



Application for Licence Amendment

Part V Division 3 of the *Environmental Protection Act 1986*

Licence Number	L4467/1972/14
Licence Holder	Chevron Australia Pty Ltd
ACN	086 197 757
File Number	DER2013/000939-4
Premises	Barrow Island Oil and Gas Facility Crown Reserve 11648 BARROW ISLAND WA 6712
Date of Report	20 October 2020
Decision	Revised licence granted

**Caron Goodbourn,
MANAGER, PROCESS INDUSTRIES
REGULATORY SERVICES**

an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

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1. Decision summary

Licence L4467/1972/14 (existing licence) is held by Chevron Australia Pty Ltd (licence holder) for the Barrow Island Oil and Gas Facility (the premises), located at Barrow Island, about 60 km off the coast of North West Australia.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the operation of the premises. As a result of this assessment, revised licence L4467/1972/14 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

2.2 Application summary

On 19 August 2020, the licence holder submitted an application to the department to amend licence L4467/1972/14 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments to the existing licence are being sought:

- remove prescribed premises *Category 85 – Sewage Facility* and remove or update all associated conditions given the 206 Equivalent Person (EP) wastewater treatment plant (WWTP) at the Production Camp is no longer operational;
- remove conditions 2 and 3 given all works to construct the 206 EP WWTP and bioremediation facility are complete; and
- remove conditions 4, 5, 6 and 7 given all commissioning activities associated with the works are complete.

The 206 EP WWTP was shut-down in July 2020 following a decision to re-locate the Barrow Island Oilfield workforce from the Production Camp to Butler Park (another camp on Barrow Island). The licence holder therefore no longer needs to operate the 206 EP WWTP, which received sewage generated by the workforce and discharged treated effluent to an ocean outfall point.

The 206 EP WWTP has a design capacity to treat up to 45.3 m³ of sewage per day and uses a 50 kL balance tank. The licence holder has not dismantled or removed any WWTP infrastructure from the premises, which includes the WWTP itself, the balance tank, treated effluent tank and ocean discharge pipeline (Figure 1). However, all storage vessels have been emptied and flushed to remove residual content (e.g. sewage) and chemicals previously stored at the facility (including poly-aluminium chloride, sodium hypochlorite, caustic soda, and poly sucrose) have been removed. Larger vessels may be partially filled with potable water to provide additional stability during the cyclone season.

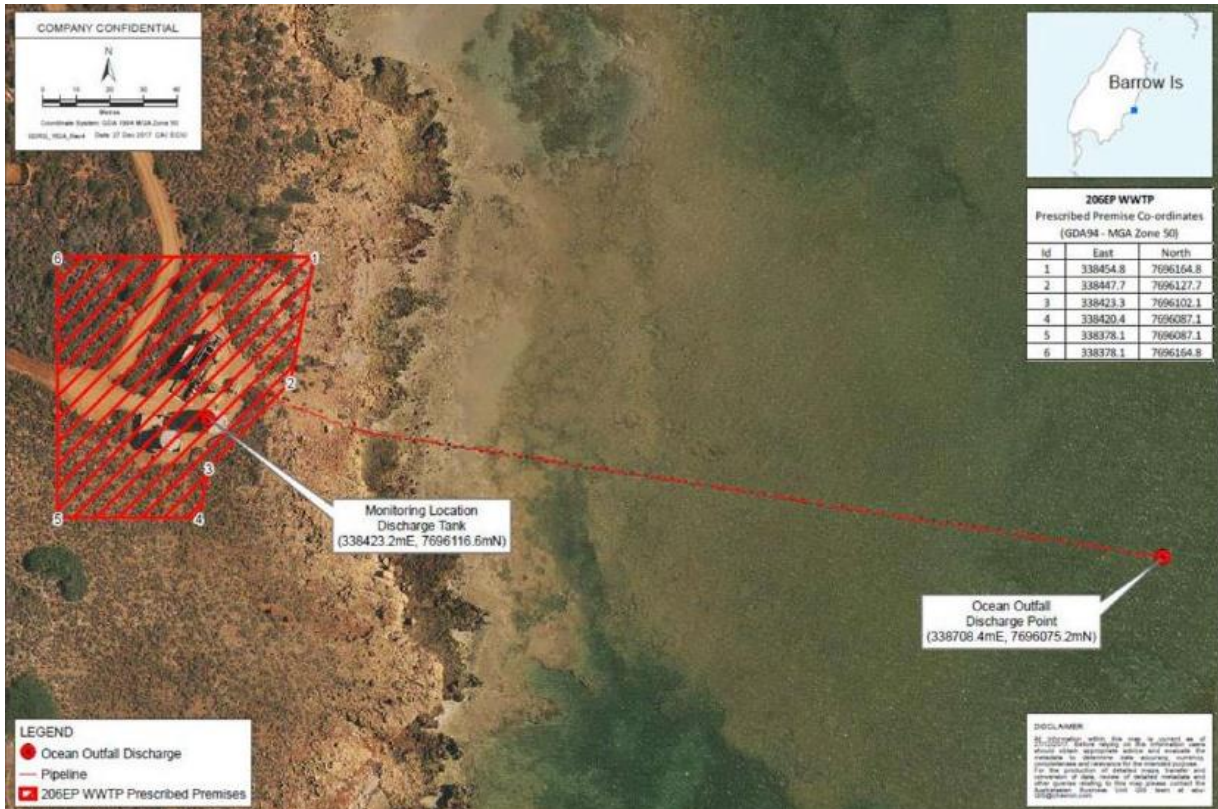


Figure 1 Location of the WWTP, including effluent monitoring location and ocean outfall discharge point

This amendment is limited to changes to Category 85 activities (Table 1) and the removal of redundant conditions from the existing licence. No changes to existing licence conditions relating to Category 10 and 57 have been requested by the licence holder.

Table 1: Proposed design or throughput capacity changes

Prescribed premises category and description	Assessed throughput or design capacity	Description of proposed amendment
Category 10: Oil or gas production from wells	310,886.5 tonnes per year	No change
Category 57: Used tyre storage	300 tyres	No change
Category 85: Sewage Facility	45.3 cubic metres per day	Remove Category and associated conditions from licence

3. Compliance history

3.1 Annual Audit Compliance Reports

The revocation of a prescribed activity from a licence requires the department to assess any ongoing risks to the environment as a result of the activities undertaken on the premises. To determine the nature and level of residual risk the history of the premises is considered with particular focus on any non-compliances such as historical loss of containment.

Annual Audit Compliance Reports (AACR) submitted by the licence holder have detailed three non-compliances with licence conditions associated with the WWTP during the period it was operational (May 2019 to July 2020). These non-compliances relate to one incident reported

on 19 June 2019 where treated effluent was discharged to the intertidal zone following damage to the ocean outfall discharge pipeline in strong weather conditions (Chevron 2019). This discharge resulted in non-compliance with conditions 1, 8 and 9; however, discharge occurred offshore and no impact to the environment was detected. A licensed plumber was engaged to repair the discharge pipeline.

4. Legislative context

4.1 Contaminated Sites Act 2003

The premises (Barrow Island) is currently classified under the *Contaminated Sites Act 2003* as 'contaminated - remediation required', with several areas known to be impacted by contamination within soil and/or groundwater, predominantly in the form of hydrocarbon (such as from oil). The WWTP area is not identified as a contaminated area in the Site's Notice of Classification (DWER 2020).

5. Decision

The changes proposed in this application will eliminate all emissions associated with Category 85 activities at the premises. Consequently, there is no longer potential for the two risk events previously identified from operation of the WWTP (Table 2) to occur and no risk assessment is required.

Table 2. Potential risk events previously identified for Category 85 activities

Source/Activities	Potential emission	Potential pathways and impact	Receptors
Category 85: Waste Water Treatment Plant operation – Disposal of treated effluent to marine environment via outfall	Treated effluent to marine environment	Direct discharge to marine surface waters causing adverse impacts on the marine environment	Marine species inhabiting area surrounding outfall discharge pipe
Category 85: Waste Water Treatment Plant operation – Sewage pipes and holding tanks	Rupture of pipes / overtopping of holding tanks resulting in sewage discharge to land	Direct discharge cause soil contamination inhibiting vegetation growth and survival	Vegetation adjacent to discharge area

The Delegated Officer has therefore determined that all regulatory controls currently specified in the existing licence to manage the risk of environmental harm associated with Category 85 activities at the premises are to be removed or revised accordingly. Key amendments to existing controls include:

- removing requirements to monitor, sample and report emissions to surface water;
- removing the authorised discharge point given the discharge of treated effluent to surface water via the WWTP ocean outfall will no longer occur; and
- removing operational requirements relating to the maintenance and integrity of the WWTP and discharge infrastructure given these items will no longer be operational.

In addition, existing controls relating to the construction and commissioning of the WWTP and Bioremediation Facility will be removed as the licence holder provided evidence that both of these facilities have been constructed and commissioned in accordance with requirements specified in the existing licence.

6. Consultation

Table 3 provides a summary of the consultation undertaken by the department.

Table 3: Consultation

Consultation method	Comments received	Department response
Local Government Authority advised of application on 25/08/2020	No comments received.	N/A
Licence holder was provided with draft amendment on 16/09/2020	The licence holder raised no objections to the proposed licence amendments. In addition, the licence holder confirmed that all chemicals had been removed from the facility and all storage vessels had been emptied and flushed with potable water.	N/A

7. Conclusion

The Delegated Officer has determined that a revised licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

7.1 Summary of amendments

Table 4 provides a summary of the licence amendments and will act as record of implemented changes. In addition to the amendments detailed in section 5, the Delegated Officer has also updated the format and appearance of the revised licence to reflect the current department licence format, and has removed or revised conditions now considered to be redundant. All proposed changes have been incorporated into the revised licence as part of the amendment process.

Table 4: Summary of licence amendments

Existing condition	Condition summary	Revised condition	Proposed amendments
1	Authorised emissions	-	Remove condition given specified emissions listed will no longer occur and general emissions requirements are no longer specified in accordance with the current licence format
2 3	Construction requirements	- -	Remove conditions given all construction works are complete. The 206 EP WWTP Compliance Report (A1772675) was submitted in March 2019 and the Bioremediation Facility Compliance Report (A1804025) was submitted in April 2019.
4 5 6 7	Commissioning requirements	- - - -	Remove conditions given commissioning has been completed. The 206 EP WWTP Commissioning Report (A1809386) was submitted in July 2019 and the Bioremediation Facility Commissioning Report (A1804025) was submitted in April 2019.

Existing condition	Condition summary	Revised condition	Proposed amendments
8	Infrastructure operational requirements	1	Remove reference to WWTP infrastructure
9	Authorised emission point	-	Remove condition given discharge point no longer exists
10	Groundwater monitoring requirements	2	Remove sampling method and analysis requirements
-	Groundwater sampling requirements	3	New condition specifying sampling method, analysis and laboratory requirements
11 12	Surface water monitoring requirements	- -	Remove condition given surface water monitoring is no longer required
13	Monitoring frequency	4	Remove reference to weekly surface water monitoring
14	Sample analysis requirements	-	Remove condition given laboratory requirements are now specified in revised condition 3
15	Record keeping	5	Remove reference to works in condition 2 which have been completed and update reference to monitoring conditions
16	Record keeping	6	No change
17	Reporting	7	Reformat condition
18	Reporting	8	Remove Annual Environmental Report requirements relating to condition 11 and 2 (WWTP monitoring results and interpretation)
19	Compliance	-	Remove condition (redundant)
Schedule 1: Maps	Premises maps	Schedule 1: Maps	Remove Works Infrastructure Map - Sewage Facility Location
Schedule 2: Primary Activities	Primary Activities and infrastructure and equipment	-	Remove Schedule 2 given Primary Activities are now displayed on new cover page and infrastructure specified with operational requirements are listed in revised condition 2

References

1. Chevron 2019, *Annual Audit Compliance Report (AACR) for Barrow Island Joint Venture Licence L4467/1972/14 (ABU190800328)*, submitted to DWER on 25 September 2019.
2. Department of Environment Regulation (DER) 2017, *Guidance Statement: Risk Assessments*, Perth, Western Australia.
3. Department of Water and Environmental Regulation (DWER) 2019, *Guideline: Decision Making*, Perth, Western Australia.
4. Department of Water and Environmental Regulation (DWER) 2020, *Notice of Classification for Lot 3000 on Deposited Plan 91514*.

Appendix 1: Application validation summary

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)				
Application type				
Works approval	<input type="checkbox"/>			
Licence	<input type="checkbox"/>	Relevant works approval number:		None <input type="checkbox"/>
		Has the works approval been complied with?	Yes <input type="checkbox"/> No <input type="checkbox"/>	
		Has time limited operations under the works approval demonstrated acceptable operations?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
		Environmental Compliance Report / Critical Containment Infrastructure Report submitted?	Yes <input type="checkbox"/> No <input type="checkbox"/>	
		Date Report received:		
Renewal	<input type="checkbox"/>	Current licence number:		
Amendment to works approval	<input type="checkbox"/>	Current works approval number:		
Amendment to licence	<input checked="" type="checkbox"/>	Current licence number:	L4467/1972/14	
		Relevant works approval number:	N/A	<input type="checkbox"/>
Registration	<input type="checkbox"/>	Current works approval number:	None	<input type="checkbox"/>
Date application received	19/08/2020			
Applicant and Premises details				
Applicant name/s (full legal name/s)	Chevron Australia Pty Ltd			
Premises name	Barrow Island Oil and Gas Facility			
Premises location	Portion of Crown Reserve 11648, Barrow Island, WA 6172			
Local Government Authority	Shire of Ashburton			
Application documents				
HPCM file reference number:	A1925207			
Key application documents (additional to application form):	N/A			
Scope of application/assessment				

Summary of proposed activities or changes to existing operations.	The Licence Holder has requested the removal of prescribed premises <i>Category 85 – Sewage Facility</i> and associated conditions from the existing licence L4467/1972/14 given the “206 EP” wastewater treatment plant (WWTP) ceased to be operational in July 2020. The shut-down of 206 EP WWTP follows a decision to re-locate the Barrow Island Oilfield workforce from the Production Camp to Butler Park (another camp on Barrow Island). As a result of this decision, the Licence Holder no longer needs to operate the 206 EP WWTP at the Production Camp, which received sewage generated by the workforce and discharged treated wastewater to an ocean outfall point.
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Category number/s (activities that cause the premises to become prescribed premises)

Table 1: Prescribed premises categories

Prescribed premises category and description	Assessed production or design capacity	Proposed changes to the production or design capacity (amendments only)
Category 10: Oil or gas production from wells	310,886.5 tonnes per year	No proposed changes
Category 57: Used tyre storage	300 tyres	No proposed changes
Category 85: Sewage Facility	45.3 cubic metres per day	Remove Category from Licence

Legislative context and other approvals

Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/>
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: EPA Report No:
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Reference No:
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Certificate of title <input checked="" type="checkbox"/> General lease <input type="checkbox"/> Expiry: Mining lease / tenement <input type="checkbox"/> Expiry: Other evidence <input type="checkbox"/> Expiry:
Has the applicant obtained all relevant planning approvals?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	Approval: Expiry date: If N/A explain why? No works are proposed.
Has the applicant applied for, or have an existing EP Act clearing permit in relation	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	CPS No: N/A No clearing is proposed.

to this proposal?		
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Application reference No: N/A Licence/permit No: N/A No clearing is proposed.
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Application reference No: Licence/permit No: Licence / permit not required.
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A Type: N/A Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Regional office: N/A
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A Priority: N/A Are the proposed activities/ landuse compatible with the PDWSA (refer to <u>WQPN 25</u>)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx</i>)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<i>Petroleum and Geothermal Energy Resources Act 1967</i> – Issues Titles for petroleum exploration and production in WA (onshore or internal waters) <i>Petroleum and Geothermal Energy Resources (Environment) Regulations 2012</i> – Regulation of onshore petroleum activities <i>Petroleum (Submerged Lands) Act 1982</i> – Issues Titles for petroleum exploration and production in WA (state waters) <i>Conservation and Land Management Act 1984</i> – Applies to Nature Reserves, including Barrow Island <i>Contaminated Sites Act 2003</i>

Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Classification: Contaminated – remediation required (C-RR) Date of classification: 12/08/2020