

# *Woollybutt field management, plug and abandonment and equipment removal*

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## **1. Purpose of this report**

NOPSEMA has accepted the Woollybutt Field Management, Plug and Abandonment and Equipment Removal environment plan (the EP) submitted by Eni Australia Limited (Eni; the titleholder) for a field management, plug and abandonment and equipment removal activity within the period(s) Q3 2021 to Q4 2022.

In December 2020, Eni were issued General Direction 805 by NOPSEMA under Section 574 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (OPGGs Act). NOPSEMA issued the General Direction given that in NOPSEMA's opinion, the titleholders had not taken adequate action to remove property since production activities ceased at Woollybutt field in 2012. The General Direction requires that the titleholders abandon the wells by 31 December 2021, remove all property and undertake any remediation activities by 31 December 2022. This EP addresses the direction to abandon wells and remove some property. A further decommissioning EP addressing the remaining matters in the General Direction is proposed to be submitted to NOPSEMA in Q3 of 2021.

This report explains how NOPSEMA took into account key matters raised by relevant persons in making its decision to accept the EP that may be of interest to the public.

This report accompanies the accepted Woollybutt Field Management, Plug and Abandonment and Equipment Removal, revision number 17.0, submitted by Eni, 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);
- NOPSEMA Section 572 regulatory Policy (PL1903);
- General Direction 805 issued under Section 574 of the OPGGS Act to Eni in December 2020
- the Department of Industry, Science, Energy and Resources' Offshore Petroleum Decommissioning Guideline;
- the Woollybutt Field Management, Plug and Abandonment and Equipment Removal environment plan which includes the titleholder's Oil Spill Emergency Plan and Operational and Scientific Monitoring Plan;
- the information raised by relevant persons, government departments and agencies that is relevant to making a decision;



- 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 the Environment, Water and Energy.

## 2. Next steps

Responsibility for the ongoing environmental performance of the activity remains, at all times, with the titleholder.

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 gathered during consultations, such as the names and contact details of relevant persons, 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 Woollybutt Field Management, Plug and Abandonment and Equipment Removal.

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 from the [Industry environment plans \(nopsema.gov.au\)](#) page on NOPSEMA's website.

## How NOPSEMA has taken into account key matters raised in the assessment and decision-making process for Woollybutt field management, plug and abandonment and equipment removal activities

Matter	Titleholder response	NOPSEMA's assessment and decision
<p><b>Potential risk to future marine users from the presence of petroleum wells and associated equipment and property</b></p>	<p>The activity involves the abandonment of all wells, removal of wellheads and some other equipment and property including the disconnectable single point mooring system (DSPM) from the Woollybutt field using an intervention vessel or MODU.</p> <p>Eni identified that during the abandonment of the Corkybark-1 well in 2000, technical issues were encountered when the drill pipe became stuck and could not be recovered. As a result, the proposed activity seeks to leave the Corkybark-1 wellhead and guide base in situ. Eni will remove all other wellheads as part of abandonment activities.</p> <p>Eni provided an evaluation for leaving the Corkybark-1 wellhead and guide base in situ, considering the risks to other marine users and found the impacts and risks are acceptable and as low as reasonably practicable (ALARP) for the following reasons:</p> <ul style="list-style-type: none"> <li>• The wellhead intersects an area of the Pilbara Trawl Fishery that has been closed to fishing since 1998</li> <li>• The area of potential displacement equates to a 500m area or &lt;0.015% of the Zone 1 Pilbara Trawl Fishery which is closed</li> <li>• In the unlikely event of a fishing net snagging on the protrusion, the pulling force on the trawl vessel is</li> </ul>	<p>NOPSEMA recognises the importance of ensuring oil and gas operators meet their decommissioning obligations as required under section 572 of the OPGGS Act.</p> <p>It is acknowledged that all wells are proposed to be abandoned in accordance with a Well Operations Management Plan (WOMP) accepted by NOPSEMA. All wellheads will be removed from the field except Corkybark-1, where Eni is seeking to deviate from the requirement to remove property due to technical complexities. NOPSEMA recognises that an alternative to full removal may be considered under section 572(7) when the EP demonstrates that the proposed deviation delivers equal or better environmental outcomes compared to complete property removal and impacts and risks are acceptable.</p> <p>During the EP assessment, NOPSEMA required Eni to provide further evaluation to demonstrate leaving the wellhead insitu presented acceptable risks and would provide an equal or better environmental outcome. In response, Eni conducted further evaluation of control measures and undertook further consultation with relevant persons (Department of Primary Industries and Regional Development and Western Australian Fishing Industry Council) on possible engineering control measures such as rock dumping or placing an over-trawlable structure over the wellhead.</p> <p>NOPSEMA considered the evaluation in the EP and advice from relevant persons that indicated these control measures may lose effectiveness, potentially posing a greater risk over time as they deteriorate, and</p>

	<p>unlikely to cause a vessel rollover due to the types of vessels used by the Pilbara Trawl Fishery</p> <ul style="list-style-type: none"> <li>• Administrative control measures of providing notice to mariners of the property in the field and inclusion on navigational charts are considered effective by relevant persons considering technology used on trawl vessels to detect and avoid seabed obstacles.</li> </ul>	<p>relevant persons preference for administrative control measures in this instance.</p> <p>After considering the negligible fishing effort in the area, unlikely consequence of vessel rollover occurring, technical complexities and risks associated with removal of Corkybark-1 wellhead, proposed control measures, NOPSEMA is satisfied that the EP demonstrates that the proposed deviation to full removal of Corkybark-1 wellhead delivers equal or better environmental outcomes.</p> <p>In making a decision regarding this matter, NOPSEMA took into account the EP, the proposed submission and acceptance of a WOMP for abandoning the wells, General Direction 805, relevant scientific literature, views expressed by relevant persons, requirements of section 572 of the OPGGS Act and NOPSEMA's Decision Making Guidelines (GL1721).</p>
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