

From: [REDACTED]
Sent: Wednesday, 27 May 2020 4:28 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Change to NOPSEMA Environment focal point [DLM=For-Official-Use-Only]
Attachments: Minutes - NOPSEMA - Woodside SLM 2- 1 May 2020.docx

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Good afternoon [REDACTED]

I hope this email finds you both well.

There have been some recent changes in the Environment Division, one of which is that I have moved to a role in the Spill Risk team. This has also meant that several roles and responsibilities have been re-assigned, including my role as focal point coordinator for Woodside.

[REDACTED] will be your new focal point coordinator going forward and [REDACTED] the new Spill Risk team member. [REDACTED] and [REDACTED] will be continuing to provide support as Woodside focal team members

It has been a pleasure working with you both over the past 15 months and no doubt I will continue to see you from time to time. I've given [REDACTED] a detailed handover so hopefully the transition will be smooth. However if you have any questions I'm still here to help, so please feel free to call me.

I've also attached the updated minutes from the last strategic meeting.

Thanks very much and take care.

Cheers

[REDACTED]



[REDACTED]

National Offshore Petroleum Safety and Environmental Management Authority
[REDACTED] | **W:** nopsema.gov.au

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 NOPSEMA	<h1>MEETING MINUTES</h1>	Titleholder: Woodside
		Time: 14:00 – 15:00
		Date: 1 May 2020
		Location: Teleconference

Meeting called by:	NOPSEMA & Woodside	File Ref:	A729561
Attendees			
NOPSEMA		Titleholder	
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Apologies: -			
Meeting Objective			
Objective of the meeting	Titleholder strategic meeting to <ul style="list-style-type: none"> - Share information on current strategies in response to COVID-19 - Resolve any issues associated with regulatory activities being experienced 		

Agenda/Minutes	
No	Item
1	Agenda Item 1 – Introduction (5 mins)
1.1	<ul style="list-style-type: none"> ▪ Introduction of meeting attendees, check call quality
1.2	<ul style="list-style-type: none"> ▪ Review of action items from previous meeting – ■ provided a progress update on the 3 open action items. <p>Note: Action table below has been updated to reflect actions taken at this meeting.</p>
2	Agenda Item 2 – COVID-19 response (20 mins)
2.1	<ul style="list-style-type: none"> ▪ Discuss/share information on current strategies in response to COVID-19 and potential impact on business continuity and risk management ▪ Discuss impact on regulatory activities - EP submissions prioritisation and conduct of inspections <ul style="list-style-type: none"> a. ■ provided an update on Woodside’s strategies in response to COVID-19. Operational sites are on now a 2-4-2 roster. 1st 2 weeks is precautionary isolation, before going onsite. Next move is to reduce precaution time for WA residents. PCR swab testing is being undertaken with input from health authorities. Research program agreed with Curtin Uni. Intention is for the test to reduce the 2 weeks precautionary isolation to bring this down to 7 days for offshore personnel. WEL’s Perth office (MY) is working to a red – blue team roster. b. ■ provided an update on NOPSEMA’s strategies in response to COVID-19 including highlighting: <ul style="list-style-type: none"> ▪ NOPSEMA have set up a COVID-19 taskforce to coordinate NOPSEMA’s approach to regulating offshore oil and gas industry during the COVID-19 pandemic to ensure effective and efficient implementation of the COVID-19 Compliance Strategy. ▪ NOPSEMA is conducting a series of COVID-19 Consequence Inspections across industry to determine how industry are continuing to manage areas of major accident or environmental risk, to ensure appropriate management of change by duty holders and to gain a greater understanding of the incidental pressures industry is under at this time. NOPSEMA inspected Woodside on Wednesday 29 April. ■ asked whether there was any early feedback from that inspection.

Agenda/Minutes

No	Item
	<ul style="list-style-type: none"> ▪ [redacted] stated that she was part of the inspection from an environmental perspective and that there were no technical issues. [redacted] discussed the process ahead for reporting on the industry wide findings gained from the COVID-19 consequence inspections.
3	Agenda Item 3 – Titleholder and NOPSEMA Feedback items (30 mins)
3.1	<ul style="list-style-type: none"> ▪ Opportunities for further focus/feedback (comms, advice, regulatory aspects, performance) (Both) <ul style="list-style-type: none"> a. Scarborough OPP process – learnings discussion <ul style="list-style-type: none"> • Agreed that this is not the forum to have an in-depth discussion on learnings, and that a separate meeting will be organised for discussion of what we think went well and what could be done differently for future OPP assessments. [redacted] requested a face to face discussion (if possible) later in Q2, possibly towards end of June. [redacted] agreed. See ACTION v below. [redacted] added that insights gained from process, including Scope 3 emissions will be fed by WEL into DoAWE’s current 10 yr review of EPBC Act. • [redacted] provided some high level feedback on the OPP assessment, including the importance of effective communication on both sides; a critical review of documents prior to submitting to NOPSEMA – including QA/QC especially in light of documents being published; and addressing requirements of EPBC Act statutory instruments in submissions. • [redacted] raised the concern that [redacted] is not sure that NOPSEMA and WEL are aligned in terms of how EPBC Act requirements (e.g. marine parks, recovery plans) are treated in regulatory submissions/assessment documentation, which may have implications for the Browse EIS. Specifically the proposed activities cannot include things that are inherently incompatible with recovery plans. Agreed that an EPBC protected matters discussion should be held separately. See ACTION iv below – in the next week or so, have a discussion pre- EPBC Act review submission. Purpose of meeting is for “Clarifying the relevance and application of EPBC Act instruments.” • [redacted] provided an early flag for the differences between EP and OPP requirements. Modelling thresholds used in the Scarborough OPP were not consistent with NOPSEMA’s Bulletin #1 – Oil spill modelling. <i>Supporting note: As communicated in the Statement of Reasons, the OPP used entrained and dissolved hydrocarbon exposure values (500 ppb) derived from 2013 ecotoxicity testing of Marine Diesel for the evaluation of environmental impacts and risks. While this was accepted by NOPSEMA as part of an OPP, it will need to be further reviewed at the EP development stage as use of these exposure values is unlikely to meet the requirements of the Environment Regulations. For further information please refer to NOPSEMA Bulletin #1 – Oil spill modelling.</i> • [redacted] provided some positive feedback – that while there were lots of tricky issues during the OPP assessment process it was good to see the professional manner upheld by NOPSEMA and WEL in working together to seek resolution on these issues in a timely way. b. OPGGSA Section 572– compliance - recent publication of draft policy and EP decisions <ul style="list-style-type: none"> • [redacted] provided the context and highlights from the draft policy which is currently out for public comment. [redacted] confirmed that WEL have a team working on a response to the draft policy by 9th June. [redacted] invited WEL to seek clarification on parts of the policy and discussed that implementation of the policy will be across the board (i.e. applicable for all activities no matter the lifecycle stage). • [redacted] raised some points of clarification including NOSPEMA’s expectation for removal when infrastructure is no longer to be used? [redacted] clarified that the legislation actually specifies that equipment that is neither used nor to be used is required to be removed. While it is understandable that immediate removal may not be practical, planning for removal needs to be timely. Advice is to start preparing well in advance for removal, not when already in cessation. [redacted] confirmed that submissions for operational activities need to outline the plans for removal, including timeframes but does not need to describe the activity of removal. Also need to include a list of inventory. • [redacted] queried whether there is a possibility of Operations EPs being called in to address this gap? [redacted] noted that this content was flagged in the 5 year revision of Operations EPs information paper and that the draft s572 policy includes administrative policy for transition provision. • [redacted] provided some positive feedback – that it was good to see progress on P&A of well heads being included in submissions. The Echo Yodel Decommissioning EP submitted includes the P & A of 3 wells.

Agenda/Minutes	
No	Item
	<p>Also the Nganhurra Cessation EP submitted makes a commitment and has timeframes for the P & A of the Enfield wells.</p> <p>c. NGA OMR – Sea Dumping and EP Assessment process</p> <ul style="list-style-type: none"> █ raised a concern that WEL are seeing an overlap of regulatory requirements/ duplication when it comes to sea dumping. As the processes are running in parallel, instead of WEL having to re-work submissions it would be good to have clear expectations set between agencies. Both WEL and NOPSEMA are committed to ongoing engagements with DoAWE. █ provided an update on the conversation held with DoAWE this morning. WEL advised that Recfishwest will be applying for the Sea Dumping Permit, not WEL. ACTION vii raised for WEL and NOPSEMA to discuss with DoAWE the information requirements for the Sea Dumping Permit and NGA EP content requirements to explore opportunities for alignment. █ identified that there would be value in discussing the demonstration of acceptable impacts for NGA equipment removal. █ agreed to hold further discussions with NOPSEMA.
4	Agenda Item 4 – Closing (5 mins)
4.1	<ul style="list-style-type: none"> █ summarised actions agreed (see table below)
4.2	<ul style="list-style-type: none"> Next meeting date 30 June 2020, 9am.

Agreed Actions

Agreed Actions					
No.	Initiated	What	Who	When	Status
i.	3/4/19	WEL to further consider involvement in NERA's collaborative EP for seismic	Woodside	3/5/19	Open. In progress. Meeting to be held between WEL █ and █ and NERA next Monday (4/5/2020).
ii.	17/12/19	WEL to provide agenda for discussion on Bio-acoustic management strategy and set up a meeting time.	Woodside	18/02/2020	Open. In progress, WEL █ █
iii.	20/3/2020	WEL to organise a separate discussion regarding well head EPs and related titles issues	Woodside █	20/5/2020	Open. In progress - Filenote on well heads and related EPs prepared and currently being reviewed internally
iv.	1/5/2020	WEL to organise a meeting with NOPSEMA in the next week or so to clarify the relevance and application of EPBC Act instruments.	Woodside █	8/5/2020	Open
v.	1/5/2020	WEL to organise a meeting with NOPSEMA (preferably a face to face discussion if possible) later in the year (~ end of June) to share and discuss reflections on the OPP assessment process for Scarborough.	Woodside	22/5/2020	Open

Agreed Actions					
No.	Initiated	What	Who	When	Status
vi.	1/5/2020	WEL to organise a meeting with NOPSEMA in the next 2 weeks to discuss acceptable levels demonstration in the NGA Cessation EP.	Woodside	8/5/2020	Closed. ██████████ met with ██████████ and ██████████ on 14/5/2020.
vii.	1/5/2020	WEL and NOPSEMA to discuss with DoAWE the information requirements for the Sea Dumping Permit and NGA EP content requirements to explore opportunities for alignment.	Woodside	12/6/2020	Open