

OHS Improvement Notice

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

Notice No: 1928

Date: 28/11/2023

To: Noble Drilling Australia Pty Ltd

In conducting an OHS inspection in relation to the Noble Deliverer 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

Noble Drilling Australia Pty Ltd (Noble) is contravening a provision of a listed OHS law

AND

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

The listed OHS law that I am satisfied is being contravened is contravening a provision of a listed OHS law cl. 9(2)(c) of Schedule 3 to the OPGGS Act.

The reasons for my opinion are:

Noble have failed to take all reasonably practicable steps to ensure that the riser tensioner high pressure hydraulic hoses which are safety critical equipment that ensures primary well control at the facility, are maintained to ensure they are safe and without risk to health. Specific failures include:

- Noble failed to implement an appropriate maintenance system for periodic inspection and pressure testing of the hoses.
- Noble cannot currently provide evidence that the riser tensioner hoses meet the requirement of API RP 17B.
- Noble's Hose Management Procedure fails to identify the hoses at all, this includes safety criticality.
- Noble provided original hose certificates with manufacture date 2012 and commented that they were installed in 2015, Noble failed to change out the hoses at the 5-year intervals as describe in the original manufacturer Maintenance manual.
- Noble have received fluid reports showing increased foreign particle contamination in the tensioner system which indicates internal hose liner breakdown and cannot provide evidence of internal hose inspections.

As a result of this contravention, I am satisfied that there is, or may be, the following 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 the facility riser system in the event of tensioner hose failures on the Noble Deliverer 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. Immediately engage a recognized third party to conduct a full internal and external inspection including pressure test. The full inspection must be conducted within 30 days from the date of this notice and include a statement of fitness according to API RP 17B.
2. Replace all riser tensioner hoses within 6 months of the date of this notice as described in the original manufacturer maintenance manual for 5 -year interval change outs.

[REDACTED]
NOPSEMA INSPECTOR
[REDACTED]

28 November 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 10, 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 Noble Drilling Australia Pty Ltd (Noble) that the specified action described in Improvement Notice No. **1928** 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 displayed in a prominent place at or near each workplace which 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.