

## Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V Division 3*

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

Department of Water and Environmental Regulation  
 Locked Bag 10  
 Joondalup DC WA 6919

Section A – Licence details			
Licence number:	L9225/2019/1	Licence file number:	DER2019/000441
Licence holder name:	Chevron Australia Pty Ltd		
Trading as:	Chevron Australia Pty Ltd		
ACN:	086 197 757		
Registered business address:	250 St Georges Terrace PERTH WA 6000		
Reporting period:	01 / 08 / 2020 to 31 / 07 / 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 in 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
Category 10: Oil or gas production from wells	LNG: 8,874,693 tonnes
Category 34: Oil or gas refining	Condensate: 1,486,206 tonnes (Note: based on condensate production for entire LNG facility)
Category 52: Electric power generation	43 MW (Note: based on total electric power generation for entire LNG facility)

**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
NA	NA

**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:		Date(s) of non-compliance:	
1, Table 1		21 August 2020	

Details of non-compliance:

Non-compliance with Condition 1, Table 1 Operational Requirements for storage drums to maintain sufficient capacity to store refrigerant inventory of LNG Train 1 and 2 during normal operating conditions (Propane Storage Drums)

Propane Storage Capacity dropped below licence requirements as a result of receiving additional inventory.

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.

Cause (or suspected cause) of non-compliance:

The Propane storage drum commenced receiving additional inventory on 20 August 2020. The additional inventory resulted in the volume of propane in the storage drum increasing to a point where the drum did not have sufficient capacity

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

Operations were consulted on 21 August 2020 reinforcing the purpose of the Propane and Ethylene Inventory Tool which monitors and automates refrigerant inventories. The tool makes notification when orders are required to top-up refrigerant to the normal operating level and what the maximum volume that should be ordered to maintain sufficient capacity to store the refrigerant inventory of one LNG train. In addition, on 21 August 2020 a process for reviewing the inventory tool was implemented, including review prior to ordering propane or ethylene.

Non-compliance was reported to DWER on 27 August 2020 (refer ABU200800667).

Was this non-compliance previously reported to DWER?

Yes, and

Section E – Details of non-compliance with licence condition	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 27 / 8 / 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:	1, Table 1	Date(s) of non-compliance:	25 January 2021
Details of non-compliance:			
<p>Non-compliance with Condition 1, Table 1 Operational Requirements tank bunding (Amine Surge Tank)</p> <p>Whilst washing down a vessel inside the bund area for the Amine surge tank, a flow of water outside of the bund wall was observed.</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>			
<p>No environmental impact. There was a minor leak of wash water outside of the bund to hard stand/drainage system.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Minor leak due to bund integrity failure.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Following detection, operators immediately drained the remaining wash water within the bund to the primary treatment system.</p> <p>Work to reinstate the bund integrity was completed and work order closed on 23 July 2021.</p> <p>Non-compliance was reported to DWER on 4 February 2021 (refer ABU210902318).</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: 4 / 2 / 21	

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 1	Date(s) of non-compliance:	3 March 2021
Details of non-compliance:			
<p>Non-compliance with Condition 1, Table 1 Operational Requirements for the Low Pressure Flare System.</p> <p>Unplanned flaring due to IPL shutdown of stabilizer overheads gas compressors.</p> <p>Condensate stabilisers 2 and 3 were in normal operation, with both C-1121 and C-1131 overhead gas compressors running. Due to a rain event, both overhead gas compressors went into low temperature alarms across all 3 stages which required them to be shutdown. Overheads gas, instead of being routed to LNG trains 1 &amp; 2, was routed to the low pressure flare system. Unable to re-start C-1121 and C-1131 until rain ceased.</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> <p>There was no environmental impact. There was an incidental increase in emissions from the low pressure flare.</p>			
Cause (or suspected cause) of non-compliance:			
<p>During a rain event gas to the compressors, is cooled to the extent that liquid can form in the gas. The extent of cooling depends on the severity and duration of the rain. The design allows for this to occur for a limited time after which the compressors must be stopped in order to prevent a process safety risk.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The interim solution for the stabiliser compressors comprises running the compressors in superheat mode in lieu of the risk of liquid formation in the respective suction stages and associated damage to the compressors.</p> <p>Non-compliance was reported to DWER on 9 March 2021 (refer ABU210300160).</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 / 03 / 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:	1, Table 1	Date(s) of non-compliance:	4 May 2021
Details of non-compliance:			
<p>Non-compliance with Condition 1, Table 1 Operational Requirements for the Low Pressure Flare System.</p> <p>Unplanned flaring due to IPL shutdown of stabilizer overhead gas compressors.</p> <p>Condensate stabilisers 1,2 and 3 were in normal operation, with C-1111, C-1121, and C-1131 overheads gas compressors running. Due to a rain event, C-1113 overhead gas compressor went into low temperature alarms across all 3 stages which required it to be shutdown. Overheads gas, instead of being routed to LNG trains 1 &amp; 2, was routed to the low pressure flare system. Unable to re-start C-1131 until rain ceased.</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> <p>There was no environmental impact. There was an incidental increase in emissions from the low pressure flare.</p>			
Cause (or suspected cause) of non-compliance:			
<p>During a rain event gas to the compressors, is cooled to the extent that liquid can form in the gas. The extent of cooling depends on the severity and duration of the rain. The design allows for this to occur for a limited time after which the compressors must be stopped in order to prevent a process safety risk.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The interim solution for the stabiliser compressors comprises running the compressors in superheat mode in lieu of the risk of liquid formation in the respective suction stages and associated damage to the compressors.</p> <p>Non-compliance was reported to DWER on 11 May 2021 (refer ABU210500553)</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: 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:	1, Table 1	Date(s) of non-compliance:	8 June 2021
Details of non-compliance:			
<p>Non-compliance with Condition 1, Table 1 Operational Requirements for the Low Pressure Flare System.</p> <p>Unplanned flaring due to IPL shutdown of stabilizer overhead gas compressors.</p> <p>Condensate stabilisers 2 and 3 were in normal operation, with C-1121, and C-1131 overhead gas compressors running. Due to a rain event, C-1112 &amp; C-1113 overhead gas compressor went into low temperature alarms across all 3 stages which required them to be shutdown. Overheads gas, instead of being routed to LNG trains 1 &amp; 2, was routed to the low pressure flare system. Unable to re-start both C-1121 &amp; C-1131 until rain ceased.</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> <p>There was no environmental impact. There was an incidental increase in emissions from low pressure flare.</p>			
Cause (or suspected cause) of non-compliance:			
<p>During a rain event gas to the compressors, is cooled to the extent that liquid can form in the gas. The extent of cooling depends on the severity and duration of the rain. The design allows for this to occur for a limited time after which the compressors must be stopped in order to prevent a process safety risk.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The interim solution for the stabiliser compressors comprises running the compressors in superheat mode in lieu of the risk of liquid formation in the respective suction stages and associated damage to the compressors.</p> <p>Non-compliance was reported to DWER on 16 June 2021 (refer ABU210600295).</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: 16 / 06 / 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:	1, Table 1	Date(s) of non-compliance:	25 June 2021
Details of non-compliance:			
<p>Non-compliance with Condition 1, Table 1 Operational Requirements for the Low Pressure Flare System.</p> <p>Unplanned flaring due to IPL shutdown of stabilizer overhead gas compressors.</p> <p>Condensate stabiliser 3 was in normal operation, with C-1131 overhead gas compressor running. Due to ambient conditions, C-1131 overhead gas compressor went into low temperature alarms across all 3 stages which required them to be shutdown. Overheads gas, instead of being routed to LNG trains 1 &amp; 2, was routed to the low pressure flare system.</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> <p>There was no environmental impact. There was an incidental increase in emissions from the low pressure flare.</p>			
Cause (or suspected cause) of non-compliance:			
<p>During a rain event gas to the compressors, is cooled to the extent that liquid can form in the gas. The extent of cooling depends on the severity and duration of the rain. The design allows for this to occur for a limited time after which the compressors must be stopped in order to prevent a process safety risk.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The interim solution for the stabiliser compressors comprises running the compressors in superheat mode in lieu of the risk of liquid formation in the respective suction stages and associated damage to the compressors.</p> <p>Non-compliance was reported to DWER on 30 June 2021 (refer ABU210700079).</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: 30 / 06 / 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:	3, Table 3	Date(s) of non-compliance:	7 June 2021
Details of non-compliance:			
<p>Non-compliance with Condition 3, Table 3 Discharge to Air Limits (Marine Flare System)</p> <p>Whilst progressing the gas up of the Energy Navigator, black smoke from the marine flare was emitted during the process.</p> <p>Flaring was required through the marine flare system while removing inert gas from a gas up ship that arrived on 6 June for loading. The flaring resulted in dark smoke (above Ringelmann 3) for a period between 2:20pm and 4:40pm on 7 June.</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 a short duration of dark smoke with no specific resultant environmental impact.			
Cause (or suspected cause) of non-compliance:			
During the gas removal process, operations undertaken to suppress dark smoke were not fully effective.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The presence of dark smoke was identified and monitored, and in response, operators made process changes to reduce the duration of dark smoke. Once the gas was within specification, it was diverted to the boil off gas compressors at the earliest opportunity.</p> <p>Non-compliance was reported to DWER on 11 June 2021 (refer ABU210600208).</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: 11 / 06 / 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	Date(s) of non-compliance:	02/02/2021 – 10/02/2021
Details of non-compliance:			
During February 2021 the hourly averaged percentage availability for all parameters recorded at the AQMS was not continuous (reduced to 67.9%), due to a power supply interruption impacting instrumentation between 2 February 2021 and 10 February 2021.			
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:			
Power failure at the AQMS.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
No adverse effects from the event. The AQMS is connected to grid power, and it is not feasible for it to have its own stand-alone backup power supply.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> No			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

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:	17	Date(s) of non-compliance:	14 June 2021
Details of non-compliance:			
During DWER audit inspection on 14 June 2021 inspectors determined that the laboratory results for discharges to Pond A-F were recorded in Total Petroleum Hydrocarbon (TPH) as opposed to Total Recoverable Hydrocarbon (TRH) as required by condition 17 of the licence.			
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:			
Incorrect use of TPH instead of TRH in publishing of laboratory results, under NATA accreditation.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The laboratory procedure in use by the Wheatstone laboratory and accredited by NATA referred to TPH. The results from the procedure are consistent with the definition of TRH. As such, Chevron updated its procedure to refer to TRH. NATA also updated the Chevron laboratory accreditation to reflect TRH, rather than TPH.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes			
<input checked="" type="checkbox"/> Reported to DWER verbally		Date: 14/06/2021	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

<b>Section F – Declaration</b>			
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)	Michael Stogner	Name: (printed)	
Position:	Wheatstone 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.