

Mutineer-Exeter Cessation of Production Environment Plan

1. Purpose of this report

NOPSEMA has accepted the Mutineer - Exeter Cessation of Production Environment Plan (revision 4, dated 17/2/2022) (the EP) submitted by Santos Ltd (the titleholder) for the removal of floating property, the presence of property within title areas WA-26-L, WA-27-L and WA-54-L and the inspection and maintenance of this property until further decommissioning work is completed. The activity will be undertaken in the North-West region of Australia over the 2022 to 2025 period.

In September 2021, NOPSEMA requested that Santos Ltd, submit a revision of the EP for the Mutineer Exeter cessation of production activity. This was requested as the Mutineer Exeter field ceased production in 2018 and floating infrastructure [disconnectable turret mooring (DTM) and two mid water arches (MWAs)] remains in the field following cessation of production.

NOPSEMA's Decommissioning Compliance Strategy (which was published in 2021) sets a target for floating or buoyant property to be removed within 12 months of cessation of production.

This EP was submitted in December 2021, to address NOPSEMA's request for the EP to be revised and include the removal of the floating infrastructure as a priority.

This report explains how NOPSEMA took into account matters that may be of interest to the public and accompanies the accepted EP submitted by Santos 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);
- NOPSEMA Section 572 regulatory Policy (PL1903)
- the Department of Industry, Science, Energy and Resources (DISER) Guideline: Offshore petroleum decommissioning
- the Mutineer – Exeter Cessation of Production Environment Plan which includes the titleholder's Oil Pollution Emergency 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 Agriculture, Water and the Environment.

2. Next steps

Responsibility for the ongoing environmental performance of the activity remains, at all times, with Santos 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 consultation 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 Mutineer – Exeter Cessation of Production activity.

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](#) page on NOPSEMA's website.

How NOPSEMA has taken into account key matters raised during the assessment and decision making process for Mutineer – Exeter Cessation of Production EP

#	Matter	Titleholder response	NOPSEMA's assessment and decision
1	Inadequate integrity and decommissioning arrangements for property brought onto the title which may preclude future removal options.	<p>The activity described in this Cessation of Production EP involves:</p> <ul style="list-style-type: none"> • The continued presence of all infrastructure on title and in the water column, until it is decommissioned • Undertaking inspection, maintenance and repair tasks until all wells are plugged and abandoned and subsea infrastructure is decommissioned • Removal of the DTM and two MWAs (referred to as floating infrastructure). <p>Production from the Mutineer, Exeter, Fletcher and Finucane (MEFF) fields ceased in 2018. At this time hydrocarbons were flushed from the production system with treated seawater and left in a preservation state. The EP describes the property currently present in the titles and the status of this property. Santos have indicated that the decommissioning planning for the floating infrastructure has been brought forward and this EP has been revised to include the removal of the floating infrastructure.</p> <p>The EP also describes decommissioning phases for all the infrastructure in the MEFF field with timing as follows:</p> <ul style="list-style-type: none"> • Floating infrastructure removal will commence in Q4 2022 and be completed by the end of 2022 • Well plug and abandonment work is planned to commence in Q4 2023 and take around 12 months to complete. • Decommissioning of subsea infrastructure will commence in the second half of 2024 and is planned to be completed by the end of 2025. 	<p>NOPSEMA recognises the importance of ensuring oil and gas operators meet their decommissioning obligations as required under Sect 572 of the OPGGS Act.</p> <p>During the course of the assessment, NOPSEMA required Santos Ltd to provide further information on the disposal of the DTM and MWA's and to clarify suitability of reusing the floating assets for offshore reuse / repurposing (via reefing). The potential for reefing the DTM and MWA's was included in Revision 3 of the EP submitted in December 2021. In response, Santos confirmed that reuse / repurposing was no longer included in the EP and the floating infrastructure will be disposed or recycled onshore using licensed contractors and waste facilities in accordance with relevant legislation.</p> <p>NOPSEMA requested further information on the decommissioning methodology to ensure that there will not be an increased risk of hydrocarbons being released from the field. In response, Santos confirmed that the cutting of the spools will not be undertaken until after the wells have been plugged and abandoned. Also blind flanges or plugs will be installed in the risers once these have been</p>

		<p>To facilitate this and provide additional details on the decommissioning program, Santos have committed to provide two additional EPs by no later than the 31 August 2022 that cover:</p> <ul style="list-style-type: none"> • The plugging and abandonment of all wells on the title; and • The proposed subsea equipment decommissioning activities for all the remaining property on the titles (such as the flowlines, umbilicals and manifolds). <p>In 2021, Santos undertook an inspection campaign which assessed the condition of the infrastructure. The cathodic protection checks demonstrated the integrity of the infrastructure until at least the end of 2026. The EP indicates that inspection, maintenance and repair tasks will continue to be undertaken so as not to preclude the future removal of subsea infrastructure. The next inspection campaign will be undertaken in 2023.</p> <p>The EP describes that the floating infrastructure will be disconnected from the risers and mooring chains, secured to a vessel for towing to port and transported for disposal or recycling at an onshore facility. Additional information on the disconnection and towing procedures will be included in the Safety case submitted to NOPSEMA prior to the execution of the activity.</p> <p>Santos concluded that the impacts and risks of the activity, with control measures in place such as implementing the MEFF subsea integrity management system, will be managed to ALARP and be of an acceptable level.</p>	<p>disconnected from the DTM and MWA's. As a result, the system will maintain the same number of barriers (for hydrocarbon containment) following the disconnection and removal of the floating infrastructure.</p> <p>After taking into consideration the information provided in the EP, NOPSEMA has concluded that the property brought onto the title is being managed to ALARP and acceptable levels and due to ongoing inspections and management, future removal options will not be precluded</p> <p>In addition, NOPSEMA is satisfied that appropriate decommissioning of the DTM, MWA's and remaining subsea infrastructure will be undertaken by Santos. Santos has prioritised the removal of the DTM and MWA's and will complete this by the end of 2022. Santos has also made commitments regarding the timeframes for plugging wells and decommissioning the remaining property on the title and submitting EPs for these activities by 31 August 2022.</p>
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