

OHS Improvement Notice

Offshore Petroleum and Greenhouse Gas Storage Act 2006

Notice Number: 0694

OHS IMPROVEMENT NOTICE

To: Expro Group Australia Pty Ltd

In conducting an OHS inspection in relation to the Ocean Monarch facility, I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (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 clause 13 (1) (a)(b) of Schedule 3 to the Act at the Ocean Monarch facility.

The reasons for my opinion are:

A NOPSEMA OHS inspection was conducted on the Ocean Monarch facility while well abandonment activities were being undertaken for titleholder, BHP Billiton Petroleum Pty Ltd (BHP Billiton), in permit areas WA-10-L and WA-12-L. The activities were conducted under the Diamond Offshore General Company (facility operator) safety case in force comprising of the following documents:

- Ocean Monarch Mobile Offshore Drilling Unit Safety Case (Document No. OM-SC-001, Revision 0-C, 25 March 2015); and
- Safety Case - Part 8 BHP Billiton Griffin Abandonment Campaign (2017) (Document No. OM-SCR-005, Revision 0, dated 21 April 2017), jointly prepared between BHP Billiton and Diamond Offshore General Company. BHP Billiton was responsible for selecting and managing client specific service contractors ('third party contractors') and associated equipment under the provisions and commitments made within the safety case in force.

Well fluid handling services and equipment were provided by BHP Billiton through a service contract with Expro Group Australia Pty Ltd (EXPRO).

Information reviewed by NOPSEMA identified that the integrity and quality assurance of the EXPRO supplied equipment including surge tank, surface safety valve (SSV), high pressure hose and high pressure pipework used by BHPB for well fluids bleed off activities at the Ocean Monarch facility had not been adequately demonstrated, and their actual certification condition deviated from those required by section 8.3.6.10 of the facility safety case in force.

Specific deficiencies identified include, but are not limited to:

- No independent qualified technical authority verification available for the majority of the equipment reviewed;
- Incomplete testing (e.g. ultrasonic testing) of surge tank internal pipe work;
- Inadequate Level 2 inspection and pressure testing for high pressure flexible hose; and
- Level 3 maintenance Attestation documents supplied for the Surge Tank, Surface Safety Valve, and HP pipework do not meet the requirements of the EXPRO Well test maintenance manual (Document No. INS-002075, Revision 6) Section 5.1 "*Criticality Class Certification*" for 5 yearly maintenance.

EXPRO records indicated that they did not undertake an effective maintenance assurance process, nor did they undertake appropriate remedial actions following BHP Billiton QA/QC inspection findings, which identified some of the deficiencies listed above. EXPRO as the third party services provider and equipment

owner, and in control of the activities associated to this equipment, did not take all reasonable practicable steps to ensure that the equipment was safe and without risk to health when it was used for well fluids bleed-off activities and hydrocarbon gas venting at the Ocean Monarch facility.

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:

Injury or death to personnel during well abandonment activities, as a result of a loss of containment of hydrocarbons and the associated risk of fire and/or explosion.

You are required to take action within **60 days** of the date of this notice to prevent or reduce the risk.

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

1. Complete a management review of the auditing and acceptance process for EXPRO equipment and address any actions from this review.
2. Strengthen processes and procedures to ensure that:
 - all safety-critical equipment to be used at facilities (as defined by the Act), have been Inspected Maintained and Verified by an Independent Competent Body to the standards described in the EXPRO Well Test Maintenance Manual and to appropriate technical standards referenced in the relevant facility scope of validation and safety case; and
 - this equipment has comprehensive documentation detailing that it has been inspected, maintained and verified.

Or

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

Signed: [REDACTED]

[REDACTED]
NOPSEMA inspector

Dated: 23-1-2018

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: [REDACTED]

Position: NOPSEMA Inspector

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. **0694** 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.