
- Specifying casing or tubing design safety factors without outlining the load cases that will be considered;
- Reference to a competency system without outlining job titles and responsibilities.

The WOMP should have a coherent

- Integrated structure.
- Logical flow to the process that outlines: measures to control the risks, and the performance required from specific measures to maintain well integrity risk levels to ALARP.
- The use of good editorial practice is essential: duplication of information (and the potential for contradiction) can be avoided by using effective internal cross-referencing within the WOMP document itself.

# WOMP content requirements

## Regulation 5.09(1)

- a. Describe the well and activities
- b. Describe the risk management process
- c. Describe and explain: Design, Construction, Operations & Management of Well
- d. Describe the Performance Outcomes
- e. Describe the control measures to ensure the integrity of the well to ALARP (providing the risk assessment)
- f. Describe the Performance Standards for the Control Measures
- g. Describe the Measurement Criteria to determine: Performance Outcomes and Performance Standards
- h. Describe the monitoring, audit and well integrity assurance processes throughout the life of the well

- i. **Suspension and Abandonment:** Describe the arrangements that will be in place to ensure the suspension and abandonment risk to well integrity is ALARP
- j. **Contractors and Service Providers:** Describe the measures to ensure that the contractors and service providers are aware of their responsibilities and have the appropriate competencies and training
- k. **Blowout Contingency Planning:** Describe the measures and arrangements to regain control of a well after a blowout
- l. A timetable for carrying out and completing the well activities to which the plan applies



The titleholder should consider the nature of internal MoC and versus the trigger for a WOMP revision.

Example:

The level of risk has a direct association with the seniority of the titleholders MoC approval process, therefore the titleholder should use this as an indicator to trigger a revision.

Regulation 5.05 provides for the titleholder to undertake activities not covered in the WOMP “in force” on an urgent basis e.g. to deal with the aftermath of an emergency.

NOPSEMA will only provide consent if it is satisfied that there will not be an occurrence of a significant new risk or a significant increase in an existing risk from the proposed work.

The request (with associated risk analysis) and consent will be in writing.

Studies that can be carried out in support of a WOMP (e.g. conductor and riser analysis, shallow seismic studies, etc.)

Titleholders should not include copies of these analyses, but should provide a summary description of the analyses, the type and when they will be (or have been) carried out.

# Example: Objective, control measures & performance standards

Description	Objective	Control measures	Performance standards
Production casing cementing after installation.	To isolate a permeable formation between the proposed casing shoe and the previous casing shoe.	<p>Cement slurry &amp; spacer design and pumping schedule &amp; excesses. Plug bumped as per planned schedule and no back flow.</p> <p>Defined contingency planning.</p>	<p>Plug bumped and pressure tested as per defined standard. Top of cement and / or cement job quality verified by CBL / Radial log and a successful LOT / FIT as per defined standard.</p>

# Advance notification of well activities



- Notifications do not require NOPSEMA's approval.
- The onus is on the titleholder to ensure that the activity will be conducted as per the WOMP in force.
- A single notice may encompass continuous activities for a single well or batching activities.
- NOPSEMA may ask questions about the activity, this will not prevent the titleholder from commencing the activity.
- If when the activity commences any risk has significantly increased the WOMP should be revised.

## *Form of notice*

Notice of a well activity must be in writing and must include the following information relating to the well activity:

- (a) a reference that identifies the well operations management plan for the well;
- (b) a description of the well, including the proposed or existing well name and number, the location of the well and the water depth;
- (c) the name of the facility from which the well activity will be carried out;
- (d) the name of the operator of the facility;
- (e) a description of the well activity, including the objective, key elements, milestones and programmed depths (e.g. well montage);
- (f) a list of any documents that have been prepared for the management, control or operation of the particular well activity (note: no submission of the actual document is required);
- (g) the timetable for carrying out and completing the activity.

## Activities requiring 21 days' notice

- Drilling and completions operations
- Workovers utilising a rig or workover unit
- Removal of Christmas tree (XT), wellheads and associated barriers
- Well testing
- Plug and abandonment operations



## Activities requiring advance notice

- Perforating and tubing punch operations and associated work through XT without a rig or workover unit
- Installation, removal or lock open of SSSV's, gas lift or injection valves, through XT without a rig or workover unit
- Installation of XT saver for use during maintenance work on XT components

Standalone activities that do not require notice before starting the activity

- Slickline investigation work e.g. LIB, gauge run etc.
- Slickline operations e.g. bailer runs, wireline fishing operations, running wireline isolation plugs in tubing and tubing nipples
- Through tubing E-line logging operations e.g. investigative logs, spinner production logging, etc.
- Through tubing stimulation e.g. acid wash
- Pressure testing of well barrier elements e.g. tubing, annuli, packers, wellhead and XT components

# Incidents report and records

## Notifying reportable incidents

Verbal notification: **NOPSEMA incident phone number (08) 6461 7090** - Option 4.

Written report within 3 days to:

[submissions@nypsema.gov.au](mailto:submissions@nypsema.gov.au)

or via secure file transfer at:

<https://securefile.nypsema.gov.au/filedrop/submissions>

# What is required to be reported?

What type of incident is being reported?		Please tick appropriate incident type	
<i>Please tick all applicable (one or more categories)</i>		<i>To use electronically: MS Word 2007-10 – click in check box</i>	
<b>Categories</b> <i>Please select one or more</i>	Loss of integrity of the well resulting in the release of:	Loss of integrity release >1 kg (gas) Loss of integrity >80 L (liquid)	<input checked="" type="checkbox"/> <input type="checkbox"/>
	A failure of hydrostatic pressure as a primary barrier, leading to:	A build-up of pressure or a positive flow check and the operations of the BOP  Flow from a well has been diverted	<input type="checkbox"/> <input type="checkbox"/>
	Damage to or failure of well-equipment has or could lead to a loss of well integrity, then such equipment would generally be pressure containing equipment relating to the barrier envelope of a well at its various stages of construction, operation etc.	Failure of well-related equipment  Damage to well-related equipment	<input type="checkbox"/> <input type="checkbox"/>
	Any other unplanned occurrence that requires the titleholder to implement measures or arrangements to regain control of the well	Any other unplanned occurrence	<input type="checkbox"/>

General information			
1	<b>Where did the incident occur?</b>	Facility / field / title name	
		Site name and location <i>Latitude/longitude</i>	
2	<b>Who is the registered titleholder?</b>	Name	
		Business address	
		Business phone no.	
3	<b>When did the incident occur?</b>	Time and time zone	
		Date	
4	<b>What is the WOMP relating to the title?</b>	Number	
5	<b>Details of person submitting this information</b>	Name	
		Position	
		Email	
		Telephone no.	
6	<b>Brief description of incident</b>		

A verbal notification must be given to NOPSEMA as soon as practicable and must contain:

- All material facts and circumstances concerning the reportable incident that the titleholder knows or is able, by reasonable search and enquiry, to find out.
- Any action taken, or proposed to be taken, to stop, control or remedy the reportable incident.

Regulation	Report content requirement	Regulation 5.26A(3)(a)	Regulation 5.26A(3)(a)(iii)
5.26A(3)(b)(i)	All material facts and circumstances concerning the reportable incident that the titleholder knows or is able, by reasonable search or enquiry, to find out.		
5.26A(3)(b)(ii)	Any action taken to, or proposed to be taken, to stop, control or remedy the reportable incident.		
5.26A(3)(b)(iii)	Any other action taken or proposed to be taken, to prevent a similar incident occurring in the future.		



# Instructions and general guidance for use

This form should be used in conjunction with NOPSEMA Wells Regulations Guidance Note available on the NOPSEMA website:

N-03000-GN1636 Notifying reportable incidents

# End of WOMP

## **WOMP ends when well permanently abandoned**

The operation of a WOMP ends when:

- The titleholder has permanently abandoned the well(s) to which the WOMP applies; and
- The titleholder has given NOPSEMA a written report of the abandonment; and
- NOPSEMA notifies the titleholder that NOPSEMA is reasonably satisfied that the process of abandoning the well(s) has been undertaken in accordance with the WOMP.

The report(s) should include a final abandonment schematic and a diagram detailing the full well barrier envelope and should detail:

- The primary, secondary and any additional barriers;
- How each barrier was set, providing actual depths of formation tops, casing shoes, tops of cement and depths of permeable zones known; and
- Verification methods used to assure the integrity for the barriers set (e.g. internal cement plugs) and for those previously in place (e.g. production casing cement verification).

# Transition provisions

- An existing old WOMP will continue to be in force after 1 January 2016 until 31 December 2017 (until revised under the new regulations).
- An old WOMP in force: the titleholder is required to undertake the relevant well activities in accordance with the regulations prior to 1 January 2016. AAUWAs should continue to be submitted until new WOMP is accepted.
- Old WOMPS are subject to: incident, report and records under the new regulation.

New regulations deems that a well that is not in operation (suspended well) is a well activity.

- A suspended well in a title without a WOMP has one year to have a WOMP accepted.
- A suspended well within a title covered by an old WOMP has a two year period for acceptance.

An old WOMP may be revised at any time before the end of the transition period but must be revised if triggered by any of the circumstances specified by new regulations:

- Revision based on circumstances
- Revision required by NOPSEMA
- Revision at end of each 5 year period.

If an old WOMP has not been revised and accepted before the last day of the transition period (31 December 2017), the old WOMP will cease to be in force.

NOPSEMA recommends that titleholders transition old WOMPs in good time with respect to their proposed activity schedules.



For more information regarding this guidance note, contact the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA):

- Telephone: +61 (0)8 6188 8700;  
or
- Email: [wompguidance@nopsema.gov.au](mailto:wompguidance@nopsema.gov.au)

# Questions?