



Examples of “Operator” issues

- **Fixed Platform**
- **FPSO 1**
- **FPSO 2**
- **Mobile Offshore Drilling Unit 1**
- **Mobile Offshore Drilling Unit 2**



Example 1 – Fixed Platform

| | Responsibilities | Relevant Criteria |
|--------------------------------|-------------------------------------------|----------------------------------------------------------------------|
| Title-holder | Operation, maintenance, staffing, control | Mgmt/ control of plant & eqpt, SMS, PTW, workforce, information, OIM |
| Third Party Contractors | Use of their own equipment & systems | Nil for smaller contractors? Workover – Part of the work ? |

Example only – consult with NOPSA on real cases



Example 2 – Owned FPSO

| | Responsibilities | Relevant Criteria |
|--------------------------------|---------------------------------------------|-------------------------------------------------------|
| Title-holder | Operation, maintenance, control, production | Plant & equipment, OIM, PTW, training, staff, systems |
| Third Party Contractors | Catering, offtake support | Control of part of a facility ? |

Example only – consult with NOPSA on real cases



Example 3 – Leased FPSO

| | Responsibilities | Relevant Criteria |
|-------------------------|-----------------------------------------|------------------------------------------------------|
| Title-holder | Control of production, client rep | Production info, choice of offtake vessels |
| Vessel Owner | Owner rep, ownership of hull | Control of plant ? |
| Operating Company | Operations, offtakes, process operators | OIM, PTW, SMS, process eqpt, cranes, systems of work |
| Third Party Contractors | Deck crew | Workforce ? |

Example only – consult with NOPSA on real cases



Example 4 – MODU

| | Responsibilities | Relevant Criteria |
|-------------------------|------------------------------------------------------------------|------------------------------------------|
| Title-holder | Logistics, well planning, weather | Control of part of a facility |
| Vessel Owner | Manning, drilling, deck ops, accommodation, local Emerg Response | OIM, PTW, systems, plant & machinery |
| Third Party Contractors | Specialist services | Control of their own equipment & systems |

Example only – consult with NOPSA on real cases



Example – MODU doing SIMOPS

| | Responsibilities | Relevant Criteria |
|-------------------------|------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| Title-holder | Control of production | |
| Platform operator | Operation of wells, Risks to pipelines & existing facilities | PTW, Snr OIM, Control of major risk items may over-ride other criteria. Competence to manage the SIMOPS aspects |
| Vessel Owner | Manning, drilling, deck ops, accommodation, local Emerg Response | OIM, systems, plant & machinery |
| Third Party Contractors | Specialist services | Control of their own equipment & systems |

Example only – consult with NOPSA on real cases

National Offshore Petroleum Safety Authority (NOPSA)



Responsibility for Accidents – Example 1

Example:- A cementer, contracted to an Oil Company, on board a MODU slips on a stair case and is seriously injured.

Who could be held responsible for this accident ?



NOPSA's approach to investigation

- What were the root causes and who could reasonably be expected to have control of them?
- Condition of the handrails & steps – Operator
- Boots covered in mud & no grip on the sole – Contractor (?)
- Required to work excessive hours by Oil Company – Oil Company (?) or is it the Operator

Systems for control of risk should be explained in the Safety Case, specific responsibilities can be (and are) written into campaign or well-specific revisions.

Remember, the operator must take all reasonably practicable steps.



Responsibility for Accidents – Example 2

Example:- A employee of a wireline logging company inadvertently drops a radioactive source which becomes lodged on the drill floor. Some of the drill crew are exposed to radiation

Who could be held responsible for this accident ?



NOPSA's approach to investigation

•What were the root causes and who could reasonably be expected to have control of them?

Was the equipment at fault – poorly maintained ?

Was the equipment at faulty- poorly designed ?

Was the service hand competent ?

Was the work environment a factor – lighting, etc ?

Did the Oil Company make an assessment of the contractor's HSE programs ?

Remember, the operator must take all reasonably practicable steps.