



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 :	Cooper Energy Limited
Environment plan:	BMG Well Abandonment (Phase 1) Environment Plan (Document No. BMG-EN-EMP-0002, Revision 0)
Petroleum title(s)/Application number(s):	VIC/RL13, VIC/RL14
Date submitted to NOPSEMA:	19/01/2018
Activities type(s) ² :	DrillingAny other petroleum activity
A ativity a secondary	

Activity overview:

As described on the NOPSEMA website.

Cooper Energy Limited (Cooper Energy) is the titleholder of Petroleum Retention Leases VIC/RL13 (Basker Field) and VIC/RL 14 (Manta Field) in the Gippsland Basin and are located approximately 55 km southeast of the Orbost Gas Plant on the Victorian coast (Figure 1 1). These permits along with the Gummy field (which is not the subject of this Environment Plan) are known as BMG.

BMG infrastructure (7 wells) has been in a non-production phase (NPP) since 2010. Cooper Energy intends to abandon the existing BMG infrastructure in two phases:

- Phase 1 Plug and abandon the existing Basker and Manta wells with removal of minor infrastructure items (covered under this Environment Plan);
- Phase 2 Installation support vessel (ISV) decommissioning of remaining seabed infrastructure (activity will be the subject of separate Environment Plan).

Activities are anticipated to commence mid- 2018 and take approximately 80 days to complete all activities, excluding weather and operational delays. During this period, any of the activities described in the EP may be undertaken, with normal operations conducted 24-hours a day.

Phase 1 Abandonment Program to be completed by a Mobile Offshore Drilling Unit (MODU) (Ocean Monarch) within a 500 m exclusion zone and 2 km operational area.



Activities included in the scope of the EP include:

- Pre-lay of MODU moorings;
- Disconnection and laydown of infield flowlines and service lines from the wells;
- Plug and abandonment of the BMG Wells; and
- Drilling and removal of subsea trees and wellheads.
- Activities excluded from the scope of this EP are:
- Decommissioning / removal of infield flowlines and pipelines (Phase 2 abandonment);
- Vessels / MODUs transiting to or from the operational area. These
 vessels are deemed to be operating under the Commonwealth
 Navigation Act 2012 and not performing a petroleum activity.

The MODU will be towed to location where it will be moored prior to commencing activities. Anchors may be placed on the seabed and tested by the support vessels prior to the MODU arriving. Eight anchors will be required, with each having a footprint of approximately 30 m2. Each anchor is connected to large chain (83 mm) which runs along the seabed towards the MODU for approximately 1100 m before rising towards the MODU. A 500-m exclusion zone will be in place around the MODU for the duration of the activities.

The MODU will be supported by two or three anchor handling, tow and support (AHTS) vessels. One vessel will remain on standby and in attendance to the MODU throughout the workover program.

Decision:	Not reasonably satisfied
Decision date:	14/02/2018
Resubmission due date ³ :	16/03/2018
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.