

OHS Improvement Notice

Offshore Petroleum and Greenhouse Gas Storage Act 2006, Schedule 3 clauses 78, 78A and 78B

Notice No: 1907

Date: 19/04/2023

To: Expro Group Australia Ltd

In conducting an OHS inspection in relation to the Pride facility, I [REDACTED], a NOPSEMA inspector appointed under section 602 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (the Act), am satisfied on reasonable grounds that

Expro Group Australia Ltd (Expro) has contravened a provision of a listed OHS law and is likely to contravene that provision again

AND

As a result, there is, or may be, a risk to the health or safety of a person at the Pride facility.

I am satisfied that Expro has contravened a provision of a listed OHS law and is likely to contravene that provision again is Cl. 10(1) of Schedule 3 to the OPGGS Act.

The reasons for my opinion are:

- Expro have failed to take all reasonably practicable steps to implement and maintain systems of work for carrying out well intervention work at the Pride facility that are safe and without risk to health because they do not have a planned maintenance system for well intervention equipment that is comprehensive and integrated. Specific deficiencies identified during inspection #3572 include:
 - Expro personnel on the Pride facility were not able to demonstrate that the high pressure flushing pump unit has been captured in the planned maintenance system because they are not provided access to the computerised system used for management of well intervention equipment maintenance.
 - Expro was not able to provide evidence of some other documented maintenance system for the high pressure flushing pump, such as a plan or procedure from the flushing pump manufacturer or supplier.
- Expro also failed to take all reasonably practicable steps to ensure that any plant and equipment, materials used for carrying out well intervention work at the Pride facility are safe and without risk to health because they were not able to demonstrate that the high pressure flushing pump has been appropriately maintained in accordance with any documented system. Specific deficiencies identified during inspection #3572 include:
 - Expro was only able to provide records of daily checks on the high pressure flushing pump unit for the preceding 12 month period during which the unit had been installed on the Pride.
 - The daily check list for the high pressure flushing pump unit includes checking for leaks. However, inspectors found that there was liquid pooled on top of a relief valve fitted to the unit which was not reflected in the completed daily checks.

- Expro is likely to contravene the requirements of the listed OHS law again because Expro has previously been issued improvement notice #694 for failing to undertake an adequate maintenance assurance process in relation to well fluid handling equipment. Further, the Expro well intervention equipment will remain on the Pride facility for the foreseeable future. During the course of the inspection, it was apparent that Expro was aware of some issues, like the lack of access to the computerised maintenance system and took no action. In other cases, Expro was not aware of the issues, such as the omission of the high pressure flushing pump from the planned maintenance system.

As a result of this contravention, I am satisfied that there is, or may be, the risk to the health or safety of any person from fire or explosion resulting in death or serious injury following a potential loss of hydrocarbon containment from fluid handling equipment during well intervention work on the Pride facility

I am satisfied on reasonable grounds that the following action(s) must be taken by the responsible person to reduce or prevent the risk:

1. Implement a planned maintenance system for well intervention equipment that:
 - a. is comprehensive and integrated and includes the maintenance programs for all well intervention equipment that takes into account possible failure modes, actual operating conditions, and the recommendations of equipment suppliers or manufacturers, and
 - b. that the facility workforce can readily access.
2. Ensure the maintenance of the high pressure flushing pump unit has been carried out in accordance with supplier or manufacturer instructions and reflects the actual operating conditions on the Pride facility.

You are required to take action to reduce or prevent the risk within 30 days from the date of this notice.


NOPSEMA INSPECTOR


19 April 2023

When the required action(s) has been completed, the Responsible Person is to submit this part of the notice to the following person via:

Post: Level 8, 58 Mounts Bay Road
Perth WA 6000

Email: submissions@nopsema.gov.au

Name: [REDACTED]
Position: **NOPSEMA INSPECTOR**
Contact number: [REDACTED]

By signing below, I confirm on behalf of Expro Group Australia Ltd that the specified action described in Improvement Notice No. 1907 has been undertaken within the period specified.

Signed: _____ Date: _____

(to be signed by responsible person only when the notice has been complied with)

Notes

1. Under clause 78A of Schedule 3 to the Act, a responsible person who fails to ensure that this notice is complied with, to the extent that it relates to any matter over which the responsible person has control:
 - a. commits an offence and may be liable to a penalty of 300 penalty units for the offence; or
 - b. contravenes a civil penalty provision and may be liable to a civil penalty of 400 penalty units.
2. For every day proceeding the initial offence or contravention the notice is not complied with, the responsible person commits an offence or contravention in respect of each day (including a day of a conviction under this clause or any later day) during which the offence or contravention continues.
3. A copy of this notice must be displayed in a prominent place at or near each workplace where work affected by the notice is being performed. It is an offence to tamper with or remove it until the notice has ceased to have effect.
4. The recipient of this notice must ensure that all relevant requirements for giving copies of the notice to certain persons and representatives are complied with in accordance with cl 78b to Schedule 3 to the Act.
5. Under clause 80A of Schedule 3 to the Act, any of the following persons may request the reviewing authority in writing to review the NOPSEMA inspector's decision:
 - the operator of the facility;
 - the titleholder, if the notice is issued to a titleholder;
 - any person to whom an improvement notice has been issued;
 - an employer, if affected by the decision;
 - a relevant health and safety representative; a relevant workforce representative, if requested by a member of the workforce affected by the decision;
 - a person who owns any workplace plant, substance or thing to which the NOPSEMA inspector's decision relates.