

# WA-49-L Gemtree Exploration Drilling Environment Plan

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## 1. Purpose of this report

NOPSEMA has accepted the WA-49-L Gemtree Exploration Drilling Environment Plan (the EP) submitted by Woodside Energy Julimar Pty Ltd (the titleholder) for an exploratory drilling activity in the North West region within the period 2021 to 2024.

As required by the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 (the Environment Regulations), the public was provided with an opportunity to comment on the EP. After this period, Woodside Energy Julimar Pty Ltd took into account public comments and prepared a Report on Public Comment which is published on NOPSEMA's website<sup>1</sup>.

Following the public comment period, Woodside Energy Julimar Pty Ltd submitted the EP for assessment by NOPSEMA on 3 July 2020. NOPSEMA has since completed its assessment of the EP and has determined that it is satisfied that the EP meets the criteria for acceptance<sup>2</sup> on 17 of September 2020.

This report explains how NOPSEMA took into account comments received from the public during the public comment period in making its decision<sup>3</sup>. This report also contains other key matters that may be of interest to the public.

This report accompanies the accepted WA-49-L Gemtree Exploration Drilling Environment Plan, Revision 1 submitted by Woodside Energy Julimar Pty Ltd, which is available on the NOPSEMA website and should be referred to for further information.

### 1.1. Information relevant to NOPSEMA's decision:

In making the decision to accept this EP, NOPSEMA took into account:

- the Environment Regulations;
- NOPSEMA Assessment Policy (PL0050), Environment Plan Assessment Policy (PL1347) and Environment Plan Decision Making Guidelines (GL1721);
- the WA-49-L Gemtree Exploration Drilling Environment Plan, which includes the Woodside Energy Julimar Pty Ltd Oil Pollution Emergency Plan made up of three components; Oil Pollution Emergency

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<sup>1</sup> Woodside Energy Julimar Pty Ltd report on public comments – WA-49-L Gemtree Exploration Drilling Environment Plan - Public Comment Report [dated July 2020]

<sup>2</sup> Environment Regulations, Regulation 10A Criteria for acceptance of environment plan

<sup>3</sup> Environment Regulations, Regulation 11(2A) Publication of notice, etc.

Arrangements, WA-49-L Gemtree Exploration Drilling Oil Pollution First Strike Plan and the Oil Spill Preparedness and Response Mitigation Assessment for WA-49-L (OSPRMA - Appendix D of the EP);

- the information raised by relevant persons, government departments and agencies that is relevant to making a decision;
- the information raised through public comment that is relevant to making a decision;
- There was one public comment submission received during the public comment period which related to the increased risk profile and management measures in place to deal with COVID-19;
- relevant plans of management and threatened species recovery plans developed under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and relevant guidance published by the Department of Agriculture, Water and the Environment.

## 2. Next steps

Responsibility for the ongoing environmental performance of the exploratory drilling activity remains, at all times, with Woodside Energy Julimar Pty Ltd.

NOPSEMA has legislated responsibilities to inspect and investigate offshore petroleum and greenhouse gas storage activities, and to enforce compliance with environmental law. These functions will be applied to this activity in accordance with NOPSEMA's policies.

## 3. Sensitive information

Sensitive information received during the public comment period, such as the names and contact details of commenters and specific information identified by the commenter or relevant person as 'sensitive', is not published in this report. Sensitive information is contained in a sensitive information part of the EP which has been considered by NOPSEMA during its assessment process.

## 4. Further information

If you would like further information about the activity, please contact the titleholder's nominated liaison person specified in the EP and on NOPSEMA's webpage for the WA-49-L Gemtree Exploration Drilling Environment Plan.

If you would like to be notified of regulatory information on the activity, such as start and end dates and enforcement actions (if any), please subscribe to updates via NOPSEMA's website.

## How NOPSEMA has taken into account key matters raised during public comments, the assessment and decision making process for the WA-49-L Gemtree Exploration Drilling EP

| # | Issues raised and Key Matters   | Titleholder response  | NOPSEMA's assessment and decision   |
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| 1 | <p><b>Issue raised:</b><br/>Due to the global spread of corona virus (COVID-19) a risk assessment should be included along with controls on dealing/managing the spread.</p> <p><b>Claim:</b><br/>Due to the nature of the highly contagious virus, if an outbreak were to occur this would increase the risk to operations considerably thereby increase the risk on the operating environment. Preventative measures / checks should be in place.</p> | <p>Woodside notes the feedback provided requesting information on management measures related to COVID-19.</p> <p>Note that the EP's scope excludes the health management aspect and this is typically addressed by the drilling rig operator's Safety Management System as part of the Vessel Safety Case. Drilling rigs operate under a Safety Case regime as required by the Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2009, which is premised on a set of defined operating conditions and subsequent risk management process. This process is administered by NOPSEMA Safety who reviews and accepts the adequacy of management system and framework addressing the health management of the workforce, including infectious disease such as COVID19.</p> <p>Specific to COVID19, Woodside updated its operational sites and facility access controls and restrictions to protect the health and safety of employees, contractors and service providers, aligning World Health Organisation, Commonwealth, State and local advice and guidance.</p> <p>In support of this, Woodside formally notified all contractors and service providers, including drilling</p> | <p>NOPSEMA recognises that the COVID-19 pandemic presents challenges to the offshore energy industry in terms of protecting offshore worker health and ensuring offshore activities can continue in a safe and environmentally responsible manner.</p> <p>In making a decision regarding this matter, NOPSEMA took into account the titleholder's response, NOPSEMA's COVID-19 Compliance Strategy and the Australian Petroleum Production and Exploration Association's (APPEA) national COVID-19 response principles and protocols.</p> <p>As part of the COVID-19 Compliance Strategy, NOPSEMA has undertaken a number of initiatives (including conducting remote inspections) to ensure that appropriate risk assessments and where necessary, alternative control measures' have been implemented. The results of this work is summarised on NOPSEMA's website on the dedicated <a href="#">COVID 19 page</a>.</p> <p>The remote inspection of Woodside was undertaken in April-May 2020. The inspection team observed that Woodside had completed a risk assessment for commitments against each oil</p> |

rig contractors, they must maintain their own COVID-19 Management Plan to guide and manage their employees. The COVID-19 Management Plan is complementary to any existing infectious disease management plans contractors and service providers currently have in place.

Woodside has undertaken a detailed assurance process to assess the impacts of COVID-19 on the Woodside arrangements in place to respond to a potential environmental incident, specifically a hydrocarbon loss of containment, across its operations. Woodside has determined that in the event of an environmental incident that hydrocarbon spill response can be executed as outlined in the Environment Plan.

As health management, including infectious diseases such as COVID19, is addressed through the drilling rig operator's Safety Management System no updates have been made to the Environment Plan.

spill response strategy and this had been tested with service providers. Woodside conducted this assessment ahead of work conducted by the APPEA Oil Spill Response Working Group (OSPRWG) and was also contributing to the work of the group.

The APPEA OSPRWG and the Drilling Industry Safety Committee Source Control Working Group (WG) have also undertaken work to demonstrate that any spill response / source control activities can be conducted in a timely and effective manner while also minimising COVID-19 risks to the broader Australian community.

The response from Woodside confirms that an assurance process has been completed, to assess the impacts of COVID-19 on the arrangements in place to respond to a potential environmental incident. In addition, actions and inspections undertaken by NOPSEMA and the work completed by APPEA have confirmed that Woodside has appropriate control measures and procedures in place to be able to respond to an environmental incident.

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| <p><b>2</b> Key matter: Hydrocarbon Spill risks have been reduced to as low as reasonably practicable</p> | <p>Woodside provided information about hydrocarbon spill risks in Section 6.7 of the EP. Section 6.7.1 and the Oil Spill Preparedness and Response Mitigation Assessment (OSPRMA) Section 2.3 detail Woodside's approach to spill modelling and outcomes of stochastic modelling are applied to define the environment that may be affected (EMBA).</p> | <p>NOPSEMA acknowledges the importance of ensuring that the risks associated with a hydrocarbon spill are reduced to as low as reasonably practicable and that in the (extremely unlikely) event of a spill, appropriate control measures are in place to ensure a timely response.</p>   |
|   | <p>Control measures for reducing the likelihood of a hydrocarbon spill are included in Sections 6.7.2, 6.7.3 and 6.7.4 of the EP.</p>   | <p>In making a decision regarding this matter, NOPSEMA took into account the content of the EP, NOPSEMA's Decision Making Guidelines (GL1721), NOPSEMA's Environment Plan content requirements (GN1344), NOPSEMA's Oil pollution risk management guidance note (GN1488) and NOPSEMA's Oil Spill Modelling Environment Bulletin.</p>   |
|   | <p>Woodside's spill response needs, capability and ALARP assessment for this activity is detailed in Appendix D of the EP which is the OSPRMA. Control measures to manage the impacts and risks of a response are detailed in the OSPRMA Section 7.</p>   | <p>Given the information provided in the EP, NOPSEMA is satisfied that the details and evaluation of impacts and risks of hydrocarbon spills is appropriate to the nature and scale of the spill risks. In addition, the proposed control measures for reducing the impacts and risks of a spill and arrangements and capability for responding to a spill incident, if it did occur, are considered appropriate and ALARP.</p> |

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| <p><b>3</b> Key matter: There is potential for unacceptable impacts to marine turtles from light emissions. The operational area intersects with flatback turtle inter-nesting habitat critical and a flatback turtle inter-nesting Biologically Important Area (BIA).</p> | <p>Woodside has evaluated the impact of light emissions from the activity in Section 6.6.9 of the EP.</p> | <p>NOPSEMA recognises that there is the potential for the activity, if not appropriately managed, to have an unacceptable impact on marine turtles.</p> <p>In making a decision regarding this matter, NOPSEMA took into account the content of the EP, NOPSEMA's Decision Making Guidelines (GL1721) and the Recovery Plan for Marine Turtles in Australia.</p> <p>Although the operational area intersects with the flatback turtle inter-nesting BIA and habitat critical, the nearest nesting beaches are approximately 55km away at the Montebello Islands. Also, the water depths at the operational area are between 166m and 511m and it is expected that flatback turtles are more likely to be present at shallower depths (&lt; 70m) and closer to nesting beaches.</p> <p>An evaluation of light emissions in the EP indicates that based on the height of the derrick on the rig (50m above sea level), the distance that direct light is considered visible is 25km from the rig. As a result, light from the MODU will not be visible at the nearest nesting beaches.</p> <p>NOPSEMA has concluded that the activity will not cause unacceptable impacts to flatback turtles and is not inconsistent with the Recovery Plan for Marine Turtles in Australia.</p> |
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| <p><b>4</b> Key matter: There is potential for unacceptable impacts to blue whales from acoustic / noise emissions. The operational area intersects the pygmy blue whale migration Biologically Important Area (BIA).</p> | <p>Woodside has assessed the effects of noise from vertical seismic profiling (VSP) in Section 6.6.3 of the EP and from support vessels, MODU, positioning equipment and helicopter transfers in Section 6.6.4.</p> | <p>NOPSEMA recognises that there is the potential for the activity, if not appropriately managed, to have an unacceptable impact on blue whales.</p> <p>In making a decision regarding this matter, NOPSEMA took into account the content of the EP, NOPSEMA's Decision Making Guidelines (GL1721) and the Conservation Management Plan for the Blue Whale.</p> <p>Given the proposed control measures to be applied during the VSP activity, the distance to the pygmy blue whale foraging area (226km) and the magnitude and duration of the noise sources (for example VSP will be over a 24 hour period only), NOPSEMA is satisfied that there will be no injury to blue whales utilising their migration BIA or displacement of blue whales from a foraging area.</p> <p>NOPSEMA has concluded that the activity will not cause unacceptable impacts to blue whales and is not inconsistent with the Conservation Management Plan for Blue Whales.</p> |
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