

ENVIRONMENTAL IMPROVEMENT NOTICE

To: Woodside Energy Limited

In conducting a petroleum environmental inspection at the regulated business premises to monitor compliance with petroleum environmental law in relation to the Nganhurra Operations Cessation petroleum activity, I, [REDACTED], a NOPSEMA inspector appointed under section 602 of the Act, am satisfied on reasonable grounds that the titleholder named above is contravening:

(a) regulation 7 of the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (the Environment Regulations)

1. The reasons for my opinion are:
 - 1.1. The findings from the inspection I conducted in relation to the offshore petroleum premises of the titleholder, provided me with reasonable grounds to believe that the activity has not been undertaken in accordance with the accepted Nganhurra Operations Cessation Environment Plan (EP).
 - 1.2. Specifically, Woodside has failed and continues to fail to preserve the condition of the riser turret mooring (RTM) and remove the RTM for onshore disposal.
 - 1.3. The 20 year design life cannot be relied on as not all required inspections and testing have been completed to verify the design condition. For example, the planned 10 year internal riser compartment inspection was not performed whilst the FPSO was on location and connected to the RTM.
 - 1.4. The RTM has already degraded in at least two areas, namely flooding of compartment two and the failure of several ballast valves. The degradation of both these areas demonstrates that the condition of the RTM is not being maintained.
 - 1.5. Woodside has not demonstrated that it cannot remove the RTM from the title area or repair it and tow it for disposal on land.
 2. As a result of this contravention I am satisfied on reasonable grounds that there is, or may be, the following significant threat to the environment:
 - 2.1. The RTM may become a navigation collision hazard if it sinks as it then may cause a significant threat to other marine users including damaging vessels; and
 - 2.2. A vessel could collide with the RTM, resulting in a loss of hydrocarbon containment from vessel fuel or storage tanks; and
 - 2.3. The resulting loss of hydrocarbons could expose multiple environmental values and sensitivities to concentrations of hydrocarbons that may have a widespread and long term impact.
 3. The environment that is subject to the threat is:
 - Matters protected under Part 3 of the Environmental Protection and Biodiversity Conservation Act 1999, including the Ningaloo Coast world heritage area, Commonwealth marine areas, listed threatened species and listed migratory species as described in Section 4 of the EP.
 - Socio - economic and cultural features of the environment as described in Section 4.6 of the EP
 4. The titleholder is required to take action within 90 days of the date of this notice to remove the threat.
 5. The following action must be taken by the titleholder within the period specified above:
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- 5.1. Make arrangements so that the RTM can be removed and disposed onshore as soon as reasonably practicable; and
- 5.2. Implement systems to inspect, maintain and repair the RTM to ensure it does not sink unexpectedly and present a collision risk to other marine users. Assurance should include, but not be limited to, undertaking inspections and engineering analysis such as: determining whether the internal bulkheads and any water-tight seals or gaskets, for example compartment manholes, of the RTM have been inspected and maintained within the design specifications.

Or, comply with regulation 7 of the environment regulations by any other suitable means to remove the threat.




NOPSEMA Inspector
wA275140

23 October 2019

NOTES: (Please see the last page of this notice)

When the required improvement has been completed, the NOPSEMA Inspector requires Woodside Energy Ltd to submit the completed part of the notice under Clause 8, to the contact details below:

Name: 

Position: Inspector

Address: Send in electronic format via email to:
submissions@nopsema.gov.au

Telephone number: +61 8 6188 8700

By signing below, I confirm on behalf of Woodside Energy Ltd that the specified action described in Improvement Notice No. 775 has been undertaken within the period specified.

Signed: _____ Date: _____

NOTES:

1. A person who fails to ensure that this notice is complied with, to the extent that it relates to a matter over which the person has control, may be liable to a penalty of 300 penalty units or a civil penalty of 400 units (Schedule 2A, Clause 11D of the Act).
2. This notice must be displayed in a prominent place at the premises and, must not be tampered with or removed before the notice has ceased to have effect. (Schedule 2A, Clauses 11D and 12 of the Act)
3. The notice may be issued to the titleholder by being given to the titleholder's representative at the premises who is nominated for the inspection. (Schedule 2A, Clause 11C of the Act)
4. As soon as practicable after issuing the notice, the NOPSEMA inspector will take reasonable steps to give a copy of the notice to, where applicable (Schedule 2A, Clause 11D of the Act):
 - (a) the operator's representative at the facility if the premises are a facility, and
 - (b) the vessel master if the premises are a vessel under the command or charge of a master, and
 - (c) the owner, if the premises are owned by a person other than the titleholder or operator.
5. An improvement notice ceases to have effect when the responsible person takes the action specified in the notice.
6. NOPSEMA must publish on its website an environmental improvement notice within 21 days after the notice is issued, unless NOPSEMA is aware that the decision to issue the notice is the subject of an application for review by a court. (Schedule 2A, Clause 12A of the Act)
7. For the purposes of submitting the completed part of the notice under Clause 8, the titleholder's representative is the person to whom this notice was given.