

Preparation of Response Plans for Oil Spills from Offshore Facilities

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Introduction

This API Recommended Practice (RP) for the preparation of offshore oil spill response plans was developed for organizations engaged in the oil and gas exploration, production, and transportation (pipeline) industry to capture lessons learned during the response to the 2010 BP/Deepwater Horizon oil spill in the Gulf of Mexico. It was prepared by the API Oil Spill Preparedness and Response Subcommittee - Spill Planning Workgroup which consisted of oil spill planning and response subject matter experts from various API member companies as well as non-member oil and gas companies, consulting firms, Oil Spill Removal Organizations (OSROs) and the regulatory community. It was originally developed as a guidance document but subsequently converted to a Recommended Practice to facilitate wider distribution and utilization.

In developing the original guidance document, the Workgroup identified the types of information and guidance that would be most useful in implementing a response to an offshore oil spill particularly in the initial or reactive phase. Current best practices in oil spill planning and preparedness developed and/or utilized by the Workgroup members were incorporated where practical and appropriate. Lessons learned from the Deepwater Horizon incident, available oil spill planning and preparedness guidelines (both U.S. and International), and current U.S. oil spill planning regulations for offshore and coastal areas were also used to inform the development of the document content and format.

The guidance document was well received by API members resulting in the decision to convert it to an RP. RPs require additional rigor with respect to content and format as well as the involvement, to the extent practical, of external parties including the regulatory community. The aforementioned, more inclusive, Spill Planning Workgroup was then formed and over the course of close to two years, made significant revisions to the original guidance document to incorporate additional best practices and lessons learned as well as to improve the content and format and to comply with API's RP standards.

It is important to note that the use of this RP in the development of an oil spill response plan will not guarantee 100 percent recovery of subsequent oil spills nor will it eliminate all potential environmental impacts. Plans developed using this guidance should, however, increase the chance of an expeditious, well-coordinated and effective response to an oil spill.

The main body of this RP provides general information on references, terminology and considerations that were taken into account when developing this document. The recommendations developed by the Workgroup in Section 3 include a number of features and concepts that were incorporated into the design of this RP. Annex A of the RP contains a template and detailed recommendations for preparing offshore oil spill response plans whereas Annex B contains guidance for the optional "Quick Guide" that often accompanies an oil spill response plan. Annex C contains a bibliography of documents used to inform the development of this RP or that can be used to inform the content for selected sections of an oil spill response plan.

Preparation of Response Plans for Oil Spills from Offshore Facilities

1 Scope and Purpose

This API Recommended Practice (RP) provides information and guidance for the development of oil spill response plans primarily for the offshore U.S. oil and gas exploration, production, and transportation (pipeline) industry. However, the general plan concepts described in Section 3 can be applied to oil spill response plans developed for all types of coastal/marine assets or operations, both in U.S. and international locations. Additionally, this RP, or selected components of it, may be used to inform the development of response plans for any company, organization, or public agency that oversees or conducts the response to oil spills.

The primary purpose of this RP is to compile a series of best practices and other information from workgroup members into a document that can guide the user in the preparation of effective and functional oil spill response plans for offshore facilities. The RP can also be used to modify portions of existing oil spill response plans to enhance effectiveness and functionality.

Although plans prepared or modified using this RP can be used to replace existing response plans required by regulation, the RP is not intended to be a regulatory compliance guideline or to supersede current regulations. The content recommended by this RP was, however, benchmarked against Bureau of Safety and Environmental Enforcement (BSEE) regulations (30 CFR Part 254 and associated guidance in NTL 2012-N06) and found to be in general compliance but will depend on the specific information plan holders include in each section. Conversely, the recommended content is not limited to addressing current BSEE or other regulatory requirements and exceeds those requirements in many areas. Consequently, the incorporation of additional information may be necessary to comply with agency-specific requirements and information not required by regulation can be removed if it does not apply, or add value, to the plan holder.

2 Terms and Definitions

For the purposes of this document, the following definitions apply:

2.1

agency

A division of federal, state, local, or tribal government with a specific oil spill preparedness or response function.

2.2

area command

An organization established to

- a) oversee the management of multiple incidents that are each being handled by an Incident Command System Incident Management Team organization, or
- b) oversee the management of large or multiple incidents to which several incident management teams have been assigned.

NOTE Area command has the responsibility to set overall strategy and priorities, allocate critical resources according to priorities, ensure that incidents are properly managed, and ensure that objectives are met and strategies followed (see also: Unified Area Command).

2.3**area contingency plans****ACP**

The plan prepared by an area committee that is developed to be implemented in conjunction with the National Contingency Plan (NCP) and Regional Contingency Plan (RCP), in part to address removal of a worst-case discharge and to mitigate or prevent a substantial threat of such a discharge from a vessel, offshore facility, or onshore facility.

2.4**asset**

Any facility, installation, or device installed at a fixed offshore location for the purposes of engaging in oil or natural gas exploration, production, or transportation by pipeline.

NOTE This includes mobile offshore drilling units (MODU's), platforms, subsea oil pipelines, oil/gas wells, flowlines, etc. Also refer to "offshore facility" in applicable regulations.

2.5**boom**

Floating barriers used to contain or control the spread or movement of oil on the surface of the water.

2.6**company**

Any entity engaging in business, such as a proprietorship, partnership, or corporation (either for-profit or not-for-profit).

NOTE A plan holder may be a company, but not all plan holders are necessarily companies.

2.7**decanting**

A process to separate mixtures, such as oil and water, by allowing the mixture of liquids to settle and separate by gravity before pumping or draining the water from the bottom of the container.

2.8**discharge**

Any emission (other than natural seepage) of oil, intentional or unintentional; includes, but is not limited to spilling, leaking, pumping, pouring, emitting, or dumping.

2.9**dispersant**

Chemical agents consisting of surfactants and solvents that facilitate breaking oil into tiny droplets that are dispersed into the adjacent water column by wave or turbulent energy.

2.10**Federal On-Scene Coordinator****FOSC**

The federal official designated to direct and coordinate responses to oil or hazardous-substance releases under the NCP.

2.11**In-situ burning**

The ignition and controlled burning of floating oil, at or near the location of the spill, with the aid of a specially-designed fire-containment boom or other suitable barriers.