

Well operations management plan assessment

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1. Purpose

This purpose of this policy is to provide a documented, systematic, and consistent approach for the conduct of assessments of well operations management plans (WOMPs), WOMP revisions and resubmissions.

This policy supports and provides additional detail to the overarching Assessment Policy: N-04000-PL0050 – Assessment.

2. Scope

The assessment of WOMPs, WOMP revisions or WOMP resubmissions to NOPSEMA under the relevant regulations.

3. Relevant legislation

Offshore Petroleum and Greenhouse Gas Storage Act 2006 (OPGGs Act).

Offshore Petroleum and Greenhouse Gas Storage (Resource Management and Administration) Regulations 2011.

The relevant state or Territory legislation may apply in the event the state or Territory governments confer powers to NOPSEMA for the regulation of wells in state or Territory waters. The regulations may or may not mirror the Commonwealth legislation. For simplicity, this policy only makes explicit reference to the Commonwealth legislation.

4. Well operations management plan assessment

4.1. NOPSEMA engagement in relation to well operations management plan submissions

NOPSEMA has a legislated function under Section 646 (f) and 646 (gf) of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* to provide advice on:

- (f) occupational health and safety matters relating to offshore petroleum operations or offshore greenhouse gas storage operations
- (gf) matters relating to the non-OHS structural integrity of:
 - i. facilities (within the meaning of Schedule 3)
 - ii. wells
 - iii. well-related equipment

- iv. located in Commonwealth waters.

As part of this legislated function, NOPSEMA is committed to being responsive to titleholders information needs during the well operations assessment process. This includes engagement with the titleholder from their entry into the regime, through to commencement of their well activities.

4.2. WOMP assessment decisions and notifications

Titleholders shall be notified of assessment decisions in accordance with OPGGS (RMAR) regulation 5.07(8), (9) and (10).

4.2.1. WOMP and WOMP revisions

For a new or revised WOMP, NOPSEMA will, within 30 days of receipt of a submission, in accordance with regulation 5.07(1):

- a. accept the plan
- b. if the regulator is not reasonably satisfied that the plan meets the relevant criteria provide the titleholder a reasonable opportunity to modify and resubmit the WOMP
- c. if the regulator is unable to make a decision on the plan, give the titleholder notice in writing and set out a proposed timetable for consideration of the plan.

NOPSEMA considers that generally a single opportunity to modify and resubmit, together with up to two requests for further written information per submission or resubmission constitutes a reasonable opportunity under regulation 5.08(2).

4.2.2. Consideration after opportunity for resubmission

When a WOMP is resubmitted after an opportunity to modify it, NOPSEMA may, within 30 days of receipt of a submission in accordance with Reg. 5.07(4)(b):

- a. provide a further opportunity to modify and resubmit
- b. accept the WOMP
- c. refuse to accept the WOMP
- d. accept the WOMP in part, or subject to conditions.

Where NOPSEMA notifies a titleholder that it is unable to make a decision within 30 days NOPSEMA will, in accordance with regulation 5.07(1)(c) or 5.07(4)(c) for a resubmission, give the titleholder notice in writing and set out a proposed timetable for consideration of the plan.

At any stage during the assessment process NOPSEMA may request the titleholder provide further written information (regulation 5.07A). Where such a request has been made, this information will be assessed as if it had been included in the WOMP, WOMP revision or resubmission. NOPSEMA will generally reach a decision as per section 4.2.1 or 4.2.2 as appropriate within 10 days of receiving the titleholder's response.

As mentioned above, if NOPSEMA is not able to make a decision within the 30 day assessment timeframe, NOPSEMA will provide a notice under regulation 5.07(1)(c) or 5.07(4)(c), as appropriate.

4.3. Pre-assessment

All WOMP submissions made to NOPSEMA shall undergo a pre-assessment process to confirm that:

- the requirements of OPGGS (RMAR), Part 5, have been met (details of person making submission)
- the basis for making the submission is clear (i.e. under which regulation or sub-regulation the submission is being made)
- the submission is being made by a sole titleholder, or a nominated titleholder where there is more than one registered holder of the title OPGGS Act, Section 775B
- NOPSEMA's preference for one electronic copy has been met.

An unsuccessful pre-assessment may result in a submission being returned or the commencement of the assessment being delayed.

The titleholder will be notified in writing when a submission or resubmission has been received and the assessment has commenced.

4.4. Assumption that information submitted by the titleholder is correct

In general, a fundamental assumption will be made that the information provided by the titleholder in the submission is correct.

4.5. Assessment in accordance with the regulations

The assigned assessor shall make judgements on the compliance of the submission with the OPGGS (RMAR) based on the content of the submission and any further written information requested by NOPSEMA during the course of the assessment (regulation 5.07A).

NOPSEMA's acceptance decision shall be based on an assessment of the complete submission against the contents and acceptance criteria contained in the OPGGS (RMAR), with consideration of the Guidance Note – N-04600-1602 WOMP Content and level of detail.

For new and revised WOMPs, NOPSEMA must satisfy itself that the submission meets both the criteria for acceptance specified in regulation 5.08 and the contents requirements specified in regulation 5.09 of the OPGGS (RMAR).

In the case of resubmitted WOMPs, NOPSEMA shall accept the submission based on its compliance with regulation 5.07(4) (refer to section 4.2.2).

Assessment of a revision to an accepted WOMP will generally focus primarily on the basis for the proposed revision and need not necessarily involve a complete reassessment of the plan. However, the assessor must still be satisfied, before recommending acceptance of the revised WOMP, that it still meets both the criteria

for acceptance specified in regulation 5.08 and the content requirements specified in regulation 5.09 of the OPGGS (RMAR).

In all cases, a complete WOMP must be submitted.

4.6. Requests for further written information

If a titleholder submits a WOMP (including by resubmitting a plan in response to a notice under subregulation 5.07(2)), NOPSEMA may ask the titleholder to provide further written information about any matter that is required under subregulation 5.09(1) to be included in the WOMP.

The request must:

- a. be in writing
- b. set out each matter for which information is requested
- c. specify a reasonable period within which the information is to be provided.

If a titleholder receives a request, and provides information requested by the regulator within the period specified or within a longer period agreed to by NOPSEMA:

- d. the information becomes part of the WOMP
- e. NOPSEMA must have regard to the information as if it had been included in the WOMP when it was submitted.

NOPSEMA shall only make a maximum of two requests for further written information per submission or resubmission under regulation 5.07A.

4.7. WOMPs may be accepted in part

The regulations allow NOPSEMA to accept part of a WOMP (regulation 5.07(8)(c)). The acceptance by NOPSEMA of a part shall be taken as the refusal to accept the other parts of the WOMP. NOPSEMA will only accept a part of a WOMP in exceptional circumstances. Generally, and in the absence of any other reasons, NOPSEMA's inability to reach a decision to accept a whole plan shall be deemed to be an indicator of the plan's quality, and hence a refusal to accept decision is preferred over accepting a plan in part.

4.8. Acceptance decisions shall typically be unconditional

Although the regulations make provision for imposing conditions on the acceptance of a WOMP [RMAR regulation 5.07(4) or 5.07(8)], the imposition of conditions shall generally not be done. In the absence of any other reasons, NOPSEMA's inability to reach a decision to accept a WOMP, WOMP revision or resubmitted WOMP, without conditions shall be deemed to be an indicator of the submission's quality. As such, a refuse to accept decision is preferred over imposing limitations or conditions on the acceptance.

4.9. Refuse to accept the plan decision

Where NOPSEMA is not reasonably satisfied a WOMP meets the acceptance criteria, and after providing a reasonable opportunity to modify and submit the WOMP, NOPSEMA must refuse to accept the WOMP. In accordance with OPGGS (RMAR), regulation 5.07(8)(9) & (10). NOPSEMA must notify the titleholder in writing of the reasons for its decision, set out the reasons and the terms (if applicable) for the decision.

Where NOPSEMA has refused to accept a WOMP revision in accordance with OPGGS (RMAR) regulation 5.07(8)(b), the previously accepted WOMP remains in force. However, NOPSEMA will consider whether it is appropriate to withdraw acceptance of the WOMP in force in accordance with OPGGS (RMAR), regulation 5.18.

5. Assessment of an 'End of WOMP' report

In accordance with OPGGS (RMAR), regulation 5.17, the operation of a WOMP ends when:

- (a) the titleholder has permanently abandoned the well or wells to which the plan applies; and
- (b) the titleholder has given the regulator a written report of the process that was undertaken in abandoning the well or wells, and the outcome of that process; and
- (c) the regulator notifies the titleholder in writing that the regulator is reasonably satisfied that the process of abandoning the well or wells has been undertaken in accordance with the WOMP.

NOPSEMA considers well abandonments as described in the latest editions of NORSOK-D010 and/or Oil and Gas UK guidance and standards as good industry practices. Titleholders choosing to abandon wells using alternative methods shall provide NOPSEMA with a description using first principles and proven track records from recognised regulatory regimes to support the risk to ALARP argument and be detailed in the accepted WOMP.

6. Related documents

N-04600-GN1601	Well operations management plan lifecycle management
N-04600-GN1602	Well operations management plan content and level of detail