

**Equinor Energy AS**  
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4035 Stavanger

Our case officer

[REDACTED]  
Date  
12 May 2026

Your ref.  
2025-025497

Our ref. (please quote when replying)  
Havtil 2025/1512/AG

## **Order and revised report following the investigation of a well control incident in well Q-21 on the Troll field involving Deepsea Bollsta**

On 23 September 2025, a well control incident occurred during the permanent plugging and abandonment (PP&A) of well 31/3-Q-21 BY1H T5 \BY2H T2 on the Troll field, when using the Deepsea Bollsta facility. The incident occurred during the cutting of a 13 3/8" casing at 510 m RKB, 160 m below the seabed, and resulted in large volumes of water and gas gushing to the surface. Equinor estimates that approximately 930 kg of gas, a mixture of methane, ethane and propane, was released at the surface. In Havtil's assessment, the incident had the potential to become a major accident.

We investigated the incident between 25 September 2025 and 22 April 2026. Our investigation report is attached. We have identified serious regulatory breaches; see Chapter 8 of the report.

Well Q-21 was classified by Equinor as an orange well, meaning a well that lacks a tested and verified barrier bow tie (see non-conformity 8.1.1). Equinor's planning organisation was aware of the risk of gas behind the casing. Despite the fact that acoustic impedance wireline logging was not qualified for identifying gas behind the casing, the method was planned for and used (see non-conformity 8.1.3).

In Equinor's risk analysis process, which formed the basis for the planning, the risk of gas behind the casing was not adequately quantified, and uncertainties related to indirect gas measurement were not identified. In light of this, the need for an annular swivel and a closed annular BOP was disregarded (see non-conformity 8.1.4).

During the calibration process, Equinor approved acoustic impedance measurements that fell outside the quality range (see non-conformity 8.1.2).

In practice, the cutting operation on Deepsea Bollsta was carried out without barriers in place (see non-conformity 8.1.5). Equinor had not ensured that the necessary information regarding the barrier status of the well was communicated to the relevant users in connection with the planning and execution of the cutting operation (see non-conformity 8.1.7).

The scope and severity of the non-conformities have revealed a need to verify whether the elements of Equinor's management system for planning and executing well workovers and permanent plugging operations are functioning as intended.

Notification of the order was made in a letter of 22 April 2026, with a deadline for submitting comments of 7 May 2026.

The decision to issue the order is in accordance with the notification.

*Pursuant to the Framework Regulations, section 69 concerning administrative decisions, with reference to the Management Regulations, section 21 concerning follow-up, we order Equinor to:*

- 1. Review and identify deficiencies and weaknesses in Equinor's requirements for risk management and follow-up in the planning and execution of workover and permanent plugging operations (DW200 – Workover and PP&A offshore), based on the incident of 23 September 2025.*

*The review shall include, but not be limited to,*

- control mechanisms such as risk analyses, verifications, and signing and escalation matrices*
- use of new technology/methods*

- 2. Identify measures to address the deficiencies and weaknesses identified following the review in section 1. A time-delimited and binding schedule for implementing the measures shall be drawn up.*

- 3. An overview of the deficiencies and weaknesses identified by the review (section 1), the identified measures, and schedule for implementation (section 2) shall be submitted to Havtil.*


*The deadline for complying with the order is 17 September 2026. We are to be notified when the order has been carried out.*


The decision may be appealed pursuant to the Public Administration Act, section 28. The appeal deadline is three weeks from receipt of this letter. The Ministry of Energy is the appeal body, but any appeal must be sent to us.

The investigation report includes a description of identified non-conformities, and we request that you provide an account of how these non-conformities will be addressed by 26 May 2026.

Further information about the right of appeal and the applicable procedure can be obtained from us. The employees' representatives, including the safety representatives, shall be informed of the decision and the report, with reference to the Working Environment Act, section 18-6, eighth paragraph. The decision and report will be published on [www.havtil.no](http://www.havtil.no).

Sincerely

  
*Head of Supervision*

  
*Investigation leader*

*This letter has been electronically certified by the Norwegian Ocean Industry Authority and therefore has no signature.*

Attachments: 2