

OHS IMPROVEMENT NOTICE

To: Eni Australia Limited (Eni)

In conducting an OHS inspection in relation to the Woollybutt facility, I, [REDACTED], a NOPSEMA Inspector appointed under section 602 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (Act), am satisfied on reasonable grounds that the person named above, is the operator and also the responsible person for the purpose of this notice, and is contravening, clause 9(2)(c) of Schedule 3 to the Act at the Woollybutt facility.

The reasons for my opinion are:

On 12 January 2020, Eni notified NOPSEMA that the Woollybutt single point mooring buoy had sunk to the seabed. As a result, I conducted an inspection that included examining the integrity of parts of the facility's subsea infrastructure. The inspection was conducted at Eni's business premises on 27 February 2020 and it was found that the sinking of the single point mooring buoy was likely as a result of a failure to maintain adequate cathodic protection which protects the buoy from corrosion. The inspection also identified a number of deficiencies related to the integrity management of the facility's two mid-depth buoy (MDB) mooring systems. Each MDB is secured by two mooring chains to their gravity base structure positioned on the seabed.

Clause 9(2)(c) of Schedule 3 to the Act requires the operator of a facility to take all reasonably practicable steps to ensure that any plant and equipment at the facility are safe.

During the inspection I found that:

- Eni could not demonstrate effective inspection and maintenance activities were being conducted on the MDBs, mooring chains and mooring systems to ensure their integrity and that they were fit for service.
- There was no evidence that annual inspections of the MDBs including their mooring chains and mooring systems were conducted in accordance with the API RP 2I recommended practice for '*In-service inspection of mooring hardware for floating structures*' as referenced in API RP 2SK as detailed in the MDB life extension and validation plan.
- There were no records of chain wear measurements or assessment of the MDB mooring chains available.
- Subsea inspection reports back to 2010 identified that the MDB mooring chains were '*mostly obscured by heavy marine growth*'. No evidence was provided by Eni that the marine growth had been removed from the chains to ensure effective general visual inspection could be completed.
- The MDBs had a design life of 5 years and fatigue life of 15 years. The Woollybutt field commenced production in 2003, 17 years ago. Therefore the original design and fatigue life of the MDBs has been exceeded. There was no evidence that the MDB's design and fatigue life had been reassessed and certified as fit for service beyond 2016.

As a result of the above, I am satisfied that Eni is not taking all reasonably practicable steps to inspect and maintain the MDB's mooring system, contravening clause 9(2)(c) of Schedule 3 to the Act.

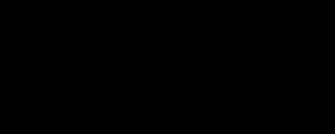
As a result of this contravention I am satisfied that there is the following risk to the safety of people on marine vessels at or near the facility:

In the event of a mooring system failure resulting in an MDB floating to the surface, this would create a marine vessel collision hazard leading to vessel damage or sinking and could result in injuries to, or loss of life of, vessel personnel.

Eni is required to take action within **180** days of the date of this notice to prevent or reduce the risk.

I am satisfied on the grounds set out above that the following action must be taken by Eni to reduce or prevent the risk:

- Conduct chain wear measurement of the MDB mooring chains; and
- Conduct inspection of steel components for the MDB mooring systems in accordance with API RP 2I; and
- Conduct mooring chain wear assessments and determine the minimum chain diameter based on mooring strength and fatigue to establish the chain life extension period; and
- Ensure the integrity of the MDBs mooring chains and mooring systems are fit for service; or
- Implement other controls as required to reduce risk to a level that is as low as reasonably practicable.

Signed: 

NOPSEMA Inspector

Dated: 4 MAY 2020

NOTES: (Please see back of notice)

The following section is to be completed if serving the notice to the responsible person by giving it to the operator's representative or titleholder's representative at the facility, or the identified responsible person onshore.

This notice was delivered to:

[Redacted]

(insert name)

in the office or position of

[Redacted]

(insert office or position)

at: _____ am/pm on _____

(insert time)

(insert date)

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. **788** 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.