

## Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V*

Once completed, please submit this form either via email to [info-der@dwer.wa.gov.au](mailto:info-der@dwer.wa.gov.au), or to the below postal address:

Department of Water and Environmental Regulation  
 Locked Bag 33 Cloisters Square  
 PERTH WA 6850

Section A – Licence Details			
Licence number:	L9102/2017/1	Licence file number:	DER2017/001839
Licence holder:	[REDACTED]		
Trading as:	[REDACTED]		
ACN:	[REDACTED]		
Registered address:	[REDACTED]		
Reporting period:	01 July 2020 to 30 June 2021		

Section B – Statement of Compliance with Licence Conditions
Did you comply with all of your licence conditions during the reporting period? (please tick the appropriate box)
<input type="checkbox"/> Yes – please complete: <ul style="list-style-type: none"> <li>section C;</li> <li>section D if required; and</li> <li>sign the declaration in Section F.</li> </ul>
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none"> <li>section C;</li> <li>section D if required;</li> <li>section E; and</li> <li>sign the declaration at Section F.</li> </ul>

Section C – Statement of Actual Production	
Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed Premises Category	Actual Production Quantity
10 – Oil or gas production from well 34 – Oil or gas refining	<ul style="list-style-type: none"> <li>LNG: 11,730,674 tonnes</li> <li>DomGas: 163.38 TJ/day</li> <li>Condensate: 602,948 tonnes</li> </ul>
52 – Electrical power generation	223.33 MW
54 – Sewage facility	187.48 m <sup>3</sup> /day
62 – Solid waste depot	<ul style="list-style-type: none"> <li>~49,680 tonnes of stockpiled concrete waste</li> <li>2971.50 tonnes of other solid waste</li> </ul>
73 – Bulk storage of chemical	1090 m <sup>3</sup>

Section D – Statement of Actual Part 2 Waste Discharge Quantity	
Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed Premises Category	Actual Part 2 Waste Discharge Quantity
N/A	

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	9 (Table 15, Schedule 3)	Date(s) of non-compliance:	Until 29 October 2020
Details of non-compliance:			
<p>Non-compliance against condition 9, as set out in Table 14 Schedule 3. That being the continuous daily monitoring of Hydrocarbon (including BTEX) by the use of the online analysers.</p> <p>This non-compliance was initially reported in the 2020 AACR, and has been included in this AACR as the non-compliance was closed out in the current reporting period.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
There was no environmental impact.			
Cause (or suspected cause) of non-compliance:			
A review was completed which indicated the availability of the online analyser is periodic during the staged commissioning and start up CO2 compression, transport and injection system.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Since identification of this non-compliance a review has been completed and work is underway to ensure availability of the analysers as per the licence conditions. As of 29 October 2020 all three analysers were available.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 26/11/2019	

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	9 (Table 15, Schedule 3)	Date(s) of non-compliance:	July 2020
Details of non-compliance:			
Non-compliance against Condition 9, as set out in Table 15, Schedule 3. Monthly H <sub>2</sub> S monitoring of the CO <sub>2</sub> Trains. Monthly sampling for H <sub>2</sub> S was not completed on the following occasions: Train 1: July 2020. Train 3: July 2020.			
What was the actual (or suspected) environmental impact of the non-compliance? <b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No environmental impact was suspected as a result of the non-compliance. For the monthly samples taken, all results were two-fold lower than the 400 ppmv licence limit for H <sub>2</sub> S.			
Cause (or suspected cause) of non-compliance:			
A review into this non-compliance was completed. This indicated an internal breakdown in communication and an oversight on laboratory sampling requirements led to the non-compliance.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
On 20 August 2020, the Laboratory was contacted upon identification of the non-compliance. The monthly sampling requirement for H <sub>2</sub> S was communicated.			
This non-compliance was reported to DWER on 25 August 2020 (ABU200800567).			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 25 / 08 / 2020	

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	10	Date(s) of non-compliance:	13 January 2021
Details of non-compliance:			
Non-compliance against Condition 10, management of Waste generated on the Premises (as per Licence L9102/2017/1 Schedule 1: Premises Map). Non-compliance is in relation to wastes produced from other Premises, being managed on the Premises.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
There was no environmental impact. Management of all wastes on the Premise that have been generated from other Premises is in accordance with - L9102/2017/1 conditions relating to 'Discharge to Land' and 'Waste Management' as well as the Gorgon Gas Development and Jansz Feed Gas Pipeline Solid and Liquid Waste Management Plan (GOR-COP-01286).			
Cause (or suspected cause) of non-compliance:			
It was not anticipated that there would be wastes generated from other Premises to be managed on the Premises, during steady state Operations.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Prior to the non-compliance being identified, CAPL submitted on 23 December 2020, a licence amendment application to DWER. This licence amendment was to include Category 61: Liquid Waste Facility (premises on which liquid waste produced on other premises (other than sewerage waste) is stored, reprocessed, treated or irrigated) on L9102/2017/1 and was to allow wastes produced from other Premises, to be managed on the Premises. The licence amendment was approved on 30 August 2021.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 19 /01 /2021	

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	14, Table 9	Date(s) of non-compliance:	11 December 2020
Details of non-compliance:			
Condition 14, Table 9 Infrastructure and equipment controls, exceedance of minimum freeboards of 600mm for Stormwater Holding Pond (SWHP). During a recent rainfall event, the SWHP exceeded the 600mm freeboard, triggering the high alarm.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No environmental impact. Water remained contained within SWHP.			
Cause (or suspected cause) of non-compliance:			
The pond captured the first flush from a significant rainfall event, and the penstock valve closed as designed to prevent freeboard exceedance. The penstock valve later re-opened and a volume of water that had collected upstream of the valve proceeded to cause a freeboard exceedance.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The 600mm freeboard high level alarm for SWHP was triggered on the 11th December at 4:30pm. The valve was closed and freeboard levels monitored. Reviewed designed set points for the alarms and automated valve actuation (for reopening) for SWHP to ensure 600mm freeboard is maintained.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 11/12/2020	



Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	14, Table 9	Date(s) of non-compliance:	2 March 2021
Details of non-compliance:			
Condition 14, Table 9 Infrastructure and equipment controls, exceedance of minimum freeboards of 600mm for Stormwater Holding Pond (SWHP). During a recent rainfall event, the SWHP exceeded the 600mm freeboard, triggering the high alarm.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No environmental impact. Water remained contained within SWHP.			
Cause (or suspected cause) of non-compliance:			
The pond captured the first flush from a significant rainfall event and the penstock valve closed as designed to prevent freeboard exceedance. During the time taken for the penstock valve to close, remaining inflow into the SWHP and rainfall caused a freeboard exceedance.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Implemented changes identified from the recent review of set points for the alarms and automated valve actuation (opening and closing) for the SWHP to ensure 600 mm freeboard is maintained. The review, completed post the freeboard exceedance reported to DWER on 18 December 2020, identified changes to the automated valve to allow sufficient time for opening and closing of the valve to prevent a freeboard exceedance.			
Reported to DWER in writing on 5 March 2021 (ABU210300132)			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 05/02/2021	

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	14, Table 9	Date(s) of non-compliance:	5 May 2021
Details of non-compliance:			
Condition 14, Table 9 Infrastructure and equipment controls, exceedance of minimum freeboards of 600mm for Stormwater Holding Pond (SWHP). During a recent rainfall event, the SWHP exceeded the 600mm freeboard, triggering the high alarm.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No environmental impact. Water remained contained within SWHP.			
Cause (or suspected cause) of non-compliance:			
The pond captured the first flush from a significant rainfall event and automated valve actuation (opening and closing) was initiated at revised setpoints. Water levels continued to slowly increase following automated closure of the valves, resulting in an exceedance of the 600 mm freeboard high level alarm for the SWHP. Further investigation found the upstream valve was passing (not fully sealed).			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Determined why the penstock valve was passing and rectified the issue for the SWHP to ensure 600 mm freeboard is maintained. Add an action to the alarm in the interim to assure the valve has closed by attempting to physically turn the valve. Please note actions from the review, completed post the freeboard exceedance reported to DWER on 18 December 2020, have been implemented and are not related to this event.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date:	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 11/05/2021	

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	9, Table 14	Date(s) of non-compliance:	25 October 2021
Details of non-compliance:			
Non-compliance against condition 9, as set out in Table 14, Schedule 3: Monitoring. That being the continuous daily monitoring of hydrocarbon (including BTEX) by the use of the CO2 online analysers on Trains 1 to 3. As per Table 1: Definitions, continuous is defined as 'means operates with an availability greater than 90 per cent on a calendar monthly basis'.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No environmental impact.			
Cause (or suspected cause) of non-compliance:			
As part of the preparation of the L9102 Annual Environmental Report (AER), it was identified that the CO2 analysers on Trains 1 to 2 were not available continuously, on a few occasions, from November 2020. The cause of the analysers not being available continuously is currently under review.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
On the 25 October, communications were established to determine the cause of the analysers not being available continuously. A review of the monthly manual sampling results completed has confirmed that the limit in relation to hydrocarbon has been met on all occasions.			
Any actions to prevent future non-compliances will be identified once the review on the cause of the analysers not being continuously available are determined.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 29/10/2021	



**Section F – Declaration**

I / We declare that the information in this Annual Audit Compliance Report is true and correct and is not false or misleading in a material particular<sup>1</sup>.

I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.

Signature <sup>2</sup> :		Signature:	-
Name: (printed)		Name: (printed)	-
Position:		Position:	-
Date:		Date:	-
Seal (if signing under seal):			

<sup>1</sup> It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular.

<sup>2</sup> AACRs can only be signed by the licence holder or an authorised person with the legal authority to sign on behalf of the licence holder.