



BEACH PETROLEUM LIMITED



AUSTRALIAN DRILLING ASSOCIATES



OCEAN PATRIOT

SPIKEY BEACH-1 EXPLORATION WELL DRILLING PROGRAM

HEALTH, SAFETY & ENVIRONMENT MANAGEMENT PLAN

REV 0

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HSE Management Plan

Table of Contents

1.0	Introduction	3
1.1	Project Description	3
1.1.1	Ocean Patriot	3
1.1.2	Beach T/38-P Spikey Beach-1 Well Drilling Program	3
1.2	Purpose:	4
1.3	Scope	5
1.4	HSE Objectives	5
1.5	Reference Documents	5
1.6	Abbreviations	7
2.0	Safety Management.....	8
2.1	Policy and Objectives	8
2.2	Organisation and Responsibilities.....	8
2.3	Worker Involvement and Consultation	9
2.4	Hazard Identification and Risk Management	11
2.5	Hazard Management	11
2.6	Employee Selection, Skill & Competency and Training	12
2.7	Contractor Management	13
2.8	Safe Working Procedures.....	13
2.9	Safety Features and Systems.....	14
2.10	Safety Incident Reporting	14
3.0	Health Management.	15
3.1	Health System	15
3.1.1	Diamond / ADA.....	15
3.1.2	Air and Sea Transport Providers.....	15
3.2	Medical Evacuation (MedEvac)	16
4.0	Environmental Management	17
4.1	Referral.....	17
4.2	Environment Plan	17
4.3	Environment Protection Assessment and Risk Management.....	17
4.4	Oil Spill Reporting.....	17
4.5	Migratory Mammals	18
4.6	Environmental Incident Reporting.....	18
5.0	Emergency Management.....	19
5.1	Drills and Exercise	20
5.2	Evacuation.....	20
6.0	Performance Measurement	21
6.1	Environmental Reporting	21
6.2	Safety & Health Reporting	21
7.0	Audit and Review	23
8.0	Appendices	25
8.1	ADA Health Safety & Environment Policy	25
8.2	Beach Petroleum Health Safety & Environment Policy	26
8.3	ADA Drug & Alcohol Policy.....	28
8.4	ADA Offshore Mini HSE Audit	29
8.5	ADA HSEMS / BEACH HSE Policy & Diamond Offshore SMS & EMS Interface.....	30
8.6	Relationship Table – of Beach T/38-P Spikey Beach-1 Drilling Program HSE MP to ADA HSE MS Standards.....	33



HSE Management Plan

1.0 Introduction

1.1 Project Description

1.1.1 Ocean Patriot

Australian Drilling Associates (ADA) will manage the procurement, well planning and operations activities on behalf of the Beach Petroleum. The total project time is expected to be approximately 25 days.

The Diamond Offshore International Corporation's (Diamond) operated "Ocean Patriot" Semi-submersible rig has been contracted to drill the Spikey Beach-1 well. The Ocean Patriot is a semi submersible type mobile offshore drilling unit of the Trosvik Bingo 3000 design built in 1983 and the basic rig design is in accordance with American Bureau of Shipping (ABS) "Rules for Classification and Construction" to obtain the Class Notation A1 column stabilised mobile offshore drilling unit mobile drilling unit for worldwide operation.

The rig design is a twin hull configuration with six (6) stability columns, a transverse truss arrangement between the columns and a main deck supported by the columns and trusses. This rig has the capability to operate worldwide in water depth up to 1,500 feet with a drilling capability of 30,000 feet.

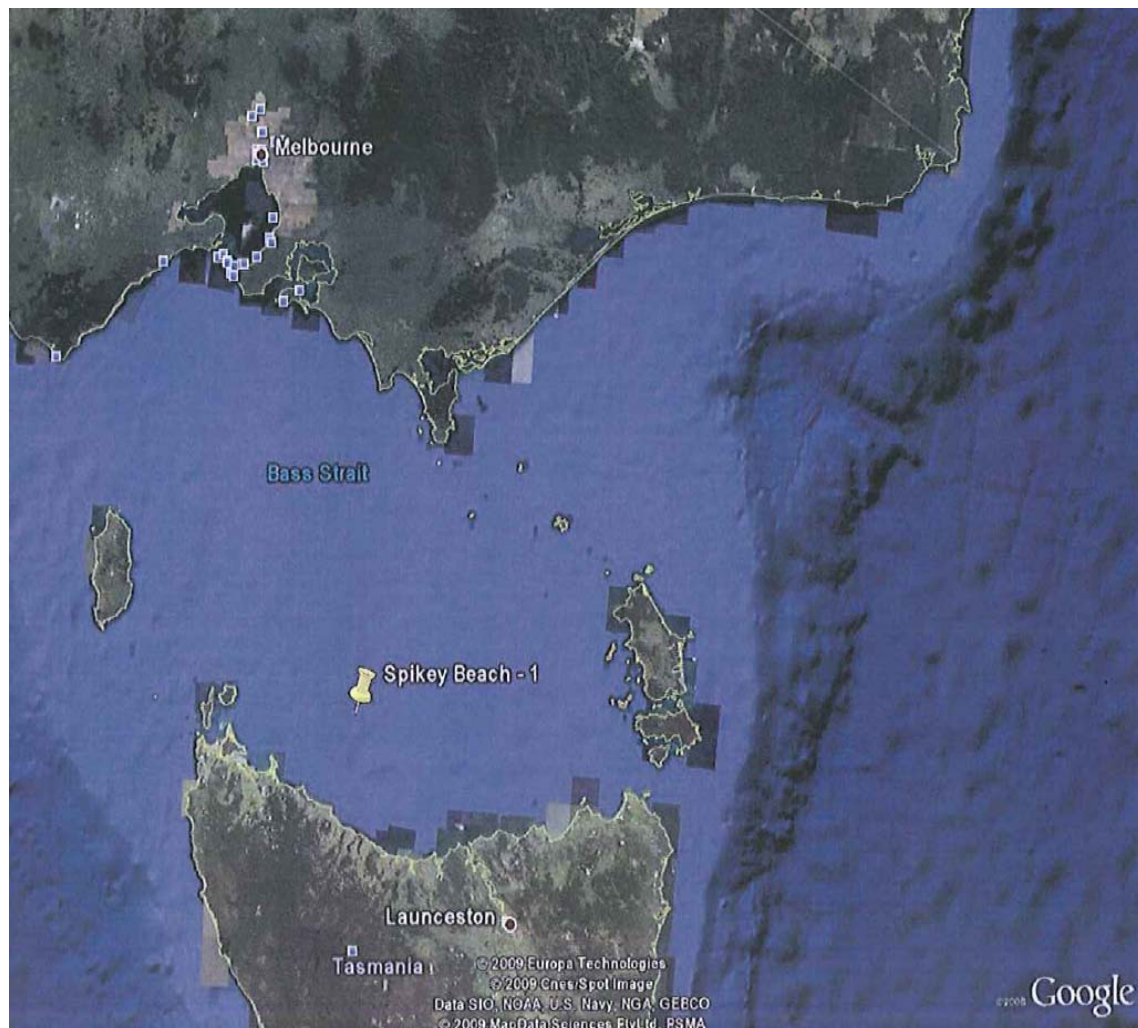
1.1.2 Beach T/38-P Spikey Beach-1 Well Drilling Program

ADA will manage the Semi-submersible drilling rig on behalf of Diamond. Spikey Beach-1 well in the T/38-P exploration permit located in the Bass Basin, north of Tasmania, Australia, is the well to be managed under this well drilling program (Figure 1).

The expected Spikey Beach-1 well duration in will be approximately 25 days.

HSE Management Plan

Figure 1: Spikey Beach-1 Well Location in Bass Basin



1.2 Purpose:

The purpose of this Beach T/38-P Spikey Beach-1 Exploration Well Drilling Operations Health Safety Environment Management Plan (HSE MP) is to:

- Define and communicate the Health, Safety and Environment (HSE) objectives, principles, expectations and requirements for the this drilling program;
- Describe areas of HSE responsibilities and accountabilities for the Semi-submersible drilling activities including service providers;
- Define the relationship/interface of the Beach Petroleum T/38-P Spikey Beach-1 drilling operations HSE MP to other documentation including the ADA Health Safety Environment Management System (HSE MS) 20 Standards. It is expected the Relationships table in section 9.4 of this document will be used periodically during the drilling activities as an overall expectation/compliance check.



HSE Management Plan

1.3 Scope

This HSE MP applies to all drilling activities and includes all support third party / service providers engaged as part of the drilling operations for Beach's T/38-P Spikey Beach-1 exploration well.

1.4 HSE Objectives

The Beach T/38-P Spikey Beach-1 drilling operations will strive to achieve completion of the entire operations program with a target of zero accidents/incidents, injuries or environmental damage. Thus, the HSE Management Plan summary in Figure 2 details out the documents & reference interface, implementation plans (involving policy / planning, organisation, implementation, performance measurement / review and audit) and arrangements of key project management commitments.

This project objective of the drilling operations is to protect the safety and wellbeing of personnel and the environment during all project activities and to ensure that HSE is the prime consideration in the project execution.

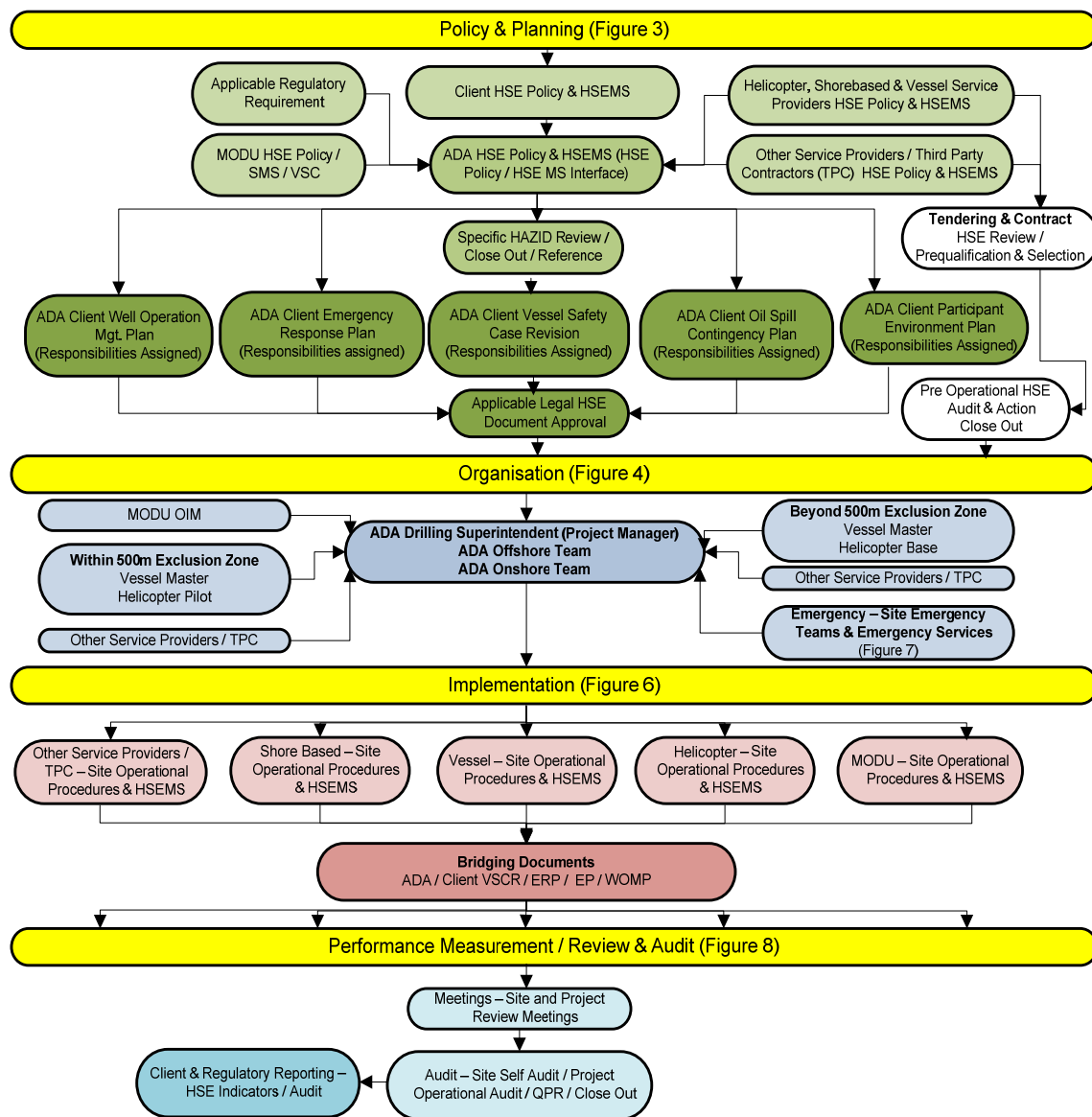
1.5 Reference Documents

The HSE MP will encompass all activities managed by ADA using the Ocean Patriot MODU as part of the Beach T/38-P Spikey Beach-1 drilling operations. The HSE MP is to be referenced in conjunction with:

- 02-02 ADA HSE Plan [New Document]
- 02-02 ADA HSE Management System – 20 Standards (Appendix 8.5);
- Beach T/38-P Spikey Beach-1 Emergency Response Plan;
- Beach T/38-P Spikey Beach-1 Safety Case Revision;
- Bass Basin Drilling Program Environment Plan for Spikey Beach-1 (DIER)
- Ocean Patriot MODU Vessel Safety Case;
- Diamond Offshore Emergency Response Manual;
- Diamond Offshore Global Excellence Management System (GEMS).

HSE Management Plan

Figure 2: ADA Client Drilling Operations
General HSE Management Plan Summary for Australia Operations



HSE Management Plan

1.6 Abbreviations

Item	Description
ADA	Australian Drilling Associates
ALARP	As Low As Is Reasonably Practicable
AMSA	Australia Maritime Safety Authority
API	American Petroleum Institute
BEACH	Beach Petroleum Limited
BOP	Blow Out Preventer
BOSIET	Basic Offshore Safety Induction Emergency Training
CASA	Civil Aviation Safety Authority
DIER	Department of Infrastructure, Energy & Resources
DEWHA	Department of the Environment, Water, Heritage & the Arts
DWOP	Drilling Well On Paper
EMT	Emergency Management Team
EP	Bass Basin Drilling Program Environment Plan
EPA	Environment Protection Agency
ERP	Emergency Response Plan
ERT	Emergency Response Team
FSA	Formal Safety Assessment
GEMS	Global Excellence Management System
HAZID	Hazard Identification Study / Review
HSE	Health, Safety and Environment
HSEMP	Health, Safety and Environment Management Plan
HSEMS	Health, Safety and Environment Management System
HUET	Helicopter Underwater Escape Training
JSA	Job Safety Analysis
KPI	Key Performance Indicator
MODU	Mobile Offshore Drilling Unit
OIM	Offshore Installation Manager
OPGGSA	Offshore Petroleum Greenhouse Gas Storage Act 2006
OSCP	Oil Spill Contingency Plan
P(SL)A	Petroleum (Submerged Land) Act
PTW	Permit To Work
QPR	Quarterly Performance Review
SMS	Safety Management System
SOPEP	Shipboard Oil Pollution Emergency Plan

HSE Management Plan

Item	Description
TPC	Third Party Contractor
VSC	Vessel Safety Case
VSCR	Vessel Safety Case Revision
WOMP	Well Operation Management Plan

2.0 Safety Management

2.1 Policy and Objectives

ADA HS&E Policy is a statement of commitment that Health, Safety and the protection of the Environment is equally important to other business requirements. There is an expectation that all those involved in the drilling of Spikey Beach-1 will abide by this policy, which will be made available.

Based on the HSE Management Plan summary, it is the responsibility of all those associated in the drilling of Spikey Beach-1 drilling program and the accountability of line and senior managers to comply with the Offshore Petroleum and Greenhouse Gas Storage Act 2006 Schedule 3 and the applicable regulations including the P(SL) (Management of Safety on Offshore Facilities) Regulations 1996 as a minimum requirement.

Regulatory reference is one of the elements being reviewed prior to and during the development of the legal approved documents with responsibilities being appropriately assigned (Figure 3). ADA HSE will closely review the regulatory compliance level of the project line management and contractor management in various forums such as Daily Drilling meetings, Weekly HSE Conference Call, Quarterly QPRs etc. during the drilling of the well.

The objectives are to reduce health and safety risks and adverse impacts on the environment to as low as is reasonably practicable (ALARP) and to ensure that no serious injury or environmental damage occurs.

2.2 Organisation and Responsibilities

The ADA HSEMS shall be the main document reference for activities beyond the 500m exclusion zone. The respective EMAS Offshore Vessel Safety & Environmental Management Manual (SEMM) and Bristow Helicopters Safety Management System Manual (SMSM) shall be applicable operationally and respectively on board the the vessel and helicopter. Beach Petroleum HSE Policy has been reviewed with ADA and common commitments are identified as Figure 3.

As detailed in Figure 2 and the respective legal approved documents such as Beach T/38-P Spikey Beach-1 exploration well's VSCR, ERP and WOMP, all personnel involved in the drilling of the well including ADA Drilling Superintendent as the well drilling program's Project Manager, ADA Offshore Drilling Supervisor, ADA Offshore HSE Advisor and other project personnel shall be accountable and are expected to lead by example, promote HSE and demonstrate the required commitments. The HSE management and reporting structure relevant to all personnel involved in the drilling of Spikey Beach-1 is provided in the Figure 4.

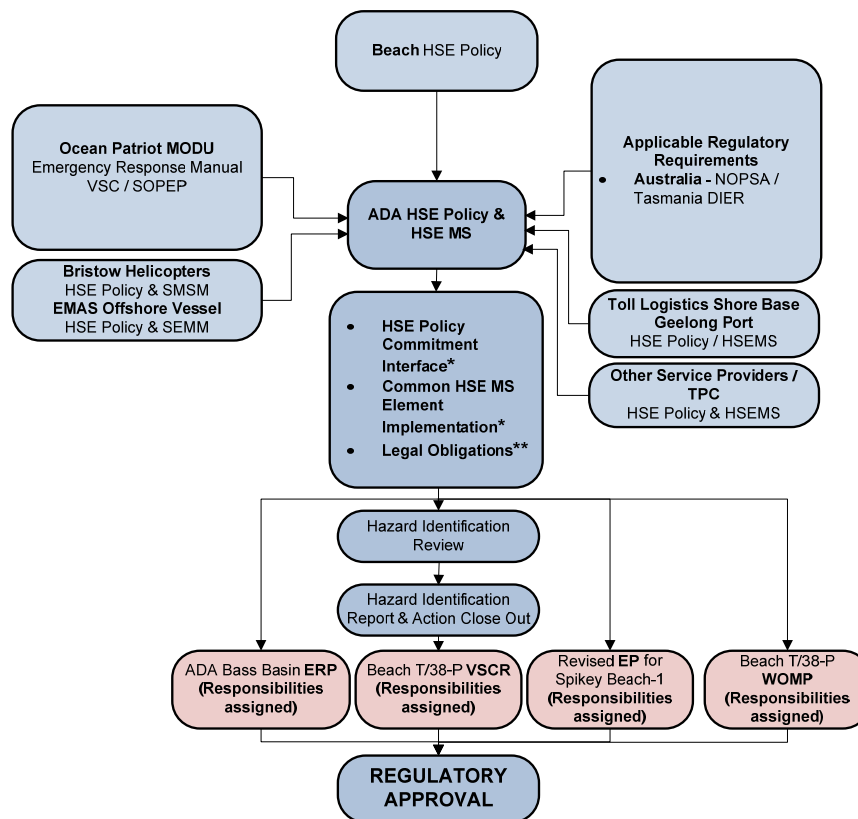
The roles and responsibilities of the involved parties i.e. ADA, MODU and contractors in the drilling of Spikey Beach-1 are periodically reviewed during the Daily Drilling Meeting, Weekly HSE Conference Call and Quarterly Contractor Performance Review etc.

Within the 500m exclusion zone, the Ocean Patriot OIM or delegated supervisory personnel, is

HSE Management Plan

ultimately responsible for all drilling related activities on board the Ocean Patriot. Third Party contractors and service providers including Vessel and Helicopter working, within the 500m vicinity or on the Ocean Patriot MODU shall work in accordance with the Diamond Ocean Patriot Safety Management System (SMS), particularly in the adoption of the Ocean Patriot Permit to Work (PTW) system. Service company personnel shall report to the ADA Offshore Drilling Supervisor (DSV) while on board the Ocean Patriot and in addition shall also be accountable to the Ocean Patriot OIM or applicable Diamond area supervisors for work activities on board the Ocean Patriot.

Figure 3 Beach T/38-P Spikey Beach-1 Well Drilling Program HSE Policy & Planning



Note:

* HSE Policies and HSEMS from various project service providers shall be referred to and reviewed. Additional scope shall be focused accordingly.

** Legal obligations arrangements are planned out in the legal approved documents.

2.3 Worker Involvement and Consultation

In order to ensure a successful Beach T/38-P Spikey Beach-1 drilling program in the Bass Basin, all parties (Diamond / Third party contractors / Service provider company personnel), especially the members of the upcoming shift contractor employees and their supervisors, are accordingly required to proactively participate in the day to day work planning such as Toolbox meetings, Safety Meetings, and the DWOP (Drilling Well on Paper).

During the pre start-up of the drilling program, relevant Ocean Patriot MODU crews shall be engaged in the DWOP (Drilling Well on Paper) session to better understand the specific project HSE obligations and roles & responsibilities.

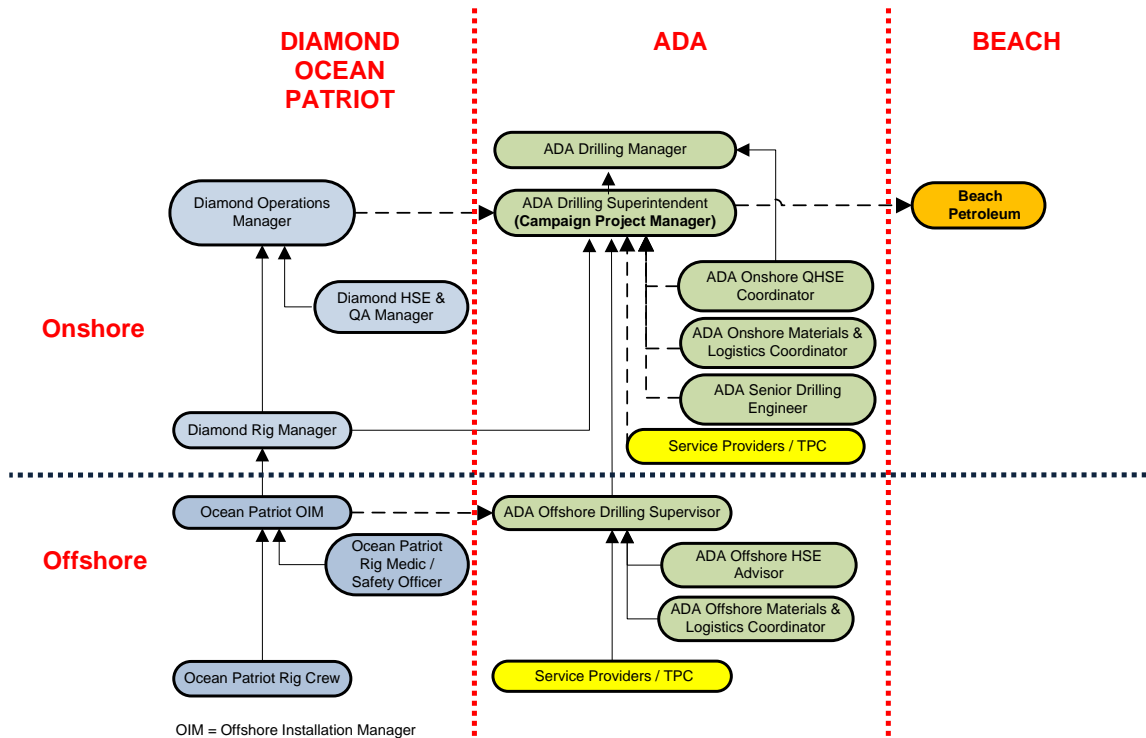
HSE Management Plan

Formal safety meetings are to be held weekly on the rig and all personnel on board the Ocean Patriot are required to attend at least one of the weekly meetings. Meetings such as MODU Pre-Tour meetings will be duplicated to ensure all personnel may attend one. A Weekly HSE Conference Call between the Ocean Patriot MODU, ADA, Beach and main project service providers shall also be held.

Where an individual feels uncomfortable about doing a particular task/activity or is unclear on the procedure, he or she has the right and Beach has the expectation he or she will cease work and seek clarification before proceeding. Any new crew coming to the Ocean Patriot is to be given a thorough rig familiarization session apart from the rig safety induction by his / her Supervisor prior to commencement of work. Involvement in continuously identifying, assessing and correcting hazards is the main required expectation from all the crews.

Copies of all regulatory required Beach T/38-P Spikey Beach-1 – specific documents including the Beach T/38-P Spikey Beach-1 VSCR, ERP and Revised EP for Spikey Beach-1 shall be made available to all crews on Ocean Patriot for review and reference.

Figure 4 Beach T/38-P Spikey Beach-1 Well Drilling Program HSE Management Organisation





HSE Management Plan

2.4 Hazard Identification and Risk Management

The process of well and site risk identification and management is incorporated into the ADA well design process and other accepted design practices.

Project-specific hazards are identified and reviewed in the HAZID Workshop process held on the 15th July 2009. A risk assessment of the drilling operation during the HAZID is conducted. Open control actions shall be closed out and the results will be incorporated into Diamond's existing Hazard Register and other controls. The revised Hazard Register is then included in the Vessel Safety Revision for review and further communication to all project personnel.

In the event of new hazards & controls introduced for tasks carried out for the well drilling program, ADA Offshore HSE Advisor shall conduct the additional risk assessment for Ocean Patriot OIM / ADA Offshore Drilling Supervisor review and if deemed applicable, shall propose to the ADA Drilling Superintendent for corrective action to be made to the Vessel Safety Case Revision Document.

The most important day-to-day hazard identification and risk management tools used by the Ocean Patriot are the Job Safety Analysis (JSA) / Permit To Work (PTW) and the STOP program.

The JSA / PTW process is utilised for each new, unusual, or critical job and acts as a check to minimise risk associated with those tasks. JSA is prepared by the job requester on MODU and co - reviewed by the MODU Safety Officer / ADA Offshore HSE Advisor and approved by the Ocean Patriot OIM. Acknowledgement on the approved JSA is also made by the involved project workers. Communications of involved tasks are made during Pre-tour Meeting etc. on MODU.

Anyone observing a near miss is required to initiate the STOP program with assistance from the OIM or other crew with access to the STOP system. The process shall also be adopted to support the prevention and elimination of injuries by observing unsafe acts and conditions before they result in an injury. Details of the observation system shall be recorded and action taken at a level commensurate with the nature and seriousness of the near miss. Monitoring and close-out is undertaken within the STOP system. ADA Offshore HSE Advisor / ADA Offshore Drilling Supervisor shall closely review the results accordingly for daily Ocean Patriot MODU management update, Daily Drilling meetings and Weekly HSE Conference Call.

2.5 Hazard Management

All of the anticipated physical hazards within the Beach T/38-P Spikey Beach-1 drilling project from the result of the risk assessment process held earlier shall be maintained in the Ocean Patriot hazard register. If considered applicable, new control actions coming out from the risk assessments shall be informed by ADA Offshore HSE Advisor and included in the updated Hazard register by ADA HSE Coordinator.

Hazardous substances being used on the Ocean Patriot including explosives, compressed gases, drilling mud additives, cementing chemicals, drilling fluids and radioactive sources shall be managed (handled, transported, stored and controlled) appropriately by the Ocean Patriot, as described in the Vessel Safety Case and in accordance with Offshore Petroleum and Greenhouse Gas Storage Act 2006 Schedule 3 and the applicable regulations including the P(SL) (Management of Safety on Offshore Facilities) Regulations 1996. Involvement of any specific hazardous substances shall be declared in the intended risk assessment or Safety Job Analysis, prior to job start on MODU. The Ocean Patriot Hazard Register shall be updated accordingly if new or hazardous substances with impacts are introduced.

At the Toll Logistics shore based point in Geelong Port, the compliance of the Victorian Dangerous Goods Act 1985, Victorian Radiation Act 2005 and Victorian OHS Regulations 2007 by all ADA service providers or third party contractors shall be monitored accordingly prior to any

HSE Management Plan

material transfer to the EMAS Offshore vessels.

The Toll Logistics Shore Base Supervisor in Geelong Port shall ensure that all declarations and manifesting requirements are fulfilled including ensuring all products to be shipped to MODU are equipped with the required Material Safety Data Sheets (MSDS). Third Party Contractors / Service providers shall ensure that copies of manufacturer's MSDS are supplied with all products delivered prior to being loaded onto the vessels heading offshore for usage by the vessel crews and MODU drilling operation and back – loading for waste disposal.

All personnel at the Toll Logistics Shore Base in Geelong Port, EMAS Offshore vessels and on the MODU are responsible for reviewing and following the products' MSDS precautions for safe use, PPE requirements and other instructions, before handling or using any potentially hazardous product. The requirement of having such MSDS shall be attached along with the JSA of the intended work. Products without appropriate MSDS documentation shall not be loaded to the vessels heading offshore.

2.6 Employee Selection, Skill & Competency and Training

All personnel travelling to the Ocean Patriot, will undergo mandatory pre-start induction at the well site upon arrival, and will be communicated on the operational, safety responsibilities and the incident reporting and management structure surrounding the positions of all personnel.

All personnel travelling to the Ocean Patriot in Australia waters shall hold current BOSIET including HUET certificates from an acceptable internationally recognised training provider e.g. by OPITO, and a valid UKOOA or equally acceptable Offshore Medical Certificate. ADA Onshore Aviation Coordinator validates, reviews, maintains relevant record keepings via the OPMS and ensures the offshore travelling requirement compliance as per Figure 5. For the Beach T/38-P Spikey Beach-1 drilling program, the ADA Drilling Superintendent shall be the approval point of contact for any offshore travelling requests.

Diamond has a structured training needs analysis/training matrix/development programme that covers safety management for all levels of Ocean Patriot MODU employees including third party contractors and visitors, covering these critical aspects of safety management. The Ocean Patriot Safety Officer shall maintain training and competency records on the rig for audit purposes. Similarly using the structured training process tools, respective supervisors or the third party contractors on Ocean Patriot shall ensure that their workers have appropriate training & certificates and that records are kept and maintained. All relevant training and competency records shall be referred during JSA preparation and audit purposes. This ensures all personnel at site are competent to participate in the Permit-to-Work process and in JSA preparation and are aware of their specific Well Control and Emergency Response responsibilities.

All ADA and service provider companies' involved in the drilling of Spikey Beach-1 shall have systems for the selection and placement of people with appropriate experience, knowledge and skills. The line managers of the service providers shall review the employment and training history of prospective employees to ensure that they are suitable for their envisioned role. The appropriate skills and competency systems for Service Providers shall be reviewed by ADA during the Contractor Prequalification Process and Quarterly Performance Review meetings. Required elements of skills and competency process for ADA review include the presence of training needs analysis, training matrix and training management including training records.

The ADA Contractor Prequalification process within the ADA Contractor Management Guideline is also available to assist in the monitoring the acceptable level of competency of main service providers.

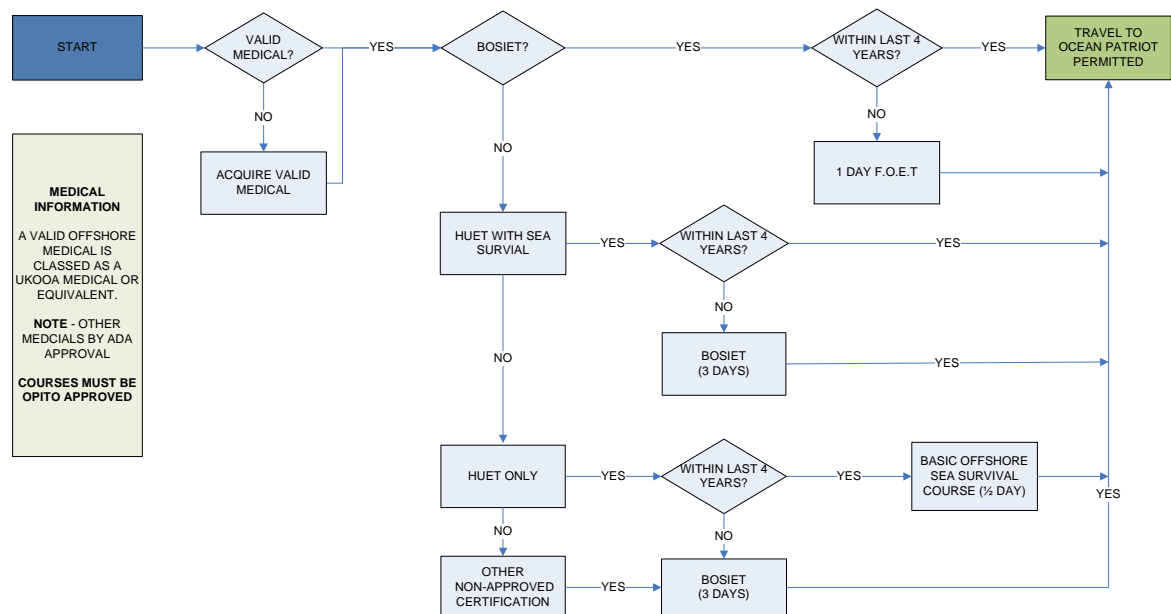
Job descriptions identifying position minimum skills and experience requirements should be used as part of the selection criteria. Where tasks have been identified as requiring competence (particularly to satisfy regulatory requirements) the standards shall be included in the relevant job descriptions.

HSE Management Plan

All Marine Union personnel (Deck Officers, Engineers, and Seaman) are required to hold a current AMSA's Marine Qualification for that position. In addition, they must hold a current medical certificate from AMSA approved medical practitioners.

All aircrew shall hold current CASA certifications and a current CASA medical certificate. The ADA Drilling Supervisors must hold current Well Control certificates and be trained in the requirements of the ERP for the drilling of Beach's Spikey Beach-1 exploration well.

Figure 5: Minimum Offshore Traveling Requirement for Beach T/38-P Spikey Beach-1 Drilling Program.



2.7 Contractor Management

All Contractors participating in the drilling of Spikey Beach-1, including third party contractors, supplier and service providers shall be managed (selected and monitored) accordingly as per Figure 1. Questionnaires shall be sent to all potential contractors as part of qualifying them for meeting the minimum HSE requirement of this well drilling program. The Contractors shall generally be selected through a tendering process, followed by a kick off meeting. As part of the monitoring program, a series of review meetings and periodic audits shall be held to ensure contract of service compliance.

ADA will encourage and support a positive and proactive working relationship with service providers and third party contractors. Service providers and contractors must ensure appropriate systems and processes are in place and include:

- Skills and competence training processes. Copies of the documents shall be held and maintained on the rig by the MODU Safety Officer / ADA HSE Advisor for audit purposes.
- Risk Management including HAZID awareness and hazard identification (HAZID) and approved controls.
- Demonstrating employee involvement and participation e.g. job start meetings, tool box meetings (pre – tour meetings) etc.

2.8 Safe Working Procedures

HSE Management Plan

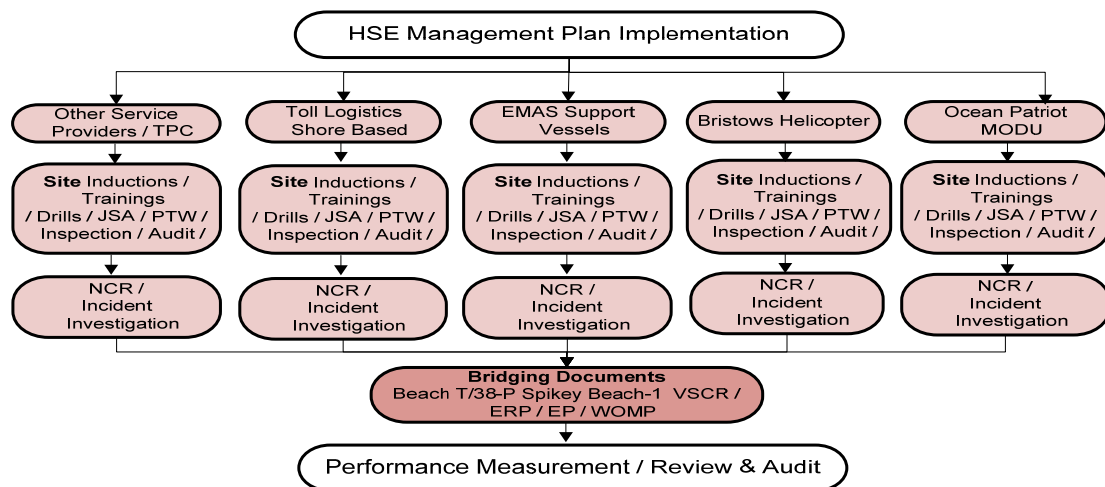
Within the 500m exclusion zone of the well site, current Diamond SMS that applies to tasks performed will be followed. The Ocean Patriot OIM is ultimately accountable for the safe completion of all tasks performed on the Ocean Patriot by ensuring effective implementation of the Diamond "Permit to Work" system and the Job Safety Analysis (JSA) process (Figure 6).

For all Diamond activities, service company activities or joint Diamond / Service Company tasks, a Job Safety Analysis shall be conducted as the primary pre-job planning tool prior to commencing that task and where appropriate the task will be controlled via the Diamond's PTW system. ADA Offshore HSE Advisor shall review the prepared JSA prior to start of work.

All personnel transfer to and from the rig via helicopter during normal drilling operation or via the work boat (support vessels) / basket during emergency if required, will be conducted in accordance with set procedures, referred in the Beach T/38-P Spikey Beach-1 well drilling program Vessel Safety Case Revision Document.

Special attention on lifting tasks shall be conducted in accordance with the Ocean Patriot SMS and UKOOA Safe Packing and Handling of Cargo To and From Offshore Locations 2002.

Figure 6: HSE Management Plan Implementation – Beach T/38-P Spikey Beach-1 Drilling Program



2.9 Safety Features and Systems

The safety features and systems of the Ocean Patriot are detailed in the Ocean Patriot Vessel Safety Case, Facility Description. The vessel drawings detailing key process equipment, process flow, safety equipment, escape routes, and protective systems are found in the Ocean Patriot Vessel Safety Case. Diamond, through the line management of third party / service provider companies' shall be responsible for maintaining those features and systems at design operability (including having updated operability certificates) and managed in accordance with the Diamond Ocean Patriot PTW system shall be held onboard. The process will further be reviewed by the ADA Drilling Supervisor and Ocean Patriot OIM.

The wellhead details and the structural layout / arrangement of the well including well schematics are held in the ADA Senior Drilling Engineer's and ADA Drilling Supervisor's files.

2.10 Safety Incident Reporting

All companies associated with the drilling of Beach Petroleum's Spikey Beach-1 in T/38-P shall promote and encourage proactive reporting including the reporting of all **near misses, incidents (including dangerous occurrence) and accidents**. An incident/accident investigation shall be

**HSE Management Plan**

conducted as soon as possible after the occurrence to the level appropriate to the actual and potential severity of the incidence and an analysis made to define the action(s) required to prevent a reoccurrence of a similar event. ADA Offshore HSE Advisor shall produce the ADA Flash reports with the intent of providing preliminary incident findings for ADA / Beach management review. The investigation team shall be made up of the appropriate resources and involved parties, which may include the ADA Offshore HSE Advisor, ADA Drilling Supervisor, Ocean Patriot Safety Officer, Ocean Patriot OIM and the relevant service providers' supervisors as required. The final incident report shall be produced by the investigation team as soon as practicable. The ADA Drilling Superintendent shall be responsible for final report review to ensure effective investigations are being carried out and Beach Petroleum will be copied on all completed reports.

The results of any near miss, incident/accident investigation should be reviewed at Ocean Patriot MODU Pre-Tour (Toolbox Meetings), Weekly Ocean Patriot MODU Safety Meetings, Beach Spikey Beach-1 Daily Drilling Meetings and at Weekly Beach HSE Conference Calls that involve adequate participation including Diamond Ocean Patriot, ADA and Beach. Incident investigation close-out actions or controls shall be reviewed accordingly by the meeting participants.

Bristow Helicopters shall be responsible for Civil Aviation Safety Authority of Australia (CASA) reporting requirement compliance.

EMAS Offshore vessel shall be responsible for their AMSA health and safety reporting requirement compliance on board the vessels.

All companies especially Diamond Offshore Ocean Patriot, EMAS Offshore, Bristow Helicopters and Toll Logistics contracted to ADA shall submit monthly personnel hours worked and injury reports & close out actions to the ADA HSE Coordinator prior to the 5th of the following month and immediately after the end of the Beach T/38-P Spikey Beach-1 drilling operation. Diamond HSE & QA Managers are responsible for injury reporting to NOPSA, in accordance with the Offshore Petroleum and Greenhouse Gas Storage Act 2006 Schedule 3 and the applicable regulations including the P(SL) (Management of Safety on Offshore Facilities) Regulations 1996.

3.0 Health Management.**3.1 Health System****3.1.1 Diamond / ADA**

Diamond / ADA including service providers and third party contractors shall ensure all parties on the Ocean Patriot receive a medical pre-employment assessment, hold a valid UKOOA or equivalent medical certificate and have been found to be medically fit for their respective roles prior to mobilisation. Medical records shall be maintained and medical services be provided by qualified Medics on board the Ocean Patriot for the duration of the well drilling program. Assistance and or advice shall be requested / consulted from a shore based medical practitioner, in the event of any diagnosis of a non – routine medical or health condition.

The Ocean Patriot OIM shall be accountable to ensure the available and externally audited MODU hygiene standards including all catering and accommodation cleanliness on the Ocean Patriot are of the highest standard, through detailed periodic inspections and control. The Diamond Safety Management System (SMS) Manual shall be further referred to in regard to the Diamond GEMS Occupational Health Practices and Ocean Patriot's Occupational Health and Hygiene standards.

3.1.2 Air and Sea Transport Providers

The Bristow Helicopters and EMAS Offshore vessels are responsible for ensuring that all of their



HSE Management Plan

support employees including pilots and any direct report third party / service provider company personnel involved in the supply of services to ADA are BOSIET and HUET qualified and have a valid UKOOA or equivalent medical certificate and have been found to be medically fit for their respective roles. Respective medical records shall be maintained accordingly.

ADA Aviation Coordinator shall closely validate control and maintain the records of the all parties involved travelling offshore. ADA Drilling Superintendent shall review and approve all offshore travelling applications.

3.1.3 Offshore Service Providers

Offshore service providers are responsible for ensuring that all their employees and any direct report third party / service provider companies' personnel involved in the supply of services to ADA are BOSIET and / or HUET qualified and have a valid UKOOA or equivalent medical certificate and have been found to be medically fit for their respective roles. Respective medical records shall be maintained accordingly.

The criteria for the assessments should follow the APPEA Guidelines for Medical Fitness to Work Offshore <http://www.appea.com.au/Publications/Safety.asp>. The respective third party / service provider companies' shall maintain medical records (valid UKOOA equivalent medical certificate) of all their employees.

There shall be a zero tolerance policy for possession or consumption of illegal drugs whilst on Spikey Beach-1 project business or work location. ADA reserves the right to conduct random illegal drug and alcohol screening tests and may require any individual participating in the Spikey Beach-1 well drilling program to undergo random drug and alcohol testing to be coordinated by the ADA Aviation Coordinator. The random testing will be carried out by the dedicated Bristow Helicopters Third Party Company at the Bristow Helicopters Base in Essendon with reference made to the ADA Drug and Alcohol policy prior to the scheduled flight. Adequate communications on offshore travelling shall be made during the earlier held DWOP session and in Bristow Helicopters Essendon Base. Random screening for alcohol shall at least be carried out twice per week throughout the drilling operation and ALL passengers scheduled for that randomly selected helicopter travel will be breath – tested. In addition to random screening for alcohol, as the well drilling program project management point, ADA reserves the right to screen personnel for drugs when an at - cause situation exists.

Any individual engaged within the drilling operations, who is required to take prescribed medication, or suffers allergies to medications or substances shall inform their respective employer who will then seek appropriate medical advice as to the individual's fitness to work offshore. Upon arrival at the Ocean Patriot the individual will declare the prescribed medication/allergy to the Rig Medic.

3.2 Medical Evacuation (MedEvac)

MedEvac is the emergency evacuation of an injured or sick person or the transportation of a medical officer to an injured or sick person, by an unscheduled aircraft flight or marine transport. Each MedEvac shall be subject to the specific circumstance, extent of injuries and patient condition with input from appropriate medically qualified persons to determine the appropriate action to be taken.

All MedEvac (subject to weather conditions and the helicopter pilot's discretion) shall be coordinated by ADA through the Bristow Helicopters Base Supervisor in Essendon, in consultation with the OIM, rig medic & with the assistance from the Bristow Helicopters.



HSE Management Plan

4.0 Environmental Management

The Spikey Beach-1 drilling operation shall be managed by ADA. The operations office will be based in Melbourne. Legislation compliance requirement on environment management at minimum include 1) Petroleum (Submerged Lands) (Management of Environment) Regulations 1999, administered by DIER Tasmania, 2) Environment Protection and Biodiversity Conservation Act 1999 and its Regulations 2000, administered by Australia's DEWHA and 3) Environment Protection Act 1970, administered by Victoria EPA (as the wastes coming onshore will be managed from the Geelong Port).

To comply with the Australia legislation, various documents will be submitted for approval. These include:

4.1 Referral

The Referral of the proposed Beach T/38-P Spikey Beach-1 exploration well drilling operation which was earlier planned to be conducted during Bass Basin drilling program and submitted to the Australian Government Department of Environment Water Heritage & Arts (DEWHA), remains valid..

4.2 Environment Plan

The original Environment Plan of the Beach T/38-P Spikey Beach-1 well drilling operation which was earlier planned to be conducted during Bass Basin drilling program and submitted to the Tasmania Department of Infrastructure Energy & Resources (DIER), remains valid. The Environment Plan is implemented to state the project management commitment of preventative and corrective measures to mitigate the consequences during any planned site surveys and actual well drilling program should the environmental hazards identified occur. This demonstrates the management of environmental protection for the permit location and the potential impact on adjacent areas.

To fully demonstrate that the environmental hazards associated with well operations have been identified and that management systems are in place. As directed by the DIER, an Environment Plan Close Out Audit is planned to be held during the course of the well drilling program

4.3 Environment Protection Assessment and Risk Management.

The involved activities include:

- Dialogue and communication between stakeholders and local interested parties;
- Conducting risk assessment and environmental hazard identified workshops; and the
- Management of environmental risk actions.

For each identified risk, management actions for the avoidance or mitigation of the environmental effects are detailed.

4.4 Oil Spill Reporting

The ADA Drilling Supervisor shall be notified when refuelling operations are scheduled. Refuelling operations shall be performed during periods of daylight and calm weather unless in the event of emergency, using transfer hoses with "dry break" couplings and must be continuously overseen by the Ocean Patriot OIM (or designated alternate).

Should an oil spill of any size occur it shall be reported to the Ocean Patriot OIM and the ADA Drilling Supervisor. If deemed necessary and within the reporting requirement in the Bass Basin drilling program Environment Plan and Spikey Beach-1 ERP, the OIM / ADA DSV via the ADA Drilling Superintendent will then inform Beach on the required notification to the appropriate State environmental regulatory body and emergency support services.



HSE Management Plan

The original version of the Spikey Beach-1 drilling operations Environment Plan during Bass Basin drilling program remains valid and details the required emergency response actions in the event of an oil spill.

Further instructions, i.e. spill response action plans, notification plan, and reporting requirements are detailed in the ADA Beach T/38-P Spikey Beach-1 Emergency Response Plan.

Engineering controls to prevent oil spills are detailed in the:

- Ocean Patriot MODU Vessel Safety Case
- Diamond Offshore Ocean Patriot EHS-WCM-01 Well Control Manual

Procedures to prevent and/or minimise oil spills are detailed in the Ocean Patriot Shipboard Oil Pollution Emergency Plan Rev 0.

4.5 Migratory Mammals

Whales, dolphins, and seals may travel through the vicinity of the T/38-P area in the Bass Strait, with Blue Whales likely to be present in the south-eastern area of Australia. Due to the importance of whale sightings (particularly Blue Whales which are an endangered species) in helping to establish population numbers, Environment Australia request the submission of a Whale Sighting Report. Sighting reports provide important information for the conservation and management of these animals.

The Masters of EMAS Offshore Support Vessels (Lewek Swift and Lewek Emerald) shall not knowingly interfere with the activities of whales, dolphins, and seals. When their presence is detected, all efforts, in keeping with the EMSA Offshore Vessel Masters' responsibilities to the safety of their crew, will be made to minimise any interference with their activities.

Should whales be sighted, the supply/support vessels shall not knowingly approach to within a distance of 500 metres. The EMAS Offshore vessel masters and Ocean Patriot OIM shall formally report each sighting as required by the revised Spikey Beach-1 drilling operations Environment Plan (Bass Basin drilling program Environmental Plan).

4.6 Environmental Incident Reporting

A reportable incident is defined in the Petroleum (Submerged Land) (Management of Environment) Regulations 1999 as 'an incident arising out of operations for the activity that is not within the parameters of the environmental performance standards in the Bass Basin drilling program Environment Plan in force for the activity'. In addition, under Clause 285 (1) (b) any petroleum spill greater than 80L is also a reportable incident. Any spill greater than 80L shall immediately be reported by the EMAS Offshore vessel masters or by MODU OIM to the ADA Drilling supervisor, who then shall notify Beach.

Beach shall then notify reportable incidents and submit the required reportable incident report to the Department of Infrastructure Energy & Resources (DIER) as per this procedure. Any unplanned WBM or chemical discharges that are not reportable incidents under the definitions of Regulation 26 of the Petroleum (Submerged Land) (Management of Environment) Regulations 1999 will be recorded internally, with the authority advised, as soon as practicable.

MODU OIM or EMAS Offshore Vessel (Lewek Swift and Lewek Emerald) Masters shall:

- Ensure all oil pollution incidents in Commonwealth waters are reported to Australian Maritime Safety Authority, under Marine Notice 1/1996 (any spills greater than 10t must be reported within one hour);
- Ensure all oil pollution incidents in Tasmania waters are reported to Department of Environment, Parks, Heritage and the Arts, as soon as practicable;
- Notify ADA Drilling Supervisor as soon as practicable on any reportable incidents including

HSE Management Plan

- uncontrolled significant oil spill;
- Submit a written report of the reportable incident to Offshore ADA Drilling Supervisor.

Offshore ADA Drilling Supervisor via ERG Operations Liaison shall:

- Report all reportable incidents (verbally or written) to the Beach Petroleum Drilling Project Manager, as soon as practicable, but within two hours of the incident or ;
- Notify Beach Petroleum Drilling Project Manager as soon as practicable on any reportable incidents including uncontrolled significant oil spill;
- Review and submit the written report of the reportable incident to the Beach Petroleum Drilling Project Manager as soon as practicable, but within three days of the incident or of its detection; and

Beach T/38-P Spikey Beach-1 project Drilling Manager shall liaise with ADA ERG Operations Liaison and:

- Notify all reportable incidents (verbally or written) to the Department of Infrastructure, Energy & Resources Tasmania, as soon as practicable, but within two hours of the incident or ;
- Submit a written report of the reportable incident to the Department of Infrastructure, Energy & Resources Tasmania, as soon as practicable, but within three days of the incident or of its detection.

5.0 Emergency Management.

The Diamond Ocean Patriot Emergency Response Manual shall govern responses to emergencies on, near or within the 500m exclusion zone of the Ocean Patriot. A range of emergency scenarios are covered within the Diamond Ocean Patriot Emergency Response Manual. Where the emergency incident requires assistance beyond the resources of the Diamond Ocean Patriot Emergency Response Manual, the Beach Spikey Beach-1 drilling operations Emergency Response Plan (ERP) shall be implemented.

The Beach T/38-P Spikey Beach-1 well drilling program ERP Addendum and the Beach T/38-P Spikey Beach-1 Vessel Safety Case Revision defines the appropriate reporting and escalation process to be adopted, which will also include the emergency management system for incidents involving workboats in transit from shore base to rig.

The interfaces and lines of communication in the event of an emergency within the Beach Petroleum program are explained in the Spikey Beach-1 well drilling program ERP Addendum. In the event of a major, ongoing emergency or escalating emergency, the Diamond Ocean Patriot Emergency Response Team (ERT) and ADA Emergency Response Group (ERG) and Beach Petroleum Emergency Management Team (EMT) where applicable, are activated to provide a higher level of support and planning from onshore.

Beach Petroleum is responsible for providing sufficient resources to support the necessary level of emergency response. Through the Drilling Project Management Agreement between Beach and ADA, ADA as the drilling project management company, is authorised to take such action as it considers reasonable in emergency situations to respond to an emergency, and to incur all such reasonable expenditure and take all such actions, as ADA may reasonably consider necessary or desirable. Experienced ADA and Diamond Ocean Patriot personnel make up the respective ERT and ERG, and further support can be obtained from associated companies or agencies, as indicated in the Spikey Beach-1 well drilling program's ERP Addendum. Additional specialist resources such as blowout control and oil spill specialists are available on an emergency basis.

All personnel shall become a resource to the Ocean Patriot OIM to assist with emergency management. The ADA Drilling Supervisor / ADA Drilling Superintendent will liaise with the OIM and shall be the communication link to the Beach EMT and all Third Party Contractors / Service Providers. A directory of specific emergency response documents can be found in the Spikey

HSE Management Plan

Beach-1 drilling operations ERP Addendum. ADA shall be responsible for onshore call outs / notifications and coordinate the relevant relative response actions via Beach, Diamond or service providers. Beach Operations Manager or representative shall be the designated person to handle any incoming concerns from the Media.

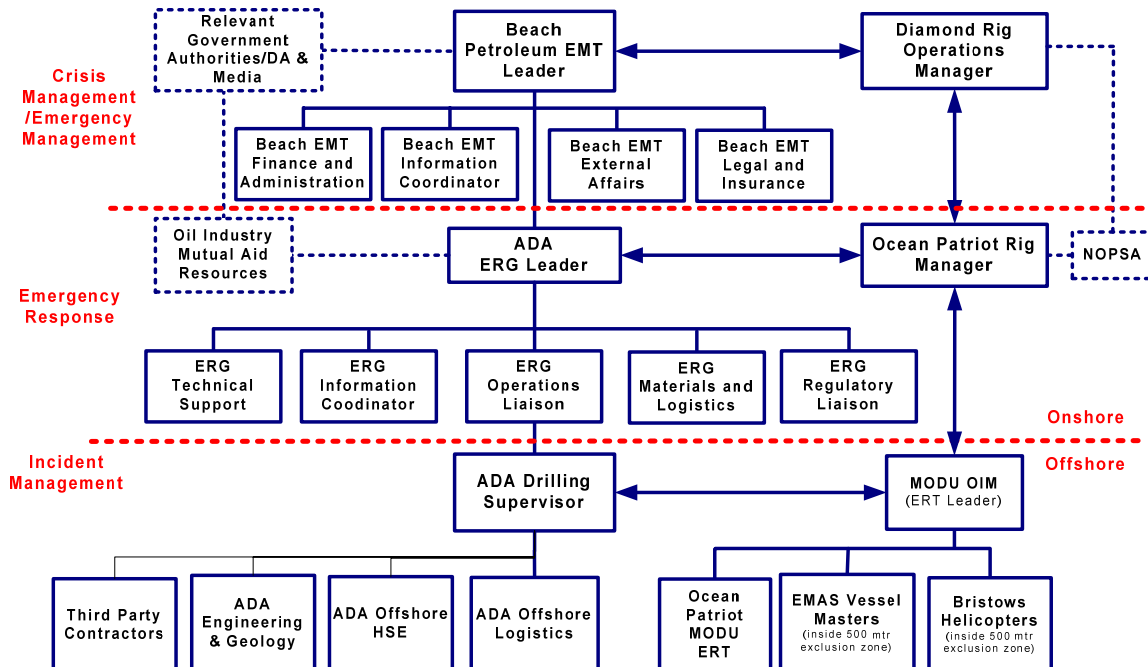
On the Ocean Patriot MODU, there are defined emergency alarm signals, toxic gas alarms, fire and emergency duties, muster points and life boat duties, which are displayed on all Ocean Patriot station bills.

5.1 Drills and Exercise

ADA shall conduct an ERP communications and desktop emergency response exercise at the commencement of the Spikey Beach-1 well drilling program, which will be initiated from the Ocean Patriot by the Offshore ADA Drilling Supervisor (DSV), and the lines of command and ability of the Ocean Patriot ERT and ADA ERG will be tested to adequately respond to an emergency (Figure 7).

The Ocean Patriot MODU will carry out weekly mandatory drills and exercises to ensure all on board personnel are familiarized with emergency alarms, escape routes, lifeboats, life rafts, survival equipment and emergency response command structure/organisation during all reasonable anticipated drilling operational scenarios. Update on drills / exercises shall be given during the Weekly HSE Conference Calls.

Figure 7: Beach T/38-P Spikey Beach-1 Well Drilling Program Emergency Organisation



5.2 Evacuation

Should there be a requirement to carry out an evacuation of the Ocean Patriot, the guidelines provided in the Diamond Ocean Patriot Emergency Response Manual and Spikey Beach-1 drilling operations ERP Addendum shall be adopted. Line managers of associated third party / service provider companies' shall ensure their respective personnel are familiar with the Ocean Patriot evacuation procedures.



HSE Management Plan

The helicopter service provider shall maintain aircraft, support equipment, and aircrews on 24-hour standby, and be contactable for the duration of the Beach T/38-P Spikey Beach-1 drilling operation. Subject to weather condition and the helicopter pilot's discretion, the Bristow Helicopters shall carry out the emergency evacuation when required.

The Bristow Helicopters or EMAS Offshore vessels contracted by ADA shall maintain a supply or standby vessel capable of carrying the complement of the unit, within the 500m exclusion zone and maintaining radio contact with the Ocean Patriot at all times, throughout the Beach T/38-P Spikey Beach-1 well drilling program.

6.0 Performance Measurement

6.1 Environmental Reporting

During the Spikey Beach-1 drilling, ADA will implement an appropriate monitoring strategy of the performance objectives and standards as summarised below in Table 1. These assess compliance with mitigation measures, provide impact assessment verification feedback and also enable an operational response to any significant environmental threat that may arise during the drilling program.

Table 3: Beach T/38-P Spikey Beach-1 Well Drilling Program Environmental Management Monitoring Program

Parameter	Frequency	Data Recipient
Whale sightings	As sighted	ADA, DEWHA
WBM cuttings volume discharged	Daily/End of Well	ADA
WBM volume discharged	Daily/Total (end of well)	ADA
Fuel use: rig, service vessels	Weekly	ADA
Waste volume to shore from rig	On transfer event to shore	ADA
Flare volume, hours	Weekly	ADA
Hazardous materials use	Weekly	ADA
Spills volume	Per incident basis	ADA, (AMSA, DMP if over volume thresholds)
Vessels entering the Safety Zone	Per incident	ADA
MODU Environment Audit held	Monthly	ADA

6.2 Safety & Health Reporting

ADA develops an appropriate monitoring strategy, which assesses compliance with safety and health management, verification feedback and operational response to any significant safety and health hazard that may arise during the drilling program. The ADA HSE management monitoring program is outlined in Table 2 and 3 below. The relevant service providers are required to submit the monthly data as detailed in Table 2. The MODU is required to submit the details as per Table 3 on weekly basis.

Table 1: Beach T/38-P Spikey Beach-1 Well Drilling Program Safety and Health

HSE Management Plan

Management Monitoring Program for Main Service Providers i.e. Vessel, Helicopter, Shore Based & Others

Vessel / Helicopter / Shore Based Parameter	Frequency	Data Recipient
Man Hours	Monthly	ADA / Beach
Drug and Alcohol Random / At Cause Test	Monthly	ADA / Beach
Training / Drill / Induction Held	Monthly	ADA / Beach
NCR & Close out actions	Monthly	ADA / Beach
Near Miss Reporting / Observation	Monthly	ADA / Beach
Property Damage & close out actions	Monthly	ADA / Beach
Spill Incidents & Close out actions	Monthly	ADA / Beach / DA
First Aid Case(s) & Close out actions	Monthly	ADA / Beach
Medical Treatment Case(s) & Close out actions	Monthly	ADA / Beach / NOPSA
Lost Time Incident & Close out actions	Monthly	ADA / Beach / NOPSA

Note: Diamond QM HSE Manager is responsible for hours worked & injury reporting within the Spikey Beach-1 drilling program to NOPSA. ADA / Beach are to be copied.

Table 2: Beach T/38-P Spikey Beach-1 Well Drilling Program Safety and Health Management Weekly Monitoring Program

Diamond Ocean Patriot Parameter	Frequency	Data Recipient
Proactive Safety Efforts	Weekly	ADA / Beach
Work Permits Issued	Weekly	ADA / Beach
Work Permits Active	Weekly	ADA / Beach
Safety Job Analysis	Weekly	ADA / Beach
Work Instructions	Weekly	ADA / Beach
Pre Job Safety Meetings	Weekly	ADA / Beach
Time Out For Safety	Weekly	ADA / Beach
Area Authority Audits / Hazard Hunt	Weekly	ADA / Beach
STOP Reporting Audits	Weekly	ADA / Beach
Management Visits	Weekly	ADA / Beach
Drug and Alcohol Random / At Cause Test	Weekly	ADA / Beach
HSE Audit Outstanding Actions	Weekly	ADA / Beach
Remedial Actions – Open Actions Overdue For Closure	Weekly	ADA / Beach
Safety Critical PM Items Overdue	Weekly	ADA / Beach
Attendance @ Weekly MODU Safety Meeting	Weekly	ADA / Beach
Number Of Safety Stand Downs Recorded	Weekly	ADA / Beach
Lifting Ops & Lifting Equipment (LOLER) Defects Overdue For Closure	Weekly	ADA / Beach
STOP Reporting Close Out %	Weekly	ADA / Beach
Outstanding Items From Safety Bulletin / Safety Alerts	Weekly	ADA / Beach
ADA / Beach Parameter	Frequency	Data Recipient



HSE Management Plan

3 rd Party Attendance @ Weekly Safety Meetings	Weekly	ADA / Beach
Management Visits	Weekly	ADA / Beach
Non Conformance Reports (NCR) Issued	Weekly	ADA / Beach
Review 3 rd Party Risk Assessments	Weekly	ADA / Beach
Critical Task Planning Meetings	Weekly	ADA / Beach
DSV Mini HSE Audits	Weekly	ADA / Beach
DSV To Complete 2 STOP Inputs Per Week At Minimum	Weekly	ADA / Beach

7.0 Audit and Review

To demonstrate that Health, Safety and Environmental Management of the entire Ocean Patriot Consortium well drilling program including the drilling of Spikey Beach-1 are compliant with the expectations of the ADA HSE Plan and this Beach Bass Basin drilling program HSE Management Plan, a series of audits focusing on various pre-operational and operational aspects will be scheduled and conducted by competent ADA auditors or an ADA – assigned Third Party Auditor. The audits include Pre Operational and Operational MODU HSEMS Audits, Support Vessel Providers HSEMS Audits, Shore Based Providers HSEMS Audits, Environment Plan Compliance Close Out Audits, Waste Management Chain of Custody Audits and Helicopter Technical Audits. The entire ADA Beach Spikey Beach-1 Program Audit Plan document shall be referred for the entire drilling program's audit details.

Findings will be reported back to the Ocean Patriot Rig Manager, ADA Drilling Superintendent and Beach T/38-P Spikey Beach-1 Project Drilling Manager. Any item of non-conformance identified by the audits and inspections that is not dealt with at the time of note shall be managed through the Diamond corrective action system.

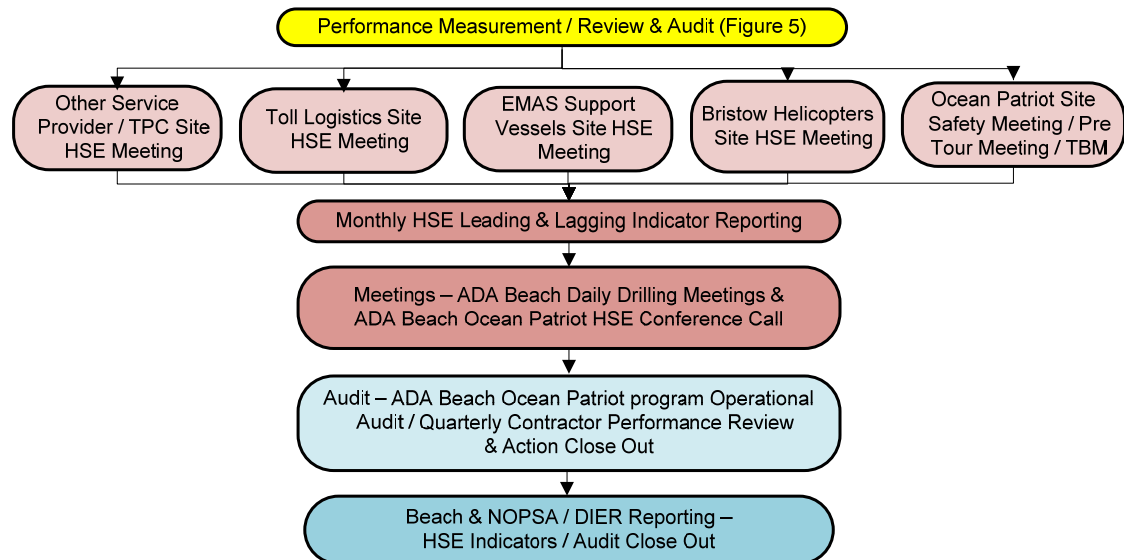
Ocean Patriot MODU, Bristow Helicopters, EMAS Offshore vessels and Toll Logistics Shore Base shall be responsible for their respective internal auditing / self auditing procedures, the results of which shall be available upon request to the NOPSA etc.

ADA, service providers and third party contractors, when working on the Ocean Patriot, will adopt the STOP process for day to day hazard identification. STOP process training will be given by the MODU Safety Officers and held on the MODU accordingly. The objective of STOP process is to prevent, or eliminate injuries by correcting/challenging unsafe acts, inappropriate safety behaviour and unsafe conditions as they occur and before they result in an incident.

During the entire Beach T/38-P Spikey Beach-1 drilling program, mini HSE Audits will be carried out by the ADA Offshore HSE Advisors, ADA Offshore Materials & Logistics and ADA Drilling Supervisors, which will cover the elements as detailed in Appendix 8.4.

HSE Management Plan

Figure 8: Beach T/38-P Spikey Beach-1 Well Drilling Program HSE Performance Measurement





HSE Management Plan



8.0 Appendices

8.1 ADA Health Safety & Environment Policy

ADA Management System	
Australian Drilling Associates Pty Ltd	
Health, Safety and Environmental Policy	
<p>ADA is committed to the application of proactive management in the elimination of injuries, dangerous occurrences and harm to the environment in its efforts to provide a safe, healthy and progressive work environment for all employees, clients and all who come in contact with our operations.</p> <p>To achieve this ADA shall:</p> <ul style="list-style-type: none">• Maintain a work environment that is safe, conducive to high levels of work performance, and in conformance with all ADA's policies, standards and procedures• Endeavour to prevent all injuries and work related ill health, in the work place• Maintain our Management System in compliance with current legislation and apply where relevant, "best practice" methodology in preventing injury, caring for the environment and ensure contractors operate a similar system and suitable interfacing is applied• Establish and maintain, safe systems of work, throughout our operations and ensure contractors operate similar systems and appropriate interfacing exists• Develop commitment, responsibility and accountability to ADA's Health, Safety and Environmental (HSE) objectives and targets• Monitor and analyse all hazards to ensure appropriate corrective actions are applied and verify their effective application• Ensure that all facilities and projects are resourced, designed, engineered and maintained to satisfy legislative and ADA's HSE requirements• Ensure all operations comply with relevant statutory obligations• Encourage open communication with employees and contractors and support participation in all activities related to the improvement and fulfilment of all HSE Issues• Continually develop and support appropriate behaviour to reduce human error with respect to the job, the individual and the team <p> John Bell Managing Director</p> <p>Date: 21-May 2008</p>	
Next Revision: May 2010	<div>Page 1 of 1 Approved 21.05.08</div> <div>Issue No: 2 Rev No: 0</div>

HSE Management Plan

8.2 Beach Petroleum Health Safety & Environment Policy

	HSE POLICIES
HEALTH AND SAFETY POLICY	
<p>Beach Petroleum is committed to the health and safety of employees, contractors and the public through sound management practices.</p> <p>Beach Petroleum will conduct its activities in such a manner as to ensure:</p> <ul style="list-style-type: none">• A healthy and safe workplace for all employees, contractors and subcontractors at all sites;• The protection of members of the public possibly affected by its operations;• Compliance with all applicable Government Acts, regulations and standards; <p>These objectives will be achieved by:</p> <ul style="list-style-type: none">• Developing relevant HSE procedures and systems;• Developing health and safety targets in consultation with employees to promote, measure and continually improve health and safety performance;• Communicating, consulting and encouraging participation with employees and relevant parties;• Ensuring that incidents, hazards, near misses, concerns and complaints are reported adequately, investigated and steps taken to prevent recurrence;• Ensuring that all personnel are medically fit and capable of fulfilling their responsibilities at all time. <p>“SAFETY WILL TAKE PRECEDENCE IN ALL OPERATIONS”</p> <p>Similarly each employee has the responsibility to:</p> <ul style="list-style-type: none">• Protect their own safety and that of their fellow workers;• Follow all reasonable HSE instructions as directed by supervisors;• Comply with all Company and regulatory health and safety requirements;• Participate in the promotion and development of safe work practices and procedures. <p>Application of this policy resides with Beach Petroleum management and with all employees sharing responsibility for its implementation.</p> <p>Managing Director Signature</p>  <p>Operative from: 30/05/2006 Review by: 30/05/2008</p>	

HSE Management Plan



HSE POLICIES

ENVIRONMENTAL POLICY

Beach Petroleum is committed to conducting operations in an environmentally responsible manner. To fulfill these objectives the Company will:

- Avoid the pollution of land, water and air by conformance with regulatory guidelines and industry standards applicable to all areas of operation.
- Identify sites of archaeological, historical and natural significance, which could be impacted by the company's operations and minimise their disturbance;.
- Ensure that incidents, near misses, concerns and complaints are reported adequately, investigated and appropriate procedures implemented;
- Inform all employees and contractors of their environmental and cultural heritage responsibilities;
- Ensure that all operational sites have a waste management plan and that waste generated by operations is disposed of in a safe and environmentally efficient manner and in conformance with relevant environmental legislation;
- Distribute appropriate guidelines, regulations and publications;
- Protect native flora and fauna in all areas of operation;
- Develop and comply with codes of practice required by regulating authorities which minimise environmental impacts from all field operations.

Any personnel failing to comply with the requirements of this policy will be subject to disciplinary actions including assessment, or where necessary, dismissal, in accordance with Company procedures.

Application of this policy resides with Beach Petroleum management and with all employees sharing responsibility for its implementation.

Managing Director Signature

A stylized, handwritten signature in black ink, appearing to be 'J. Smith'.

Operative from: 30/05/2006

Review by: 30/05/2008



HSE Management Plan

8.3 ADA Drug & Alcohol Policy

ADA Policy

Australian Drilling Associates Pty Ltd



Drugs and Alcohol

Purpose

Australian Drilling Associates (ADA) is committed to providing a safe and healthy working environment for its employees, contractors and visitors. In order to meet its duty of care responsibilities, ADA will aim to ensure that all employees and contractors are "fit for work". It is therefore an ADA requirement that:

- All employees and contractors performing work for ADA must when engaged in work activities be "fit for work". This includes not being adversely affected by drugs or alcohol.
- All employees and contractors engaged in work for ADA will not manufacture, possess, sell, trade, distribute, dispense, and/or offer for sale any illegal drugs or intoxicants at any ADA workplace.
- All employees and contractors at ADA locations are required to be familiar with, and abide by, the Company's Drug and Alcohol Policy, and where applicable any specific drug and alcohol limits and testing programs and procedures.
- All visitors to ADA worksites shall be made aware that they are required to adhere to the Company's Drug and Alcohol Policy as a prerequisite for entry to these sites.
- When alcohol is consumed at a company sponsored meeting or social event or at a client or provider function individuals are expected to behave in a responsible manner.

Application

This Policy applies to all ADA employees, contractors and visitors.

Accountabilities

ADA Management Team members are accountable for the implementation of this Policy.

Managers and Supervisors are responsible for the day-to-day management of this Policy and all testing programs and procedures arising from this Policy as they apply to a specific worksite.

All employees are responsible for adhering to this Policy and associated Procedures and advising their manager if they are taking any medication, prescription or otherwise that has the potential to affect their ability to perform their work, or the safety and health of others so that appropriate precautions can be taken.



John Bell
Managing Director

Date 9-8-2007



HSE Management Plan

8.4 ADA Offshore Mini HSE Audit

Audit No.	Assessment/Audit Title	Assessor	Date	Assessor	Date
1.	Induction/Orientation Process				
2.	Permit to Work				
3.	Isolations Process				
4.	Confined Space Entry				
5.	Working At Heights				
6.	Mobile Equipment				
7.	Lifting Gear Management				
8.	Hoisting Equipment				
9.	Management of Change				
10.	Emergency Equipment				
11.	Emergency Response Drills				
12.	DROPS Program				
13.	Management of DG				
14.	Manual Handling				
15.	Manriding				
16.	Safety Devices				
17.	Occupational Health/Hygiene				
18.	Bulk hoses and fittings				
19.	Management of Explosives				
20.	Incident/Hazard Trend Analysis				
21.	Planned Maintenance Systems				
22.	Job Hazard Analysis				
23.	Safety Observation				
24.	Waste Management Facility				

HSE Management Plan

8.5 ADA HSEMS / BEACH HSE Policy & Diamond Offshore SMS & EMS Interface

Main HSEMS Reference Beyond 500m Exclusion Zone		Main HSEMS Reference Within 500m Exclusion Zone	
(PRIMARY) ADA / BEACH HSEMS Standard		Diamond Offshore SMS (per Ocean Patriot VSC) and GEMS Diamond Offshore EMS	
COMMIT		COMMIT	
#1	Leadership and Commitment	#1.0	POLICIES Occupational Health and Safety Policy; Environmental Policy; Alcohol and Drug Policy Environmental Policy
		EMS12.02	
#2	Organization, Accountability, Responsibility and Authority	#2.0	ORGANISATION AND RESPONSIBILITIES
		#2.1.1	Responsibilities
		#2.1.2	Job Descriptions
		#2.1.3	Health, Safety and Environmental Objectives
PLAN		PLAN	
#3	Planning, Objectives and Targets	#3.0	PLANNING AND IMPLEMENTATION
		#2.1.3	Health, Safety and Environmental Objectives
		#2.1.4	Annual Plans
#4	Legal requirements, Document Control and Information Management	#2.2.7	Consultation with Authorities
#7	Risk Assessment and Management	#3.1.1	Risk Objectives
		#3.1.2	Hazard Identification
		#3.1.3	Risk Assessment
		#3.1.4	Acceptance Criteria
#18	Environmental Effects, Assessment and Management	EMS12.03	Hazard Communication/COSHH
		EMS12.10	Environmental Aspects
DO		DO	
#5	Personnel, Competence, Training and Behaviours	#2.2.11	Safety Inductions
		#3.5.5	Emergency Response Training
			Exercise and Drills
		#3.5.6	Induction
		#3.5.7	Training Courses
		#3.7.7	EMPLOYEE SELECTION, COMPETENCE AND TRAINING
		#3.8	Personnel Administration
		#3.8.2	Personnel Recruitment and Selection
		#3.8.3	Competency
			Training of Personnel
		#3.8.5	Identifying Training Requirements
		#3.8.6	Survival Training
		#3.8.7	Safety Training
		#3.8.8	Responsibilities for the Training Program
		#3.8.9	Program
		#3.8.10	Induction Training Program
		#3.8.11	Training in Emergency Drills
		#3.8.12	Training Records
		#3.8.13	
#6	Communication, Consultation and Community Involvement	#2.2	Workforce Involvement: Co-operation & Communication
		#2.2.1	Weekly Safety Meetings
		#2.2.2	Pre-Tour Safety Meetings
		#2.2.3	Pre Task / TBM and JSA
		#2.2.4	Safety Training Observation Program (STOP)
		#2.2.5	Job Safety Analysis
		#2.2.6	Workforce Involvement in Policy Formulation and Writing Procedures

HSE Management Plan

		#2.2.8 #2.2.9 #2.2.12	Safety Alerts and Bulletins Safety Award Scheme Safety Representatives and Safety Committees
#7	Risk Assessment and Management	#3.1.1 #3.1.2 #3.1.3 #3.1.4 EMS12.03 EMS12.10 EMS12.11	Risk Objectives Hazard Identification Risk Assessment Acceptance Criteria Hazard Communication/COSHH Environmental Aspects Asbestos
#8	Incident Investigation and Reporting Management	#4.3 #4.3.1 #4.3.2 #4.3.3 EMS12.05	REACTIVE MONITORING Accident, Incident and Near Miss Reporting Accident and Incident Investigation Safety Statistics Environmental Incident Procedures and Reporting
#10	Operations and Maintenance	#3.2 #3.2.2	SAFE OPERATIONS PROCEDURES, SAFE WORKING PRACTICES AND SAFE SYSTEMS OF WORK. Safe Operations Procedures and Safe Working Practices (Company Safety Policies and Procedures Manual, Emergency Response Manual, Well Control Manual, Medical Procedures Manual, Well Operations Procedure Manual, Offshore Safe Working Practices Manual, Rig Operations / Operating Manual, Training & Development Manual, Personnel Policies and Procedures Manual, QMS, Global Excellence Management System (GEMS))
#11	Management of Change	#3.3 #3.3.2 #3.3.3	Management of Change Engineering Modifications and Change Control Planned Maintenance System (PMS)
#12	Facilities design, Construction and Commissioning	#3.3 #3.3.2 #3.3.3	Management of Change Engineering Modifications and Change Control Planned Maintenance System (PMS)
#13	Contractors, Suppliers, Partners and Visitors	#3.4 #3.4.2 #3.4.3 #3.4.4 #3.4.5 #3.4.6 #3.6 #3.6.1	PROCUREMENT Purchasing Goals and Objectives Inspection and Testing of Materials and Equipment Selection and Management of Suppliers, Vendors and Sub-Contractors Material Control of Lifting Equipment MODU Purchasing Services CONTRACTOR AND SUPPORT SERVICES MANAGEMENT Third Party Equipment Checklist
#14	Crisis and Emergency Management	#3.5 #3.5.2 #3.5.3 #3.5.4 #3.5.5 #3.5.6 #3.5.7 #3.5.8	EMERGENCY RESPONSE Emergency Response Organisation: Onshore Emergency Procedures Emergency Response Organisation: Offshore Emergency Response Training Exercise and Drills Induction Support Services and Outside

HSE Management Plan

		EMS 12.04	Organisations Pollution Prevention
#15	Plant and Equipment	#3.3.3	Maintenance System (PMS)
#16	Monitoring the Work Environment	EMS 12.04	Pollution Prevention
#17	Health and Fitness for Work	#3.7 #3.7.1 #3.7.2 #3.7.3 #3.7.4 #3.7.5 #3.7.6 #3.7.7 #3.7.8	OCCUPATIONAL HEALTH AND HYGIENE Health Monitoring Offshore Medical / Fitness Alcohol and Drug Policy Offshore Health and Hygiene PPE MSDS Training Courses Medical Procedures Manual
#18	Environmental Effects, Assessment and Management	EMS12.10	Environmental Aspects
#19	Product Stewardship, Conservation and Waste Management	EMS12.06 EMS12.07 EMS12.08 EMS12.09 EMS12.12	Waste Minimization Overboard Discharge Policy Sewage Discharge Policy Solid Waste Management Plan Waste Management
CHECK & REVIEW		CHECK & REVIEW	
#9	Performance Measurement	#3.2.1 #4.0 #4.2 #4.3 #4.3.1 #4.3.2 #4.3.3	Document Control PERFORMANCE MEASUREMENT ACTIVE MONITORING REACTIVE MONITORING Accident, Incident and Near Miss Reporting Accident and Incident Investigation Safety Statistics
#20	Audit Assessment and Review	#5.0 #5.2 #5.3 #5.4 #5.5 #5.6 #5.7 #5.8 #5.9 #5.10 #5.11	AUDIT AND REVIEW AUDIT OBJECTIVES AUDIT RESPONSIBILITIES AUDIT SCOPE AUDIT PLANNING AND SCHEDULE AUDIT IMPLEMENTATION AUDIT PROCEDURE AUDIT TRAINING CORRECTIVE ACTIONS REVIEW PERFORMANCE STANDARDS



8.6 Relationship Table – of Beach T/38-P Spikey Beach-1 Drilling Program HSE MP to ADA HSE MS Standards

The following table outlines for the respective ADA HSE MS standard, the link with Beach T/38-P Spikey Beach-1 HSE MP – Semi-submersible drilling and how drilling will meet the expectation of the respective Beach Petroleum expectations.

ADA HSE MS Std	Title	Beach T/38-P Spikey Beach-1 Drilling Program HSE MP Reference (include and not limited to)	Comment: reflects what the expectation is and how drilling activities will be managed to comply with intent of the ADA HSE MS Standards.
1	Leadership & Commitment	1.2, 2.1, 2.2	<p>Signed ADA HS&E Policy by the Senior management, which will be made available to all related personnel and interested parties throughout the project, is a statement of commitment that Health, Safety and the Environment is equally important to other business aims, There is an expectation that all those involved in the Beach T/38-P Spikey Beach-1 well drilling program will abide by this policy. – A copy of this policy is attached to this document. In addition a copy of the ADA Drug and Alcohol Policy is also attached, will be made available to all personnel and interested parties.</p> <p>There is the expectation a work place environment will exist reflective of a proactive behaviour safety based culture. This environment will be supported by all levels and demonstrated/reinforced by senior management at all times.</p> <p>Leadership and proactive commitment to HSE will be further demonstrated by all managers and supervisors through the following elements and will not be limited to:</p> <ul style="list-style-type: none"> • Attending at and chairing HSE meetings; • Receiving and action on HSE reports; • Promoting and communicating HSE topics in company meetings and in company publications; • Conducting HSE audits or inspections personally including STOP Reporting process; • Emphasising plans for achieving HSE objectives including toolbox talks and JSA; • Participating in the execution of HSE plans and incident management; • Holding HSE review and analysis sessions;



2	Organization, Responsibility and Authority	1.5, 2.2,3.1.2, 4.0	<p>An important HSE aspect of the well drilling program will be the management of third parties / service providers. Diamond, as lead rig contractor, prefers to integrate these parties into the Diamond safety management systems to which ADA is in agreement. Diamond will therefore be responsible for:</p> <ul style="list-style-type: none"> • Safety while operating the Spikey Beach-1 drilling program & other activities and demonstrate commitment to good HSE performance. • Interfacing with construction & service contractors on board the Ocean Patriot to ensure that the HS&E objectives are achieved • Completing the well drilling program with a target of zero accidents / incidents, injuries or environmental damage. <p>While the Ocean Patriot OIM is ultimately accountable, it will be the responsibility of the respective contractor's line management to ensure their personnel are competent to perform their services, meet the required competency standards, and adhere to the Diamond HSE Policy and Emergency Response Plan while on board the Ocean Patriot.</p> <p>The organization chart showing the reporting structure between all personnel will be provided in the Beach T/38-P Spikey Beach-1 Vessel Safety Case Revision. The HSE elements of each position in an organisation (role/duty, responsibility and accountability and reporting relationship) will be clearly defined in writing and issued individually.</p> <p>The communication of information onboard the Ocean Patriot is the responsibility of the OIM who shall communicate directly to any personnel on board with respect to vessel management or health, safety and the environment.</p> <p>All related personnel will be made aware of their individual HSE role, responsibilities and accountabilities and be given necessary authority commensurate with individual levels of responsibility.</p> <ul style="list-style-type: none"> • EMAS Offshore vessel masters will be responsible for their vessel and the safety of all on board. They will have HSE MS and appropriate procedures including transfer of materials. • The Bristow Helicopters Australia will be responsible for their activities and have in place the necessary management system to ensure a safe operation. <p>The HSE MS of service providers will be subject to Audit.</p> <p>The interface between the Diamond rig and the various service providers will be closely managed via procedures and communication protocol, including: induction, JSA, permit to work etc.</p> <p>ADA maintains a strict policy on the possession, use and consumption of alcohol and substance abuse. – It will be an individual's responsibility to ensure they are "fit for Work".</p> <p>A copy of the ADA Drug And Alcohol Policy which is attached to this Beach T/38-P Spikey Beach-1 well drilling program HSE</p>
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			<p>MP, will be made available to all related personnel.</p> <p>It will be intended that a more rigorous approach to drugs and alcohol than outlined in the policy will be followed during this well drilling program. In the event of any person reporting to the heliport who is suspected to be under the influence of narcotics or alcohol will not be permitted to travel offshore until proven clear. In the event of proving them to be under the influence they will not be permitted to return for the duration of the well drilling program.</p>
3	Planning, Objectives and Targets.	1.4, 1.5	<p>The HSE objectives will assist in reducing health and safety risk and adverse impact on the environment to as low as reasonably practical (ALARP) and ensure that no serious injury or environmental damage occurs.</p> <p>The tools which will be used to achieve the objectives include, Risk Management, Hazardous substance inventories control (Material Safety Data Sheets review), Permit to work system, JSA, STOP Reporting process in addition to a suite of tested and proven procedures.</p> <p>Set HSE KPI's which will include the HSE leading and lagging indicator tracking will be closely monitored periodically.</p>
4	Legislative Compliance	2.1, 8.0	<p>It will be the responsibility of all those associated with the Beach T/38-P Spikey Beach-1 drilling operations and the accountability of line and senior managers to comply with the following legislations and to obtain the regulatory approvals and will not be limited to:</p> <ul style="list-style-type: none"> • Offshore Petroleum and Greenhouse Gas Storage Act 2006, Part 4.7 and Schedule 3 Occupational Health and Safety; • Commonwealth P(SL)A 1967, Schedule 7 Occupational Health and Safety; • P(SL)A (Occupational Health and Safety) Regulations 1993; • P(SL)A (Management of Environment) regulations 1999 and • P(SL) (Management of safety on Offshore Facilities) Regulations 1996 • Environment Protection and Biodiversity Conservation Act 1999 and its Regulations 2000 <p>The ADA HSE Team Leader and ADA HSE Coordinator will be responsible for development, implementation and control of a system (HSE legal register) which enables tracking of HSE compliance including update and communication of new legislation revision.</p>
5	Training, Awareness and Competence	6.0	<p>All personnel travelling offshore:</p> <ul style="list-style-type: none"> • Will hold current BOSIET (incl HUET) certificates from an acceptable training provider. • Will have an Offshore Medical Certificate. (UKOOA) <p>Diamond has a structured training/development program that covers safety management. This will ensures all personnel at site are competent to participate in the Permit-to-Work process, and are aware of their specific Well Control and Emergency Response responsibilities. This training also includes Bill station locations and information.</p> <p>All Marine Union personnel (Deck Officers, Engineers, and Seaman) will be required to hold a current Australian Maritime Safety</p>



			<p>Authority (AMSA) certificate of competency for that position. In addition, they will hold a current AMSA medical certificate.</p> <p>All aircrew will hold current CASA certifications and hold a current CASA medical certificate. The ADA drilling supervisors hold current Well Control certificates and will be trained in the requirements of the Beach T/38-P Spikey Beach-1 drilling operations Emergency Response Plan.</p> <p>Training matrix and training needs analysis will be made available and utilized for a proper and structured training strategy.</p> <ul style="list-style-type: none"> • All employee competency and training qualifications, for all ADA and third party contractors / service providers going offshore, will be held on file by their respective companies. • All personnel travelling to the Ocean Patriot, will undergo pre start induction at the well site upon arrival, and will be communicated on the operational, safety responsibilities and the incident reporting and management structure surrounding the positions of all personnel – attendance is mandatory. • All personnel handling explosives and radio materials will have appropriate training and certificates.
6	Communication and consultation	2.2,	<p>Communication of relevant HSE matters will be discussed on a daily basis through the mechanism of the morning meeting held between the rig and shore base office staff and on a more focused basis at regular offshore and onshore safety meetings.</p> <p>The tool box, job start, HAZID sessions, JSA's will all be part of the integrated communication process.</p> <p>There will be a defined communication protocol for the off loading of supplies and materials. These activities will be conducted under the permit to work system.</p>
7	Hazard and Risk Management	2.3, 2.4	<p>Project-specific hazards have been identified using a HAZID Workshop process and development of a Drilling Risk Register. The register will be maintained as a live document and reviewed on a monthly basis. Measures will be identified to reduce the potential risk to ALARP.</p> <p>A Job Safety Analysis (JSA) process will be utilised for each new, unusual, or critical job and acts as a check to minimise risk associated with those tasks. The Ocean Patriot JSA register will be maintained and used for the safety planning of routine and non-routine tasks with the JSA's then attached to a Permit to Work, as required.</p> <p>In addition, Diamond will utilise the STOP Reporting process to help prevent, or eliminate injuries by addressing unsafe acts/conditions before an injury occurs.</p> <p>There will be a Hazardous Substances Inventories system. This applies to explosives, drilling mud additives; cementing additives etc. only certified people will handle such products.</p>
8	Incident Management	5.0, 8.4	<p>All companies associated with the Beach T/38-P Spikey Beach-1 drilling operations will promote and encourage reporting including reporting of all near misses, incidents and accidents, however minor. An incident/accident investigation will be conducted as soon as possible after the occurrence to the level appropriate to the severity.</p>



			<p>The results of any near miss, incident/accident investigation will be reviewed at pre-tour or toolbox meetings and weekly safety meetings.</p> <p>The Bristow Helicopters Australia will be responsible for Civil Aviation Safety Authority (CASA) reporting requirements.</p> <p>Diamond and dedicated EMAS Offshore vessel company (Lewek Swift and Lewek Emerald) will be responsible for Australian Maritime Safety Authority (AMSA) reporting requirements.</p> <p>The ADA Incident Management Procedure will be adopted.</p>
9	Performance Measurement and Reporting	7.0	<p>Drilling will adopt the Beach T/38-P Spikey Beach-1 drilling operations HSE KPI's.</p> <p>All companies contracted to ADA will submit monthly personnel hours worked, and injury reports upon request to the ADA Team Leader prior to the 5th of the following month.</p> <p>Responsibility for hours worked and injury reporting to NOPSA, lies with the Diamond Offshore HSE & QA Manager.</p> <p>The ADA HSE Performance Measurement and Reporting protocol will be adopted.</p>
10	Operational Control	2.1, 2.2, 2.3, 2.4, 2.5, 2.6	<p>Detailed drilling programs will be developed which reflect the principles laid out in the Offshore Operations Manual. On a day to day basis detailed procedures will be drawn up by the Drilling Supervisor to dictate step by step instructions to the rig personnel.</p> <p>Further, the tool and process used to support operational control will include the permit to work, JSA, risk assessment, tool box meetings etc.</p>
11	Changes and modifications	2.3, 2.4, 2.5	<p>Scope changes will be captured following ADA's Change Control Procedure and will be maintained in the Management of Change Register.</p>
12	Design and Construction	2.3, 2.4, 2.5	<p>The Outline Drilling and Completions & Testing programmes will be subject to peer review to validate the design process. The detailed programmes will be drawn on the risk register to ensure offshore personnel are fully aware of operational risks. After Action reviews will be conducted at the end of each drilling phase to ensure learnings will be captured and incorporated into the next phase.</p>
13	Contractors, Suppliers and visitors.	3.1.3	<p>Specific HSE requirements will be captured in the drilling services contracts. All companies contracted to ADA will submit monthly personnel hours worked, and injury reports upon request to the ADA HSE Team Leader and ADA HSE Coordinator prior to the 5th of the following month.</p> <p>HSE inductions will be conducted by the Diamond HSE rep for any new visitors to the rig.</p> <p>HSE requirements, in addition to other matters will be discussed in a "kick Off" meeting. A kick off meeting will be held with each service provided</p>



14	Emergency Preparedness	4.0, 4.1, 4.2	<p>While the operational focus is on a strong behaviour safety based culture and prevention of incidents, a high level of Emergency Preparedness will be maintained should an unplanned event occur.</p> <p>The Beach T/38-P Spikey Beach-1 drilling operations Vessel Safety Case Revision cover in detail the reporting and escalation process to be adopted. The document will also include the incident management system for incidents involving workboats in transit from Toll Logistics shore base in Geelong Port to rig & helicopter in transit.</p> <p>On the Ocean Patriot there will be defined emergency alarm signals, toxic gas alarms, fire and emergency duties, life boat duties and muster points. This information will be displayed on all Ocean Patriot station bills. Diamond procedures define the frequency of regular emergency exercises.</p> <p>Rig Evacuation – Should the need arise to carry out an evacuation of the Ocean Patriot, the Diamond evacuation procedure will be adopted.</p> <p>The helicopter provider will maintain aircraft, support equipment, and air crews on 24hr basis during the drilling program.</p> <p>A supply vessel /stand by vessel will be within the 500m zone and maintain radio contact with the Ocean Patriot at all times, throughout the well drilling program.</p>
15	Plant and Equipment	2.3, 2.4, 2.5, 2.6	<p>Addressed in the Ocean Patriot Vessel Safety Case submission and an independent rig inspection.</p> <p>All service providers will be contractually obligated to maintain the equipment in a “fit for purpose and operational sound” manner.</p>
16	Monitoring the Working Environment	7.2, 7.0	<p>Safe Work Practices will be an important area of focus. Two main processes will be used to achieve this are “permit to work” and the JSA process, in addition to tool box and job start meetings.</p> <p>Service Companies will adopt the Diamond Permit to Work System when on board the Ocean Patriot</p> <p>Adequate PPE will be provided for all Offshore personnel. All ADA and ADA third party contractors / service provider personnel will undergo the Ocean Patriot pre-start induction training. This will include, emergency response, work permit requirement, incident reporting etc.</p> <p>The STOP Reporting process will be used to reinforce positive HSE behaviour and draws attention to at risk behaviour.</p>
17	Health and fitness for work	3.0, 3.1, 3.2	<p>Diamond personnel will receive a medical pre-employment assessment and will be medically fit for their respective roles on the Ocean Patriot prior to mobilisation.</p> <p>Diamond will maintain medical records of all Diamond employees and third party contractors.</p> <p>ADA and ADA Third Party Contractor / Service Provider personnel will have a medical assessment prior to working offshore.</p>



			<p>Diamond will maintain a qualified Medic on board for the duration of the well drilling program.</p> <p>The Medic shall provide medical services to all offshore employees involved in the drilling operations and will consult with and request assistance from a shore-based medical practitioner when non-routine medical or health conditions are diagnosed.</p>
18	Environmental Effects.	8.0	<p>All activities and data relating to Environmental Management which are detailed in the originally approved Bass Basin Drilling Program Environment Plan for Spikey Beach-1 drilling operations, which remains valid.</p> <p>The masters of EMAS Offshore Shipping supply vessels (Lewek Swift and Lewek Emerald) will not knowingly interfere with the activities of whales, dolphins, and seals.</p>
19	Conservation and waste Management	8.0	<p>All activities and data relating to Environmental Management which are detailed in the originally approved Bass Basin Drilling Program Environment Plan for Spikey Beach-1 drilling operations, which remains valid.</p> <p>Systems and process will be in place to minimise any adverse impact on the environment. Oil use log book will be maintained.</p> <p>Waste management including waste disposals from the rig via the vessels to shore base shall be dealt with in accordance the required EPA regulations and other applicable regulations.</p> <p>All hard waste will be collected on board and will be returned to shore via the Geelong Port.</p>
20	Reviews, Audits and Inspections.	7.0	<p>To demonstrate that Health, Safety and Environmental Management of the Beach T/38-P Spikey Beach-1 drilling program is within positive approach, an audit schedule will be developed.</p> <p>Findings will be reported back to the Ocean Patriot Rig Manager, ADA Drilling Superintendent and ADA Drilling Manager. Non-conformance identified by these audits, will be managed through the corrective action system.</p> <p>An audit of the AS332L Super Puma of Bristow Helicopters will be conducted prior to the operational start date.</p> <p>All offshore personnel will adopt the STOP Reporting process for the day to day hazard identification. The object of STOP Reporting process will be to prevent, or eliminate injuries by correcting/challenging unsafe acts, inappropriate safety behaviour and unsafe conditions as they occur and before they result in an incident</p> <p>At an operational level, activities will be reviewed at the daily meeting. Important HSE tracking elements include manhours, incident details (LTI, Medical Treatment case, First Aid, Spill, Property Damage & Near Miss), training / drills held, audits held, environmental inspection held and other proactive safety efforts.</p>