

Our ref: RMS ID 831: A916055
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Mr Michael Price
Acting Executive Director – Australian Operations
Woodside Energy (Victoria) Pty Ltd
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Mr Michael Jacobsen
Project and Operations General Manager
Cooper Energy (MF) Pty Ltd
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Mike.Price@woodside.com

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Dear Mr Price and Mr Jacobsen

RE GENERAL DIRECTION 831 - ANNUAL PROGRESS REPORT FOR 2022 – MINERVA DECOMMISSIONING

Thank you for the submission of the Minerva Decommissioning Annual Report 2022 on 22 December 2022 as required by Direction 6 of General Direction 831. NOPSEMA has conducted a review of this report and is satisfied that the Minerva Decommissioning Annual Report 2022 (Rev 1) provides an adequate progress report detailing planning towards, and progress with, undertaking the actions required by General Direction 831. Woodside and Cooper Energy must now publish this report on their respective websites 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 Plan¹) as well as provide advice specific to the Minerva 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 Woodside, and Cooper Energy to ensure that sufficient resources and prioritisation is given to the Minerva decommissioning 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 831.

¹ See [Decommissioning Compliance Plan \(nopsema.gov.au\)](https://www.nopsema.gov.au)

Prioritisation and resourcing

More generally, I expect both companies 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 831 and in particular, completing well P&A and removal of all infrastructure no later than 30 June 2025.

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 Minerva decommissioning project, I note that there will be additional requirements for decommissioning, either jointly or separately for Woodside and Cooper Energy over the next five plus years as other facilities, or parts of those facilities, reach the end of production. NOPSEMA expects all companies to actively seek and pursue opportunities for progressive decommissioning of its facilities to maintain compliance with s572 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006*² and meet good industry practice as established by international standards.

Final remarks

We encourage Woodside and 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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02 March 2023

² 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 \(nopsema.gov.au\)](#)