

STRICTLY CONFIDENTIAL

Report Title: Nganhurra RTM Status

Report Date: 17 MAR 2023

Issued pursuant to General Direction No. 1897, Schedule 1 Direction 4

Direction 1 – *The registered holders must take all reasonable measures to continue to monitor the status of the riser turret mooring (RTM) and mitigate the risk from the RTM presenting a collision risk to other marine users or presenting an environmental risk, and to continue to take such measures until such time that the RTM has been decommissioned.*

Direction 2 – *The registered holders must notify NOPSEMA as soon as reasonably practicable of any change in the status of the RTM, and the actions it is intending to take to assess and control the associated risks.*

Direction 3 – *As soon as reasonably practicable following any change in the status of the RTM referred to in Direction 2, the titleholder must conduct an assessment of the condition of the RTM and provide to NOPSEMA a report on the outcomes of the assessment and the control measures that will be implemented. The control measures proposed must be to NOPSEMA’s satisfaction.*

Direction 4 – *The registered holders provide a fortnightly report (or other period as agreed with NOPSEMA) from the 6 January 2023 to cover the status of the RTM, a current risk assessment, the control measures in place or planned, and the forward plan through to decommissioning of the RTM.*

1. RTM Status

Item	Comments
Remote Draft Monitoring System	System online. As of 17 th March the observed draft is 75.8m. Weather conditions over the past 3 days have been moderate with a storm passing over the facility yesterday morning. Significant wave heights, Hs, have ranged between 1.5 to 2.8m.
Navigation lights	Operating – confirmed by DPS1 Drilling Logistics Coordinator on 17th March 2023.
Field observations	Weekly visual from DPS1 confirmed RTM remains afloat with a draft representative of the readings from the Draft Monitoring System.
Other	

STRICTLY CONFIDENTIAL

2. Current Risk Assessment and Control Measures for 'Loss of RTM Prior to Removal' (In Place and Planned)

Below is a summary of impacts, causes and controls (in place and planned) for the 'Loss of RTM Prior to Removal'

Impacts	Cause (s)	In place Control	Planned Control / Activities
Imposes Navigational Hazard (Worst Case Risk)	<ul style="list-style-type: none"> Vessel impact (collision) Adverse weather event Mooring line failure Third party intervention Corrosion of topsides penetrations/hatches RTM Ballast increase due to flooding of compartments Increased weight on RTM from mooring line trenching 	<ul style="list-style-type: none"> 500m exclusion zone on marine charts (Control 0000030238) Enfield SIMOPs Plan (Control 0000035225) Impressed Cathodic Protection System (Control 0000030585) RTM Indicated on marine charts (Control 0000030439) Internal coating (Control 0000030573) - Control potentially no longer effective. Compartment #3 dosed with corrosion inhibitor April 2022 	<ul style="list-style-type: none"> Mooring line disconnection – complete 8th Feb 2023 (Control 0000040582 & 0000040778) Weight reduction - Reduced load as risers removed (Control 0000030571) J Tube plugging and pipe work isolation Accelerated RTM removal Flooded Member Detection survey – complete Feb 2023 (root cause of draft reduction) Drilling of foam compartment to allow pressure equalisation if RTM is expected to sink, which will significantly reduce likelihood or prevent foam release from compartment rupture Readiness for emergency disconnection tow and sink in shallower water If required, sink RTM to seabed to remove submersible hazard to prevent disturbance to other marine users
Unplanned Discharges: RTM (EP 6.7.3)		<ul style="list-style-type: none"> Locked accessible hatches (Control 0000030569) Draft Monitoring and surveillance (Control 0000029409) PSP33 – I&M of Equipment supporting marine navigation (Control 0000030122) including Sentry buoy for partial submergence, navigation lights, active & passive radar 	
Physical Presence: Unplanned Disturbance to Other Marine Users (EP 6.7.6)		<ul style="list-style-type: none"> Signage (Control 0000030570) Emergency Response Plan (Control 0000029087) Standby/Guard vessel call off availability (Control 0000040779) Perform mooring analysis to review impact of mooring line trenching on draft and feasibility of disconnecting mooring lines (Control 0000040582) 	
Physical Presence: Disturbance to Seabed from Dropped Objects and Accidental Sinking of RTM (EP 6.7.8)		<ul style="list-style-type: none"> In the event the RTM sinks below the surface, a survey will be conducted to assess the RTM status Notify AHO and AMSA in event that the RTM becomes submerged Assessment of credible failure modes for RTM maintained 	

3. Forward Plan

Current planning basis subject to change due to vessel and equipment availability, regulator and titleholder approvals and weather and sea conditions.

Item	Activity	Actions	Target Timeline
	Draft Rectification Phase 1	Engineering design (mooring analysis)	Complete
		Obtain Safety Case Revision regulatory approvals	Complete

STRICTLY CONFIDENTIAL

Item	Activity	Actions	Target Timeline
Re-establish or maintain buoyancy of RTM	Mooring line disconnection (3 disconnected)	(SoV approved, validation underway)	
		Environment Plan (EP) Management of Change (MOC)	Complete
		Offshore Procedures	Complete
		Offshore Execution activities	Complete 10 th Feb 2023
	Draft Rectification Phase 2 J Tube & Pipework plugging	Engineering review	Ongoing
		Procurement activities (long lead items)	Purchase Orders placed
		Scope of validation submission	March (Phase 2a) / April (Phase 2b)
		Safety Case Addendum submission	March (Phase 2a) / April (Phase 2b)
		Obtain Safety Case Addendum regulatory approvals	April (Phase 2a and Phase 2b)
		ENVID & EP MOC (To be assessed)	April
		Obtain EP Revision regulatory approvals (if EP Revision required)	N/A
		Hazard Risk Assessments including Boarding RTM	April
		Offshore Procedures	Mid March
Offshore Execution activities	Mid April (Phase 2a) / May (Phase 2b)		
Accelerated RTM Removal	Fast track with Heerema	Engagement with Heerema leadership	Closed
	Consult alternative contractors for earlier removal	Discussions held with alternative contractors	Dec 2022 (Closed)
Emergency Plans (if changes to the condition of RTM impact primary removal activity)	Disconnect, Tow and Wet Park	Engineering & Procurement	Commenced
		Offshore Procedure	Commenced
		AMSA towing engagement & approval	Commenced
		Safety Case Addendum submission (if required)	TBA
		Obtain Safety Case Addendum regulatory approvals (if required)	TBA
		EP Revision (12) submission	Complete
		Obtain EP Revision regulatory approvals	TBA
		Offshore Execution activities	Operationally ready from Late April Execution subject to regulatory approvals
		Titleholder engagement and agreement	Ongoing

STRICTLY CONFIDENTIAL

Item	Activity	Actions	Target Timeline
	Sinking on location (Enfield)	Engineering & Procurement	Purchase Orders placed
		Obtain Safety Case Addendum regulatory approval (if required)	TBA
		EP MOC if EP Revision (12) not accepted (to be agreed with NOPSEMA)	TBA
		Offshore Procedures	March
		Offshore Execution activities	Operationally ready from Late April Execution subject to regulatory approvals
Other	Flooded Member Detection Survey	Procurement activities	Complete
		Execution activities	Complete

Summary of changes to the forward plan:

- Draft rectification Phase 2 preparation activities delayed to accommodate Scope of Validation. Execution now split into two campaigns. Phase 2a (Mid April) – Riser removal and prep works, Phase 2b (May) J Tube and ballast pipework plugging.
- Regulatory submissions for emergency plans are pending the outcome of the Environmental Plan submission.

STRICTLY CONFIDENTIAL