



Licence Number L5765/1994/11

Licence Holder AWE Perth Pty Ltd

ACN 009 204 031

File Number: DER2014/001481-1

Premises Dongara Production Facility
Department of Mines and Petroleum Licence L1 and L2
Brand Highway, Yardarino
DONGARA, WA 6525
Portion of Lots 1 and 2 on Plan 41317

Date of Report 26/11/2019

1. Definitions and interpretation

Definitions

In this Amendment Report, the terms in Table 1 have the meanings defined.

Table 1: Definitions

Term	Definition
ACN	Australian Company Number
Amendment Report	refers to this document
Category/ Categories/ Cat.	categories of Prescribed Premises as set out in Schedule 1 of the EP Regulations
CEO	means Chief Executive Officer. CEO for the purposes of notification means: Director General Department Administering the <i>Environmental Protection Act 1986</i> Locked Bag 10 JOONDALUP DC WA 6027 info@dwer.wa.gov.au
Delegated Officer	an officer under section 20 of the EP Act
Department	means the department established under section 35 of the <i>Public Sector Management Act 1994</i> and designated as responsible for the administration of Part V, Division 3 of the EP Act.
DWER	Department of Water and Environmental Regulation
EP Act	<i>Environmental Protection Act 1986</i> (WA)
EP Regulations	<i>Environmental Protection Regulations 1987</i> (WA)
Existing Licence	The Licence issued under Part V, Division 3 of the EP Act and in force prior to the commencement of and during this Review
Licence Holder	AWE Perth Pty Ltd
Prescribed Premises	has the same meaning given to that term under the EP Act.
Premises	refers to the premises to which this Amendment Report applies, as specified at the front of this Amendment Report.
Revised Licence	the amended Licence issued under Part V, Division 3 of the EP Act, with changes that correspond to the assessment outlined in this Amendment Report.

Term	Definition
Risk Event	as described in <i>Guidance Statement: Risk Assessment</i>

2. Amendment Description

The following guidance statements have informed the assessment and decision outlined in this Amendment Report.

- *Guidance Statement: Regulatory Principles (July 2015)*
- *Guidance Statement: Setting Conditions (October 2015)*
- *Guidance Statement: Land Use Planning (February 2017)*
- *Guidance Statement: Licence Duration (August 2016)*
- *Guidance Statement: Decision Making (February 2017)*
- *Guidance Statement: Risk Assessment (February 2017)*
- *Guidance Statement: Environmental Siting (November 2016)*

Additional documents used to inform the decision are listed in Appendix 1.

2.1. Purpose and scope of assessment

DWER received an application for a licence (L5765/1994/11) amendment on 25 September 2019 to alter the existing premises boundary.

In addition to the above the licence holder has also requested for the frequency of flow lines inspection to align with the standard industry best practice (licence condition 3.7.1). The licence holder has requested for flow line visual checks to be completed annually instead of weekly.

The licence amendment application details that the Dongara Gas Field Production Facilities (DPF and 30 Group) are currently partially shut-in and no longer produces or exports natural gas. The key activities at DPF include:

- condensate Storage and Loading System;
- wastewater treatment, storage and disposal;
- office and workshop activities;
- central control room for XPF;
- ground water extraction;
- waste storage and chemical management; and
- all flowlines are currently suspended or depressurised and disconnected, with the exception of flowlines that connect the horizontal storage tanks to the Dongara Water Disposal Well, and flowlines that connect condensate storage tanks to unloading / export facilities.

The Delegated Officer has also noted that the registered address of the facility has now changed. AWE Perth Pty Ltd is a wholly owned subsidiary of AWE Limited (trading as AWE). AWE is now a wholly owned subsidiary of Mitsui & Co. Ltd (trading as MEPAU). There will be no changes to the ownership details, company name or ACN though. The registered office details will be amended only.

Table 2 lists the documents and information provided with the amendment application and submitted as part of the assessment process.

Table 2: Licence amendments

Document/information description	Date received
Application form (amendment) signed by operations manager of MEPAU and attached supporting documentation	25 September 2019

The Delegated Officer considers that the alteration of the prescribed premises and annual flow line instead of weekly will not increase the risk profile of the Premises. The delegated Officer is also satisfied that discharges will be adequately regulated by the Environmental Protection (Unauthorised Discharges) Regulations 2004 and has therefore decided to grant the amendment.

The following amendments to the licence have been made:

- prescribed boundary map has been updated;
- Table 3.7.1 has been amended to allow the licence holder to carry out annual visual leak check of flow lines; and
- Registered address details updated.

2.2. CEO Initiated amendment

The CEO in applying the above requested amendment, issued a revised licence also consolidating changes made under Amendment Notice issued on 29 April 2016 and on 20 October 2016 (as detailed in the instrument log table below). The obligations of the Licensee have not changed in making this consolidating amendment. During the consolidation of the amendment notices, DWER has not undertaken any additional risk assessment of the Premises.

In applying the above requested amendment The CEO has also

- updated the expiry date to align with the 2016 amended expiry date;
- included the new registered business address for the Premises on the front page of the Licence;
- updated the definitions in the Licence;
- updated the style and appearance of the Licence;
- updated the Licence conditions to reflect wording in current licence template. The word "Licensee" was removed from the licence and the word "Licence Holder" was added to the licence instead; and
- deleted the redundant AACR form set out in attachment 2 of the previous licence and advise the Licensee to obtain the form from the Department's website.

3. Amendment history

Table 3 provides the amendment history for L5765/1994/11.

Table 3: Licence amendments

Instrument log		
Instrument	Issued	Description

L5765/1994/9	21/02/2008	Licence re-issue
L5765/1994/10	24/03/2011	Licence re-issue
L5765/1994/11	06/03/2014	Licence re-issue and converted into the latest format
L5765/1994/11	29/04/2016	Notice of Amendment: to extend the expiry date of the Licence
L5765/1994/11	20/10/2016	Notice of amendment: to remove groundwater monitoring locations DPF NW and 30 GROUP SE
L5765/1994/11	26/11/2019	Amendment to alter the existing premises boundary, change flow line inspection frequency from weekly to annually and update registered address details. Amendment was granted in the form of a revised licence, including consolidation of amendment notice issued on 29 April and 20 October 2016.

4. Location and receptors

Table 4 below lists the relevant sensitive land uses currently in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

Table 4: Receptors and distance from activity boundary

Residential and sensitive premises	Distance from Prescribed Premises
Residential premises	Approximately 2.7 km from the facilities

Table 5 below lists the relevant environmental receptors in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

Table 5: Environmental receptors and distance from activity boundary

Environmental receptors	Distance from Prescribed Premises
Irwin River	Approximately 400m from the facility
Ejarno Spring	Approximately 10 km from the facility
Beekeepers Nature Reserve	Approximately 6.6 km
Yardanogo Nature Reserve	Approximately 9 km from the facility
Environmentally Sensitive Area	Approximately 9 km from the facility
Groundwater	Depth to groundwater encountered at approximately 11.8m to 24.95m below ground level (based on SWL information from the Dongara Production Facility)
Public Drinking Water Source Area	Allanooka-Dongara Water Reserve is located approximately 7 km to the north of the facility

5. Risk assessment

Table 6 below describes the Risk Events associated with the amendment consistent with the *Guidance Statement: Risk Assessments*. This table identifies whether the emissions present a material risk to public health or the environment and outlines relevant regulatory controls.

Table 6: Risk assessment for proposed amendment during operation

Risk Event				Consequence rating ¹	Likelihood rating ¹	Risk ¹	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Source/Activities*	Potential emissions	Potential receptors, pathway and impact	Applicant controls					
Cat 10: Oil or gas Emissions from damaged/ cracked flow lines	Natural gas & condensate discharge-flow line leaking	No residential premises in close proximity.	<p>According to the Licence holder</p> <ul style="list-style-type: none"> the DPF flow lines are constructed of carbon steel, have a design life of 25 years, have been positively isolated from the wellheads and preserved; shut off valves are installed on the horizontal storage tank containing material in the event of system failure/issue (observed); and the DPF All flowlines are currently suspended or depressurised and disconnected, with the exception of flowlines that connect the horizontal storage tanks to the Dongara Water Disposal Well, and flowlines that connect condensate storage tanks to unloading / export facilities. 	<p>Minimal onsite impact</p> <p>Specific Consequence Criteria (for environment) met</p> <p>Slight</p>	<p>The risk event will probably not occur in most circumstances</p> <p>Unlikely</p>	Low	<p>The Delegated Officer considers that:</p> <ul style="list-style-type: none"> annual flow line inspection is the standard industry practice, and Due to the minimal activity on site (restricted to condensate export and minor gas processing), minimal quantities of environmental hazardous materials are processed onsite; and therefore is satisfied that the Risk Event will be adequately managed. 	<p>Existing Licence Conditions</p> <ul style="list-style-type: none"> 1.2.1 relating to unauthorized emission; and 1.3.1 relating to pipelines equipped with automatic cut-outs in the event of a pipe failure. <p>The Delegated Officer also considers that the provisions of section 72 of the EP Act is sufficient to regulate emissions as a result of an emergency.</p>

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the Department's Guidance Statement: Risk Assessments (February 2017)

6. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a licence amendment will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

6.1. Summary of amendments

Table 7 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the amendment process.

Table 7 Licence amendments

Condition No.	Proposed amendments
NA	Updated the format and appearance of the Licence.
Front page	Updated the expiry date to align with the 2016 amended expiry date.
Definitions	Definitions updated to reflect department name changes and add some new definitions.
1.2.2 – 2.4.1, 2.6.1 – 2.7.1, 3.1.1 – 3.4.1, 3.7.1 – 3.8.1 & 5.1.2 – 5.3.1	Licence conditions updated to reflect wording in current licence template. The word "Licensee" has been removed and the word "licence holder" was added instead to the licence.
Table 3.7.1	Visual flow line leak check frequency changed from weekly to annually.
Table 3.8.1	Updated to align with the 20 October 2016 Amendment Notice.
Schedule 2	Deleted the redundant AACR form.
Schedule 1	Prescribed premises boundary map updated.

6.2. Licence Holder comments

The Licence Holder was provided with the draft Amendment Report on 22 November 2019 for review and comment. Comments received from the Licence Holder have been considered by the Delegated Officer as shown in Appendix 2.

**STEPHEN CHECKER
MANAGER WASTE INDUSTRIES
REGULATORY SERVICES**

An officer delegated by the CEO under section 20 of the EP Act

Appendix 1: Key documents

	Document title	In text ref	Availability
1.	Licence L5765/1994/11	L5765/1994/11	Accessed at www.dwer.wa.gov.au
2.	Category 10 Licence amendment application form signed by operations manager of MEPAU and attached supporting documentation	Licence amendment application	DWER record (DWERDT204469)
3.	DER, July 2015. <i>Guidance Statement: Regulatory principles</i> . Department of Environment Regulation, Perth.	DER 2015a	Accessed at www.dwer.wa.gov.au
4.	DER, October 2015. <i>Guidance Statement: Setting conditions</i> . Department of Environment Regulation, Perth.	DER 2015b	
5.	DER, May 2016. <i>Guidance Statement: Publication of Annual Audit Compliance Reports</i> . Department of Environment Regulation, Perth.	DER 2016a	
6.	DER, August 2016. <i>Guidance Statement: Licence duration</i> . Department of Environment Regulation, Perth.	DER 2016b	
7.	DER, September 2016. <i>Guidance Statement: Environmental Standards</i> . Department of Environment Regulation, Perth.	DER 2016c	
8.	DER, November 2016. <i>Guidance Statement: Environmental Siting</i> . Department of Environment Regulation, Perth.	DER 2016d	
9.	DER, February 2017. <i>Guidance Statement: Land Use Planning</i> . Department of Environment Regulation, Perth.	DER 2017a	
10.	DER, February 2017. <i>Guidance Statement: Risk Assessments</i> . Department of Environment Regulation, Perth.	DER 2017b	
11.	DWER, June 2019. <i>Guideline: Decision Making</i> . Department of Water and Environmental Regulation, Perth.	DWER 2019a	
12.	DWER, June 2019. <i>Guideline: Industry Regulation Guide to Licensing</i> . Department of Water and Environmental Regulation, Perth.	DWER 2019b	
13.	DWER, June 2019. <i>Guideline: Odour emissions</i> . Department of Water and Environmental Regulation, Perth.	DWER 2019c	

Appendix 2: Summary of applicants comments on draft conditions

Condition	Summary of Licence Holder comment	DWER response
Instrument Log table	Minor typographical changes	Typographical changes adopted
Table 3.7.1	Minor typographical changes	Typographical changes adopted