



ESSO issued with OHS improvement notices for gas lift well configuration

Following a NOPSEMA investigation into an uncontrolled gas release on Esso Australia's (Esso) Flounder production facility in the Bass Strait, a common risk in the gas lift well configuration across twelve of Esso's facilities was identified. Consequently, NOPSEMA issued Esso the same improvement notice for each of the identified facilities.

The improvement notices issued to Esso require the operator to install the gas lift shut down valve as close as practicable to the well head within 180 days. When Esso takes this action, the notice will cease to have effect.

Throughout NOPSEMA's investigation, Esso assisted with the identification of other facilities, of which they are the operator, with the same gas lift well configuration.

NOPSEMA employs a robust assessment process, as well as strict compliance monitoring and enforcement programs, to ensure offshore oil and gas activities comply with Commonwealth law.

UPDATED 10 NOVEMBER 2017

Three improvement notices have been closed, the other nine notices remain open with the due date extended to 31 March 2018 following an application for extension by Esso. NOPSEMA is satisfied that a comprehensive prioritised capital work program is established and has commenced to address a number of wells across the remaining nine facilities.

UPDATED 18 JULY 2018

As of 26 June 2018, all 12 improvement notices were closed.

Of the nine notices due to be completed by 31 March 2018, seven were closed by their due date. Following applications for extension, NOPSEMA extended the due date for the remaining two notices to 31 May and 30 June 2018 respectively. In granting this extension, NOPSEMA was satisfied that Esso had, and was continuing, to undertake significant engineering works to comply with the notices. Each of the remaining two notices were closed by their due dates.

OHS Improvement Notice

Offshore Petroleum and Greenhouse Gas Storage Act 2006

Notice Number: 644

OHS IMPROVEMENT NOTICE

To: Esso Australia Pty Ltd

In conducting an OHS inspection in relation to the Flounder facility, I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the Act, am satisfied on reasonable grounds that the person named above as the responsible person is contravening, or has contravened and is likely to contravene again:

(a) clause 9 (2) (c) of Schedule 3 to the Act

at: Flounder facility

The reasons for my opinion are:

Failure of an instrument tubing line connected to Flounder A27 wellhead gas lift line resulted in the release of an estimated 1106 kg of hydrocarbon gas from the production annulus over a time period of 3.5 hours, elevating the risk on the facility during the release. Although initiation of the Surface Shut Down also closed the shutdown valve fitted to the gas lift line, this did not isolate the flow of hydrocarbon gas from the production annulus as the failed instrument line had been located on the gas lift line between the wellhead production annulus and gas lift line shutdown valve. This configuration created an unrestricted pathway from the failed instrument tubing line to the full volume of the production annulus which was not able to safely isolate the gas inventory of the production annulus.

Other gas lift wells on the Flounder facility were then identified to have either, small bore tubing, instrumentation and valve fittings fitted between the wellhead and gas lift line shutdown valve. As with A27, there are no effective barriers to isolate the hydrocarbon gas contained in the production annulus in the event of a failure in the integrity of one or more fittings.

As a result of this contravention I am satisfied that there is, or may be, the following risk to the health or safety of any person:

The potential for an uncontrolled release of a significant volume of hydrocarbon gas from the production annulus of gas lift production wells and the inability to isolate such a release on detection.

You are required to take action within 180 days of the date of this notice to prevent or reduce the risk.

The following action must be taken by the responsible person within the period specified above:

Esso Australia Pty Ltd are to reduce the risk of loss of annulus containment to ALARP, by ensuring that all wells on Flounder have gas lift line shutdown valves fitted as close as practicable to the wellhead and that this valve be activated with the same pneumatic signal as the surface safety valve to effect isolation of the gas lift line and any small-bore take-offs; or,

Implement such other controls as required to reduce risk to a level that is as low as reasonably practicable.

Signed:

[REDACTED]

NOPSEMA inspector

Dated: 13th April 2017

NOTES: (Please see back of notice)

When the required improvement has been completed, return this part of the notice to the following person at the address below:

Name:



Position: Manager Assessment and Inspection

Address: Send in electronic format via email to:
submissions@nopsema.gov.au

Telephone number: +61 8 6188 8700

Specify the action that has been taken to comply with this notice in the space below.

Improvement Notice No. **644** has been complied with by:

Signed: _____ Date: _____

NOTES:

1. Under clause 78 of Schedule 3 to the Act, a person who fails to ensure that this notice is complied with, to the extent that it relates to a matter over which the person has control, may be liable to a penalty of 300 penalty units or a civil penalty of 400 units.
2. This notice must be displayed in a prominent place at or near each workplace at which work affected by the notice is being performed and, must not be tampered with or removed before the notice has ceased to have effect.
3. If the notice is not issued by being given to the operator's representative at the facility, the responsible person (unless the responsible person is the titleholder) must cause a copy of the notice to be given to the operator's representative.
4. If the responsible person is the operator or an employer (other than the operator) of members of the workforce, the operator's representative at the facility must give a copy of the notice to each health and safety representative for a designated work group having group members performing work that is affected by the notice.
5. If the responsible person is the titleholder, as soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to the operator and, if the NOPSEMA inspector is at the facility when the notice issued, the operator's representative at the facility.
6. If the responsible person is the titleholder, but the inspector is not at the facility when the notice is issued, the operator must give a copy of the notice to the operator's representative at the facility.
7. As soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to, where applicable:
 - (a) the employer of an employee who is a member of the workforce if the notice is issued to the employee, and in connection with work performed by the employee, and
 - (b) the owner of any workplace plant, substance or thing that the notice relates to, unless the owner is the responsible person or an employer referred to in (a), and
 - (c) if the responsible person is the owner of any workplace, plant, substance or thing because of which the contravention has occurred, or is likely to occur: the operator of the facility, and if the employer of employees who work in that workplace or who use that plant, substance or thing is a person other than the operator—that employer; and
 - (d) the titleholder, if the responsible person is the operator, and the contravention relates, or is likely to relate to, the titleholders' well related obligations.
8. Under item 8 of subclause 80A(1) of Schedule 3 to the Act, any of the following persons may in writing request the reviewing authority to review the NOPSEMA inspector's decision:
 - the operator of the facility
 - the titleholder, if the notice is issued to a titleholder;
 - any other person to whom the notice has been issued;
 - an employer, if affected by the decision;
 - a relevant health and safety representative;
 - a relevant workforce representative, if requested by a member of the workforce affected by the decision;
 - a person who owns any workplace plant, substance or thing to which the NOPSEMA inspector's decision relates.
9. An improvement notice ceases to have effect when the responsible person takes the action specified in the notice.

OHS Improvement Notice

Offshore Petroleum and Greenhouse Gas Storage Act 2006

Notice Number: 645

OHS IMPROVEMENT NOTICE

To: Esso Australia Pty Ltd

In conducting an OHS inspection in relation to the Flounder facility, I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the Act, am satisfied on reasonable grounds that the person named above as the responsible person is contravening, or has contravened and is likely to contravene again:

(a) clause 9 (2) (c) of Schedule 3 to the Act

at: Bream A facility

The reasons for my opinion are:

Failure of an instrument tubing line connected to Flounder A27 wellhead gas lift line resulted in the release of an estimated 1106 kg of hydrocarbon gas from the production annulus over a time period of 3.5 hours, elevating the risk on the facility during the release. Although initiation of the Surface Shut Down also closed the shutdown valve fitted to the gas lift line, this did not isolate the flow of hydrocarbon gas from the production annulus as the failed instrument line had been located on the gas lift line between the wellhead production annulus and gas lift line shutdown valve. This configuration created an unrestricted pathway from the failed instrument tubing line to the full volume of the production annulus which was not able to safely isolate the gas inventory of the production annulus.

Other gas lift wells on the Bream A facility were then identified to have either, small bore tubing, instrumentation and valve fittings fitted between the wellhead and gas lift line shutdown valve. As with A27, there are no effective barriers to isolate the hydrocarbon gas contained in the production annulus in the event of a failure in the integrity of one or more fittings.

As a result of this contravention I am satisfied that there is, or may be, the following risk to the health or safety of any person:

The potential for an uncontrolled release of a significant volume of hydrocarbon gas from the production annulus of gas lift production wells and the inability to isolate such a release on detection.

You are required to take action within 180 days of the date of this notice to prevent or reduce the risk.

The following action must be taken by the responsible person within the period specified above:

Esso Australia Pty Ltd are to reduce the risk of loss of annulus containment to ALARP, by ensuring that all wells on Bream A have gas lift line shutdown valves fitted as close as practicable to the wellhead and that this valve be activated with the same pneumatic signal as the surface safety valve to effect isolation of the gas lift line and any small-bore take-offs; or,

Implement such other controls as required to reduce risk to a level that is as low as reasonably practicable.

Signed:

[REDACTED]

NOPSEMA inspector

Dated: 13th April 2017

NOTES: (Please see back of notice)

When the required improvement has been completed, return this part of the notice to the following person at the address below:

Name:



Position: Manager Assessment and Inspection

Address: Send in electronic format via email to:
submissions@nopsema.gov.au

Telephone number: +61 8 6188 8700

Specify the action that has been taken to comply with this notice in the space below.

Improvement Notice No. **645** has been complied with by:

Signed: _____ Date: _____

NOTES:

1. Under clause 78 of Schedule 3 to the Act, a person who fails to ensure that this notice is complied with, to the extent that it relates to a matter over which the person has control, may be liable to a penalty of 300 penalty units or a civil penalty of 400 units.
2. This notice must be displayed in a prominent place at or near each workplace at which work affected by the notice is being performed and, must not be tampered with or removed before the notice has ceased to have effect.
3. If the notice is not issued by being given to the operator's representative at the facility, the responsible person (unless the responsible person is the titleholder) must cause a copy of the notice to be given to the operator's representative.
4. If the responsible person is the operator or an employer (other than the operator) of members of the workforce, the operator's representative at the facility must give a copy of the notice to each health and safety representative for a designated work group having group members performing work that is affected by the notice.
5. If the responsible person is the titleholder, as soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to the operator and, if the NOPSEMA inspector is at the facility when the notice issued, the operator's representative at the facility.
6. If the responsible person is the titleholder, but the inspector is not at the facility when the notice is issued, the operator must give a copy of the notice to the operator's representative at the facility.
7. As soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to, where applicable:
 - (a) the employer of an employee who is a member of the workforce if the notice is issued to the employee, and in connection with work performed by the employee, and
 - (b) the owner of any workplace plant, substance or thing that the notice relates to, unless the owner is the responsible person or an employer referred to in (a), and
 - (c) if the responsible person is the owner of any workplace, plant, substance or thing because of which the contravention has occurred, or is likely to occur: the operator of the facility, and if the employer of employees who work in that workplace or who use that plant, substance or thing is a person other than the operator—that employer; and
 - (d) the titleholder, if the responsible person is the operator, and the contravention relates, or is likely to relate to, the titleholders' well related obligations.
8. Under item 8 of subclause 80A(1) of Schedule 3 to the Act, any of the following persons may in writing request the reviewing authority to review the NOPSEMA inspector's decision:
 - the operator of the facility
 - the titleholder, if the notice is issued to a titleholder;
 - any other person to whom the notice has been issued;
 - an employer, if affected by the decision;
 - a relevant health and safety representative;
 - a relevant workforce representative, if requested by a member of the workforce affected by the decision;
 - a person who owns any workplace plant, substance or thing to which the NOPSEMA inspector's decision relates.
9. An improvement notice ceases to have effect when the responsible person takes the action specified in the notice.

OHS Improvement Notice

Offshore Petroleum and Greenhouse Gas Storage Act 2006

Notice Number: 646

OHS IMPROVEMENT NOTICE

To: Esso Australia Pty Ltd

In conducting an OHS inspection in relation to the Flounder facility, I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the Act, am satisfied on reasonable grounds that the person named above as the responsible person is contravening, or has contravened and is likely to contravene again:

(a) clause 9 (2) (c) of Schedule 3 to the Act

at: Fortescue facility

The reasons for my opinion are:

Failure of an instrument tubing line connected to Flounder A27 wellhead gas lift line resulted in the release of an estimated 1106 kg of hydrocarbon gas from the production annulus over a time period of 3.5 hours, elevating the risk on the facility during the release. Although initiation of the Surface Shut Down also closed the shutdown valve fitted to the gas lift line, this did not isolate the flow of hydrocarbon gas from the production annulus as the failed instrument line had been located on the gas lift line between the wellhead production annulus and gas lift line shutdown valve. This configuration created an unrestricted pathway from the failed instrument tubing line to the full volume of the production annulus which was not able to safely isolate the gas inventory of the production annulus.

Other gas lift wells on the Fortescue facility were then identified to have either, small bore tubing, instrumentation and valve fittings fitted between the wellhead and gas lift line shutdown valve. As with A27, there are no effective barriers to isolate the hydrocarbon gas contained in the production annulus in the event of a failure in the integrity of one or more fittings.

As a result of this contravention I am satisfied that there is, or may be, the following risk to the health or safety of any person:

The potential for an uncontrolled release of a significant volume of hydrocarbon gas from the production annulus of gas lift production wells and the inability to isolate such a release on detection.

You are required to take action within 180 days of the date of this notice to prevent or reduce the risk.

The following action must be taken by the responsible person within the period specified above:

Esso Australia Pty Ltd are to reduce the risk of loss of annulus containment to ALARP, by ensuring that all wells on Fortescue have gas lift line shutdown valves fitted as close as practicable to the wellhead and that this valve be activated with the same pneumatic signal as the surface safety valve to effect isolation of the gas lift line and any small-bore take-offs; or,

Implement such other controls as required to reduce risk to a level that is as low as reasonably practicable.

Signed:

[REDACTED]

NOPSEMA inspector

Dated: 13th April 2017

NOTES: (Please see back of notice)

When the required improvement has been completed, return this part of the notice to the following person at the address below:

Name:



Position: Manager Assessment and Inspection

Address: Send in electronic format via email to:
submissions@nopsema.gov.au

Telephone number: +61 8 6188 8700

Specify the action that has been taken to comply with this notice in the space below.

Improvement Notice No. **646** has been complied with by:

Signed: _____ Date: _____

NOTES:

1. Under clause 78 of Schedule 3 to the Act, a person who fails to ensure that this notice is complied with, to the extent that it relates to a matter over which the person has control, may be liable to a penalty of 300 penalty units or a civil penalty of 400 units.
2. This notice must be displayed in a prominent place at or near each workplace at which work affected by the notice is being performed and, must not be tampered with or removed before the notice has ceased to have effect.
3. If the notice is not issued by being given to the operator's representative at the facility, the responsible person (unless the responsible person is the titleholder) must cause a copy of the notice to be given to the operator's representative.
4. If the responsible person is the operator or an employer (other than the operator) of members of the workforce, the operator's representative at the facility must give a copy of the notice to each health and safety representative for a designated work group having group members performing work that is affected by the notice.
5. If the responsible person is the titleholder, as soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to the operator and, if the NOPSEMA inspector is at the facility when the notice issued, the operator's representative at the facility.
6. If the responsible person is the titleholder, but the inspector is not at the facility when the notice is issued, the operator must give a copy of the notice to the operator's representative at the facility.
7. As soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to, where applicable:
 - (a) the employer of an employee who is a member of the workforce if the notice is issued to the employee, and in connection with work performed by the employee, and
 - (b) the owner of any workplace plant, substance or thing that the notice relates to, unless the owner is the responsible person or an employer referred to in (a), and
 - (c) if the responsible person is the owner of any workplace, plant, substance or thing because of which the contravention has occurred, or is likely to occur: the operator of the facility, and if the employer of employees who work in that workplace or who use that plant, substance or thing is a person other than the operator—that employer; and
 - (d) the titleholder, if the responsible person is the operator, and the contravention relates, or is likely to relate to, the titleholders' well related obligations.
8. Under item 8 of subclause 80A(1) of Schedule 3 to the Act, any of the following persons may in writing request the reviewing authority to review the NOPSEMA inspector's decision:
 - the operator of the facility
 - the titleholder, if the notice is issued to a titleholder;
 - any other person to whom the notice has been issued;
 - an employer, if affected by the decision;
 - a relevant health and safety representative;
 - a relevant workforce representative, if requested by a member of the workforce affected by the decision;
 - a person who owns any workplace plant, substance or thing to which the NOPSEMA inspector's decision relates.
9. An improvement notice ceases to have effect when the responsible person takes the action specified in the notice.

OHS Improvement Notice

Offshore Petroleum and Greenhouse Gas Storage Act 2006

Notice Number: 647

OHS IMPROVEMENT NOTICE

To: Esso Australia Pty Ltd

In conducting an OHS inspection in relation to the Flounder facility, I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the Act, am satisfied on reasonable grounds that the person named above as the responsible person is contravening, or has contravened and is likely to contravene again:

(a) clause 9 (2) (c) of Schedule 3 to the Act

at: Cobia facility

The reasons for my opinion are:

Failure of an instrument tubing line connected to Flounder A27 wellhead gas lift line resulted in the release of an estimated 1106 kg of hydrocarbon gas from the production annulus over a time period of 3.5 hours, elevating the risk on the facility during the release. Although initiation of the Surface Shut Down also closed the shutdown valve fitted to the gas lift line, this did not isolate the flow of hydrocarbon gas from the production annulus as the failed instrument line had been located on the gas lift line between the wellhead production annulus and gas lift line shutdown valve. This configuration created an unrestricted pathway from the failed instrument tubing line to the full volume of the production annulus which was not able to safely isolate the gas inventory of the production annulus.

Other gas lift wells on the Cobia facility were then identified to have either, small bore tubing, instrumentation and valve fittings fitted between the wellhead and gas lift line shutdown valve. As with A27, there are no effective barriers to isolate the hydrocarbon gas contained in the production annulus in the event of a failure in the integrity of one or more fittings.

As a result of this contravention I am satisfied that there is, or may be, the following risk to the health or safety of any person:

The potential for an uncontrolled release of a significant volume of hydrocarbon gas from the production annulus of gas lift production wells and the inability to isolate such a release on detection.

You are required to take action within 180 days of the date of this notice to prevent or reduce the risk.

The following action must be taken by the responsible person within the period specified above:

Esso Australia Pty Ltd are to reduce the risk of loss of annulus containment to ALARP, by ensuring that all wells on Cobia have gas lift line shutdown valves fitted as close as practicable to the wellhead and that this valve be activated with the same pneumatic signal as the surface safety valve to effect isolation of the gas lift line and any small-bore take-offs; or,

Implement such other controls as required to reduce risk to a level that is as low as reasonably practicable.

Signed:

[REDACTED]
NOPSEMA inspector

Dated: 13th April 2017

NOTES: (Please see back of notice)

When the required improvement has been completed, return this part of the notice to the following person at the address below:

Name:



Position: Manager Assessment and Inspection

Address: Send in electronic format via email to:
submissions@nopsema.gov.au

Telephone number: +61 8 6188 8700

Specify the action that has been taken to comply with this notice in the space below.

Improvement Notice No. **647** has been complied with by:

Signed: _____ Date: _____

NOTES:

1. Under clause 78 of Schedule 3 to the Act, a person who fails to ensure that this notice is complied with, to the extent that it relates to a matter over which the person has control, may be liable to a penalty of 300 penalty units or a civil penalty of 400 units.
2. This notice must be displayed in a prominent place at or near each workplace at which work affected by the notice is being performed and, must not be tampered with or removed before the notice has ceased to have effect.
3. If the notice is not issued by being given to the operator's representative at the facility, the responsible person (unless the responsible person is the titleholder) must cause a copy of the notice to be given to the operator's representative.
4. If the responsible person is the operator or an employer (other than the operator) of members of the workforce, the operator's representative at the facility must give a copy of the notice to each health and safety representative for a designated work group having group members performing work that is affected by the notice.
5. If the responsible person is the titleholder, as soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to the operator and, if the NOPSEMA inspector is at the facility when the notice issued, the operator's representative at the facility.
6. If the responsible person is the titleholder, but the inspector is not at the facility when the notice is issued, the operator must give a copy of the notice to the operator's representative at the facility.
7. As soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to, where applicable:
 - (a) the employer of an employee who is a member of the workforce if the notice is issued to the employee, and in connection with work performed by the employee, and
 - (b) the owner of any workplace plant, substance or thing that the notice relates to, unless the owner is the responsible person or an employer referred to in (a), and
 - (c) if the responsible person is the owner of any workplace, plant, substance or thing because of which the contravention has occurred, or is likely to occur: the operator of the facility, and if the employer of employees who work in that workplace or who use that plant, substance or thing is a person other than the operator—that employer; and
 - (d) the titleholder, if the responsible person is the operator, and the contravention relates, or is likely to relate to, the titleholders' well related obligations.
8. Under item 8 of subclause 80A(1) of Schedule 3 to the Act, any of the following persons may in writing request the reviewing authority to review the NOPSEMA inspector's decision:
 - the operator of the facility
 - the titleholder, if the notice is issued to a titleholder;
 - any other person to whom the notice has been issued;
 - an employer, if affected by the decision;
 - a relevant health and safety representative;
 - a relevant workforce representative, if requested by a member of the workforce affected by the decision;
 - a person who owns any workplace plant, substance or thing to which the NOPSEMA inspector's decision relates.
9. An improvement notice ceases to have effect when the responsible person takes the action specified in the notice.

OHS Improvement Notice

Offshore Petroleum and Greenhouse Gas Storage Act 2006

Notice Number: 648

OHS IMPROVEMENT NOTICE

To: Esso Australia Pty Ltd

In conducting an OHS inspection in relation to the Flounder facility, I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the Act, am satisfied on reasonable grounds that the person named above as the responsible person is contravening, or has contravened and is likely to contravene again:

(a) clause 9 (2) (c) of Schedule 3 to the Act

at: Halibut facility

The reasons for my opinion are:

Failure of an instrument tubing line connected to Flounder A27 wellhead gas lift line resulted in the release of an estimated 1106 kg of hydrocarbon gas from the production annulus over a time period of 3.5 hours, elevating the risk on the facility during the release. Although initiation of the Surface Shut Down also closed the shutdown valve fitted to the gas lift line, this did not isolate the flow of hydrocarbon gas from the production annulus as the failed instrument line had been located on the gas lift line between the wellhead production annulus and gas lift line shutdown valve. This configuration created an unrestricted pathway from the failed instrument tubing line to the full volume of the production annulus which was not able to safely isolate the gas inventory of the production annulus.

Other gas lift wells on the Halibut facility were then identified to have either, small bore tubing, instrumentation and valve fittings fitted between the wellhead and gas lift line shutdown valve. As with A27, there are no effective barriers to isolate the hydrocarbon gas contained in the production annulus in the event of a failure in the integrity of one or more fittings.

As a result of this contravention I am satisfied that there is, or may be, the following risk to the health or safety of any person:

The potential for an uncontrolled release of a significant volume of hydrocarbon gas from the production annulus of gas lift production wells and the inability to isolate such a release on detection.

You are required to take action within 180 days of the date of this notice to prevent or reduce the risk.

The following action must be taken by the responsible person within the period specified above:

Esso Australia Pty Ltd are to reduce the risk of loss of annulus containment to ALARP, by ensuring that all wells on Halibut have gas lift line shutdown valves fitted as close as practicable to the wellhead and that this valve be activated with the same pneumatic signal as the surface safety valve to effect isolation of the gas lift line and any small-bore take-offs; or,

Implement such other controls as required to reduce risk to a level that is as low as reasonably practicable.

Signed:

[REDACTED]
NOPSEMA inspector

Dated: 13th April 2017

NOTES: (Please see back of notice)

When the required improvement has been completed, return this part of the notice to the following person at the address below:

Name:



Position: Manager Assessment and Inspection

Address: Send in electronic format via email to:
submissions@nopsema.gov.au

Telephone number: +61 8 6188 8700

Specify the action that has been taken to comply with this notice in the space below.

Improvement Notice No. **648** has been complied with by:

Signed: _____ Date: _____

NOTES:

1. Under clause 78 of Schedule 3 to the Act, a person who fails to ensure that this notice is complied with, to the extent that it relates to a matter over which the person has control, may be liable to a penalty of 300 penalty units or a civil penalty of 400 units.
2. This notice must be displayed in a prominent place at or near each workplace at which work affected by the notice is being performed and, must not be tampered with or removed before the notice has ceased to have effect.
3. If the notice is not issued by being given to the operator's representative at the facility, the responsible person (unless the responsible person is the titleholder) must cause a copy of the notice to be given to the operator's representative.
4. If the responsible person is the operator or an employer (other than the operator) of members of the workforce, the operator's representative at the facility must give a copy of the notice to each health and safety representative for a designated work group having group members performing work that is affected by the notice.
5. If the responsible person is the titleholder, as soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to the operator and, if the NOPSEMA inspector is at the facility when the notice issued, the operator's representative at the facility.
6. If the responsible person is the titleholder, but the inspector is not at the facility when the notice is issued, the operator must give a copy of the notice to the operator's representative at the facility.
7. As soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to, where applicable:
 - (a) the employer of an employee who is a member of the workforce if the notice is issued to the employee, and in connection with work performed by the employee, and
 - (b) the owner of any workplace plant, substance or thing that the notice relates to, unless the owner is the responsible person or an employer referred to in (a), and
 - (c) if the responsible person is the owner of any workplace, plant, substance or thing because of which the contravention has occurred, or is likely to occur: the operator of the facility, and if the employer of employees who work in that workplace or who use that plant, substance or thing is a person other than the operator—that employer; and
 - (d) the titleholder, if the responsible person is the operator, and the contravention relates, or is likely to relate to, the titleholders' well related obligations.
8. Under item 8 of subclause 80A(1) of Schedule 3 to the Act, any of the following persons may in writing request the reviewing authority to review the NOPSEMA inspector's decision:
 - the operator of the facility
 - the titleholder, if the notice is issued to a titleholder;
 - any other person to whom the notice has been issued;
 - an employer, if affected by the decision;
 - a relevant health and safety representative;
 - a relevant workforce representative, if requested by a member of the workforce affected by the decision;
 - a person who owns any workplace plant, substance or thing to which the NOPSEMA inspector's decision relates.
9. An improvement notice ceases to have effect when the responsible person takes the action specified in the notice.

OHS Improvement Notice

Offshore Petroleum and Greenhouse Gas Storage Act 2006

Notice Number: 649

OHS IMPROVEMENT NOTICE

To: Esso Australia Pty Ltd

In conducting an OHS inspection in relation to the Flounder facility, I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the Act, am satisfied on reasonable grounds that the person named above as the responsible person is contravening, or has contravened and is likely to contravene again:

(a) clause 9 (2) (c) of Schedule 3 to the Act

at: Kingfish A facility

The reasons for my opinion are:

Failure of an instrument tubing line connected to Flounder A27 wellhead gas lift line resulted in the release of an estimated 1106 kg of hydrocarbon gas from the production annulus over a time period of 3.5 hours, elevating the risk on the facility during the release. Although initiation of the Surface Shut Down also closed the shutdown valve fitted to the gas lift line, this did not isolate the flow of hydrocarbon gas from the production annulus as the failed instrument line had been located on the gas lift line between the wellhead production annulus and gas lift line shutdown valve. This configuration created an unrestricted pathway from the failed instrument tubing line to the full volume of the production annulus which was not able to safely isolate the gas inventory of the production annulus.

Other gas lift wells on the Kingfish A facility were then identified to have either, small bore tubing, instrumentation and valve fittings fitted between the wellhead and gas lift line shutdown valve. As with A27, there are no effective barriers to isolate the hydrocarbon gas contained in the production annulus in the event of a failure in the integrity of one or more fittings.

As a result of this contravention I am satisfied that there is, or may be, the following risk to the health or safety of any person:

The potential for an uncontrolled release of a significant volume of hydrocarbon gas from the production annulus of gas lift production wells and the inability to isolate such a release on detection.

You are required to take action within 180 days of the date of this notice to prevent or reduce the risk.

The following action must be taken by the responsible person within the period specified above:

Esso Australia Pty Ltd are to reduce the risk of loss of annulus containment to ALARP, by ensuring that all wells on Kingfish A have gas lift line shutdown valves fitted as close as practicable to the wellhead and that this valve be activated with the same pneumatic signal as the surface safety valve to effect isolation of the gas lift line and any small-bore take-offs; or,

Implement such other controls as required to reduce risk to a level that is as low as reasonably practicable.

Signed:

[REDACTED]

NOPSEMA inspector

Dated: 13th April 2017

NOTES: (Please see back of notice)

When the required improvement has been completed, return this part of the notice to the following person at the address below:

Name:



Position: Manager Assessment and Inspection

Address: Send in electronic format via email to:
submissions@nopsema.gov.au

Telephone number: +61 8 6188 8700

Specify the action that has been taken to comply with this notice in the space below.

Improvement Notice No. **649** has been complied with by:

Signed: _____ Date: _____

NOTES:

1. Under clause 78 of Schedule 3 to the Act, a person who fails to ensure that this notice is complied with, to the extent that it relates to a matter over which the person has control, may be liable to a penalty of 300 penalty units or a civil penalty of 400 units.
2. This notice must be displayed in a prominent place at or near each workplace at which work affected by the notice is being performed and, must not be tampered with or removed before the notice has ceased to have effect.
3. If the notice is not issued by being given to the operator's representative at the facility, the responsible person (unless the responsible person is the titleholder) must cause a copy of the notice to be given to the operator's representative.
4. If the responsible person is the operator or an employer (other than the operator) of members of the workforce, the operator's representative at the facility must give a copy of the notice to each health and safety representative for a designated work group having group members performing work that is affected by the notice.
5. If the responsible person is the titleholder, as soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to the operator and, if the NOPSEMA inspector is at the facility when the notice issued, the operator's representative at the facility.
6. If the responsible person is the titleholder, but the inspector is not at the facility when the notice is issued, the operator must give a copy of the notice to the operator's representative at the facility.
7. As soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to, where applicable:
 - (a) the employer of an employee who is a member of the workforce if the notice is issued to the employee, and in connection with work performed by the employee, and
 - (b) the owner of any workplace plant, substance or thing that the notice relates to, unless the owner is the responsible person or an employer referred to in (a), and
 - (c) if the responsible person is the owner of any workplace, plant, substance or thing because of which the contravention has occurred, or is likely to occur: the operator of the facility, and if the employer of employees who work in that workplace or who use that plant, substance or thing is a person other than the operator—that employer; and
 - (d) the titleholder, if the responsible person is the operator, and the contravention relates, or is likely to relate to, the titleholders' well related obligations.
8. Under item 8 of subclause 80A(1) of Schedule 3 to the Act, any of the following persons may in writing request the reviewing authority to review the NOPSEMA inspector's decision:
 - the operator of the facility
 - the titleholder, if the notice is issued to a titleholder;
 - any other person to whom the notice has been issued;
 - an employer, if affected by the decision;
 - a relevant health and safety representative;
 - a relevant workforce representative, if requested by a member of the workforce affected by the decision;
 - a person who owns any workplace plant, substance or thing to which the NOPSEMA inspector's decision relates.
9. An improvement notice ceases to have effect when the responsible person takes the action specified in the notice.

OHS Improvement Notice

Offshore Petroleum and Greenhouse Gas Storage Act 2006

Notice Number: 650

OHS IMPROVEMENT NOTICE

To: Esso Australia Pty Ltd

In conducting an OHS inspection in relation to the Flounder facility, I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the Act, am satisfied on reasonable grounds that the person named above as the responsible person is contravening, or has contravened and is likely to contravene again:

(a) clause 9 (2) (c) of Schedule 3 to the Act

at: Kingfish B facility

The reasons for my opinion are:

Failure of an instrument tubing line connected to Flounder A27 wellhead gas lift line resulted in the release of an estimated 1106 kg of hydrocarbon gas from the production annulus over a time period of 3.5 hours, elevating the risk on the facility during the release. Although initiation of the Surface Shut Down also closed the shutdown valve fitted to the gas lift line, this did not isolate the flow of hydrocarbon gas from the production annulus as the failed instrument line had been located on the gas lift line between the wellhead production annulus and gas lift line shutdown valve. This configuration created an unrestricted pathway from the failed instrument tubing line to the full volume of the production annulus which was not able to safely isolate the gas inventory of the production annulus.

Other gas lift wells on the Kingfish B facility were then identified to have either, small bore tubing, instrumentation and valve fittings fitted between the wellhead and gas lift line shutdown valve. As with A27, there are no effective barriers to isolate the hydrocarbon gas contained in the production annulus in the event of a failure in the integrity of one or more fittings.

As a result of this contravention I am satisfied that there is, or may be, the following risk to the health or safety of any person:

The potential for an uncontrolled release of a significant volume of hydrocarbon gas from the production annulus of gas lift production wells and the inability to isolate such a release on detection.

You are required to take action within 180 days of the date of this notice to prevent or reduce the risk.

The following action must be taken by the responsible person within the period specified above:

Esso Australia Pty Ltd are to reduce the risk of loss of annulus containment to ALARP, by ensuring that all wells on Kingfish B have gas lift line shutdown valves fitted as close as practicable to the wellhead and that this valve be activated with the same pneumatic signal as the surface safety valve to effect isolation of the gas lift line and any small-bore take-offs; or,

Implement such other controls as required to reduce risk to a level that is as low as reasonably practicable.

Signed:

[REDACTED]
NOPSEMA inspector

**Dated: 13th April
2017**

NOTES: (Please see back of notice)

When the required improvement has been completed, return this part of the notice to the following person at the address below:

Name:



Position: Manager Assessment and Inspection

Address: Send in electronic format via email to:
submissions@nopsema.gov.au

Telephone number: +61 8 6188 8700

Specify the action that has been taken to comply with this notice in the space below.

Improvement Notice No. **650** has been complied with by:

Signed: _____ Date: _____

NOTES:

1. Under clause 78 of Schedule 3 to the Act, a person who fails to ensure that this notice is complied with, to the extent that it relates to a matter over which the person has control, may be liable to a penalty of 300 penalty units or a civil penalty of 400 units.
2. This notice must be displayed in a prominent place at or near each workplace at which work affected by the notice is being performed and, must not be tampered with or removed before the notice has ceased to have effect.
3. If the notice is not issued by being given to the operator's representative at the facility, the responsible person (unless the responsible person is the titleholder) must cause a copy of the notice to be given to the operator's representative.
4. If the responsible person is the operator or an employer (other than the operator) of members of the workforce, the operator's representative at the facility must give a copy of the notice to each health and safety representative for a designated work group having group members performing work that is affected by the notice.
5. If the responsible person is the titleholder, as soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to the operator and, if the NOPSEMA inspector is at the facility when the notice issued, the operator's representative at the facility.
6. If the responsible person is the titleholder, but the inspector is not at the facility when the notice is issued, the operator must give a copy of the notice to the operator's representative at the facility.
7. As soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to, where applicable:
 - (a) the employer of an employee who is a member of the workforce if the notice is issued to the employee, and in connection with work performed by the employee, and
 - (b) the owner of any workplace plant, substance or thing that the notice relates to, unless the owner is the responsible person or an employer referred to in (a), and
 - (c) if the responsible person is the owner of any workplace, plant, substance or thing because of which the contravention has occurred, or is likely to occur: the operator of the facility, and if the employer of employees who work in that workplace or who use that plant, substance or thing is a person other than the operator—that employer; and
 - (d) the titleholder, if the responsible person is the operator, and the contravention relates, or is likely to relate to, the titleholders' well related obligations.
8. Under item 8 of subclause 80A(1) of Schedule 3 to the Act, any of the following persons may in writing request the reviewing authority to review the NOPSEMA inspector's decision:
 - the operator of the facility
 - the titleholder, if the notice is issued to a titleholder;
 - any other person to whom the notice has been issued;
 - an employer, if affected by the decision;
 - a relevant health and safety representative;
 - a relevant workforce representative, if requested by a member of the workforce affected by the decision;
 - a person who owns any workplace plant, substance or thing to which the NOPSEMA inspector's decision relates.
9. An improvement notice ceases to have effect when the responsible person takes the action specified in the notice.

OHS Improvement Notice

Offshore Petroleum and Greenhouse Gas Storage Act 2006

Notice Number: 651

OHS IMPROVEMENT NOTICE

To: Esso Australia Pty Ltd

In conducting an OHS inspection in relation to the Flounder facility, I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the Act, am satisfied on reasonable grounds that the person named above as the responsible person is contravening, or has contravened and is likely to contravene again:

(a) clause 9 (2) (c) of Schedule 3 to the Act

at: Mackerel facility

The reasons for my opinion are:

Failure of an instrument tubing line connected to Flounder A27 wellhead gas lift line resulted in the release of an estimated 1106 kg of hydrocarbon gas from the production annulus over a time period of 3.5 hours, elevating the risk on the facility during the release. Although initiation of the Surface Shut Down also closed the shutdown valve fitted to the gas lift line, this did not isolate the flow of hydrocarbon gas from the production annulus as the failed instrument line had been located on the gas lift line between the wellhead production annulus and gas lift line shutdown valve. This configuration created an unrestricted pathway from the failed instrument tubing line to the full volume of the production annulus which was not able to safely isolate the gas inventory of the production annulus.

Other gas lift wells on the Mackerel facility were then identified to have either, small bore tubing, instrumentation and valve fittings fitted between the wellhead and gas lift line shutdown valve. As with A27, there are no effective barriers to isolate the hydrocarbon gas contained in the production annulus in the event of a failure in the integrity of one or more fittings.

As a result of this contravention I am satisfied that there is, or may be, the following risk to the health or safety of any person:

The potential for an uncontrolled release of a significant volume of hydrocarbon gas from the production annulus of gas lift production wells and the inability to isolate such a release on detection.

You are required to take action within 180 days of the date of this notice to prevent or reduce the risk.

The following action must be taken by the responsible person within the period specified above:

Esso Australia Pty Ltd are to reduce the risk of loss of annulus containment to ALARP, by ensuring that all wells on Mackerel have gas lift line shutdown valves fitted as close as practicable to the wellhead and that this valve be activated with the same pneumatic signal as the surface safety valve to effect isolation of the gas lift line and any small-bore take-offs; or,

Implement such other controls as required to reduce risk to a level that is as low as reasonably practicable.

Signed:

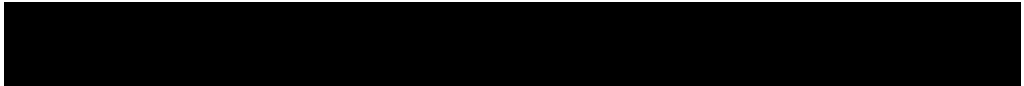
[REDACTED]
NOPSEMA inspector

Dated: 13th April 2017

NOTES: (Please see back of notice)

When the required improvement has been completed, return this part of the notice to the following person at the address below:

Name:



Position: Manager Assessment and Inspection

Address: Send in electronic format via email to:
submissions@nopsema.gov.au

Telephone number: +61 8 6188 8700

Specify the action that has been taken to comply with this notice in the space below.

Improvement Notice No. **651** has been complied with by:

Signed: _____ Date: _____

NOTES:

1. Under clause 78 of Schedule 3 to the Act, a person who fails to ensure that this notice is complied with, to the extent that it relates to a matter over which the person has control, may be liable to a penalty of 300 penalty units or a civil penalty of 400 units.
2. This notice must be displayed in a prominent place at or near each workplace at which work affected by the notice is being performed and, must not be tampered with or removed before the notice has ceased to have effect.
3. If the notice is not issued by being given to the operator's representative at the facility, the responsible person (unless the responsible person is the titleholder) must cause a copy of the notice to be given to the operator's representative.
4. If the responsible person is the operator or an employer (other than the operator) of members of the workforce, the operator's representative at the facility must give a copy of the notice to each health and safety representative for a designated work group having group members performing work that is affected by the notice.
5. If the responsible person is the titleholder, as soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to the operator and, if the NOPSEMA inspector is at the facility when the notice issued, the operator's representative at the facility.
6. If the responsible person is the titleholder, but the inspector is not at the facility when the notice is issued, the operator must give a copy of the notice to the operator's representative at the facility.
7. As soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to, where applicable:
 - (a) the employer of an employee who is a member of the workforce if the notice is issued to the employee, and in connection with work performed by the employee, and
 - (b) the owner of any workplace plant, substance or thing that the notice relates to, unless the owner is the responsible person or an employer referred to in (a), and
 - (c) if the responsible person is the owner of any workplace, plant, substance or thing because of which the contravention has occurred, or is likely to occur: the operator of the facility, and if the employer of employees who work in that workplace or who use that plant, substance or thing is a person other than the operator—that employer; and
 - (d) the titleholder, if the responsible person is the operator, and the contravention relates, or is likely to relate to, the titleholders' well related obligations.
8. Under item 8 of subclause 80A(1) of Schedule 3 to the Act, any of the following persons may in writing request the reviewing authority to review the NOPSEMA inspector's decision:
 - the operator of the facility
 - the titleholder, if the notice is issued to a titleholder;
 - any other person to whom the notice has been issued;
 - an employer, if affected by the decision;
 - a relevant health and safety representative;
 - a relevant workforce representative, if requested by a member of the workforce affected by the decision;
 - a person who owns any workplace plant, substance or thing to which the NOPSEMA inspector's decision relates.
9. An improvement notice ceases to have effect when the responsible person takes the action specified in the notice.

OHS Improvement Notice

Offshore Petroleum and Greenhouse Gas Storage Act 2006

Notice Number: 652

OHS IMPROVEMENT NOTICE

To: Esso Australia Pty Ltd

In conducting an OHS inspection in relation to the Flounder facility, I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the Act, am satisfied on reasonable grounds that the person named above as the responsible person is contravening, or has contravened and is likely to contravene again:

(a) clause 9 (2) (c) of Schedule 3 to the Act

at: Bream B facility

The reasons for my opinion are:

Failure of an instrument tubing line connected to Flounder A27 wellhead gas lift line resulted in the release of an estimated 1106 kg of hydrocarbon gas from the production annulus over a time period of 3.5 hours, elevating the risk on the facility during the release. Although initiation of the Surface Shut Down also closed the shutdown valve fitted to the gas lift line, this did not isolate the flow of hydrocarbon gas from the production annulus as the failed instrument line had been located on the gas lift line between the wellhead production annulus and gas lift line shutdown valve. This configuration created an unrestricted pathway from the failed instrument tubing line to the full volume of the production annulus which was not able to safely isolate the gas inventory of the production annulus.

Other gas lift wells on the Bream B facility were then identified to have either, small bore tubing, instrumentation and valve fittings fitted between the wellhead and gas lift line shutdown valve. As with A27, there are no effective barriers to isolate the hydrocarbon gas contained in the production annulus in the event of a failure in the integrity of one or more fittings.

As a result of this contravention I am satisfied that there is, or may be, the following risk to the health or safety of any person:

The potential for an uncontrolled release of a significant volume of hydrocarbon gas from the production annulus of gas lift production wells and the inability to isolate such a release on detection.

You are required to take action within 180 days of the date of this notice to prevent or reduce the risk.

The following action must be taken by the responsible person within the period specified above:

Esso Australia Pty Ltd are to reduce the risk of loss of annulus containment to ALARP, by ensuring that all wells on Bream B have gas lift line shutdown valves fitted as close as practicable to the wellhead and that this valve be activated with the same pneumatic signal as the surface safety valve to effect isolation of the gas lift line and any small-bore take-offs; or,

Implement such other controls as required to reduce risk to a level that is as low as reasonably practicable.

Signed:

[REDACTED]

NOPSEMA inspector

Dated: 27th April 2017

NOTES: (Please see back of notice)

When the required improvement has been completed, return this part of the notice to the following person at the address below:

Name:



Position: Manager Assessment and Inspection

Address: Send in electronic format via email to:
submissions@nopsema.gov.au

Telephone number: +61 8 6188 8700

Specify the action that has been taken to comply with this notice in the space below.

Improvement Notice No. **652** has been complied with by:

Signed: _____ Date: _____

NOTES:

1. Under clause 78 of Schedule 3 to the Act, a person who fails to ensure that this notice is complied with, to the extent that it relates to a matter over which the person has control, may be liable to a penalty of 300 penalty units or a civil penalty of 400 units.
2. This notice must be displayed in a prominent place at or near each workplace at which work affected by the notice is being performed and, must not be tampered with or removed before the notice has ceased to have effect.
3. If the notice is not issued by being given to the operator's representative at the facility, the responsible person (unless the responsible person is the titleholder) must cause a copy of the notice to be given to the operator's representative.
4. If the responsible person is the operator or an employer (other than the operator) of members of the workforce, the operator's representative at the facility must give a copy of the notice to each health and safety representative for a designated work group having group members performing work that is affected by the notice.
5. If the responsible person is the titleholder, as soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to the operator and, if the NOPSEMA inspector is at the facility when the notice issued, the operator's representative at the facility.
6. If the responsible person is the titleholder, but the inspector is not at the facility when the notice is issued, the operator must give a copy of the notice to the operator's representative at the facility.
7. As soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to, where applicable:
 - (a) the employer of an employee who is a member of the workforce if the notice is issued to the employee, and in connection with work performed by the employee, and
 - (b) the owner of any workplace plant, substance or thing that the notice relates to, unless the owner is the responsible person or an employer referred to in (a), and
 - (c) if the responsible person is the owner of any workplace, plant, substance or thing because of which the contravention has occurred, or is likely to occur: the operator of the facility, and if the employer of employees who work in that workplace or who use that plant, substance or thing is a person other than the operator—that employer; and
 - (d) the titleholder, if the responsible person is the operator, and the contravention relates, or is likely to relate to, the titleholders' well related obligations.
8. Under item 8 of subclause 80A(1) of Schedule 3 to the Act, any of the following persons may in writing request the reviewing authority to review the NOPSEMA inspector's decision:
 - the operator of the facility
 - the titleholder, if the notice is issued to a titleholder;
 - any other person to whom the notice has been issued;
 - an employer, if affected by the decision;
 - a relevant health and safety representative;
 - a relevant workforce representative, if requested by a member of the workforce affected by the decision;
 - a person who owns any workplace plant, substance or thing to which the NOPSEMA inspector's decision relates.
9. An improvement notice ceases to have effect when the responsible person takes the action specified in the notice.

OHS Improvement Notice

Offshore Petroleum and Greenhouse Gas Storage Act 2006

Notice Number: 653

OHS IMPROVEMENT NOTICE

To: Esso Australia Pty Ltd

In conducting an OHS inspection in relation to the Flounder facility, I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the Act, am satisfied on reasonable grounds that the person named above as the responsible person is contravening, or has contravened and is likely to contravene again:

(a) clause 9 (2) (c) of Schedule 3 to the Act

at: Barracouta facility

The reasons for my opinion are:

Failure of an instrument tubing line connected to Flounder A27 wellhead gas lift line resulted in the release of an estimated 1106 kg of hydrocarbon gas from the production annulus over a time period of 3.5 hours, elevating the risk on the facility during the release. Although initiation of the Surface Shut Down also closed the shutdown valve fitted to the gas lift line, this did not isolate the flow of hydrocarbon gas from the production annulus as the failed instrument line had been located on the gas lift line between the wellhead production annulus and gas lift line shutdown valve. This configuration created an unrestricted pathway from the failed instrument tubing line to the full volume of the production annulus which was not able to safely isolate the gas inventory of the production annulus.

Other gas lift wells on the Barracouta facility were then identified to have either, small bore tubing, instrumentation and valve fittings fitted between the wellhead and gas lift line shutdown valve. As with A27, there are no effective barriers to isolate the hydrocarbon gas contained in the production annulus in the event of a failure in the integrity of one or more fittings.

As a result of this contravention I am satisfied that there is, or may be, the following risk to the health or safety of any person:

The potential for an uncontrolled release of a significant volume of hydrocarbon gas from the production annulus of gas lift production wells and the inability to isolate such a release on detection.

You are required to take action within 180 days of the date of this notice to prevent or reduce the risk.

The following action must be taken by the responsible person within the period specified above:

Esso Australia Pty Ltd are to reduce the risk of loss of annulus containment to ALARP, by ensuring that all wells on Barracouta have gas lift line shutdown valves fitted as close as practicable to the wellhead and that this valve be activated with the same pneumatic signal as the surface safety valve to effect isolation of the gas lift line and any small-bore take-offs; or,

Implement such other controls as required to reduce risk to a level that is as low as reasonably practicable.

Signed:

[REDACTED]

NOPSEMA inspector

Dated: 27th April 2017

NOTES: (Please see back of notice)

When the required improvement has been completed, return this part of the notice to the following person at the address below:

Name:



Position: Manager Assessment and Inspection

Address: Send in electronic format via email to:
submissions@nopsema.gov.au

Telephone number: +61 8 6188 8700

Specify the action that has been taken to comply with this notice in the space below.

Improvement Notice No. **653** has been complied with by:

Signed: _____ Date: _____

NOTES:

1. Under clause 78 of Schedule 3 to the Act, a person who fails to ensure that this notice is complied with, to the extent that it relates to a matter over which the person has control, may be liable to a penalty of 300 penalty units or a civil penalty of 400 units.
2. This notice must be displayed in a prominent place at or near each workplace at which work affected by the notice is being performed and, must not be tampered with or removed before the notice has ceased to have effect.
3. If the notice is not issued by being given to the operator's representative at the facility, the responsible person (unless the responsible person is the titleholder) must cause a copy of the notice to be given to the operator's representative.
4. If the responsible person is the operator or an employer (other than the operator) of members of the workforce, the operator's representative at the facility must give a copy of the notice to each health and safety representative for a designated work group having group members performing work that is affected by the notice.
5. If the responsible person is the titleholder, as soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to the operator and, if the NOPSEMA inspector is at the facility when the notice issued, the operator's representative at the facility.
6. If the responsible person is the titleholder, but the inspector is not at the facility when the notice is issued, the operator must give a copy of the notice to the operator's representative at the facility.
7. As soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to, where applicable:
 - (a) the employer of an employee who is a member of the workforce if the notice is issued to the employee, and in connection with work performed by the employee, and
 - (b) the owner of any workplace plant, substance or thing that the notice relates to, unless the owner is the responsible person or an employer referred to in (a), and
 - (c) if the responsible person is the owner of any workplace, plant, substance or thing because of which the contravention has occurred, or is likely to occur: the operator of the facility, and if the employer of employees who work in that workplace or who use that plant, substance or thing is a person other than the operator—that employer; and
 - (d) the titleholder, if the responsible person is the operator, and the contravention relates, or is likely to relate to, the titleholders' well related obligations.
8. Under item 8 of subclause 80A(1) of Schedule 3 to the Act, any of the following persons may in writing request the reviewing authority to review the NOPSEMA inspector's decision:
 - the operator of the facility
 - the titleholder, if the notice is issued to a titleholder;
 - any other person to whom the notice has been issued;
 - an employer, if affected by the decision;
 - a relevant health and safety representative;
 - a relevant workforce representative, if requested by a member of the workforce affected by the decision;
 - a person who owns any workplace plant, substance or thing to which the NOPSEMA inspector's decision relates.
9. An improvement notice ceases to have effect when the responsible person takes the action specified in the notice.

OHS Improvement Notice

Offshore Petroleum and Greenhouse Gas Storage Act 2006

Notice Number: 654

OHS IMPROVEMENT NOTICE

To: Esso Australia Pty Ltd

In conducting an OHS inspection in relation to the Flounder facility, I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the Act, am satisfied on reasonable grounds that the person named above as the responsible person is contravening, or has contravened and is likely to contravene again:

(a) clause 9 (2) (c) of Schedule 3 to the Act

at: Snapper facility

The reasons for my opinion are:

Failure of an instrument tubing line connected to Flounder A27 wellhead gas lift line resulted in the release of an estimated 1106 kg of hydrocarbon gas from the production annulus over a time period of 3.5 hours, elevating the risk on the facility during the release. Although initiation of the Surface Shut Down also closed the shutdown valve fitted to the gas lift line, this did not isolate the flow of hydrocarbon gas from the production annulus as the failed instrument line had been located on the gas lift line between the wellhead production annulus and gas lift line shutdown valve. This configuration created an unrestricted pathway from the failed instrument tubing line to the full volume of the production annulus which was not able to safely isolate the gas inventory of the production annulus.

Other gas lift wells on the Snapper facility were then identified to have either, small bore tubing, instrumentation and valve fittings fitted between the wellhead and gas lift line shutdown valve. As with A27, there are no effective barriers to isolate the hydrocarbon gas contained in the production annulus in the event of a failure in the integrity of one or more fittings.

As a result of this contravention I am satisfied that there is, or may be, the following risk to the health or safety of any person:

The potential for an uncontrolled release of a significant volume of hydrocarbon gas from the production annulus of gas lift production wells and the inability to isolate such a release on detection.

You are required to take action within 180 days of the date of this notice to prevent or reduce the risk.

The following action must be taken by the responsible person within the period specified above:

Esso Australia Pty Ltd are to reduce the risk of loss of annulus containment to ALARP, by ensuring that all wells on Snapper have gas lift line shutdown valves fitted as close as practicable to the wellhead and that this valve be activated with the same pneumatic signal as the surface safety valve to effect isolation of the gas lift line and any small-bore take-offs; or,

Implement such other controls as required to reduce risk to a level that is as low as reasonably practicable.

Signed:

[REDACTED]

NOPSEMA inspector

Dated: 27th April 2017

NOTES: (Please see back of notice)

When the required improvement has been completed, return this part of the notice to the following person at the address below:

Name:



Position: Manager Assessment and Inspection

Address: Send in electronic format via email to:
submissions@nopsema.gov.au

Telephone number: +61 8 6188 8700

Specify the action that has been taken to comply with this notice in the space below.

Improvement Notice No. **654** has been complied with by:

Signed: _____ Date: _____

NOTES:

1. Under clause 78 of Schedule 3 to the Act, a person who fails to ensure that this notice is complied with, to the extent that it relates to a matter over which the person has control, may be liable to a penalty of 300 penalty units or a civil penalty of 400 units.
2. This notice must be displayed in a prominent place at or near each workplace at which work affected by the notice is being performed and, must not be tampered with or removed before the notice has ceased to have effect.
3. If the notice is not issued by being given to the operator's representative at the facility, the responsible person (unless the responsible person is the titleholder) must cause a copy of the notice to be given to the operator's representative.
4. If the responsible person is the operator or an employer (other than the operator) of members of the workforce, the operator's representative at the facility must give a copy of the notice to each health and safety representative for a designated work group having group members performing work that is affected by the notice.
5. If the responsible person is the titleholder, as soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to the operator and, if the NOPSEMA inspector is at the facility when the notice issued, the operator's representative at the facility.
6. If the responsible person is the titleholder, but the inspector is not at the facility when the notice is issued, the operator must give a copy of the notice to the operator's representative at the facility.
7. As soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to, where applicable:
 - (a) the employer of an employee who is a member of the workforce if the notice is issued to the employee, and in connection with work performed by the employee, and
 - (b) the owner of any workplace plant, substance or thing that the notice relates to, unless the owner is the responsible person or an employer referred to in (a), and
 - (c) if the responsible person is the owner of any workplace, plant, substance or thing because of which the contravention has occurred, or is likely to occur: the operator of the facility, and if the employer of employees who work in that workplace or who use that plant, substance or thing is a person other than the operator—that employer; and
 - (d) the titleholder, if the responsible person is the operator, and the contravention relates, or is likely to relate to, the titleholders' well related obligations.
8. Under item 8 of subclause 80A(1) of Schedule 3 to the Act, any of the following persons may in writing request the reviewing authority to review the NOPSEMA inspector's decision:
 - the operator of the facility
 - the titleholder, if the notice is issued to a titleholder;
 - any other person to whom the notice has been issued;
 - an employer, if affected by the decision;
 - a relevant health and safety representative;
 - a relevant workforce representative, if requested by a member of the workforce affected by the decision;
 - a person who owns any workplace plant, substance or thing to which the NOPSEMA inspector's decision relates.
9. An improvement notice ceases to have effect when the responsible person takes the action specified in the notice.

OHS Improvement Notice

Offshore Petroleum and Greenhouse Gas Storage Act 2006

Notice Number: 655

OHS IMPROVEMENT NOTICE

To: Esso Australia Pty Ltd

In conducting an OHS inspection in relation to the Flounder facility, I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the Act, am satisfied on reasonable grounds that the person named above as the responsible person is contravening, or has contravened and is likely to contravene again:

(a) clause 9 (2) (c) of Schedule 3 to the Act

at: Tuna facility

The reasons for my opinion are:

Failure of an instrument tubing line connected to Flounder A27 wellhead gas lift line resulted in the release of an estimated 1106 kg of hydrocarbon gas from the production annulus over a time period of 3.5 hours, elevating the risk on the facility during the release. Although initiation of the Surface Shut Down also closed the shutdown valve fitted to the gas lift line, this did not isolate the flow of hydrocarbon gas from the production annulus as the failed instrument line had been located on the gas lift line between the wellhead production annulus and gas lift line shutdown valve. This configuration created an unrestricted pathway from the failed instrument tubing line to the full volume of the production annulus which was not able to safely isolate the gas inventory of the production annulus.

Other gas lift wells on the Tuna facility were then identified to have either, small bore tubing, instrumentation and valve fittings fitted between the wellhead and gas lift line shutdown valve. As with A27, there are no effective barriers to isolate the hydrocarbon gas contained in the production annulus in the event of a failure in the integrity of one or more fittings.

As a result of this contravention I am satisfied that there is, or may be, the following risk to the health or safety of any person:

The potential for an uncontrolled release of a significant volume of hydrocarbon gas from the production annulus of gas lift production wells and the inability to isolate such a release on detection.

You are required to take action within 180 days of the date of this notice to prevent or reduce the risk.

The following action must be taken by the responsible person within the period specified above:

Esso Australia Pty Ltd are to reduce the risk of loss of annulus containment to ALARP, by ensuring that all wells on Tuna have gas lift line shutdown valves fitted as close as practicable to the wellhead and that this valve be activated with the same pneumatic signal as the surface safety valve to effect isolation of the gas lift line and any small-bore take-offs; or,

Implement such other controls as required to reduce risk to a level that is as low as reasonably practicable.

Signed:

[REDACTED]

NOPSEMA inspector

Dated: 27th April 2017

NOTES: (Please see back of notice)

When the required improvement has been completed, return this part of the notice to the following person at the address below:

Name:



Position: Manager Assessment and Inspection

Address: Send in electronic format via email to:
submissions@nopsema.gov.au

Telephone number: +61 8 6188 8700

Specify the action that has been taken to comply with this notice in the space below.

Improvement Notice No. **655** has been complied with by:

Signed: _____ Date: _____

NOTES:

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5. If the responsible person is the titleholder, as soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to the operator and, if the NOPSEMA inspector is at the facility when the notice issued, the operator's representative at the facility.
6. If the responsible person is the titleholder, but the inspector is not at the facility when the notice is issued, the operator must give a copy of the notice to the operator's representative at the facility.
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 - (b) the owner of any workplace plant, substance or thing that the notice relates to, unless the owner is the responsible person or an employer referred to in (a), and
 - (c) if the responsible person is the owner of any workplace, plant, substance or thing because of which the contravention has occurred, or is likely to occur: the operator of the facility, and if the employer of employees who work in that workplace or who use that plant, substance or thing is a person other than the operator—that employer; and
 - (d) the titleholder, if the responsible person is the operator, and the contravention relates, or is likely to relate to, the titleholders' well related obligations.
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