Environmental Regulations for Offshore Drillings: Comparing International Regulations and Recommendations for Israel

Tommer Mayraz, Adv



DRILLING OPERATIONS POTENTIAL SOURCES OF EFFECTS

ACCIDENTS

- · Oil spils
- · Chemical spills
- Gas releases
- · Dropped objects
- Collisions

WASTES RETURNED TO SHORE

- Solid wastes
- · Liquid wastes and tank washings
- Muds and cuttings

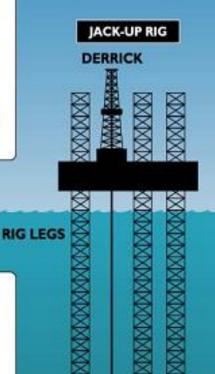


HELICOPTERS

DERRICK

ATMOSPHERIC EMISSIONS

- Combustion emissions from power generation
- · Fugitive emissions from fuel and chemical storage
- · Local exhaust ventilation emissions
- Dust from bulk loading
- · Combustion emissions if well test flaring



SUPPORT VESSELS

DISCHARGES TO SEA

- · Sediments from riserless drilling
- · Cooling water
- · Ballast water
- · Dissolution of corrosion protection and antifouling protection
- Deck drainage and washings
- . Sewage and food waste
- · Machinery space and other oily drainage
- · Muds and cuttings
- . Brines, cement returns and other drilling chemicals



RISER

ANCHORS

PONTOONS

OTHER INTERACTIONS

- Physical presence of rig and support vessels
- Airborne noise
- Underwater noise
- Light
- Physical disturbance of seabed from anchoring or spud cans
- · Rock dumping to prevent scour around the spud cans

Most Drilling Operations effects

SPUD CANS

Accidents need full preparations & regulations in order to reduce likelihood

required routine & strict authority supervision; **BLOW OUT**

PREVENTOR and mitigate consequences.

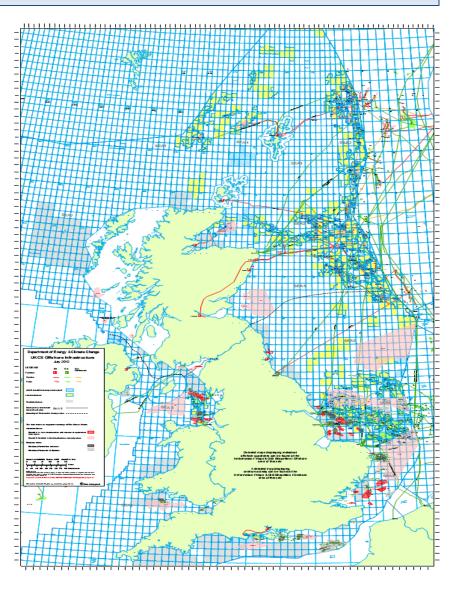
U.S.A - Long List of Federal Regulations

- Responsibility for 7 billion people, over 6200 leases, ~3,200 production structures, over 34,000 wells.
- Vast & Mature Industry.
- Hundreds of Federal Regulations,
 long complex "shop list" to comply.
- Authority Ministry of interior.
- Enforcing BOAM , BSEE.
- Central Control & supervision
 (Is it effective?)



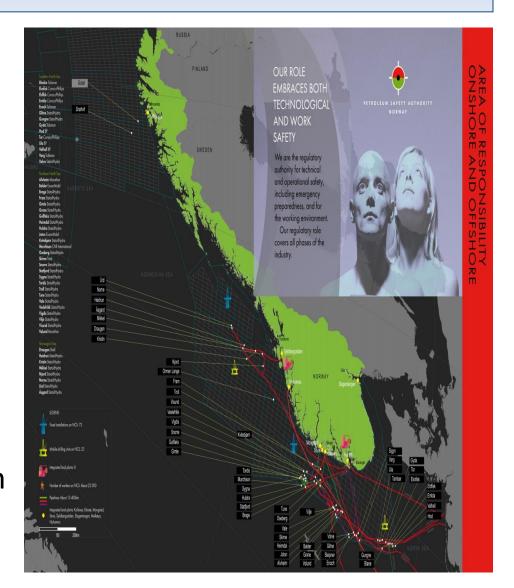
UK- Separation of Enforcing Powers

- Over 300 Offshore facilities.
- Regulations as outcomes of disasters (Torrey Canyon- 1967, Piper Alpha- 1988).
- Goal-setting approach to safety.
- Close cooperation and trust between regulators & industry.
- Enforcing authorities/Regulators:
 - HSE Health and Safety Executive.
 - EDU Energy Development Unit.
 - MCA Maritime & Coastguard Agency.



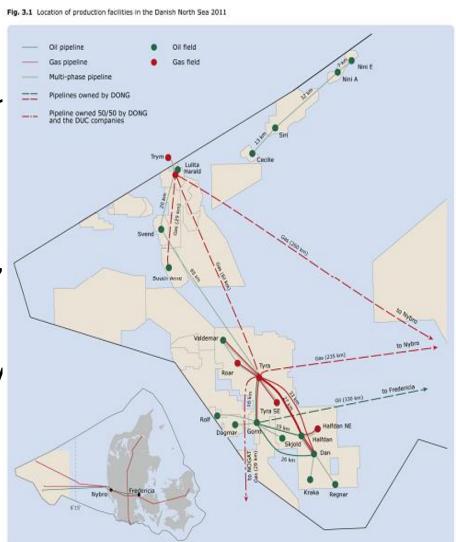
Norway- Flexibility and Trust Regime

- ~ 120 offshore facilities (fix & mobile); 300 subsea facilities.
- Regulations change after disasters(A.Kiellan,1980).
- Goal-setting approach to safety legislation.
- Regulatory supervision spans all phases.
- Flexibility & trust on industry profession.
- Regulator PSA (Petroleum Safety Authority).
- Full public transparency.



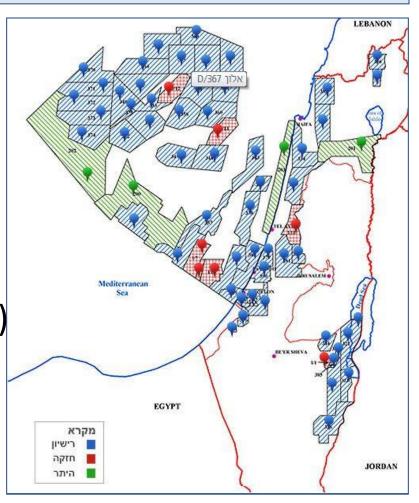
Denmark- Clear & Efficient Regime

- Over 40 offshore facilities (fix & mobile).
- Regulations established after learning & analysis.
- Clear & efficient regime goal-setting approach.
- Supervision spans all phases, based also on 3rd expert review.
- Flexibility & trust on industry professionalism.
- Regulator DEA (Danish Energy Agency).
- Full public transparency.



Israel - Racing Towards a Disaster

- Evolving industry.
- Regulator Energy Ministry.
- Regime ???
- Contingency plan &
 abilities ? ("in progress")
- **Special legislation** not defined.
- Public transparency ??



EU – Facing the Problem

EU investigation after DWH (2010) showed that EU faces a threefold problem:

- A) The risk of a major offshore oil / gas accident is significant:
 - (1) Existing legislation & regulatory insufficient.
 - (2) Existing industry practices provide partial solution.
- B) Suboptimal levels of emergency preparedness.
- C) Inadequate liability provisions.
- ** That cause EU to Chang Policy to Directive **

(instead of guidelines) activate 2013-2014

Comparison Chart

subject	USA	UK	Norway	Denmark	Israel
Enforcing Authorities	воем,	EDU, HSA,	NPD, PSA	DEA, KLIF	Gas Authority,
	BSEE	MCA			Petroleum
					directorate
Regulations /Standards	Exist	Exist	Exist	Exist	Not defined
Enforcing Planning &	Compelling	Compelling	Compelling	Compelling	Not defined
Pre-Approval (well					
design, cementing,					
BOP'S, SEMS, ESD,etc)					
Central and Self	Exist	Exist	Exist	Exist	Not defined
Supervision (including					
equipment) & Objective					
Expert Control					
Contingency Plan &	Compelling	Compelling	Compelling	Compelling	????
<u>abilities</u> -equipment,					
training preparations.					
Developer Liability and	Exist &	Exist &	Exist &	Exist &	Not defined
compensation	defined	defined	defined	defined	In published
provisions					regulations

Recommendations for Israel

- Strict regime with goal setting approach (Danish & EU regulations and standards).
- Revised and simplified legislation guidelines.
- International cooperation (regulators, risk mitigation).
- All exploration and drilling activities should require preparation of EIA.
- Central control and strict supervision while using objective 3rd party revision experts.
- WCS mitigation of oil spills and accidents(the full national contingency plan).
- Full developer-responsibility and insurance capacity for outcomes (global standards).
- Full Transparency and public oversight for all phases.

Thank You

