Simultaneous Operations (SIMOP)

**Purpose:** The purpose of this plan is to establish safety procedures to be implemented during the performance of operations including subsea well testing from a drilling rig, drilling and completion on subsea wells while producing from others utilizing the same pipeline and umbilical control system.

**Scope**

This safe work practice covers Apache facilities and operations in the Gulf of Mexico.

**General**

A simultaneous operations plan (SIMOP) that meets applicable BSEE regulations and conforms with this safe work practice will be developed on a case-by-case basis.

1. The Apache Well Site Supervisor will be in charge of the simultaneous operation. He will ensure that activities are coordinated in accordance with the simultaneous operations plan (SIMOP). He will also coordinate with the Drilling rig OIM to assure that the SIMOP does not conflict with normal safety procedures on the rig. A subsea layout drawing at scale 1:2000 shall be displayed at a location(s) accessible to personnel involved in the SIMOP.

2. The Well Site Supervisor (or his designee) will communicate directly with the Person-in-Charge of the host platform concerning all aspects of the simultaneous operation. He will verify contact information with the platform and obtain the names of operators who will have responsibility for the communications aspects of the SIMOP over the duration of rig operations. He will also obtain feedback from platform personnel concerning any platform limitations or operational items that could affect the rig or the simultaneous operations planned.

3. Personnel involved in the simultaneous operation will familiarize themselves with the communication plan (see item No. 7) to be implemented during simultaneous operations.

4. As soon as the drilling rig approaches the location to commence anchor placement or to establish dynamic positioning, the communication plan must be exercised and the safety shutdown system function tested to ensure that the existing subsea production can be shut in.

5. In order to minimize shut-in time a may be developed to handle anchors and run the stack in safe zones away from the subsea well location(s). The producing well(s) will be shut in when moving the rig over the well to be worked on or tested in ordere to latch the stack, and when unlatching for demobilization.
6. The Well Site Supervisor and the host platform operator shall develop a checklist for shut-in of the subsea well(s) that includes, but is not limited to the following:

a) Moving the rig on location to latch or unlatch the stack;
b) Loss of communications between the drilling rig and the host platform;
c) Upset condition or emergency situation on the drilling rig;
d) Upset condition or emergency situation on the host platform; and

e) Any other condition that poses a risk to rig personnel or damage to subsea infrastructure.

7. Communications Plan

a) Communications and Actions During Normal Operations

Communications between the rig and the host platform will be established and monitored in real-time via dedicated telephone lines. Continuous monitoring of these lines will be done with personnel dedicated to this task and in the host control room. These communications will be tested every “tower change” on the rig and shift change on the host facility and documented on both the rig report and the daily activities log on the host facility. Should communications be lost on either end for more than 20 minutes, the host control room will immediately ESD the producing well(s).

b) Communications and Actions in the Event of a Dropped Object or Upset

Communications between the rig and the host platform will be established and continuously monitored in real-time as described above for normal operations. In the event of a platform upset or condition the platform operator will take appropriate action in accordance the BSEE-approved valve closure requirements of the subsea project Operations Plan and will advise the rig on well status. If an ESD condition develops on the rig, the host platform operator will be immediately notified in order that the platform operator can ESD the producing well(s). In the event of a dropped object from the rig or other upset condition with potential to damage the subsea infrastructure or cause a hazard to rig personnel the rig will notify the platform to shut in the producing well(s) immediately via closure of the underwater safety valve (USV).

Additional Provisions

1. All personnel involved in the simultaneous operation will familiarize themselves with the safety shutdown system that controls operations during the subsea wellwork.

2. An ESD station must be installed near the driller’s console. The safety shutdown system must be function tested prior to commencing simultaneous operations.

3. The rig’s BOP stack control shall be capable of operation from a remote location that is not likely to be affected in the event of an uncontrolled release of hydrocarbons.
4. The Well Site Supervisor and drilling rig OIM shall ensure that emergency procedures are in place to immediately clear the rig floor and evacuate personnel to safe locations in the event of an uncontrolled release of natural gas or combustible fluids. These procedures should include a simplified checklist for immediate shutdown of rig operations and isolation of ignition sources in the event of an uncontrolled release of hydrocarbons. The checklist must be posted on the rig floor and other appropriate locations.

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

6. Initially, and regularly during the work and prior to engaging in special activities, a safety meeting shall be conducted to explain the planned operation, any potential risks or hazards, and measures to mitigate these. All platform operator(s) shall be included in the meeting. These meetings shall be documented (see Sect. C, Chapter 3, Part D).

7. JSAs (Sect. B, Chapter 3 Part A) will be conducted as per Apache’s Gulf of Mexico Safe Work Practices, or equivalent.

8. A “Safe Work Permit” shall be issued for activities that pose additional risks to personnel or equipment (e.g., welding/burning outside safe welding area, well testing). In no case shall a permit cover more than a 24 hour period, and must be re-issued if the work cannot be completed in that timeframe.

Safety Equipment:

The Well Site Supervisor and drilling rig OIM will conduct a review of safety equipment on the rig to ensure firefighting equipment is located as required and functional, and that ESD stations are strategically located and readily accessible.

Operations Requiring Shut-in of Well Flow to the Rig:

1. Welding and hot work of any kind. (All welding will be performed in accordance with Drilling Contractor's hot work/welding policy, and a permit to work obtained).

2. Rigging up or rigging down BOP equipment.

3. Rigging up or rigging down test equipment or making lifts over rig test equipment that is under pressure.
Operations Requiring Shut-in of the Well Flow to the Platform:

1. Any production upset that requires a production shut-in.

2. Dropped object from the rig in the vicinity of the subsea well(s) or infrastructure

3. Emergency condition on the rig with potential for affecting the subsea well(s) or infrastructure.