

0646R OAD Review Group
Clarification on Site Access
Restrictions

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Version History

Version	Status	Date	Author(s)	Amendments
v0.1	Draft	01.06.20	Darren Dunkley (Cadent)	Creation of draft proposal

Background

Currently under OAD access rights are granted to a party as per the condition set under in Section B6.

These provisions allow a party to attend site as and when they need to essentially operate and maintain their assets in line with their day to day operations.

Under Modification 0683 an amendment to OAD was made to articulate and make clear the conditions that relate to the term "Affected Party" under clause B2.2.3. These changes included four new sub-clauses under B2.2.3(b) including the impact upon site access and restricting site access.

2.2.3 Where:

- (a) a Party (the "Modifying Party") proposes to alter, replace, relocate or add to any of its Connection Facilities; and
- (b) such alteration, replacement, relocation or addition, and/or any works carried out therefor, will or are reasonably likely to affect any other Party (an "affected Party"), including without limitation:
 - (i) interfering with, affecting the compatibility of or otherwise affecting such other Party's Connection Facilities or their operation or maintenance;
 - (ii) interfering with the supply of electricity to the other Party's Connection Facilities or the operation of any electricity equipment comprised in the other Party's Connection Facilities;
 - (iii) interfering with the operation of NTS Telemetry Facilities or Telemetry Connection Facilities;

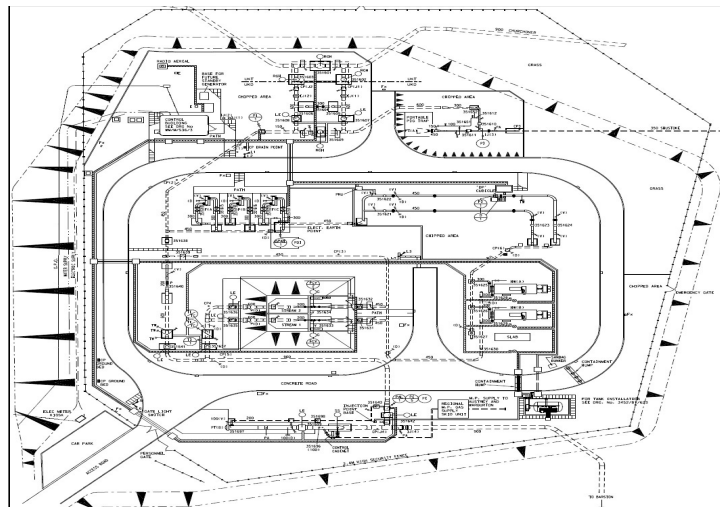
- (iv) **restricting the other Party's access to all or part of the Offtake Site which is owned or occupied by such Party;**
 - (v) or affecting such other Party's rights as Site Owner or Site User or otherwise in relation to the Offtake Site;
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The term “site access” is often mis-interpreted and tends to be used in reference to deny another operator access/entry to an entire site.

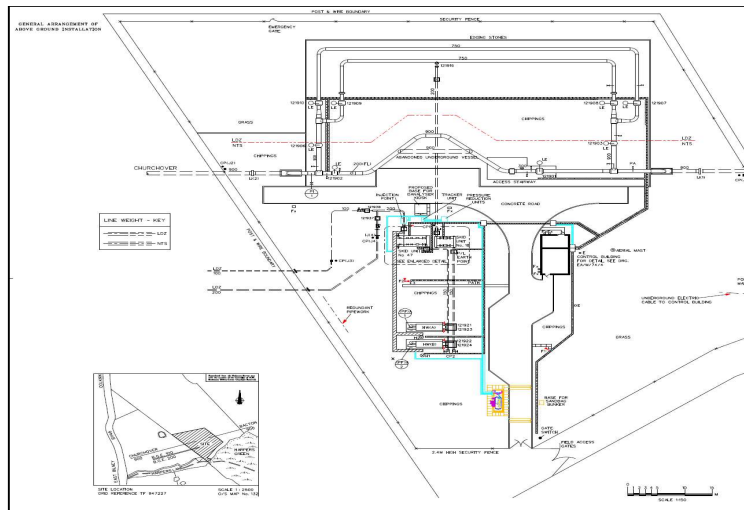
Restrictions are not just limited to a site per se, but restrictions within a site also have knock on consequences. CDM areas are a mandatory requirement under the CDM regulations and affect all operators. In order to access a CDM area you must have the appropriate competencies to enter the cordoned area. As most operators have slightly different competency requirements, i.e. SCO1/2 or SCO94/95, this creates a specific issue if one operator's CDM area encapsulates assets from another operator and routine maintenance needs to be undertaken whilst the CDM area is in place.

Most offtakes have a primary vehicle entrance with a service road to navigate around site. The sites fall into three broad types:

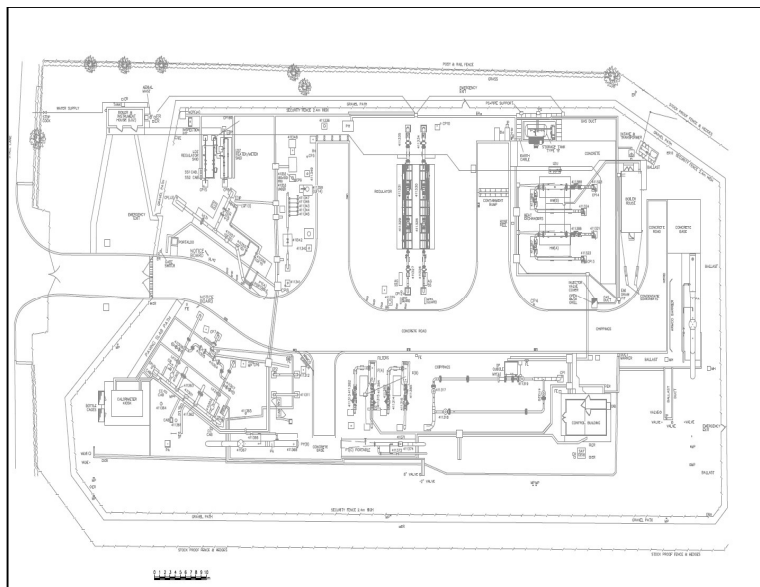
- O-shape offtakes have a looped service road within the site that can be driven around.



- T-shape offtakes have one service road in and out, and a turning section similar to cul-de-sac arrangements.



- Y-shape offtakes also have one road in and out of site however the service road may serve one or more avenues branching from it.



It is very rare that offtakes are the same. Either the size, the layout, the location of assets and how they are integrated and/or connected can vary from site to site. Therefore, when CDM areas or site restrictions are needed the requirements need to be reviewed by a case by case basis and also need to be duly considered as part of the OAD notification process.

Objective

To provide clarity around the different scenarios that exist that impact upon site access or restricting site access so that the operators can agree a way forward in applying the OAD Notification process consistently.

Proposal

There are three broad scenarios that exist. These are:

- *Restricting Site Access.* This covers the preventing of another operator from entering or accessing any part of the gas installation.

There are times where access to site cannot be accommodated. This often depends upon the activity being undertaken and is normally requested on safety grounds. Venting, ILI's, ME2's, heavy plant considerations are all activities where site restrictions are normal. Other site restrictions are where the entire site is covered by a CDM area, such as with a full site rebuild or where a site is receiving an ISS upgrade.

In these instances, an OAD notice is to be raised with as much notice as possible. This will enable the other party to reschedule any planned maintenance where possible so that the respective restriction dates can be avoided or agree how access can be achieved for activities that must go ahead.

- *Partial Site Restriction.* A section within the gas installation is restricted. Vehicle access may or may not be permissible and access around site may be also limited due to the proposed CDM area(s) required.

For Partial Site restrictions this is dependent upon a number of factors:

- the layout of the site
- the location of the other operator's assets on site
- vehicle access in and around site
- the area that needs to be restricted; and
- whether the affected area includes another operator's assets.

It is very rare that offtakes are the same. Either the size, the layout, the location of assets and how they are integrated and/or connected can vary from site to site. Therefore, when CDM areas or site restrictions are needed the requirements need to be reviewed by a case by case basis. Where it is likely access needs to be restricted that will impede the other operator from gaining access to their assets, an OAD notice must be raised.

- *Asset Encapsulation.* A section within the gas installation is restricted. This does not impact upon vehicle access however the proposed CDM area(s) includes assets as owned by another operator.

The CDM regulations provides guidance on how large a CDM area needs to be to support specific activities. Due to the configuration and layout of some sites, a necessary CDM area may encapsulate the assets of another operator. For example, if the downstream operator where to replace the offtake valves a CDM area will be required and this area will include a section of the upstream operator's pipeline(s) as well.

In these instances, an OAD Notice is to be raised with as much notice as possible along with the proposed CDM area(s) that are required. The CDM area(s) may need to be amended and agreed between the parties to allow the other operator to:

- a) enter the CDM area and continue with their activity especially if this is a mandatory maintenance requirement that cannot be avoided; and
- b) enter the CDM area to address faults or emergency issues connected with their assets

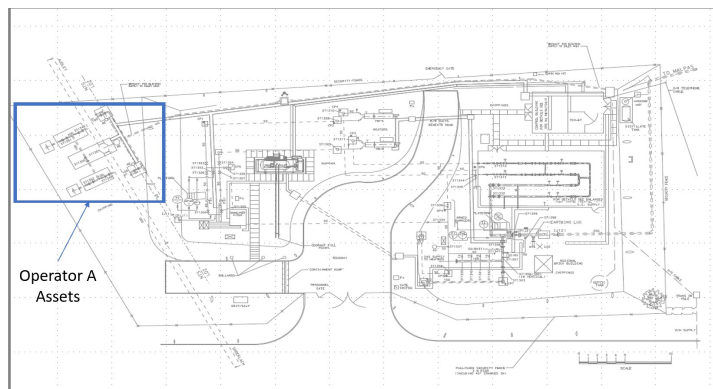
The essential requirement behind this proposal is operator's undertaking the appropriate check to maintaining site safety. The identification of proposed planned work along with any site restrictions or impacts and communicating through the OAD process allows the other operator, and more so the site owner, to undertake the appropriate conflict checks around planned activity so that staff and assets are protected, and gas continues to flow to our customers.

Application:

Scenario 1

If the proposed CDM area does not impede vehicle access, nor does it encapsulate the other operator's assets or access to them, then there is no need for an OAD notice to be raised. This is of course subject to the other tests concerning "affected party" and whether you are a site user.

In the example below, Operator A's assets are located on the far left-hand side of the site so any CDM area around these would not likely to impact the other operator in any way. The side service road would be used by Operator A for vehicles leaving the rest of the site free for Operator B if they needed it.

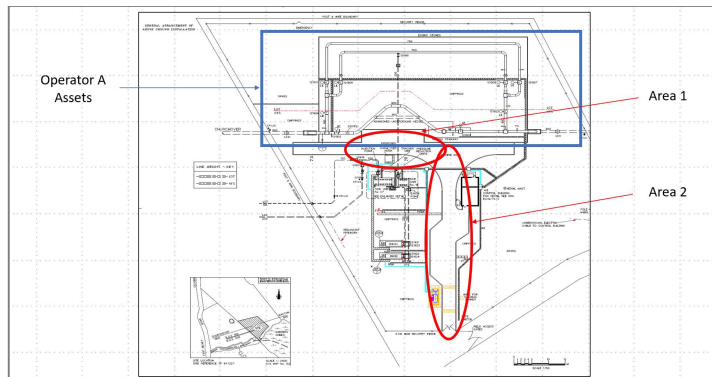


Scenario 2

The layout of a site and location of assets has a significant bearing for CDM areas and site restrictions. In this example, we have a T-shaped offtake with

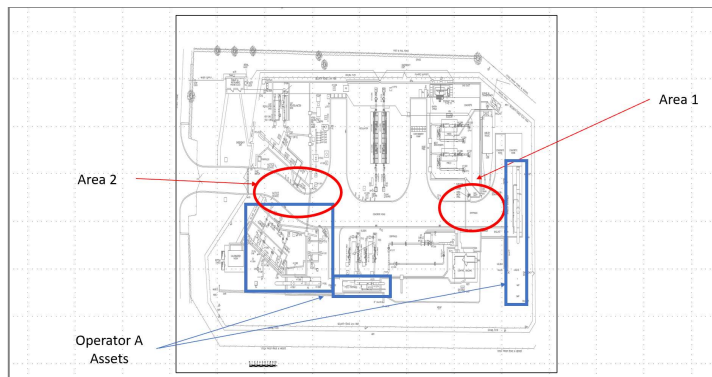
Operator A's assets at the rear of the site and Operator B's assets towards the front and near the site entrance.

Any CDM area's that encroach upon Area 1 by either operator has the potential to impact the other operator gaining access to their assets especially the further they are on the left-hand side of the site. Any CDM's area that encroach or block access in Area 2 by Operator B will likely to impact Operator A.



Scenario 3

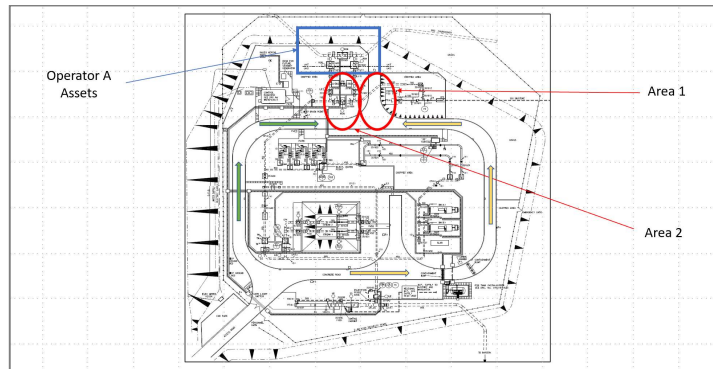
In this example, we have an offtake more aligned to the Y-shaped variety. Operator A's assets reside in several areas and there are couple key pinch point areas where any encroachment of CDM areas or restrictions due to heavy lifting equipment is likely to impact the other in accessing their assets for maintenance or in emergency requirements.



Scenario 4

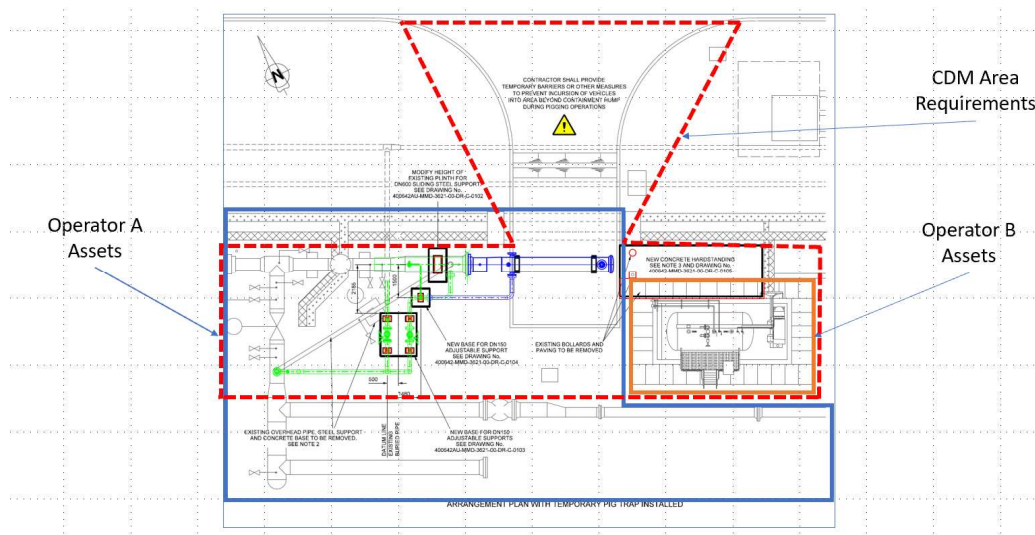
In this example, we have an O-shaped offtake with Operator A's assets again to the rear of site and in close proximity to Operator B's assets. Operator B could impede vehicle access by having a CDM area that encroached into the service road in Area 2. This results in difficulties for Operator A in accessing their assets via the green route. However, providing that access can be achieved via the yellow route then there is no requirement for an OAD notice to be raised, subject to the other impact conditions being met.

However, if either Operator need to restrict Area 2 then this has the potential to impact the other and therefore an OAD notice should be raised.



Scenario 5 – Asset Encapsulation

In this example a necessary CDM area was needed to support one operator's activity that encapsulated the assets of another party on site. The CDM area (red dashed line) was required to be in place for 8 weeks and only staff from Operator A could enter the area once it has been erected. This resulted in a specific issue for Operator B as their assets as encapsulated by the CDM requirements had monthly routine maintenance requirements and the proposed area was going to prevent this from taking place.



The solution in the above example was to create a second CDM area within the original one proposed. This was very similar to the area as highlighted in orange and a separate entrance was provided to enable Operator B to access their assets and remain compliant with their maintenance requirements.

Other Requirements

In some cases, site restrictions are also needed to support maintenance requirements. Where this is necessary the maintenance activity should be included on the shared maintenance plan.

From the original workshop that was held between the operators in 2018 to review the OAD Maintenance requirements under Section G, it was agreed that the impacts used to determine “affected party” under Section B, should be the same criteria for determining whether maintenance should be notified via the shared maintenance plan.

Action

Operators are to review the proposal above and agreed upon the conditions that impact “restriction” at a given site and when OAD notices must be raised.

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