

ENVIRONMENTAL IMPROVEMENT NOTICE

To: Santos Limited

In conducting a petroleum environmental inspection in relation to the Mutineer-Exeter Development Field Operations activity, I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006*, am satisfied on reasonable grounds that the titleholder named above has contravened and is likely to contravene again:

- (a) regulation 7 of the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 (the Environment Regulations)

at: Mutineer-Exeter Field

1. The reasons for my opinion are:

- 1.1. Santos has not provided appropriate incident management training to nominated Santos personnel identified to coordinate and manage an oil spill response, as specified in the accepted environment plan.
- 1.2. As a result of the limited training provided to identified personnel within the company, Santos does not have the appropriate capacity to coordinate and manage an oil spill response as required by the accepted environment plan. A limited capacity to respond to an oil spill may reduce the timeliness of the response to an oil spill resulting in an ineffective incident response.

2. As a result of this contravention I am satisfied on reasonable grounds that there is, or may be, the following significant threat to the environment:

- 2.1. Ineffective incident response actions may result in significant environmental impacts to sensitive features of the ecological and socio-economic environment. This may include unnecessary delays in incident response planning and / or response decision-making may preclude the avoidance or minimisation of hydrocarbon impacts on sensitive environmental features such as marine parks and reserves, areas that support commercially valued fish stocks and habitats for listed threatened and migratory species.

3. The environment that is subject to the threat is:

- Matters protected under Part 3 of the *Environment Protection and Biodiversity Conservation Act 1999*, including listed species of seabirds, fish, marine mammals and marine reptiles that may occur in the operating area and surrounds as shown in Section 4 of the accepted Mutineer-Exeter Development Field Operations Environment Plan.
- The social and economic features of the environment as defined in the Environment Regulations.

4. The titleholder is required to take action within 90 days of the date of this notice to remove the threat.

5. The following actions must be taken by the titleholder within the period specified above:

- 5.1. Review oil spill response training and competency requirements for personnel who would be required to fill the following key incident management roles as part of the Santos oil spill response team:
 - Oil Spill Response Incident Controller

- Planning Officer
- Situation Coordinator
- Operations Officer
- Logistics Officer
- Environment Coordinator

- 5.2. Ensure the review specified in 5.1 of this Notice considers the training and competency requirements adopted by the National Plan and offshore petroleum industry; and
- 5.3. Ensure Santos personnel assigned to key oil spill response incident management roles have the required competencies and meet their relevant training requirements in a timely manner and consistent with the requirements of the in force EP and the outcomes of the review specified in 5.1 and 5.2 of this Notice; or
- 5.4. by any other means comply with Regulation 7 of the Environment Regulations.

Signed:



NOPSEMA inspector

Dated: 17 May 2017

When the required improvement has been completed, the NOPSEMA Inspector requires Santos Limited to submit the completed part of the notice under Clause 8, to the contact details below:

Name: 

Position: Environment Specialist

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

Telephone number: +61 8 6188 8700

By signing below, I confirm on behalf of Santos Limited that the specified action described in Improvement Notice No. 656 has been undertaken within the period specified.

Signed: _____ Date: _____

NOTES:

1. 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 (Schedule 2A, Clause 11D of the Act).
2. This notice must be displayed in a prominent place at the premises and, must not be tampered with or removed before the notice has ceased to have effect. (Schedule 2A, Clauses 11D and 12 of the Act)
3. The notice may be issued to the titleholder by being given to the titleholder's representative at the premises who is nominated for the inspection. (Schedule 2A, Clause 11C of the Act)
4. 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 (Schedule 2A, Clause 11D of the Act):
 - (a) the operator's representative at the facility if the premises are a facility, and
 - (b) the vessel master if the premises are a vessel under the command or charge of a master, and
 - (c) the owner, if the premises are owned by a person other than the titleholder or operator.
5. An improvement notice ceases to have effect when the responsible person takes the action specified in the notice.
6. NOPSEMA must publish on its website an environmental improvement notice within 21 days after the notice is issued, unless NOPSEMA is aware that the decision to issue the notice is the subject of an application for review by a court. (Schedule 2A, Clause 12A of the Act)
7. For the purposes of submitting the completed part of the notice under Clause 8, the titleholder's representative is the person to whom this notice was given.