

Our ref: ID: 824 - A917844
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Mr Michael Jacobsen
Project and Operations General Manager
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Dear Mr Jacobsen

COOPER ENERGY GENERAL DIRECTION 824 – 2022 ANNUAL PROGRESS REPORT FOR DECOMMISSIONING OF THE BASKER, MANTA, GUMMY FIELDS

Thank you for the submission of the Baser Manta Gummy (BMG) Decommissioning Annual Report 2022 on 14 December 2022 as required by Direction 6 of General Direction 824. NOPSEMA has conducted a review of this report and is satisfied that the BMG Closure Project Annual Progress Report 2022 provides an adequate progress report detailing planning towards, and progress with, undertaking the actions required by General Direction 824. Cooper Energy must now publish this report on its website within 14 days of the date of this letter. Please ensure that it is published in a clear and accessible location on the website.

I would also like to take this opportunity to reiterate NOPSEMA's expectations of all non-producing facilities that are subject to NOPSEMA's increased compliance efforts (Tier 1 facilities under NOPSEMA's Decommissioning Compliance Plan³) as well as provide advice specific to the BMG closure project.

Consultation with relevant persons

By now, all Titleholders are aware that the appeal decision on the *Santos NA Barossa Pty Ltd v Tipakalippa [2022] FCAFC 193* made by the Federal Court of Australia on 2 December 2022 regarding requirements for consultation in accordance with the Environment Regulations. NOPSEMA expects titleholders to make all reasonable efforts to continue planning for decommissioning in parallel with consultation.

Due to the likely impact additional consultation may have on timelines for all projects, I expect Cooper Energy to ensure that sufficient resources and prioritisation is given to the BMG closure project to ensure that consultation consistent with the requirements of the Environment Regulations (as clarified by the case law referenced above) can be completed in a timely way that does not jeopardise the timeframes for final completion of decommissioning, as required by General Direction 824.

Prioritisation and resourcing

More generally, I expect Cooper Energy to ensure that sufficient resources, focus, and prioritisation is given to the project, including implementation of parallel work streams and/or providing additional resources to the project, if necessary, in order to meet the requirements of General Direction 824.

³ See Decommissioning Compliance Plan (nopsema.gov.au)

At this stage it is expected that there is significant progress of supporting studies, contracting of vessels and rigs, procurement of equipment and risks are understood and being managed, regardless of the timeframe for any Environment Plan assessment or other approval decision.

Future decommissioning workload

Beyond the BMG project I note that there will be additional requirements for decommissioning for Cooper Energy over the next five plus years as other facilities, or parts of those facilities, reach the end of production. NOPSEMA expects Cooper Energy to actively seek and pursue opportunities for progressive decommissioning of its facilities in order to maintain compliance with s572 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006*⁴ and meet good industry practice as established by international standards.

Final remarks

We note that most permissioning documents for the BMG closure project have either been accepted or are currently under assessment. We encourage Cooper Energy to work collaboratively with industry to address common issues, including the need to increase the capability and capacity of Australia's waste and recycling industry to handle the type and volume of material produced by offshore decommissioning.

If you have any questions regarding the information above, please do not hesitate to contact David Christensen by email (david.christensen@nopmsea.gov.au) or phone on (08 6188 8700)

Yours sincerely

Cameron Grebe
Head of Division – Environment, Renewables & Decommissioning
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09 March 2023

⁴ Please refer to [N-00500-PL1903 - S572 Maintenance and Removal of property \(A720369\).pdf \(nopsema.gov.au\)](#) and further information provided in [Planning for proactive decommissioning \(nopsema.gov.au\)](#)