

General Direction – s 574

Offshore Petroleum and Greenhouse Gas Storage Act 2006 (Cth)

Direction No: 1897

To Woodside Energy Limited and Mitsui E&P Australia Pty Limited:

Issue of Direction/s - section 574 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006*

I, Derrick O'Keeffe of the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA), make this instrument under section 574 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (the Act) [pursuant to the Instrument of delegation dated](#) 2 August 2022.

Derrick O'Keeffe
Head of Division – Safety and Integrity
wA660584

23 December 2022

1. Commencement

This direction takes effect on the date of signature.

2. Application

This direction applies to Woodside Energy Limited [ACN 005 482 986] and Mitsui E&P Australia Pty Limited [ACN 108 437 529], the registered holders of WA-28-L.

3. Direction

- a. The registered holders of WA-28-L are given the directions contained in Schedule 1.
- b. Each direction in Schedule 1 is a separate direction.

Schedule 1

Direction 1

The registered holders must take all reasonable measures to continue to monitor the status of the riser turret mooring (RTM) and mitigate the risk from the RTM presenting a collision risk to other marine users or presenting an environmental risk, and to continue to take such measures until such time that the RTM has been decommissioned.

Direction 2

The registered holders must notify NOPSEMA as soon as reasonably practicable of any change in the status of the RTM, and the actions it is intending to take to assess and control the associated risks.

Direction 3

As soon as reasonably practicable following any change in the status of the RTM referred to in Direction 2, the titleholder must conduct an assessment of the condition of the RTM and provide to NOPSEMA a report on the outcomes of the assessment and the control measures that will be implemented. The control measures proposed must be to NOPSEMA's satisfaction.

Direction 4

The registered holders provide a fortnightly report (or other period as agreed with NOPSEMA) from the 6 January 2023 to cover the status of the RTM, a current risk assessment, the control measures in place or planned, and the forward plan through to decommissioning of the RTM.

Explanatory Statement

Production commenced from the Enfield field in WA-28-L through the Nganhurra Floating Production Storage and Offloading (FPSO) facility in 2006. Production ceased on 7 November 2018 with the Nganhurra FPSO permanently departing the field on 5 December 2018.

This Direction relates to the Nganhurra riser turret mooring (RTM) in production licence WA-28-L. The RTM is approximately 83m long, between 4.5 and 8.5m in diameter and weighs approximately 2529 tonnes. The RTM is connected to the seabed by three sets of three catenary anchor mooring chains and is designed to extend approximately 6.5 m above the water line.

Woodside informed NOPSEMA on 15 November 2022 that the draft of the Nganhurra RTM had increased, resulting in a reduction of the RTM height above the water line. The increased draft of the RTM had been observed by Woodside in mid-October. Offshore inspections undertaken by Woodside in November 2022 identified unexpected water within compartment 6. On 21 November 2022, Woodside advised the RTM sat approximately 5m above the water line, which is approximately 1.5m lower in the water than its previous draft.

Woodside notified NOPSEMA on 20 December 2022 that the RTM draft monitoring system had indicated the RTM had sunk by an additional 150 to 200 mm. As a result, NOPSEMA is of the opinion that the integrity of the RTM has been further compromised and is at risk of submerging or sinking. This could pose a range of navigational risks to vessels in the area, and safety and environmental risks. This General Direction has been issued to the titleholders to ensure the impacts and risks that may occur from the RTM are managed until it can be safely removed from the title area.

It is noted that NOPSEMA have previously issued Improvement Notice 0775 (dated 23 October 2019) to Woodside to make arrangements so that the RTM can be removed for onshore disposal as soon as reasonably practicable and to implement systems to inspect, maintain and repair the RTM to ensure it does not submerge or sink, and present a collision risk to other marine users.

General Direction 812 was also issued on the 5 February 2021 which requires all property brought into the title area associated with the Enfield field (which includes the RTM) to be removed on or before 31 December 2024.

Since that time, Woodside has assessed multiple removal methods, some more advanced than others. It has an accepted Environment Plan for the ongoing management of the RTM while it remains on station. NOPSEMA is currently assessing an EP for the decommissioning of the RTM. Relevant safety cases will also be required, to complete the decommissioning activities.

Notes

Breach of a direction

Under sub section 576(1) of the Act, if a person is subject to a general direction under section 574 and the person engages in conduct that breaches that direction, the person commits an offence:

Fault-based offence – 5 years imprisonment or 2,000 penalty units, or both (10,000 penalty units for a body corporate).

Strict liability offence – 100 penalty units (500 penalty units for a body corporate).

Civil penalty provision – 525 penalty units (2,625 penalty units for a body corporate).

Continuing offences – a person who commits a fault-based or strict liability offence commits a separate offence in respect for each day during which the offence continues. The maximum penalty for each day that the offence continues is 10% of the maximum penalty that can be imposed in respect to that offence.

Continuing contraventions of civil penalty provisions – a person who contravenes the civil penalty provision commits a separate contravention in respect for each day during which the contravention continues. The maximum civil penalty for each day that the contravention continues is 10% of the maximum civil penalty that can be imposed in respect to that contravention.