

BMG Closure Project Phase 1 Well Plug and Abandonment

1. Purpose of this report

NOPSEMA has accepted the BMG Closure Project (Phase 1) Environment Plan, Revision 1, dated 10 March 2022, (the EP) submitted by Cooper Energy Limited (Cooper; the titleholder) for a decommissioning/drilling activity in the Gippsland Basin within the period 2023 to 2024.

The titleholder submitted the EP for assessment by NOPSEMA on 26 November 2021. NOPSEMA has since completed its assessment of the EP and has determined that it is satisfied that the EP meets the criteria for acceptance¹ on 11 April 2022.

Decommissioning of the BMG facilities will involve the following phases, with timings planned to align with that required by General Direction 824:

- Phase 1
 - Seabed and facility inspection and preparatory activities;
 - Plugging and abandonment of all wells to permanently isolate the production zones (by end 2023)
 - Removal of structures on the seabed, flowline jumpers and flying leads; and
- Phase 2 (to be covered by a separate EP)
 - Decommissioning of flowlines and umbilicals and any other remaining equipment via full removal (base case) or alternative in-situ option subject to regulatory acceptances (by end 2026). This will be undertaken as a separate campaign following well P&A.

This report explains how NOPSEMA took into account matters that may be of interest to the public and accompanies the accepted BMG Closure Project (Phase 1) Environment Plan, Revision 1, dated 10 March 2022, submitted by Cooper, 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 BMG Closure Project (Phase 1) Environment Plan, Revision 1, dated 10 March 2022, and the titleholder's Oil Spill Emergency Plan and Operational and Scientific Monitoring Plan titled 'BMG Closure Project (Phase 1) Oil Pollution Emergency Plan', Revision 1, dated 10 March 2022,;
- the information raised by relevant persons, government departments and agencies that is relevant to making a decision;

¹ Environment Regulations, Regulation 10A Criteria for acceptance of environment plan

- 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 and Energy.
- Relevant scientific literature for example but not limited to:
 - DAWE (2021) Guidance on key terms within the Blue Whale Conservation Management Plan, September 2021. Available at: <https://www.awe.gov.au/environment/epbc/publications/guidance-key-terms-blue-whale-conservation-management-plan>
 - DoE (2015) Conservation Management Plan for the Blue Whale—A Recovery Plan under the Environment Protection and Biodiversity Conservation Act 1999, Commonwealth of Australia
 - McCauley RD, Gavrilov AN, Jolliffe CD, Ward R and Gill PC (2018) Pygmy blue and Antarctic blue whale presence, distribution and population parameters in southern Australia based on passive acoustics. *Deep-Sea Research Part II* 157– 58 (2018) 154-168
 - NOPSEMA (2021) Blue Whale Conservation Management Plan – frequently asked questions, 12 November 2021. Available at: <https://www.nopsema.gov.au/blue-whale-conservation-management-plan-faqs>

2. Next steps

Responsibility for the ongoing environmental performance of the BMG Closure Project (Phase 1) decommissioning/drilling activity remains, at all times, with Cooper.

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

BMG Closure Project Phase 1 Well P&A .

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 https://info.nopsema.gov.au/under_assessment/search_subscriptions/new on NOPSEMA's website.

How NOPSEMA has taken into account key matters during the assessment and decision-making process for BMG Closure Project (Phase 1) EP

#	Matter	Titleholder response	NOPSEMA's assessment and decision
1	Without adequate management, noise generated by the activity would potentially cause unacceptable impacts to blue whales within a blue whale foraging biologically important area (BIA)	<p>The activity involves seabed and facility inspection and preparatory activities, plugging and abandonment of all wells to permanently isolate the production zones, and removal of structures on the seabed, flowline jumpers and flying leads. A vessel using dynamic positioning (DP) will be used for inspection, maintenance and repair (IMR) activities and a mobile offshore unit (MOU; either heavy well intervention vessel or mobile offshore drilling unit) for the plugging and abandonment of wells.</p> <p>The activity is within a blue whale foraging BIA, with the area of overlap classified as a Possible Foraging Area in the Conservation Management Plan for the Blue Whale (CMP; DoE 2015), where evidence for feeding is based on limited direct observations or through indirect evidence, such as the occurrence of krill in close proximity of whales, or satellite tagged whales showing circling tracks.</p> <p>The evaluation of impacts to blue whales has been supported by site-specific acoustic modelling undertaken by an independent expert using relevant inputs from the activity and appropriate acoustic thresholds for low frequency cetaceans.</p>	<p>NOPSEMA recognises that there is the potential for the activity, if not appropriately managed, to have unacceptable impacts 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), the CMP, guidance on key terms within the Blue Whale Conservation Management Plan (DAWE 2021), Blue Whale Conservation Management Plan – frequently asked questions (NOPSEMA 2021), and relevant scientific literature.</p> <p>During the course of the assessment, NOPSEMA required changes and further information regarding how MOU activities could be undertaken in a manner not inconsistent with the CMP. In response, Cooper adopted a seasonal exclusion for the period in which contemporary literature indicates blue whale presence within the possible foraging area is most likely (April–June inclusive, e.g. McCauley et al. 2018).</p> <p>For any IMR activities undertaken during April–June, NOPSEMA required Cooper to adopt</p>

		<p>The acoustic modelling results outline the predicted distances to effect for temporary threshold shift (TTS), permanent threshold shift (PTS) and behavioural response threshold for different operational scenarios (EP Section 6.5 and Appendix 5).</p> <p>To manage impacts and risk to blue whales to ALARP and acceptable levels, Cooper has committed to a seasonal exclusion of the MOU activities between April and June inclusive to minimise overlap with the period in which blue whales are most likely to be observed in the area. In addition, Cooper has committed to a range of whale monitoring and management response measures that will be implemented for the duration of the activity (EP, Section 9.9).</p>	<p>adequate mitigation measures to demonstrate that the activity could be undertaken in a manner not inconsistent with the CMP. In response, Cooper revised the marine mammal adaptive management plan to include suitable monitoring and management measures for blue whales.</p> <p>After taking the information provided above into consideration, including the likely presence of blue whales within the area that may be affected by noise and Cooper's marine mammal adaptive management plan, NOPSEMA is reasonably satisfied that the activity will be managed in a manner not inconsistent with the CMP and will not result in unacceptable impacts to blue whales.</p>
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