

OHS Prohibition Notice

Offshore Petroleum and Greenhouse Gas Storage Act 2006, Schedule 3 Clause 77 and 77A

Notice No: 1891

Date: 17/11/2022

To: Noble Contracting II GmbH

In conducting an OHS inspection in relation to the Noble Tom Prosser 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 an activity may occur at the facility that, if it occurred, would involve an immediate threat to the health or safety of a person

AND

It is reasonably necessary to issue this notice to Noble Contracting II GmbH in order to remove the immediate threat to the health or safety of a person.

The activity that may occur, which if it occurred would involve an immediate threat to health or safety of a person is:

- Drilling ahead into potentially pressured zones of the Santos' Spartan-2 well with well control equipment that is unfit for service.

The reasons why the activity may cause an immediate threat to health or safety of a person are:

- Periodic maintenance and inspection of well control equipment has not been conducted in line with the facility operator maintenance system as per commitments in the Noble Tom Prosser facility safety case, and as required by the relevant equipment codes and standards such as API STD 53 and API SPEC 16 D. Examples of non-conformities include:
 - o The BOP control hoses have damaged outer sheaths compromising the fire rating integrity of the hoses as required by API SPEC 16D.
 - o Records for maintenance activities show that inspection and maintenance conducted on this safety critical equipment was not appropriate; this also raises concerns regarding competency and quality of maintenance on other well-control equipment at the facility.
 - o The integrity of BOP Control hoses has therefore not been adequately demonstrated.
- Based on the above, the well control equipment may fail in emergency scenarios during drilling operations resulting in a potential major accident event with serious injury to workers.

I THEREFORE DIRECT Noble Contracting II GmbH to ensure that the activity is not conducted.

The action(s) that may be taken to adequately remove the immediate threat to health or safety of a person include:

- Ensure all well control equipment is inspected, rectified, maintained and certified as fit for use in accordance with standards referenced in the Noble Tom Prosser facility safety case such as API Standard 53. In particular, Section 5.4 "Inspection and Maintenance – Surface BOP Systems" of

this standard includes provisions such as 5.4.1.1 *Inspection and maintenance of the well control equipment shall be performed in accordance with the equipment owner's maintenance system, and 5.4.2.4 Inspections shall be performed by a competent person(s).*

and

- Ensure BOP Control Hoses are fit for purpose in accordance with API SPEC 16 D section 4.3.4.2 Piping Systems whereby the standard requires: “... *All rigid or flexible lines between the control system and BOP stack shall be flame retardant, including end connections, and shall have a rated working pressure at least equal to the rated working pressure of the system or subsystem in which the piping is installed. All control system interconnect piping, tubing, linkages, etc., should be protected from damage from drilling operations, drilling equipment movement and day-to-day personnel operations.*”

[REDACTED]
NOPSEMA INSPECTOR
[REDACTED]

17 November 2022

Notes

1. Under clause 77A of Schedule 3 to the Act, this notice ceases to have effect when the NOPSEMA inspector notifies the responsible person that the inspector is satisfied that adequate action has been taken to remove the threat to health or safety.
2. Under clause 77 of Schedule 3 to the Act, a person commits an offence if the person omits to do an act that breaches this notice, that person may be liable to a penalty of 600 penalty units.
3. For every day proceeding the initial offence that the notice is not complied with, the responsible person commits an offence in respect of each day (including a day of a conviction under this clause or any later day) during which the offence continues.
4. A copy of this notice must be displayed in a prominent place at the workplace. It is an offence to tamper with or remove it until the notice has ceased to have effect.
5. The recipient of this notice must ensure that all relevant requirements for giving copies of the notice to certain persons and representatives are complied with in accordance with cl 77 of Schedule 3 to the Act.
6. Under clause 80A of Schedule 3 to the Act, the following persons may appeal against the decision to issue the prohibition notice to the reviewing authority:
 - 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.