

OHS PROHIBITION NOTICE

To: Vermilion Oil & Gas Australia Pty Ltd (VOGA)

In conducting an OHS inspection in relation to the Wandoo B facility, I <redacted>, a NOPSEMA inspector appointed under section 602 of the Act, am satisfied on reasonable grounds that:

- an activity is occurring at the facility that involves an immediate threat to the health or safety of a person; or
- an activity may occur at the facility that, if it occurred, would involve an immediate threat to the health or safety of a person.

I am satisfied that it is reasonably necessary to issue a prohibition notice to the registered operator of the Wandoo B facility, Vermilion Oil & Gas Australia Pty Ltd (VOGA) in order to remove the threat.

I THEREFORE DIRECT Vermilion Oil & Gas Australia Pty Ltd to ensure that the following activity or activities is/are not conducted:

(a) at this workplace or part of workplace:

Wandoo B Platform

(b) using this plant or substance:

Hydraulic Workover Unit

(c) following these procedures:

- Well B16 Workover Program, AW19001-WNB-3000-GD-0020, Revision 0
- Power Tong Weatherford 14-50 with Free Floating Back-Up – SOP, GL-TRS-OEPS-L4-15

The activity that has caused or may cause the threat to health or safety is:

Breaking-up threaded well piping using power tongs in an elevated work basket without implementing sufficient controls to reduce the risks to as low as reasonably practicable.

The reasons why the activity has caused or may cause the threat to health or safety is:

There was an incident on Saturday 22 February 2020 in which an unrestrained power tong struck a service technician causing the technician to be thrown against the winch controls with sufficient force to cause bruising and abrasions. The workover activities are currently suspended however there is an intention to recommence the activities to complete the Well B 16 workover program.

It is considered that a more serious injury or fatality could occur if the same activity were repeated without implementing additional controls.

An initial investigation conducted by VOGA identified that there were technical controls available to prevent the incident (Safety Line, Back-up Jaws and Low Gear Select) but that these were not implemented by the service technician prior to the incident. The VOGA investigation has not yet fully addressed the causal human factors that may have led the service technician to not implement the mandated controls.

The inspection conducted by NOPSEMA on 24 February 2020 identified a number of deficiencies with Contractor Management and Supervision, Permit to Work and Hazard Identification that have not yet been fully investigated or

addressed by VOGA. If VOGA were to recommence the Well B16 workover program without completing the incident investigation that identifies all the causal factors and implements additional controls there is a threat that a similar incident could reoccur.

Actions that may be taken that will be adequate to remove the threat to health and safety are:

- Conduct an investigation into the causal human factors that may have led the service technician not to implement the mandated technical controls; and
- Conduct an investigation into the VOGA safety management system to identify the systemic factors that contributed to the incident. These should address, as a minimum, Contractor Management and Supervision, Permit to Work and Hazard Identification; and
- Conduct a hazard identification to identify the hazards and assess the risks associated with the activity on the Wandoo B Platform and implement additional controls as necessary to ensure the risks of the activity are reduced to as low as reasonably practicable; or
- Take other measures, as may be necessary, to remove the threat to health or safety.

Signed:

<redacted>

NOPSEMA inspector

Dated: 27 February 2020

NOTES: (Please see back of form)

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 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)

NOTES:

1. Under clause 77 of Schedule 3 to the Act, a responsible person who fails to ensure that this notice is complied with, to the extent that it relates to a matter over which the responsible person has control, may be liable to a penalty of 600 penalty units.
2. Under clause 77A of Schedule 3 to the Act, a notice ceases to have effect in relation to a responsible person when a NOPSEMA inspector notifies the responsible person that the inspector is satisfied that the responsible person, or another person, has taken adequate action to remove the threat to health or safety.
3. This notice must be displayed in a prominent place at the workplace and must not be tampered with or removed before the notice has ceased to have effect.
4. If this prohibition notice (or a copy of the notice) is not given to the operator's representative at the facility, the operator must give a copy of the notice to the operator's representative.
5. The operator's representative at the facility must give a copy of the notice to the following persons:
 - if the workplace, plant, substance or thing to which the notice relates is owned by a person other than the responsible person—that owner; and/or
 - if there is a health and safety representative for a designated work group that includes a group member performing work at a workplace, or involving the plant, substance or thing, to which the direction relates—that representative.
6. If the only responsible person for the notice is the titleholder, as soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy to both the operator and the operators representative at the facility (if the inspector is at the facility when the notice is issued).
7. Under item 5 of clause 80A of Schedule 3 to the Act, any of the following persons may request the reviewing authority in writing to review the NOPSEMA inspector's decision:
 - the operator of the facility;
 - the titleholder, if the notice is issued to a titleholder;
 - 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.