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1 PURPOSE

Modus has deemed it critical to bring to your attention the current project and mobilisation findings and subsequent safety and operability impacts to date, for your immediate attention and correction.

Modus has implemented their Stop Work Authority regards working on the vessel and any associated tasks for vessel infrastructure and integration.

The below findings, acceptance criteria and recommendations are listed for immediate response within 24 hours from receipt of this document. Please note, in the event of an unsatisfactory response, Modus shall have to escalate this report.

2 FINDINGS & ACCEPTANCE CRITERIA

2.1 MOBILISATION ORGANISATION & CONTROL

- Lack of coordination and communication for Modus scope and activities, follow up and delivery.
- Modus require a competent third-party mobilisation manager to be appointed to oversee the remainder of the mobilisation and ensure health and safety is of the highest standard.

2.2 MEZZANINE DECK INTEGRITY & WORKMANSHIP

- Modus are concerned about the structural integrity of the mezzanine deck that has been fabricated and installed for this project scope.
- Heavy equipment has been placed on the mezzanine deck prior to any NPI being carried out, and prior to work being completed, whilst contractors continue to work beneath.
- There is no clarity on the materials that have been used to construct the mezzanine deck.
- Modus request Fadfae to provide the following in relation to the mezzanine deck:
 - NDT report for materials used.
 - Design and subsequent calculations used for mezzanine deck, including tolerance for offshore dynamic working.
 - Management of Change (MoC) documentation for any changes made to the mezzanine deck since inception.
- The above must be inspected and signed-off by a competent third-party structural integrity engineer that is approved by Shell. The final report that is generated must be shared with Modus.

2.3 WELDING INTEGRITY & WORKMANSHIP

- Modus have witnessed welding performed well below standard and we are concerned that as soon as the vessel departs and the mezzanine deck is put under strain in a dynamic environment, these welds will crack.
- Modus require an immediate inspection of the current welds by a competent welding inspector who is approved by Shell.
- A report will be generated, and a recommended action plan will be produced. Modus request that this is shared.
- Modus require Fadfae to complete the recommended actions to rectify the incorrect welding and then organise a re-inspection by the same competent Welding Inspector that has been pre-approved by Shell. The final report must then be shared with Modus.

2.4 ELECTRICAL CONFORMITY

- Modus have witnessed below standard electrical work on multiple occasions throughout the mobilisation. This has been brought to the attention of management within Fadfae, who have worked to rectify some of the issues.
- However, there is one significant electrical issue that is outstanding. While demobbing the Fadfae-supplied control container, the main 440v 64Amp connector was supplied with the incorrect gender. The gender supplied was female, making the supply connector a male plug. As the supply connector was unplugged, the plug pins had live 440v on them; fingers or metallic items could have easily come into contact with the pins, causing severe harm or even death.
- Modus require a complete electrical inspection by a competent electrician that is approved by Shell.
- Modus require an action plan to rectify all of the electrical issues and a timeline for completion.
- Once all of the electrical issues have been resolved, Modus require a re-inspection from the same competent electrician and a report to be produced and shared with Modus that has full sign-off on all electrical components.

2.5 EQUIPMENT SETUP & MOBILISATION

- Modus have observed the LARS reaching extreme temperatures due to unavailability of cooling water.
- Not only does this pose a potential burn risk, but continuing to subject the LARS to this temperature can lead to equipment breakdown that is critical to offshore operations.
- Modus recommend that the correct hoses and equipment are supplied to the LARS operators to ensure that cooling water is made available immediately.
- Additionally, linked to section 2.2, Modus recommend that the LARS is removed from the mezzanine deck until subsequent rectification work has been completed and signed off regarding structural integrity of the mezzanine deck.

2.6 DECK LAYOUT

- Modus originally provided a deck layout diagram based on the previous vessel, the Ella Conqueror. Modus requested updated DWG file to produce an accurate deck layout for the current vessel, the Vega Bless. Fadfae advised that the old deck layout is sufficient as the vessel is the same size.
- Modus requires Fadfae to confirm that the Vega Bless is the same size as the Ella Conqueror. If there is a difference in dimensions, Modus require access to the updated deck layout and calculations that have been completed.
- If there have been changes to equipment orientation and mezzanine deck size, please provide an updated vessel stability calculation and a confirmation of acceptance from the vessel owner/captain.

2.7 OUTSTANDING FREE ISSUE ITEMS & DOCUMENTATION

- Modus have provided a list of free issue items for Fadfae to source several months in advance of mobilisation. There are still multiple items outstanding that have not been provided. When Modus have requested an update, Fadfae advise that these items are available and will be obtained within the next days, but then never arrive.
- Modus require clear and honest communication regarding these items. If Fadfae cannot produce certain items, please highlight at the earliest opportunity so that Modus can look into alternative solutions.

- Additionally, Modus have requested updated documentation that has not yet been shared such as:
 - HSE Plan with Modus comments incorporated.
 - Updated Project Execution Plan.
 - Updated Mobilisation Plan.
- Modus require this documentation to be shared immediately for review and acceptance.

2.8 SAFETY REPORTING & PERFORMANCE

- Modus offshore crew have witnessed mobilisation personnel requiring treatment for injuries such as burns and falls. During the cadence meeting with Shell it was reported that there had been no injuries and no loss time incidents on site.
- Modus requires that Fadfae accurately report all accidents, incidents and near misses. Modus would also require that investigations, findings and control measures for prevention are shared.

2.9 CREW CHANGES

- Due to the delay in project mobilisation, Modus are having to implement a partial crew change prior to operations.
- As a direct result of the mobilisation delays, Modus crewing has been negatively affected as crew have already worked 4-6 weeks prior to operations commencing. Subsequently, this means that another crew change whilst in field is likely.
- Modus require written confirmation that a crew change whilst in field is acceptable to Shell and will be accommodated.
- Modus also require confirmation that personnel could be mobilised from a different ports if required such as Cotonou, Benin or Libreville, Gabon.
- Modus crew change will require technical handover; therefore, the crew change must be at least 1 day. Modus require confirmation that the 1-day crew change will be acceptable and that there will be enough cabin space to accommodate this.

3 RECOMMENDATIONS

Modus recommend that Fadfae implement a Stop Work Authority for current mobilisation activities on the vessel, in order to evaluate and inspect current status to ensure quality assurance, safety and technical conformity is in place in line with accepted standards such as DNV and IMCA.

Modus recommend that Fadfae share and coordinate with the end client Shell, to ensure integration and cooperation on site verification is performed in accordance with accepted oil and gas standards such as DNV and IMCA.

Modus require Fadfae to provide an accurate timeline for all rectification work as detailed throughout this report. The timeline that is provided must be an honest assessment of the expected duration that it will take to resolve all of the issues, as this information will be used to plan the remaining integration scope that is required on the vessel. The timeline will also inform crew change dates as detailed in section 2.9 above.



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