

**From:** Huracan <jhollingworth@huracan.com.au>  
**Sent:** Sunday, 3 June 2018 6:06 PM  
**To:** Jon Hollingworth  
**Subject:** Fwd: OP Registration Requirements

Begin forwarded message:

**From:** BROADFOOT Angus <[Angus.Broadfoot@dnrme.qld.gov.au](mailto:Angus.Broadfoot@dnrme.qld.gov.au)>  
**Date:** 31 May 2018 at 09:35:52 AEST  
**To:** "jhollingworth@huracan.com.au" <[jhollingworth@huracan.com.au](mailto:jhollingworth@huracan.com.au)>, "COLEMAN Cecily" <[Cecily.Coleman@dnrme.qld.gov.au](mailto:Cecily.Coleman@dnrme.qld.gov.au)>  
**Cc:** BROOKER Daryl <[Daryl.Brooker@dnrme.qld.gov.au](mailto:Daryl.Brooker@dnrme.qld.gov.au)>  
**Subject:** RE: OP Registration Requirements

Hi Jon,

Thanks for your enquiry. Based on the description of your services, it does not appear that your plant triggers the definition of *operating plant* – see s670 in the *Petroleum and Gas (Production and Safety) Act 2004* (P&G Act). As such, you are not required to appoint roles such as *operator* and *site safety manager* under the P&G Act.

Please be aware however, again from the description provided, that your plant, service and work will be located *at* operating plant and will interact with operating plant. The P&G Act therefore applies to you and your workers while performing the tasks described and particular obligations apply to all persons at operating plant.

Furthermore, the well operator and the rig operator have obligations to implement a safety management system (see ss674 & 675) that identifies and manages risks, controls, responsibilities, etc, relating to interactions with contractors. Persons are required to comply with those safety management systems and to follow lawful instructions given (see ss702 & 703). Failure to comply with such requirements may be an offence under the act.

While this is not legal advice and it is recommended that you seek your own legal advice, I hope this information has been of assistance.

Kind regards,  
Angus



**Angus Broadfoot**  
Principal Project Officer  
**Office of the Chief Inspector | Petroleum and Gas Inspectorate**  
Resources Safety and Health  
Department of Natural Resources, Mines and Energy

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**P:** 0428 988 091  
**E:** [angus.broadfoot@dnrme.qld.gov.au](mailto:angus.broadfoot@dnrme.qld.gov.au)

**A:** Landcentre, Podium 2, 867 Main Street, Woolloongabba QLD 4102

**W:** [www.dnrme.qld.gov.au](http://www.dnrme.qld.gov.au)

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**From:** [jhollingworth@huracan.com.au](mailto:jhollingworth@huracan.com.au) [mailto:[jhollingworth@huracan.com.au](mailto:jhollingworth@huracan.com.au)]

**Sent:** Wednesday, 30 May 2018 4:00 PM

**To:** COLEMAN Cecily <[Cecily.Coleman@dnrme.qld.gov.au](mailto:Cecily.Coleman@dnrme.qld.gov.au)>

**Cc:** BROADFOOT Angus <[Angus.Broadfoot@dnrme.qld.gov.au](mailto:Angus.Broadfoot@dnrme.qld.gov.au)>; BROOKER Daryl

<[Daryl.Brooker@dnrme.qld.gov.au](mailto:Daryl.Brooker@dnrme.qld.gov.au)>

**Subject:** RE: OP Registration Requirements

Hi Angus and Daryl,

Just wondering if you have had a chance to look at our case? If you require any additional information please do not hesitate to drop me an email.

Thanks and regards

**Jon Hollingworth**

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**From:** COLEMAN Cecily <[Cecily.Coleman@dnrme.qld.gov.au](mailto:Cecily.Coleman@dnrme.qld.gov.au)>

**Sent:** Tuesday, 29 May 2018 9:50 AM

**To:** [jhollingworth@huracan.com.au](mailto:jhollingworth@huracan.com.au)

**Cc:** BROADFOOT Angus <[Angus.Broadfoot@dnrme.qld.gov.au](mailto:Angus.Broadfoot@dnrme.qld.gov.au)>; BROOKER Daryl

<[Daryl.Brooker@dnrme.qld.gov.au](mailto:Daryl.Brooker@dnrme.qld.gov.au)>

**Subject:** FW: OP Registration Requirements

Good morning Jon

Thank you for your email. The definition of OP can be confusing.

Angus Broadfoot (Principal Project Officer – responsible for the OP Reform Project) and Daryl (Deputy Chief Inspector) are going to take responsibility for your inquiry. Both are copied into this reply.

Kind regards

Cecily



**Queensland  
Government** Cecily Coleman

**Project Manager**  
**Resources Safety and Health**  
**Department of Natural Resources, Mines and**  
**Energy**  
P 07 3199 8043  
E [cecily.coleman@dnrme.qld.gov.au](mailto:cecily.coleman@dnrme.qld.gov.au)  
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**From:** [jhollingworth@huracan.com.au](mailto:jhollingworth@huracan.com.au) [mailto:[jhollingworth@huracan.com.au](mailto:jhollingworth@huracan.com.au)]  
**Sent:** Tuesday, 29 May 2018 9:17 AM  
**To:** 'Mike Cunnington' <[mike@earthreach.org](mailto:mike@earthreach.org)>; COLEMAN Cecily  
<[Cecily.Coleman@dnrme.qld.gov.au](mailto:Cecily.Coleman@dnrme.qld.gov.au)>  
**Subject:** RE: OP Registration Requirements

Thanks Mike for the introduction.

Hi Cecily,

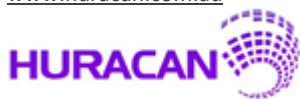
For some additional information on our involvement;  
I have attached a picture of a unit working in New Zealand.  
The purpose of the unit is to place a downhole pressure gauge in the well, the gauge is connected to the cable and then strapped to the side of the pipe/tubing that is run in the hole. Once the gauge and cable is strapped to the pipe the workover rig is in control of running it in. The unit is air operated but the air is only used to apply a small amount of back-tension on the cable to keep the cable tight while running in hole (equivalent to two people holding tension on the reel). It does not require any intervention or controls to be touched while running in. I have reviewed " Guideline to what is Operating Plant and interaction of safety legislation for petroleum and gas industries" and the closest would be Appendix 7 - Geophysical Survey OP Types / Jurisdiction. But we are not conducting a survey with our own unit like a wireline unit, are not responsible for well control, do not take over control of the well, but simply installing a pressure gauge used for pump control after the well is put online after the workover rig has departed location.

Cecily, I would appreciate any insight into our requirements to register the unit as operating plant.

Many thanks and regards

**Jon Hollingworth**

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**From:** Mike Cunnington <[mike@earthreach.org](mailto:mike@earthreach.org)>  
**Sent:** Monday, 28 May 2018 4:19 PM  
**To:** COLEMAN Cecily <[Cecily.Coleman@dnrme.qld.gov.au](mailto:Cecily.Coleman@dnrme.qld.gov.au)>  
**Cc:** Huracan <[jhollingworth@huracan.com.au](mailto:jhollingworth@huracan.com.au)>  
**Subject:** OP Registration Requirements

Cecily,

I wonder if I could trouble you again, this time on behalf of an associate with a small business installing gauges into oil and gas wells. He, Jon Hollingworth, is wondering if it is a requirement he register his spooling devices as Operating Plant in Queensland. He currently brings these units to an existing rig to allow the gauges to be installed down hole.

I have copied him on this email, if you can help, or refer him to someone that can, we'd be most grateful.

Regards

Mike Cunnington  
EarthReach Pty. Ltd.

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