

# REGULATOR

Issue 3 : 2013

## From the CEO

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"...whether there is still risk being unattended to out in the field is a matter for management of safety and that is entirely up to the operator and has been all along the line."

William Cullen, Baron Cullen of Whitekirk, 2013 In this issue of *the Regulator* we focus on tracking performance and improving processes, a theme that resonates as I return from the Piper 25 conference in Aberdeen, Scotland. This conference, held by Oil and Gas UK, marked the 25th anniversary of the Piper Alpha disaster where 167 men lost their lives. The theme was



"reflect, review, reinforce and re-energise" and served as an important reminder that we must reflect on the lessons learnt from major accident events, review how far offshore safety has progressed and reinforce our commitment to continuous improvement.

Strong safety performance is fundamental to confidence in an industry that has seen the tragic consequences of inadequate risk prevention. The deaths of two workers on the Stena Clyde facility in Australia in August of last year, and the deaths of two workers in the North Sea only last month, are a further stark reminder of the hazards of offshore petroleum activities.

In this issue of *the Regulator*, we will look at some of the changes that have taken place in the Australian offshore petroleum industry post-Piper. Undoubtedly, we have seen a fundamental shift in the approach to safety management, but we must ensure that this has led to a better understanding of risk management across the industry.

I am encouraged to see in the latest <u>Annual Offshore Performance Report</u> that the industry recorded a seven year low in the number of uncontrolled hydrocarbon releases during 2012 and a continuing reduction in injuries.

This issue will also look at how developing and implementing relevant procedures and systems can improve safety, structural integrity and environmental performance and how choosing meaningful and applicable process safety performance indicators can improve an offshore facility's safety case and reduce the risk of harm to offshore workers.

For NOPSEMA it is crucial that we are rigorous in our approach, we respect due process and implement transparent, coherent policies and processes. The authority continuously tracks its own performance to identify processes or procedures that may require improvement.

NOPSEMA will continue to work to ensure that our approach is shared with industry, our processes are consistent with the law, are administered by skilled professionals and focused on ensuring duty holders comply with their responsibilities to manage risks. These commitments reflect the legacy of Lord Cullen's recommendations, as well as the findings of inquiries into more recent major accidents such as Montara and Macondo. They underpin the principles of continuous improvement and recognise that the benefits of avoiding a major accident event far outweigh the costs of a system that places responsibility for managing risk with those who create the risk, overseen by an effective, independent regulator.

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Jane Cutler, CEO

# A renewed commitment to safety management

This month marks the 25th anniversary of the Piper Alpha disaster, the world's worst offshore oil disaster in which 167 lives were lost. 25 years on and we continue to see catastrophic failures in the offshore oil and gas industry - the Montara oil spill, the Macondo Deepwater Horizon disaster, the Elgin gas blowout. It is important to reflect on the lessons learnt from major accident events and to ensure that the lessons of the past are reflected in today's activities and tomorrow's plans.

Lord Cullen's Report of the Public Inquiry into the Piper Alpha Disaster made 106 recommendations that prompted widespread changes to the regulation of safety in the oil and gas industry. A key principle introduced and implemented shortly thereafter in Australia was the principle of a "goal setting" approach to the regulation of offshore petroleum activities.

A basic tenet of the goal setting, or outcomes-based, regime is the premise that the ongoing management of safety is the responsibility of the operator. In other words, those that create the risk are responsible for managing it. To demonstrate that all major accident risks have been adequately assessed and controlled the operator of an offshore facility must submit a safety case to the regulator.

While there has been significant progress in Australia in understanding the concept of 'risk' and its management, some industry encounters with NOPSEMA betray an approach to the contrary – with a focus on just getting a safety case accepted, 'getting it across the line', rather than considering the document as a component of a facility's safety systems underpinned by an unrelenting focus on reducing risk to the workforce and the environment.

NOPSEMA strongly supports the recommendations made by Lord Cullen, including the view that no amount of regulatory activity and inspection can make up for deficiencies in the way in which safety is actually managed by operators. At the recent Piper 25 conference, Lord Cullen emphasised that at every stage and at every level safety must be understood and accepted as the number one priority. Safety should be central to the way facilities are designed and operated with the content of a

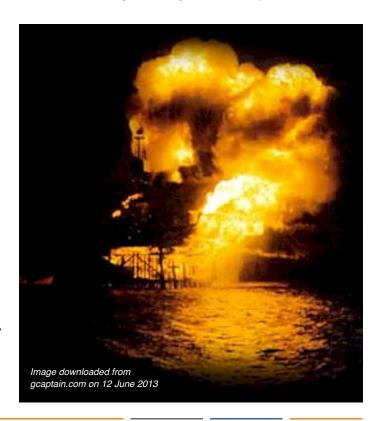
safety case widely understood. He also reiterated that top level commitment and effective safety leadership make a difference to securing positive process safety cultures which are important if major accident events (MAEs) are to be prevented.

A common question often received by NOPSEMA is about the right balance between managing immediate issues around safety and long term issues around environment. In NOPSEMA's view, this tension can be reduced by focusing on the prevention of MAEs because many of the actions and controls necessary to ensure the safety of people, such as blowout prevention, are equally effective at protecting the environment. This does not, of course, negate the need to take seriously those aspects of operational planning that exist primarily to protect the environment.

Challenges that face the Australian offshore petroleum industry, today and in the future, include:

- integrity of assets as infrastructure ages and life is extended
- employment of new technologies such as floating LNG production facilities
- aligning workforce competency with the pace of activity and
- meeting community expectations for responsible and sustainable practices.

NOPSEMA's regulatory emphasis will continue to be informed by these challenges. Communication and collaboration within industry, however, is essential. Only through industry's sharing of knowledge and experience will these challenges be negotiated safely.





# Report signals challenges and opportunities for improved safety performance

Inadequate design specification and procedures not being followed were identified as two prevalent causes of offshore petroleum incidents reported in 2012.

NOPSEMA recently launched its *Annual Offshore Performance Report* at the APPEA 2013 Conference and Exhibition in Brisbane. The report is the authority's yearly stocktake of risk management by the Australian offshore petroleum industry and includes data and information on injuries and fatalities, assessments, inspections and investigations collected by NOPSEMA from offshore petroleum activities up to 31 December 2012. For the first time, the report includes environmental management data reflecting NOPSEMA's expanded functions from January 2012.

NOPSEMA CEO Jane Cutler reinforced the constant need for vigilance in all stages of offshore petroleum operations, recalling the tragic deaths of two offshore workers on the Stena Clyde mobile offshore drilling unit in 2012.

"NOPSEMA shares the information in this report in the expectation that, with continued effort by all, the impact

of high risk activities on the lives of offshore workers and the environment will be negligible," Ms Cutler said.

Acknowledging that 2012 proved a costly year in terms of lives lost, Ms Cutler noted progress in some areas of the industry's safety performance, including a reduction in the rate of accidents to the lowest level recorded since 2005 and a seven-year low recorded in the rate of uncontrolled hydrocarbon releases.

"Lower injury rates should be commended as they represent actual harm avoided and demonstrate continuing endeavours by organisations to prevent further fatalities and harm to offshore workers," Ms Cutler said.

"I encourage industry leaders and the workforce to examine this report, in the context of their organisations' experiences, for insights into how offshore petroleum facilities can run more safely and responsibly," Ms Cutler said.

The <u>Annual Offshore Performance Report</u> can be accessed at <u>nopsema.gov.au</u> NOPSEMA encourages feedback on the publication via a short survey accessible on the same web page.

# NOPSEMA seeks input from industry to revise levies

At the 2012 Review of Cost Recovery Arrangements meeting NOPSEMA advised representatives of the offshore petroleum industry that the current rates of levies were below the level required to meet the costs of delivering the authority's legislated functions.

NOPSEMA has commenced an in depth analysis of its resource requirements to deliver regulatory oversight as specified under section 646 of the *Offshore Petroleum* and *Greenhouse Gas Storage Act 2006* (OPGGS Act). The key elements that are currently being examined include:

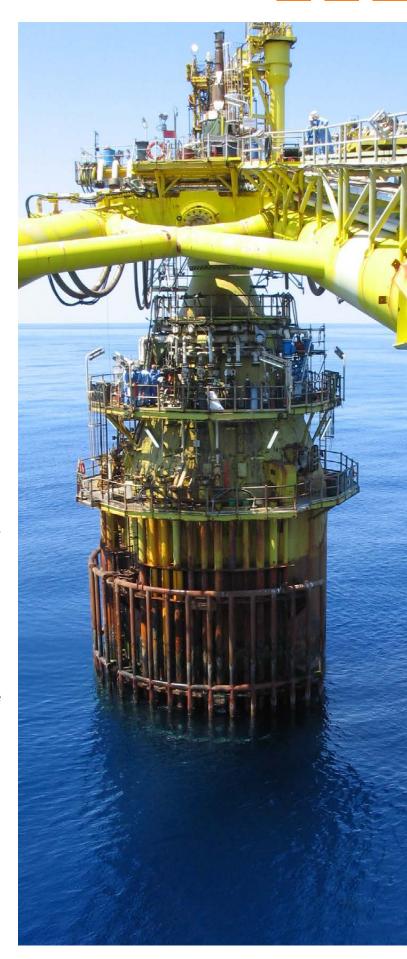
- harmonising the approach between the three types of levies
- increasing requests by industry for regulatory guidance and engagement
- ongoing legislative and performance reviews
- regulatory research to keep abreast of new technology and
- experience to date in the administration of NOPSEMA's relatively new functions of well integrity and environmental management.

Existing levy payers, industry representatives, relevant government agencies, and other stakeholders were invited to provide written submissions addressing the <u>Terms of Reference</u> for the review by 30 June, as well as firm estimates of activity levels in 2013-14 and 2014-15 that are subject to levies. The information collected will assist NOPSEMA in refining estimates of offshore petroleum activity levels and, as a result, determine more appropriate levy mechanisms and rates that are required to recover the costs of delivering NOPSEMA's legislated functions.

In the coming month, a draft report and *Cost Recovery Impact Statement* (CRIS) will be forwarded to industry stakeholders for further comment and presented at a workshop where NOPSEMA will address any identified concerns and, where necessary, provide guidance.

It is NOPSEMA's intention to finalise the report and CRIS with any new levy rates to come into effect from 1 January 2014.

For more information visit the 'Cost recovery and levies' page located under the 'About' tab at nopsema.gov.au



# NOPSEMA launches new secure file transfer system

To eliminate the reliability risks associated with emailed documents, NOPSEMA has introduced SecureFile, a web-based service for operators and titleholders that provides a reliable and secure method for delivering regulatory submissions.

In 2012, NOPSEMA received 134 safety cases for assessment, 33 well operations management plans and 104 environment plans. The electronic documents supplied as part of those submissions are often sent to NOPSEMA via email and, while email is convenient there can be delivery problems, particularly related to the size of submissions.

SecureFile is now NOPSEMA's preferred method for delivery of all electronic document submissions. Extensive measures have been taken to ensure the security of documents in transit, and the system itself - the service is protected by multiple layers of access control.

SecureFile has been designed to be simple to use and to be available from any web browser. More information and instructions on how to use the system can be found on the <u>Secure File Transfer</u> page located under the 'Contact' tab at nopsema.gov.au

If you require any assistance in using SecureFile, please contact the Information Team via email at information@nopsema.gov.au

While SecureFile provides improved reliability for delivery of electronic documents, please note that a printed copy of all submissions is also still required to be delivered to NOPSEMA in accordance with section 771 of the OPGGS Act.





# Designing procedures and instructions to reduce human error

The quality of procedures and instructions can impact the likelihood that a person will make an error while performing a task.

Workforce compliance with procedures and instructions is influenced by the quality and relevance of content, its readability, the accessibility of the information and the perceived effectiveness of the prescribed process. It is essential that procedures and instructions that are critical to safety, integrity, and environmental management are designed to reduce the likelihood of human error.

In almost 30% of all accident and dangerous occurrence notifications reported to NOPSEMA procedural failures have been identified as a contributing factor. Good quality procedures and instructions combined with high levels of workforce compliance can improve safety, structural integrity and environmental performance. Procedures and instructions are commonly used as a control against hazardous events, and can contribute to the reduction of risks to a level that is as low as reasonably practicable (ALARP).

To assist in the design and implementation of error-reducing procedures and instructions NOPSEMA has developed the *Human Factors: Procedures and Instructions* information paper. The paper is the third in a series focusing on human factors and is designed to provide information and advice about the ways in which human factors tools and techniques can be applied to contribute to the reduction of risks to ALARP.

For information about human factors go to the '<u>Human factors</u>' page located under the 'Resources' tab at <u>nopsema.gov.au</u>

## Myths and misconceptions

### **Delays in assessment**

MYTH: NOPSEMA has been slow to assess environment plans

The Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 require NOPSEMA to, within 30 days, either accept the environment plan (EP), refuse to accept the EP or give notice to the operator stating that NOPSEMA is unable to make a decision. If NOPSEMA is not reasonably satisfied that the EP meets the criteria for acceptance, NOPSEMA must give the operator a 'reasonable opportunity' to modify and resubmit the EP.

The NOPSEMA <u>Environment Plan Assessment</u> Policy provides for two opportunities to modify and resubmit an EP. On first submission, EP assessments have been conducted within approximately 26 days on average, and within statutory timeframes. The assessment of subsequent resubmissions is often undertaken in a shorter timeframe than the first submission. Often EPs are submitted very close to start of the proposed activity thereby creating challenges for provision of sufficient time to modify and resubmit an EP. The average time taken in total from first submission to a final decision to accept or refuse an EP varies for different activity types. To assist operators with planning, these average assessment timeframes are routinely updated and published on the 'Environment Plans' page located under the 'Environmental Management' tab at nopsema.gov.au



the Regulator

### **Diving activities**

MISCONCEPTION:

AS/NZS 2299.1:2007 'Occupational Diving Operations' is an appropriate standard to apply to the conduct of offshore petroleum and greenhouse gas storage related diving operations

This standard specifically states that it does not apply to diving operations covered by the Commonwealth Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2009, notwithstanding Safety Regulation 4.26 which allows application of AS/NZS 2299.1 specifically in regards to dive medical certificates.

#### Acceptance of an environment plan

MISCONCEPTION:

An environment plan needs to include hundreds of pages of complex evaluation to be accepted

An EP does not need to be long and complex. EPs can meet all the requirements of the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 while being concise and 'user-friendly'. The necessary information can be collated such that it is presented in a logical order and appropriately cross-referenced throughout the document to avoid unnecessary repetition. Superfluous or repetitive information commonly leads to contradictions and confusion which may unnecessarily extend the assessment process.

During the assessment process, NOPSEMA commonly requests further demonstration and improved evaluations. This is sometimes misunderstood to mean 'more information' when what may actually be required could be less peripheral information and a more clearly constructed demonstration against the requirements of the Environment Regulations. For more information see the NOPSEMA Guidance Note for *Environment plan content requirements* or visit the 'Environment Plans' page located under the 'Environmental Management' tab at nopsema.gov.au

#### **Environment levies**

QUESTION: Why do I have to pay two years' worth of compliance levies for my activity that only lasts for seven months?

The Offshore Petroleum and Greenhouse Gas Storage (Regulatory Levies) Regulations 2004 require that the first instalment of a compliance levy is due 30 days after the submission of the EP (or proposed revision) and each subsequent instalment is due at the beginning of each calendar year after the submission of the EP (or proposed revision). For example, if an EP is submitted in October the first instalment of the compliance levy will be due in November and the second in January. If your activity spans two calendar years it is subject to two annual compliance levy amounts. For more information see the NOPSEMA <u>Environment Plan Levy</u> Guideline or visit the 'Environment Plans' page located under the 'Environmental Management' tab at nopsema.gov.au





## Offshore regulatory reform

In May, new legislation was passed by the Australian Parliament that marks continued progress in implementing the recommendations made in the Final Government Response to the Report of the Montara Commission of Inquiry.

The passing of the <u>Offshore Petroleum and Greenhouse</u> <u>Gas Storage Amendment (Compliance Measures No. 2)</u> <u>Act 2013</u> aims to strengthen the operating practices of the offshore petroleum industry and provide additional enforcement powers to NOPSEMA to secure compliance.

Strengthened enforcement powers given to NOPSEMA include:

- The ability to implement a range of alternative enforcement mechanisms such as infringement notices, adverse publicity orders, injunctions and continuing penalties.
- The ability for NOPSEMA inspectors to issue environmental prohibition and improvement notices to ensure titleholders take action to remove significant threats to the environment where required.

Amendments were also made to strengthen incident preparedness and response arrangements, including:

 Implementing an express polluter-pays obligation, which in the event of an escape of petroleum, requires the titleholder to eliminate or control the escape, clean-up the escaped petroleum, remediate any environmental damage and carry out environmental

- monitoring of the impact of the escape. These amendments also include cost recovery mechanisms.
- Clarifying insurance requirements to make the maintenance of sufficient financial assurance compulsory.

A number of minor amendments were also passed, which will further improve OHS and environmental outcomes, these include:

- Requiring NOPSEMA to publish on its website improvement and prohibition notices issued by NOPSEMA inspectors, enabling lessons learned to be shared with other members of the offshore petroleum industry.
- Moving the document service provisions in the OPGGS
   Act into the regulations. It is proposed that these
   provisions will be amended to enable documents
   required or permitted under the OPGGS Act to be
   given to NOPSEMA, a corporation or a person by
   electronic means.
- Implementing into the regulations the existing multiple titleholder arrangements in the OPGGS Act, which require the nomination of one titleholder to take all voluntary actions on behalf of the titleholder group.

Most of the amendments will not commence until the Regulatory Powers (Standard Provisions) Bill 2012 commences, at which time the majority of the amendments contained in the Offshore Petroleum and Greenhouse Gas Storage Amendment (Compliance Measures) Act 2013 will also commence.

For more information go to 'Recent changes in legislation' under 'Legislation and regulations' at nopsema.gov.au

# Process safety – Selecting key performance indicators

"Industry leaders should heed the lessons of the past, gained at great human and financial cost, and implement effective process safety in their organisations." – The Hon Gary Gray MP AO, Minister for Resources and Energy, APPEA National Conference 2013.

Experience shows that data about personal injuries suffered by individual members of the workforce (i.e. personal safety) does not properly inform us about the adequacy of the management of risks at a facility or operation. For example, a low injury rate was recorded at the BP Texas City Refinery prior to the explosions in 2005 which claimed 15 workers' lives and injured a further 180 people. At the time, personal injury safety data at the refinery did not correlate well with the poor management of technical controls to manage the hazards at the refinery (i.e. process safety) which was subsequently identified as contributing to the cause of the accident.

NOPSEMA's Guidance Note on <u>Safety Management</u> <u>Systems</u> refers to Regulation 2.6 of the Offshore Petroleum and Greenhouse Gas (Safety) Regulations 2009 which addresses the requirement for a safety case for an offshore facility to demonstrate effective means of ensuring continual improvement and systematic identification of deficiencies in the facility's safety management system.

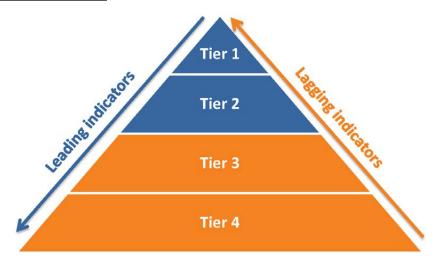
In Part 3 of *the Regulator* series about process safety we look at ways of complying with Safety Regulation 2.6, including the regular review of selected key performance indicators (KPIs) to sustain efforts to strengthen barriers critical to the prevention of major accident events (MAEs). For more information about continuous improvement visit the 'Safety Case' page located under the 'Safety' tab at nopsema.gov.au

Encouraging findings from NOPSEMA research into Industry safety improvement initiatives showed that 100% of respondents reported the use of KPIs to measure safety performance and 82% reported that they provided training in process safety.

The International Oil and Gas Producers Association (OGP) identifies a four tier approach to selecting suitable KPIs for the barriers that are most critical for managing the risks of major accident events in the <u>Process Safety-Recommended Practice on Key Performance Indicators Report No. 456</u>, published in November 2011. The report builds a framework based on the American Petroleum Institute's (API) <u>Recommended Practice 754</u> and guidelines published by the UK Health and Safety Executive (HSE), the Center for Chemical Process Safety (CCPS), and the Organisation for Economic Co-operation and Development (OECD).

In the report, the OGP encourages facility operators to focus on leading indicators (tiers 3 and 4) which monitor the strength of a barrier by measuring the organisation's performance in maintaining robust risk controls. By selecting KPIs that are applicable to the barrier, organisations will gather meaningful information to optimise the effectiveness of the barrier and also address any identified weaknesses.

Organisations must not focus exclusively on personal safety at the expense of implementing effective process safety measures or they will fail to meet their obligations to safeguard the workforce from the greater consequences of catastrophic major process failures (i.e. multiple fatalities, deaths and injuries).





### As at 25 June 2013

Disclaimer: Data presented here may vary as further information becomes available.

#### **Assessments**

ASSESSMENTS SUBMITTED			2013	
Assessment type	Subtype	April	May	June
ATBA access application	Not applicable	1	2	0
	New	0	0	0
Diving safety management system	Revision	0	0	0
Diving start up notice	Not applicable	0	6	1
F	New	5	2	7
Environment plan	Revision	4	4	3
PSZ access application	Not applicable	0	1	0
"	New	0	1	0
PSZ application	Renewal	0	1	0
	New	1	6	0
Safety case	Revision	6	6	4
Scope of validation	Not applicable	7	3	0
Well activity application	Not applicable	5	2	5
	New	1	1	3
Well operations management plan	Variation	0	0	0
	TOTAL	30	35	23

ASSESSMENTS NOTIFIED	O AND	Accepted	/agreed/ a	dvised		efused/not recalled/ret		% Notified within time regulations					
COMPLETED		2013											
Assessment type	Subtype	April	May	June	April	May	June	April	May	June			
ATBA access application	Not applicable	0	3	0	0	0	0	N/A	100	N/A			
Diving safety	New	0	0	0	0	0	0	N/A	N/A	N/A			
management system	Revision	0	0	0	0	0	0	N/A	N/A	N/A			
Diving start-up notice	Not applicable	0	1	1	0	4	0	N/A	100	100			
en toron out also	New	5	1	1	0	0	0	100	100	100			
Environment plan	Revision	0	1	1	0	0	0	100	100	100			
PSZ access application	New	0	1	0	0	0	0	N/A	100	N/A			
DOT 11 11	New	0	1	0	0	0	0	N/A	100	N/A			
PSZ application	Renewal	0	1	0	0	0	0	N/A	100	N/A			
Cafata	New	2	0	1	1	0	1	100	100	100			
Safety case	Revision	2	3	2	0	1	0	100	100	100			
Scope of validation	Not applicable	5	7	2	0	1	0	100	87.5	100			
Well activity application	Not applicable	1	4	3	0	0	0	100	100	100			
Well operations	New	1	1	0	0	0	0	100	100	N/A			
management plan	Variation	1	0	0	0	0	0	100	N/A	N/A			
	TOTAL	17	24	11	1	6	1						

 ${\it Note: In some instances \ a single \ assessment \ may \ relate \ to \ multiple \ facilities}$ 

Assessments still in progress are not included

### **Inspections**

TVDF			20	12		2013						
ТҮРЕ	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
Facilities/activities inspected	5	51	5	10	18	6	8	15	15	16	17	20

### **Complaints**

TVDE			20	12		2013						
TYPE	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
OHS complaints	0	0	0	0	0	0	0	2	1	0	0	0
EM complaints	0	0	0	0	0	0	0	0	1	0	0	0

Note: A number of complaints were re-categorised as 'information only'.

### **Injuries**

ТҮРЕ			20	12		2013						
TYPE	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
Lost time injuries (LTI >1 day) <sup>a</sup>	2	6	2	1	1	1	1	1	3	1	1	Data
Alternative duties injuries (ADI)	2	1	3	1	7	4	4	1	2	7	4	not avail-
Medical treatment injuries (MTI)	2	0	4	4	6	2	1	3	0	4	2	able
Total recordable cases (TRC)	6	7	9	6	14	7	6	5	5	12	7	

a. LTI incl. lost time injuries less than 3 days

Note: As reported under OPGGS(S) Regulation 2.42. (injury summaries submitted not less than 15 days after the end of each month)

Some operator reports were outstanding at the time of this publication

### **Incident notifications**

INCIDENT TYPE			2013	
		Apr	May	Jun
Accidents	Death or serious injury	0	1	Data not
and dangerous	Incapacitation > 3 days LTI	1	2	available
occurrences	Accidents total	1	2	
	Could have caused death or serious injury	2	2	5
	Could have caused incapacitation > 3 days LTI	0	1	0
	Fire or explosion	1	0	0
	Collision marine vessel and facility	1	0	0
	Uncontrolled HC release >1 300 kg	0	3	2
	Uncontrolled HC release >300 kg	0	0	0
	Uncontrolled PL release >80 12 500 L	0	0	0
	Uncontrolled PL release >12 500 L	0	0	0
	Unplanned event implement emergency response plan	13	7	4
	Damage to safety-critical equipment	11	5	5
	Other kind needing immediate investigation	5	6	2
	Well kick >50 barrels	1	0	0
	Pipeline – substantial risk of accident	0	0	0
	Pipeline – kind needing immediate investigation	0	0	0
	Pipeline – significant damage	0	0	0
	Dangerous occurrences total	34	24	18
	Accidents and dangerous occurrences total	35	26	18
Reportable	Hydrocarbon/petroleum fluid release	0	1	2
environmental	Chemical release	3	2	1
incidents	Drilling fluid/mud release	0	0	1
	Fauna incident	1	1	2
	Other			
	Reportable EM incidents total	4	4	6
Recordable	Non HC air emissions	1	0	
environmental	Breach of procedural control	1	0	_
incidents	Chemical spill	1	0	_
	Hydrocarbon gas release/air emissions	0	0	_
	Hydrocarbon spill (<80 L)	3	2	-
	Non-conformance with planned discharge	1	0	
	Solid waste discharge/dropped object	0	0	Data no
	Other unplanned liquid discharge	0	0	available
	Spill - no discharge to marine environment	0	0	-
	Injury or death - fauna	0	1	
	Seabed/benthic damage	0	0	-
	Equipment not functioning	0	0	_
	Other	0	0	_
	Recordable EM incidents total	7	3	
	EM incidents total	11	7	6
Not reportable	OHS not notifiable			
incidents	EM not notifiable	0	0	0
-	Recordable environmental incident	0	1	2
	necordable environmental incluent	U		
	Not reportables total	0	1	2

Note: As notified under OPGGS(S) Regulation 2.41 and OPGGS(E) Regulation 26.

### **Enforcements**

			20	12			2013					
ENFORCEMENT ACTION TYPES <sup>a</sup>	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
Improvement notice	0	1	5	23	0	3	0	1	0	2	9	1
Intent to remove operator from register	0	0	0	0	0	0	0	0	0	0	0	0
Intent to withdraw EP acceptance	0	0	0	0	0	0	0	0	0	0	0	0
Intent to withdraw SC acceptance	0	0	0	0	0	0	0	0	0	0	0	0
Intent to withdraw WOMP acceptance	0	0	0	0	0	0	1	0	0	0	0	0
Notice requiring variation of a well operations management plan	0	0	0	0	0	0	0	0	0	0	0	0
Prohibition notice	0	0	0	0	0	0	0	2	1	0	0	0
Prosecution brief	0	0	0	0	0	0	0	0	0	0	0	0
Removal of operator from register	0	0	0	0	0	0	0	0	0	0	0	0
Request for revised SC	1	0	0	0	0	0	0	0	1	0	1	0
Request for revised EP	1	0	0	0	0	1	0	16	4	6	5	0
Verbal Advice/warning	0	0	0	0	0	0	0	0	0	0	0	0
Withdrawal of EP acceptance	0	0	0	0	0	0	0	0	0	0	0	0
Withdrawal of SC acceptance	0	0	0	0	0	0	0	0	0	0	0	0
Withdrawal of WOMP acceptance	0	0	0	0	0	0	0	0	0	0	0	0
Written advice/warning	1	1	0	2	2	0	1	0	1	2	2	4
TOTAL	3	1	5	25	2	4	2	19	7	10	17	5

a. Does not include directions, verbal advice/warnings or investigation-related notices (do not disturb notice or removal of plant or sample)

Note: 'Request for revised EP' data includes one request in Oct-Dec 2012 and 20 requests in Jan-March 2013 for revision to an environment plan transitioned from the former designated authorities

GLOSSARY OF ACRONYMS											
ATBA	Area to be avoided	НС	Hydrocarbon	PSZ	Petroleum safety zone						
EM	Environmental management	OHS	Occupational health and safety	sc	Safety case						
EP	Environment plan	PL	Petroleum liquid								



### Schedule of events

• 5 August 2013 APPEA HSR and safety workforce forum,

Perth

• 6-7 August 2013 APPEA national oil and gas safety

conference, Perth

• 21-23 October 2013 5th International regulators' offshore

safety conference, Perth

• 24-25 October 2013 20th Annual International Regulators

Forum (IRF) meeting, Perth













### **Feedback**

NOPSEMA welcomes your comments and suggestions. Please direct media enquiries, requests for publications, and enquiries about NOPSEMA events to <a href="mailto:communications@nopsema.gov.au">communications@nopsema.gov.au</a> Operators and other employers are encouraged to circulate this newsletter to their workforce.

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