

General Direction – s 574

Offshore Petroleum and Greenhouse Gas Storage Act 2006 (Cth)

Direction No: 1913

To Woodside Energy Limited (ACN 005 482 986) and Mitsui E & P Australia Pty Ltd (ACN 108 437 529)

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

I, Cameron Grebe, Head of Division, Environment, Decommissioning and Renewables of the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA), **REVOKE** instrument number 812 and 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 13 June 2023.

Cameron Grebe
Head of Division – Environment, Decommissioning and Renewables
wA727146

27 July 2023

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 Ltd (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

To plug or close off, to the satisfaction of NOPSEMA, all wells listed in Schedule 2 of this Direction as soon as practicable but not later than 30 June 2024.

Direction 2

To remove, or cause to be removed, from the offshore area the Nghanurra Riser Turret Mooring and deliver it to a suitable onshore facility for disposal as soon as practicable but not later than 1 April 2024.

Direction 3

To remove, or cause to be removed, from the offshore area all remaining property (including but not limited to property listed in Schedule 3), brought into that area by any person engaged or concerned in the Nghanurra operations authorised by the WA-28-L licence, and deliver it to a suitable onshore facility for disposal, as soon as practicable but not later than 31 December 2024.

Direction 4

To provide, to the satisfaction of NOPSEMA, for the conservation and protection of the natural resources in the licence area as soon as practicable but no later than 31 December 2025.

Direction 5

To make good, to the satisfaction of NOPSEMA, any damage to the seabed or subsoil in the licence area as soon as practicable but no later than 31 December 2025.

Direction 6

- a) Prepare a monthly report summarising progress with implementing Direction 2 and associated decommissioning activities, until NOPSEMA informs the registered holders it is satisfied that Direction 2 has been complied with.
- b) The report prepared under Direction 6(a) must include the information detailed in Schedule 4 and be published on the registered titleholders' website(s), no later than the 14th day of each month.
- c) Submit to NOPSEMA, on an annual basis, a decommissioning progress report detailing progress with implementing these directions and associated decommissioning activities until all decommissioning works have been completed.
- d) The report submitted under Direction 6(c) must be to the satisfaction of NOPSEMA and submitted to NOPSEMA no later than 31 December each year until the conclusion of this direction.
- e) Publish the report on the registered holders' website within 14 days of obtaining NOPSEMA satisfaction under Direction 6(d).

Schedule 2 – Wells associated with Nganhurra operations in WA-28-L

Wells	
ENA01	ENB02
ENA02	ENB03
ENA03	ENC01
ENA04	ENC02
ENA05	ENC03
ENE01	ENC04
ENE02	ENC05
ENE03	END01
ENB01	END02

Schedule 3 – Property associated with Nganhurra operations in WA-28-L

Anchor Chains 1–9

Production Manifold EDC1

Production Manifold EDC2

Production Manifold EDC3

Production Manifold EDC5

Production flowline with riser 1

Production flowline with riser 2

Production test flowline with riser

Two water re- injection flowlines with risers

Gas injection flowline riser

Five Electro-hydraulic umbilicals

All production, water injection and gas injection subsea well xmas trees

Schedule 4 – Information to be included in monthly decommissioning progress report

The following information must be included, as a minimum, in the monthly decommissioning progress report required by Direction 6.

- A description of the steps and actions reasonably necessary to be undertaken from the commencement of this General Direction to commencement of the removal campaign in order to be prepared to safely remove and dispose of the riser turret mooring, including but not limited to those steps detailed in the explanatory statement, and an associated schedule (timeline).
- A description of the works to be completed during the removal campaign, including information about offshore works, onshore works and final suitable onshore disposal facility, and an associated schedule (timeline). The description is to be updated each month as new information comes to hand and/or in response to public enquiries.
- A description of progress against both schedules described above.
- Details of any changes to the integrity or condition of the riser turret mooring and/or changes to the activity including plans for the management of impacts and risks that may affect the ability to safety and environmentally responsibly remove and dispose the RTM.
- Contact details to enable interested persons to seek further information or request to be consulted by Woodside on this activity.

Explanatory Statement

Background

This Direction relates to property currently in, and wells drilled in the title area pertaining to Nganhurra offshore operations in production licence WA-28-L. The scope of this direction does not apply to property associated with the Cimatti and Vincent fields located in WA-28-L, or the Pipeline Licence WA-28-PL, which geographically overlaps the production licence.

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

NOPSEMA's records indicate that the property associated with the Nganhurra operations remaining in WA-28-L title area may include, but not be necessarily limited to:

- Six (6) horizontal production wells and two (2) deviated production wells, eight (8) water injection wells and two (2) gas injection wells.
- A flowline and riser system which consists of two (2) 9-inch production flowlines, one (1) 8-inch production test flowline, one (1) 10-inch water re-injection flowline, one (1) 6-inch gas injection flowline and one (1) 6-inch gas lift flowline. There are two (2) production dynamic risers, one (1) test dynamic riser, one (1) water reinjection, one (1) gas lift and one (1) gas reinjection dynamic riser;
- A riser turret mooring and anchor system; and
- Subsea structures (manifold, rigid spools, electric and hydraulic jumper and other small structures).

The registered holders have commenced and are progressing the removal of some of this property from the WA-28-L title area.

NOPSEMA issued General Direction 812 on 5 February 2021. Since this time the structural integrity of the Nganhurra Riser Turret Mooring has further deteriorated, necessitating further enforcement action by NOPSEMA (including General Direction 1897, which remains in force). The root cause of this deteriorating structural integrity remains unknown and fortnightly reporting on the status of the riser turret mooring as required by General Direction 1897 has informed NOPSEMA of further deterioration (via survey of the J-tubes), increasing uncertainty regarding potential failure mechanisms and pathways. This increases the risk of the RTM sinking and heightens the risk to safety of people for any subsequent recovery activities and the environment. Until such time as the RTM is fully removed from the offshore area risks will continue and may escalate.

Based on this changed risk profile, NOPSEMA is satisfied that it is reasonably practicable for the registered holders to complete full removal of the RTM structure from the offshore area as detailed in Direction 2. The direction also provides greater transparency for the removal and remedial actions, given the level of public interest, whilst maintaining the requirements set in General Direction 812 regarding overall field decommissioning in the title area.

In order for the registered holders to comply with directions, NOPSEMA recognises that reasonable steps to be taken will include:

- that personnel are directed and supported to remove property as ‘as soon as practicable’. For example (but not limited to) financial investment and project progression decisions and are completed with priority in line with the project schedule.
- Allocation of sufficient resources to support compliance with all directions above. For example, in relation to Direction 2, this would include having dedicated resources working on the primary removal project and other dedicated resources working on contingency and emergency response planning and implementation.
- Establishing and maintaining necessary contracts and arrangements, including for suitable vessel(s) and equipment, in a way that ensures that the timelines and outcomes in this direction can be met.
- Obtaining and maintaining necessary approvals, including environment plan, WOMP and safety cases and any other approvals or permits from all relevant authorities or agencies.

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.