

# Well Operations Management Plan lifecycle management

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## Core concepts

- **Planning** – A Well Operations Management Plan (WOMP) may address one or more stages in the life of a well and may relate to more than one well. Hence a titleholder should consider all the stages in the life of a well or wells intended to be encompassed by the WOMP and should plan each of these stages to ensure there is sufficient time and resources set aside for appropriate development of the WOMP. Note that a WOMP can only cover wells “that the risks to the integrity of each well are similar and that the kinds of monitoring processes and control measures that will be implemented for each well are similar”.
- **Timing of submission** – New and revised WOMPs should be submitted well in advance of the intended activity or change. The regulations provide for a 30-day assessment period for a new WOMP or revised WOMP. The regulations also allow NOPSEMA to extend these time frames if it is unable to arrive at a decision. NOPSEMA requests for further written information or refusal to accept the WOMP can lead to delays.
- **Activities limited to an accepted WOMP** – It is an offence for a titleholder to undertake well activities that are not provided for in an accepted valid WOMP, termed the WOMP in force.
- **WOMP revision triggers** – The triggers for revising a WOMP include: at NOPSEMA’s request, on the expiry of five years, and based on circumstances. Generally, new well construction (drilling and completion), well workover or intervention, production (or testing) and abandonment activities may be covered by a new WOMP at the outset or may be progressively covered by revisions to an existing WOMP. In either case, the WOMP must contemplate the full lifecycle of the well.
- **Revision triggers and management of change** – The above regulatory triggers initiate the requirement for revision to a WOMP, while other less significant changes may be undertaken under a titleholder’s management of change process without submission of a revised WOMP to NOPSEMA. Titleholders are encouraged to develop a strategy and procedures for review and maintenance of their WOMPs over time, noting that an internal change process does not derogate titleholders’ obligations to submit a revised WOMP to NOPSEMA under the circumstance specified in the regulations.
- **Withdrawal of acceptance of a WOMP** – NOPSEMA may withdraw acceptance of a WOMP in accordance with Division 5 of the regulations.

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## Abbreviations/acronyms

|           |   |
|-----------|---|
| BHA       | Bottom-hole assembly  |
| BOP       | Blowout preventer   |
| E-line    | Electric line   |
| MoC       | Management of change  |
| NOPSEMA   | National Offshore Petroleum Safety and Environmental Management Authority |
| OPGGs Act | <i>Offshore Petroleum and Greenhouse Gas Storage Act 2006</i>             |
| SCSSSV    | Surface controlled subsurface safety valves                               |
| SSCSSV    | Subsurface controlled subsurface safety valve                             |
| WOMP      | Well operations management plan   |
| XT        | Christmas tree  |

## Key definitions

The following are some useful definitions for terms used in this guidance note. They are a suggested starting point only and are not prescriptively defined.

|                    |   |
|--------------------|---|
| In force           | In relation to a WOMP, in force means that it has been accepted by NOPSEMA, the acceptance has not been withdrawn, and the operation of the plan has not ended (Section 73) |
| Regulations        | Offshore Petroleum and Greenhouse Gas Storage (Resource Management and Administration) Regulations 2025   |
| Significant change | Significant change is likely to be one that changes the basis on which the WOMP was accepted  |

## 1. Introduction

### 1.1. Intent and Purpose

This document provides guidance on the preparation of a WOMP for a well or wells, as required under Part 5 of the Commonwealth Offshore Petroleum and Greenhouse Gas Storage (Resource Management and Administration) Regulations 2025 (the regulations) and the corresponding laws of each State or Territory where powers have been conferred upon NOPSEMA.

This guidance note is part of a suite, available on the NOPSEMA website, providing guidance on a range of aspects of the regulations. The purpose of the guidance is to explain the individual objectives of the regulations, to identify the general issues that should be considered and to provide practical examples to illustrate the concepts and potential approaches to meet the requirements of the regulations.

The guidance will be of use to people who are responsible for preparation, submission and maintenance of WOMPs for a well or wells.

The titleholder should consider all activities in the life of the well or wells to be encompassed and should plan each of these stages with sufficient time and resources set aside to ensure appropriate and timely WOMP development can be achieved.

Guidance notes indicate what is explicitly required by the regulations, discuss good practice and suggest possible approaches to meet the requirements of the regulations. An explicit regulatory requirement is indicated by the word **must**, while other cases are indicated by the words **should**, **may**, etc. NOPSEMA acknowledges that what is good practice and what approaches are valid and viable will vary according to the nature of the wells and their associated risks.

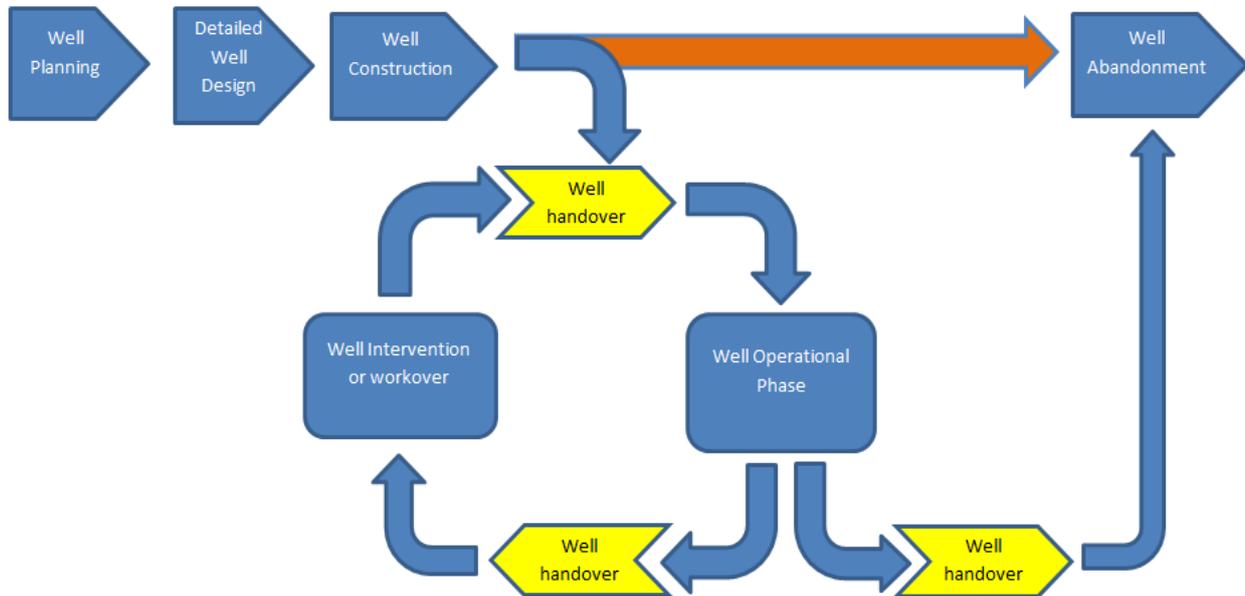
If further clarification is required with respect to WOMP lifecycle management, titleholders are encouraged to contact NOPSEMA.

This guidance note is not a substitute for legal advice on interpretation of the regulations or the Acts under which the regulations have been made.

### 1.2. Scope

The scope of this guidance note includes all well(s) and well activities as defined by Division 1 of Part 5 of the regulations.

Figure 1 below provides a graphical representation of the range of steps which form typical WOMP activities in the life of well(s).



**Figure 1 – WOMP activities in the life of well(s)**

## 2. WOMP

### 2.1. Activities in the life of a well

#### *Division 1 Requirements – preliminary*

Division 1 of Part 5 of the regulations encompasses preliminary matters through Section 69 to 74 which are self-explanatory and require no guidance.

Section 75 deems that a well in a title area that is not operational (but not permanently abandoned) constitutes the carrying out of a well activity in relation to that well. Thus, sections 76 (requirement to have well operations management plan in force) and 77 (well activity must be carried out in accordance with well operations management plan) apply.

Note that the withdrawal of an acceptance of a well operations management plan does not affect a well that is not operational: see section 94.

This latter topic is discussed elsewhere.

*Division 2 Requirements – well operations management plan*

**Part 5: WOMP:**

**Section 76 Requirement to have a well operations management plan in force**

- (1) A titleholder contravenes this subsection if:
- (a) the titleholder carries out a well activity relating to a well; and
  - (b) there is no well operations management plan in force that covers the well and well activity.

Note 1: NOPSEMA may give directions to titleholders that may relate to a well activity and must be complied with despite anything in this instrument: see sections 574, 576B and 579A of the Act.

Note 2: NOPSEMA and the responsible Commonwealth Minister may also give remedial directions about plugging or closing off wells: see sections 586, 587, 591B and 594A (NOPSEMA directions) and sections 586A, 587A, 592 and 595 (responsible Commonwealth Minister directions) of the Act.

*Strict liability offence*

- (2) A titleholder commits an offence of strict liability if the titleholder contravenes subsection (1).  
Penalty: 100 penalty units

*Civil penalty provision*

- (3) A titleholder is liable to a civil penalty if the titleholder contravenes subsection (1).  
Civil penalty: 1,000 penalty units

Section 76 is self-explanatory and requires no guidance.

**Part 5: WOMP:**

**Section 77 Requirement to undertake activities in accordance with the well operations management plan**

*Requirement to carry out well activities in accordance with well operations management plan*

- (1) A titleholder contravenes this subsection if:
  - (a) the titleholder carries out a well activity, in relation to a well, in a particular way; and
  - (b) a well operations management plan is in force for the well that:
    - i. specifies a requirement that applies in relation to the activity; or
    - ii. is subject to a condition that applies in relation to the activity; and
  - (a) the titleholder does not carry out the activity in accordance with that requirement or condition; and
  - (b) before the titleholder begins carrying out the activity, NOPSEMA has not consented under subsection (2) to the titleholder carrying out the activity in that particular way.
- (2) For the purposes of paragraph (1)(d), NOPSEMA may consent, in writing, to a titleholder carrying out a well activity in a particular way if:
  - (a) the titleholder has requested, in writing, NOPSEMA's consent to carry out the activity in that way; and
  - (b) NOPSEMA reasonably believes, based on information in the request and any other information NOPSEMA considers relevant, that carrying out the activity in that way will not result in the integrity of the well becoming subject to a significant new risk or a significantly increased risk.

*Requirement to carry out well activities specified in well operations management plan*

- (3) A titleholder contravenes this subsection if:
  - (a) a well operations management plan that is in force for a well requires the titleholder to carry out a well activity in relation to the well; and
  - (b) the titleholder does not carry out the well activity.

Note 1: NOPSEMA may give directions to titleholders that may relate to a well activity and must be complied with despite anything in this instrument: see sections 574, 576B and 579A of the Act.

Note 2: NOPSEMA and the responsible Commonwealth Minister may also give remedial directions about plugging or closing off wells: see sections 586, 587, 591B and 594A (NOPSEMA directions) and sections 586A, 587A, 592 and 595 (responsible Commonwealth Minister directions) of the Act.

There must be a WOMP in force for a well activity prior to commencement of the activity and the activity must be conducted in accordance with the WOMP in force (subsection 77(1), (3) and (4)).

NOPSEMA recognises that there may be circumstances where a titleholder wants to undertake activities not contemplated in the WOMP in force on an urgent basis, e.g. to deal with the immediate aftermath of an emergency or other circumstances where the titleholder believes it is not practicable to revise the WOMP before undertaking the activity. In such cases, the titleholder must seek consent from NOPSEMA to undertake the activity in a manner that is different from the WOMP in force (subsection 77(2)).

It is NOPSEMA's policy to issue such consent only in extraordinary circumstances. Consent is unlikely to be issued in cases where NOPSEMA believes the titleholder could have but has not adequately planned for a foreseeable activity or other proposed change, or where NOPSEMA considers that revising the WOMP prior to undertaking the activity is reasonably practicable and appropriate.

Further, NOPSEMA is not permitted to provide consent unless it is satisfied that there will not be an occurrence of a significant new risk or a significant increase in an existing risk from the proposed work and the risks to well integrity are ALARP and of an acceptable level. The titleholder must therefore demonstrate that it has reviewed the risks associated with the proposed work and it meets this criterion specified by subsection 77(2)(b).

NOPSEMA's Guidance Note WOMP Content and Level of Detail describes the matters that must be taken into consideration in developing a WOMP for a well.

## 2.2. WOMP Submission

### *Division 3 – Obtaining acceptance of a well operations management plan*

#### **Part 5: WOMP:**

##### **Section 78 Application for acceptance of well operations management plan**

- (1) A titleholder may apply to NOPSEMA for acceptance by NOPSEMA of a well operations management plan.
- (2) The application must be made at least 30 days, or such lesser number of days approved by NOPSEMA in writing, before the proposed start of the first well activity to which the plan would apply.
- (3) The well operations management plan:
  - (a) must be submitted with the application; and
  - (b) must be in writing; and
  - (c) may apply to more than one well if the integrity of each well is subject to similar risks; and
  - (d) with the written approval of NOPSEMA—may be submitted in part.

Note: For the purposes of paragraph (3)(d), the titleholder may, for example, submit a plan that:

- (a) is proposed to apply to only some of the well activities the titleholder intends to carry out during the life of the well; or
- (b) applies to certain stages of well activities to which the plan is proposed to apply.

For a WOMP to be accepted by NOPSEMA, it must first be submitted to NOPSEMA by the titleholder (section 78).

New or revised WOMPs must be submitted in advance of commencement of the intended activity (e.g. well construction (drilling and completion), production / testing, workover / well intervention or abandonment). Sufficient time should be allowed for the assessment process and for potential further work if additional information is required by NOPSEMA. WOMPs submitted for acceptance may relate to one or more activities in the life of the well and may relate to more than one well and more than one title area, subject to the requirement that the risks to the integrity of each well and the kinds of monitoring processes and control measures that will be implemented for each well in a WOMP are 'similar'.

#### **Example**

A group of wells may be subject to similar risks, monitoring processes and control measures if they will encounter similar geological structures or pressures during well operations.



This form is available on the NOPSEMA website:  
**'N-04600-FM1600 WOMP Submission Coversheet'**

This form includes fields for the mandatory information and details relating to which well, part(s) in the life of the well to which the submission relates, and sections of the regulations under which the submission is made.

It is recommended that the titleholder includes a concordance table in the WOMP clearly indicating which section(s) of the WOMP address each requirement of the regulations.

## 2.3. Assessment and acceptance decision

### **Part 5: WOMP:**

#### **Section 79 Decision on well operations management plan**

##### *Initial consideration*

- (1) Within 30 days after a titleholder applies to NOPSEMA under section 78 for acceptance of a well operations management plan, NOPSEMA must:
  - (a) if NOPSEMA is reasonably satisfied that the plan meets the criteria in section 81 - accept the plan; or
  - (b) if NOPSEMA is not reasonably satisfied that the plan meets those criteria - give the titleholder written notice under subsection (2) of this section; or
  - (c) if NOPSEMA is unable to make a decision on the plan within the 30-day period - give the titleholder written notice of that fact and a proposed timetable for NOPSEMA's consideration of the plan.

##### *Notice that titleholder must resubmit plan*

- (2) A notice under this subsection must:
  - (a) state that NOPSEMA is not reasonably satisfied that the well operations management plan submitted or resubmitted by the titleholder meets the criteria in section 81; and
  - (b) identify the criteria about which NOPSEMA is not satisfied; and
  - (c) specify a day by which the titleholder may modify and resubmit the plan.
- (3) The day specified under paragraph (2)(c) must give the titleholder a reasonable opportunity to modify and resubmit the plan.

If NOPSEMA is not reasonably satisfied (after a maximum of two (2) requests for further written information (RFFWI), section 80), NOPSEMA may request the titleholder to resubmit the WOMP application, providing reasons why NOPSEMA is not satisfied that the criteria in section 81 have been met and nominate a proposed date for resubmission. The titleholder may alter this date after consultation and agreement with NOPSEMA.

If there are many un-met criteria, NOPSEMA may elect to bypass the RFFWI process and proceed directly to requesting the titleholder to resubmit the WOMP.

**Part 5: WOMP:**

**Section 79 Decision on well operations management plan**

*Consideration after opportunity for resubmission*

- (4) Within 30 days after the titleholder has resubmitted a modified well operations management plan (the *resubmitted plan*):
- (a) if NOPSEMA is reasonably satisfied that the resubmitted plan meets the criteria set out in section 81, NOPSEMA must accept the plan; or
  - (b) if NOPSEMA is still not reasonably satisfied that the resubmitted plan meets those criteria - NOPSEMA must:
    - (i) give the titleholder a further notice under subsection (2) of this section; or
    - (ii) refuse to accept the resubmitted plan; or
    - (iii) accept the resubmitted plan, subject to such conditions as NOPSEMA considers appropriate; or
    - (iv) accept the resubmitted plan in part, subject to such conditions (if any) as NOPSEMA considers appropriate; or
  - (c) if NOPSEMA is unable to make a decision on the resubmitted plan within the 30-day period - NOPSEMA must give the titleholder written notice of that fact and a proposed timetable for NOPSEMA's consideration of the resubmitted plan.

Note: For the purposes of subparagraph (b)(iv), NOPSEMA may accept the plan as applying only to certain well activities or certain stages of well activities.

*NOPSEMA decision where titleholder fails to resubmit modified plan*

- (5) If the titleholder does not resubmit a modified well operations management plan by the date referred to in paragraph (2)(c), or a later date agreed to by NOPSEMA in writing, NOPSEMA must:
- (a) refuse to accept the plan that was submitted by the titleholder under section 78 (the unmodified plan); or
  - (b) accept the unmodified plan, subject to such conditions as NOPSEMA considers appropriate; or
  - (c) accept the unmodified plan in part, subject to such conditions (if any) as NOPSEMA considers appropriate.

Note: For the purposes of paragraph (c), NOPSEMA may accept the plan as applying only to certain well activities or certain stages of well activities

**Part 5: WOMP:**

**Section 79 Decision on well operations management plan**

*Notice of decision*

- (6) NOPSEMA must give a titleholder written notice of the following decisions made by NOPSEMA in relation to a well operations management plan submitted by the titleholder:
- (a) a decision under paragraph (1)(a) or (4)(a) to accept the plan;
  - (b) a decision under subparagraph (4)(b)(ii) or paragraph (5)(a) to refuse to accept the plan;
  - (c) a decision under subparagraph (4)(b)(iii) or paragraph (5)(b) to accept the plan subject to conditions;
  - (d) a decision under subparagraph (4)(b)(iv) or paragraph (5)(c) to accept the plan in part (including subject to conditions).
- (7) The notice must set out:
- (a) for a decision mentioned in paragraph (6)(b)—the reasons for the decision; or
  - (b) for a decision mentioned in paragraph (6)(c) or (d):
    - (i) the reasons for the decision; and
    - (ii) the terms of the decision

*Validity of decision*

- (8) A decision by NOPSEMA under subsection (1) or (4) is not invalid merely because NOPSEMA did not comply with the 30-day period in mentioned in subsection (1) or (4).

Once NOPSEMA has assessed the resubmission and NOPSEMA is still not reasonably satisfied that the WOMP contents meets the criteria set out in section 81, NOPSEMA may request a further resubmission (4)(b)(i), refuse to accept the WOMP (4)(b)(ii) or accept the WOMP in part or subject to conditions (4)(b)(iii) and (4)(b)(iv).

Acceptance of a WOMP may be subject to conditions or limitations. However, it is NOPSEMA's policy to apply conditions and limitations only in extraordinary circumstances. Similarly, NOPSEMA may accept part of a WOMP for one or more activities in the life of the well and reject the rest of the WOMP. NOPSEMA is only likely to do this where the part to be accepted is distinct and such acceptance will not introduce any ambiguity as to the scope of the WOMP in force.

**Part 5: WOMP:**

**Section 80 Further information on submitted plan**

- (1) If a titleholder submits a well operations management plan under section 78 or resubmits a plan in response to a notice under subsection 79(2), NOPSEMA may request the titleholder to provide further written information about any matter that is required under section 82 to be included in a well operations management plan.
- (2) The request must:
  - (a) be in writing; and
  - (b) set out each matter for which information is requested; and
  - (c) specify a reasonable period within which the information is to be provided.
- (3) If a titleholder receives a request, and provides information requested by NOPSEMA within the period specified, or within a longer period agreed to by NOPSEMA in writing, the information is taken to have been included in the submitted or resubmitted well operations management plan.

During the assessment process, NOPSEMA may seek further written information from the titleholder about any matter required by the regulations to be included in the WOMP.

Each request for further written information must be in writing. It is NOPSEMA's policy to limit requests for further written information to a maximum of two (2) requests for new and revised WOMPs.

Information received from the titleholder within the specified period becomes part of the WOMP as if it had been included within the WOMP as originally submitted to NOPSEMA. Depending upon the nature of the further written information requested and received, NOPSEMA may request the titleholder to include this further written information in a complete updated version of the WOMP. If the requested written information is not provided to NOPSEMA within the specified period, this will generally lead to NOPSEMA deciding on acceptance or refusal of the WOMP based on the information already received. NOPSEMA requests for further written information from the titleholder may lead to delays in an acceptance decision.

NOPSEMA must accept the WOMP if it is appropriate to the well(s) and it complies with the requirements of section 81 of Division 3 of Part 5 of the regulations – contents of well operations management plan.

**Part 5: WOMP:**

**Section 81 Criteria for acceptance of a well operations management plan**

**Section 82 Contents of well operations management plan**

Guidance on section 81 and 82 is addressed in the separate guidance note – N-04600-GN1602 – WOMP Content and Level of Detail.

## **2.4. When is the submission of a revised WOMP required?**

### ***Division 4 – Revision of well operations management plan***

Titleholders are required to submit a revised WOMP to NOPSEMA under circumstances arising in accordance with sections 83, 84, 85, and 87. The requirements of these regulations can be categorised

respectively as: 'change of circumstances', 'NOPSEMA direction', 'request by NOPSEMA' and 'revision after five years'. In relation to 'change of circumstances', a revised WOMP must be submitted as soon as practicable after the titleholder becomes aware the integrity of the well has or may become subject to a significant new risk or significantly increased risk.

**Part 5: WOMP:**

**Section 83 Revision based on circumstances**

*Revision before start of new well activities*

- (1) A titleholder must submit to NOPSEMA a proposed revision of the well operations management plan that is in force for a well before carrying out a well activity, in relation to the well, if the plan does not cover the well activity.

Note 1: A titleholder contravenes subsection 76(1) if the titleholder carries out a well activity and there is no well operations management plan in force that covers the well and well activity.

Note 2: A plan may have originally been submitted in part or only accepted in part: see section 78 and 79.

*Revision before significant change to management of well integrity risks*

- (2) A titleholder contravenes this subsection if:
- (a) the titleholder makes a significant change to the manner in which risks to the integrity of a well are reduced to as low as reasonably practicable; and
  - (b) before making that change, the titleholder did not submit to NOPSEMA a proposed revision of the well operations management plan that is in force for the well that provides for the significant change.

Note: The titleholder must carry out activities in accordance with the well operations management plan in force for the well, unless NOPSEMA has consented to the titleholder carrying out an activity in a particular way: see section 77.

*Strict liability offence*

- (3) A titleholder commits an offence of strict liability if the titleholder contravenes subsection (2).

Note: This subsection is a continuing offence under section 4K of the Crimes Act 1914. See section 237 of this instrument for the maximum penalty for each day that an offence under this subsection continues.

Penalty: 100 penalty units

*Civil penalty provision*

- (4) A titleholder is liable to a civil penalty if the titleholder contravenes subsection (2).

Note: This subsection is a continuing civil penalty provision under section 93 of the Regulatory Powers Act. See section 237 of this instrument for the maximum civil penalty for each day that a contravention referred to in this subsection continues.

Civil penalty: 1,000 penalty units

**Part 5: WOMP:**

*Revision after new risk has arisen*

- (5) A titleholder contravenes this subsection if:
- (a) the integrity of a well in the title area becomes subject to a significant new risk or a significantly increased risk; and
  - (b) as soon as practicable after the circumstance in paragraph (a) arises, the titleholder does not submit to NOPSEMA a proposed revision of the well operations management plan that is in force for the well that addresses the risk.

*Strict liability offence*

- (6) A titleholder commits an offence of strict liability if the titleholder contravenes subsection (5).  
Penalty: 100 penalty units

*Civil penalty provision*

- (7) A titleholder is liable to a civil penalty if the titleholder contravenes subsection (5).  
Civil penalty: 1,000 penalty units

If the titleholder becomes aware that the WOMP in force does not adequately reflect activities conducted or proposed to be conducted in a title area covered by the WOMP, the titleholder must submit an appropriately revised WOMP to NOPSEMA for acceptance before commencing such activities.

**Example**

Revision based on circumstances:

- (1) The WOMP “in force” covers the well construction activities and the next activity in the life of the well(s) is the production activity, and this activity is not covered in the WOMP, the WOMP must be revised to include this activity.
- (2) The WOMP “in force” covers the monitoring of a suspended well and the titleholder has decided to permanently abandon the well, the WOMP must be revised to include this activity.

**Part 5: WOMP:**

**Section 84 Revision based on directions**

*Revision if direction is inconsistent with well operations management plan*

- (1) A titleholder contravenes this subsection if:
  - (a) either or both of the following apply
    - (i) NOPSEMA gives the titleholder a direction under section 574, 576B, 579A, 586 or 591B of the Act that is inconsistent with a well operations management plan for a well in the title area;
    - (ii) the responsible Commonwealth Minister gives the titleholder a direction under section 586A or 592 of the Act that is inconsistent with a well operations management plan for a well in the title area; and
  - (b) the titleholder does not, as soon as reasonably practicable after receiving the direction, submit to NOPSEMA a proposed revision of the plan for the purposes of removing the inconsistency.

Note: To be accepted, the proposed revision must be consistent with the direction: see subsection 89(2).

*Strict liability offence*

- (2) A titleholder commits an offence of strict liability if the titleholder contravenes subsection (1).

Penalty: 50 penalty units

*Civil penalty provision*

- (3) A titleholder is liable to a civil penalty if the titleholder contravenes subsection (1).

If the titleholder is issued a direction by either NOPSEMA or the responsible Commonwealth Minister and the work activity is not covered by the WOMP then the titleholder would be in breach of section 76. Therefore, the titleholder must submit a revised WOMP to cover the work activity.

**Part 5: WOMP:**

**Section 85 Revision required by NOPSEMA**

- (1) NOPSEMA may give a titleholder a written notice requiring the titleholder to submit a proposed revision of the well operations management plan that is in force for a well in the title area if NOPSEMA considers that the plan no longer meets the criteria in section 81.
- (2) The notice must set out the following:
  - (a) the matters to be addressed by the revision;
  - (b) the reasons for requiring the revision;
  - (c) the period within which the titleholder must submit the revision;
  - (d) the effect of section 86.

NOPSEMA may request a titleholder to submit a revised WOMP. This may occur if deficiencies are identified in the WOMP in force because of an inspection or an incident investigation. It may also occur if NOPSEMA believes the WOMP in force does not adequately reflect activities conducted or proposed to be conducted in a title area covered by the WOMP.

A written request by NOPSEMA to revise a WOMP must specify the matters to be addressed by the revision, the proposed date of effect of the revision and the grounds for the request.

It should also be noted that a request for a revised WOMP may be accompanied by other enforcement measures.

**Part 5: WOMP:**

**Section 86 Revision required by Regulator – objection to requirement**

- (1) If NOPSEMA gives a titleholder a notice under section 85, the titleholder may give an objection, in writing, to NOPSEMA:
  - (a) stating one or more of the following:
    - (i) that the revision is not required;
    - (ii) that the revision should not address the matters set out in the notice or should address different matters;
    - (iii) that the period within which the titleholder must submit a revision should be a longer period than that specified in the notice; and
  - (b) giving reasons for the objection.
- (2) The titleholder must give the objection to NOPSEMA within:
  - (a) 21 days after receiving the notice; or
  - (b) If NOPSEMA, in writing, agrees to a longer period within which the objection must be given – that period.
- (3) NOPSEMA must, within 30 days after receiving the objection, decide whether to accept or reject the objection
- (4) NOPSEMA must notify the titleholder, in writing, of the following matters as soon as practicable after making a decision:
  - (a) the terms of the decision, including:
    - (i) whether the original notice given under section 85 is varied or withdrawn; and
    - (ii) if the original notice is varied – the new requirements;
  - (b) if the decision is to reject the objection – the reason for the decision.

If NOPSEMA requests a titleholder to submit a revised WOMP, the titleholder may make an objection to the requirement in accordance with section 86.

**Part 5: WOMP:**

**Section 87 Revision at end of each 5-year period**

- (1) A titleholder contravenes this subsection if the titleholder does not submit to NOPSEMA a proposed revision of the well operations management plan that is in force for a well in the title area at least 14 days before the end of the period of 5 years that begins on the later of the following days:
  - (a) the day NOPSEMA first accepts the plan;
  - (b) the day NOPSEMA accepts the latest proposed revision of the plan submitted under this section;
  - (c) if NOPSEMA gives a notice to the titleholder under subsection (2) – the day specified in the notice.
- (2) For the purposes of paragraph (1)(c), if NOPSEMA accepts a proposed revision of a well operations management plan that was submitted by a titleholder under section 83, 84 or 85, NOPSEMA may, by written notice given to the titleholder, notify the titleholder that the period of 5 years mentioned in subsection (1) begins on the day specified in the notice.

*Strict liability offence*

- (3) A titleholder commits an offence of strict liability if the titleholder contravenes subsection (1).

The titleholder must submit a revised WOMP to NOPSEMA every five years after the original WOMP acceptance (section 87). A revised WOMP submitted and accepted because of a change of circumstances or operations, or because NOPSEMA has requested a revision, does not trigger its own new five-yearly WOMP revision cycle unless explicitly agreed by NOPSEMA, in accordance with subsection 87(2).

It is recommended that titleholders incorporate the requirement to conduct a five-yearly review and revision of their WOMPs into their internal processes. These internal processes should ensure that the review and revision commence in a timely manner.

A revised WOMP submitted after five years should focus on the ongoing validity of the technical and other control measures identified by previous risk assessments. As part of this process, the titleholder should revisit assumptions made in the previous WOMP submission(s). The revision should also include any relevant responses submitted by the titleholder in relation to previous NOPSEMA written requests for further information that have not already been included in the WOMP.

The WOMP revision must be received by NOPSEMA at least 14 days prior to the fifth anniversary of the previous WOMP acceptance.

### Example

Revision of a WOMP after five (5) years:

1. As a production well ages the reservoir fluid constituent parts may change e.g. increase water cut, scale, asphaltenes. The five (5) year revision must address such gradual changes which may have affected the risk profile, performance standards and control measures.
2. A well or wells may have been permanently abandoned during the five-year period in force and the five (5) year revision must be updated to remove these wells from the WOMP.

A WOMP may be submitted and accepted for a campaign of well activities. However, the risk profile may change as the campaign progresses in which case a revision should be submitted if there is a significant new risk or a significant increase in risk to the integrity of the well(s).

### Examples

A revision due to significant new risk or a significant increase in risk:

1. A production well may be deepened or side-tracked into a new formation.
2. The casing design may change to reflect changes in actual formation pressures encountered.
3. Artificial lift / injection wells not previously contemplated may be introduced.
4. Changes to completion design based on new reservoir information.
5. Water injection may have introduced increased formation pressure "hot spots" with associated new or increased risk.

The WOMP should be sufficiently detailed and comprehensive to cover foreseeable circumstances and contingencies. Requirements for deviations may sometimes be of a minor nature that may be adequately addressed through the titleholder's management of change (MoC) system.

A WOMP should be continuously reviewed and improved. NOPSEMA recognises that titleholders may amend WOMPs between formal WOMP revisions as a result of continuous improvement, without the need for formal submission and acceptance. However, it should be noted that the WOMP in force is the WOMP accepted by NOPSEMA. Therefore, titleholders should ensure that any proposed amendment to the WOMP which meets a criterion for change of circumstances or operations specified in section 83 is submitted to NOPSEMA as a formal revision to the WOMP.

As the titleholder must not conduct activities in a manner which is contrary to the WOMP, a formal revision must be submitted and accepted prior to conducting an activity that is not covered by the WOMP in force.

**Example**

Change that may be dealt with by a titleholder's general MoC process:

- Setting of a casing string deeper than planned due to a difference in geological formation depth from the prognosis.

Note the importance of ensuring that the new casing setting depth does not infringe the casing design safety factors or kick tolerance stipulated in the WOMP thereby triggering a revision to the WOMP under section 83.

The WOMP should clearly describe the titleholder's MoC process and include consideration of the WOMP revision triggers set out in section 83, noting that utilisation of the titleholder's MoC process does not abrogate a regulatory requirement to revise the WOMP.

**Part 5: WOMP:**

**Section 88 Form of proposed revision**

A proposed revision a well operations management plan must:

- b. be in the form of a revised well operations management plan; or
- c. if the titleholder and NOPSEMA agree—be in the form of a revised part of a well operations management plan.

The regulations provide for a 30-day assessment period for revised WOMPs and allow NOPSEMA to extend this time frame if it is unable to arrive at a decision (section 79). In line with WOMP submissions, the revised WOMP submission must include the details required by section 81 and 82.

A proposed revision must be in the form of a complete revised WOMP or, if the titleholder and NOPSEMA agree, a revised part of the WOMP as required by section 88.

## 2.5. Acceptance of revised well operations management plan

### **Part 5: WOMP:**

#### **Section 89 Application of Division 3 to a revised well operations management plan**

- (1) If a titleholder is required to submit a proposed revision of a well operations management plan to NOPSEMA under this Division, section 79, 80, 81 and 82 apply to the proposed revision as if:
  - (a) a reference in those sections to submitting, acceptance or refusing to accept a well operations management plan were a reference to submitting, acceptance or refusing to accept the proposed revision; and
  - (b) any other reference in those sections to the well operations management plan were a reference to the plan as revised by the proposed revision.

Note: Those regulations deal with the consideration and acceptance of a well operations management plan.

- (2) If the proposed revision is required under section 84, section 81 applies as if a criterion for the acceptance of the proposed revision is that the proposed revision is consistent with the direction mention in section 84.

Note: Section 84 requires a titleholder to submit a proposed revision of a well operations management plan if NOPSEMA or the responsible Commonwealth Minister gives the titleholder a direction which is inconsistent with the plan.

Section 89 applies the requirements of section 79, 80 and 81 (which deal with the process and requirements for WOMP assessment and acceptance) to proposed WOMP revisions.

### **Part 5: WOMP:**

#### **Section 90 Effect of non-acceptance of proposed revision**

If a proposed revision of a well operations management plan is not accepted by NOPSEMA, the plan that was in force before the proposed revision was submitted remains in force, subject to the Act and this Part, as if the revision had not been proposed.

Regulation 5.16 is self-explanatory and requires no guidance.

### 3. End of WOMP

#### *Division 5 – End of WOMP*

##### **Part 5: WOMP:**

##### **Section 73(2)**

A well operations management plan ceases to be in force under this subsection if:

- (a) the titleholder permanently abandons the well or wells covered by the plan; and
- (b) the titleholder gives NOPSEMA a written report of:
  - (i) the process that was carried out in abandoning the well or wells, and
  - (ii) the outcome of that process; and
- (c) NOPSEMA notifies the titleholder in writing that NOPSEMA is reasonably satisfied that the process of abandoning the well or wells has been carried out accordance with the well operations management plan.

The operation of a WOMP ends when:

- The titleholder has provided a written report to NOPSEMA of the process by which the permanent abandonment has been carried out for each well and provided details of the outcome of the abandonment process for each well; and
- NOPSEMA has notified the titleholder that it is reasonably satisfied that the process of abandoning the well(s) has been undertaken in accordance with the WOMP; and
- The titleholder has permanently abandoned all the wells encompassed by the WOMP.

The written report(s) should include a summary description of the abandonment operations, the objectives including the nature of formations to be isolated, verified outcomes achieved and any deviations from the plan supported by a summary of relevant MoC and risk reviews, including relevant third-party reports.

The report should detail:

- All the formations with flow potential that need to be isolated
- Actual depths of formation tops, hydrocarbon zones, permeable zones and the impermeable formation(s) that in combination with the installed barriers isolates formations with flow potential
- Actual depths of casing shoes, liner top/shoe and completion components remaining in the well
- Actual or calculated top and bottom depths of the installed barriers (e.g. cement plugs) inside the casing and in the well annuli. Methodology for determining annulus barrier depths for example cement displacement calculations or cement bond logs
- How the barrier(s) was installed and how installation of a quality barrier was ensured
- Details of the well annuli pressure behaviour to demonstrate whether annulus cement is sealing or not
- Verification methods used to assure the integrity of the installed barriers (e.g. internal cement plugs) and for those barriers previously in place (e.g. production casing cement verification). This should

include criteria such as barrier test pressure, pressure test mud weight, barrier tag depth and barrier tag weight.

- Data to demonstrate barrier fracture integrity such as pore pressure gradient, fracture pressure gradient and leak off test data. The pore pressure should account for pore pressure changes subsequent to well abandonment.

The abandonment report should include a final abandonment schematic and a diagram detailing the full well barrier envelope. The written report for permanent abandonment of a well is assessed against the WOMP description of the arrangements that will be in place for abandonment of the well. Section 82 outlines the well abandonment content in the WOMP:

**Part 5: WOMP:**

**Section 82 Content of well operations management plan**

*Suspension and permanent abandonment*

- (9) A well operations management plan must include a description of the arrangements that will be in place for suspension and permanent abandonment of the well, showing the following:
- (a) how, during the process of suspending or abandoning the well, risks to the integrity of the well will be reduced to as low as reasonably practicable;
  - (b) how the actions taken during that process will ensure that the integrity of the well is maintained while the well is suspended or abandoned;
  - (c) if the titleholder is a petroleum exploration permittee, a petroleum retention lessee or an infrastructure licensee—how the titleholder will, in the process of suspending or abandoning the well:
    - (i) comply with the applicable requirements under subsection 569(1) of the Act (about work practices) to which the titleholder is subject; and
    - (ii) satisfy paragraphs 270(3)(d), (e) and (f) of the Act (about consent to surrender a title);
  - (d) if the titleholder is a petroleum production licensee—how the titleholder will, in the process of suspending or abandoning the well:
    - (iii) comply with the applicable requirements under subsections 569(1) and 570(1) of the Act (about work practices) to which the titleholder is subject; and
    - (iv) satisfy paragraphs 270(3)(d), (e) and (f) of the Act (about consent to surrender a title);
  - (e) if the titleholder is a greenhouse gas assessment permittee, a greenhouse gas holding lessee or a greenhouse gas injection licensee—how the titleholder will, in the process of suspending or abandoning the well:
    - (v) comply with the applicable requirements under subsection 570(1) of the Act (about work practices) to which the titleholder is subject; and
    - (vi) satisfy paragraphs 442(3)(d), (e) and (f) of the Act (about consent to surrender a title).

For section 82 to be fulfilled, the WOMP needs to include sufficient detail to demonstrate that well integrity will be maintained during and after the process of suspending or abandoning the well.



This form is available on the NOPSEMA website for well abandonment submissions:  
**'N-04600-FM1634 Well Abandonment Report Submission Coversheet'**

This form includes fields for the mandatory information relating to the well(s) and regulation(s) under which the submission is made.

## 4. Withdrawal of acceptance

### *Division 5 – Withdrawal of acceptance of well operations management plan*

#### **Part 5: WOMP:**

##### **Section 91 Withdrawal of acceptance**

NOPSEMA may withdraw its acceptance of a titleholder's well operations management plan if:

- (a) the titleholder has not complied with any of the following:
  - (i) a provision of the Act;
  - (ii) a provision of this instrument;
  - (iii) a direction given under section 574, 576B, 579A, 586, 586A, 591B or 592 of the Act;
  - (iv) a requirement of the well operations management plan;
  - (v) a condition to which NOPSEMA's acceptance of the plan was made subject under section 79; or
- (b) NOPSEMA is satisfied for any other reason that its acceptance of the well operations management plan should be withdrawn.

NOPSEMA may withdraw acceptance of a WOMP if a titleholder has not complied with section 91 of the regulations. Before withdrawing the acceptance of a WOMP for a well, NOPSEMA must give the titleholder at least 30 days' notice in writing of its intention to withdraw the acceptance. NOPSEMA must also give the titleholder the opportunity to make a written submission in relation to the matters NOPSEMA should consider when deciding whether to withdraw acceptance. NOPSEMA must then either withdraw acceptance of the WOMP or decide not to do so, in accordance with sections 92 and 93.

On withdrawal of acceptance of a WOMP, the titleholder must make the well(s) safe as soon as reasonably practicable and then cease the activities previously encompassed by the WOMP that would no longer be in force. If acceptance of a WOMP is withdrawn, the titleholder may submit a new WOMP for acceptance in accordance with the regulations. Note that any such submission is not a submission of a revised WOMP, as a revised WOMP may only be submitted where there is still a WOMP in force.

**Part 5: WOMP:**

**Section 92 Notice of proposal to withdraw acceptance**

- (1) NOPSEMA must not withdraw its acceptance of a titleholder's well operations management plan under section 91 unless NOPSEMA:
  - (a) has notified the titleholder in writing that NOPSEMA is proposing to withdraw the acceptance; and
  - (b) has included in the notice:
    - (i) The reasons for the proposed withdrawal; and
    - (ii) a day by which the titleholder must give any submissions to NOPSEMA in relation to the proposed withdrawal; and
    - (iii) any other information that NOPSEMA considers appropriate; and
  - (c) has had regard to any submissions given to NOPSEMA by the titleholder in accordance with subparagraph (b)(ii).
- (2) The day specified under subparagraph (1)(b)(ii) must be at least 30 days after the day the notice is given.
- (3) The Regulator may give a copy of the notice to a person other than the titleholder if the Regulator considers it appropriate.

Section 92 is self-explanatory and requires no guidance.

**Part 5: WOMP:**

**Section 93 Decision on proposal to withdraw acceptance**

- (1) If NOPSEMA notifies a titleholder under subsection 92(1), NOPSEMA must, as soon as practicable after the day specified in the notice:
  - (a) decide to withdraw its acceptance of the well operations management plan under section 91; or
  - (b) decide not to withdraw its acceptance.

Section 93 is self-explanatory and requires no guidance.

**Part 5: WOMP:**

**Section 94 Withdrawal does not affect well that is not operational**

A decision by NOPSEMA to withdraw its acceptance of a well operations management plan has no effect in relation to a well that is not operational at the time of the decision, to the extent that the plan deals with the period that the well is not operational.

Note: For the purposes of this instrument, a titleholder is taken to be carrying out a well activity in relation to a well if the well is not operational (but not permanently abandoned): see section 75.

Section 94 is self-explanatory and requires no guidance.

**Part 5: WOMP:**

**Section 95 Relationship between withdrawal and other provisions**

- (1) NOPSEMA may withdraw its acceptance of a well operations management plan for the titleholder, even if either or both of the following apply:
  - (a) the titleholder has been convicted of an offence because of a failure to comply with a provision of the Act, this instrument or any other regulations made under the Act;
  - (b) the titleholder has been found liable to a civil penalty because of a failure to comply with a provision of the Act, this instrument or any other regulations made under the Act.
- (2) If NOPSEMA withdraws its acceptance of a well operations management plan, the withdrawal does not prevent either or both of the following apply:
  - (a) the titleholder being convicted of an offence because of a failure to comply with a provision of the Act, this instrument or any other regulations made under the Act;
  - (b) the titleholder being found liable to a civil penalty because of a failure to comply with a provision of the Act, this instrument or any other regulations made under the Act.

Section 95 is self-explanatory and requires no guidance.

## 5. Advance notice information about specific well activities

### *Division 6 – Annual well integrity reports and information about particular well activities*

#### **Part 5: WOMP:**

#### **Section 97 Well activities for which advance notice is required**

##### *Activities requiring 21 days' notice*

- (1) A titleholder contravenes this subsection if:
- (a) the titleholder starts carrying out any of the following well activities:
    - (i) a well activity that involves drilling formation;
    - (ii) a well activity that involves running tubular goods into a well or recovering tubular goods from a well;
    - (iii) a well activity that involves removing a Christmas tree, tubing spool, casing spool or casing head from a well;
    - (iv) a well activity that involves installing a Christmas tree saver for use with downhole operations or well testing;
    - (v) a well activity that changes the performance standards or barrier elements used to maintain the integrity of a well; and
  - (b) the titleholder did not notify NOPSEMA, in accordance with subsection (3), of the proposal to carry out the well activity at least:
    - (i) 21 days before the start of the well activity; or
    - (ii) a lesser number of days before the start of the well activity as agreed to by NOPSEMA.

Section 97 requires the titleholder to notify NOPSEMA before the commencement of specific well activities. Such notifications do not require NOPSEMA's approval for the titleholder to commence a well activity. Activities to be notified fall into one of two categories: those which must be notified to NOPSEMA 21 days in advance of starting the activity and those which are required to be notified at any time prior to the start of the activity. A separate notice of activity is required for each well and each occasion of well activity. The onus remains on the titleholder to ensure that the proposed activity is in accordance with the WOMP in force. A single notice of well activity may encompass multiple continuous activities for a single well, e.g. drill, test and abandon. NOPSEMA may request further information in writing under section 97(4) if the titleholder has not provided complete or sufficiently detailed information about the activity to NOPSEMA.

If the notification details an activity contemplated in the WOMP in force but the activity is subject to a significant new or significantly increased risk, the titleholder must submit a revision to the WOMP. If the information in the well activity notification is no longer accurate, the titleholder must provide NOPSEMA with an updated notification as soon as practicable.

NOPSEMA will only agree to a shorter notice period for a notification (section 97(1)(b)(ii)) in extraordinary circumstances and when the titleholder has submitted the request in writing.

**Example**

Activities requiring 21 days' notice:

- drilling and completion operations
- workovers utilising a rig or workover unit
- removal of Christmas tree, wellheads and associated barriers
- well testing
- plug and abandonment operations.

**Part 5: WOMP:**

**Section 97 Activities requiring notice at any time before start of activity**

*Activities requiring notice at any time before start of activity*

(2) A titleholder contravenes this subsection if:

(a) the titleholder starts carrying out any of the following well activities:

- (i) a well activity, not covered by subsection (1), that involves perforation or tubing punching;
- (ii) a well activity, not covered by subsection (1), that involves installing, removing or locking open of a downhole safety valve, storm choke valve, gas-lift valve or injection valve;
- (iii) a well activity, not covered by subsection (1), that involves the installing of a Christmas tree saver for use during maintenance work on Christmas tree components; and

(b) before starting to carry out the activity, the titleholder did not notify NOPSEMA, in accordance with subsection (3), of the proposal to carry out the activity.

**Example**

Activities requiring notice at any time before starting of activity:

- perforating and tubing punch operations and associated work through Christmas tree without a rig or workover unit
- installation, removal or lock open of SCSSSV, SSCSSV, storm choke, gas-lift or injection valves, through Christmas tree without a rig or workover unit
- installation of a Christmas tree saver for use during maintenance work on Christmas tree components.

Note that activities that are not encompassed by section 97(1) or 97(2) are not required to be notified to NOPSEMA.

**Example:**

Standalone activities not requiring notice before starting of activity:

- slickline investigation work e.g. LIB (lead impression block) run, gauge run, etc.
- slickline operations e.g. bailer runs, wireline fishing operations, running wireline isolation plugs in tubing or tubing nipples
- through tubing E-line logging operations e.g. investigative logs: caliper logs, spinner production logging tool, etc.
- through tubing stimulation e.g. acid wash
- pressure testing of the well barrier elements e.g. tubing, annuli, packers, wellhead and Christmas tree components.

**Part 5: WOMP:**

**Section 97 Well activities for which advance notice is required**

*Form of notice*

(3) For the purposes of subsections (1) and (2), notice of a well activity must be in writing and include the following information:

- (a) information that identifies the well operations management plan for the well;
- (b) a description of the well, including the proposed or existing well name and number, the location of the well and the water depth at that location;
- (c) the name of the facility from which the well activity will be carried out;
- (d) the name of the operator of the facility;
- (e) a description of the well activity, including the objective, key elements, milestones and programmed depths;
- (f) a list of any documents that have been prepared for the management, control or operation of the well activity;
- (g) the timetable for carrying out and completing the activity.

Section 97(3)(a) to (d) are self-explanatory and require no guidance.

Section 97(3)(e) requires a description of the well activity, including the objective, key elements, milestones and programmed depths. Examples of how this requirement may be met are listed below. Note that the titleholder may also supply additional information that it deems relevant.

Example information to be provided for a drilling activity notification:

2. Objective of the activity: target reservoirs / horizons, their nature, predicted pore pressure, temperature, permeability and particulars of the geological strata and formations and of fluids within them, and any risks with the potential to cause a failure of well integrity that may be present.
3. Particulars, with suitable diagrams, of the directional path of the well-bore, its terminal depth and location; and its position relative to nearby wells.
4. The procedures for effectively monitoring the direction of the well-bore and for minimising the likelihood and effects of intersecting nearby wells.
5. A description of the design of the well (including casing cement placement), including the limits on its safe operation and use.
6. Particulars of the fluids to be used to control the pressure of the well.

A 'well montage' is commonplace in the industry and this type of presentation may satisfy the information required in points 1 – 5.

In the case of a drilling activity starting from an existing well, some additional information would be required:

1. Pre and post operations diagram of the well status.
2. The well integrity status of the well: e.g. annuli pressures, tubing or casing leaks, corrosion / erosion concerns, casing and tubing wear, casing cement heights, details of previously abandoned legs, etc.
3. The current operational state of the well e.g. suspended, production, artificial lift and the intended operational state.

A 'well montage' may also satisfy these requirements.

In the case of a workover or other intervention activity, it is suggested to include:

1. The objective of the activity
2. Pre and post diagram of the well status
3. A summary of the intervention activities to be performed
4. Summary of relevant previous operations in relation to the well and its well integrity status e.g. annuli pressures, tubing or casing leaks, corrosion / erosion concerns
5. The purpose for which the well has been used e.g. production, injection, artificial lift.

Section 97(3)(f) requires a list of any documents that have been prepared for the management, control or operation of the particular well activity.

**Example**

Documents that have been prepared for management, control or operation of a particular well activity include but not limited to:

- geological prognosis and / or geological program
- drilling, testing, abandonment, workover or well intervention programs
- relief well drilling contingency plan, cap and contain plan or any other plan to regain control of the well.

NOPSEMA does not require these documents to be submitted as part of the notice of the well activity. However, these documents may be requested as part of a NOPSEMA inspection.

**Part 5: WOMP:**

**Section 98 Updating information given about a well activity**

- (1) A titleholder contravenes this subsection if:
- (a) the titleholder notifies NOPSEMA under section 97 about a proposal to carry out a well activity; and
  - (b) at a time (the trigger time) before the titleholder starts carrying out the well activity, the information in the notice is no longer accurate, in relation to a matter, in a material respect; and
  - (c) the titleholder does not provide NOPSEMA with accurate written information in relation to that matter:
    - (i) as soon as practicable after the trigger time; and
    - (ii) at a time that provides NOPSEMA with a reasonable opportunity to consider the information before the commencement of the activity.
- (2) Subsection (1) does not apply if the reason why the information is no longer accurate is because the integrity of the well is subject to a significant new risk or a significantly increased risk.

Note: A significant new risk or a significantly increased risk requires a revision of the well operations management plan for the well: see subsection 83(5).

*Strict liability offence*

- (3) A titleholder commits an offence of strict liability if the titleholder contravenes subsection (1).

Penalty: 50 penalty units.

*Civil penalty provision*

- (4) A titleholder is liable to a civil penalty if the titleholder contravenes subsection (1).

Section 98 provides that the titleholder must inform NOPSEMA if there is a change in the well activity. If the change reflects a significant new or significantly increased risk to the integrity of the well, the titleholder must submit a revision to the WOMP under subsection 83(5).

Section 97(4) allows for NOPSEMA to request further information in writing. Such a request may prohibit commencement of the planned activity and may lead to the initiation of a NOPSEMA inspection.

**Example**

Change from the notice about a well activity:

- Information from a recently drilled offset well may have changed the pore pressure prediction significantly for the well subject to the notification. If this change has affected the casing / completion design significantly the WOMP may need to be revised.
- If information in the “Notice of a well activity” section 97(3) has changed e.g. well name, drilling rig, etc. the titleholder must inform NOPSEMA as soon as practicable.

**Part 5: WOMP:**

**Section 99 Completion of notified well activity**

*Notice of completion of notified well activity*

- (1) A titleholder contravenes this subsection if:
- (a) the titleholder was required to notify NOPSEMA of the proposal to carry out a well activity under section 97; and
  - (b) the titleholder completes the well activity; and
  - (c) the titleholder does not notify NOPSEMA of the completion:
    - (i) in writing; and
    - (ii) within 10 days of the completion.

*Change to design, construction or operation of well*

- (2) A titleholder contravenes this subsection if:
- (a) the titleholder was required to notify NOPSEMA of the proposal to carry out a well activity under section 97; and
  - (b) the titleholder completes the well activity; and
  - (c) the well activity resulted in a material change to the design, construction or operation of the well; and
  - (d) the titleholder does not give NOPSEMA a written description of the change, in writing, within 30 days of the completion.

*Strict liability offence*

- (3) A titleholder commits an offence of strict liability if the titleholder contravenes subsection (1) or (2).

Note: This subsection is a continuing offence under section 4K of the Crimes Act 1914. See section ^237 of this instrument for the maximum penalty for each day that an offence under this subsection continues.

Penalty: 50 penalty units.

*Civil penalty provision*

- (4) A titleholder is liable to a civil penalty if the titleholder contravenes subsection (1) or (2).

Note: This subsection is a continuing civil penalty provision under section 93 of the Regulatory Powers Act. See section ^237 of this instrument for the maximum civil penalty for each day that a contravention referred to in this subsection continues.

Civil penalty: 500 penalty units.

Section 99 is self-explanatory and requires no guidance.



This form is available on the NOPSEMA website:  
**'N-04600-FM1618 Notification of Activity Submission Coversheet'**

This form includes fields for the mandatory information and details relating to which WOMP, title and well, part(s) in the life of the well to which the notification relates, and regulation(s) under which the notification is made.

## 6. Critical factors for success

- Any WOMP or revised WOMP is submitted at least 30 days prior to the proposed commencement of well activities.
- The WOMP fully complies with the requirements of the regulations, especially section 81 and 82 prior to submission.

Note: inclusion of a concordance table indicating which sections of the WOMP address each of these WOMP contents requirements is helpful to show that all the relevant regulations have been addressed.

- An activity requiring 21 days advance notice (section 97(1)) is submitted in a timely manner with the information required in subsection 97(3).
- An activity requiring notice at any time before the start of the activity, subsection 97(2), with the information required in subsection 97(3).

## 7. Contact details

For more information regarding this guidance note, please contact NOPSEMA:

Telephone: +61 (0)8 6188 8700; or

E-mail: [wompguidance@nopsema.gov.au](mailto:wompguidance@nopsema.gov.au)