

Not reasonably satisfied decision

Prelude FLNG Environment Plan

This document provides notification of NOPSEMA's decision made under regulation 10 of the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 (Environment Regulations) that it is not reasonably satisfied that the environment plan meets the acceptance criteria set out in the regulations, and that the titleholder is provided an opportunity to modify and resubmit the plan.

Submission information

Titleholder¹:	Shell Australia Pty Ltd
Environment plan:	Prelude FLNG Environmental Plan (doc. no. 2000-010-G000-GE00-G00000-HE-5880-00002)
Petroleum title(s)/Application number(s):	WA-44-L; WA-2-IL
Date submitted to NOPSEMA:	18/01/2016
Activities type(s)²:	<ul style="list-style-type: none"> • Operation of a facility used for the recovery or processing of petroleum; • Construction or installation of a facility; • Decommissioning, dismantling or removing a facility; • Drilling.
Activity overview: <i>As described on the website environment plan.</i>	<p>The scope of this Environmental Plan includes FLNG arrival on-site, offshore works, hook-up and commissioning (HUC), start-up and the operate phase. This EP includes the FLNG facility itself, installation vessels and support vessels contracted for the offshore works and HUC activities, tug boats pulling the FLNG into Australian waters, and the support, supply, and in-field vessels required during the operate phase of the facility. The EP also includes transit of the support vessels and helicopter providing support to the FLNG operations within WA-44-L, well intervention activities using either a light well intervention vessel or a drilling rig, drilling for new production well/s, and wellhead removal of abandoned well Prelude 1-a.</p> <p>The Prelude FLNG Project is in WA-44-L, in Commonwealth marine waters, 200km offshore northwest Australia and 460km north-north east of Broome, in 237m from Mean Sea Level (MSL) water depth. The Prelude FLNG facility is planned to be towed from South Korea where it was constructed and partially commissioned. The installation, hook-up and commissioning is planned upon arrival of the FLNG, from then the facility will be ready for start-up (RFSU). The Prelude FLNG facility is designed to stay on location and operate for 25 years.</p> <p>The Prelude FLNG Project comprises of the Prelude FLNG and subsea equipment including production wells, xmas trees, manifolds, flowlines, riser</p>



base manifold, flexible risers and an umbilical and subsea distribution hardware providing hydraulics, power, communications and chemical services to the subsea wells and subsea manifolds. The Prelude FLNG development has one drill centre with two 6-slot manifolds, a base case 7 production wells located 3km south of the Prelude FLNG. The Prelude FLNG is connected to the gas reservoir via 12" flowlines and flexible risers routed to the turret.

The FLNG facility itself is approximately 488m long and 74m wide, and moored at the gas field location during the period of production. It is permanently moored during the operations phase, remaining on station during cyclones. The FLNG facility has been designed to withstand a 1 in 10,000-year weather event and with a field life of 25 years. The FLNG facility includes LNG, LPG and condensate storage as well as facilities for exporting these products to carriers. All reservoir, subsea control, processing, storage and loading functions are operated from the FLNG facility.

Infield support vessels will support the FLNG in station keeping during offloading of products, as well as provide Safety, Security and Emergency response support. Supply vessels will bring in materials and supplies into the facility and bring out wastes and supplies to and from Darwin Onshore Supply Base. Crew change will be via helicopter.

Drilling activities with the use of a mobile offshore drilling unit (MODU) or rig is anticipated during the life of the Prelude operations. Drilling may be required for new production wells or for well work-over.

Decision:	Not reasonably satisfied
Decision date:	17/02/2016
Resubmission due date³:	17/04/2016
Decision made by:	Representative of NOPSEMA: Environment Manager - Seismic & Production Operations

Basis of decision

NOPSEMA has assessed the environment plan in accordance with its assessment policies and procedures. On completion of assessment, NOPSEMA has decided that it is not reasonably satisfied that the environment plan meets the criteria below as set out in regulation 10A of the Environment Regulations:

- (a) is appropriate for the nature and scale of the activity
- (b) demonstrates that the environmental impacts and risks of the activity will be reduced to as low as reasonably practicable
- (c) demonstrates that the environmental impacts and risks of the activity will be of an acceptable level
- (d) provides for appropriate environmental performance outcomes, environmental performance standards and measurement criteria
- (e) includes an appropriate implementation strategy and monitoring, recording and reporting arrangements
- (g) demonstrates that:
 - (i) the titleholder has carried out the consultations required by Division 2.2A
 - (ii) the measures (if any) that the titleholder has adopted, or proposes to adopt, because of the consultations are appropriate.

Titleholder requirements

In accordance with regulation 10, the titleholder is required to modify and resubmit the environment plan. Upon resubmission of the plan, NOPSEMA will continue to assess the submission in accordance with its assessment policies and make a decision under regulation 10. After a titleholder has been provided with reasonable opportunity to modify and resubmit an environment plan, NOPSEMA will make a final decision on whether to accept or refuse to accept the environment plan.

How to get further information

If you have any further questions regarding the activity it is suggested you contact the titleholder's nominated liaison person for the activity.

If you would like to access any further information regarding this decision, or would like to contact NOPSEMA please email environment@nopsema.gov.au.

¹ A titleholder includes an applicant for a petroleum access authority, petroleum special prospecting authority, pipeline licence, greenhouse gas search authority or greenhouse gas special authority under sub-regulation 9(2).

² Activity type as listed in the Offshore Petroleum and Greenhouse Gas Storage (Regulatory Levies) Regulations 2004

³ NOPSEMA sets the proposed timeframe for resubmission; after which NOPSEMA may determine a reasonable opportunity has been given and NOPSEMA may refuse to accept the plan. Titleholders can request an extended timeframe.