

## OHS Improvement Notice

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

**Notice No:** 1923

**Date:** 28/11/2023

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To: Expro Group Australia Pty 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 Pty 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 the provision Expro has contravened and is likely to contravene again is cl. 10(2)(b) of Schedule 3 to the OPGGS Act.

The reasons for my opinion are:

- Expro is the main contractor responsible for, and in control of, well intervention operations on the Pride facility. Expro failed to take all reasonably practicable steps to ensure that the crane used for well intervention operations was safe and without risk to health by failing to ensure that the operator of the facility V.Ships Offshore (Asia) Pte Ltd [V.Ships], lubricated, inspected, and maintained the crane wire used for well intervention operations. As a result, the crane wire did not have an appropriate margin of safety to conduct well intervention operations. Specific failures by Expro identified during inspection 12655 include:
  - a. failing to ensure a thorough inspection of the crane wire rope was carried out in accordance with the ISO 4309:2010 (identified in the Pride facility planned maintenance system (PMS) work instruction for crane wire inspections) after the crane sheave incident of 13 October 2022, particularly in relation to the section of wire most likely to have been damaged during the incident.
  - b. failing to ensure that during the deployment of the beacon to 1300m on 23 January 2023, a thorough inspection of the crane wire was conducted, including inspection of the working length of the wire plus 5 wraps.
  - c. Failing to ensure the greasing of the crane wire was conducted in accordance with the work order in the maintenance system. The inspection found that as of 13 February 2023, Expro was in possession of information showing that the lubrication being used was not what was specified by the Original Equipment Manufacturer (OEM) and the main wire greasing frequency of 6 months recorded in the Pride facility PMS was not being carried out.
  - d. approving the task plan, procedure, and instructions used to direct the operator of the crane to deploy and hold at depth the Subsea Service Module (SSM) at the time of the incident on 19 September 2023 when the main crane wire failed.


- e. failing to ensure V.Ships was carrying out annual, thorough, non-destructive examination by means such as magnetic rope testing as specified in the Pride facility PMS.
- I am satisfied that Expro is likely to contravene cl. 10(2)(b) of Schedule 3 of the OPGGS Act again because:
  - a. during inspection 12655 it became evident that Expro were aware of some of the issues identified but had taken no steps to rectify them. The issues Expro were aware of included:
    - The need to carry out a thorough examination of the wire rope following the sheave failure incident of October 2022 by means such as measuring the wire rope diameter or to carry out magnetic rope testing instead of relying on visual inspection only.
    - The crane wire greasing was not being done at the frequency specified in the Pride maintenance system or with the type of grease specified by the crane manufacturer.
    - FTAI and V.Ships did not have a system or method for measuring fatigue or wear in the wire rope, particularly for operations such as deploying the SSM to depth and holding it suspended with the crane in active heave compensation mode for extended periods of time.
  - b. Expro was the subject of improvement notices #694 and #1907 for failing to undertake adequate maintenance assurance processes, on those occasions in relation to well fluid handling equipment.

As a result of this contravention, I am satisfied that there is, or may be, a risk to the health or safety of any person from dropped objects resulting in death or serious injury following a failure equipment including cranes, crane wire, or associated lifting equipment during well intervention operations at the Pride facility.

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

1. Complete analysis or modelling for fatigue of the Pride facility crane wire identified in Expro procedures to be used for the deployment of the SSM requiring the module to be suspended from the crane wire for extended periods of time. Demonstrate to NOPSEMA that the analysis for fatigue identifies the limits of safe operation for leaving the SSM suspended during well intervention operations.
2. Complete a review of Expro marine and contractor maintenance assurance processes in relation to the selection and engagement of Pride vessel for well intervention operations.
3. Demonstrate to NOPSEMA the gaps and deficiencies identified from the review of Expro marine and contractor maintenance assurance processes and how corrective actions will be implemented.
4. Demonstrate to NOPSEMA that maintenance of Pride facility cranes has been carried out in accordance with OEM instructions and reflects the actual operating conditions on the Pride facility.
5. Demonstrate to NOPSEMA the outcome of the Expro process for ensuring the Pride facility main crane has been maintained in accordance with OEM instructions and is appropriate for the well intervention operations.

You are required to take the above actions within 90 days from the date of this notice.

  
**NOPSEMA INSPECTOR**  
wA771594

07 December 2023

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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](mailto:submissions@nopsema.gov.au)

Name: [REDACTED]  
Position: **NOPSEMA INSPECTOR**  
Contact number: +61 8 6188 8700

By signing below, I confirm on behalf of Expro Group Australia Pty Ltd that the specified action described in Improvement Notice No. 1923 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:
  - c. the operator of the facility;
  - d. the titleholder, if the notice is issued to a titleholder;
  - e. any person to whom an improvement notice has been issued;
  - f. an employer, if affected by the decision;
  - g. a relevant health and safety representative; a relevant workforce representative, if requested by a member of the workforce affected by the decision;
  - h. a person who owns any workplace plant, substance or thing to which the NOPSEMA inspector's decision relates.