
From: [REDACTED]
Sent: Friday, 29 November 2019 7:12 PM
To: [REDACTED]
Subject: RE: Notice - Petroleum Environmental Inspection Brief - Schlumberger Otway Basin 2DMSS [SEC=UNCLASSIFIED]
Attachments: Brief - Petroleum Environmental Inspection Brief.pdf

UNCLASSIFIED

Dear [REDACTED]

Please see attached revised inspection brief with the inclusion of a biosecurity topic, slight adjustment to the indicative agenda and a change of date.

Please let me know if you have any questions, otherwise speak to you on Wednesday 3 Dec.

Regards

[REDACTED]



[REDACTED] Environment Specialist
[REDACTED]

National Offshore Petroleum Safety and Environmental Management Authority
[REDACTED] | [W: nopsema.gov.au](http://www.nopsema.gov.au)

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From: [REDACTED]
Sent: Monday, 18 November 2019 4:25 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Notice - Petroleum Environmental Inspection Brief - Schlumberger Otway Basin 2DMSS [SEC=UNCLASSIFIED]

UNCLASSIFIED

Dear [REDACTED]

Please find attached NOPSEMA's inspection brief for the Otway Basin 2D MSS (inspection ID 2101). The brief outlines the inspection process, scopes and indicative agenda.

Please give me a call if you have any questions, otherwise I'll be in touch in the week of 2 Dec to discuss the scope and gain an update on the commencement of the survey.

Kind regards

[REDACTED]



[REDACTED] | Environment Specialist
[REDACTED]

National Offshore Petroleum Safety and Environmental Management Authority

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Environment Plan:	Otway Basin 2DMC Marine Seismic Survey
Title(s):	Title applicant number: G6SMVV
Titleholder:	[REDACTED]
Nominated titleholder's representative:	[REDACTED]
Anticipated dates of onsite inspection:	Onshore: 16-17 December 2019
Regulated Business Premises	Level 5, 256 St Georges Terrace, Perth, 6000
Prepared by:	[REDACTED]
NOPSEMA Reference:	RMS ID 2101

1. Inspection Team

The petroleum environmental inspection team (the inspection team) comprises the following personnel:

Lead NOPSEMA inspector:	[REDACTED]
Other NOPSEMA inspector(s):	[REDACTED]

2. Petroleum Environmental Inspection Objectives

Inspections are conducted by NOPSEMA inspectors appointed by the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) to monitor titleholder's compliance with petroleum environmental law¹.

NOPSEMA directs its inspectors to conduct petroleum environmental inspections in accordance with Clause 3(3), Schedule 2A of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (OPGGGS Act). A direction has been given for this inspection to be conducted.

¹ *Petroleum environmental law* is defined at Schedule 2A of the OPGGS Act.



The inspection is envisaged to be conducted with the below scope. However, based on the information gathered during the inspection, the inspection team may deviate from the scope in the course of the inspection should it be deemed necessary to do so.

The inspection includes consideration of Schedule 2A of the OPGGS Act, the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (Environment Regulations) and good oil field practice.

The objectives of an inspection may include one or more of the following:

- advise on matters of environmental management to persons engaged in offshore petroleum operations²;
- ensure regulatory non-compliance is identified and appropriate enforcement undertaken consistent with NOPSEMA's Enforcement policies and procedures;
- support the continuation or amendment of any limitations and/or condition placed on the acceptance of the environment plan
- assess on balance whether or not a titleholder is continuing, since the acceptance of the environment plan (EP), to provide a satisfactory level of environment management; and
- assess on balance whether or not titleholders have implemented systems which drive continuous improvement of environmental risk management.

3. Justification for Inspection

NOPSEMA identifies and schedules inspections into an annual inspection program which is updated on a quarterly basis. Programming and scoping of inspections is undertaken using a risk based approach in conjunction with the consideration of other relevant factors outlined in the 'Petroleum Environmental Inspection Policy' (N-02200-PL0973). This approach ensures coverage and risk based prioritisation of inspections across the complete range of petroleum activities and titleholders regulated by NOPSEMA. This activity has been programmed for inspection in accordance with this risk based approach.

4. Scope

The OPGGS Act, the Environment Regulations and the in force EP for the activity form the basis for petroleum environmental inspections. The areas of focus for this inspection include:

Item 1: Environment Management - Acoustic disturbance - confirmation that the titleholder has processes in place to manage the activity in accordance with the 'limitation' issued in the decision notification.

Item 2: Ongoing Consultation with Relevant Persons - confirmation that there is an appropriate consultation process in place, focusing on interaction between the survey and southern blue fin tuna operations and industry association.

² *Provision of advice* is limited to regulatory interpretation, clarification of guidance, and provision of environment management guidance notes



Item 3: Biosecurity / IMS - confirmation that biosecurity risk assessment processes and control measures to achieve an acceptable level of biofouling risk have been implemented prior to the commencement of the activity

The inspection will include a follow-up on actions initiated as a result of previous recommendations relevant to the petroleum activity and/or the titleholder.

The scope of the inspection may also include other topics which may arise during the inspection.

5. Method

NOPSEMA inspectors conduct petroleum environmental inspections in accordance with the OPGGS Act, regulations and NOPSEMA policy and procedure. This inspection will be carried out in three stages; preparation, conduct, and closeout. Whilst the three stages are in order, the activities within each stage may be conducted in a different order to that listed below.

Stage 1 Preparation for inspection

This stage involves:

- Review of the relevant sections of the environment plan
- Review of any applicable reports submitted by the titleholder
- Review of any procedures, documents and records requested from, and provided by, the titleholder
- Review of recommendations and actions arising from:
 - previous inspections
 - incident reports
- Preparation of paperwork for the inspection.

Stage 2 Conduct inspection

This stage may incorporate a range of activities, including but not limited to:

- Facility induction and an opening meeting at the facility/premises
- Conducting discussions with management, titleholder representatives, and members of the workforce
- Inspection of the facility, plant and equipment
- Sighting equipment and taking photos on location
- Making copies or taking extracts from documents on location
- Reviewing documents on location, and/or
- Commencing drafting of the preliminary observations/findings from the inspection.

A proposed timetable for Stage 2 of the inspection is included in Appendix A, this will be further refined during the preparation stage.

Stage 3 Concluding the inspection



This includes conducting an exit meeting at the premises to discuss the observations and preliminary findings of the inspection.

This may also include a subsequent onshore meeting to discuss the findings from the inspection with onshore representatives.

Following conclusion of the inspection an inspection report will be issued. This report will set out the inspection team's conclusions with supported reasoning and any recommendations.

6. Requirements

- NOPSEMA requires the following to be provided to facilitate the inspection:
- A nominated representative for the visit having the authority to facilitate access to relevant personnel.
- A suitable work space/meeting room for the duration of the inspection.
- Reasonable access to relevant personnel responsible for environmental management of the activity. Appendix B includes a list of the type of personnel we may need to interview during this inspection.

7. Documents to be provided prior to the inspection

No document required prior to inspection

8. Feedback

Feedback on the conduct of the inspection may be provided directly to NOPSEMA inspectors, or may be submitted to NOPSEMA via the following inbox: inspections@nopsema.gov.au.

9. Privacy Notice

NOPSEMA collects your personal information if it is necessary to contact you for the purpose of performing functions or exercising powers under the *Offshore Petroleum and Greenhouse Gas Storage Act 2006*, the *Offshore Petroleum and Greenhouse Gas Storage (Regulatory Levies) Act 2009* and associated regulations. Failure to provide personal information may result in NOPSEMA being unable to properly administer these laws.

NOPSEMA will not use or disclose your personal information for any other purpose without your consent, unless:

- NOPSEMA uses or discloses it in relation to its enforcement activities
- certain permitted situations exist under the *Privacy Act 1988*
- use or disclosure is required or authorised by another Australian law.
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- individuals who make a request under the *Freedom of Information Act 1982*

- the Australian National Audit Office and other privately-appointed auditors
- other law enforcement bodies (for example, the police or the Coroner)
- to NOPSEMA's legal advisors.

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Proposed Timetable for Petroleum Environmental Inspection

Date	Time	Activity
Day 1 16 Dec 2019	0900	Entry meeting
	0930	Commence Item 1
	1230	Lunch
	1300	Continue Item 1 or commence Item 2
	1400	Continue or commence Item 2
	1700	End day 1
Day 2 17 Dec 2019	0900	Commence Item 3
	1130	Follow-up outstanding items from day 1
	1200	Lunch
	1230	Follow up Item 3
	1330	Inspector time to collate findings
	1500	Exit meeting – issue exit brief
	1530	Conclude inspection



Proposed List of Interviewees for the inspection

Not in any particular order :

Position
Titleholder representative
Environment Specialists
Marine Fauna Observers (remotely)
PAM operators (remotely)
Community liaison / consultation personnel
Biosecurity inspectors
Other contractors