*Woollybutt Decommissioning Environment Plan*

Key matters report

# Purpose of this report

NOPSEMA has accepted Revision 4 of the Woollybutt Decommissioning Environment Plan (the EP) submitted by Eni Australia Ltd (the titleholder) for the removal of Woollybutt subsea infrastructure in the North-West region of Australia. The activity is proposed for 2022.

Decommissioning of the Woollybutt facilities includes the removal for onshore disposal of the following subsea infrastructure and the leaving in-situ of buried mooring anchors and some sections of buried mooring lines:

* 10 Umbilicals and jumpers combined 8.3km length
* 4 flexible flowlines, 4 jumpers and 4 flexible risers combined 20.1km
* 8 concrete mattrasses
* 16 grout bags

This report explains how NOPSEMA took into account matters that may be of interest to the public and accompanies the accepted EP submitted by Eni Australia Ltd, which is available on the NOPSEMA website and should be referred to for further information.

## 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 Woollybutt Decommissioning Environment Plan Revision 4;
* the information raised by relevant persons, government departments and agencies that is relevant to making a decision; and
* 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;

# Next steps

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

# 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.

# 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 Decommissioning 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](https://info.nopsema.gov.au/) page on NOPSEMA’s website.

How NOPSEMA has taken into account key matters raised the assessment and decision-making process for the Woollybutt Decommissioning Environment Plan

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| # | Matter | Titleholder response | NOPSEMA’s assessment and decision |
| 1 | The safe and environmentally responsible removal of, or otherwise satisfactorily dealing with, infrastructure from the offshore area that was previously used to support oil and gas operations.  | The Woollybutt facility ceased production operations in 2012. Eni commenced detailed planning and consultation with relevant persons on the decommissioning of the Woollybutt subsea infrastructure in 2021. Following a comparative assessment workshop in 2021 with stakeholders, Eni determined that the preferred decommissioning end state was to leave the infrastructure in-situ. This was primarily based on the premise that habitat had grown on the infrastructure and the benefits this provided to commercial fishing activities and the short term environmental impacts and risk posed by the removal activities. Following NOPSEMA request to modify the EP, Eni changed the activity to propose the removal of all the Woollybutt infrastructure consisting of flexible flowlines, jumpers, flexible risers, umbilicals, mattresses, and grout bags for onshore disposal (with the exception of buried mooring anchors and line which is to be left in-situ).Eni have assessed options to remove the flexible flowlines and jumpers and the electrohydraulic umbilicals. These include cutting property on the seabed and recovering or recovering and cutting on the intervention vessel. The specific methodology is to be determined by the length of the flowline or umbilical. The remaining concrete mattresses and grout bags are to be recovered by claw grab and placed into a subsea basket which is then brought to the vessel. Mooring chain which are exposed on the seabed are to be cut at the first buried link and recovered by an anchor handling tug.The EP assesses the impacts and risks for each of the removal methodologies. Eni concluded that with control measures in place such as notifying relevant stakeholders prior to the commencement of activities; and implementing a waste disposal management plan, the impacts and risks will be managed to as low as reasonably practicable (ALARP) and be of an acceptable level.  | NOPSEMA recognises the importance of ensuring oil and gas operators meet their decommissioning obligations as required under Section 572 of the OPGGS Act. When the EP was initially submitted in 2021, Eni proposed that the Woollybutt subsea infrastructure be left in-situ. During the course of the assessment, NOPSEMA requested further information relating to the acceptability of leaving all infrastructure in-situ and noted: * The requirement for infrastructure to be removed when no longer in use nor to be used in connection with operations (Section 572(3) of the OPGGSA).
* The potential impacts from the long-term degradation of flexible flowlines and umbilicals which may result in the release of plastics and other contaminants to the marine environment.
* Uncertainty on the stability of the infrastructure in extreme weather conditions and as it degrades over time.
* Uncertainty of the benefits of the infrastructure to provide a suitable habitat for marine life given it is expected that this will bury over time and/or corrode.
* A need for thorough consultation with relevant stakeholders to demonstrate that they have been provided with sufficient information and time.

Given the uncertainty and potential long term impacts and in recognition of the requirement to remove infrastructure as the base case, NOPSEMA required Eni to reconsider the rejected control measure of removing all infrastructure. Following NOPSEMA’s request for further information, Eni undertook further consultation with stakeholders, completed further studies, and revised the EP to propose the removal of all the Woollybutt subsea infrastructure with the exception of the buried mooring anchors and some sections of mooring line. NOPSEMA has noted that the removal of the flexible flowlines and umbilicals will be by one of the two methods described in the EP. NOPSEMA has concluded that the process for determining the removal method is reasonable given selection is to be informed by further studies, and a consideration of technical feasibility, safety risks and environmental impacts. Further, it is noted that removal activities will be the subject of a Safety Case which must be submitted and accepted by NOPSEMA prior to the commencement of activities. The EP has also addressed indirect impacts and risks associated with the management and disposal of waste material generated from the removal activities. To ensure these impacts and risks are adequately managed, control measures such as implementing a waste management plan which applies the hierarchy of waste management principle has been adopted. After taking into consideration the information provided in the EP, NOPSEMA has concluded that the decommissioning activity is being managed to ALARP and acceptable levels.  |