



Woollybutt Environment Plan - Field Management

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). In this instance, NOPSEMA is providing an opportunity to modify and resubmit the environment plan as it is not reasonably satisfied that the plans meets the acceptance criteria set out in the regulations.

Submission information

Titleholder1:	ENI Australia Limited
Environment plan:	Woollybutt Environment Plan - Field Management, Rev 8, Document No. 000105-DV-PR.HSE.1011.000
Petroleum title(s)/Application number(s):	WA-25-L
Date submitted to NOPSEMA:	06/12/2016
Activities type(s)²:	<ul style="list-style-type: none"> • Other

Activity overview: *As described on the NOPSEMA website.* The Woollybutt Field is located approximately 80 km off the northwest coast of Western Australia in Lease Area WA-25-L. The Field is approximately 25 km west of the Barrow Island Marine Management Area and Marine Park boundary, and more than 50 km south-west of the proposed Montebello Commonwealth Island Marine reserve.

The Woollybutt Field is presently shut-in and will continue to be shut-in during field management activities. A summary of the proposed field management activities is outlined below.

1. Field Management Activities

Field management activities that may be undertaken in accordance with this EP include cathodic protection surveys and visual inspections; these are undertaken using remotely operated vehicles (ROV). The methods used by Eni are well understood and do not represent any novel techniques or equipment. Details of the frequencies and durations of field management activities are provided in Table 1.

Table 1: Proposed field management activities with indicative frequencies and durations

Activity	Frequency	Approx. Duration (days)
ROV Survey	Opportunistic – no more than once per year	3 – 7 days

1.1 ROV Surveys

Cathodic protection surveys and visual inspections of subsea structures will be undertaken using ROVs, deployed from a project vessel. Cathodic protection surveys are undertaken as part of an asset integrity program. Cathodic protection readings have remained consistent over the last three surveys conducted in 2010, 2014 and 2016.

1.2 Project Vessels

Project vessels will be selected based on the activity that will be undertaken. All project vessels will be commercial vessels with a suitable survey class for activities in the Operational Area. The maximum credible spill scenario for all project vessels is 100 m³ (volume of largest tank). All project vessels will run on marine diesel; no intermediate or heavy fuel oils will be used. Typical vessel specifications are detailed in Table 2.

Table 2: Typical vessel specifications

Parameter	Description
Draft (max)	3.25 (max)
Gross tonnage	1475 Gt
Hull	Steel hull
Fuel type	Marine diesel
Total fuel volume	138.2 m ³ (100%)
Volume of largest fuel tank	30.4 m ³

Decision:	Not reasonably satisfied
Decision date:	22/12/2016
Resubmission due date:	21 January 2017
Decision made by:	Representative of NOPSEMA: Environment Manager - Drilling & Developments

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:

(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

(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.