

General Direction

Offshore Petroleum and Greenhouse Gas Storage Act 2006 – s574

Date: 24/07/2025

To: Woodside Energy (Australia) Pty Ltd
Mobil Exploration & Producing Australia Pty Ltd
Inpex Alpha Ltd

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

I, Graham Blair, Deputy Chief Executive Officer of the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA), **REVOKE** instrument number 832 and make this direction under section 574 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (the Act), as a delegate of the CEO of NOPSEMA, pursuant to an instrument of delegation dated 31 January 2024.

Graham Blair
Deputy Chief Executive Officer
wA1003022

24 July 2025

1. Commencement

This General Direction takes effect on the date of signature.

2. Application

This direction applies to Woodside Energy (Australia) Pty Ltd (ACN 006 923 879) (Woodside), Mobil Exploration & Producing Australia Pty Ltd (ACN 004 588 827) and Inpex Alpha Ltd (ARBN 003 730 756), the registered holders of WA-10-L and WA-3-PL.

3. Directions

- (a) The registered holder(s) of WA-10-L and WA-3-PL are given the directions contained in Schedule 1.
- (b) Each direction in Schedule 1 is a separate direction.

Schedule 1 – Directions

The registered holders are directed to take the following actions:

Direction 1

- a) Recommence the removal of the property listed in Schedule 2 from WA-10-L and WA-3-PL no later than 30 April 2027.
- b) Complete the removal of all the property listed in Schedule 2 as soon as reasonably practicable, and no later than 31 December 2027.

Direction 2

Prior to the commencement of each offshore campaign to remove the property listed in Schedule 2, the following actions must be completed:

- a) Conduct a review of the status and condition of the property to be removed.
- b) Undertake and document a risk assessment to identify and evaluate all risks to health, safety and the environment associated with removal activities. The risk assessment must demonstrate that control measures are in place to reduce risks to as low as reasonably practicable (ALARP).
- c) Review and update relevant procedures required to ensure risks to health, safety and the environment are reduced to ALARP.
- d) Develop and implement a training program to ensure that all personnel involved in removal activities are aware of their responsibilities regarding safety and environmental management.
- e) Conduct a project readiness review to verify compliance with all relevant health, safety and environmental management requirements. The review must confirm that control measures are in place to ensure safe and environmentally responsible operations.
- f) Submit a copy of the documented outcomes from the project readiness review to NOPSEMA within 7 days of its completion.

Direction 3

Provide for the conservation and protection of the natural resources in the title areas, to the satisfaction of NOPSEMA, within 18 months after the property referred to in Direction 1 is removed.

Direction 4

Make good, to the satisfaction of NOPSEMA, any damage to the seabed or subsoil in the title areas caused by any person engaged or concerned in the operations authorised by the titles within 18 months after the property referred to in Direction 1 is removed.

Direction 5

- a) Submit to NOPSEMA a report detailing plans and progress to meet Direction 1, every 6 months commencing 1 November 2025.
- b) The report must be submitted by Woodside on behalf of all the registered holders and include all information specified in Schedule 3 and must be signed by a company officer of Woodside confirming its accuracy and completeness.

Direction 6

a) Complete a review of all decommissioning project planning undertaken since 30 August 2021 for WA-10-L and WA-3-PL, with the review to be fully completed by 30 June 2026. The review must evaluate the adequacy and effectiveness of the planning process, including, but not limited to:

- the allocation of budget and resources,
- decision-making processes related to the selection of contractors, vessels, and specialised equipment, and
- the implementation of measures to meet health, safety, environmental, and other regulatory obligations.

The review must also identify specific, measurable, and actionable opportunities for improvement.

- b) A comprehensive full Lessons Learnt report documenting the review's findings, conclusions, and recommendations must be submitted to NOPSEMA by no later than 1 August 2026.
- c) A Lessons Learnt presentation to be shared with other industry participants through an industry forum or other means no later than 31 December 2026.
- d) A publicly available summary of the Lessons Learnt report and presentation to be published no later than 31 December 2026 on the registered titleholders' website.

Explanatory Statement - Direction number: 2017

Background

Production commenced from the Griffin, Scindian and Chinook fields in the WA-10-L title area in 1994 via the Griffin Venture Floating Production, Storage and Offloading vessel (FPSO) vessel with gas exports to shore through the Griffin gas export pipeline in WA-3-PL. Production ceased in September 2009 and the FPSO permanently departed the fields in November 2009.

Between January and May 2013, the Riser Turret Mooring (RTM) buoy lost buoyancy and sank to the seabed. In 2017, BHP Petroleum (Australia) Pty Ltd plugged or closed off production wells in the Griffin field. Wellheads were left in place and production trees laid on the seabed. Mid depth buoys were removed from the field in 2018.

On 30 August 2021, NOPSEMA issued General Direction 832 to the registered holders of WA-10-L and WA-3-PL, requiring them to address their outstanding decommissioning obligations. Since then, the registered holders have undertaken substantial property removal activities within the offshore title area.

However, following several preventable health, safety, and environmental incidents, including potential worker exposure to hydrogen sulfide (H₂S) and a hydrocarbon release during flowline removal operations, activities were paused to reassess operational risks.

In response, General Direction 832 was revoked, and General Direction 2017 issued. General Direction 2017 provides additional time and clarity for the registered holders to complete essential planning and preparatory activities. This is intended to ensure that all future property removal operations are conducted in a safe and environmentally responsible manner.

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.

Schedule 2 – Property to be removed

Scope	Amount
Wellheads	1
Flexible Flowlines	63.1 km
Umbilicals	100 m
Mid Depth Buoy Chains	7

Schedule 3 – Biannual progress report (Direction 5)

The plan must include the following:

1. Project Overview

- Names of all titleholders.
- Identification of the offshore titles relevant to the removal activities.
- Description of the scope, objectives, and purpose of the property removal campaign(s).

2. Scope of Property Removal

- Detailed list of all property scheduled for removal.
- Current condition and status of each item.
- Description of property successfully removed during the previous reporting period, including dates and methods used.

3. Implementation Plan

- Detailed schedule of removal activities, offshore campaigns, including key milestones and deadlines.
- Description of removal techniques, equipment, and technologies to be employed.
- Identification of contractors, vessels, and major equipment involved in the campaign.

4. Activity Summary

- Summary of removal activities undertaken during the reporting period.
- Comparison of actual progress against the planned schedule.
- Justification for any deviations from the original plan.
- Analysis of factors affecting progress (e.g., weather conditions, technical challenges, contractor performance).

5. Updated Timeline

- Revised estimate for overall project completion.
- Key activities and milestones planned for the upcoming six-month reporting period.

6. Regulatory Compliance

- Status update on compliance with the General Direction.
- Summary of regulatory approvals and permits obtained or pending.
- Confirmation of alignment with the accepted Environment Plan and Safety Case(s).

7. Declaration

- A signed and dated declaration by a company officer of Woodside on behalf of all the registered holders, confirming that the report is accurate, complete, and compliant with all applicable requirements.