

HID Regulatory Inspector's Contact Report



Case No: 4518514

Service Order No: SVC4382034

ED REGULATORY INSPECTOR'S CONTACT REPORT

Name of Company: Horse Hill Developments Limited.

Address:

Wellsite Address:

Horse Hill Site, Horse Hill, Hookwood, Horley, Surrey, RH6 0HN

Duty holder Address:

1 Farnham Rd, Guildford, Surrey GU2 4RG

Date of the Inspection: 23 August 2018.

Name and Address of Inspector: []i

Unit/Division: ED 6

Other Staff Attending:

Unit/Division:

Persons Seen:

[]

[]

[]

Position:

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[]

[]

Reason for Contact:

This is a planned inspection conducted as a Well Engineering and Operations Specialist to assess the well operator compliance with the relevant legislation.

Background: Background

Horse Hill -1 well (LR/24-4) was drilled in 2014 as a conventional appraisal well on the objective to evaluate the Portland and Kimmeridge prospects.

In April 2018 Horse Hill Developments submitted a well notification to carry out an extended well testing on the objective of quantifying the productivity and the extent of the hydrocarbon accumulations in the Portland Sandstone and Kimmeridge Limestones.

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Matters dealt with / action taken during the inspection:

During the time of inspection pressure build-up operation was underway as part of the well test programme. This involves having production Xmas-Tree installed and the well test spread being in place. The well control equipment, including the BOP, slickline PCEs, etc had been demobilised. The inspection agenda included Well Operations and Well Control, Well Integrity Management of existing wells (production, suspended, etc) and general safety management on site.

At the end of the inspection visit a washup meeting was held onsite with the personnel mentioned above. The following were discussed:

- The Well Planning Design and Operations Standards should Configuration of the blowout preventers (BOP).
- Kick detection during tripping and circulation operations.
- The risk assessment for running and retrieval the production string.
- Well shut in procedures in the event of well control.
- The competence of personnel carrying out the well operations.
- The Site Safety Document.
- Well control drills.
- The ESD system and Emergency response plan.
- The well handover form.
- Well integrity management for production, suspended and injection wells, including integrity of the wellhead and annuli.

Following the inspection a Notification Of Contravention (NOC) was sent to the well operator (attached below)



Ltr Horse Hill Dev
Ltd - Visit 23.8.2018

Action Required by Companies :

- Take the necessary actions to remedy the identified issues.
- Respond to HSE 's letter with the actions taken.

Action by HSE:

- Review the Horse Hill's response to the NOC and take the appropriate actions.

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Author: []. HM Inspector- Well Engineering and Operations.	Band : 3	Date of Report: 07 Sept 2018.
Copies to: [], [], Mine Inspection team, [] and []		



Energy Division

Horse Hill Developments Limited
1 Farnham Road
Guildford
GU2 4RG
Surrey
United Kingdom.

ED Unit 6 Section 3 Wells
Aberdeen - Lord Cullen House
Lord Cullen House
Fraser Place
Aberdeen
AB25 3UB

Tel: 020302811

@hse.gov.uk

Reference
SVC4382034

<http://www.hse.gov.uk/>

HM Principal Inspector of H&S

For the attention of

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Date 06 Sept 2018

Dear Sirs

HEALTH AND SAFETY AT WORK ETC ACT 1974

I visited your site Horse Hill -1 (Well number: LR/24-4) located at Horse Hill, Hookwood, Horelev . Surrey on the 23rd of August 2018 to assess how well you were managing health and safety. I met () and ()

I identified contraventions of health and safety law. This letter explains what was wrong, why it was wrong and what you need to do to put things right. Please e-mail or write to me confirming that you have taken action on each of these matters by 4th of October 2018.

It is important that you deal with these matters to protect people's health and safety. If you do not understand what action to take then please contact me or my Principal Inspector and we will explain further.

You will have to pay a fee because I have identified contraventions of health and safety law which are material breaches. The enclosed section on Fee for Intervention provides further information.

Section 28(8) of the Health and Safety at Work etc Act 1974 requires me to inform your employees about matters affecting their health and safety. As such, a copy of this letter should be placed on a suitable Safety Notice Board and visible to those in your employment.

You will find information and advice about health and safety on our website <http://www.hse.gov.uk/>

Yours faithfully

HM Inspector of Health and Safety
ED 6.3. Well Engineering and Well Operations.

MATERIAL BREACHES – NOTIFICATION OF CONTRAVENTION

1. The Offshore Installations and Wells (Design and Construction, etc.) Regulations, 1996

Regulation 13: General Duty: Kick Detection during circulation operation.

The regulation requires you to ensure that a well is so designed, modified, commissioned, constructed, equipped, operated, maintained, suspended and abandoned that:

- a) so far as is reasonably practicable, there can be no unplanned escape of the well fluids from the well; and
- b) risks to health and safety of persons from it or anything in it, or strata to which it is connected, are as low as reasonably practicable.

My inspection revealed that:

- a) Configuration of the blowout preventers (BOP) does not provide adequate means to handle potential well control events as required by the current API Standards 53. In that, while it has means for closing and sealing the wellbore on the work string and on open hole it does not have means for stripping in the work string.
- b) The arrangements you have in place for kick detection during tripping and circulation operations do not provide sufficient assurance for an effective detection of anomalies of well parameters.
- c) The well handover form/certificate does not contain all the necessary information as recommended by the UK Oil and Gas Guidelines. In that, it does not contain the number of turns required to close and to open the manual gate valve, the status of the annulus gate valves and well head voids.
- d) With reference to the well integrity test report (Document No. HHDL-HH1-WIPTR-R0, June 2018) there is no evidence to suggest that there have been checks on the pressure and the integrity of the wellhead voids.

You must:

- I. Perform a risk assessment for the BOP configuration and act upon the results to ensure that the risk of loss of well control is as low as reasonably practicable.
- II. Ensure that you have sufficient and effective arrangements for kick detection during tripping and normal circulation operations.
- III. Ensure that the well handover certificate includes all the necessary information as recommended by the current UK Oil & Gas Well Lifecycle Integrity Guidelines.
- IV. Ensure that the integrity of the wellhead voids is checked on a regular basis as part of the regular well integrity checks and testing.

ADVICE

The following items are not material breaches; however, I recommend you take the action advised below:

- 1) The Well Planning Design and Operations Standards should be revised in a way to incorporate the current industry standards and best practices.
- 2) The risk assessment and well shut in procedures should be more specific to reflect the arrangements in place and the equipment in use.
- 3) The safety document should be revised and updated in a way to reflect the rig-less well testing operations.
- 4) With reference to the well integrity test report (Document No. HHDL-HH1-WIPTR-R0, June 2018) the annuli are topped up with fresh water, which can present a potential risk of corrosion. It is recommended that, for production, injection and suspended wells, the annuli are filled with inhibited fluids and that positive pressure is applied.

For further guidance you may refer to the UK Oil & Gas Well Lifecycle Integrity Guidelines.

FEE FOR INTERVENTION

Health and Safety and Nuclear (Fees) Regulations 2016, Regulations 22 and 23

HSE will recover the costs that it incurs for the work it does in relation to contraventions of health and safety law which are material breaches. A material breach is something an Inspector considers is serious enough that they need to inform you of it in writing.

The fee is based on the amount of time that the Inspector has had to spend identifying the breach, helping you to put it right, investigating and taking enforcement action. This includes the cost for the whole visit, along with other associated work.

Sometimes an Inspector may decide to write to you about matters which are not material breaches. This includes any matters listed as 'Advice'. HSE will not recover costs for the time it takes to do this.

We send out invoices every two months and you will have 30 days to pay. You may receive more than one invoice if the work done by the Inspector covers more than one invoicing period.

You can dispute the invoice. You can find further information about fee for intervention and details of how to dispute an invoice in the leaflet HSE 48 - *Fee for Intervention: What you need to know* at <http://www.hse.gov.uk/pubns/hse48.pdf>.

Further information is also available on HSE's website at <http://www.hse.gov.uk/fee-for-intervention/>

Dave Salmon

From: @Horsehilldevelopments.co.uk>
Sent: 18 March 2019 09:29
To:
Cc:
Subject: HPE CM: RE: Surrey Earthquake

Good morning

Hope all is well.

We have both annulus and tubing pressure surface readout pressure and temperature gauges on the Broadford Bridge 1 and Horse Hill 1 well.

Measurements on both wells have shown no abnormalities following the reported earthquakes.

Regards,

For and on Behalf of:



HORSE HILL
DEVELOPMENTS

1, Farnham Road
Guildford
Surrey
GU2 4RG
United Kingdom

M: +44 (0)7984 1
@horsehilldevelopments.co.uk

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From: @hse.gov.uk <@hse.gov.uk>
Sent: 27 February 2019 11:45
To: @Horsehilldevelopments.co.uk>
Cc: @Horsehilldevelopments.co.uk>
Subject: Surrey Earthquake
Importance: High

Gents,

With regards to the tremors which took place in Newdigate/ Surrey this morning please ensure that the integrity of the wells under your operatorship has been checked and update HSE with the results.

Kind Regards

| HM Inspector of Well Engineering & Operations | Energy Division - Offshore

Health & Safety Executive | HID Energy Division, ED 6, Lord Cullen House, Fraser Place, Aberdeen, AB25 3UB | ☎ :

Direct Line +44 (20) 3028- / Mob. +44(0) ☒ : @hse.gov.uk

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www.hse.gov.uk

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