

## Woodside Decommissioning – Changes to General Directions

Document No: A1234978

**Item for:** Compliance Committee

**Meeting Date:** 16 July 2025

**Risk Appetite Category:** Regulatory approach

**Committee Sponsor:** [REDACTED]

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### Recommendation:

The Committee endorses:

- Revoking, revising and reissuing General Directions 831, 832, and 833, issued in August 2021 to initiate and complete decommissioning activities at the [REDACTED], [REDACTED], and Minerva petroleum projects.

### Impact and Benefit

- Revoking and reissuing the General Directions will:
  - Provide a revised timeline to support thorough planning so that remaining property can be removed safely and in an environmentally responsible manner.
  - Require specific measures to prevent further health, safety, and environmental incidents.
  - Require identification and incorporation of lessons learned to improve future decommissioning planning.
- Extending the timeframes may attract criticism from some stakeholders, who may view it as a lenient response to a non-compliance with a General Direction.

### Communication

- Multiple discussions have been held with Woodside, including a meeting on 25 June 2025 to review project status and potential next steps.
- Draft General Directions would be shared with all titleholders for comment prior to finalisation.
- Woodside has written to NOPSEMA proposing amendments to the General Direction timeframes and seeking clarity on the future pathway for completing decommissioning scopes.

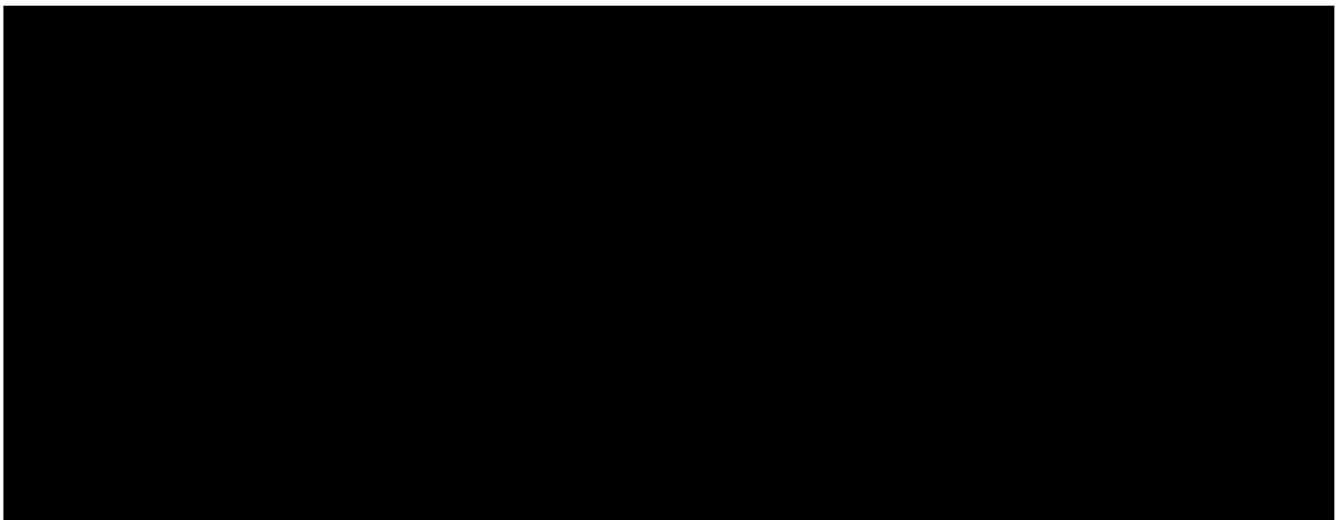
### Key Points

- Woodside has made material progress in meeting many requirements outlined in the General Directions.
- Several health, safety, and environmental incidents have occurred during the execution phase. NOPSEMA inspections and investigations have identified:
  - Non-compliance with permissioning documents.
  - Limitations with Woodside's risk assessments and management.

- Woodside has indicated that the current timeframes may be prioritising speed over safety. Woodside has used timeline limitations as a basis for not adopting mitigative control measures in permissioning documents in some cases.
- Woodside has advised NOPSEMA that additional years may be required to safely complete the remaining operations.
- Given the potential changes to the remaining removal activities (e.g. timeline, method, contractor) a combination of new and revised Safety Case(s) and Environment Plan(s) may be necessary to complete activities.

## Background

- Woodside is currently subject to four General Directions: #831, [REDACTED], [REDACTED], and [REDACTED], issued to addressing their decommissioning obligations.
- Significant progress has been made, particularly in completing well plug and abandonment (P&A) activities at [REDACTED], [REDACTED], and Minerva ([REDACTED] wells were previously P&A'd).
- However, incidents across multiple projects suggest that risks and complexities were underestimated during planning. Examples include:



- Minerva:
  - Release of 186kg of plastic saddles to the marine environment in both Commonwealth and Victorian waters whilst cutting and retrieving flowline/umbilical bundle sections (reported 16 April 2025).
- Remaining activities involve complex and high-risk property removal across the [REDACTED], [REDACTED] Minerva fields. Woodside has indicated that they would like an additional [REDACTED] [REDACTED] 3 years to complete Minerva [REDACTED].
- A number of different options have been explored including:
  - Maintain current General Directions - continue monitoring progress and enforce compliance as necessary.

- Reissue General Directions - Adjust timeframes and include additional actions to ensure risks are managed and appropriate controls are in place for remaining high-risk activities.
- Pursue Alternative Compliance Actions - Targeted enforcement such as Improvement Notices or revisions to permissioning documents to address specific safety or environmental management gaps.
- Enforceable Undertaking - Woodside could voluntarily commit to completing decommissioning obligations and implementing controls under a legally binding agreement.

- [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

#### Issues Considered:

#### Financial Implications (Budget)

- Nil

#### Risk Tolerance

- Moderate tolerance regarding our regulatory approaches provided it is proportionate, evidence-based, and reflects due process and procedural fairness.

#### Planning Implications (AOP/Corporate Plan/KPIs)

- Supporting the governments decommissioning framework included in our Corporate Plan

#### Consultation

- Discussed with [REDACTED] as the [REDACTED] and [REDACTED] as the [REDACTED]

#### Author(s) and Date

- [REDACTED] and [REDACTED]
- 3/7/2025.

#### Attachments

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|---|------------------------------|
| 1. Woodside GD Update Minerva July 2025                   | ( <a href="#">A1237532</a> ) |
| [REDACTED]  | [REDACTED]                   |
| 4. Draft General Direction – VIC/L22 and VIC/PL33 Minerva | ( <a href="#">A1232861</a> ) |
| [REDACTED]  | [REDACTED]                   |
| [REDACTED]  | [REDACTED]                   |