

Woollybutt Field Management and Plug and Abandonment EP

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 Field Management and Plug and Abandonment Environment Plan (Document No. 000105_DV_PR.HSE.1011.000, Revision 12)
Petroleum title(s)/Application number(s):	WA-25-L
Date submitted to NOPSEMA:	05/11/2018
Activities type(s)²:	<ul style="list-style-type: none"> • Drilling • Other petroleum activities or works
Activity overview: <i>As described on the NOPSEMA website.</i>	<p>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.</p> <p>The Woollybutt Field is presently shut-in. The scope of the EP covers passive field management activities and P&A activities (including well intervention) on four to seven wells within permit WA-25-L. Field management activities that may be undertaken in accordance with this EP include cathodic protection surveys and visual ROV inspections. The methods used by Eni are well understood and do not represent any novel techniques or equipment. ROV surveys will be conducted at least annually until the wells are plugged, and each survey is 3-7 days in duration. Only one project vessel will be in the Operational Area at any one time undertaking field management. Plug and abandonment will take approximately 20-30 days per well and will be completed within 5 years of EP acceptance. The well intervention of WB4 may be completed prior to P&A if the opportunity arises and will take approximately 7-15 days. A maximum of three support vessels will be utilised to support the MODU during P&A activities. Only one project vessel</p>

will be in the Operational Area at any one time during well intervention activities. Project and support vessels will be selected based on the activity that will be undertaken. All vessels will be commercial vessels with a suitable survey class for activities in the Operational Area. All project vessels will run on marine diesel; no intermediate or heavy fuel oils will be used.

Decision:	Not reasonably satisfied
Decision date:	03/12/2018
Resubmission due date³:	01/02/2019
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:

- (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
- (h) complies with the Act and regulations.

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.