

From: [REDACTED]
Sent: Tue, 3 Jun 2025 10:56:03 +0000
To: [REDACTED]
Subject: RE: Report - DRAFT - Investigation IVT14016 - Minerva Decommissioning Plastic Saddles Lost to the Marine Environment (A1209024) [SEC=OFFICIAL]
Attachments: NOPSEMA Engagement on Minerva Activities in Commonwealth Waters April 2025.pdf, 28 February saddle loss communications.pdf, 4 March First saddle loss during cutting.pdf

Hi [REDACTED]

Thank you for the draft investigation report. Please find below comments on conclusion 3.

3. Non-compliance with the Minerva Decommissioning and Field Management EP

Conclusion: NOPSEMA Inspectors conclude that Woodside is currently in compliance with the EP, however there was opportunity for the incident to be reported to NOPSEMA earlier and for Woodside to investigate and potentially mitigate the release earlier than was actioned.

In accordance with Section 9.10.5.2 of the EP, Woodside is to report any recordable environmental incidents (as defined in regulation 5 of the Environment Regulations) to NOPSEMA as soon as practicable after the end of the calendar month in which it occurs and in any case not later than 15 days after the end of the calendar month.

Reasons for conclusion

Woodside recorded the saddles lost to the marine environment as a breach of performance standard PS 9.2 of the EP, however, the decision-making process for this and whether there was appropriate consideration given to a potential breach associated with unplanned aspects of the activity was not clear to NOPSEMA Inspectors.

Woodside presented the attached powerpoint to NOPSEMA on the 10 April. In this meeting Woodside talked through the decision-making process for recording the saddles under PS9.2 (see slide 15) and requested feedback from NOPSEMA on the most appropriate performance standard prior to submitting the monthly recordable. Performance Standard 9.2 under 'planned' risks in the EP was chosen given Section 7.6 of the EP covers risks from floating marine debris and potential plastic discharge from decommissioning activities (Table 7-18). Performance Standard 13.3 under 'unplanned' risks in the EP was not chosen as it relates to waste lost overboard from the vessel, this performance standard is primarily focussed on impacts from accidental loss of waste from the vessel and impacts to the seabed from dropped objects.

It is unknown whether recording the incident against an unplanned aspect performance standard would have resulted in Woodside:

1. Taking action to investigate and mitigate the incident earlier
2. Notifying NOPSEMA of the event earlier.

Recording the incident against 'unplanned' performance standard 13.3 would not have affected the action taken. It was not until March when pipeline cutting and recovery works commenced and when cumulative saddle losses meet the requirements of a recordable incident, as outlined in the EP. Whether the incident was a breach of 'planned' or 'unplanned' risks as outlined in the EP, the incident would have still been a recordable and subject to the same notification requirements (as outlined in Section 9.10.5.2 of the EP).

Subsea 7's initial incident summary notice raised the potential heightened risk of saddles being lost during the pipeline cutting stage, however it does not appear that any action was taken by Woodside to investigate or assess the potential risk of clamps lost to the marine environment based on Subsea 7's conclusion.

Woodside has worked collaboratively with Subsea 7, since the initial saddle fragment was noted on the 12 January during pipeline deburial works in Commonwealth Waters. This included investigating what actions could be taken to reduce the risk of further saddle losses ahead of cutting and recovery of the Minerva pipeline, which commenced on the 4 March 2025. Cutting and recovery activities in Commonwealth Waters occurred for a total of 6 days over the campaign.

Actions taken by Woodside in the period from the 12 January to the 4 March:

- Internal risk review of 12 January saddle loss, with findings and incident summary notices entered into Woodside's First Priority system. The 12 January saddle fragment event was found not to meet the requirements of a recordable incident under the EP.
- Dedicated meetings on the saddles occurred between Woodside and Subsea7 on the 30 January and 17 March to assess and mitigate the risk of further saddle fragments being lost to the marine environment during deburial and cutting works.
- Saddles were a standard agenda item at fortnightly Woodside/Subsea7 HSE meetings (17 January, 14 February, 28 February, 7 March, 28 March, 4 April, 11 April)
- The ongoing collaboration with Subsea7 to mitigate the potential heightened risk of saddles being lost in the lead up to pipeline cutting is evident in the attached Subsea7 saddle notification reports (28 February and 4 March)

Regards,



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I acknowledge the Whadjuk Noongar people as the traditional custodians of the land on which I choose to live and work.

Creating a safe and inclusive working environment is everyone's responsibility.

From: [REDACTED]@nopsema.gov.au>
Sent: Tuesday, May 27, 2025 10:18 AM
To: [REDACTED]@woodside.com>
Cc: [REDACTED]@woodside.com>; [REDACTED]
[REDACTED]@woodside.com>; [REDACTED]@nopsema.gov.au>
Subject: Report - DRAFT - Investigation IVT14016 - Minerva Decommissioning Plastic Saddles Lost to the Marine Environment (A1209024) [SEC=OFFICIAL]

OFFICIAL

Dear [REDACTED]

Thank you to the Woodside team for providing information during NOPSEMA's investigation of plastic saddles lost to the marine environment during decommissioning of the Minerva pipeline (IVT14016).

Please find a draft copy of the investigation report attached. You are provided with an opportunity to review the report and comment on any errors of fact. NOPSEMA will then consider any written comments regarding errors of facts and finalise the investigation report. NOPSEMA requests that your comments are provided by COB Tuesday 3 June 2025.

Should you wish to meet to discuss any matters raised in the report, please don't hesitate to contact me.

Kind Regards,

[REDACTED]

[REDACTED] Decommissioning Specialist
[REDACTED]@nopsema.gov.au



NOPSEMA

Australia's offshore
energy regulator

National Offshore Petroleum Safety and Environmental Management Authority

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OFFICIAL



MINERVA DECOMMISSIONING

Engagement with NOPSEMA

10 April 2025

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AGENDA

1. Woodside and NOPSEMA Introductions
2. Minerva Field and Decommissioning Progress Update
3. Environmental Approvals
4. Schedule Update
5. Minerva Plastic saddles
6. Next Steps

4



PROGRESS TO DATE

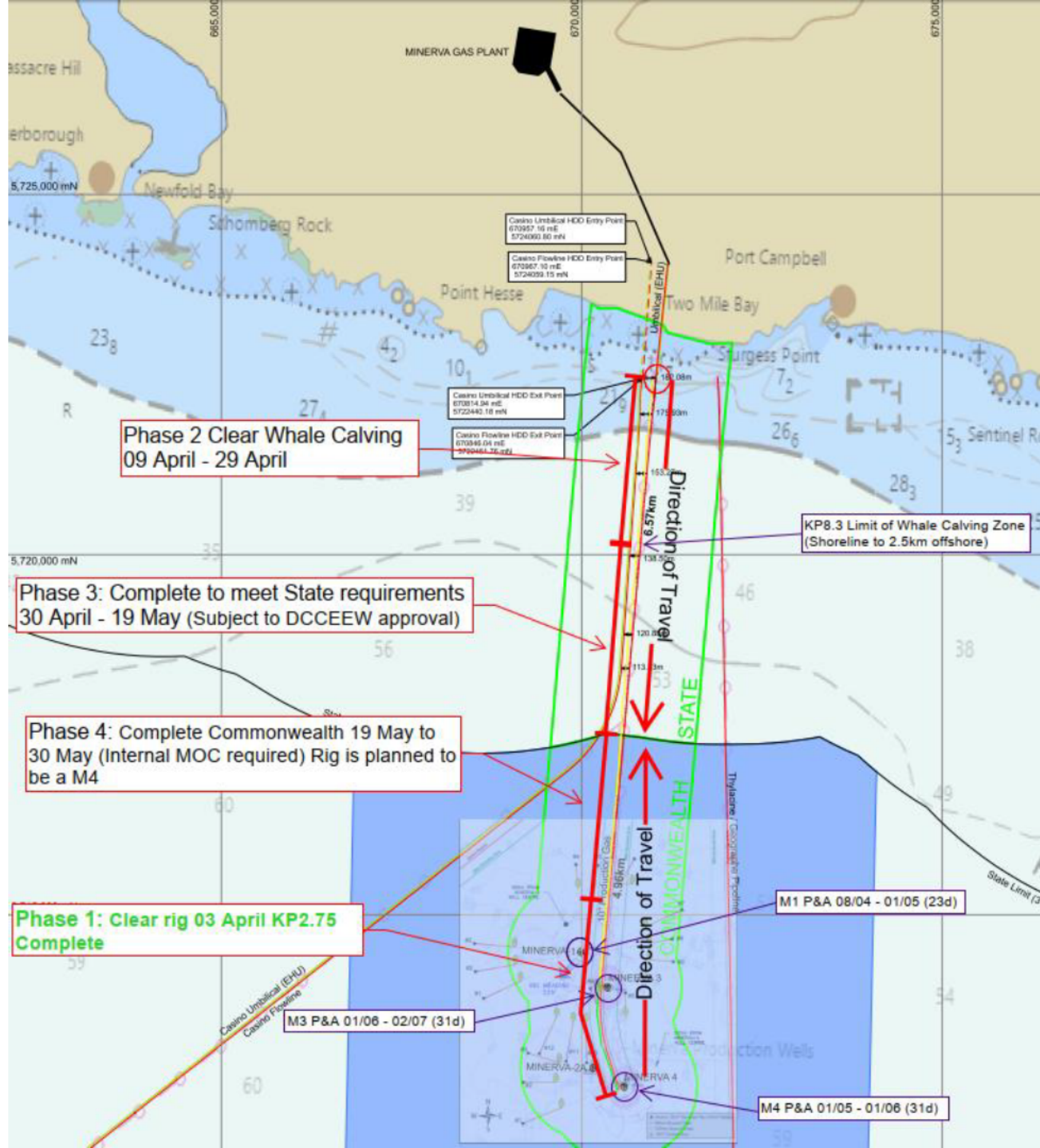
- Pipeline protection structures have all been removed
- All mattresses at the drill centre have been removed
- Minerva 2A wellhead has been severed and removed
- 10" pipeline cut and plugged at HDD exit
- Pipeline removal activities have commenced, currently sitting at 29% removal and forecast to run into 2 June 2025
- Schedule delays experienced due to:
 - Offshore commencement at back end of window
 - Additional weather downtime
 - Seabed conditions – Very soft loose sand backfilling
 - Some operations slower than expected (eg XT preps for the rig and initial structure recovery)

SCOPE PROGRESS SUMMARY		
Procedure	Scope	Completed (%)
Survey	Pipeline bundle as-found survey (Pipe tracker)	100%
	Flying lead as-found survey	100%
	Minerva-4 Drill Centre as-found survey	100%
	Minerva-4 wellhead bore cleaned	90%
	Minerva-4 XT prep works	100%
	Minerva-3 Drill Centre as-found survey	100%
	Minerva-3 wellhead bore cleaned	100%
	Minerva-3 XT prep works	80%
	Pipeline bundle as-left survey	0%
	Spools as-left survey	0%
	Minerva 2A Wellhead as-left survey	100%
	Flying leads as-left survey	100%
	Minerva-1 wellhead as-found survey	100%
	Minerva-1 wellhead bore cleaning	100%
	Minerva-1 Guidepost Cutting	100%
	Minerva-1 As-left survey	100%
Structures Recovery	2 x UTAs and associated protection structures recovery	100%
	2 x SSIVs and associated protection structures recovery	100%
	1 x PLEM assembly and protection structure recovery	100%
Pipeline Recovery	Pipeline bundle de-burial/dredging	75%
	10in HDD environmental plug installation	100%
	Umbilical/2in CI bundle HDD environmental plug installation	30%
	Pipeline bundle cutting	29%
	Pipeline recovery	29%
	2 x 8" tie in spools recovery	90%
	4 x chemical injection spools recovery	100%
Wellhead Recovery	Minerva 2A Wellhead severance	100%
	Minerva 2A Wellhead recovery	100%
Secondary Stabilisation Recovery	58 x concrete mattresses recovery	37%
	54 x grout/sandbag recovery	46%
	20 x steel ballasts recovery	100%
Flying Lead Recovery	2 x HFLs recovered	100%
	2 x EFLs recovered	100%

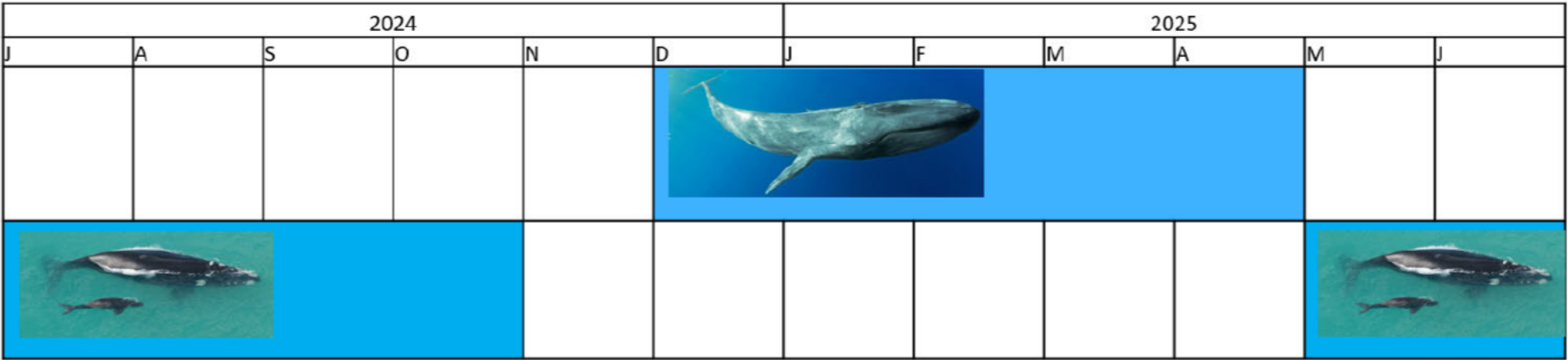
PIPELINE REMOVAL FORWARD SCHEDULE

- **Phase 1 complete** – cleared rig in Commonwealth waters 3 April
- Phase 2 - move to HDD exit location and work back towards offshore till end of April
- Phase 3 – State waters outside of reproduction BIA (*pending positive referral outcome to work in May*)
- Phase 4 – Remaining commonwealth waters section (*late May – early June*)

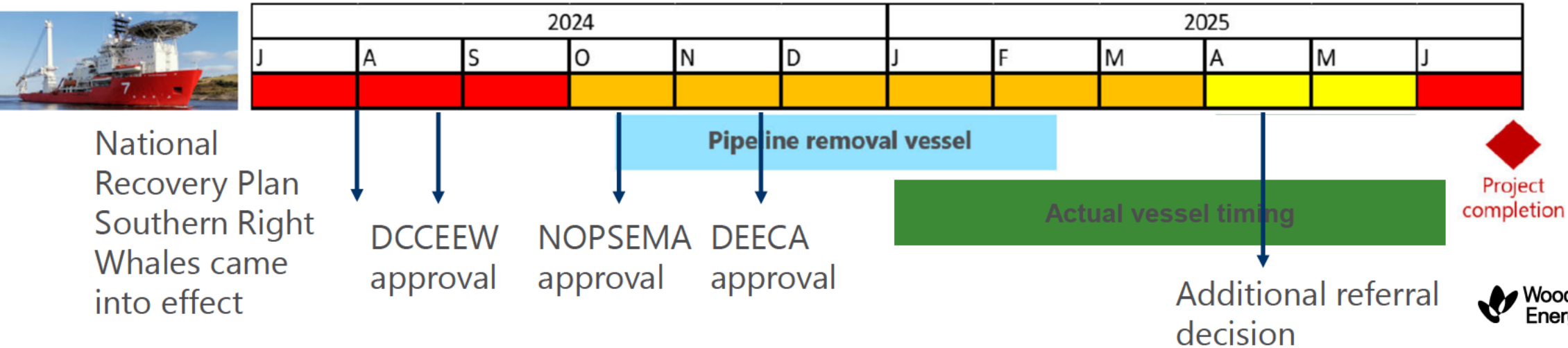
If work was to cease 31 April 2025 - would leave 2.5km of pipe in State Waters starting approx. 3.3km from shore



ANTICIPATED PROJECT SCHEDULE



Blue whales: Foraging January to April - peak numbers Feb/Mar
Southern right whales Calving June to October - peak numbers Jul/Aug



ADDITIONAL EPBC REFERRAL – May 2025 only



Regulator: DCCEEW

Cth Dept of Climate Change, Energy, Environment and Water

Minerva Decommissioning EPBC Act Referral – EPBC 2025/10138

- Pre-submission meeting 27 February 2025
- Referral 2 submitted to DCCEEW 14 March 2025
- Passed referral gateway completeness check 19 March 2025
- 10 business day public comment period 20 March to 3 April 2025
- 10 business day assessment period 14 April 2025
- Awaiting Delegate decision 14 April 2025
- Correspondence received 9 April indicates decision is likely to be not a controlled action.



Regulator: DEECA

Victorian Dept of Energy, Environment and Climate Action

Minerva Decommissioning and Field Management (State) EP

- Meeting with DEECA 19 March 2025 to discuss MOC to continue work into May.
- MOC signed off 21 March 2025 and sent to DEECA to review
- DEECA confirmed 27 March 2025 comfortable with MOC approach pending confirmation of positive referral outcome

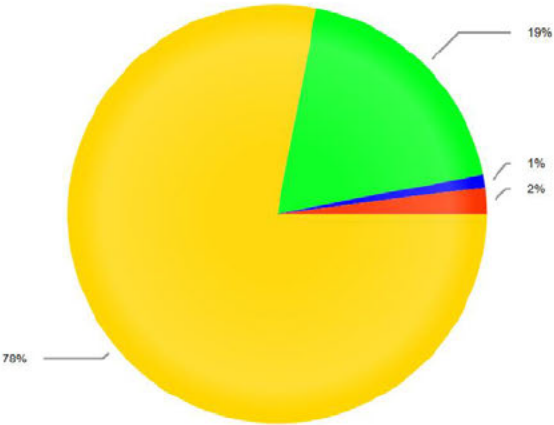
MANAGEMENT OF CHANGE PROCESS

- Woodside's Management of Change process assesses the consequence of change in activity timing to extend the duration for each of the decommissioning activities under the current accepted Environment Plans.
- Following criteria were assessed for each activity:

Criteria Triggered	
New Activity	No
Significant Modification	No
New Stage	No
New Impact or Risk	No
Significant Increase in Impact or Risk	No – Proposed action shall only be undertaken outside the southern right whale reproduction BIA during the shoulder season (May to early June), calving period is June to September (in shallow water <1 km from shore), with peak period of abundance, typically late July and August.

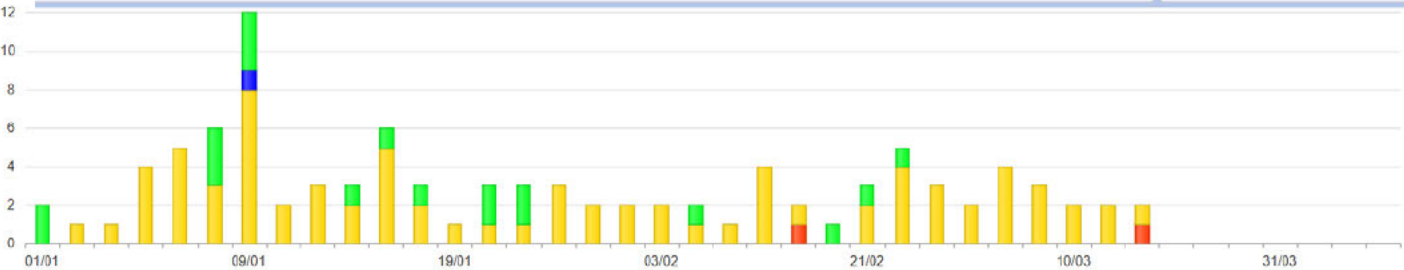
MFO OBSERVATIONS (1 Jan – 8 April 2025)

PROJECT SIGHTINGS BY SPECIES

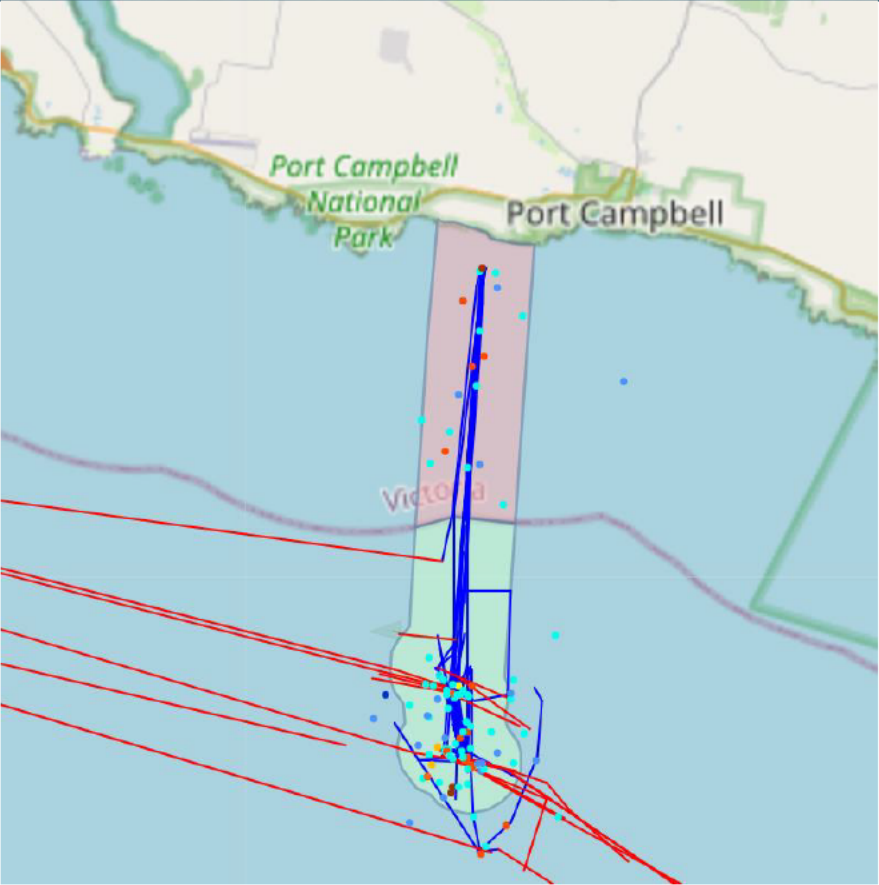


Name	Total
Dolphin	78
Pinniped	19
Mola	1
Baleen Whale	2
Project Total	100

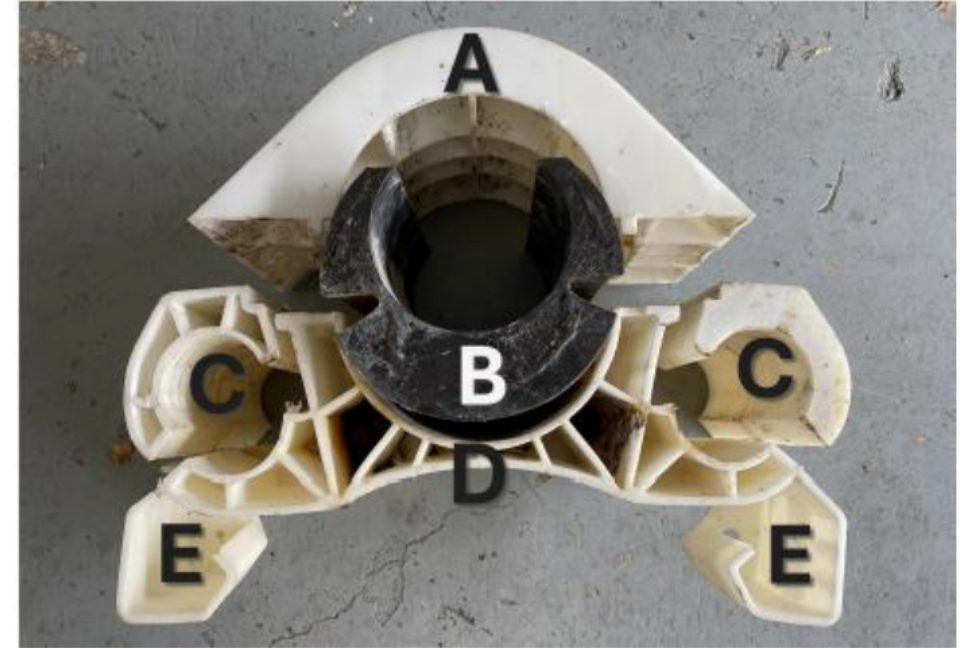
Dolphin Pinniped Mola Baleen Whale



Date	At	Species	Total ...	Sighting Cue	Observation Method
13/02	08:05	Unidentifiable baleen whale	2	Blow	Eye
14/03	12:27	Pygmy blue whale	1	Blow	Eye

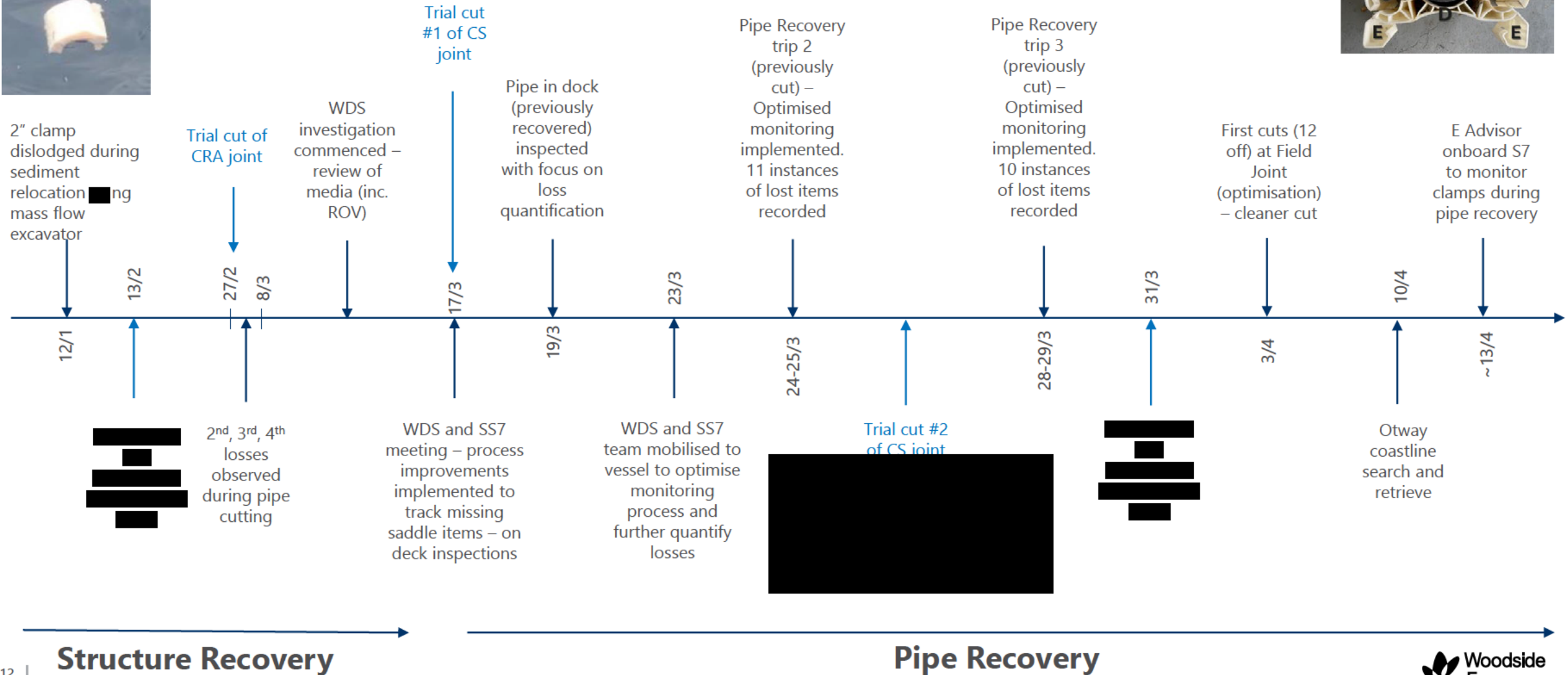
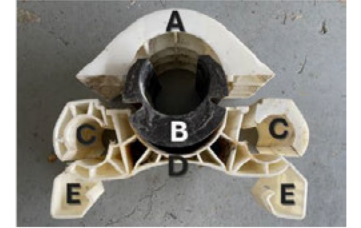


Piggyback clamps



Infrastructure	Quantity	Approximate Dimensions	Weight	Primary Materials	Current Status and Condition ¹	Removal under this EP?
Piggyback Clamps	821	360 x 446 x 400 mm	~ 3.1 Te	Polypropylene Nickel-based alloy	Current Status: Design life of 20 years. Clamps still holding piggybacked lines onto the pipeline. Burial: Predominately buried. Condition: Good condition.	Yes Commonwealth waters component only.

SADDLE CLAMP SEQUENCE OF EVENTS



SADDLE CLAMPS – FORWARD PLAN

Current Status

- Total saddle weight entire pipeline ~10,200kgs. Lost to date ~65kgs (150 items). Equivalent of ~0.6%.
 - ~70% of pipeline remaining on seabed

Preventative Measures in Place

- Cut on Field Joints (easier to identify, better separation from clamps, cleaner cut)
- Pool scoops on board to retrieve saddles if safe (sea state) – successful recovery already performed
- Continue close monitoring and log of losses as pipe is landed on deck
- Procedure to cut at least 500mm from saddle
- SS7 to report loss in daily HSE report
- Recovering negatively buoyant saddle segments with ROV

Mitigative Measures Being Evaluated

- Hydrodynamic Modelling to estimate saddle resting location has been conducted - analysis in progress
- Drone surveys of beaches (AMOSOC) to identify washed up saddles and attempt recovery
- Beach walks to recover plastic – dependent on coastline (cliffs etc)
- Drone survey from vessel when cutting to search for saddles floating to surface – limited by sea state and recovery capabilities
- FRC spotting and recovering plastic – ALARP concerns due to exposure of human life
- Risk Assessment for unplanned discharge of plastic to the environment

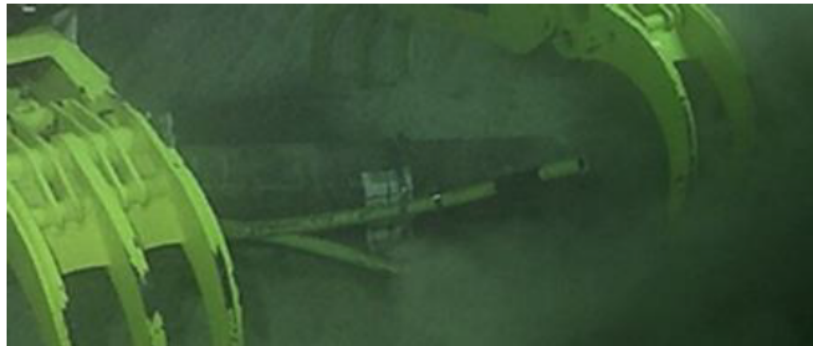
SADDLE LOSS – SUPPORTING MATERIAL



Pipeline cutting



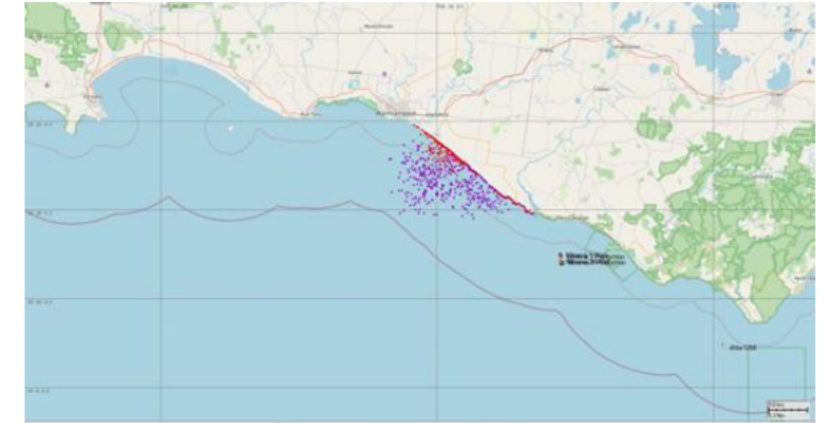
Retrieval of pipeline section



Visibility during retrieval process



Pool scoop saddle retrieval 2/4/25



Example of Drift Modelling performed for Saddle Clamps – 10,000 items

Lost Saddle Clamp Assessment

968

227 L x 108mm W x 298 D

Top Saddle

2638

223mm L x 103mm W x 1800 D

Black Rubber

172

125mm L x 103mm W x 170mm D

Twinned Saddle

1676

400mm L x 200mm W x 200 D

Base Plate (with holes)

98

110mm L x 103mm W x 83mm D

Separated 98 kg

	A		B		C		D		E		
	Number	Weight grams	Number	Weight grams	Number	Weight grams	Number	Weight grams	Number	Weight grams	
Fibre Level 1 and 2 and 3	12 Jan 25 - 195.50 Swelling	0	0	0	0	0	0	0	0	0	
	27 Feb 25	0	0	0	0	0	0	0	0	0	
	4 March 25 - 15.14	0	0	0	0	0	0	0	0	0	
	9 March 25 - 00.36	0	954	0	2528	4	688	0	0	0	
	9 March 25 - 9:52:00 AM	0	0	0	0	0	0	0	0	0	
	9 March 25 - 16.55	0	0	0	0	3	172	0	0	0	
	9 March 25	0	954	0	2528	4	688	0	0	0	
	10 March 25 - 05.35	0	954	0	2528	4	688	0	0	0	
	Pipe no. 90 KPI, 1.65 x 1.65	0	954	0	2528	4	688	0	0	0	
	Pipe no. 108 KPI, 202 to KPI 202	0	954	0	0	2	344	0	0	0	
Fibre Level 2 34-35 March	Pipe no. 112 KPI, 220 to KPI 210	0	0	0	2	344	0	0	0	0	
	Pipe no. 121 KPI, 127 to KPI 107	0	954	0	0	3	318	0	0	0	
	Pipe no. 129 KPI, 102 to KPI 113	0	954	0	0	4	688	0	0	0	
	Pipe no. 134 KPI, 97 to KPI 910	0	954	0	0	0	0	0	0	0	
	Pipe no. 137 KPI, 480 to KPI 113	0	954	0	0	4	688	0	0	0	
	Pipe no. 140 KPI, 475 to KPI 148	0	954	0	0	4	688	0	0	0	
	Pipe no. 143 KPI, 543 to KPI 527	0	0	0	0	0	0	0	0	0	
	Pipe no. 156 KPI, 697 to KPI 689	0	954	0	0	4	688	0	0	0	
	Pipe no. 157 KPI, 589 to KPI 689	0	954	0	0	0	0	0	0	0	
	Pipe no. 158 KPI, 589 to KPI 689	0	954	0	2518	4	688	0	0	0	
Fibre Level 3 28-29 March	4165 KPI, 756 to KPI 767	0	954	0	2518	4	688	0	0	0	
	4178 KPI, 889 to KPI 804	0	0	0	0	0	0	0	0	0	
	4179 KPI, 804 to KPI 815	0	0	0	0	0	0	0	0	0	
	4180 KPI, 815 to KPI 827	0	0	0	0	0	0	0	0	0	
	4181 KPI, 827 to KPI 837	0	0	0	0	0	0	0	0	0	
	4182 KPI, 837 to KPI 840	0	0	0	0	0	0	0	0	0	
	4183 KPI, 840 to KPI 852	0	0	0	0	0	0	0	0	0	
	4184 KPI, 852 to KPI 862	0	0	0	0	0	0	0	0	0	
	4185 KPI, 862 to KPI 872	0	0	0	0	0	0	0	0	0	
	4186 KPI, 872 to KPI 882	0	0	0	0	0	0	0	0	0	
Fibre Level 4 28-29 March	4207 KPI, 454 to KPI 467	0	954	0	2518	4	688	0	0	0	
	4208 KPI, 467 to KPI 479	0	954	0	2518	4	688	0	0	0	
	4209 KPI, 479 to KPI 490	0	954	0	2518	4	688	0	0	0	
	4210 KPI, 490 to KPI 500	0	954	0	2518	4	688	0	0	0	
	4211 KPI, 500 to KPI 510	0	954	0	2518	4	688	0	0	0	
	4220 KPI, 479 to KPI 490	0	954	0	2518	4	688	0	0	0	
		14	53,412	7	57,768	63	16,836	17	26,400	36	3680
									</		

Log of Saddle Losses

Environmental incident

EPO 9 Impacts from subsea discharges associated with decommissioning activities limited to localised, temporary changes in water and sediment quality in the vicinity of the discharge location.	C 8.1 See above.	PS 8.1 See above.	MC 8.1.1 See above.
	C 9.1 No cutting of the pipeline at field joins unless engineering assessment demonstrates that no plastic debris will be released.	PS 9.1 An engineering assessment must be undertaken prior to cutting the pipeline at a field join. The engineering assessment must provide reasonable assurance that plastic debris will not be released to the marine environment. The assessment must be completed before any pipeline cuts at field joins may be made to remove the pipeline.	MC 9.1.1 Engineering assessment documentation demonstrates that Woodside is reasonably satisfied that field join cuts (if required) will not release plastic debris to the marine environment.
	C 9.2 Debris created during Minerva subsea infrastructure removal to be recovered where practicable.	PS 9.2 Debris greater than 300 mm x 300 mm created during Minerva subsea infrastructure removal will be recovered where practicable.	MC 9.1.2 Records (e.g., ROV observations) demonstrate that field join cuts did not release plastic debris to the marine environment. MC 9.2.1 Records demonstrate that any debris created during Minerva subsea infrastructure removal observed by ROVs greater than 300 mm x 300 mm is recovered where practicable.

Relevant Plan/Conservation Advice	Relevant Objectives	Threats and or Management Strategies Relevant to the Activity
Threat Abatement Plan for the Impacts of Marine Debris on Vertebrate Wildlife of Australia's Coasts and Oceans (Commonwealth of Australia, 2018)	There are four relevant objectives: - Objective 1: Contribute to the long-term prevention of the incidence of marine debris Objective 2: Understand the scale of impacts from marine plastic and microplastic on key species, ecological communities and locations - Objective 3: Remove existing marine debris Objective 4: Monitor the quantities, origins, types and hazardous chemical contaminants of marine debris, and assess the effectiveness of management arrangements for reducing marine debris.	Ship-sourced marine debris as a risk to vertebrate marine life through entanglement or ingestion

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ABN 55 004 898 962

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[REDACTED]

From: [REDACTED]@Subsea7.com>
Sent: Wednesday, 26 February 2025 4:54 PM
To: [REDACTED]
Cc: [REDACTED]; Seven Sisters Offshore Manager
Subject: Plastic saddle observed

Hi team,

As discussed with [REDACTED] this afternoon, we observed a plastic saddle wing float up when undertaking shear cutting subsea. We were not able to find it on the surface. Here is an attached photo for context.

From our discussions onshore between [REDACTED] and myself a few weeks ago, we agreed we would advise if this occurs again and we would re-assess reporting requirements and mitigation actions based on frequency. i.e. 2 or 3 saddles per 24 hour period.



Regards,

[REDACTED]

eMail [REDACTED]@subsea7.com
Mobile + [REDACTED]

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[REDACTED]

From: Seven Sisters Project HSE <SevenSisters.ProjectHSE@Subsea7.com>
Sent: Tuesday, 4 March 2025 3:54 PM
To: WSR Seven Sisters Minerva; [REDACTED]
Cc: [REDACTED]; Seven Sisters Offshore Manager; Seven Sisters Project Engineer
Subject: 250304 Plastic saddle dislodged
Attachments: IMG_6453.JPG

Hi all,

We have identified a plastic saddle detach during cut 21 at 1514hrs 4/3/25. Attached photo with the saddle coming apart. The cut was made approximately 0.5m from the plastic saddle with the shear cutters. We maintained visual presence on the surface but were unable to locate the saddle to recover. We will log this on our hazard register for tracking. Now that we have a better understanding of the effect from cutting and failure rate, the team will aim for at least 1m away from the saddle when a planned cut approaches it.

Kind Regards

[REDACTED]
Seven Sisters

eMail [REDACTED]@[Subsea7.com](mailto:SevenSisters.ProjectHSE@Subsea7.com)



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