

ENVIRONMENTAL IMPROVEMENT NOTICE

To: PTTEP Australasia (Ashmore Cartier) Pty Ltd (PTTEP AA)

In conducting a petroleum environmental inspection in relation to the Montara 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 is contravening and is likely to contravene again:

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

at: Montara Field.

1. The reasons for my opinion are:
 - 1.1. PTTEP AA has not provided training nor maintained the knowledge and skills in relation to oil spill response management for all of the nominated personnel, as specified by the accepted Montara Operations Environment Plan (EP).
 - 1.2. PTTEP AA has not implemented a formal mechanism for ensuring that external personnel resources identified to coordinate and manage an oil spill response within PTTEP AA's Emergency Management Team are familiar with the relevant PTTEP AA processes and procedures.
 - 1.3. As a result PTTEP AA does not have the appropriate capacity to coordinate and manage an oil spill response as required by the EP.
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. In the event of an oil spill, increased exposure of spilled oil to the environment as a result of unnecessary delays in the implementation of, or incorrect application of, oil spill response strategies and techniques due to PTTEP AA's insufficient capacity to coordinate and management an oil spill response. Such delays would preclude the avoidance or minimisation of oil spill impacts on the marine environment.
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 5 of the EP.
 - Social and economic features of the environment as described in Subsection 5.5 of the EP.
 - Marine resources as described in Subsection 5.5 of the EP.
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. Identify all roles for the purpose of oil spill management to be undertaken by PTTEP AA and demonstrate that PTTEP AA has sufficient capacity to fill these roles for the duration of oil spill response scenarios as identified in the EP. Identify how resources available to PTTEP AA are capable of filling the remaining roles.
 - 5.2. Establish a new or adapt an existing system to attain the following:

- 5.2.1. Determine what training; testing; and other activities are required to meet and then maintain the Environmental Performance Outcome (EPO) stated in the EP for ensuring all personnel have the appropriate skills and knowledge to be familiar and current with PTTEP AA's internal oil spill arrangements and procedures and to run an effective oil spill response.
 - 5.2.2. Ensure that training, testing and other activities required to meet and maintain this EPO are implemented to ensure that all nominated personnel are equipped with the appropriate skills and knowledge and are familiar with PTTEP AA's arrangements and procedures to run an effective oil spill response.
 - 5.2.3. Establish what mechanisms are required to examine the effectiveness of this system against the requirements of the EP and ensure that there are mechanisms available to address recommendations should the system not meet those objectives.
 - 5.2.4. Develop a program of activities to ensure third parties who may be involved in an oil spill are fully aware of their roles responsibilities in relation to the EP, including updates as a result of regular reviews of the oil spill response arrangements in the Oil Pollution Emergency Plan (OPEP).
- 5.3. Ensure that personnel assigned to key oil spill management roles meet the relevant competency and training requirements established through 5.1 and 5.2.; or
 - 5.4. By any other means comply with Regulation 7 of the Environment Regulations.

Signed:



NOPSEMA inspector

Dated: 21 June 2017

NOTES: (Please see the last page of this notice)

When the required improvement has been completed, the NOPSEMA Inspector requires PTTEP Australasia (Ashmore Cartier) Pty Ltd to submit the completed part of the notice under Clause 8, to the contact details below:

Name: [REDACTED]

Position: NOPSEMA Inspector

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 PTTEP Australasia (Ashmore Cartier) Pty Ltd that the specified action described in Improvement Notice No. 0663 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.