



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

Titleholder ¹ :	Roc Oil (WA) Pty Limited
Environment plan:	Cliff Head Field Offshore Operations Environment Plan, Revision 8, No. 10/HSEQ/ENV/PL01
Petroleum titles:	WA-31-L, WA-12-PL
Date submitted to NOPSEMA:	22/03/2017
Activities types ² :	 Operation of a facility used for the recovery or processing of petroleum Operation of a licensed petroleum pipeline Any other petroleum-related operations or works carried out under an instrument, authority or consent granted or issued under the OPGGSA

Activity overview:

As described on the NOPSEMA website.

Production from the Cliff Head Oil Field Development involves transferring oil and produced formation water (PFW) from the offshore wellhead to the Arrowsmith Stabilisation Plant (ASP) via the offshore and onshore pipeline. At ASP, the PFW is removed from the product stream, the crude oil is stabilised and then transferred to road tankers and transported for refining.

This Environment Plan considers only the offshore components of the Cliff Head development, namely those that occur beyond the Commonwealth-State boundaries at 3nm from the coastline, these are:

- An unmanned well head platform, Cliff Head Alpha (CHA) to accommodate the well heads and support equipment;
- Eight well heads with the current arrangement of five production wells with electrical submersible pumps (ESPs) to enable artificial lifting of the produced fluid (i.e. crude oil and water), and three water injection wells;
- An insulated subsea production pipeline, which transports the produced fluids from CHA to the onshore ASP;
- An insulated subsea water injection pipeline from ASP to the three injection wells at CHA; and
- A subsea power and communication cable, and chemical supply umbilical running from ASP to CHA.

The production pipeline transports the produced fluids from the CHA to the ASP where oil is separated from the PFW. The PFW is then transported via the water injection pipeline to the injection wells, where it is then injected into the geological formation that hosts the hydrocarbon reservoir.



	The offshore components of the pipelines that lie within Commonwealth waters are approximately 4.9 km in length and are operated under pipeline licence WA-12-PL, which is administered by National Offshore Petroleum Titles Administrator (NOPTA). The offshore components of the pipelines that lie within state waters (i.e. between the state waters limit and the mean low water mark) are approximately 6.9 km in length and are operated under pipeline licence TPL/18, which is administered by the Western Australian Department of Mines and Petroleum (DMP).
Decision:	Not reasonably satisfied
Decision date:	20/04/2017
Resubmission due date ³ :	20/05/2017
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:

- (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, and
- (e) includes an appropriate implementation strategy and monitoring, recording and reporting arrangements.

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.