

# Acceptance of Montara-1,2,3 Wellhead Removal Environment Plan

Document No: A1348480

Date: 17 June 2026

1. On 22 April 2026, I, [REDACTED], Director Decommissioning – Environment, delegate of the Chief Executive Officer of the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) decided, pursuant to reg 33 of the *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2023* (Environment Regulations), to accept the Montara-1,2,3 Wellhead Removal Environment Plan (Document No. TM-70-PLN-I-00010, Revision 0, dated 24 March 2026) (the EP) as I was reasonably satisfied that the EP met the criteria in reg 34 of the Environment Regulations.
2. The EP was submitted by Jadestone Energy (Eagle) Pty Ltd (ACN 627 006 679) (titleholder), to enable the titleholder to undertake the petroleum activity described in the EP, which involves vessel-based removal of 3 wellheads, Montara-1, 2 and 3 from the Montara Field (Production Licence AC/L7) within Commonwealth waters.
3. For the purposes of assessing the EP, I was assisted by an assessment team comprised of a lead assessor and a decommissioning specialist.
4. The reasons for my decision are set out below.

## Legislative framework

5. All references to a regulation (reg) are to the Environment Regulations unless otherwise stated.
6. All definitions contained in the Environment Regulations are applied to those terms used in this statement.
7. The legislation relevant to my decision is set out in the Environment Regulations [link](#).

## Background

8. On 31 December 2025, the titleholder submitted the EP to NOPSEMA in accordance with the Environment Regulations.
9. On 7 January 2026, NOPSEMA provisionally decided in accordance with reg 27 that the submission did not include material apparently addressing all the provisions in Division 2 of the Environment Regulations, and provided notice to the titleholder in accordance with reg 29 inviting the titleholder to modify and resubmit the EP.
10. On 9 January 2026, the titleholder submitted an updated EP, and on 12 January 2026, NOPSEMA provisionally decided in accordance with reg 27 that the EP included material addressing all the provisions in Division 2 of the Environment Regulations and published the EP on NOPSEMA's website in accordance with reg 28(1).
11. On 4 February 2026, NOPSEMA requested further information, pursuant to reg 32. The request identified that further information on a number of the criteria in reg 34 was required. In response to this request, the titleholder resubmitted the EP incorporating additional information on 24 March 2026.
12. The EP that is the subject of this decision was received on 24 March 2026 (Document No. TM-70-PLN-I-00010, Revision 0, dated 24 March 2026).

13. On 22 April 2026, I decided to accept the EP as I was reasonably satisfied that the EP met the criteria in reg 34.

## Materials

14. The materials considered in making this decision include, but are not limited to, those set out in Appendix A and are referenced where relevant in the reasons below.

## Decision overview

15. The issue before me was whether the EP should be accepted pursuant to reg 33. This required that I be reasonably satisfied that the EP meets the 'acceptance criteria' in reg 34.
16. Further, in accordance with regs 16 and 34, I must not accept an EP unless I am reasonably satisfied that the titleholder is compliant with subsection 571(2) of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (OPGGGS Act) in relation to the activity, and the compliance is in a form that is acceptable to me. On review of the titleholder's financial assurance declaration and confirmation forms, I was reasonably satisfied that the titleholder was compliant with section 571(2), and the financial assurance declaration and confirmation forms were acceptable. I therefore considered that the precondition in reg 16 was met.
17. I then considered the criteria in reg 34 and was reasonably satisfied that the EP met those criteria. I therefore accepted the EP. My reasons for this part of my decision are set out below.

## Should the environment plan be accepted?

18. Under the Environment Regulations, in order to accept the EP, I had to be reasonably satisfied that the criteria in reg 34 were met.
19. Regulation 32(4) requires that, when making my decision as to whether the EP should be accepted, refused or accepted in part or with conditions, I was required to consider the further information that the titleholder provided on 24 March 2026, pursuant to the request made by NOPSEMA on 4 February 2026. The information the titleholder provided in response to the request was contained in the resubmitted version of the EP, which resulted in the final version of the EP (Revision 0).
20. Against this background (and having considered the materials in Appendix A), I made the following findings against each criterion for acceptance of the EP in reg 34.

### The EP is appropriate for the nature and scale of the activity: reg 34(a)

21. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of reg 34(a).
22. I found that the EP contains a suitable description of the activity to inform how it may affect the environment (Section 2). This is because the scope and bounds of the activity are clearly described to inform the potential environmental impacts and risks associated with the activity. I found that the EP contains an adequate description of the proposed location, spatial extent, and duration of the activities. The EP also describes the types, specifications, and composition of property that currently exists on title and that will be removed under the EP (wellheads and associated debris), and the vessels and supporting equipment (e.g. remotely operated vehicles [ROV], wellhead removal equipment) that will be brought into the title area and used to undertake the activity. Further examples as to why I was satisfied include that the EP contains:
  - a. a clear delineation of 'Operational Areas' (OA) within Section 2, comprising the Montara-1, Montara-2 and Montara-3 wellheads within Production Licence AC/L7, and a defined 500 m radius around each of the wellheads that will be in place during wellhead recovery.

- b. an appropriate geographical description of the OA, with the activity located in Commonwealth waters of the Timor Sea within the Montara Field in water depths of ~70–90 m. The surrounding environment (including the details of relevant values and sensitivities) is described in Section 3, Appendix C and Appendix D.
  - c. an appropriate temporal description of the activity. The EP states that each wellhead removal activity is expected to take ~2 days, with a total campaign duration of ~14 days, including mobilisation and demobilisation (Section 2.5). The EP includes provision for the activity to occur at any time during the life of the EP (5 years), supported by commitments to undertake annual reviews of suitable vessel and equipment availability. The timing of the activity provides operational flexibility to undertake removal activities without increasing risks to the environment.
  - d. an adequate level of detail for the property to be removed, with the wellheads comprised of steel, gaskets, elastomeric seals (Section 2.6) and debris at each wellhead location described (Section 2.1).
  - e. a description of the potential wellhead removal methodologies, including abrasive water jet cutting (preferred method), external diamond wire cutting, and mechanical internal cutting (Section 2.9) and the use of a dynamically positioned vessel, and ROVs that will be used to complete the activity (Section 2.7 and Section 2.8).
  - f. an appropriate description of the scope of activities, including that 'the wellheads will be removed and recovered as part of the petroleum activity' (Section 2.9). The activity also includes removal of debris associated with the wellheads, pre-removal and post-removal ROV surveys, and supporting vessel operations.
23. The EP contains a thorough description of the activity components with the greatest potential to generate impacts and risks to the environment, including seabed disturbance, vessel emissions and discharges, underwater noise, and potential hydrocarbon spill scenarios (Sections 2, 6 and 7). For example, the EP:
- a. describes the use of vessel-based operations and ROV activities, including pre-removal and post-removal seabed surveys, which have the potential to generate localised seabed disturbance and underwater noise (Section 2.7).
  - b. describes the wellhead cutting and removal processes, including the preferred and alternative cutting methodologies, and outlines how these activities may interact with the seabed and surrounding environment (Section 2.9).
  - c. describes vessel operations and associated emissions (including discharges, lighting and noise), to inform how these may affect the environment during the activity (Section 2.8).
  - d. identifies unplanned events, including the unlikely event of a vessel collision leading to a marine diesel oil (MDO) spill, and provides the basis for assessing potential environmental impacts arising from such unplanned events (Section 7).
24. I found that the EP clearly describes the environment that may be affected (EMBA) by both unplanned and planned aspects of the activity, with a logical basis for deriving the boundaries (Section 5.7). For example:
- a. the EMBA is defined by areas that may be affected by an unplanned event associated with the activity, which is defined through modelling of hydrocarbon spill scenarios (including vessel-based MDO spills). The modelling applies appropriate hydrocarbon exposure thresholds (e.g. surface, entrained, dissolved and shoreline exposure) and is consistent with relevant NOPSEMA guidance.

- b. potential environmental impacts from planned aspects of the activity have been defined, including localised zones of seabed disturbance and water quality changes associated with vessel operations and cutting activities within the OAs (Sections 2 and 6).
25. I found there is a thorough description of the environment that may be affected by the activity, with sufficient detail to inform the evaluation of environmental impacts and risks. I considered the level of detail included in the EP to be appropriate to the nature and scale of predicted environmental impacts and risks and includes appropriate descriptions of physical, biological, socioeconomic and cultural features of the marine and coastal environment (Section 3, Appendix C). These include, but are not limited to, marine fauna (including EPBC Act listed threatened and migratory species), benthic habitats, fisheries, and cultural values identified through contemporary means such as EPBC Act Protected Matters Search Tool outputs (Appendix D).
26. I found that the EP includes sufficient information on the legislative and other requirements (such as laws, codes, standards, agreements, treaties, conventions, or practices) that are relevant to the activity and demonstrates how they will be met throughout the life of the activity (Section 1.4). Appendix B of the EP provides further detail on applicable legislation and requirements. I also found that the EP describes the requirements from policies, plans of management, recovery plans, conservation advice, and other guidance for matters protected under the EPBC Act and demonstrates how these will be met through the evaluation of impacts and risks in Sections 6 and 7.
27. I found that a sufficiently robust method, consistent with HB 203:2012 and AS/NZS ISO 31000:2009, was applied in the EP for the identification and evaluation of the environmental impacts and risks from the activity (Section 5). I considered that the detail and rigour applied to the impact and risk assessments (Sections 6 and 7) is commensurate to the magnitude of the impacts and risks related to the activity, and that the level of analysis and evaluation is proportionate to the nature and scale of the activity.
28. The EP describes a framework for identifying control measures to reduce the consequence and/or likelihood of impacts and risks, and demonstrates this through the evaluation and selection of control measures within Sections 6 and 7. All reasonable control measures are considered and evaluated in 'ALARP Assessment' tables, with justification provided for those that are not adopted. Control measures that are adopted are clearly presented within 'environmental performance' tables.
29. I found that the information provided during relevant persons consultation had been appropriately considered, evaluated, and incorporated into the EP where it was relevant to describe the environment that may be affected by the activity.

**The EP demonstrates that the environmental impacts and risks of the activity will be reduced to as low as reasonably practicable: reg 34(b)**

30. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of reg 34(b).
31. Section 5 of the EP describes the process applied to both planned activities (Section 6) and unplanned events (Section 7) to evaluate whether impacts and risks are reduced to as low as reasonably practicable (ALARP). The EP outlines a clear, systematic and reproducible process for the evaluation of environmental impacts and risks, including identification of control measures and justification for whether control measures are adopted or not adopted. The evaluation of control measures is based on environmental benefit and consideration of practicability and cost effectiveness of implementation.

32. The process described in the EP is applied appropriately and consistently for both planned and unplanned events, with adopted control measures clearly presented within 'environmental performance' tables. Other reasonable control measures are considered, and evaluated as not adopted, with adequate justification within the 'ALARP Assessment' tables for each aspect.
33. The EP demonstrates that the adopted control measures are described in sufficient detail to demonstrate that they will be functional, reliable and compatible with other control measures. For example, the EP:
  - a. describes contingency arrangements for wellhead removal activities, including potential failure scenarios and defined response actions (Section 2.10).
  - b. provides flexibility for different wellhead removal methodologies (e.g. abrasive water jet cutting, diamond wire cutting, mechanical internal cutting), with selection of methods based on environmental and operational considerations (Section 2.9).
  - c. describes the use of pre-removal and post-removal ROV surveys to verify seabed conditions and confirm removal of infrastructure (Section 2.7).
  - d. states that the 3 wellheads are expected to be removed within the same campaign over the 5-year validity period of the EP (Section 2.5.1). A control measure is included requiring that at least annually, a review is undertaken to identify whether suitable vessels and equipment are available to undertake the activity.
34. The EP demonstrates that the evaluation of impacts and risks has informed the selection of suitable control measures to reduce the consequence and/or likelihood of impacts and risks. The control measures outlined in Sections 6 and 7 are sufficiently detailed to demonstrate that they will be effective in reducing impacts and risks for the duration of the activity.
35. The level of detail in the ALARP assessment is commensurate to the nature and scale of the potential impacts and risks associated with the activity. The EP provides a reasonable demonstration that no additional control measures could be implemented that would further reduce impacts and risks without incurring costs that would be grossly disproportionate to the environmental benefit gained. For example, in relation to key risks associated with vessel operations and potential introduction of marine pests (Section 7.1), the EP adopts control measures consistent with legislative requirements and industry practice, including vessel assurance processes, biosecurity controls, and compliance with relevant maritime legislation and standards.
36. I was satisfied that the EP demonstrates that the risk of unplanned events will be reduced to ALARP because:
  - a. control measures are described in sufficient detail to reflect their implementation during the activity. These measures address credible spill scenarios, including vessel collision leading to an MDO release, and include prevention, preparedness and response controls within the EP and Oil Pollution Emergency Plan (OPEP, Sections 7 and 8.5).
  - b. the EP evaluates a range of control measures, including those identified through relevant persons consultation and those required under legislation, standards and the titleholder's management system. The ALARP demonstration includes consideration of other control measures that could be reasonably considered and provides justification why such measures are not adopted.
  - c. there is sufficient detail to demonstrate that the adopted control measures will be effective in reducing impacts and risks to ALARP for the duration of the activity. These include measures implemented at the activity level (e.g. vessel operations, wellhead removal procedures), as well as broader controls such as emergency response arrangements and management systems.

- d. the EP clearly links control measures to environmental performance outcomes (EPOs), environmental performance standards (EPSs), and measurement criteria (MC) within Sections 6 and 7, with further supporting detail provided in the implementation strategy (Section 8).
  - e. sufficient information is provided to demonstrate that control measures can be implemented, monitored and verified, including through defined MC, monitoring activities, and reporting processes.
37. In addition, information obtained during consultation has been incorporated into the ALARP demonstration where relevant. For example, feedback from the Department of Transport has informed updates to spill response arrangements, including updates to the OPEP, demonstrating that consultation outcomes have contributed to reducing risks to ALARP.

**The EP demonstrates that the environmental impacts and risks of the activity will be of an acceptable level: reg 34(c)**

38. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of reg 34(c).
39. I was satisfied that the EP demonstrates that the environmental impacts and risks of the activity will be managed to an acceptable level because the:
- a. EP defines acceptable levels of impact through assessment against a set of guiding principles (Section 5.3), including the principles of ecologically sustainable development (ESD), conservation and management advice, stakeholder feedback, reputational considerations, environmental context, and the Jadestone HSE Policy and Management System. Residual impacts ranked 'green' are considered tolerable and acceptable where they meet these guiding principles, while 'orange' and 'red' ranked impacts are considered unacceptable (Section 5.4 and 5.6).
  - b. evaluation of impacts and risks applies the framework described above, systematically comparing predicted impacts to the guiding principles to demonstrate that they will be of an acceptable level. Table 5-5 summarises the impact consequence ratings, with all impacts ranked as acceptable, supported by the justification provided throughout Section 6.
  - c. impacts and risks associated with the activity are well understood and consistent with activities commonly undertaken within the offshore petroleum industry.
  - d. impact and risk predictions are based on conservative assumptions and credible worst-case scenarios, consistent with regulatory expectations. These predictions are supported by modelling, environmental data and established industry practices.
  - e. EP includes sufficient detail on control measures and their implementation to demonstrate that they will be effective in ensuring impacts and risks remain acceptable. These control measures are clearly linked to EPOs, EPS and MC.
  - f. EP demonstrates that the activity will not result in significant impacts to matters protected under Part 3 of the EPBC Act. The activity is of short duration and limited spatial extent, and the assessment demonstrates that potential impacts will be localised, temporary and therefore of an acceptable level.
  - g. EP demonstrates that the activity does not contravene applicable management principles or plans for protected areas, including World Heritage Areas, National Heritage Places or Ramsar wetlands as the OAs do not overlap with such protected places, and potential interactions within the EMBA have been appropriately assessed (Sections 3, 6 and 7).



- h. EP gives regard to relevant policy documents, guidance, bioregional plans and instruments under the EPBC Act, including the North-West Marine Bioregional Plan. The acceptability evaluation demonstrates that the activity is consistent with the objectives and management intent of these documents (Sections 6 and 7).
40. The EP identifies and addresses areas of uncertainty within the impact and risk evaluation. Predictions are supported by conservative assumptions, appropriate modelling and precautionary approaches where relevant. For example:
- a. uncertainty in oil spill risk has been addressed through the use of conservative modelling assumptions, including assessment of a worst-case vessel collision MDO spill scenario of 400 m<sup>3</sup>, and application of defined exposure thresholds – consistent with expectations contained within relevant NOPSEMA guidance – to determine potential impacts to environmental receptors (Section 5.7 and Section 7, Section 8.5).
  - b. uncertainty in the evaluation of seabed disturbance has been addressed through consideration of conservative scenarios, including the worst-case scenario of 1 m of well infrastructure remaining above the seabed should the contingency method of external cutting need to be implemented (Section 6.5.2).
  - c. emergency preparedness and response arrangements are designed to address a range of credible scenarios, with scalable response capability to manage uncertainty in unplanned events (Section 8.5).

**The EP provides for appropriate environmental performance outcomes, environmental performance standards, and measurement criteria: reg 34(d)**

41. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of reg 34(d).
42. The EP contains EPOs, EPSs and MC for the impacts and risks of the activity (Sections 6 and 7).
43. The EP presents this information within 'Environmental Performance' tables for each impact and risk pathway, where EPOs, control measures, EPSs and MC are linked in a structured manner.
44. I was satisfied that the EP provides appropriate EPOs that:
- a. address all identified environmental impacts of the activity, including seabed and benthic habitat disturbance, light emissions, noise emissions, atmospheric emissions, interaction with marine users, operational discharges, and spill response activities (Section 6).
  - b. address all the identified environmental risks of the activity, including marine pest introduction, interaction with fauna, unplanned release of solids, and unplanned spill scenarios (Section 7).
  - c. when read in conjunction with associated EPSs, establish measurable levels for the management of environmental aspects of the activity.
  - d. when considered alongside the environmental impact and risk evaluations and adopted control measures, function to demonstrate that impacts and risks will be managed to ALARP and to an acceptable level.
  - e. are appropriately linked to relevant legislative requirements and environmental objectives. For example, an EPO that the 'removal of infrastructure meets the requirements of OPGGS Act section 572(3) and 270(3c)' (Section 6.1.3).
  - f. addresses impacts to matters protected under the EPBC Act, including commitments such as 'No death or injury to EPBC listed marine fauna due to activities within the Operational Area', which is consistent with conservation advice and regulatory expectations.

45. I was also satisfied that the EP provides appropriate EPSs that:
- contain clear and unambiguous statements of environmental performance. The EPSs describe how control measures will function to reduce environmental impacts and risks to ALARP and to an acceptable level. For example, in relation to seabed disturbance and infrastructure removal, the EP specifies that 'Recovered infrastructure (wellhead and conductor) are disposed or recycled using licensed contractors and waste facilities, in accordance with relevant legislation of the receiving jurisdiction' (Section 6.1).
  - have clear MC that link directly to the EPSs and provide a basis for demonstrating compliance. For example, post-removal survey requirements are defined, including verification that no oil and gas infrastructure or debris remains within the defined clearance radius, providing a measurable and auditable outcome.
  - include clearly defined responsibilities for implementation, with each control measure, EPS and MC linked to specific roles, enabling effective accountability and verification of performance.
  - are supported by additional environmental performance measures within the OPEP, including arrangements for spill preparedness and response performance, which complement the EP commitments (OPEP Table 3-2).
46. I considered that the EPOs, EPSs and MC are clearly linked and complementary to one another, as presented within the 'Environmental Performance' tables in Sections 6 and 7 of the EP. The structure of these tables ensures that:
- each environmental aspect and associated impact or risk is addressed.
  - control measures are clearly defined and linked to EPSs.
  - MC provide a clear basis for monitoring, verification and compliance.
47. EPOs are clear and consistently linked to the relevant impact and risk pathways. The linkage between EPOs, EPSs and MC is logical, unambiguous and supports effective implementation and assurance that environmental performance commitments will be achieved.

**The EP includes an appropriate implementation strategy and monitoring, recording, and reporting arrangements: reg 34(e)**

48. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of reg 34(e).
49. The implementation strategy includes an appropriate environmental management framework for the activity which describes systems, practices and processes that are adequate to ensure all environmental impacts and risks will continue to be managed to ALARP and acceptable levels for the duration of the activity (Section 8).
50. The management of change (MOC) process is adequately described in the EP (Section 8.4.1) and is supported by Jadestone's internal Change Management Procedure. The process is appropriate because:
- it provides a structured approach for assessing changes to the activity, including determining whether a revision to the EP is required and whether resubmission to NOPSEMA is necessary.
  - changes are subject to risk assessment to identify potential new or increased environmental impacts or risks not previously addressed in the EP.
  - opportunities for continuous improvement are assessed through Jadestone's 'Operational Excellence' function, with knowledge and best practice captured and incorporated through mechanisms such as audits, inspections, drills, incident reviews and technical learnings.

51. The implementation strategy includes measures to ensure that personnel are aware of their responsibilities in relation to the EP, including during emergencies or potential emergencies, and have the appropriate competencies and training (Section 8.2).
52. The Montara 1,2,3 Wellhead Removal OPEP (Document No. TM-50-PLN-I-00009, Rev 0 dated 24 March 2026) is appropriate as it includes arrangements that are suitable, given the spill scenario presented. Specifically, the OPEP details the:
  - a. oil pollution response control measures that will be used to reduce the impacts and risks of the activity to ALARP and an acceptable level.
  - b. arrangements for responding to and monitoring oil pollution to inform response activities, and that response arrangements are consistent with the national system for oil pollution preparedness and response.
  - c. arrangements for updating and testing the oil pollution response arrangements and control measures.
  - d. monitoring of impacts to the environment from oil pollution and response activities.
  - e. immediate (first strike plan) response measures that provides the oil pollution arrangements and control measures in an operational deployment context.
53. Monitoring, recording and reporting arrangements are adequately described and include internal and external reporting requirements, as well as incident reporting arrangements (Sections 8.3, 8.4 and 9). These arrangements are appropriate as the information collected will:
  - a. be based on EPOs, control measures, EPSs and MC defined in the EP.
  - b. include records of environmental performance and any planned or unplanned discharges to the marine environment.
54. The EP provides appropriate arrangements for auditing, review and management of non-conformance to ensure that EPOs, EPSs and other commitments in the EP are met (Section 8.3). This includes risk-based assurance activities and inspections, processes for identifying, recording and addressing non-conformances, and systems for tracking environmental commitments and verifying implementation through compliance registers or equivalent tools.
55. Ongoing consultation arrangements are appropriate to the nature and scale of the activity (Section 4 and Section 8.1) and include:
  - a. standard consultation and notification actions (Table 4-8) and triggered consultation actions (Table 4-9).
  - b. a commitment to ensure that relevant persons are kept informed of activities, including through specific performance outcomes relating to stakeholder engagement.
  - c. notification to relevant persons prior to commencement of activities and for significant changes or incidents.
  - d. ongoing engagement and consideration of feedback during the life of the EP, including incorporation through MOC processes.

**The EP does not involve the activity, or part of the activity, other than arrangement for environmental monitoring or for responding to an emergency, being undertaken in any part of a declared World Heritage Property within the meaning of the EPBC Act: reg 34(f)**

56. Based on the reason below, I was reasonably satisfied that the EP met the requirements of reg 34(f).

57. The EP clearly describes the boundaries of the activity (Section 2 and Section 3), including the location of the OAs within Production Licence AC/L7 in the Timor Sea which demonstrates that no part of the activity will be undertaken in any part of a declared World Heritage Property within the meaning of the EPBC Act.

**The EP demonstrates that the titleholder has carried out the consultations required by Division 3, and the measures (if any) that are adopted because of the consultations are appropriate: reg 34(g)**

58. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of reg 34(g).
59. Regulation 34(g) has two components which the EP must demonstrate:
- First, that consultation has occurred as required by reg 25, including consultation with each 'relevant person' and in the manner prescribed by regs 25(2)–(4).
  - Second, that the titleholder has adopted, or proposed to adopt, appropriate measures in light of those consultations.
60. Overall, I must be reasonably satisfied that consultation undertaken was appropriate and adapted to the nature of the relevant persons.
61. The EP provides a clear and suitably detailed description of the consultation process undertaken, including the approach to identifying relevant persons, the methods used to provide information, and how a reasonable period for consultation was determined (Section 4). The methodology is appropriate to the nature and scale of the activity.
62. The identification process provided for a broad and systematic capture of relevant persons, such that relevant persons who could reasonably be identified were included. This is supported by:
- consideration of the categories of relevant persons under reg 25(1), including government authorities, persons with functions, interests or activities that may be affected by the activity, and persons whose interests may be affected.
  - application of the terms 'functions', 'interests' and 'activities' in a manner consistent with NOPSEMA guidance, taking into account the nature of the activity, the environment that may be affected, and the potential impacts and risks.
  - use of multiple information sources to identify relevant persons, including stakeholder databases, government agencies, industry groups, and First Nations representative bodies (Section 4).
  - recognition that Traditional Owners' connection to Sea Country constitutes an interest under reg 25(1)(d), and appropriate steps were taken to identify and consult relevant First Nations groups.
  - evidence that the EP clearly identifies relevant persons and includes sufficient records to demonstrate that consultation has been undertaken in accordance with regulatory requirements (Appendix E).
63. As required by reg 25(2), relevant persons were provided with sufficient information to make an informed assessment of the possible consequences of the activity on their functions, interests or activities. This is supported by:
- provision of clear information on the purpose of consultation, including regulatory context and opportunities to provide feedback.
  - provision of activity-specific information, including the nature of the activity, the EMBA, and potential environmental impacts, risks and control measures.

- c. use of multiple engagement methods, including emails, information packages, phone calls and community sessions, to ensure information was accessible and appropriately tailored to different stakeholders (Section 4.10.4).
  - d. provision of responses to queries and requests for additional information during the consultation process, as documented in Appendix E.
  - e. evidence that responses to queries, objections and claims were reasonable, supported and appropriately detailed.
64. As required by reg 25(3), a reasonable period for consultation was provided, including that consultation initially commenced with wellhead removal activities included in consultation material provided in 2023 (Appendix E), which allowed relevant persons sufficient time to consider the information provided and respond.
65. Consultation included multiple engagement points, follow-ups and opportunities for feedback, supporting the view that reasonable efforts were made to facilitate effective participation by relevant persons.
66. As required by reg 25(4), relevant persons were advised that they may request that information provided during consultation be treated as confidential and not published. This is reflected in the consultation materials and supporting documentation (Appendix E and Sensitive Information Report).
67. In relation to First Nations persons identified as relevant persons under reg 25(1)(d), the EP demonstrates that consultation was undertaken in a manner appropriate to their interests and circumstances. This is supported by:
- a. provision of consultation opportunities and supporting information to identified First Nations representative bodies and organisations (Section 4 and Appendix E).
  - b. use of engagement methods tailored to accessibility and availability, including community sessions and direct engagement.
  - c. a flexible approach to consultation, including accommodating requests for additional information or engagement where practicable.
68. The report on consultation includes a summary of each objection or claim, an assessment of its merit, the titleholder's response and evidence of identification of any measures adopted as a result included the incorporation of stakeholder feedback (Table 4-7 and Appendix E). For example, appropriate information incorporated into the EP includes:
- a. updates to the OPEP following consultation with the Department of Transport.
  - b. the inclusion of notifying AMSA Joint Rescue Coordination Centre 48 hours prior to operations commencing.

**The EP complies with the Act and Regulations: reg 34(h)**

69. Based on the reasons below, I was reasonably satisfied that the EP met the requirements of reg 34(h). This is because I found that the EP:
- a. is consistent with the objects of the Environment Regulations, including the principles of ESD as demonstrated through the acceptability determination applied to the impacts and risks evaluated in Sections 6 and 7.
  - b. includes an EP summary as required by reg 35(7), with the 'Environment Plan Summary' table providing a clear mapping of EP content to regulatory requirements.

70. I also determined that the EP is consistent with section 572 of the OPGGS Act because:
- a. the wellheads will be removed and recovered as part of the petroleum activity (Section 2.9).
  - b. the Montara-1,2 and 3 well final abandonment reports (FARs) were submitted to NOPSEMA, confirming that the wells were plugged and abandoned in accordance with the well operations management plan (WOMP).
  - c. the activity is planned to be undertaken within the period of validity of the EP, which provides operational flexibility to undertake removal activities without increasing risks to the environment.
  - d. a control measure is included which requires that at least annually, a review is undertaken to identify whether suitable vessels and equipment are available to undertake the activity, providing increased operational efficiency.
  - e. the presence of the wellheads prior to removal does not present an increasing or unmanaged environmental risk over the EP validity period. This is supported by:
    - i. the EP identifying that the wellheads are structurally stable, components and composition are well known and understood (e.g. steel and minor elastomeric seals that pose negligible environmental risk), and corrosion rates are low with no credible mechanism for significant environmental impact or risk during the period prior to removal.
    - ii. ongoing monitoring of infrastructure condition.
    - iii. ongoing controls, including maintained navigational charting and notification of infrastructure.
  - f. the EP is consistent with section 270(3) of the OPGGS Act, with the EP addressing the application of section 270(3)(c) and related provisions in Section 2.12. Specifically, I considered that:
    - i. section 270(3)(c)(i) is addressed through the removal of property above the mudline, leaving the seabed clear, consistent with legislative requirements specifically for the 3 wellheads
    - ii. section 270(3)(d) has been satisfied for the Montara-1, 2 and 3 wells, for which FARs were submitted to NOPSEMA confirming that the wells were plugged and abandoned in accordance with the WOMP.
    - iii. the EP supports a conclusion under sections 270(3)(e) and (f) that there will be no ongoing impacts to natural resources, the seabed, or the subsoil following removal of the wellheads due to a sandy and featureless seabed that does not support significant marine species, and the use of water based muds to drill the wells and no evidence of drill cuttings piles at the wellhead locations.
71. The EP acknowledges and commits to applicable requirements of the Environment Regulations relevant to the activity, including notification and reporting obligations under reg 46 and reg 54, as reflected in Table 8-5.
72. I was satisfied that the EP addresses the content requirements of regs 21–24 with clarity, consistency and a level of detail commensurate with the nature and scale of the activity. Specifically, the EP:
- a. has been submitted in writing in accordance with reg 26(6).
  - b. includes commitments to comply with relevant notification and reporting requirements to NOPSEMA.

- c. contains a report on consultation that meets the requirements of reg 24(b), including:
  - i. a summary of each response provided by a relevant person (Appendix E).
  - ii. an assessment of the merits of any objection or claim about adverse impacts (Appendix E).
  - iii. a statement of the titleholder's response, or proposed response, to each objection or claim (Appendix E).
  - iv. a copy of the full text of responses provided in the sensitive information part of the EP, consistent with regulatory requirements.
73. In relation to the report on consultation under reg 24(b), I found that the information presented in the EP is reasonably accurate and fairly represented, based on a review of the full text consultation records contained within the sensitive information part of the EP.
74. I observed that information meeting the definition of 'sensitive information' under reg 5 is appropriately contained only within the sensitive information part of the EP. In accordance with reg 26(8), such information is not included within the main body of the EP.

## Other considerations

### The Program: matters protected under Part 3 of the EPBC Act

75. The Streamlining Program endorsed under section 146 of the EPBC Act outlines the environmental management authorisation process under the EPBC Act for offshore petroleum and greenhouse gas activities administered by NOPSEMA and requires NOPSEMA to comply with Program responsibilities and commitments.
76. In implementing the Program, NOPSEMA conducts assessments of EPs against the requirements of the Program, which includes meeting the acceptance criteria and content requirements under the Environment Regulations. Specific Program commitments relating to matters protected under Part 3 of the EPBC Act are outlined in Table 2 of the Program report and must be applied by NOPSEMA during decision making with respect to offshore projects and activities.
77. In accordance with the Program, I considered matters protected under Part 3 of the EPBC Act, including listed threatened and migratory species, and was reasonably satisfied that the activity under the EP met the requirements of the Program on the basis that:
  - a. the activity will not result in unacceptable impacts on listed threatened species and is not inconsistent with relevant recovery plans and threat abatement plans for listed threatened species.
  - b. appropriate control measures are presented in the EP to ensure that impacts to threatened or migratory species will be of an acceptable level. Control measures relevant to matters protected under Part 3 of the EPBC Act include:
    - i. controls to minimise interactions with marine fauna, including implementation of vessel management measures such as adherence to approach distances, speed restrictions where relevant, and visual observation protocols to avoid collisions or disturbance (Sections 6 and 7).
    - ii. selection of non-explosive wellhead removal methods (e.g. abrasive water jet or mechanical cutting), which avoids high-intensity impulsive noise and reduces the risk of injury or disturbance to marine fauna (Sections 2.9 and 2.10).
    - iii. implementation of pre- and post-removal ROV surveys to minimise uncertainty and ensure seabed disturbance is localised and does not result in habitat degradation (Section 2.7).



- iv. oil spill prevention, preparedness and response arrangements, including an activity-specific OPEP, which provides response strategies and prioritisation of sensitive environmental receptors within the EMBA (Sections 7 and 8).
  - v. biosecurity and vessel assurance controls to minimise the risk of IMS, including compliance with applicable legislation and management of ballast water and biofouling, thereby protecting ecological values and species within the Commonwealth marine area (Section 7.1).
  - vi. notification and communication measures to inform marine users and reduce the risk of vessel interactions, thereby indirectly reducing risks to protected species and habitats (Section 4 and Table 4-8).
78. These measures, in combination, are proportionate to the nature and scale of the activity and ensure that impacts to matters protected under Part 3 of the EPBC Act are localised, temporary and do not result in population-level or ecosystem-level effects.

## Conclusion

79. For the reasons set out above, I was reasonably satisfied that the EP met the criteria set out in reg 34. Being also satisfied that the titleholder was compliant with section 571(1) (and met reg 16), I accepted the EP.

**Director Decommissioning – Environment**

## Appendix A: Key materials considered in making the decision

1. In making this decision, I considered the documents making up the EP submission in accordance with legislative requirements and NOPSEMA policy and procedures. The material that I had regard to in making this decision included, but was not limited to:
  - a. Montara-1,2,3 Wellhead Removal Environment Plan (Document No. TM-70-PLN-I-00010, Revision 0, dated 24 March 2026)
  - b. Montara 1,2,3 Wellhead Removal Oil Pollution Emergency Plan (Document No. TM-50-PLN-I-00009, Rev 0, dated 24 March 2026)
  - c. Sensitive information reports – Supporting Montara 1,2,3 Wellhead Removal Environment Plan – Part A -1 (no document number), Part A-2 (no document number)
  - d. Historic sensitive information (Document No. TM-70-PLN-I-00003, Revision 1)
  - e. The legislative framework relevant to EP assessments, including:
    - i. The OPGGS Act
    - ii. The Environment Regulations
    - iii. The EPBC Act Program<sup>1</sup>.
  - f. NOPSEMA Policies and Guidelines:
    - i. Assessment policy (N-04000-PL0050)
    - ii. Environment plan assessment policy (N-04750-PL1347)
    - iii. Environment plan decision making guidelines (N-04750-GL1721)
    - iv. Consultation in the course of preparing an Environment Plan guideline (N-04750-GL2086)
    - v. Section 572 Maintenance and removal of property regulatory policy (N-00500-PL1903)
    - vi. Petroleum activity guidance note (N-04750-GN1343)
  - g. Guidance:
    - i. NOPSEMA Environment plan content requirements guidance note (N-04750-GN1344)
    - ii. NOPSEMA Petroleum activities and Australian marine parks guidance note (N-04750-GN1785)
    - iii. NOPSEMA Oil pollution risk management guidance note (N-04750-GN1488).
    - iv. Department of Industry, Science, Energy and Resources, Offshore Petroleum Decommissioning Guideline (2022)

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<sup>1</sup> <https://www.environment.gov.au/protection/assessments/strategic/offshore-petroleum-greenhouse-gas>

- h. Procedures:
  - i. NOPSEMA Environment plan assessment standard operating procedure (N-04750-SOP1369)
  - i. Other relevant documents and records, including (but not limited to):
    - i. Relevant published, peer-reviewed scientific literature
    - ii. Department of the Environment, Water, Heritage and the Arts, Significant Impact Guidelines 1.1 – Matters of National Environmental Significance, EPBC Act Policy Statement (2013)
    - iii. Department of Sustainability, Environment, Water, Population and Communities, 'Indirect consequences' of an action: Section 527E of the EPBC Act, EPBC Act Policy Statement (2013)
    - iv. Department of the Environment and Energy, National Light Pollution Guidelines for Wildlife Including Marine Turtles, Seabirds and Migratory Shorebirds (2023)
    - v. Commonwealth of Australia, Recovery Plan for Marine Turtles in Australia 2017–2027 (2017)
    - vi. Commonwealth of Australia, Conservation Management Plan for the Blue Whale 2015–2025 (2015)
    - vii. Department of Agriculture, Water and the Environment, Guidance on key terms within the Blue Whale Conservation Management Plan (2021)
    - viii. Commonwealth of Australia, Threat Abatement Plan for the impacts of marine debris on the vertebrate wildlife of Australia's coasts and oceans (2018)
    - ix. Department of Sustainability, Environment, Water, Population and Communities, Marine Bioregional Plan for the North-west Marine Region (2012)
    - x. Director of National Parks, North-west Marine Parks Network Management Plan (2018)
  - j. Relevant legislative and other requirements that apply to the activity and are relevant to the environmental management of the activity
  - k. Relevant Federal Court of Australia authority and issued judgments