Simultaneous Operations (SimOps)

Scope
This plan is to provide for the safety of personnel and protection of the environment and equipment. This safe work practice will describe requirements when conducting simultaneous operations.

SimOps will be coordinated through joint planning efforts by production, construction, wellwork, drilling and decommissioning/P&A 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.

Simultaneous Operations
Simultaneous Operations (SimOps) are when multiple operations or activities such as production, construction, wellwork, workover, wireline, coiled tubing, snubbing, P&A, etc. occur simultaneously at offshore facilities.

Non-Simultaneous Operations
Routine maintenance or service activities such as valve repairs, meter proving, vessel cleaning, etc. are not considered simultaneous operations.

Ultimate Work Authority (UWA) During SimOps
UAW must be identified before the operation commences and all crew members must know who has ultimate work authority for their operation or facility.

During SimOps the individual with Ultimate Work Authority (UWA) is responsible for making final decisions related to their specific activities or operations on the facility. Upon notification of imminent risk or danger that may impact another on-going activity or operation, the UWA will honor an “ALL STOP” until the risk or danger no longer exists to either operation and it is safe to resume all work. Also, the UWA will document the event and decision to resume work on the UWA Form. Refer to: Authorization to Resume Work Form located in Section A, Chapter 6, Part A, or, in the Fieldwood Job Safety Analysis (JSA) form.

Ultimate Work Authority Agreement Form
The Ultimate Work Authority Agreement Form for Simultaneous Operations is intended to ensure the person with UWA that make final decisions related to specific activities or operations on the facility are identified before the operation commences. The form documents that the Simultaneous Operations and Ultimate Work Authority Safe Work Practices have been reviewed, discussed and agreed upon prior to Simultaneous Operations beginning. The Ultimate Work Authority Agreement Form for Simultaneous Operations shall be completed when one or more of the following conditions exist:
A supervisor for Construction, Wellwork, Decommissioning/P&A or Drilling arrives on the facility to start work on a new project or operation.

The UWA on the facility and supervisor of Construction, Decommissioning/P&A, Wellwork or Drilling operations have not previously met.

Either the UWA or supervisor feels that operations in the field have changed to the extent deems it appropriate to re-orient the other party.

**General Requirements**

The following procedures are to be performed prior to beginning simultaneous operations:

- Survey of the facility conducted to identify any potential hazards
- Determine safe placement of required equipment and verify adequate egress routes
- Determine whether any production related equipment is required to be shut in
- Ensure proper communication system is 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 is established and will be maintained for all personnel on location.
- Fire and abandonment drills are conducted prior to the commencement of SimOps and weekly thereafter. The Emergency Evacuation Plan (EEP) will be reviewed.
- Job safety analysis (JSA) and safety meetings will be conducted
- Emergency shutdown (ESD) and emergency alarm system operation and locations will be communicated to all personnel. 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.

**Rig/Drilling/Workover Requirements**

The following are BSEE requirements when drilling rigs are part of simultaneous operations.

- 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 facility, (2) move or skid a drilling unit between wells on a facility, or (3) move a mobile offshore drilling unit (MODU) within 500 feet of a facility. (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)