

Understanding onshore oil and gas well notifications

Open Government status

Fully open

Target audience

Energy Division Wells Inspectors and administrative staff, other ED Inspectors dealing with notifications.

Contents

[Summary](#)

[Introduction](#)

[Background](#)

[Action](#)

[Appendix 1 BSOR Notifications](#)

[Appendix 2 Key differences between a consent and a notification](#)

[Appendix 3 Lines to take in response to BSOR notification enquiries](#)

Summary

This guidance explains and clarifies the onshore wells notification process to wells inspectors, administrative staff and the onshore oil and gas industry. In particular, it highlights:

- that notifications do not form part of a consent process
- which well operations are subject to notification and the relevant notification periods
- the purpose of the regulations on material changes to notifications (such as what can be considered a material change and what changes should be addressed by a new notification)
- the process for revalidating old notifications where operations have yet to start

Introduction

Identifying which onshore well operations must be notified

Regulation 6(1) of the Borehole Sites and Operations Regulations 1995 (BSOR) requires site operators to notify HSE at least 21 days in advance before they begin defined operations (shown in [Appendix 1](#)). This applies to all onshore well operations in Great Britain used to prospect for or extract oil, gas or coal bed methane.

The purpose of a BSOR notification is to inform HSE of the forthcoming well operation and to demonstrate that the planned operation will be carried out safely. It should contain sufficient information for inspectors to understand the nature of the operation and satisfy them that the risks to health and safety specific to the well operation have been identified and suitable controls are being implemented. Schedule 1 Part 1 of BSOR describes the specific areas to be addressed in notifications.

HSE does not form part of the decision making process for the operation. That is the role of the well operator, borehole site operator, drilling and other contractors and the well examiner appointed by the well operator.

Notifications made to HSE under BSOR are **not** part of a consent process. This differs from consent processes adopted by the majority of regulators worldwide. A wells consent regime was previously operated by HSE using the conditions under which petroleum licenses are issued. This process is no longer used and HSE now requires notification of specified well operations no less than 21 days in advance. The key differences between a consent application and a notification are shown in [Appendix 2](#).

Although BSOR requires borehole site operators to submit relevant notifications to HSE, it is the duty of the well operator (as defined by the Offshore Installations and Wells (Design and Construction, etc.) Regulations 1996) to put into effect the well examination arrangements.

Submission of additional or missing information

When notifications are sent to HSE with required information missing or where the inspector reviewing the notification wishes to see further detail, the borehole site operator must provide further information if requested by the inspector. Receipt of missing information in written form, including by email, is sufficient to meet the requirements of the regulations. The borehole site operator is not then required to amend the original notification or to resubmit it.

Material change to notification of onshore well operations

Regulation 6(5) of BSOR requires the operator of a borehole site to notify HSE as soon as is reasonably practicable of any material change in circumstances relating to an existing notification. Examples of material changes are shown in [Appendix 3](#).

There is no specific regulatory requirement for the well examiner to send a report to HSE (as is required in the Offshore Installations (Offshore Safety Directive)(Safety Case etc) Regulations 2015) when they examine material changes concerning onshore wells. However, a material change to the design or construction of the well requires examination by the well examiner.

Validity of old notifications

There is no expiry limit on BSOR notifications and they do not lapse after a pre-set time. However, for many old notifications where operations have not yet commenced they may have been dropped from operators' work programmes or the information in the notifications may have changed significantly.

Action

Wells engineering and operations inspectors or their administrative support staff should take the following action:

Response to Enquiries - Staff who respond to enquiries regarding BSOR notifications, including material changes, should refer to the lines to take provided in [Appendix 3](#).

Receipt of Additional or Missing Information - Staff who receive additional or missing information in relation to a notification should:

- i. inspect it to ascertain that it provides the relevant information requested by HSE, and
- ii. record it appropriately.

Old notifications – Staff who respond to enquiries regarding notifications older than twelve months should ask the borehole site operator if the work is still planned and, if so, should request that they inform HSE, in writing, before the work commences (advising of the planned start date and confirming that there are no material changes to the original notification).

Background

There is an existing mature onshore oil and gas industry in the UK that has demonstrated a high level of control of major accident hazards. However, the 14th Licensing Round has introduced a number of new operators. Consequently it is important to ensure that all operators of borehole sites continue to have a common and clear understanding of the notification process required by BSOR.

Organisation

Targeting

Onshore oil and gas sector

Timing

To be used to assist responses to external enquiries regarding BSOR notifications.

Resources

As required (wells engineering and operations inspectors and administrative support staff).

Recording & Reporting

None

Health & Safety

None

Diversity

None

Contacts

ED6: Well Engineering & Operations team

Appendices

Appendix 1:

BSOR notification requirements

Is notification to HSE required within 21 days?	Description of onshore well operation
Yes	i. Any drilling of these wells, i.e. where new hole is to be cut
	ii. Re-entry and abandonment of a well
	iii. Other operations on a well which would make a significant alteration to it
	iv. All operations which involve a risk of the accidental release from the well (including running any tools into the well, including on wire-line, if the well is a naturally flowing gas well or has significant shut-in tubing head pressure)
Not normally required	Other well operations not involving drilling, well abandonment or a significant alteration to it (i.e. workovers) provided that adequate safety barriers are in place

Appendix 2:

Key differences between a consent application and a notification

Consent	Notification
Written consent was required before operations could commence.	Absence of enforcement action against a notified operation is not implied consent to the operation. The borehole site / well operator is responsible for the safety of the operations and ensuring that risks to the health and safety of persons are reduced to as low as reasonably practicable. Operations should not proceed unless it is safe to do so.
Operations could commence on receipt of written consent.	No consent is issued. Operations may legally commence after the notification period, unless HSE has taken enforcement action to prevent the operations from proceeding. However operations should not proceed unless it is safe to do so.
Operations could commence within the 28 day period provided operator was in receipt of written consent.	Operations may not commence within the 21 day notification period unless HSE has formally agreed to a shortening of the notification period.

Appendix 3:

Lines to take in response to BSOR notification enquiries

Enquiry	HSE response
Does HSE issue consents for onshore wells operations?	Borehole site operators will not receive consent from HSE to commence notified well operations. For a satisfactory submission borehole site operators will receive only an acknowledgement by HSE that the notification has been received. Borehole site operators may commence operations after the notification period has passed, provided it is safe to do so. Borehole site operators are responsible for the safety of the well.
Which well operations must be notified to HSE?	See Appendix 1 . If still in doubt, assume that a notification is required.
Does a change to a well operation require a material change to the notification?	<p>Change of rig –</p> <p>A change in the rig to be used will constitute a material change. If at the time of the notification it is uncertain which rig is to be used, it is recommended that details of all likely rigs, as listed in the appropriate schedule to the regulations, are included. If this is done, the notification of material change needs only identify the rig.</p> <p>Drilling to a new target location –</p> <ol style="list-style-type: none">1. Changes in target, including side-track, where the change is due to unexpected geological conditions or mechanical difficulties in the well, and the geological objective of the well remains the same are a material change and do not require a new notification.2. Side-tracks to a new target with a different geological objective will require a new notification unless sufficient details of the proposed side-track have been included in the original notification.3. Where the borehole site operator plans to side-track for a new geological objective from a current well and the side-track has not been included in

	<p>the original notification, it may be appropriate for HSE to agree to a shortening of the notification period. Regulation 6(1) of BSOR specifically allows for this. HSE internal procedures must be followed before any shortening of the notification period is agreed.</p>
	<p>Major changes –</p> <p>Where changes to a notified operation are of such a magnitude, or alter the risk profile to such an extent, that they require what is effectively a re-write of the drilling or workover programme then, a new notification is required. An example of this is where a decision is made to change from conventional drilling to managed pressure or under-balanced drilling.</p>