

International Association of Drilling Contractors

Health, Safety and Environment Case Guidelines for Mobile Offshore Drilling Units

Issue 3.6 1 January 2015

ISBN: 978-0-9864401-8-2

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Document Review Status

Issue	Review Status	Date
01	First formal issue following receipt of NSOAF Acknowledgement	February 2003
02	Legislative Updates for Denmark, The Netherlands and Norway; Change of Norwegian Regulator from NPD to PSA; Enhancement of referencing between the ISM Code and this document; Additions to Section 3.3.3 (BOP Control System and API 16D)	30 June 2004
3.1	First Global Issue – Complete document update of all parts and appendices. Draft issued for consultation and comment	6 March 2006
3.2	Formal issue of Global version, incorporating comments and suggestions made by all stakeholders.	3 October 2006
3.2.1	Administrative update	1 May 2009
3.3	 Amended: Section 2.2.1.1, and 2.2.3.4 revised text regarding preparation of bridging documents to emphasize cooperative development with the client and other stakeholders. Section 2.2.1.1, added Note regarding bridging arrangements and Management of Change. Section 3.0, added "Deepwater Wells". Section 3.3, added "Details of arrangements for Deepwater Wells". Section 3.6, added "Confirmation that these routes have been assessed for the effects of fire and blast." Section 4.9.4, added "creation of bridging documents" as a potential source of information for feedback. Section 5.1, added note emphasizing the need to address Emergency Response arrangements 	1 December 2010

in bridging documents and the need to assure continuity of Emergency Response arrangements when a MODU comes off contract. • Section 5.3.2, added note to address the need to address participation in drills and exercises by client and third-party personnel in bridging documents if not address in the management system. Section 6.5, added note to address verification of HSE Critical items in bridging documents. Various editorial corrections. Amended: Section 1.3 added to address the design and commissioning of new facilities. Section 2.2.4.4 added note to address the need to establish arrangements to assure training provided meets standards for content and quality. Section 2.2.3.8 added to address the selection of contractors. Section 2.3.2 revised to include a more detailed description of the change management procedures. Section 2.4.5 added note to 1 November 2011 3.4 address that applicable regulatory requirements regarding audit scope are identified. Section 3.6 updated to emphasize descriptions and identifications of evacuation and escape systems. Section 4.9.4 added note to estabilish procedures for obtaining and processing relevant HSE performance information from other sources. Section 4.9.4 added note addressing the collection and consideration of information obtained during internal and

	external audits in relation to the revision of HSE Case and operating procedures. • Section 5.4.1 added requirement for emergency lighting for evacuation and escape route locations. • Section 6.3.1 added note regarding identification of applicable regulatory requirements.	
	Various editorial corrections.	
3.5	 Introduction – added paragraph re: Clients Part 1 – Editorial revisions based on updates shown in Appendix 2 Part 2 Section 2.2.1.1 – added requirement to identify the name(s) and address(es) Added Section 2.3.12.1.3 – to separate SIMOPS and Combined Operations Section 2.4.5 – add bullet for record retention Editorial revisions based on updates shown in Appendix 2 Part 3 Section 3.3.3 – Revise statement re: relevant standards to be more generally applicable Section 3.9 – Add bullet for emergency arrangements Part 4 Section 4.2.1.1 – Update Table 4.2.1.1 Editorial revisions based on updates shown in Appendix 2 Part 5 - Editorial revisions based on updates shown in 	1 January 2014

	Appendix 2 Part 6 Editorial revisions based on updates shown in Appendix 2 Appendix 1 – Website addresses confirmed and updated. Appendix 2 - Updated to reflect revised ISO Guide 73:2009 and ISO 31000:2009 definitions. Appendix 4 – Updated information for Denmark, New	
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3.6	 Added Appendix 5 - Other Coastal Area Regulations and Codes 	1 January 2015

Introduction to the IADC HSE Case Guideline

Welcome

Welcome to the International Association of Drilling Contractors (IADC) Health Safety and Environmental (HSE) Case Guideline. This Guideline has been developed by IADC members to:

- Assist in providing a demonstration to other stakeholders that their internal assurance process ensures that their management system's risk reducing controls related to the Health, Safety and Environment aspects of their operations, meets their senior management's expectations.
- Provide an HSE Case methodology specifically for Drilling Contractors that addresses
 the requirements and scope of operations related to their business activities, and that is
 aligned with, or meets, international standards.
- Assist International Regulators in reviewing Drilling Contractor's HSE Cases (when applicable) enabling Mobile Offshore Drilling Units (MODUs) to operate in different global regulatory jurisdictions.
- Assist in providing a demonstration of compliance with the International Safety Management (ISM) Code requirements of the International Maritime Organization (IMO).
- Verify compliance with applicable regulatory and contractually agreed upon HSE requirements.
- Assist in providing a demonstration to external stakeholders, where applicable, that the management system's risk reducing measures meet agreed upon stakeholder's expectations.

This guideline was developed for Drilling Contractors, and their scope of operations. Although the Guideline is not compulsory, its use is recommended as a demonstration of good industry practice for Drilling Contractors. While it is intended to provide a consistent methodology based on recognised practices and standards, Drilling Contractors should develop their HSE Case based on their organisation's methods of managing their scope of operations and business activities. By following the process outlined in this guideline, users may demonstrate a high degree of HSE management assurance. This assurance, although acceptable to demonstrate the robustness of an organisation's ability to manage HSE, may not support all requirements for certification under ISO 9001, 14001 or OSHAS 18001.

IADC trusts that Drilling Contractors will find this Guideline useful and easy to follow. If errors or inconsistencies are identified, or there are suggestions for improvement, then please submit relevant information to IADC. (See details at end of this introduction – "Guideline Updates").

Background

The global offshore oil and gas exploration and production arena is a diverse landscape of differing operating and business environments, national regulations and numerous authorities regulating offshore activities. Many Drilling Contractors find it challenging to satisfy the differing internal and external stakeholder expectations related to HSE management each time their units are moved from one geographical location to another.

Drilling Contractors, Oil and Gas Producers, and Authorities around the globe have seen the benefit of adopting and sharing a consistent harmonised approach in providing HSE Management assurance to meet various requirements.

The development of this approach and methodology has improved cooperation to

demonstrate HSE management assurance applicable to worldwide operations. This pragmatic approach and the development of a user-friendly methodology is intended to contribute to the improvement of people's understanding and application in the workplace.

Guideline Application and Status

The Guideline is intended to assist Drilling Contractors in preparing and reviewing HSE Cases that should provide themselves and relevant international authorities with the assurance that their operations will comply with requirements and be conducted within tolerable limits of safe operations.

The Guideline seeks to identify and address specific Coastal State regulatory requirements. While the Guidelines seek to offer advice on good practices and regulatory compliance, they are not an authoritative interpretation of each Coastal State's regulatory requirements. Where questions of regulatory requirements are identified, the Drilling Contractor must confirm their application with the relevant Regulator.

The Guideline has been developed to address the requirements of the:

- European Extractive Industries Directive (EID) 92/91/EEC as incorporated into Danish, Dutch and German legislation and detailed in Appendix 4.
- European Framework Directive (FD) 89/391/EEC as incorporated into Danish, Dutch and German legislation and detailed in Appendix 4.
- UK & Norwegian regulatory requirements which, while being very similar to the EID requirements, have been derived from separate backgrounds and are also detailed in Appendix 4.
- Australian regulatory requirements for Safety Cases, as detailed in Appendix 4.
- IMO's International Safety Management (ISM) Code, as detailed in Appendix 4.
- OHSAS 18001- International occupational health and safety management system, as detailed in Appendix 4.
- Directive 2013/30/EU of the European Parliament and of the Council of 12 June 2013 on Safety of Offshore Oil and Gas Operations and amending Directive 2004/35/EC specifically Annex 1, Section 3 "Information to be Submitted in a Report on Major Hazards for a Non-production Installation", as detailed in Appendix 4.
- New Zealand Health and Safety in Employment (Petroleum Exploration and Extraction) Regulations 2013 – specifically Schedule 4 "Information Required in Safety Case for Installation", as detailed in Appendix 4.

With regard to the title of the document, many coastal state regimes use a different term. For consistency this guideline is referred to as the Health, Safety and Environmental (HSE) Case Guideline to reflect the:

- Trend towards integrating the management of health, safety and environment.
- Requirements of the ISM Code and those of many Coastal State Areas which address environment in the same way as health and safety.

When developing an HSE Case based on this guideline, care should be taken to ensure that it reflects the relevant regulatory requirements and the operating culture of the coastal state / region it is being developed for. Before developing an HSE Case for a specific coastal state / region, it is recommended that Drilling Contractors consult with relevant regulatory agencies. This will ensure a common understanding of what is required and how it should be presented.

Development and Presentation

As per the Guideline, HSE Cases are not necessarily required to be presented in a standard format. However, the Guideline's structure lends itself to be adopted as a template, globally accepted among Drilling Contractors, Oil and Gas Producers, and regulators.

An HSE Case can be presented as a stand-alone document. However, with the development of technology, electronic means of presentation are available and acceptable within the Guideline.

Where electronic presentation of information is being considered, it is essential that details are discussed and agreed with external stakeholders (i.e., clients and regulators) prior to presentation.

HSE CASE SUBMISSION TO EXTERNAL STAKEHOLDERS

Coastal State Authorities

When submitting an HSE Case to an External Stakeholder, especially Coastal State Authorities, the document should always be accompanied by a covering letter containing a personal statement by the Drilling Contractors' senior management representative. The statement should clearly indicate the company's HSE values, the significance of the HSE Case as part of their overall management system process and their (individual or collective) commitment to its outcomes.

Clients

When reviewing an HSE Case with Operators or other 3rd-party companies, it is important to note that while the HSE Case is a stand-alone document for the drilling contractor, it is intended to also provide a foundation for bridging or interface documents involving all parties. These bridging arrangements should address site-specific and project-specific conditions and requirements, such as:

- Potential environmental effects resulting from loss of containment.
- Client's oil spill response planning and assessments of effectiveness.
- Well intervention and response planning capping stacks, relief wells, etc.
- Allowable persons-on-board (POB).
- Seabed limitations.
- Combined operations.

Guideline Structure and Contents

The Guideline has been developed in six parts.

- Part 1 HSE Case Introduction
- Part 2 Drilling Contractor's Management System (HSE Management)
- Part 3 MODU Description and Supporting Information
- Part 4 Risk Management
- Part 5 Emergency Response
- Part 6 Performance Monitoring
- Appendix 1 Reference Documents
- Appendix 2 Abbreviations and Definitions
- Appendix 3 Drawings & Schematics
- Appendix 4 Coastal Area Regulatory and ISM Code Indexes

Assessment and Acceptance

Each Drilling Contractor, Coastal State, and other stakeholder may have its own requirements for assessing and accepting HSE Cases. The Regulatory Indexes in these Guidelines contain information on specific regulator acceptance arrangements, which should be confirmed with the coastal state authority at the outset.

Abbreviations and Definitions

Throughout this guideline various abbreviations have been used. An explanation of these can be found in Appendix 2. Likewise, to ensure consistency in approach and understanding, IADC has adopted definitions for a number of specific terms which have been drawn from ISO standards.

Guideline Updates

Having developed the Guideline, IADC wishes to further develop and maintain it so that it remains a useful and respected source of information.

All users of the Guideline are asked to notify IADC of any errors or suggested improvements using the suggested format below.

The IADC contact details are as follows:

IADC Headquarters

10370 Richmond Avenue, Suite 760 Houston, Texas 77042 United States of America Phone: +1/713-292-1945

Fax: +1/713-292-1946 e-mail: hsecase@iadc.org

Suggested Format for Advising of Errors/Improvements:
Submitted By:
Regulatory Authority Concerned (if applicable):
Details of HSE Case Guideline Error/Improvement
Date:

Contents

Part 1	HSE Case Introduction	
Part 2	Drilling Contractor's Management System – HSE Management	
Part 3	MODU Description and Supporting Information	
Part 4	Risk Management	
Part 5	Emergency Response	
Part 6	Performance Monitoring	
Appendix 1	Reference Documents	
Appendix 2	Abbreviations, Acronyms & Definitions	
Appendix 3	Drawings & Schematics	
Go to http://www.iadc.org/iadc-hse-case-guidelines to view Appendices 4 & 5		
Appendix 4	Coastal Area Regulatory and ISM Code Indexes	
Appendix 5	Other Coastal Area Regulations and Codes	