



## Application for Works Approval Amendment

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

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**Works Approval Number** W6515/2021/1

**Works Approval Holder** AWE Perth Pty Ltd

**ACN** 009 204 031

**File Number** DER2021/000104~2

**Premises** Waitsia Gas Project Stage 2  
Pye Road  
YARDARINO WA 6525

Legal description –

Part Lot 4 on Plan 13178, Lot 1847 on Deposited Plan 248546, Part Lot 12297 on Deposited Plan 220114, Part Lot M519 on Plan 2993, Part Lot M356 on Plan 2993, Part Lot M357 on Plan 2993, Part Lot 3 on Plan 13178, Part Lot 2 on Plan 4780, Part Lot 1456 on Deposited Plan 246641, Part Lot 1844 on Deposited Plan 248529, Part Lot 877 on Deposited Plan 246574, Part Lot 478 on Deposited Plan 231555, Part Lot 479 on Deposited Plan 231555, Part Lot 876 on Deposited Plan 246573, Part Lot M359 on Plan 2991, Part Lot 701 on Plan 21644 and part of Road isolations (Parcel Identification Number (PIN) 1219234 and 1350605), within Production Licence L1 as shown in Schedule 1 of the Works Approval

**Date of Report** 18 October 2022

**Decision** Revised works approval granted

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## 1. Decision summary

Works Approval W6515/2021/1 is held by AWE Perth Pty Ltd (Works Approval Holder) for the Waitsia Gas Project Stage 2 (the Premises), located at Pye Road, Yardarino.

On 26 July 2022, the department initiated an amendment to Works Approval W6515/2021/1 to amend the boundary of the premises to incorporate the extraction wells. This Amendment Report documents the decision by the Delegated Officer to initiate an amendment to Works Approval W6515/2021/1. As a result of the amendment, a Revised Works Approval 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 Amendment summary

On 3 August 2021 Works Approval W6515/2021/1 was granted to the Works Approval Holder authorising the construction and time limited operation of the Waitsia Gas Project Stage 2. The project aims to further develop the Waitsia gas field by drilling and connecting additional wells to a new gas processing plant (Waitsia Gas Plant).

The Works Approval was granted for Category 10 activities as described in Schedule 1 of the Environmental Protection Regulations 1987:

*Oil or gas production from wells: premises, whether on land or offshore, on which crude oil, natural gas or condensate is extracted from below the surface of the land or seabed, as the case requires, and is treated or separated to produced stabilised crude oil, purified natural gas or liquefied hydrocarbon gases.*

The prescribed premises defined in the current Works Approval (Schedule 1) is limited to the gas processing infrastructure at the Waitsia Gas Plant site and does not include the gas gathering infrastructure such as extraction/production wells or flowlines. On review of the application of Category 10, the Delegated Officer determined that for Category 10 to apply, the premises must be one on which both of the following occurs:

- the extraction of crude oil, natural gas or condensate (collectively “gas”); and
- the treatment or separation of that gas.

To ensure the correct application of Category 10, the Delegated Officer has determined to amend the premises boundary to incorporate the following infrastructure into the premises boundary specified in the Works Approval:

- eight production wells including two existing suspended appraisal wells; and
- flowlines and gathering hubs to convey extracted gas to the Waitsia Gas Plant.

### 2.3 Legislative context

#### 2.3.1 Part IV of the EP Act

The Stage 2 proposal was referred to the EPA in August 2019 under section 38 of the EP Act. In October 2019, the level of assessment was set at Referral Information and a two-week public review period applied.

The EPA released its final report on the assessment (EPA Report 1687) in September 2020 and Ministerial Statement 1164 (MS1164) was granted on 1 February 2021. The approved proposal is to construct and operate a 250 terajoule (TJ) per day conventional gas production facility and related infrastructure including up to eight production wells.

In its assessment, the EPA considered the following environmental factors:

- Flora and vegetation;
- Air quality;
- Greenhouse gas emissions;
- Inland waters; and
- Social surroundings.

A summary of conditions relevant to the works approval is included in Table 1.

**Table 1: Summarised conditions of MS1164 relevant to assessment of the category 10 proposal under Part IV of the EP Act.**

Environmental Factor	Condition	Condition summary
Flora and Vegetation Management Plan	6	Implementation of the <i>Waitsia Gas Project Stage 2: Flora and Vegetation Management Plan</i> to ensure no direct or adverse indirect impact to flora and vegetation within the Yandanogo Nature Reserve
Water Management Plan	7	Implementation of the <i>Waitsia Gas Project Stage 2: Water Management Plan</i> to ensure no adverse impact to Ejarro Spring or groundwater levels/quality.
Greenhouse Gas Management Plan	8	Implementing management measures to reduce carbon emissions from the proposal including the implementation of the <i>Waitsia Gas Project Stage 2: Greenhouse Gas Management Plan</i>
Heritage Management	10	Measures for avoiding and minimizing impacts to Aboriginal heritages sites.

### 2.3.2 Department of Mines, Industry Regulation and Safety

In Western Australia, all onshore petroleum exploration and developments are subject to approval by the Department of Mines, Industry Regulation and Safety (DMIRS) under the following legislation:

- *Petroleum and Geothermal Energy Resources Act 1967* (PGER Act);
- Petroleum and Geothermal Energy Resources (Environment) Regulations 2012 (PGER Regulations);
- *Petroleum Pipelines Act 1969*; and
- Petroleum Pipelines (Environment) Regulation 1969 (Pipeline Regulations).

DMIRS regulate environmental risks associated with the drilling of extraction wells and the transport of reservoir fluids via flowlines to the gas gathering hubs and gas processing infrastructure through approved Environment Plans in accordance with the PGER Regulations and Pipeline Regulations.

Environment Plans approved by DMIRS under the PGER Act and regulations relating to the construction and operation of extraction wells and flowlines include:

- *Waitsia Stage 2: Drilling Environment Plan Summary* (WAT-HSE-PLN-00003, Revision

4A) covers the installation of six new wells (Waitsia-05, Waitsia-06, Waitsia-07, Waitsia-08, Waitsia-09 and Waitsia-10);

- *Waitsia Stage 2: Facilities and Temporary Construction Village Environment Plan* (WGP-HSE-PLN-00007, Revision 2);
- *Waitsia Gas Project Stage 2: Flowline and Hubs Construction Environment Plan* (WGP-HSE-PLN-00002, Revision 3); and
- *Waitsia Gas Project Stage 2: Gas Export Pipeline Construction Environment Plan* (WGP-HSE-PLN-00003).

Commissioning and operation of the Waitsia Stage 2 Project is subject to a separate EP (Waitsia Stage 2: Commissioning and Operations Environment Plan, WGP-HSE-PLN-00019). which was submitted to DMIRS in August 2022.

DMIRS advised that environmental risks and impacts associated with the construction, commissioning and operations of the wells and flowlines can be appropriately managed under the PGER and Pipelines Acts and Regulations.

**Key findings:** The Delegated Officer has considered the above legislative context associated with the proposed reinjection activities and has determined that:

- In accordance with DWER's *Guidance Statement: Setting Conditions*, conditions of a Part V works approval must not be "...contrary to, or otherwise than in accordance with, an implementation agreement or decision under Part IV of the EP Act." Further, that conditions "will not unnecessarily duplicate requirements imposed on licensees directly by the EP Act or another written law."
- The Revised Works Approval will not unnecessarily duplicate the requirements of MS1164, or reassess the following Environmental Factors already assessed through EPA Assessment 1687:
  - Flora and vegetation;
  - Greenhouse gas;
  - Inland waters; and
  - Social surroundings.
- DMIRS is the lead agency responsible for the regulation of activities associated with the extraction of reservoir fluids and transport to the gas processing infrastructure.
- Construction, commissioning and operation of the production wells and transport infrastructure (i.e. flowlines), will be adequately assessed and managed under DMIRS administered legislation and assessment processes and therefore no further regulatory control is warranted under Part V of the EP Act.
- In order to avoid regulatory duplication, environmental risks associated with the construction and operation of the production wells have not been conditioned further under the works approval.

### 3. Consultation

Table 2 provides a summary of the consultation undertaken by the department.

**Table 2: Consultation**

Consultation method	Comments received	Department response
Works Approval was provided with draft amendment on 10 August 2022	The Applicant confirmed the extent of the premises boundary.	N/A
	The Applicant requested the correction of a typographical error in condition 2 (Table 2) relating to the liner properties; the minimum tensile strength (22,000 kN/m) is incorrect and should read 22 kN/m.	Error corrected.

### 4. Conclusion

The Delegated Officer has considered the legislative context of the proposal and determined not to undertake a detailed assessment of environmental risks associated with the construction and operation of the gas gathering infrastructure (i.e. extraction wells and flowlines), as it considers that environmental risks will be adequately regulated through MS1164 and DMIRS administered legislation (refer to section 2.3). On this basis, the Revised Works Approval has been granted to extend the premises boundary to include the gas gathering network but without the application of specific management controls for regulating environmental risks.

### References

1. Department of Environment Regulation (DER) 2016, *Guidance Statement: Environmental Siting*, Perth, Western Australia.
2. DER 2017, *Guidance Statement: Risk Assessments*, Perth, Western Australia.
3. DER 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.