

WELL INTEGRITY PLANNED INSPECTION

1 Introduction

This policy document provides an overview of the general principles the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) applies when undertaking well integrity planned inspections at the titleholder's regulated business premises, facility or other premises.

2 Scope

The *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (OPGGs Act) defines NOPSEMA's functions and gives its inspectors the power to conduct inspections to ascertain whether the requirements of the Act and subordinate regulations are being complied with.

This policy covers NOPSEMA's Occupational Health and Safety (OHS) inspectors approach in conducting planned inspection functions (hereafter called NOPSEMA Inspectors).

The OPGGS Act does not differentiate between inspection and investigation but, for operational reasons NOPSEMA has, they are described as follows:

- Planned inspection is the term NOPSEMA uses to describe those inspections undertaken to ascertain whether a listed OHS law is being complied with, and may include monitoring compliance with a well operations management plan by inspecting the risk management commitments of the well(s) under the OPGGS Act and subordinate legislation.
- Investigation is the term NOPSEMA uses for inspections concerning accidents, dangerous occurrences, a contravention or a possible contravention of a listed OHS law as a basis for enforcement action. These inspections are only conducted where there is a specific justification to do so. Investigations are covered by policies and procedures in the N-03000 series. It is a NOPSEMA policy that warrants will generally only be sought in relation to investigations and are therefore not within the scope of this policy.

Inspections conducted by NOPSEMA relating to compliance with the Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2009 and the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 are not included in the scope of this policy.

3 Relevant legislation

Offshore Petroleum and Greenhouse Gas Storage Act 2006

Part 5 – Well operations management plans and well activities, of the Offshore Petroleum and Greenhouse Gas Storage (Resource Management and Administration) Regulations 2011.

4 Purpose of well integrity planned inspections

Planned inspections are part of NOPSEMA's function under the OPGGS Act to develop and implement effective monitoring and enforcement strategies to secure compliance by persons with their occupational health and safety obligations under the Act and the regulations.

In the event that planned inspections identify deficiencies in the control measures that will be in place to ensure that risks to the integrity of the well are reduced to as low as reasonably practicable (ALARP), that constitute regulatory non-compliance, it is NOPSEMA policy to secure compliance or improvement of the controls of the responsible party via promotion of compliance, or enforcement action in accordance with N-05000 core process series, as appropriate.

NOPSEMA's planned inspections do not physically inspect every element of a well operations management plan activity – rather they operate on a quality assurance basis. Planned inspections are a sampled evaluation of the control measures of the titleholder in managing risks to a level that is as low as reasonably practicable (ALARP).

4.1 Well integrity inspection pre-planning

4.1.1 Selection of titleholders for planned inspection will be undertaken periodically as part of the planning process for the Well Integrity Team and in accordance with Annual Operating Plan and Work Instruction:

N-02300-WN1680 – Main Topics, Sub Topics, Inspection Prompts, Methods & Goals

4.1.2 The selection of titleholders for inspection will be risk based, taking into consideration both the complexity of the well activities being planned or undertaken by the titleholder and the organisational and managerial maturity of the titleholder in accordance with:

N-02300-WN1545 – Well Integrity Planned Inspection Candidate Selection

4.2 Planning a well integrity inspection

4.2.1 Planning of well integrity inspections must be carried out in accordance with NOPSEMA Standard Operating Procedures:

N-02300-SOP1681 – Well Integrity Planned Inspection

N-02300-SOP1424 – Well Integrity Planned Inspection Preparation

N-02300-SOP1094 – Conducting a Well Integrity Inspection

N-02300-SOP1423 – Post Well Integrity Planned Inspection

- 4.2.2 Well integrity inspections will normally be carried out by two appointed NOPSEMA Well Integrity Specialist Inspectors.
- 4.2.3 Well integrity inspections undertaken in conjunction with an inspection of a facility operator's facility may be carried out by a single Well Integrity Specialist Inspector in conjunction with an OHS Regulatory Specialist Inspector.
- 4.2.4 Titleholders must be notified in writing of NOPSEMA's intention to undertake a planned inspection. The notification must include a Planned Inspection Brief N-02300-FM1070 and include the objectives and scope of the inspection.
- 4.2.5 Well integrity compliance planned inspections must focus on, the verification of the titleholder's compliance with the requirement to control and mitigate the risk to the integrity of the well by confirming that:
 1. well management and any well activities are being undertaken in accordance with the commitments made in the well operations management plan in force; and
 2. well management and well activities are being carried out in accordance with recognised international guidance, good oilfield practice and sound engineering principles.
- 4.2.6 The Lead Inspector, in developing the scope of the inspection, must take account of any relevant well integrity incident notifications of accidents and dangerous occurrences investigated by NOPSEMA.
- 4.2.7 The Lead Inspector, in developing the scope of an offshore inspection of a titleholder's compliance, must include a liaison meeting with facility Health and Safety Representatives where practicable.
- 4.2.8 The Lead Inspector, in developing the scope of the inspection, must include a review of the status of the titleholder's implementation of commitments made in response to inspection recommendations from previous NOPSEMA inspections.

4.3 Conducting a well integrity planned inspection

- 4.3.1 Where practical or requested by a titleholder, the inspection team may meet with the titleholder management at least one week prior to undertaking the inspection to address the matters set out in N-02300-FM1070. Minutes of this meeting must be kept.
- 4.3.2 Immediately upon entering a titleholder's regulated business premises, or an offshore facility at which the titleholder is undertaking well activities, to carry out a planned inspection of the titleholder, NOPSEMA Inspectors must:
 1. take reasonable steps to notify the titleholder representative, and in the case of an inspection at an offshore facility, the operators representative, the purpose of the inspection
 2. present their inspector's cards to the titleholder's representative on request, and if the inspection is being carried out at an offshore facility, to the operator's representative
 3. in the case of an offshore facility, if there is a health and safety representative (HSR) for a designated work group having a group member likely to be affected by the subject matter of the inspection, the inspector must give the HSR a reasonable opportunity to consult on the subject matter of the inspection.

- 4.3.3 The inspection must verify that the risk control and mitigation measures, as set out in the well operations management plan, for the inspection topics identified in the scope of the inspection, are fully implemented, functioning correctly, being maintained, being correctly used by competent persons, and the effectiveness of the controls are being audited by the titleholder.
- 4.3.4 Where the need for a major change in the focus of the inspection occurs during an inspection, this should be discussed with the Team Manager/RoN where it is practicable to do so. If other issues are noted by NOPSEMA Inspectors, these issues may also be taken into consideration during the inspection, even though they may fall outside the original scope.
- 4.3.5 The planned inspection observations, findings and recommendations must be recorded in accordance with N-02300-SOP1423. The observations and findings must be presented to the titleholder's onshore or offshore representative as appropriate, and in the case of an inspection carried out at an offshore facility, the facility operator's representative, at an exit brief meeting held at the conclusion of the planned inspection.
- 4.3.6 NOPSEMA Inspectors conducting planned inspections must operate within the boundaries of the relevant NOPSEMA policies and procedures. This may mean NOPSEMA Inspectors will initiate enforcement activities during planned inspections where this is considered necessary in the opinion of the NOPSEMA Inspector.
- 4.3.7 Titleholders must be made aware that they have an opportunity to comment on the conduct of the planned inspection via verbal feedback during the exit meeting or through the feedback form on NOPSEMA's website (<http://www.nopsema.gov.au/safety/inspections/>).

4.4 Reporting of well integrity planned inspections

- 4.4.1 Immediately following a well integrity planned inspection the Lead Inspector must, as soon as practicable and in accordance with N-02300-SOP1423, prepare a written report relating to the inspection.
- 4.4.2 In the event that a planned well integrity inspection identifies deficiencies in the implemented well activity controls and systems, lack of the availability of well activity management systems, or any omissions or errors in the accepted well operations management plan in force, the inspectors must use the information gathered to justify recommendations.
- 4.4.3 All planned inspection, findings, conclusions, recommendations and titleholder's responses must be recorded in accordance with N- 02300-SOP1423.

5 Managing well integrity planned inspections

All well integrity planned inspection activities will be recorded and monitored using the Regulatory Management System (RMS).

6 Related documents

Standing Operating Procedures

- N-02300-SOP1681 – Well Integrity Planned Inspection
- N-02300-SOP1424 – Well Integrity Planned Inspection Preparation
- N-02300-SOP1094 – Conducting a Well Integrity Inspection
- N-02300-SOP1423 – Post Well Integrity Planned Inspection

**Work Instructions**

N-02300-WN1545 – Well Integrity Planned Inspection Candidate Selection

N-02300-WN1680 – Main Topics, Sub Topics, Inspection Prompts, Methods & Goals

Forms

N-02300-FM1070 – Planned Inspection Brief

N-02300-FM1515 – Well integrity Planned Inspection Entry & Exit Meeting Register and Notification of Entry

N-02300-FM1513 – Well Integrity Planned Inspection Exit Brief

N-02300-FM1514 – Well integrity Planned Inspection Report

Letters

N-02300-LT1425 – Well integrity Planned Inspection Notification

N-02300-LT1544 – Operator Notification of Well integrity Planned Inspection

N-02300-LT1531 – Well integrity Planned Inspection Report