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Industry Guidance Bulletin 22-00X
Emergency Well Control Contingency Plan

The Alaska Oil and Gas Conservation Commission (AOGCC) provides the following supplement to emergency well control contingency plan (Plan) requirements as outlined in the regulation 20 AAC 25.529 that became effective XXXX.

Application Process

- (a) The Plan must be submitted to and approved by the AOGCC prior to the AOGCC approving an application for a Permit to Drill (Form 10-401) or an application for Sundry Approvals (Form 10-403).
- (b) The applicant is encouraged to schedule an informal pre-application meeting with the AOGCC prior to submitting the Plan for approval review.
- (c) The AOGCC is under no regulatory required timeline for Plan approval. The estimated approval time ranges from 30 to 60 days after the receipt of a complete Plan, depending on the complexity of the well(s) covered by the Plan. This estimated approval time range does not include the time for the Form 10-401 or 10-403 approval.
- (d) Upon approval, the AOGCC will issue a unique Plan ID that must be included on all Form 10-401 or 10-403 applications.

Plan Contents

A Plan submitted for approval to meet the requirements of 20 AAC 25.529 must contain the following information on emergency well control operations:

- (a) The submitted Plan must be accompanied by a cover page or promulgation letter that includes:
 - (1) the name of the Plan holder and the covered facility, well(s) or operation, followed by the words "Emergency Well Control Contingency Plan";
 - (2) the date of the Plan; and
 - (3) a statement, signed by a person with appropriate authority, committing the blowout prevention and response resources necessary to implement the Plan.
- (b) an official Plan title;
- (c) a complete table of contents and lists of any tables or figures, with corresponding page numbers;
- (d) a cross-reference table, as needed, that directs the reader to the appropriate information;
- (e) immediate reporting and notification - a description of the immediate blowout reporting actions to be taken at any hour of the day, including the:

- (1) title and telephone number of facility personnel responsible for making the notification; and
 - (2) government agency telephone contact numbers for the purposes of notification if a well control incident occurs;
- (f) safety - based on applicable safety standards, a description of the steps necessary to develop an incident-specific safety Plan to implement well control procedures;
- (g) communications – a description of field communications procedures;
- (h) facility diagrams detailing the pad and a well diagram. The Plan diagram of the facility or operation should be sufficient for reference in conducting emergency well control operations, with staging locations for well control equipment and other features pertinent to the Plan clearly marked, and include surrounding topography, roads, air transportation and other transportation access, location and bathymetry of adjacent water bodies, mooring areas, oil transfer locations, pipelines, and control stations, and a representation of the distance and gradients for well control operations located on land, by topographic map, aerial photographs, or other means;
- (i) procedures to regain control of an uncontrolled flow of oil, gas, drilling mud and any other substances from an exploration or production well to the surface and stop surface discharge within 15-days, including:
- (1) conditions that activate primary and secondary prevention measures;
 - (2) site-specific procedures, methods, equipment, personnel, logistics, and time frames that will be employed to control a well and stop surface discharge within 15 days;
 - (3) additional intervention strategies where applicable to account for potential variations in operating and seasonal conditions. Intervention strategies must include:
 - (A) Description and discussion of applicability of:
 - (i) dynamic surface control response(s);
 - (ii) surface/subsurface intervention plan(s);
 - (iii) well capping plan(s); and
 - (iv) preliminary relief well planning, including:
 - a. identification of a minimum of two suitable locations for drilling a relief well; and
 - b. an overview of appropriate drilling rigs that could potentially be mobilized, rig ownership, seasonal commitments and availability, and the rig staging or normal operating location(s);
 - (B) a description of methods to prevent or control a potential fire hazard;
 - (C) a discussion on any operating limitations that might be encountered that could render the blowout planning ineffective; the discussion must address:
 - (i) weather, including wind, visibility, precipitation and temperature;
 - (ii) sea states, tides, and currents;
 - (iii) ice and debris presence;
 - (iv) hours of daylight; and
 - (v) other known conditions (environmental or otherwise) that might influence the efficiency of the intervention equipment or the overall effectiveness of the intervention effort;
- (j) management structure for the activation of emergency well control procedures, including command system details to address the following:

- (1) a description of the command system to be used in response to a loss of well control, including the title, address, telephone number, and affiliation by company, agency, or local government of each person:
 - (A) this list must include command, fiscal, operations, planning, and logistics lead personnel;
 - (B) the command system must be compatible with the state's response structure outlined in the state master plan prepared under AS 46.04.200;
 - (C) the command system must be consistent with the operator's state-approved Oil Discharge Prevention and Contingency Plan; and
 - (D) clearly identify the integration of source control operations within the management structure;
- (k) emergency well control equipment - a complete list of contracted or other well blowout control related equipment to meet the 15-day requirement to have the well under control; the list must include:
 - (1) the location, inventory, and ownership of the equipment;
 - (2) the time frame for delivery and startup of emergency well control equipment and trained personnel located outside the facility's primary region of operation;
 - (3) the pressure rating and pressure test certification, temperature capacity/limitations/derating protocol and operational characteristics for each item;
 - (4) each rig designated for emergency well control operations, including drilling, coil tubing, snubbing, and workover rigs;
 - (5) information on additional rigs and equipment available from other sources for blowout control operations, including, if applicable, procedures for inventorying, training personnel, and equipping rigs;
 - (6) identification of all permits, approvals, or authorizations necessary to transport, stage, and operate emergency well control equipment and implement emergency well control operations, inclusive of relief well drilling, and the timeline for obtaining them;
- (l) logistical support detail - identification of aircraft, vessels, and other means that may be used to transport equipment and personnel to support emergency well control operations, including information on operational limitations, ownership, and availability of the identified means of transport;
- (m) deployment strategies - a description and chronology of the proposed actions that may be taken to respond to a loss of well control incident, including:
 - (1) procedures for the transport of equipment, personnel, and other resources to the uncontrolled well or surface blowout site, including plans for alternative methods in adverse weather conditions;
 - (2) if the operator is not the emergency well control contractor, procedures to notify and mobilize the emergency well control contractor identified in the plan, including a description of the interim actions that the operator will perform until the emergency well control contractor identified in the plan initiates efforts to regain source control of the blowout; and
 - (3) a description of methods to prevent or control a potential fire hazard;
- (n) emergency well control contractor information - if a plan holder proposes to use the services of an emergency well control contractor, the plan holder shall include a correct and complete list, with name, address, telephone number, and affiliation by company, and for each contract, a statement signed by the plan holder and the emergency well control contractor attesting to the AOGCC that the contract:

- (1) clearly specifies that the contractor is obligated to:
 - (A) provide the response services and equipment listed for that contractor in the well control contingency plan;
 - (B) respond if a loss of well control or surface blowout occurs;
 - (C) notify the plan holder immediately if the contractor cannot carry out the response actions specified in the contract or the contingency plan;
 - (D) give written notice at least 30 days before terminating its contract with the plan holder;
 - (E) respond to a commission-conducted well control or blowout exercise required of the plan holder; and
 - (F) continuously maintain in a state of readiness, in accordance with industry standards, the equipment and other spill response resources to be provided by the contractor under the contingency plan;
- (2) the use of a well control emergency well control contractor does not relieve the plan holder of its responsibility to provide the information required and to meet all other applicable requirements;
- (o) include training detail - a detailed description of the training programs for well control and blowout response for wellsite and emergency well control contractor personnel;
- (p) include additional information - other information necessary to provide background for verification of the plan contents;
- (q) include a bibliography - a list of data and information sources used to determine the information contained in the plan.

It is the responsibility of the operator to ensure that any contents of the plan that are confidential are clearly marked as such.

Definitions

- (a) Emergency well control contractor: contractor with the expertise to develop and implement intervention operation for the purpose of regaining control of an uncontrolled well incident, including a surface blowout.

Please share this Guidance Bulletin with all appropriate members of your organization. Questions regarding this guidance should be addressed to Samantha Carlisle at samantha.carlisle@alaska.gov or by phone at 907-793-1223.

Sincerely,

Jeremy M. Price
Chair, Commissioner