

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 1 162 Grand Boulevard JOONDALUP WA 6027		
Reporting period:	01 July 2023 to 30 June 2024		

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: 16,789,848 tonnes • DomGas: 289.94 TJ/day • Condensate: 893,122 tonnes
52 – Electrical power generation	277.28 MW
54 – Sewage facility	340.85 m ³ /day
61 – Liquid waste facility	513 tonnes per annual period
61A – Solid waste depot	<ul style="list-style-type: none"> • 74,694 tonnes of stockpiled concrete waste • 4,289 tonnes of other solid waste

Section C – Statement of Actual Production	
73 – Bulk storage of chemicals etc	1,090 m ³
77 – Concrete batching or cement products manufacturing	7,632 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:	Condition 14, Table 9: Process Monitoring	Date(s) of non-compliance:	19 October 2023
Details of non-compliance:			
<p>A faulty pressure gauge for monitoring of A annulus pressure at the Temporary Wastewater Injection Plant (TWIP) well WDW2 resulted in monitoring not occurring as per Condition 14 and Table 9. While monitoring was occurring, there was uncertainty as to the accuracy of the data due to the pressure gauge being identified as faulty at a later date.</p> <p>Since the L9102/2017/1 amendment was issued on 31 August 2021, the TWIP wells have been included on the licence as authorised discharge points to land for wastewater with associated monitoring requirements of the A annulus pressure. Since 31 August 2021, the A annulus pressure for WDW2 has been recorded at 0 kPa.</p> <p>During maintenance of WDW2 on 10 October 2023, the A annulus was pressure tested to 690 kPa which confirmed full integrity of the tubing and the casing. Whilst using an alternative gauge the A annulus pressure was measured at 324 kPa. Following the pressure test, the original pressure gauge was returned to its position and continued to provide a 0 kPa reading.</p> <p>The fault with the gauge indicated potential uncertainty with previous pressure monitoring data.</p>			
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:			
The A annulus pressure gauge was found to be faulty resulting in potential uncertainty with previous pressure monitoring data.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>A maintenance Work Order was raised to replace the faulty pressure gauge, and this task was completed on 24 October 2023.</p> <p>An investigation was conducted to understand the fault mechanism and identify learnings related to WDW2 process monitoring. Key actions to prevent recurrence included updating relevant maintenance procedures, providing guidance to operators on the operating envelope for the wells and clarifying reporting procedures.</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: 26 October 2023	

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:	4 to 15 July 2023
Details of non-compliance:			
<p>For the calendar month of July 2023, the CO₂ online analyser on Train 1 was available for monitoring of hydrocarbon (including BTEX) for approximately 86.1 percent of that month. Between 4 July and 13 July, the analyser was intermittently unavailable or unreliable (4 July 16:50 –7 July 07:30; 11 July 21:40 –13 July 14:30). 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) using the CO₂ 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> <p>There was no upset condition in the AGRU train during these outages that would suggest that the hydrocarbon licence limit (as per Condition 8; Table 5) would have been exceeded.</p>			
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:			
The outages were a result of a loss of pressure in the purge cabinet which houses the analyser. During a loss of cabinet pressure, power supply to the analyser was cut off to maintain electrical safety in a hazardous area (EEHA ExP safety system). The purge pressure in the cabinet is maintained by the purge controller, which was not performing reliably.			
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. Rectification work on the purge controller was prioritised and completed, resulting in the analyser being back online at 07:30 on 7 July and subsequently at 14:30 on 13 July.			
A review of sparring of the purge controller was completed to ensure appropriate components were available on site.			
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: 18 July 2023	

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:	25 and 26 June 2024
Details of non-compliance:			
On two occasions in June 2024 (25 and 26 June 2024), daily monitoring of wellhead pressure and A annulus pressure for WDW1 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:			
Access was restricted to the TWIP well, WDW1 on these dates due to crane operations making it unsafe to access the location.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The missed readings were identified on the next days and relevant personnel were notified as per established process.			
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: 4 July 2024	

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:	29 March 2024
Details of non-compliance:			
On 29 March 2024, daily monitoring of A annulus pressure and wellhead pressure at WDW1 and WDW2 was not completed as per Condition 14 and Table 9 as the communications to the TWIP equipment were faulty and the pump was not functional. The missed readings were identified during collation of data for the 2024 Annual Environmental Report for L9102/2017/1.			
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:			
The communications to the TWIP equipment were faulty and the pump was not functional			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Communications to the TWIP were restored so injection could recommence, pressure gauge readings were taken the next day (30 March 2024).			
CAPL has conducted further investigation into monitoring options and is currently trialling wireless gauges to provide remote monitoring capability for monitoring of the A annulus and wellhead pressure of the TWIP wells.			
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: 22 October 2024	

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 13: Schedule 3 (Monitoring)	Date(s) of non-compliance:	February 2024
Details of non-compliance:			
Analysis for pH and TSS in February 2024 from the wastewater disposal stream to Z-WI2 was not completed, as per Condition 9 as set out in Table 13 in Schedule 3. For February 2024, an unknown error caused pH and TSS to be excluded from the monthly analysis suite. The missed results were identified during collation of data for the 2024 Annual Environmental Report for L9102/2017/1.			
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 due to this non-compliance.			
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 and analysis requirements. For February 2024, an unknown error caused the pH and TSS analysis 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:			
The monthly licence sampling and analysis requirements were reviewed within LIMS to verify the existing configuration and identify any revisions required. All required sampling and analysis had been completed for the remainder of the reporting period.			
Work to prevent missed sampling events is currently underway. This includes establishment of an automated email from the Production Information Management System, prior to the end of the month, if no TRH, pH or TSS sampling result is detected. This notification would then prompt a review and completion of the monthly sampling and analysis.			
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: 22 October 2024	

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 ¹ .			
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:		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.