

## 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:	Chevron Australia Pty Ltd		
Trading as:	Chevron Australia Pty Ltd		
ACN:	086 197 757		
Registered address:	Level 1 162 Grand Boulevard JOONDALUP WA 6027		
Reporting period:	01 July 2022 to 30 June 2023		

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: 16,681,537 tonnes</li> <li>• DomGas: 280.07 TJ/day</li> <li>• Condensate: 864,424 tonnes</li> </ul>
52 – Electrical power generation	261.78 MW
54 – Sewage facility	233.63 m <sup>3</sup> /day
61 – Liquid waste facility	493 tonnes per annual period
61A – Solid waste depot	<ul style="list-style-type: none"> <li>• 69,503 tonnes of stockpiled concrete waste</li> <li>• 2709 tonnes of other solid waste</li> </ul>

<b>Section C – Statement of Actual Production</b>	
73 – Bulk storage of chemicals etc	1090 m <sup>3</sup>
77 – Concrete batching or cement products manufacturing	4,546 tonnes per annual period

<b>Section D – Statement of Actual Part 2 Waste Discharge Quantity</b>	
Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.	
<b>Prescribed Premises Category</b>	<b>Actual Part 2 Waste Discharge Quantity</b>
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:	Condition 9, Table 14, Schedule 3 (Monitoring)	Date(s) of non-compliance:	12 September 2022
Details of non-compliance:			
<p>For the calendar month of September 2022, the CO<sub>2</sub> online analyser on Train 1 was only available for monitoring hydrocarbon (including BTEX) for approximately 89.4 percent of that month. Greater than 90 percent availability was maintained for all other calendar months in the reporting period.</p> <p>This represents a non-compliance against Condition 9, as set out in Table 14, Schedule 3: Monitoring of Discharges to Land. That being the continuous daily monitoring of hydrocarbon (including BTEX) by the use of the CO<sub>2</sub> online analyser on Train 1. As per Table 1: Definitions, 'continuous' is defined as 'operates with an availability greater than 90 per cent on a calendar monthly basis'.</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:			
<p>At 09:50 on 9 September 2022, maintenance activities were completed on the Train 1 CO<sub>2</sub> online analyser (111-QT0040). Following completion of the maintenance activity, it is standard procedure for the analyser to be brought back online, however, due to technical issues, the analyser remained unavailable until 14:10 on the 12 September 2022. As per the definition in Table 1 of the Licence, the analyser had not been available continuously for greater than 90 percent of the calendar month. Total downtime due to the event equated to approximately 10.6% of that calendar month.</p> <p>The investigation found that:</p> <ul style="list-style-type: none"> <li>• Following maintenance activities carried out on the analyser on the morning of the 9 September, as the analyser was powered up again there was an issue with the stability of the analyser.</li> <li>• Further troubleshooting occurred on 12 September which confirmed the fault was associated with the Flame Ionisation Detector (FID).</li> </ul> <p>The cause of the outage was determined to be due to a failure in the FID.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Immediate actions: As per the analyser availability protocols, communications were established to determine the cause of the analyser not being available continuously. A manual sample was completed while the analyser was offline, and this confirmed that the hydrocarbon Licence limit (as per Condition 8; Table 5) had been met.</p> <p>Rectification work was completed, and the analyser was back online at 14:10 on 12 September. A replacement FID was sourced from Dampier and was installed on 19 September 2022.</p> <p>A follow up action identified during the investigation, was to evaluate potential optimisation opportunities associated with the analyser to improve continuous monitoring performance. A sparing review based on component criticality was also completed to adjust sparing and improve repair and maintenance timeframes.</p>			

Section E – Details of non-compliance with licence condition	
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: 19/09/2022

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:	Condition 9, Table 14: Monitoring of Discharges to Land in Schedule 3.	Date(s) of non-compliance:	02 December 2022
Details of non-compliance:			
Non-compliance against Condition 9, as set out in Table 14: Monitoring of Discharges to Land in Schedule 3. That being a monthly sample from the CO <sub>2</sub> acid gas stream at the designated sample point for H <sub>2</sub> S and BTEX. During October 2022, a monthly sample from the CO <sub>2</sub> acid gas stream at the “Analyser Train 2” sample point for H <sub>2</sub> S was not completed, as per Condition 9 as set out in Table 14 in Schedule 3. Non-compliance was first confirmed internally on 2 December 2022 and reported to DWER on 9 December 2022.			
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.			
Cause (or suspected cause) of non-compliance:			
It appears that a ‘glitch’ occurred in the STAR Laboratory Information Management System (LIMS) software utilised by Chevron to support laboratory sampling. Each month, LIMS generates a sampling schedule, which includes the monthly licence sampling requirements. For October 2022, an unknown error caused the “Analyser Train 2” sample to be excluded from the monthly sampling schedule.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Immediate actions: Review of the monthly licence sampling requirements within LIMS to verify the existing configuration and identify any revisions required. The review confirmed sampling for H<sub>2</sub>S for “Analyser Train 2” had been scheduled and completed in November 2022 and the December sampling for H<sub>2</sub>S was included in the schedule. It appears that the missed sampling in October was an anomaly and no upgrades to LIMS were possible.</p> <p>Follow up Actions: An investigation was undertaken with additional actions identified. This included the establishment of an automated email from the Production Information (PI) Management System, prior to the end of the month, if no H<sub>2</sub>S sampling result is detected. The purpose of this notification is to prompt a review and completion of the monthly sampling.</p>			
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: 09/12/2022	

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:	Condition 9, Table 14: Monitoring of Discharges to Land in Schedule 3.	Date(s) of non-compliance:	27 March 2023
Details of non-compliance:			
<p>Non-compliance against Condition 9, as set out in Table 14: Monitoring of Discharges to Land in Schedule 3. That being a monthly sample from the CO<sub>2</sub> acid gas stream at the designated sample point for H<sub>2</sub>S and BTEX. During February 2023, a monthly sample from the CO<sub>2</sub> acid gas stream at the “Analyser Train 1” and “Analyser Train 2” sample points for H<sub>2</sub>S was not completed, as per Condition 9 as set out in Table 14, Schedule 3. This non-compliance was first confirmed internally on 27 March 2023 and reported to DWER on 3 April 2023.</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <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:			
<p>Each month the STAR LIMS software generates a sampling schedule. This includes the monthly licence sampling requirements for H<sub>2</sub>S. For February 2023, a ‘glitch’ in the LIMS software caused the H<sub>2</sub>S sampling to be excluded from the monthly sampling schedule.</p> <p>In October 2022 (prior event, dated 2 December 2022), a similar glitch in the LIMS software occurred, resulting in the missed monthly sample for H<sub>2</sub>S. A corrective action from the investigation was the establishment of an automated email notification from the PI Management System, prior to the end of each month, if no H<sub>2</sub>S sampling result is detected. This email notification was in place as of December 2022, but was not triggered in February 2023 due to an error in the coding logic. The logic was intended such that if a sample was not taken on the current month, then a notification would be sent to complete the monthly sampling. Instead, the logic was erroneously set up such that it required a full month of a missed sample, before sending the notification.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Immediate actions: The review of sampling history confirmed that sampling for H<sub>2</sub>S for “Analyser Train 1” and “Analyser Train 2” had been completed in January 2023 and March 2023. The logic in the coding for the automated email was reviewed and amended accordingly to ensure that a notification is issued, prior to the end of the month, if no sample is taken.</p> <p>Follow up actions: An investigation was undertaken with additional actions identified. The functionality of the PI email notification to select personnel was tested and confirmed to be functioning. In addition, a second PI email notification was established prior to the end of the month if no H<sub>2</sub>S sampling result is detected. The purpose of this notification is to elevate the review and confirm completion of the monthly sampling.</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	

**Section E – Details of non-compliance with licence condition**

<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 03/04/2023
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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:	Condition 14, Table 9: Process Monitoring	Date(s) of non-compliance:	20 and 22 June 2023
Details of non-compliance:			
Non-compliance against Condition 14, as set out in Table 9: Process Monitoring. That being the daily monitoring at the Temporary Wastewater Injection Plant (TWIP) wells (WDW1 and WDW2) for wellhead pressure and A Annulus pressure. On two occasions during the reporting period, daily monitoring of wellhead pressure and A annulus pressure at the TWIP wells was not completed as per Condition 14 and Table 9 as the wells could not be accessed safely.			
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.			
Cause (or suspected cause) of non-compliance:			
On two occasions, daily monitoring was not completed as the TWIP could not be accessed safely due to road closures as a result of a flooding event (20 June 2023) and radiography activities (22 June 2023).			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The TWIP data collection procedure was reviewed and updated to confirm relevant points of contact.  A licence amendment will be submitted to propose amended wording to Condition 14, as set out in Table 9: Process Monitoring.			
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: 20/10/2023	



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:	Gorgon Operations Manager	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.