

Our Ref: R007421: ID 0375: A211804
Contact: [REDACTED] (08) 6188 8751
Email: [REDACTED]@nopsema.gov.au

[REDACTED]
[REDACTED]
Maersk Drilling Australia Pty Ltd
Locked Bag 890
COMO WA 6952

Dear [REDACTED]

ENFORCEMENT – AUDITING – OPGGSA SCHEDULE 3, CLAUSE 9(2)(d)

I refer to the planned inspection of the Nan Hai VI conducted from 6 to 9 March 2012, where the inspection scope included auditing. The findings from the inspection indicate that auditing is not being conducted in accordance to the facility audit plan.

You are reminded that under clause (9)(2)(d) of Schedule 3 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006*, Maersk Drilling Australia Pty Ltd is required to take all reasonably practical steps to implement and maintain systems of work at the facility that are safe and without risk to health.

I request that you provide documented evidence by 16 July 2012, that the facility is being effectively audited in accordance to the Maersk 2012 facility audit plan (presented to NOPSEMA on 14 March 2012, detailed in Attachment 1 below) between the months of January to June 2012.

It should be noted that the following audit observations were made during the above inspection:

- The current accepted safety case (Rev 1a) identifies 'audits and auditing' on 68 separate pages, indicating auditing is embraced within the safety case. Audit and Audit Compliance is specifically addressed in Part 6, Section 6.2 of the safety case; and
- Audit related recommendations have been raised during previous NOPSAs inspections, including the following:
 - January 2008 – recommendations 235-10 (Audits – safety case and safety case revision SMS compliance) and 235-13 (Crane audits);
 - March 2009 – recommendations 330-8 (SCE verification scheme) and 330-14 (Corporate audits – 3PC); and
 - March 2010 – recommendation 413-13 (3PC audits).

Please note that this letter constitutes an enforcement action under NOPSEMA's Enforcement Management Model and therefore will be taken into consideration when determining any future enforcement action for similar contraventions.

If you have any questions regarding the above, please do not hesitate to contact OHS Inspector [REDACTED] on (08) 6188 8751 or alternatively contact me on (08) 6188 8720.

Yours faithfully

[REDACTED]

Lead OHS Inspector

16 March 2012

Attachment 1: MAE Audit Schedule Rev 0 - Received from MDA via email on 14 March 2012 - A211811.