

## Commission of Inquiry

### Montara Well Head Platform Uncontrolled Hydrocarbon Release

Submissions by Atlas Drilling (S) Pte Ltd and Seadrill Management (S) Pte Ltd in response to the draft preliminary findings of the Commission entitled "The Regulatory Regime: Well Integrity and Safety" (Draft Regulatory Findings)

1. Atlas Drilling (S) Pte Ltd and Seadrill Management (S) Pte Ltd (Atlas) make the following submissions concerning the Draft Regulatory Findings provided by letter from the Commission dated 17 May 2010.
  - A **Proposal regarding creation of independent statutory authority**
    2. Atlas proposes that a single, independent statutory authority be formed responsible for well integrity, safety, environmental and working environment regulation.
    3. Alternatively, if such an authority is not established (or in the period until such an authority can be established), Atlas proposes that consideration be given to place primary responsibility for well integrity under the authority of NOPSA.
  - B **Prescriptive minimum requirements for blowout preventing barriers**
    4. Atlas agrees with the draft recommendation (at paragraph 66 of the Draft Regulatory Findings) that the Management of Well Operations Regulations be amended to include prescriptive minimum requirements for barriers in offshore wells. Atlas considers that these minimum requirements should prescribe the minimum number, their placements, type and methods of testing and verification of barriers to be in place in offshore wells.

5. Atlas considers the legislation should provide prescriptive minimum requirements applicable to temporary, long term and permanent abandonment and precisely define what constitutes each category of abandonment.

**C. Minimum education and experience for license operators' offshore supervisors**

6. Given the high level of responsibility held by offshore supervisors of the license operator and the serious consequences to safety and the environment from incidents occurring during offshore petroleum operations, Atlas considers that the relevant legislation should be amended to prescribe minimum qualification and experience requirements for different levels of offshore supervisors.

  
CLAYTON UTZ

Dated 24 May 2010