Decision Report

Application for Licence

Part V Division 3 of the *Environmental Protection Act 1986*

Licence Number	L9432/2024/1
Applicant	Strike South West Pty Ltd
ACN	118 251 497
File number	DER2023/000742
Premises	Walyering Processing Facility Brand Highway CATABY WA 6507 Legal description Part of Lot 3907 on Deposited Plan 209656 Part of Petroleum Production Licence L23 As defined by the premises map and coordinates in the issued licence
Date of report	07 October 2025
Decision	Licence granted

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1. Decision summary

This decision report documents the assessment of potential risks to the environment and public health from emissions and discharges during the operation of the premises. As a result of this assessment, licence L9432/2024/1 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this decision report, the Department of Water and Environmental Regulation (the department; DWER) has considered and given due regard to its regulatory framework and relevant policy documents which are available at https://dwer.wa.gov.au/regulatory-documents.

2.2 Application summary

On 17 November 2023, Strike South West Pty Ltd (the applicant) submitted an application for a licence to the department under section 57 of the *Environmental Protection Act 1986* (EP Act).

The application is to seek a licence relating to a gas extraction and processing facility on part of Production Licence L23, Brand Highway, Cataby (the premises, defined by the coordinates in the licence), for the supply of natural gas to the Parmelia Gas Pipeline located adjacent to the premises. The premises is approximately 21 km south-west of the town of Dandaragan and 5.5 km north-west of Cataby in the Shire of Dandaragan.

The facility is designed for oil or gas production from wells with an assessed production capacity of 250,0000 tonnes annum or 40 terajoules (TJ) per day under Schedule 1 of the Environmental Protection Regulations 1987 (EP Regulations) which are defined in licence L9432/2024/1. The infrastructure and equipment relating to the premises category and any associated activities which the department has considered in line with *Guideline: Risk Assessments* (DWER 2020) are outlined in licence L9432/2024/1.

2.3 Premises overview

The production facility will comprise a slug catcher, gas-gas heat exchanger, export gas filter, low temperature two phase separator, condensate flash vessel, condensate storage tanks, cold vent for emergency or maintenance blow down and condensate stabilisation, vent knock out drum, chemical injection skids (methanol and corrosion inhibitor), produced water treatment system and storage tanks, solar array and battery storage for power supply with a diesel generator back-up, storage shed/chemical store and a support utility containing switchgear and control system servers. The facility will be unmanned, being operated via a local Programmable Logic Controller remotely from an operations centre located in Perth.

Wet natural gas will be extracted from the two extraction wells and transferred via flowlines to the production facility. The gas will undergo two-phase separation into process gas and free fluids at a slug catcher. The separated process gas will be directed to a gas-gas heat exchanger where the temperature is reduced, the pressure of the pre-cooled gas is then reduced across the Joule-Thompson control valve, and the cooled gas is then transferred to a low temperature separator (LTS). The remaining liquids will be condensed and separated from the gas in the LTS and directed to the condensate flash vessel. Gas from the gas-gas exchanger is directed to an export gas coalescer filter for removal of any remaining impurities (liquids and dust) prior to discharge into the Walyering Gas Pipeline via a royalty flow meter. The Walyering Gas Pipeline will then transfer the sales gas to the Parmelia Gas Pipeline.

Free liquids will be directed from the slug catcher to a condensate flash vessel where they will undergo further separation into condensate, water, and vapour. Separated condensate will be

directed to the condensate storage tanks. Separated water will be directed to storage tanks. The lightest gaseous fraction will be discharged via a continuous purge to the cold vent.

Inputs to the process include corrosion inhibitor, and methanol to prevent hydrate formation during processing. The plant will be powered by a battery system charged by a solar array supported by a 50kVa diesel generator as a back-up power supply in event of insufficient solar generation or maintenance requirements.

The production facility includes cold venting of process gas to maintain the stability and safety of the system. Cold venting will result in discharge of methane, carbon dioxide (CO2), volatile organic compounds (VOCs), sulfur compounds and gas impurities to the atmosphere. The applicant advised cold venting will be limited to the following scenarios:

- discharge via the cold vent of a minor continuous volume from the condensate flash vessel to maintain positive backpressure and keep air out of the vent system;
- discharge via the cold vent of the production facility inventory when it is required to be shut-down due to maintenance or emergency; and
- discharge via any of the pressure safety valves of a small amount of process gas in event of a high pressure reading.

2.4 Part IV of the EP Act

The proposal to construct and operate the Walyering Conventional Gas Development was referred to the EPA under Part IV of the EP Act on 4 April 2022. The EPA examined the referral and conducted preliminary investigations and inquires including public consultation. On 6 July 2022 the EPA determined that the proposal would not be assessed under Part IV of the EP Act. In its determination, the EPA considered that the likely environmental effects of the project were not so significant as to warrant formal assessment due to it being within a previously disturbed area, there being no requirement for clearing of native vegetation, and Scope 1 and 2 GHG well below 100,000 CO2-e per annum (predicted to be ≤18,000 tonnes and ≤11,000 tonnes CO2-e respectively per annum).

The EPA concluded that the project can be adequately assessed and regulated through Part V of the EP Act, the Petroleum Pipelines Act 1969 (PP Act), Petroleum and Geothermal Energy Resources Act 1967 (PGER Act), Work Health and Safety Act 2022 (WHS Act), and the Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007. The application is considered to be generally consistent with the proposal referred to the EPA under Part IV of the EP Act other than the inclusion of a solar/battery array for power supply to the production facility in place of the referred proposal which indicated the facility would be connected to the grid. The premises Scope 2 GHG emissions are likely to be reduced from those considered by the EPA as a result of this change.

The Walyering Conventional Gas Development proposed to increase gas production from 30 TJ to 40 TJ. The EPA originally identified potential significant factors were social surroundings (noise, dust and vibration) and Greenhouse Gas Emissions. In this proposal as there is no change other than production rate, the Social Surroundings factor is unlikely to change. With expected Greenhouse Gas Emissions for scope 1 and scope 2 GHG emissions up to 29,000 tCO_2e/year combined for the premises before this proposed change the delegated officer considers it unlikely that a 25% increase in gas production would exceed the threshold level, and so, is not likely to change the significance of this factor.

2.5 Exclusions

The following matters are out of the scope of this assessment and have not been considered within the technical risk assessment detailed in this report:

- disposal of wastes - including municipal waste and produced water at locations outside

the premises boundary;

- power supply – power will be provided by a battery system primarily charged by a solar array, with a small (50 kVA) diesel generator for continued power supply during solar power down time (due to inspection and maintenance of the solar battery system or extended periods of limited sunlight). Solar power generation is not a prescribed activity and the diesel generator is sufficiently small (similar fuel consumption to a large 4-wheel drive vehicle) that emissions are not so significant as to warrant regulatory control, and it is well below the design capacity threshold of relevant prescribed premises categories;
- fire response infrastructure including tanks and pumps.

The licence is related to category 10 activities only and does not offer the defence to offence provisions in the EP Act (see s.74, 74A and 74B) relating to emissions or environmental impacts arising from non-prescribed activities, including those listed above

2.6 Other approvals

2.6.1 Rights in Water and Irrigation Act 1901 (RIWI Act)

Strike Energy has a 5C extraction licence GWL206081 for an existing extraction bore located on the Walyering 5 extraction well drill pad. Water for hydrotesting of the infrastructure will be sourced from this bore. The applicant advised that the extraction licence will be updated as needed to incorporate this activity.

2.6.2 Department of Mining, Petroleum and Energy (DMPE)

In Western Australia, all onshore petroleum exploration and development activities are subject to approval by DMPE. Gas gathering (extraction wells), and gas transfer and export activities (pipelines) are subject to approval requirements under the following legislation administered by DEMIRS:

- *Petroleum and Geothermal Energy Resources Act 1967* (PGER Act);
- Petroleum and Geothermal Energy Resources (Environment) Regulations 2012 (PGER Regulations);
- *Petroleum Pipelines Act 1969* (Pipelines Act); and
- Petroleum Pipelines (Environment) Regulations 1969 (Pipeline Regulations).

In accordance with this legislation, oil and gas operators must obtain Petroleum Pipeline and Petroleum Production licences and submit an Environment Plan (EP) to DMPE for approval. An EP is a management document designed to demonstrate that all environmental risks and impacts associated with a petroleum activity are reduced to As Low As Reasonably Practicable (ALARP), and at all times carried out in a manner consistent with the principles of ecologically sustainable development.

The premises is required to be operated in accordance with DMPE approved Environmental Plan (EP) and Safety Case, The Walyering Conventional Gas Development Construction,

Commissioning and Operations Environment Plan (EP) was most recently approved by DMPE on 30 July 2024. The Walyering Construction, Commissioning and Operations Safety Case was most recently approved by DMPE on 22 August 2024.

3. Compliance

The applicant was granted works approval W6727/2022/1 for the installation and time limited operations of the chrome plating infrastructure on the premises. The works approval holder submitted an Environmental Compliance Report (ECR) following completion of construction of

the infrastructure on 22 September 2024. A review of the compliance documentation submitted found that the infrastructure had generally been built in accordance with the works approval requirements. Minor variations in construction have occurred but the delegated officer does not consider them to alter risk, these include

- Removal of drain valves from concrete bunds to ensure they cannot be left open between site inspections.
- Metal bund installed in place of concrete bund for Methanol and corrosion inhibitor storage.
- Produced water storage tanks reduced from 2x 70m^3 tanks to 2x 20m^3 tanks, the applicant has stated an evaporation pond will be incorporated into the design and amendments made to the works approval prior to expiry.
- Condensate storage tanks have a reduced working capacity of 100m3, where 110m3 was proposed in the works approval. No requirement for the specific capacity specified and tanks are fit with high and high high-level alarms which activate shut off.

The applicant also has submitted the Environmental Commissioning Report on the 5 October 2024. In reviewing the commissioning documentation all activities were undertaken in compliance with the granted works approval. Monitoring was completed in line with works approval requirements including the following;

- No emissions of process gas (including VOCs and BTEX) from any point other than the cold vent
- The Walyering Processing Facility was continuously monitored via the PLC at the production facility during commissioning
- A flow indicator continuously measured the mass flow rate of gas vented from the condensate flash vessel outlet during commissioning. The flow indicator readings were provided to the department in support of the Environmental Commissioning Report
- The mass flow rate of the gas vented to the cold vent as part of pressurising and depressurising the slug catcher, low temperature separator and Walyering Gas Pipeline during environmental commissioning
- The weather monitoring station was operated with a telecommunication system which permitted continuous monitoring by the Perth Operations Centre during commissioning. Continuous monitoring of wind speed and direction were undertaken.

4. Air Emissions

Cold venting of process gas will occur primarily via the cold vent stack with minor amounts also vented from pressure safety valves during operation of the Walyering Production Facility (refer to section 2.3 for further details). The applicant provided details of the expected composition of emissions based on compositional analysis of flashed gas from the Walyering 5 well, as well as details of the cold vent design criteria, expected venting rates and timeframes for emergency shut-down (blowdown) and operational scenarios. The compositional analysis indicated that the gas is primarily comprised of methane, ethane and propane with a minor amount of VOCs (predominantly comprising benzene, toluene, ethylbenzene and xylenes (BTEX)). Based on the compositional analysis provided mercury is not expected to be present within the gas.

The applicant provided the department with an air quality assessment to inform the risk assessment of air quality impacts. The assessment reports on potential ambient air quality impact at nearby sensitive receptors with the main pollutants of concern being n-pentane, n-hexane, cyclohexane and VOCs (predominantly benzene, toluene, ethylbenzene, 124-Methylbenzene and xylens (BTEX)).

In reviewing the initial assessment it was identified that in line with the department's draft *Guideline: Air emissions* it is required that principal toxic substances are modelled for a 1-hour averaging period, these results are to be reported as the 99.9th percentile (9th highest value) and the air guideline values (AGVs) are to be met everywhere within the modelling domain, excluding within the premises boundary. The initial air quality assessment only provided the maximum 100th percentile value and these values in some circumstances exceed relevant AGVs therefore it was not possible to confirm whether the criteria of meeting AGVs everywhere within the modelling domain was met.

The applicant submitted a revised air quality assessment and modelling report which added these required results for principal and individual toxic pollutants, the results of which are displayed in Table 1 below. The most impacted receptor, Billinue Aboriginal Community, with highest predicted GLCs included in the table. Information on the location of the closest sensitive receptors is included in section 6.1.2.

Table 1: Modelled principal and individual toxic pollutant ground level concentrations at the nearest receptors

Emission	Averaging period	AGV[1] at 25°C	Predicted GLC µg/m^3		Percentage of AGV %	
			R5	Premises Boundary	R5	Premises Boundary
n-Pentane	1-hour	33,000 µg/m^3	32	71.913	<1	<1
n-Hexane	1-hour	3,200 µg/m^3	29.172	64.726	<1	2
Benzene	1-hour	29 µg/m^3	7.122	15.807	25	55
	Annual	10 µg/m^3	0.028	-	<1	-
Cyclohexane	1-hour	190 µg/m^3	20.122	44.652	11	24
Toluene	24 hours	3,770 µg/m^3	0.478	-	<1	-
	Annual	377 µg/m^3	0.035	-	<1	-
Ethylbenzene	1-hour	8,000 µg/m^3	0.582	1.292	<1	<1
	Annual	270 µg/m^3	0.002	-	<1	-
Xylen	24 hours	1,080 µg/m^3	0.143	-	<1	-
	Annual	870 µg/m^3	0.011	-	<1	-
Trimethyl-benzene	1-hour	2,200 µg/m^3	0.134	0.297	<1	<1

NOTE 1: AGV are taken from the *National Environment Protection (Ambient Air Quality) Measure (NEPM) (NEPC, 2024*)

DWER reviewed the revised air quality modelling and found that the modelling assessment

meets the requirements of DWER's *Air Quality Modelling Guidance Notes.* However, identified some limitations in the modelling approach, particularly regarding the omission of upset scenarios, which could potentially impact the assessment outcomes. In the absence of specific modelling of blowdown events the delegated officer saw it appropriate to rely upon the screening assessment information which informed the premises works approval W6727/2022/1, which will result in blowdown events being conditioned the same as the issued works approval to ensure the risk of air quality impacts at receptors remains acceptable (limitations on blowdown events based on wind direction with associated weather monitoring).

Based on the current modelling assumptions and operating scenarios modelled, the maximum predicted GLCs for all pollutants modelled are below 25% of air quality guidelines at all sensitive receptors, noting that while localised exceedances are predicted, they do not occur at the locations of sensitive receptors. The most impacted recepter of R5 was found to met the GLC criteria as identified below:

- The predicted concentration of all identified pollutants was less than 1% of the criteria for all averaging periods, except for benzene and cyclohexane.
- The maximum predicted 1-hour concentration of cyclohexane was 11% of the criterion.
- The maximum predicted 1-hour concentration of benzene was 25% of the criterion.

The absence of a cumulative emissions scenario is a limitation, but the expected low background concentrations of VOCs suggest a low cumulative impact.

5. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk Assessments* (DWER 2020).

To establish a risk event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

5.1 Source-pathways and receptors

5.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises operation which have been considered in this decision report are detailed in Table 2 below. Table 2 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

Table 2: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Operation			
Noise	Operation of the Walyering production facility	Air / windborne pathway	• Processing equipment has negligible noise emissions, with the exception of the JT valve on the low temperature separator, diesel generator, and condensate transfer pumps. • Condensate transfer pumps located >20 m from the closest fenceline, are designed for quiet operation and will typically be operated for 90 minutes per day during daylight hours.

Emission	Sources	Potential pathways	Proposed controls
Volatile organic compounds (BTEX),	Operation of the Walyering production facility	Air / windborne pathway	• The processing facility has minimised down time for maintenance/start-up/shut-down through incorporation of simple equipment and no rotating parts. • A programmable logic controller (PLC) is installed on the premises for operation and monitoring of the production facility. • The PLC is programmed to respond to command and emergency shut-down signals locally from the plant as well from an operations centre located in Perth. • A local emergency shut-down button is installed to provide shut-down capability separate from the PLC. • Emergency shut-down will be initiated in the event of process upsets based on pre-defined limits for pressure, flow-level and temperature. • Pressure vessels (i.e. the low temperature separator) are fitted with a Pressure Safety Valve (PSV) to protect against overpressure (explosion risk). Small amounts of process gas will be discharged/cold vented from the PSV in event of high-pressure readings. • To prevent air ingress into the system (which presents an explosion risk) a continuous low volume purge will be discharged via a cold vent stack as per the minimum purge gas flow requirement described in American Petroleum Institute (API) Standard 521 Pressure-Relieving and Depressurizing Systems. The cold vent stack will be approximately 5 m in height and 20 cm diameter. • The plant will have shut down valves to enable the inventory to be held until it is blown down during an emergency shut-down or for maintenance, or the facility is re-started. The maximum blown down emissions will equate to the facility capacity of 9.265 m3. • Blowdown is not automatic and must be initiated manually, therefore will be a planned event. • The plant includes multiple shut down valves and performance criteria to minimise the inventory needing to be blown down during emergency shut-downs. • Only major maintenance activities (as opposed to routine maintenance) and emergency shut-down will require a full inventory blow down which is only expected to occur once per year for a predicted duration of 15 minutes. • Inventory blow-down will be discharged via the cold vent stack.
Hazardous substances including	Operation of the Walyering production	Direct discharge	• The premises has a Dangerous Goods Site Storage Licence under the Dangerous Goods Act 2004 and the Dangerous Goods Safety (Storage and Handling of Non-explosives)

Emission	Sources	Potential pathways	Proposed controls
process chemicals (methanol and corrosion inhibitor) and condensate	facility		Regulations 2007 and storage of dangerous goods will be in accordance with the licence. • Process chemical skids are bunded in accordance with AS 1940-2004 The storage and handling of flammable and combustible liquids (AS1940-2004). • Chemical skids at the Walyering 5 extraction well are contained within a bund. • Condensate storage tanks are self-bunded and located within a HDPE and concrete lined earthen bund that meets the requirements of AS 1940-2004 and the premises Dangerous Goods Storage Licence. • Condensate storage tanks are fitted with high and high-high level sensors to trigger automatic shut-off valves to prevent overfilling. • The condensate tanker transfer point has an automatic cut-off valve.
Potentially contaminated stormwater water (hydrocarbons)	Operation of the Walyering production facility	Direct discharge	• Liquid vessels within the Walyering Processing Facility are located within concrete bund areas and the condensate storage tanks will be bunded as described above. • Stormwater accumulated within concrete bunds will be disposed in accordance with Strike's Stormwater Management Procedure during routine facility inspections. • This will involve visual inspection for signs of contamination (i.e. sheen/colouring) and discharge to grade in the event there is no evidence of contamination.
Produced water (contains hydrocarbons)	Operation of the Walyering production facility	Direct discharge	• Separated produced water are stored in two 20 m^3 enclosed tanks prior to being removed for offsite disposal via a suitably licensed waste contractor. • The treated water tanks are self-bunded or located within an appropriately sized bund. • The water tanker transfer point will have dry break couplings.

5.1.2 Receptors

In accordance with the *Guideline: Risk Assessment* (DWER 2020), the Delegated Officer has excluded the applicant's employees, visitors, and contractors from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

Table 3 and

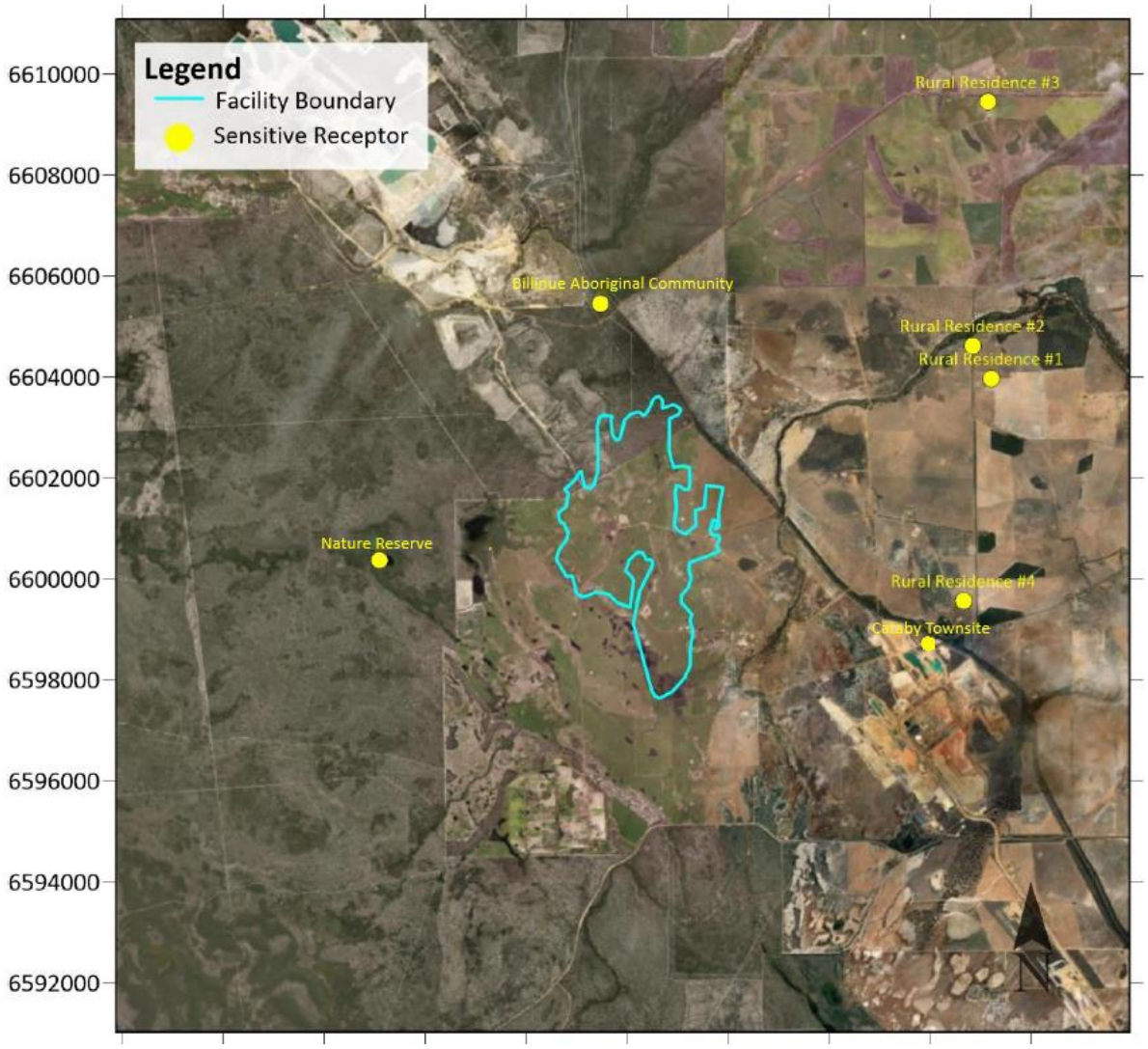

Figure 1 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises *(Guideline: Environmental Siting* (DWER 2020)).

Table 3: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	**Distance from activity / prescribed premises**
Rural residence (R4)	~3.6 km south-east
Rural residence (R1)	~4.6 km east
Rural residence (R4)	~4.1 km south south-east
Rural residence (R3)	~4.3 km north-east
Billinue Aboriginal Community (R5)	~4.2 km north
Cataby townsite	~3.3 km south-east
Environmental receptors	**Distance from activity / prescribed premises**
TECs – Banksia dominated woodlands of the Swan Coastal Plain	~1 km northwest
Conservation significant fauna	A number of conservation significant birds may be present within the surrounding area
Nature Reserve	~3.2 km west
Surface water - Minyulo Brook, a minor non-perennial watercourse. Regionally significant as it supports a high proportion of water dependent flora and flushes the associated wetland	~1.7 km west and 2.8 km east
Surface water - Caro Swamp, catchment for several minor non-perennial water sources in the area, including the Caro Brook, Enminga Brook and Minyulo Brook, Likely to be seasonally iundated.	~2 km south
Groundwater – Gingin groundwater area	Located within the designated Gingin groundwater area. Groundwater is understood to be relatively shallow, with a depth of 5- 10 mbgl, and the groundwater quality in the broader regional area is understood to be marginal, with a salinity of 500 to 1000 mg/L.
Registered Aboriginal heritage sites	300 southwest (Minyulo Brook heritage site)

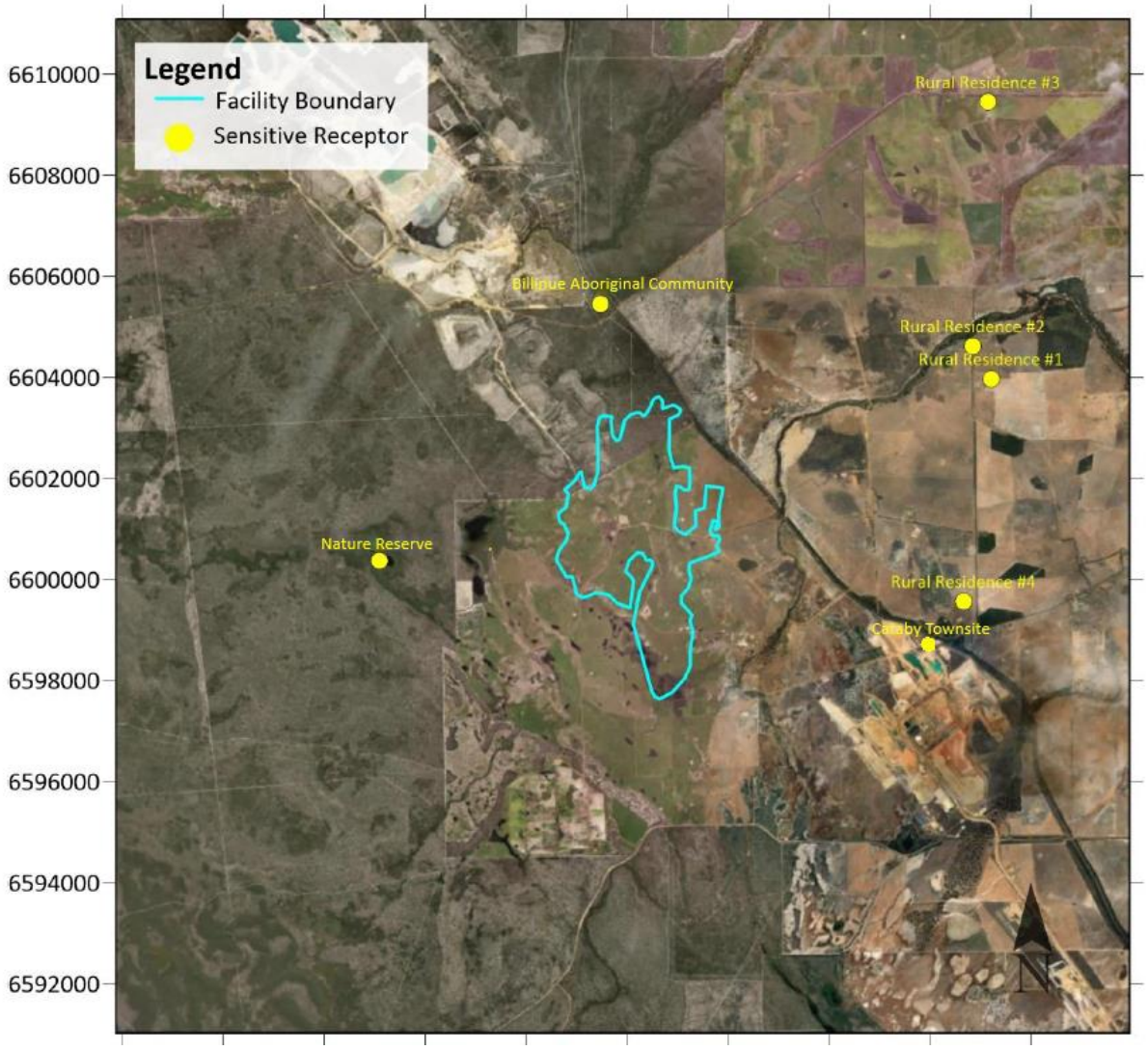

Figure 1: Distance to sensitive receptors

5.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and takes into account potential source-pathway and receptor linkages as identified in Section 5.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the applicant has proposed mitigation measures/controls (as detailed in Section 5.1), these have been considered when determining the final risk rating. Where the delegated officer considers the applicant's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence as regulatory controls.

Additional regulatory controls may be imposed where the applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 4.

Licence L9432/2024/1 that accompanies this decision report authorises emissions associated with the operation of the premises i.e. gas production.

The conditions in the issued licence, as outlined in Table 4 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Table 4: Risk assessment of potential emissions and discharges from the premises during operation

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions [2] of licence	Reasoning
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
Operation								
Operation of the Walyering production facility	Methane, carbon dioxide, volatile organic compounds, sulphur compounds and gas impurities (continuous cold venting of gas)	Air/windborne pathway causing impacts to health and amenity	Rural residences 3.6 km south east, 4.6 km east and 4.2 km north	Refer to Table 2	**C = Minor,** Specific Consequence Criteria (for public health) are likely to be met **L = Unlikely,** will probably not occur in most circumstances **Medium Risk**	Y	Conditions 1, 2 ,4 and 5	All associated infrastructure was installed with the relevant controls as per the approved works approval (W6727/2022/1), there has been no change to the assessed risk and operational conditions have been specified in line with those in the works approval.
	Methane, carbon dioxide, volatile organic compounds, sulphur compounds and gas impurities (inventory blowdown)				**C = Major,** Specific Consequence Criteria (for public health) are exceeded **L = Rare,** may only occur in exceptional circumstances **Medium Risk**	Y	Conditions 1, 2 ,4 and 5	All associated infrastructure was installed with the relevant controls as per the approved works approval (W6727/2022/1), there has been no change to the assessed risk and operational conditions have been specified in line with those in the works approval.
	Noise	Air/windborne pathway causing impacts to amenity	Rural residences 3.6 km south east, 4.6 km east and 4.2 km north	Refer to Table 2	**C= Slight,** minimal impact to amenity at a local scale **L= Unlikely,** will probably not occur in most circumstances **Low Risk**	NA	NA	Given the distance to the nearest public receptors the delegated officer considers that the noise associated with the operation of the premises is unlikely to be distinguishable at the nearest receptors, therefore presents a low risk of impacting public amenity.
	Produced water (contains hydrocarbons) due to loss of containment	Direct discharge to land from containment infrastructure potentially resulting in land contamination and potential seepage to groundwater causing contamination	Immediate surrounding area (farmland) Groundwater (5-10 mbgl)	Refer to Table 2	**C = Minor,** Low level onsite impact, minimal local offsite impacts **L = Unlikely**, will probably not occur in most circumstances **Medium Risk**	N	**Condition 1**	The produced water storage tanks were reduced in size when compared to what was approved in the works approval (W6727/2022/1) due to lower levels of produced water during the gas processing activities. During normal operations it is expected that ~10,000L of produced water will be created each day. The storage tanks are capable of holding multiple days of water and will be tankered offsite for disposal. A high and high-high level alarm has also been installed on the produced water system. The delegated officer found it appropriate to condition additional operational controls on the produced water storage tanks including: • The containment bund must be maintained: ○ in a fit for purpose condition for containing liquids and free of cracks or damage; ○ with capacity to contain not less than 110% of the volume of one condensate storage tank; and with drain valves locked unless they are in use. • Produced water storage tanks must be operated with high and high-high level sensors. These will ensure that risk is minimised to an acceptable level during the operation of the gas processing facility.
	Condensate due to loss of containment	Direct discharge to land resulting in land	Immediate surrounding area (farmland)	Refer to Table 2	**C = Moderate** mid level onsite impacts and low level offsite impacts at a local scale	Y	Condition 1	All associated infrastructure was installed with the relevant controls as per the approved works approval (W6727/2022/1), there has been no change to the assessed risk and operational conditions

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions [2] of licence	Reasoning
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
		contamination and potential groundwater contamination	Groundwater (5-10 mbgl)		**L = Rare,** may only occur in exceptional circumstances **Medium Risk**			have been specified in line with those in the works approval.
	Contaminated stormwater or hazardous materials such as hydrocarbons or chemicals (corrosion inhibitor, methanol)	Direct discharge to land resulting in land contamination and potential ground contamination	Immediate surrounding area (farmland) Groundwater (5-10 mbgl)	Refer to Table 2	**C = Minor,** Low level onsite impact, minimal local offsite impacts **L = Unlikely**, will probably not occur in most circumstances **Medium Risk**	Y	Condition 1	All associated infrastructure was installed with the relevant controls as per the approved works approval (W6727/2022/1), there has been no change to the assessed risk and operational conditions have been specified in line with those in the works approval.

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk Assessments* (DWER 2020).

Note 2: Proposed applicant controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

6. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

Table 5: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 10 April 2024	The department received a submission from one party in response to the advertisements. The matters raised included: 1. In the event of an unplanned pollution event the environmental controls are inadequate 2. Putrescible waste storage mechanisms are inadequate to prevent feral animal attraction 3. Bunded liquid waste areas present a risk to wildlife	1. The nearest surface water receptor is approximately 1.7 km from the premises and is not expected to be impacted by the premises activities given this separation distance. The delegated officer also considers licence conditions applied relating to containment of produced water and hydrocarbons adequately mitigate the risk of impacts from such discharges. 2. The application indicates putrescible waste receptacles on the premises will be covered. Minimal volumes will be produced (<2m^3 a year predicted). To avoid regulatory duplication the approved DMPE Environmental Plan outlines controls to prevent feral animal attraction and are not replicated in this licence. 3. To avoid regulatory duplication aspects that are already regulated by other government bodies were not considered in this licence application The approved DMPE Environmental plan outlines the presence of fencing, ramps and egress matting to mitigate risk of liquid waste areas to fauna.
Local Government Authority advised of proposal on 11 April 2024	None received	NA
Department of Energy, Mines, Industry Regulation and Safety (DEMIRS) advised of proposal 11 April 2024	None received	NA
Applicant was provided with draft documents on 4	The applicant responded on the 29 September 2025 and waived the	The delegated officer notes this information.

September 2025	comment period with no requested changes	

7. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that a licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia
2. Department of Water (DOW) 2013, *Water Quality Protection Note 26 - Liners for containing pollutants, using synthetic membranes* , Perth, Western Australia
3. Department of Water and Environmental Regulation (DWER) 2019a, *Guideline: Industry Regulation Guide to Licensing*, Perth, Western Australia
4. DWER 2019b, *Guideline: Air emissions (DRAFT)*, Perth, Western Australia
5. DWER 2020a, *Guideline: Environmental Siting*, Perth, Western Australia
6. DWER 2020b, *Guideline: Risk Assessments*, Perth, Western Australia
7. Environmental Protection Authority (EPA) 2022, *Public record pursuant to s. 39 of the Environmental Protection Act 1986 for The Walyering Conventional Gas Development*, Perth, Western Australia
8. Strike South West Pty Ltd (Strike Energy) 2023, *Application for a licence under the Environmental Protection Act 1986 dated ,11 November 2023*, Perth, Western Australia
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