

WA-474-P, WA-70-R Abandoned and Suspended Wells Environment Plan

1. Purpose of this report

NOPSEMA has accepted the WA-474-P, WA-70-R Abandoned and Suspended Wells Environment Plan (the EP) submitted by Western Gas (70 R) Pty Ltd (the titleholder) for the permanent abandonment in-situ of four (4) wellheads and suspension of one (1) wellhead activity on WA-70-R and WA-474-P in the Carnarvon Basin.

This report explains how NOPSEMA took into account matters that may be of interest to the public and accompanies the accepted EP, submitted by Western Gas (70 R) 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 Offshore Petroleum and Greenhouse Gas Storage Act 2006 (OPGGGS Act)
- the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulation 2009 (Environment Regulations)
- NOPSEMA Assessment Policy (PL0050), Environment Plan Assessment Policy (PL1347), Environment Plan Decision Making Guidelines (GL1721) and Consultation in the course of preparing an Environment Plan guideline (N-04750-GL2086);
- the Department of Industry, Science and Resources' Offshore Petroleum Decommissioning Guideline, March 2022
- NOPSEMA Section 572 regulatory Policy (PL1903) and Section 270 regulatory Policy (PL1959)
- the WA-474-P, WA-70-R Abandoned and Suspended Wells Environment Plan which includes the titleholder's Oil Pollution Emergency Plan (OPEP)
- 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 and Energy.

2. Next steps

Responsibility for the ongoing environmental performance of the activity remains, at all times, with Western Gas (70 R) 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-474-P, WA-70-R Abandoned and Suspended Wells 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 from the [Approved projects and activities](#) on NOPSEMA's website.

How NOPSEMA has taken into account key matters raised during the assessment and decision making process for the WA-474-P, WA-70-R Abandoned and Suspended Wells Environment Plan

#	Matter	Titleholder response	NOPSEMA's assessment and decision
1	<p>Leaving the wellheads in situ may not be acceptable and result in short and long term impacts and risks to the environment.</p>	<p>The EP describes the permanent abandonment in situ of the Chester-2, Glencoe-2, Mentorc-2, and Snapshot-1 exploration wellheads, following the drilling, plugging and abandonment of these exploration wells between 2011 and 2016. These wellheads are located in water depths ranging between 1,116m and 1,131m.</p> <p>Western Gas have provided an assessment of the technical feasibility of wellhead removal and compared the environmental impacts and risks of removal versus those arising from leaving the wellheads in situ as the basis for the petroleum activity described in the EP.</p> <p>In preparing the EP, Western Gas consulted with relevant persons to inform the evaluation of environmental impacts and risks of the proposal. This included Commonwealth and State government agencies, fishing industry bodies, First Nations relevant persons or organisation, and relevant fishing licence holders. Western Gas responded to all objection and claims made, presenting this information in the EP.</p> <p>Western Gas undertook an environmental impact and risk assessment for the wellheads proposed to be left in situ, taking into account the limited environmental sensitivities present. This included evaluating impacts from the degradation of the wellhead materials over time and immediate and</p>	<p>NOPSEMA recognises the importance of ensuring petroleum titleholders meet their decommissioning obligations as required under section 572 of the OPGGS Act.</p> <p>Western Gas is seeking to deviate from the requirement to remove all property, which may be considered when the titleholder demonstrates in the EP that the impacts and risks are reduced to ALARP and will be of an acceptable level, and the proposal delivers equal or better environmental outcomes compared to complete property removal.</p> <p>During the course of the assessment, NOPSEMA required Western Gas to provide further evaluation of the risks to fishers, additional specifications about the property and additional analysis of the impacts to the environment from degradation of the wellheads, to demonstrate leaving the wellhead in-situ will be acceptable.</p> <p>In response, Western Gas evaluated snagging risks to current and future potential fishers and performed additional consultation with fishing licence holders.</p> <p>Western Gas also provided further details on the impacts from the release of contaminants to the environment from the degradation of the wellhead structures.</p> <p>After taking into consideration Western Gas response and the information provided in the EP, NOPSEMA has concluded that the impacts and risks associated with the proposed activity will be acceptable and reduced to ALARP,</p>

		<p>future snagging risks to fishers from leaving the wellhead in place.</p> <p>Western Gas concluded that with controls measures in place, impacts and risks are reduced to ALARP and will be of an acceptable level. The controls measures identified include:</p> <ul style="list-style-type: none"> • Compliance with the <i>Environmental Protection (Sea Dumping) Act 1981</i>. • Ensuring the structure continues to be suitably marked on Australian Hydrographic Office (AHO) navigational charts. • Ensuring that final abandonment status and location has been communicated to relevant stakeholders, who will also implement standard fishing safety navigational controls 	<p>and the deviation delivers equal or better environmental outcomes compared to complete property removal.</p> <p>In making a decision, NOPSEMA also took into account the relevant available technical information and scientific literature, views expressed by relevant persons, section 572 and 270 of the OPGGS Act, and NOPSEMA's Decision Making Guidelines (GL1721).</p>
<p>2</p>	<p>Maintaining the Glenloth-1 well in suspended state, subject to a monitoring program.</p>	<p>The EP also describes how the titleholder proposes to maintain the Glenloth-1 well in a temporary suspension state, with allowance to conduct vessel based ROV visual inspections of the wellhead, during a 3-year period that commenced when the latest Well Operations Management Plan (WOMP) was accepted in March 2022. The well was drilled in 2010 and is in a water depth of 1,116m.</p> <p>The titleholder provided an evaluation of the status of Glenloth-1, with evaluation of impacts and risks arising from proposed vessel-based inspection activities monitoring activities.</p> <p>Western Gas concluded that with standard vessel activity controls measures in place, impacts and risks are reduced to ALARP and will be of an acceptable level.</p>	<p>NOPSEMA recognises that Section 572 of the Act requires that a titleholder must remove from the title area all structures that are, and all equipment and other property that is, neither used nor to be used in connection with the operations on the title.</p> <p>In line with this, NOSPEMA has set clear targets in its decommissioning compliance strategy that all wells will be plugged and closed off, within three years of permanently ceasing production.</p> <p>During the course of the assessment, NOPSEMA required Western Gas to provide further detail surrounding the status of the well, condition of the wellhead and the rational for keeping the well in a suspended state for additional time.</p> <p>Western Gas provided additional information about the integrity status of the well and wellhead (supported by information found in the WOMP and recent ROV imagery)</p>

			<p>and explained how maintaining the current suspended state is of relevance with objectives of potential work to be undertaken on title, hence that the well is still considered for future use.</p> <p>Taking into consideration the status of the well and nature of monitoring activities, NOPSEMA is satisfied that the environmental impacts and risks associated with the maintenance of Glentloth-1 in a suspended state have been reduced to ALARP and will be of an acceptable level, until such time as it is determined by Western Gas whether the well will be used by March 2025.</p> <p>In making a decision, NOPSEMA also considered information contained in the accepted Glenloth-1 WOMP, section 572 and 270 of the OPGGS Act, and NOPSEMA's Decision Making Guidelines (GL1721).</p>
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