Simultaneous Operations (SimOps)

Purpose
This section describes requirements for conducting simultaneous operations (SimOps) at Gulf of Mexico Region locations. For subsea operations refer to Section D, Chapter 26.2.

Scope
The plan for conducting SimOps provides instructions for implementing drilling, P&A, completion, workover, wireline, coiled tubing, snubbing, and construction or production activities simultaneously at offshore facilities. The purpose of this plan is to provide for the safety of personnel and protection of equipment and the environment.

SimOps will be coordinated through joint planning efforts by production, workover/completion, drilling, and construction supervisors and/or engineers who plan and direct activities.

This plan will be used as a minimum. Supplemental plans may be prepared for site-specific operations and may include a description of the operations to be conducted, special precautions that will be required, etc.

Responsibilities
The Person in Charge (PIC) or Lead Operator is responsible for:
- Overseeing activities related to the production operations activities on the facility.
- Overall safety on the facility including when simultaneous operations are being conducted.

The Consultant is responsible for:
- Overseeing on-site activities, safety, and technical matters related to drilling, completion, re-completion, workover, P&A or construction operations on the platform.

The PIC and the Consultant are responsible for planning a safe Simultaneous Operation, following Apache’s Safe Work Practices (safety meetings, JSA, hot work permit, etc.), and execution of Platform Simultaneous Operations Agreement when applicable.

The PIC and the Consultant will communicate with responsible personnel from the various operations at the beginning of each shift and at other times during the operation, as conditions require, to discuss the expected activities and to resolve any conflicts due to SimOps. The PIC and the Consultant will inform all involved parties of any special problems that might be encountered and the appropriate actions to take if such problems should occur.

All personnel have the responsibility and authority to shut the operation down (STOP WORK AUTHORITY) if something is observed to be unsafe.
General Requirements

The following guidelines establish procedures for SimOps planning, coordination and outlining safety rules to ensure that SimOps are conducted without an incident:

- Before SimOps are commenced, a survey of the facility will be conducted by the PIC and Consultant to:
  - Identify any potential hazards
  - Determine safe placement of required equipment
  - Verify adequate egress routes remain following equipment placement
  - Determine whether any production related equipment is required to be shut in

- Proper communication will be established between personnel involved in the overall direction of operations. A communications system, such as intercom, Gaitronics, or radios, will be set up to facilitate communication.

- A common daily POB (personnel on board) roster will be maintained by the PIC for all personnel on location.

- Fire and abandonment drills will be conducted prior to the commencement of SimOps and weekly thereafter. The Emergency Evacuation Plan (EEP) will be reviewed.

- JSAs (Section B Chapter 2 Part A) and safety meetings (Section B Chapter 2 Part C) will be conducted as per Apache’s Safe Work Practices.

- Emergency shutdown (ESD) systems and alarms will be explained to all involved groups. All personnel will understand the operation of the ESD system. This system will be in service at all times and tested in accordance with BSEE regulations.

- Simultaneous Operations being conducted while the facility is producing will have a production operator on duty.

- The regulation at 30 CFR 250.406(b) requires you to shut in all producible wells located in the affected wellbay below the surface and at the wellhead when you: (1) move a drilling rig or related equipment on or off a platform, (2) move or skid a drilling unit between wells on a platform, or (3) move a mobile offshore drilling unit (MODU) within 500 feet of a platform. (Consult with project engineer for approved BSEE permit details)
The regulations at 30 CFR 250.502 and 250.602 requires all wells in the same well-bay, which are capable of producing hydrocarbons, to be shut in below the surface with a pump-through-type tubing plug, and at the surface with a closed master valve prior to moving well-completion and well-workover rigs and related equipment, unless otherwise approved by the BSEE District Manager. (Consult with project engineer for approved BSEE permit details)