

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, 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 24, QV1 Building 250 St Georges Terrace PERTH WA 6000		
Reporting period:	01 July 2021 to 30 June 2022		

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"> • section C; • section D if required; and • sign the declaration in Section F.
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none"> • section C; • section D if required; • section E; and • sign the declaration at Section F.

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"> • LNG: 16,746,664 tonnes • DomGas: 219.90 TJ/day • Condensate: 861,077 tonnes
52 – Electrical power generation	269.52 MW
54 – Sewage facility	206.03 m ³ /day
61 – Liquid waste facility	741.10 tonnes per annual period
61A – Solid waste depot	<ul style="list-style-type: none"> • 62,654 tonnes of stockpiled concrete waste • 2508 tonnes of other solid waste

Section C – Statement of Actual Production	
73 – Bulk storage of chemicals etc	1090 m ³
77 – Concrete batching or cement products manufacturing	818 tonnes per annual period

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 14, Schedule 3)	Date(s) of non-compliance:	25 January 2022
Details of non-compliance:			
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 ₂ online analyser on Train 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?			
NOTE – 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 21 January 2022, routine planned maintenance activities were completed on the Train 3 CO ₂ online analyser. As per the standard procedure, following completion of the maintenance activities, the analyser was brought back online. After being brought back online, the analyser availability was intermittent and, as of 10:20 on 25 January 2022, the analyser had not been available continuously for the calendar month (as per Table 1 definition).			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
As per the analyser availability protocols, communications were established to determine the cause of the analyser not being available continuously. Weekly manual sampling was completed whilst the analyser was offline which confirmed that the hydrocarbon Licence limit (as per Condition 8; Table 5) had been met. Rectification work was completed and the analyser was back online at the time of reporting (1 February 2022).			
An automated notification process has since been implemented to ensure relevant personnel are notified when the analyser is offline and enable a timely response for manual sampling and rectification.			
In addition, a review is underway of equipment configuration and maintenance philosophy to address the functionality issues with the analyser.			
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: 1/02/2022	

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:	1 (Table 2) and 7 (Table 4)	Date(s) of non-compliance:	Not yet confirmed (reported to DWER on 13 April 2022)
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Details of non-compliance:

Potential non-compliance against Condition 1 (Infrastructure and Equipment) and corresponding Table 2 (Infrastructure and Equipment Controls) and Condition 7 (Discharges to land) and corresponding Table 4 (Authorised Discharges to Land). The potential non-compliance is in relation to the Stormwater Holding Pond (SWHP) and Oily Water Sump (OWS) being 'maintained in good working order' as per Condition 1 and discharges from the SWHP at locations other than the corresponding discharge point (L1) as per Condition 7.

What was the actual (or suspected) environmental impact of the non-compliance?

NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.

Any pollution/environmental harm or the likelihood of pollution/environmental harm is still to be determined through the further actions identified below. From groundwater sampling of bores (within the plant as well as outside of the plant footprint), mercury has been detected in the groundwater bore adjacent to the SWHP/OWS. The impact is considered localised

Cause (or suspected cause) of non-compliance:

As noted in the Section 72 (ABU220200159) submitted to DWER on 9 March 2022, a review on the potential source of mercury was underway and has now been completed. This included a review of historical activities on site, maintenance activities on the SWHP (as referenced to in an email to DWER on 14 October 2021) and an additional round of groundwater monitoring in March 2022 on this newly installed bore. This work prompted further testing of the shared lower liner beneath the SWHP/OWS.

The 'Actions' section includes details of the additional work planned to determine the source of mercury.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

As noted above, an additional round of groundwater monitoring was completed in March 2022 which confirmed the sampling results from November 2021 and February 2022 and levels of mercury were detected.

Work has also been progressed to determine the feasibility and requirements for completing a hydrostatic leak test on the lower liner of the SWHP/OWS. It was determined feasible to complete the hydrostatic test and, as of October 2022, the test is near completion.

An Environmental Risk Assessment by an independent third-party Environmental Consultant is also underway, as per the Section 72 (ABU220200159).

The outcomes from both scopes will then determine any future actions to be completed.

Was this non-compliance previously reported to DWER?

Section E – Details of non-compliance with licence condition

<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 13 / 4 / 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:	1 (Table 2)	Date(s) of non-compliance:	30 May 2022
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Details of non-compliance:

Non-compliance against Condition 1 as set out in Table 2: Infrastructure and equipment controls table “Concrete batching plant settlement pond: Operated with a minimum freeboard of 300 mm”. Following a significant rainfall event on 29 May and 30 May 2022, there was a freeboard exceedance of the settlement pond at the Concrete Batching Plant (CBP).

What was the actual (or suspected) environmental impact of the non-compliance?

NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.

No environmental impact occurred as a result of the freeboard exceedance of the settlement pond as the pond did not overflow.

Cause (or suspected cause) of non-compliance:

On 29 May 2022, Barrow Island received 99.4 mm of rainfall in a 24-hour period (as per BOM Daily Weather Observations). Even though the settlement pond was at a low level prior to the rainfall event, the large volume of rain and runoff from areas around the CBP, meant that the levels in the pond increased rapidly prior to the start of the morning shift on 30 May 2022.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

On 30 May 2022, the operator implemented the standard operating procedure and began to pump water from the pond into the recycled water tank.

A review is underway on the design of the settlement pond to allow management of the pond levels during an extreme weather event.

Was this non-compliance previously reported to DWER?

Yes, and

Reported to DWER verbally

Date: / /

Reported to DWER in writing

Date: 6 / 6 / 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:	14 (Table 9)	Date(s) of non-compliance:	5 October 2022
Details of non-compliance:			
Non-compliance against Condition 14, as set out in Table 9: Process Monitoring. That being the daily monitoring of wellhead pressure and A annulus pressure (kPa) at the Temporary Wastewater Injection Plant (TWIP) wells. On seven occasions since January 2022, daily monitoring of wellhead pressure and A annulus pressure at the TWIP wells was not completed as per Condition 14 and Table 9.			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – 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 seven occasions since January 2022, daily monitoring of wellhead pressure and A annulus pressure at the TWIP wells was not completed as per Condition 14 and Table 9.			
<ul style="list-style-type: none"> 30 January 2022: Limited resourcing to complete monitoring activities due to COVID impacts and reduced personnel on site 15 February 2022: Unknown 31 March 2022: Access restricted to the TWIP wells due to lighting strikes making it unsafe to access the location 17 May 2022: Limited resourcing to complete monitoring activities due to COVID impacts and reduced personnel on site 29 to 31 May 2022: Access restricted to the TWIP wells due to flooded roads making it unsafe to access the location 			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Information was shared with relevant parties on the licence requirement to ensure daily monitoring of wellhead pressure and A annulus pressure is completed in accordance with safe operating expectations for the operators.			
Updates will be made to the data collection procedure for the TWIP, to reinforce the associated licence requirement for the daily measurement of wellhead pressure and A annulus pressure.			
Note: For four of the occasions, there were severe weather conditions (e.g. lighting strikes or flooded roads) where the daily readings for wellhead pressure and A annulus pressure readings were not able to be taken as the wells could not be accessed safely. The existing licence does not currently include an allowance for the daily samples to be taken unless unsafe to do so. A request was made to DWER to acknowledge that sampling will be completed when safe to do so, until there is an opportunity to adjust the requirement during a future licence amendment. CAPL refers to the Wheatstone Licence (L9225/2019/1), where certain activities are required to be performed unless safe to do e.g. Condition 1, Table 1: "First flush sumps must be inspected prior to a cyclone... unless safe to do so".			
Was this non-compliance previously reported to DWER?			

Section E – Details of non-compliance with licence condition	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 12 / 10 / 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:	9 (Table 14)	Date(s) of non-compliance:	6 October 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 ₂ acid gas stream at the designated sample point for H ₂ S and BTEX. During July 2021, a monthly sample from the "Analyser Train 3" sample point for H ₂ S and BTEX was not completed as per Condition 9 as set out in Table 14 in Schedule 3.			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – 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:			
During July 2021, a monthly sample from the CO ₂ acid gas stream at the "Analyser Train 3" sample point for H ₂ S and BTEX was not completed as per Condition 9 as set out in Table 14 in Schedule 3. Train 3 had been shut down during the previous months as a result of a major maintenance event. The regular sampling for H ₂ S and BTEX is scheduled for the beginning of each month and had been cancelled for the previous months due to the major maintenance event. During July 2021, the AGRU Train 3 was only running intermittently, and the set sampling had not yet been reactivated, consequently, a sample was not taken. Laboratory samples have been collected for the remainder of the reporting period and were all within the licence limits, as per Condition 8, Table 5: Discharge to land limits.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Information was shared with relevant parties on the licence requirement to ensure a monthly sample is completed in accordance with licence requirements.			
A review is underway of the process for re-scheduling the monthly laboratory sample in scenarios where the sample cannot be taken on the normally scheduled date, to ensure the associated licence requirement for the monthly sample for H ₂ S and BTEX is met.			
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: 13 / 10 / 2022	

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 particular¹.

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

Signature ² :		Signature:	-
Name: (printed)		Name: (printed)	-
Position:	Gorgon Operations Manager	Position:	-
Date:		Date:	-
Seal (if signing under seal):			

¹ 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

² 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