Thevenard Island Care and Maintenance

Environment Plan Summary

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1.0 Introduction

Chevron Australia Pty Ltd (Chevron) is the proponent and nominated operator of the Thevenard Island (Thevenard Island) Joint Venture within the Petroleum Titles containing the Saladin, Cowle, Yammaderry, Crest, Roller and Skate oilfield infrastructure (Figure 1 1).

The Thevenard Island facilities are no longer operational and have been cleaned, flushed and depressurised following the cessation of production activities in 2014. The facilities are now under a care and maintenance regime until decommissioning and rehabilitation of the site commences. Since the cessation of production activities in 2014, care and maintenance activities have been undertaken by personnel on-site. In November 2015, all personnel were demobilised from Thevenard Island, and all ongoing care and maintenance activities will be undertaken on a periodic basis, with personnel mobilised from the Western Australia (WA) mainland (and on occasion, Barrow Island).

1.1 Scope

The scope of the Plan includes the care and maintenance of Thevenard Island Joint Venture idle infrastructure, comprising of quarterly campaigned inspection, monitoring and maintenance visits to Thevenard Island. There are no longer any accommodation facilities or utilities operational on Thevenard Island; therefore, the scope of this EP is limited to the periodic visits to Thevenard Island to undertake inspection, maintenance and monitoring activities located within the Petroleum Titles outlined in Section 1.2.

Separate Environment Plan/s addressing the management of potential environmental impacts and risks will be submitted to DMIRS for assessment and approval prior to the commencement of activities related to decommissioning.

1.2 Location

Thevenard Island is approximately 25 km north-west of Onslow and 70 km south-west of Barrow Island (BWI) in the Carnarvon Basin, WA. Thevenard Island is approximately 5 km in length, 1 km at its greatest width and covers an area of approximately 550 ha.

Table 1-1: Thevenard Island Location

Location Point (GDA94)	Latitude			Longitude		
	Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
Thevenard Island	21	27	33.00	115	0	34.00

The Thevenard Island idle assets are located on Thevenard Island within petroleum Production Licences L12 and L13 and in surrounding waters within petroleum Production Licences TL/4 and TL/7 and Retention Lease TR/4 (Figure 1-1). Pipeline Licences TPL/6 and TPL/11 tie the shut in offshore wells back to the idle, cleaned and depressurised Thevenard Island processing facilities. The idle assets also include mainland facilities; the onshore Roller/Skate gas export pipeline and the Tubridgi Metering Station is within petroleum Pipeline Licence PL 21 which is located on Urala pastoral land, approximately 20 km south of Onslow.

1.3 Timeframes

Care and maintenance of Thevenard Island infrastructure will continue to occur until such time that decommissioning of the infrastructure has occurred. Therefore, care and maintenance activities will progressively reduce as infrastructure is decommissioned.

1.4 Nominated Operator Contact Details

Chevron Australia Pty Ltd (Chevron) is the proponent and the nominated operator for the Thevenard Island Joint Venture., which includes the following participants:

- Chevron Australia Pty Ltd
- Chevron (TAPL) Pty Ltd
- Santos Offshore Pty Ltd
- Mobil Australia Resources Company Pty Ltd.

Further information regarding Thevenard Island care and maintenance activities can be obtained by contacting the Policy, Government and Public Affairs (PGPA) Operations Manager, contact details are listed in Table 1-2.

Table 1-2: Nominated Operator Contact Details

Company Name	Chevron Australia Pty Ltd
Contact Person	Graeme Harman
Business Address	GPO Box S1580, Perth WA 6845
Telephone Number	08 9216 4000
Email Address	ask@chevron.com

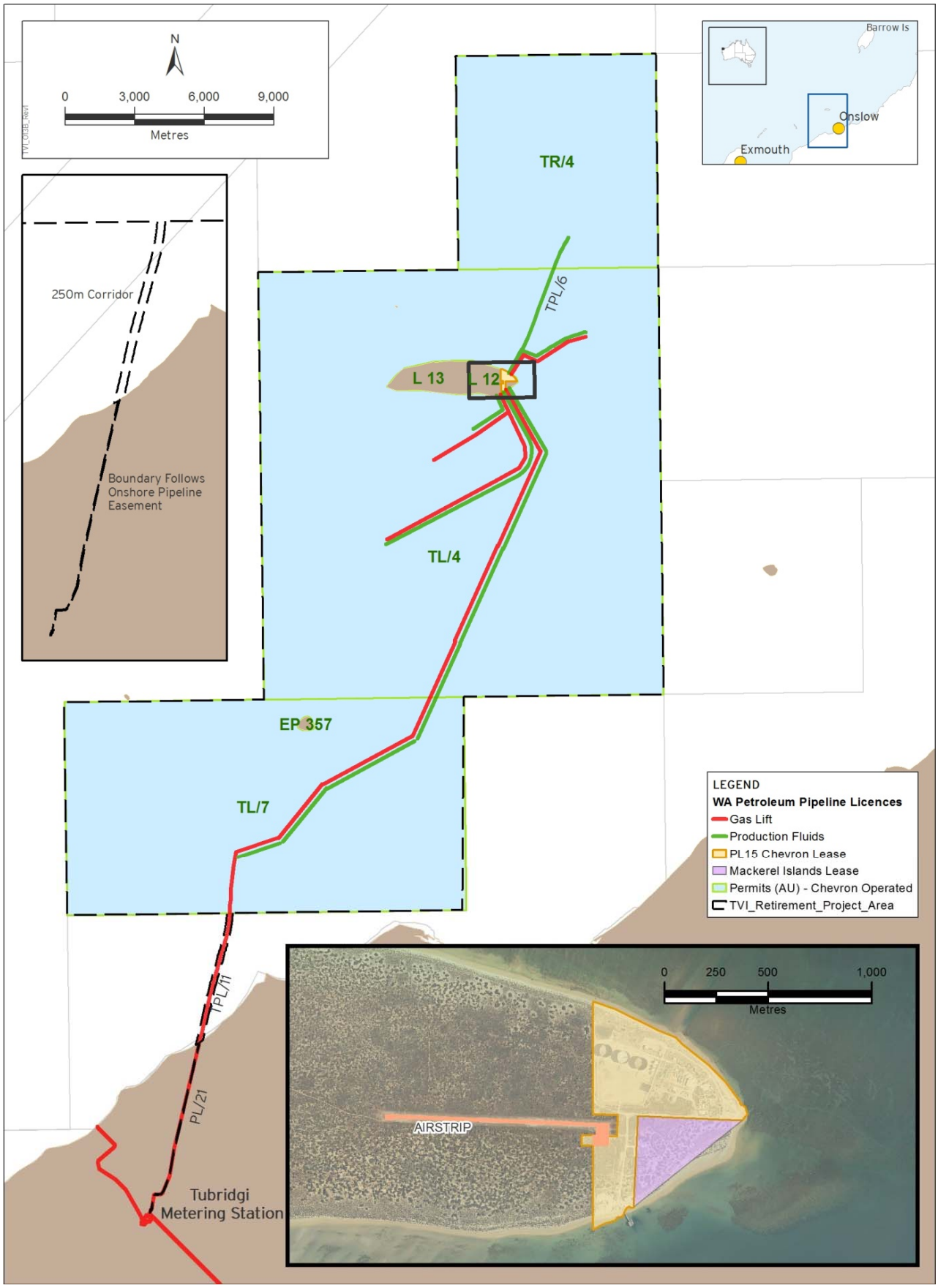

Figure 1-1: Thevenard Island Petroleum Permit Areas

2.0 Description of the Petroleum Activity

The care and maintenance activities detailed in this EP Summary relate to the now idle infrastructure previously used to support production on Thevenard Island prior to field closure in 2014. This idle infrastructure includes:

- Onshore production facilities and associated infrastructure
- Onshore accommodation and associated utilities
- 3 tripods (Saladin A, B, C) – offshore platforms
- 6 monopods (Cowle, Skate, Yammaderry, Roller A, B, C) – offshore platforms
- Subsea pipelines (conditioned during the cessation of production so that they contain water with ≤30 ppm of hydrocarbon in water content)
- Tanker loading facilities
- Onshore development wells (shut-in and isolated from pipelines)
- Offshore development wells (shut-in and isolated from pipelines)
- 1 suspended offshore exploration well (Australind 1) (Table 2 2)
- Tubridgi metering station (onshore mainland).

All production pipelines and vessels have been cleaned and flushed and all production plant and Metering Station facilities are isolated, depressurized and free of residual hydrocarbon. The diesel network has been cleaned and flushed to an oil in water concentration of ≤50 ppm. All wells are isolated at the wellhead.

The facilities (including the Tubridgi Metering Station on the mainland) have been secured, which includes measures such as exclusion fencing, sumps have been cleaned and sealed and/or filled, where possible, and fauna egress measures and gratings are in place, where required.

2.1.1 Well Maintenance and Monitoring

Onshore and offshore well maintenance and monitoring will be conducted periodically and may include condition monitoring, wellhead and Christmas tree maintenance and subsurface safety valve (SSSV) testing.

These activities include:

- Gas testing
- Thorough visual inspections of wellheads and trees
- Checking and recording of pressures in annuli, void areas and tree cavities
- Functioning / cycling of valves
- Pressure and inflow testing of valves, void areas and seals
- Greasing of valve bodies and stem bearings

In accordance with Regulation 15(9) of the State Petroleum (Environment) Regulations, details of any chemicals to be introduced into a well associated with well maintenance and monitoring activities will be disclosed to the DMIRS prior to use.

2.1.2 Facility Inspections and Maintenance

Maintenance and inspections on offshore infrastructure may include offshore platform maintenance, such as navigation lights, solar power system, winches and cranes, safety critical equipment, cathodic protection systems, and a structural integrity maintenance program.

Offshore inspections and maintenance may include the use of remotely operated vehicles (ROV), autonomous underwater vehicles (UAV) or divers deployed from a vessel, and marine acoustic surveys (use of multibeam echosounder and/or side-scan sonar from a vessel). Inspections and maintenance may be routine, or be triggered by specific events (such as cyclones or seismic events) that have the potential to affect infrastructure.

Maintenance and inspections occurring onshore will include inspection hydrocarbon storage areas, testing and maintenance of cathodic protection systems, NORM storage area, erosion prone areas, and environmental inspections to ensure controls are in place and functioning.

An annual inspection of the Tubridgi Metering Station is planned to check equipment status is unchanged and security fencing and signage is functioning. This involves a day trip for visual inspection of the facility, the pipeline (along a designated road) and the beach valve enclosure.

2.1.3 Environmental Monitoring

The scheduled campaign visits to Thevenard Island will include environmental monitoring activities. Environmental monitoring has occurred throughout operations on Thevenard Island and is conducted to identify potential impacts on the environment resulting from ongoing care and maintenance activities. Environmental monitoring programs include:

- Groundwater monitoring
- Weed management
- Terrestrial ecological monitoring
- Rehabilitation trials

2.1.4 Logistics

2.1.4.1 Personnel and Transport

Transfer of personnel and equipment required to complete the campaign activities will occur via vessel transit from the WA mainland and on occasion, Barrow Island. Fixed wing aircraft transfers may also occur occasionally. The vessels used during care and maintenance activities will be approximately 15 m in length, Class 2C vessels.

Transportation on Thevenard Island will be via utility vehicles and/or Polaris buggy. Fuel required for mobile equipment and vehicles in order to complete the planned work scopes will be transported to Thevenard Island during the campaign.

2.1.4.2 Waste Management

As there is no permanent accommodation facility or utilities operating on Thevenard Island, the waste generated is limited to the campaign visits to the island. Wastes generated during campaign visits to Thevenard Island will be appropriately contained and removed from Thevenard Island at the end of each day/campaign and returned to the mainland for disposal.

The oily wastes currently stored on Thevenard Island will be shipped to the mainland for disposal at an approved licenced disposal facility when there is barge space available on barges departing Thevenard Island. Chevron will remove oily wastes in a staggered process whereby all remaining oily waste within ISO tanks is demobilised off island for onshore disposal.

3.0 Description of the Environment

Thevenard Island is a Nature Conservation Reserve (Reserve No. 33174) vested in the Conservation Commission of WA, primarily for the protection of seabird and shorebird populations utilising coastal habitats. Thevenard Island is also part of the Islands Exmouth Gulf and Rowley Shelf listed on the Register of the National Estate (No. 5/08/190/004) for the conservation value of their seabed, turtle nesting sites, and populations of small mammals on some islands.

3.1 Physical Environment

Thevenard Island is a low, relatively flat, vegetated mid shelf cay approximately 5 km long by 1 km wide. Thevenard Island covers an area of approximately 550 ha with an average height above sea level of 5 m Australian Height Datum (AHD). The surrounding shallow sea constitutes the continental shelf and comprises up to 250 m of lime cemented sand, grit, conglomeratic and coral reef deposits of Quaternary age, overlying Tertiary limestones of the Cape Range Group (LeProvost et al., 1987). No natural drainage patterns exist on TVI and rainfall infiltrates the sandy soils and directly recharges the shallow unconfined superficial groundwater. The unconfined groundwater aquifer is present within the Aeolian sands between 1 and 7 m (Golder 2011).

Water depths near the Thevenard Island marine facilities and offshore areas range from ~1 m to ~17 m (Fugro 2013). Around Thevenard Island, which forms part of the Rowley Shelf, sediments are mainly composed of sand particles, with the largest particles either medium or coarse sand (Oceanica 2013).

The benthic marine environment within the Thevenard Island area is broadly characterised by five intertidal and subtidal habitats (sandy beaches, intertidal limestone pavement, subtidal limestone pavement, coral communities, subtidal sand).

3.2 Biological Environment

The vegetation on Thevenard Island consists of four vegetation sub-formations that largely correspond to prevalent small-scale geomorphic units: the inland ridge system, fringing coastal foredunes, coastal plain towards the western end of Thevenard Island and disturbed or semi-disturbed ground (Astron Environmental, 2006).

According to the DPaW Declared Rare and Priority Flora list for the Pilbara region, no Declared Rare Flora (DRF) species are known to occur on Thevenard Island; however, the Priority 2 flora specie, *Carpobrotus sp. Thevenard Island* occurs on the island.

To date, 102 plant taxa have been identified on the CALM Act Lease and the DBCA Nature Reserve. Since operations commenced, 11 environmental weed species and 20 mainland native species have been recorded as introduced to Thevenard Island (Astron Environmental 2013a). Results from weed management and monitoring programs conducted in 2014-2015 recorded 12 weed species on the CALM Act Lease (Astron Environmental 2015).

The house mouse (*Mus domesticus*) and the Thevenard Island mouse (*Leggadina lakedownensis*) are the only two terrestrial mammal species found on Thevenard Island. The Thevenard Island mouse was recorded in 1985 (LeProvost et al. 1987), and the house mouse is believed to have been anthropogenically introduced to Thevenard Island in approximately 1985 (Astron Environmental 2011).

A total of 76 bird species have been recorded during avifauna surveys on TVI between 1985 and 2013 (Astron Environmental, 2013). These bird species consist of resident and migratory bird species that utilise suitable habitats on Thevenard Island.

Five species of sea turtle occur in the waters of north-western WA, with Green Turtles (*Chelonia mydas*) particularly abundant in this region (Pendoley 1997). All five species

are listed as Threatened and Migratory under the WA Wildlife Conservation Act 1950 and the Environmental Protection and Biological Conservation Act 1999.

Migrating humpback whales may be encountered in the offshore area of Thevenard Island between September and November, however the offshore area does not contain recognised migratory routes, known feeding, breeding or resting areas. Whale sharks are known to pass through and potentially feed in the offshore area of Thevenard Island while migrating to aggregation areas on the Ningaloo Coast. Dugongs are also likely to be present in the nearshore waters around Thevenard as seagrass around the island has been suggested to be important Dugong habitat (Preen et al. 2007).

3.3 Cultural Heritage

Tubridgi forms part of the Thalanyji Native Title Consent Determination, which was granted on 18 September 2008 and is registered on the National Native Title Tribunal Register. Thevenard Island is not within the Thalanyji Native Title Consent Determination and there are no Aboriginal heritage places or registered sites within the CALM Act Lease on Thevenard Island. An Aboriginal archaeological survey of the Roller A to Tubridgi gas pipeline corridor on the mainland was conducted in 2014, and found one previously unidentified site within the survey corridor. There are no planned ground disturbing activities along the pipeline survey corridor during care and maintenance, and no sites were located in or surrounding the Tubridgi Metering Station.

3.4 Socio-Economic Environment

The Pilbara coastal region is one of WA's largest resource development and industrial areas. Important industries include petroleum, iron ore export, salt production and aquaculture. A major shipping port is located at Dampier to facilitate exports from this region, as well as a number of smaller ports in the region.

Major commercial fisheries, particularly prawn trawling, operate out of both Exmouth and Onslow. Exmouth also supports a growing tourism industry, primarily centred on the area's marine attractions. Recreational fishing charters regularly visit the waters around the offshore islands of the region during the winter tourist season.

4.0 Major Environmental Hazards and Controls

The risk assessment for the Thevenard Island care and maintenance activities was undertaken in accordance with the Chevron Australia Health, Environment, and Safety (HES) Risk Management Process. This approach is consistent with the processes outlined in ISO 31000:2009 Risk Management – Principles and Guidelines and Handbook 203:2012 Managing Environment-related Risk.

The risk assessment process and evaluation involved numerous consultations and a risk assessment workshop on 9 September 2015. Aspects associated with the care and maintenance activities have been subject to an impact and risk assessment to understand the potential environmental risks associated with the activity and identify relevant controls to reduce impacts and risks to as low as reasonably practicable (ALARP) and an acceptable level.

The environmental impact identification and risk assessment process comprised the following components:

- Identification of petroleum activities
- Identification of particular environmental values and sensitivities within the environment that may be affected
- Identification of relevant aspects with the potential to pose a hazard to identified particular environmental values and sensitivities
- Evaluation of the potential consequences to the identified values and sensitivities without controls
- Identification of control measures to reduce the potential likelihood of the consequence occurring
- Evaluation of the likelihood of the consequence occurring with planned and confirmed control measures in place
- Quantification of the risk ranking with controls in place
- Determination of whether the potential environmental impacts and risks are ALARP after considering the effectiveness of the identified controls
- Determination of whether the potential environmental impacts and risks are acceptable

Control measures (Environmental Performance Standards) were identified during the environmental risk workshop to ensure identified risks were reduced to ALARP and of an acceptable level. Control measures were considered in terms of both preventing the impact occurring, and mitigating the severity of the consequence, drawing on the hierarchy of controls, identified as Elimination, Substitution, Isolation, Engineering, and Administration and Procedures.

A summary of the major environmental hazards and controls in place to manage each environmental aspect is detailed in Table 4-1.

Table 4-1: Major Environmental Hazards and Controls

Source of Environmental Impact or Risk (Hazard)	Potential Environmental Impact or Risk (Consequence)	Control Measures
Ground and Seabed Disturbance		
Movement of mobile equipment, erosion control works	• Ground and vegetation disturbance	• Vehicle movements restricted to the CALM Act Lease, designated roads and tracks • All drivers are trained and certified • Conduct risk assessment for erosion control works as part of the Permit to Work system
Vessel anchoring and barge landing	• Seabed disturbance	• Anchoring and landing occurs within Chevron-approved areas (within 200 m of infrastructure) to avoid environmental sensitivities • Loading and unloading of equipment from vessels at Thevenard Island use the barge landing area or jetty only to avoid environmental sensitivities
Terrestrial and Marine Fauna Interaction		
Physical presence of infrastructure	• Terrestrial fauna injury / casualty	• Site inspection conducted during campaign includes fauna exclusion/egress controls are in place and operational
Movement of vessels, vehicles and mobile equipment	• Terrestrial and marine fauna injury / casualty • Nesting fauna disturbance / behavioural change	• All drivers are trained and certified • Vehicle movements restricted to the CALM Act Lease, designated roads and tracks • Speed restricted to 40 km / hr • Active nests will not be disturbed during care and maintenance activities
Clearing of Sand from Barge landing	• Marine fauna injury / casualty	• Barge landing hard stand area will be demarcated to prevent disturbance to adjacent beach during turtle nesting and hatching season (Nov – April) • All sand removed from the barge landing area will be stockpiled within the laydown area providing a 2 metre buffer away from the beach / laydown interface during turtle nesting and hatching season (Nov – April)

Waste		
Unplanned release of wastes during storage and transport	• Contamination of terrestrial or marine environment	• All waste is appropriately contained, removed from Thevenard Island at the end of each day/campaign as appropriate and returned to the mainland for disposal • Hazardous wastes will be containerised and stored in secondary containment prior to removal • Groundwater monitoring purge water is collected and decanted into isolated API separator • Vessel wastes are managed in accordance with MARPOL 73/78 (The International Convention for the Prevention of Pollution From Ships, 1973 as modified by the Protocol of 1978)
		• Wastes are disposed of at a licenced waste disposal facility, in accordance with Environmental Protection (Controlled Waste) Regulations 2004 • Thevenard Island NORM storage location is locked and sign-posted, in accordance with the Thevenard Island Radiation Management Plan (ABU130100161)
Ignition Source		
Presence of ignition sources causing fire	• Terrestrial flora, fauna and ecological community disturbance	• Mobile equipment and vehicles will be restricted to plant area, designated roads and tracks • Permit to work obtained prior to conducting any hot work • Vehicle fitted with fire extinguisher
Introduction and Spread of Non-Indigenous Species		
Movement of personnel and mobile equipment	• Terrestrial flora, fauna and ecological community disturbance	• Personnel and equipment quarantine checks undertaken prior to travelling to Thevenard Island, as per Quarantine Management Plan • Weed inspections and control field visits undertaken as per the Weed Management Plan • Vehicle movements are restricted to existing roads and tracks within the approved CALM Act Lease
Movement of vessels	• Benthic habitats, ecological communities and marine fauna	• All new vessels contracted to support Thevenard Island care and maintenance activities undergo a vessel inspection, confirming vessel has current and certified antifouling coating

Emergency Nightworks		
Presence of night lighting	• Disorientation and behavioural impacts to fauna	• No care and maintenance activities planned to occur at night • In the event emergency nightworks are required during turtle nesting or hatching season, lighting impacts shall be reduced as far as practicable by implementing mitigation measures such as: o Use only the minimal amount of light for the minimal amount of time required to safely executed the emergency activities, o Shielded, directed away from the beach and directed on the work area only, o Where possible, lower-frequency light sources (i.e. red or orange) shall be used, and blue/white lights avoided, o Weekly inspection undertaken from the beach to assess light levels in the event emergency nightworks is required to continue for a period of time.
Hydrocarbon and Chemical Spills		
Mechanical, structural failure or human error	• Contamination of soil • Localised reduction in water quality	• Spill trays will be incorporated in Hazard Analysis / Work Method Statements where a spill risk is identified • Equipment is maintained in accordance with maintenance schedule • Refuelling undertaken in accordance with Hazard Analysis, which includes the following safeguards: - Use of spill tray during refuelling - Monitoring of fuel tank levels to avoid overfilling - Spill response equipment on-site during refuelling operations - Any spills cleaned up immediately • Chemicals stored on Thevenard Island are kept in secondary containment • A spill kit is maintained on-site during care and maintenance activities • Spill kits are kept fully stocked • Any leak / spill is to be cleaned up immediately

Fluid release from well column	• Contamination of soil • Localised reduction in water quality	• Spill trays will be incorporated in Hazard Analysis / Work Method Statements where a spill risk is identified • Well monitoring and maintenance activities undertaken in accordance with the Petroleum (Resources Management and Administration) Regulations 2015 • Leak and pressure tests conducted to ensure integrity of barriers in place • Chemicals used during well inspection and maintenance activities are kept within secondary containment • A spill kit is maintained on-site during care and maintenance activities • Spill kits are kept fully stocked • Any leak / spill is to be cleaned up immediately
Production tank integrity breach	• Contamination of soil and impact to fauna	• Integrity testing confirms Production Tank T101 is appropriate for oily waste storage • Site inspection conducted during each visit and includes visual inspection of Production Tank and oily waste ISO tanks and general housekeeping of facility to ensure no potential for windblown debris • Cathodic protection (CP) is installed on Production Tank T101 to prevent corrosion • Any leak / spill is to be cleaned up immediately
Third party interference	• Contamination of soil and impact to fauna • Localised reduction in water quality	• Consultation with other users of the island outlining the restrictions on access to the CALM Act Lease operated by Chevron • Groundwater monitoring bores are locked to prevent access • Onshore well valve handles have been removed and wells are within locked fenced area • Offshore platforms have gates and trapdoors that are locked to prevent unlawful access

5.0 Implementation Strategy

The implementation strategy in the EP identifies the systems, practices, and procedures used to ensure the environmental impacts and risks of the activities are continuously reduced to ALARP and the environmental performance outcomes and standards are met.

5.1 Roles and Responsibilities

Personnel with specific responsibilities under the EP were included during the environmental risk assessment and internal review processes, or will be made aware of their role-specific responsibilities through the inductions.

All Chevron personnel and contractors associated with the Thevenard Island care and maintenance activities will undertake the required inductions prior to commencing work. Inductions include a Thevenard Island site induction prior to arriving on site. The induction is tailored to be relevant to the different work scopes and work locations, and includes the requirements outlined in the EP.

5.2 Auditing and Inspections

Audits and inspections relevant to the Thevenard Island care and maintenance activities to be carried out include:

- Environment Plan Compliance Audits
- Environmental Inspections

The environmental inspection includes, but is not limited to, the environmental performance standards / controls included in the EP and in Table 4-1. The inspection will be completed during every campaign visit to Thevenard Island. Any corrective actions will be tracked to closure (with supporting evidence) and signed off as completed by the relevant Supervisor.

5.3 Monitoring and Reporting

The implementation strategy of the EP outlines the monitoring and reporting specific to Thevenard Island care and maintenance activities. Routine monitoring undertaken to ensure compliance with the EP is outlined in Section 2.1.3.

Reporting outlined in the implementation strategy of the EP includes:

- Environmental performance reporting (annually)
- Emissions and discharges reporting (quarterly)
- Recordable incident reporting (monthly)
- Reportable incident reporting (as required)

6.0 Stakeholder Consultation

Chevron has continued to liaise with relevant stakeholders to advise and consult on Thevenard Island care and maintenance activities addressed in this EP. Relevant stakeholders have been engaged in relation to the demobilisation of personnel from Thevenard Island and the movement to periodic, campaigned care and maintenance visits to Thevenard Island.

Table 6-1 provides a summary of recent communications with stakeholders regarding the change in the execution of Thevenard Island care and maintenance activities from on-site management to periodic, campaigned inspection, maintenance and monitoring. Consultation with the stakeholders will be ongoing, as required.

Table 6-1: Stakeholder Consultation for Care and Maintenance Activities

Stakeholder	Issues Discussed and Outcomes
Department of Mines, Industry Regulation and Safety (DMIRS) (formerly Department of Mines and Petroleum)	Initial notification of intent to remove permanent presence on Thevenard Island made on 31 August 2015. Ongoing consultation with regard to planning and development of Well Management Plan, Safety Case and Environment Plan requirements to address change in management of care and maintenance phase.
Department of Water and Environmental Regulation, (DWER) (formerly Department of Environmental Regulation)	Initial discussion with DWER occurred on 28 October 2015 to discuss Chevron's plan to go to zero-manning for the Thevenard Island asset. DWER Licencing Branch advised in December 2015 that the production facilities on Thevenard Island are no longer manned. Discussions with DWER continue regarding Licence L4467/1988/13 and ongoing contaminated site requirements.
Department of Transport (DoT)	Letter sent to the Department of Transport on 11 December 2015 advising that the production facilities on Thevenard Island are no longer manned. No issues were raised.
Mackerel Island Pty Ltd (MIPL)	Chevron representatives met with MIPL on 24 September 2015 and advised of intent to remove permanent presence on Thevenard Island. Discussions with MIPL are ongoing and will be conducted throughout the care and maintenance period.
Department of Biodiversity, Conservation and Attractions (DBCA) (formerly Department of Parks and Wildlife)	DBCA were engaged during the development of the EP, and items raised were discussed during a meeting held between DBCA and Chevron WA Oil Environment representatives on 14/04/2016. No further concerns were raised, and Chevron will continue to liaise with DBCA in relation to long term management of the environment on Thevenard Island.
Department of Water and Environmental Regulation, (DWER) (formerly Office of the Environmental Protection Authority)	Notification provided to DWER advising that the production facilities on Thevenard Island are no longer manned. No issues were raised. The DWER will be provided a copy of the final EP for information.