360 environmental

# Bridging Document to Environment Plan (ID 77777)

## Stokes Bay-1 and Point Torment and Associated Infrastructure, Care and Maintenance and Clean-Up Activities

**Prepared for**

**Rey Resources Limited**

**July 2020**

people • planet • professional

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## Disclaimer

# List of Acronyms

| Acronym | Detail |
|---|---|
| AH Act | *Aboriginal Heritage Act 1972* |
| AHIS | *Aboriginal Heritage Inquiry System* |
| ALARP | as low as reasonably practicable |
| APPEA | Australian Petroleum Production and Exploration Association |
| BC Act | *Biodiversity Conservation Act 2016* |
| BF Act | *Bush Fires Act 1954* |
| BoM | Bureau of Meteorology |
| BTEX | Benzene, Toluene, Ethylbenzene and Xylene |
| CAMBA | China and Australia Migratory Bird Agreement |
| CS Act | *Contaminated Sites Act 2003* |
| DAA | Department of Aboriginal Affairs |
| DBCA | Department of Biodiversity, Conservation and Attractions |
| DEC | Department of Environment and Conservation |
| DoEE | Department of the Environment and Energy |
| DoW | Department of Water (now DWER) |
| DMIRS | Department of Mines, Industry Regulation and Safety |
| DMP | Department of Mines and Petroleum (now DMIRS) |
| DWER | Department of Water and Environmental Regulation |
| DPaW | Department of Parks and Wildlife |
| DRF | Declared Rare Flora |
| EP | Environment Plan / Exploration Permit |
| EP Act | *Environment Protection Act 1986* |
| EPBC Act | *Environment Protection and Biodiversity Conservation Act 1999* |
| EMP | Environmental Management Plan |
| EMS | Environmental Management System |
| EPA | Environmental Protection Authority |
| EPP | Environmental Protection Policy |
| ESA | Environmentally Sensitive Area |
| IBRA | Interim Biogeographic Regionalisation of Australia |
| JAMBA | Japan and Australia Migratory Bird Agreement |
| MNES | Matters of National Environmental Significance |
| MRWA | Main Roads Western Australia |
| MSDS | Material Safety Data Sheet |
| NATA | National Association of Testing Authorities |

| Acronym | Detail |
|---|---|
| NEPM | National Environment Protection Measures |
| NOPSEMA | National Offshore Petroleum, Safety and Environmental Management Authority |
| NT Act | *Native Title Act 1993* |
| OGUK | Oil and Gas UK |
| OSCAR | Online System for Comprehensive Activity Reporting |
| OSCP | Oil Spill Contingency Plan |
| PDWSA | Public Drinking Water Supply Area |
| PEC | Priority Ecological Communities |
| PGER Act | *Petroleum and Geothermal Energy Resources Act 1967* |
| PGERR | *Petroleum and Geothermal Energy Resources Regulations 2012* |
| PGER(E)R | *Petroleum and Geothermal Energy Resources (Environment) Regulations 2012* |
| RIWI Act | *Rights in Water and Irrigation Act 1914* |
| ROKAMBA | Republic of Korea and Australia Migratory Bird Agreement |
| Rey | Rey Resources Limited |
| RLS | RLS Lennard Shelf Pty Ltd |
| SMS | Safety Management System |
| TEC | Threatened Ecological Communities |
| TRH | Total Recoverable Hydrocarbons |

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# 1 Introduction

## 1.1 Overview

Rey Resources Limited (Rey) is an ASX-listed company (ASX.REY) focused on exploring and developing energy resources in Western Australia's Canning and Perth Basins.

Rey acquired the Gulliver Productions Pty Ltd (Gulliver) assets of Stokes Bay-1 and Point Torment-1 well sites in Retention Lease R1 and the West Kora-1 well site in Production Licence L15 (**Figure 1**) and is conducting care and maintenance and clean-up activities. An inspection was undertaken by the then Department of Mines and Petroleum (DMP), (now Department of Mines, Industry Regulation and Safety (DMIRS)) in April 2016 on the sites.

## 1.2 Existing Environment Plan (EP 7777_Revision F)

An Environment Plan (EP) (EARS ID 7777_Revision F) was prepared by Focused Vision Consulting (2019) and approved by DMIRS on the 26 April 2019. The EP was prepared for the care and maintenance and clean-up activities for the West Kora-1, Stokes Bay-1 and Point Torment-1 wells and their associated infrastructure and has been developed in accordance with the (then) Department of Mines and Petroleum (DMP) publication 'Guideline for the Development of Petroleum and Geothermal Environment Plans in Western Australia' (DMP guideline, DMP November 2016) under the *Petroleum and Geothermal Energy Resources (Environment) Regulations 2012* (PGER(E)R).

Further, the EP provided Rey with a practical environmental performance tool for these activities. The care and maintenance and clean-up activities being undertaken include:

- Re-establishment of roads/tracks for access to the well sites and associated infrastructure
- Annual well site inspection
- Well integrity assessments to ensure all wells and infrastructure are functional and secure
- Collecting soil samples to confirm absence of elevated hydrocarbon levels and contamination
- General clean-up around each of the well sites to remove corroded and obsolete infrastructure, and the infilling of existing cuttings and flare pits at the Stokes Bay-1 and Point Torment 1 sites, respectively.

The EP was developed to identify the key risks and potential environmental impacts during the proposed activities at Stokes Bay-1, Point Torment-1, West Kora-1 and the West Kora Tank Farm and to provide detailed management and mitigation strategies to minimise environmental impacts during the activities. The activities specifically excluded from the scope of the EP were:

- Pre-commissioning activities, including hydrotesting and dewatering
- Activities associated with in-well servicing and maintenance
- Infill well development.

These activities were not proposed be undertaken as part of the care and maintenance and clean-up activities. If there is a requirement to undertake these activities at a later date, it was agreed a separate EP would be prepared to address these activities.

## 1.3 Amendment to the Scope of EP 7777

The EP referred to in section 1.2 has since been updated by 360 Environmental Pty Ltd as the parameters of the Geochemical survey changed.

The geochemical survey was updated to include 150 soil samples taken at approximately 100 m intervals along three lines in Retention Lease R1. The updates consequently exclude West Kora-1 well site (Production Licence L15) from the scope of the geochemical survey. The soil samples will be taken as follows:

- Line 1 includes 42 sampling points
- Line 2 includes 38 sampling points
- Line 3 includes 70 sampling points.

## 1.4 Amendment to Listed Activities in EP 7777

Whilst undertaking the site care and maintenance activities described above, a 50 kilolitres (kL) water tank containing oily/water liquid was encountered in the West Kora Tank Farm area, see Figure 2. Two samples from the tank were undertaken on 5$^{th}$ September 2019 to determine the contents of the tank, the samples were analysed by a NATA accredited laboratory. The results indicated that the tank consists of water (5 kL) and Crude Oil (45 kL). Refer to Appendix A for the Certificate of Analysis. It is required to either dispose of the oily water contents to West Kora-1 and/or a licenced facility and decommissioning of tank *insitu* or potential removal of the tank to controlled waste facility.

Specific activities approved for the West Kora Tank Farm in the EP 1777 are as follows:

- Remove flowlines and associated gate/ball valves
- Remove perimeter fencing and any other steel items (including any underground piping, if present, deemed unsuitable for future use)
- Clear any vegetation necessary for access and removal of tanks (exempt from requiring a Clearing Permit under Regulation 5, Item 15, of the Environmental Protection (Clearing of Native Vegetation) Regulations 2004 – 'Clearing to maintain existing cleared areas around infrastructure')
- Remove tanks offsite for refurbishment

These activities were initially required to be undertaken by September 2019 before being extended to June 2020. The purpose of this bridging document is to extend this timeframe until March 2021. Whilst the water tank will not impact the geochemical survey, the water tank will however, be removed from West-Kora-1 prior to Match 2021. This removal date has been extended due do the COVID-19 pandemic.

**Figure 1: Storage Tanks at West Kora Tank Farm**

## 1.5 Licence Holder and Operator Details

Rey Resources Limited is the registered operator of R1 and L15 under the PGER(E)R. **Table 1** and **Table 2** outlines the Titleholder and Operator Contact details.

**Table 1: Titleholder Details**

| Titles | Details | Titleholders | Operator | Address |
|---|---|---|---|---|
| R1 | Retention Lease | Rey Resources Limited | Rey Resources Limited | Suite 2<br>3b Macquarie Street<br>Sydney NSW 2000 |
| L15 | Petroleum Production Licence | Rey Resources Limited | Rey Resources Limited | Suite 2<br>3b Macquarie Street<br>Sydney NSW 2000 |

**Table 2: Rey Resources Limited Contact Details**

| | |
|---|---|
| **Company Name** | Rey Resources Limited |
| **Nominated Liaison Person** | Stanley Fu |
| **Position** | Operations Manager |
| **Business Address** | Level 6, Suite 2, “Blue Tower” 12 Creek Street, Brisbane QLD 4000 |
| **Telephone Number** | +61 401 019 364 |
| **Email Address** | StanleyFu@reyresources.com |

If the operator or contact details change, Rey Resources Limited will notify DMIRS in accordance with the PGER(E)R.

## 1.6 Environmental Legislation, Guidelines and Policy

This section is as per the EP 77777 as there have been no amendments or changes in the applicable Legislation, Codes of Practice and international Agreements and Conventions. Specific legislation relating to the clean-up activities of the water/oil liquid at West Kora Tank Farm are described below.

### 1.6.1 Contaminated Sites Act 2003

The *Contaminated Sites Act 2003* (CS Act) provides for the identification, recording, management and remediation of contaminated sites. The CS Act complements the EP Act and addresses contamination and legacy issues not regulated under the EP Act. The CS Act requires that known or suspected contamination is reported to DWER, investigated and, if necessary, remediated.

No contaminated sites are known to occur or have been recorded within the project area. However, a water tank containing Crude Oil was encountered on L15. It is unknown if the integrity of the storage tank has been compromised leading to adjacent soil contamination. During the decommissioning of the tank, visual assessment and soil samples will be completed.

If soil contamination has occurred it will be remediated and disposed of in accordance with DWER guidelines.

### 1.6.2 Environmental Protection (Controlled Waste) Regulations 2004

The Department of Water and Environmental Regulation (DWER) regulates the transportation of controlled waste on roads in Western Australia. DWER does so by administering the *Environmental Protection (Controlled Waste) Regulations 2004* (the Regulations) under the *Environmental Protection Act 1986* (EP Act). The Regulations provide for the licensing of carriers, drivers, and vehicles involved in transporting controlled waste on roads in Western Australia.

A carrier must hold a licence relevant to the type of controlled waste they transport. A person transporting bulk controlled waste (i.e. liquid waste within a tank) on a road must hold a controlled waste driver licence. All vehicles or tanks transporting bulk controlled waste must be licenced. The Controlled Waste Regulations also provide for the tracking of controlled wastes from the point of generation to unloading at an approved waste facility through the use of controlled waste tracking forms.

# 2 Description of the Additional Activity

To meet the requirements of Part 2 Division 3, Regulation 14(1) of the PGER(E)R, *Description of the Activity*, this Bridging Document describes the proposed activities which are in addition to those approved in the EP 77777 within Production Licence 15 (L15) and Retention Licence 1 (R1).

The additional activities proposed include the following:

- Undertake integrity testing of the tank
- Determine appropriate disposal methods of the oily material using the waste hierarchy methods (e.g. find a beneficial use of the product, such as re-sale or recycling, on sale to Buru Energy), pump the material out of the tank and transport offsite.
- If a beneficial use cannot be sought, the oil will be disposed of in accordance with *Environmental Protection (Controlled Waste) Regulations 2004* to a licenced waste facility as required by the Department of Water and Environmental Regulation (DWER). This will involve the removal of the storage tank (and material) via mobile storage tanker trucks offsite to a licenced waste facility
- If there is evidence of soil contamination an investigation is warranted to determine whether remediation is required. If soil contamination has occurred, it will be remediated and disposed of in accordance with DWER guidelines under the Contaminated Sites Act 2003.
- Extend the timeframe for the clean-up of the West Kora Tank Farm until March 2021
- The geochemical survey lines and the samples on each line has been updated to: Line 1 includes 42 sampling points, line 2 includes 38 sampling points and line 3 includes 70 sampling points. All lines occur within R1.

The location of Retention Lease R1 is approximately 20 km north east of Derby, Western Australia. R1 is located on Meda Pastoral Station. Figure 2 shows the location of R1 and L15, although the geochemical survey is restricted to R1.

The West Kora Tank Farm is accessed by the northern pastoral lease track which joins the Derby-Gibb River Road. The Tank Farm is largely overgrown, but the tanks and flowlines are in sound condition, although empty, and the gate valves on the storage tanks and ball valves on the flowlines are closed and secured (Figure 1).

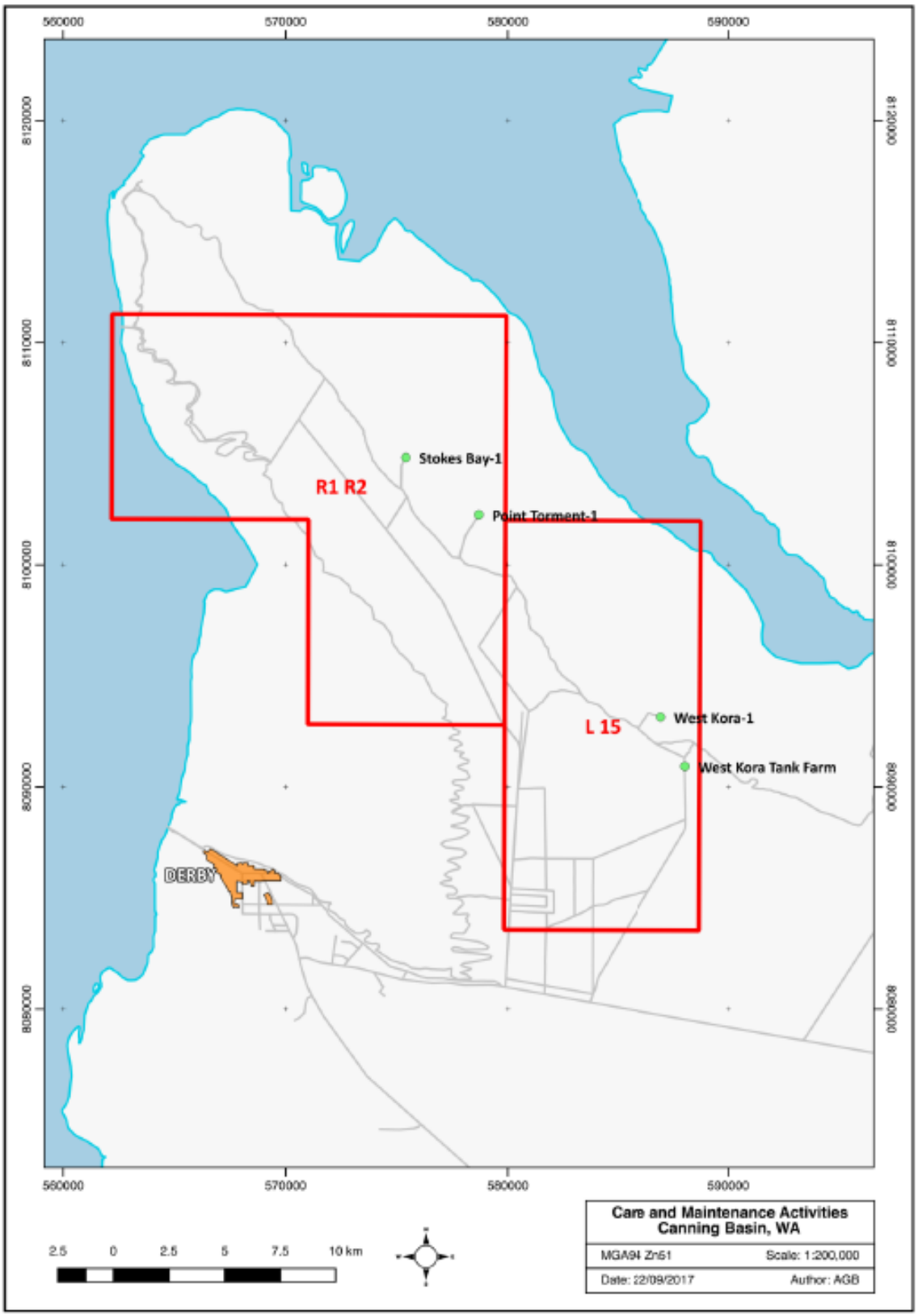



**Figure 2: Location of the West Kora Tank Farm and Petroleum Titles**

## 2.1 Timeframes

It is anticipated that the care and maintenance activities approved in EP77777 will be undertaken annually during the dry season to enable access to the well sites and associated infrastructure.

The Geochemical Survey is proposed to occur mid 2020. The activities specifically associated with the West Kora Tank farm are proposed to occur prior to March 2021, with the tank remaining on site until an alternative disposal method can be sought. This timeframe has been expended due to the COVID-19 pandemic.

## 2.2 Clean-up Activities – resulting from 2016 DMP Inspection

As described in the EP 77777, an inspection undertaken by DMP (2016) identified several opportunities for improved environmental management at all of the well sites and associated infrastructure. The then operator, Gulliver Productions, addressed the majority of these inspection findings with activities conducted on site in August 2017 (Gulliver Productions 2017). The remaining activities required to be undertaken within the West Kora Tank farm area is summarised in Table 3.

**Table 3: Summary of Site Work Activities to be Undertaken as a Result of the 2016 DMP Inspection**

| Site | Activity |
|---|---|
| West Kora Tank Farm | Remove flowlines and associated gate/ball valves<br>Remove perimeter fencing and any other steel items (including any underground piping, if present, deemed unsuitable for future use)<br>Clear any vegetation necessary for access and removal of tanks (exempt from requiring a Clearing Permit under Regulation 5, Item 15, of the Environmental Protection (Clearing of Native Vegetation) Regulations 2004 – 'Clearing to maintain existing cleared areas around infrastructure')<br>Remove tanks offsite for refurbishment |
| All locations | Remove any household waste |

## 2.3 Vehicles and Equipment to be Used on Site

The Geochemical Survey will involve the use of one light vehicle and one personnel only.

Vehicles and equipment used for infrastructure removal and clean-up are expected to include a float truck (for mobilisation of a bulldozer and an excavator), light vehicles for personnel transport and support; a truck equipped with a Hiab crane for lifting equipment for removal offsite, a service truck containing service fluids, a generator and a range of hand tools.

## 2.4 Refuelling of Mobile Equipment

Refuelling of mobile equipment on site will not be required.

## 2.5 Waste Management

Expected waste generated during planned activities includes:

- General/operation waste (rags, containers etc.)
- Putrescible waste (food scraps and associated rubbish).

All waste products generated will be stored in appropriate waste receptacles with fitted lids. All waste will be removed from site and disposed of at appropriate facilities on completion of each care and maintenance activity campaign. Recycling of appropriate materials will occur where reasonably practicable to do so. No chemicals or hazardous substances will be used during the survey.

Waste management will be undertaken in accordance with Gauge's Waste Management Procedure (See Appendix B in current Approved EP, 2019- Rev F).

Disposal of the waste oil material will be undertaken in accordance with the *Environmental Protection (Controlled Waste) Regulations 2004.*

# 3 Description of Environment

The EP provides an overview of the existing environment for the project area, which indicates that the site is within existing cleared land where there are no identified Cultural Heritage sites, European Heritage sites, Threatened flora or fauna or any direct impact on an Environmentally Sensitive Area (ESA). No Threatened Ecological Communities (TEC) listed on the *Environment Protection Biodiversity Conservation Act 1999* Protected Matters Database were known to occur within 50 km of the project area. One TEC, listed as Vulnerable by the State Minister of Environment, is known to occur within the 50 km buffer of the well sites area; 'Assemblages of Big Springs organic mound springs' (DBCA 2018b). This TEC is approximately 27 km north-east of the well sites area and is therefore unlikely to be impacted by the proposed care and maintenance activities (Focused Vision Consulting, 2019). For further information refer to Section 3.0 of the EP (Focused Vision Consulting, 2019).

The well sites lie in the Fitzroy River catchment, which covers an area of approximately 85,000 $km^2$. The Fitzroy River is the major river system in the basin, rising in the King Leopold and Mueller Ranges, with vast alluvial floodplains and extensively braided river channels throughout. Flows occur between November and May following the seasonal rainfall. High tides in the Derby area are up to ten metres high, requiring high drainage.

As activities will be conducted in mid 2020, or prior to the full onset of the wet season, no disturbance to water flow or sedimentation is expected.

While there is little to no remnant vegetation within the vicinity /location of the tank, the area has been regionally mapped within the Fitzroy Sandplains Complex which generally comprises of Descript: Shrublands, pindan; *Acacia tumida* and *A. oimpressa* shrubland with scattered low bloodwood and *Eucalyptus setosa* over ribbon and curly spinifex (Western Australian Local Government Authority, 2018).

# 4 Environmental Risk Assessment and Management

This section details the methodology applied, and outcomes of the environmental risk assessment for the proposed care and maintenance activities associated with removal of crude oil/water from the storage tank and the decommission and removal of the tank off site.

An updated environmental risk assessment has been undertaken to address this proposed activity.

## 4.1 Identification of Activities, Events and Associated Environmental Aspects

The environmental risk assessment process identifies aspects of the care and maintenance and clean-up activities that require management and assigns a level of risk to each activity. This risk assessment process applied to the care and maintenance and clean-up activities has been based on the principles of Australian Standards HB 203:2006 Environmental Risk Management and AS/NZS ISO 31000:2009 Risk Management – Principles and Guidelines. The following environmental risk assessment was completed accordance with Section 4.0 of the EP (Focused Vision Consulting, 2019).

### 4.1.1 Identification of Environmental Values and Sensitivities

The environment that may be affected by care and maintenance and clean-up activities is described in Section 3. There are no sensitive receptors that are locally or regionally important that may be affected by the removal of the Crude oil/water and decommissioning of the storage tank. Based on the DMIRS Guideline for the Development of Petroleum and Geothermal Environment Plans in Western Australia (DMIRS 2016), receptors considered to be sensitive include:

- Areas of protected or rare and endangered flora and fauna
- Areas of significant habitat (including wetlands and mangroves)
- Areas of temporal significance (including breeding grounds, migration routes and resting and aggregation areas)
- Cultural and heritage sites
- Marine and terrestrial protected areas
- Groundwater.

### 4.1.2 Identification of Relevant Environmental Aspects and Hazards

In this risk assessment, aspects are defined as an element of the proposed operation that has the potential to interact with the environment at present or later. A hazard is defined as a chemical or physical condition with the potential for causing damage or injury to people, property or the environment. The aspects identified were used to determine environmental hazards associated with the care and maintenance and clean-up activities that had the potential to cause environmental damage. The results of this assessment are included in Table 4. This information was then used to undertake the environmental risk assessment.

**Table 4: Hazard Identification Process and Risk Assessment and Relevant Legislation**

| Hazard Identification Process | Relevant Standards and Legislation |
|---|---|
| Identifying aspects of the project that may impact the environment | PGER(E)R 2012 Part 2 Division 3 - Regulation 14 (2, 3 and 4)<br>(AS/NZS ISO 31000:2009) |
| Describing potential environmental impacts | |
| Assessing the likelihood of the impact | |
| Determining the level of risk with and without mitigation measures | |
| Assigning a consequence rating to the impact | PGER(E)R 2012 Part 2 Division 3 - Regulation 14 (5)<br>(AS/NZS ISO 31000:2009) |
| Identifying practical management strategies | PGER(E)R 2012 Part 2 Division 3 - Regulation 14 (5) and Regulation 15<br>(AS/NZS ISO 31000:2009) |

## 4.2 Evaluation of Impacts and Risks

Impacts and risks associated with the West Kora Tank Farm clean-up activities have been identified and assessed in the approved EP77777 (see Section 4.2 within EP77777). Proposed activities described in this bridging document are detailed in Section2.

Mitigation strategies have been considered and the residual risk (risk rating remaining after control measures have been put in place) has been calculated for each aspect of the removal of oil/water from the storage tanks at West Kora and the decommissioning and removal of the tank, refer to Appendix B.

# 5 Implementation Strategy

The details and strategy to ensure that environmental impacts and risks associated with the removal of crude oil/water from storage tank and removal or tank for disposal off-site at the West Kora Tank Farm area will be as per the Implementation Strategy in Section 5.0 of the approved EP 7777 (Focused Vision Consulting 2019).

## 5.1 Systems, Practices and Procedures

This section outlines the proposed practices, management strategies, procedures and mitigation measures that Rey and their contractors will implement to ensure environmental hazards and impacts caused by the activities associated with the removal of crude oil/water from West Kora Tank Farm to ensure all legal and corporate obligations are met.

Management strategies for all potential environmental risks for the well sites area include:

- RLS Environmental Management System (RLS_EMS_SYS_001)
- RLS Induction and Training Procedure (RLS_CMS_PRO_009_Rev_0)
- RLS Environmental and Heritage Management Plan (RLS_EMS_MPL_001_REV_A)
- RLS Spill Response Procedure (RLS_CMS_PRO_011)
- Rey Resources Emergency Response Procedure (RLS_CMS_PRO_006_Rev_0)
- inGauge Equipment Refuelling Procedure (ING_PRO_ER_01)
- inGauge Waste Management Procedure.

Roles and responsibilities of key personnel for the identified management strategies are also outlined in Section 5.3.

## 5.2 Chain of Command

To meet the requirements of Regulation 15(4) of the PGER(E)R, a clear chain of command for the implementation of the additional activity is outlined in Figure 3. Detailed roles and responsibilities are described in Section 5.3.

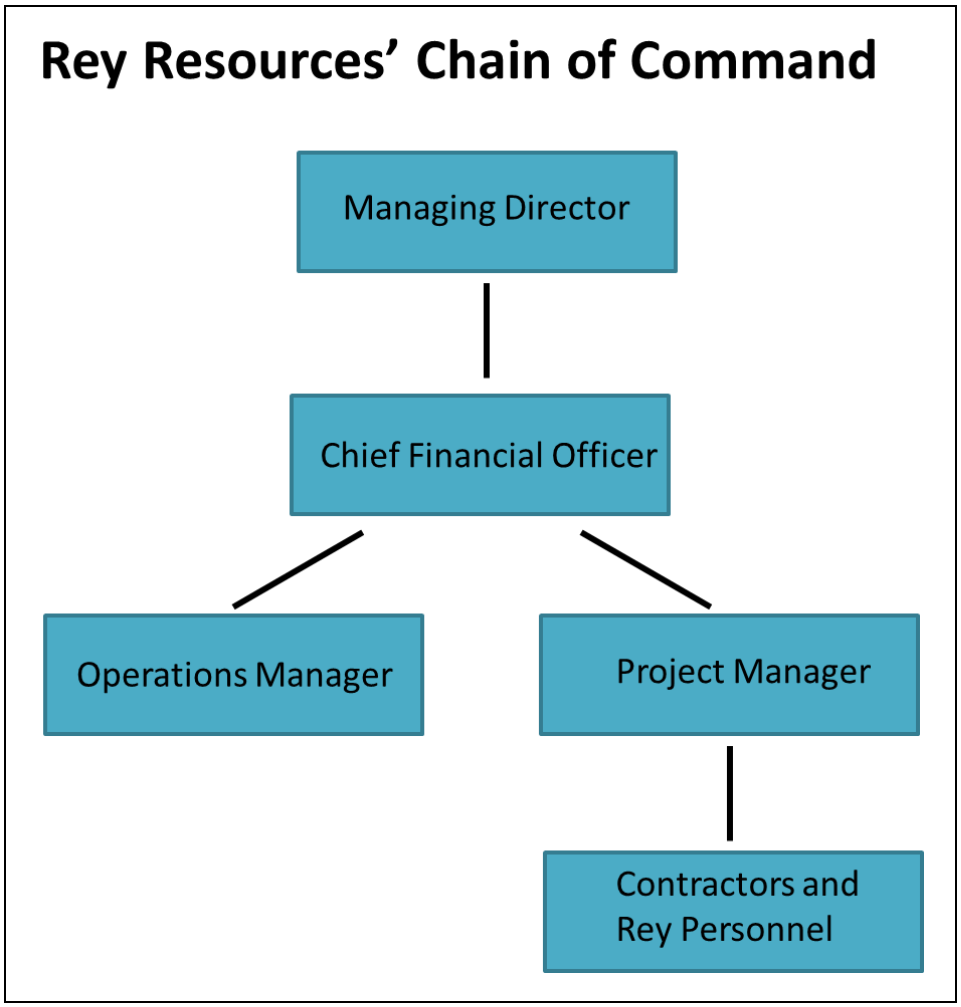



**Figure 3: Chain of Command**

## 5.3 Roles and Responsibilities

This bridging document and all of its controls and commitments will be implemented and managed by Rey. In accordance with the EP (2020), all site activities will be conducted in the field under the direct supervision of a Rey Site Supervisor or approved delegate. Roles and Responsibilities of key personnel for the identified management strategies are defined in Table 5.

**Table 5: Roles and Responsibilities**

| Role | Responsibility |
|---|---|
| Rey Operations Manager (or delegate) | Ensure the EP is implemented to the satisfaction of the DMIRS and in accordance with all legal requirements<br>Provide resources for the effective implementation of the EP<br>Identify and support implementation of risk-based environmental improvement plans<br>Ensure appropriate and effective emergency response capability<br>Facilitate communication with company personnel, government and the public in the event of an incident and undertakes full investigation of the incident |

| Role | Responsibility |
|---|---|
| | Ensure all personnel receive environmental training, induction and awareness programs applicable to their position<br>Update and maintain induction materials and records<br>Conduct (or coordinate) and review environmental audits to assess compliance with environmental requirements<br>Undertake internal auditing on completion of care and maintenance and clean-up activities |
| Site Supervisor - Care and Maintenance Campaign Visits | Implement the EP and ensure compliance with the EP as relates to the care and maintenance activities for the well sites and associated infrastructure<br>Ensure that Rey and contracting company's environmental procedures and emergency response procedures are communicated and understood by all personnel<br>Ensure appropriate induction and environmental education of the workforce<br>Maintain clear communications between Rey and the workforce<br>Ensure that Rey and the Contractor's work procedures are compliant with this bridging document and EP (2019)<br>Ensure site inspections are carried out as required<br>Ensures emergency response and spill response is carried out in accordance with the EP (2019) and relevant procedures<br>Report incidents immediately to Rey (e.g. all spills of hydrocarbons and/or chemicals)<br>Ensure procedures are carried out correctly |
| General Workforce (all contractors and Rey employees) | Effectively apply work procedures<br>Actively seek and participate in appropriate training and induction<br>Identify hazards and encourage improvement and risk reduction wherever possible<br>Immediately report any incidents or near misses to supervisor |

## 5.4 Emergency Response

The Rey Emergency Response Procedure will provide guidance for personnel on what needs to be done in the event of an emergency whilst on the work site. It provides organisational structures, management processes, and the tools necessary to respond to emergencies and to prevent or mitigate emergency and/or crisis situations; respond to incidents in a safe, rapid, and effective manner; and, restore or resume affected operations.

### 5.4.1 Oil Spill Response Plan

Hydrocarbon and chemical spills considered during the risk assessment are discussed in Section 4.2 and summarised in Table 6.

Spill response will be undertaken in accordance with the Rey Resources Spill Response Procedure (RLS_CMS_PRO_011_REV_0).

**Table 6: Credible Spill Scenarios during Care and Maintenance Activities**

| Spill Scenario | Maximum Credible Volume |
|---|---|
| Diesel or Petrol spill during transport | 100 L |
| Diesel or Petrol spill during refuelling | 20 L |
| Release of fluid during well maintenance | 50 L |

Definitions of spill levels are provided in Table 7.

**Table 7: Definitions of Spills**

| Magnitude of Spill | Definition |
|---|---|
| Minor spill | Spill contaminates the surface of the ground not in excess of 0.50 m2 in area and 0.50 cm in depth. The spill can be effectively contained and cleaned up by a single department or team using the containment kit, plastic packets and / or a pressure hose. |
| Moderate spill | A spill that would require the assistance of other departments or teams to contain and clean up (i.e. use of additional clean up kits, personnel or equipment). |
| Major spill | A spill that cannot effectively be contained or cleaned up with the resources available on-site. External contractor or emergency services help is required. |

Immediate action by all personnel in the event of a spill is containment to the best of their ability given equipment available to them, and as long as there is no risk to safety. Containment must be attempted prior to any other actions, including notification.

The first point of contact for all staff reporting a spill is the Site Supervisor. Depending on the severity of the incident, Rey's management may also be contacted.

The Site Supervisor (or most senior person on-site at the time of the spill) assesses the spill to determine severity and implements the appropriate response according the clean-up response (i.e. 'minor to moderate spill pathway' clean-up process or 'major spill pathway' clean-up process).

When containing and cleaning up spills, personnel are to ensure all safety precautions are in place i.e. PPE, chemical PVC gloves, and ensuring fire extinguishers are readily available, no one is smoking and all vehicle engines are switched off.

All efforts must be aimed at rapidly deploying the containment kit, which will be stored on the service vehicle, and/or sand so as to reduce the spillage area as much as possible, and always work up hill and up wind from the spill.

Following any spill, every effort should be made to restore the affected area to its original condition, ensuring all contaminants are removed and disposed of correctly.

In the event of a minor to moderate spill:

- Personnel must immediately obtain the emergency response clean-up/containment kit
- Contain spread by constructing a bund around the spill area (i.e. with rocks or sand)

- For ground spills, use spill kit material to absorb maximum amount of fluid possible, then transfer fluid-soaked materials into plastic contaminated waste bags
- Use a shovel to dig up and remove any contaminated sand, gravel or rocks and also transfer into plastic contaminated waste bags
- Label all plastic contaminated waste bags with type and estimated quantity of spilt material place in the designated contaminated soils / solid waste bins on site, which are to be removed off site at the end of each care and maintenance campaign
- Restore the terrain to its original condition (using earth-moving equipment to back blade the site, or shovels to fill in any holes as required).

In the event of a major spill:

- Cordon off the area and make it safe
- If on a major road, immediately call the local police and/or Emergency Services so that they may control the scene and coordinate the clean-up, and also advise of the most appropriate action prior to their arrival
- If an associated fire hazard, evacuate the area immediately to a minimum distance of 500 m and await the arrival of the Emergency Services
- Until the police or Emergency Services arrive, the Site Supervisor and/or most senior staff member at the site of the spill will be in charge of the scene, assigning personnel/resources to area as necessary
- Notify a licensed spill response company about the required clean-up
- Personnel should be safely positioned to warn, slow down, and if necessary redirect traffic around the hazard pending the arrival of Emergency Services or Police
- Vehicles are to be parked on the side of the road, uphill and upwind, well away from the spill, with beacon lights and emergency hazard lights on
- A licensed third party will undertake the spill clean-up, with the assistance of site crew, as required.

All spills are to be reported to the Site Supervisor and in accordance with Event and Feedback Reporting and Investigation Procedure (RLS_CMS_PR_007).

Rey's management will ensure any hydrocarbon or chemical spills are reported to the appropriate contacts within the DMIRS, in accordance with Section 5.7.4.

During care and maintenance campaigns, weekly audits and inspections of all spill kits will be undertaken by the Site Supervisor or delegate in order to ensure that kits are complete, located on the service vehicle and ready for use in case of a spill. Audits and inspections of spill kits will also be undertaken by the Site Supervisor or delegate following any spill incidents. All inspection reports will be kept and maintained in Rey's Inspection and Audit Register (RLS_CMS_REG_008).

### 5.4.2 Record Keeping

Recording keeping of the activities associated with the disposal of the oily water contents to West Kora-1 and/or a licenced facility and decommissioning of tank *insitu* or potential removal of the tank to controlled waste facility will be completed is accordance with Sections 5.6 and 5.7 of the EP (2020).

## 5.5 Consultation

Rey has a formal Stakeholder Engagement Register (RLS_CMS_REG_007), and a Stakeholder Engagement Plan (RLS_CMS_MPL_001) has been prepared in order to undertake and maintain an auditable structured source of information for all ongoing consultation associated with the activities.

A range of stakeholders have been consulted to date by the previous title holders, regarding the care and maintenance activities at the well sites area. It is suggested that the disposal of the oily water contents to West Kora-1 and/or a licenced facility and decommissioning of tank insitu or potential removal of the tank to controlled waste facility, falls within the care and maintenance activities as per the EP (2020).

The stakeholders previously identified include the Shire of Derby/West Kimberley, Department of Parks and Wildlife (part of the now DBCA), Department of Water, DMP (now DMIRS), Jumbuck Pastoral Office (Holder of Meda Station Pastoral Lease), Department of Transport (Marine Division) and relevant Aboriginal Community Leaders. Due to the nature and scale of this additional activity, the level of ongoing consultation is planned to be minimal.

In accordance with Regulation 17 of PGER(E)R, Rey Resources consider the following stakeholders to be relevant to the additional activities within this bridging document:

**Table 8: Relevant Stakeholders**

| Stakeholder | Relevance Justification | Relevant to this Bridging Plan |
|---|---|---|
| Shire of Derby/West Kimberley | The activity is located within this shire thus they are considered a relevant stakeholder | Yes |
| Department of Biodiversity, Conservation and Attractions | The activities are not within / nor near lands that are managed by DBCA with the closes reserve located over 72 km away. | No |
| Department of Water end Environmental Regulation | While there are no licences in place, nor planned emissions to land or waters associated with this activity that meet licence thresholds. Should there be soil contamination, remediation may be required on site | Potential subject to outcomes of further investigation if required. |
| Jumbuck Pastoral Office (Holder of Meda Station Pastoral Lease) | The petroleum titles overlay the Meda station thus activities have the potential to interfere with their activities thus are considered a relevant stakeholder. | Yes |
| Department of Transport (Marine Division) | Given that these activities are solely onshore, with no spill risk to the marine environment, this stakeholder is not considered relevant | No |
| Aboriginal Community Leaders | Given a current Native Title claim exists over the area, and as heritage objects have been previously discovered (Section 3.7), Aboriginal community leaders are considered relevant stakeholders. | Yes |

A summary of the stakeholder engagement register to date for relevant stakeholders associated with the proposed care and maintenance activities is presented in Table 9. This will be maintained and updated regularly by Rey following all external consultation relating to the activity.

**Table 9: Stakeholder Engagement Register**

| Stakeholder | Name and Date of Consultation | Consultation | Activity Related Issue | Objection / Claim? |
|---|---|---|---|---|
| Meda Station | Troy Haslet (Station manager) 13/11/18 | Email | Proposed care and maintenance activities | None raised |
| Shire of Derby/West Kimberley | Stephen Gash (Shire CEO) Martin Cuthbert (Shire EMSC) 25/02/2019 | Email | Proposed care and maintenance activities | None raised |
| Kimberley Land Council | Anthony Watson (Chairman) 25/02/2019 | Email | Proposed care and maintenance activities | None raised |

# 6 Limitations

This report is produced strictly in accordance with the scope of services set out in the contract or otherwise agreed in accordance with the contract. 360 Environmental makes no representations or warranties in relation to the nature and quality of soil and water other than the visual observation and analytical data in this report.

In the preparation of this report, 360 Environmental has relied upon documents, information, data and analyses ("client's information") provided by the client and other individuals and entities. In most cases where client's information has been relied upon, such reliance has been indicated in this report. Unless expressly set out in this report, 360 Environmental has not verified that the client's information is accurate, exhaustive or current and the validity and accuracy of any aspect of the report including, or based upon, any part of the client's information is contingent upon the accuracy, exhaustiveness and currency of the client's information. 360 Environmental shall not be liable to the client or any other person in connection with any invalid or inaccurate aspect of this report where that invalidity or inaccuracy arose because the client's information was not accurate, exhaustive and current or arose because of any information or condition that was concealed, withheld, misrepresented, or otherwise not fully disclosed or available to 360 Environmental.

Aspects of this report, including the opinions, conclusions and recommendations it contains, are based on the results of the investigation, sampling and testing set out in the contract and otherwise in accordance with normal practices and standards. The investigation, sampling and testing are designed to produce results that represent a reasonable interpretation of the general conditions of the site that is the subject of this report. However, due to the characteristics of the site, including natural variations in site conditions, the results of the investigation, sampling and testing may not accurately represent the actual state of the whole site at all points.

It is important to recognise that site conditions, including the extent and concentration of contaminants, can change with time. This is particularly relevant if this report, including the data, opinions, conclusions and recommendations it contains, are to be used a considerable time after it was prepared. In these circumstances, further investigation of the site may be necessary.

# 7 References

APPEA 2008, Code of Environmental Practice, October 2008.

AS 4976 2008, The removal and disposal of underground petroleum storage tanks.

AS/NZS 2009, Risk Management – Principles and Guidelines (ISO 31000:2009).

Department of Mines and Petroleum (DMP) 2016. Environmental Inspection Report AU-15/16-4697. Gulliver Productions Pty Ltd Environmental Compliance Inspections. West Kora-1, Stokes Bay-1 and Point Torment-1 Well Sites. 14 April 2016.

Department of Mines Industry Regulation and Safety (DMIRS) 2016. Guideline for the Development of Petroleum and Geothermal Environment Plans in Western Australia. Department of Mines, Industry Regulation and Safety. Government of Western Australia.

Focused Vision Consulting. 2019. Environment Plan Stokes Bay-1, Point Torment-1 And West Kora-1 And Associated Infrastructure, Care and Maintenance And Clean-Up Activities. Prepared for Rey Resources.

Gulliver Productions 2017. Environment Report. Care and Maintenance Production Licence L15, Retention Licence R1. Document Number GP/ER170919-KP. October 2017.

NOPSEMA 2015. ALARP, Guidance Note N-04300-GN0166 Rev 6, June 2015

# Appendices

# Appendix A
# Certificate of Analysis

Accredited for compliance with ISO/IEC 17025 - Testing)

Accreditation No 2013

# Certificate of Analysis

Gulliver Productions Pty Ltd
3B Macquarie Street
NSW 2000
Australia

**Attention:** Jed Farley

| | |
|---|---|
| **Project** | **19PEAD0003743** |
| Collected by | Client |
| Client Ref: | PREPAID |

| **Customer Sample ID** | | **Top layer Crude Oil** | **Bottom Layer** |
|---|---|---|---|
| **Date Received** | | **09/09/2019** | **12/09/2019** |
| **Sample Type** | | **Crude Oil** | **Crude Oil** |
| **Date Sampled** | | **05/09/2019** | **05/09/2019** |
| Test/Reference | Unit | | |
| **Asphaltenes** IP 143/96 | | | |
| Total Asphaltene | % Wt | 0.25 | 0.30 |
| **Cold Filter Plug Pt.** PT-IP309 | | | |
| CFPP* | °C | -15 | -14 |
| **Density @ 15°C** ASTM D4052 | | | |
| Density at 15°C | g/mL | 0.7938 | 0.7956 |
| Specific gravity @ 60°/60°F | | 0.7942 | 0.7960 |
| API Gravity | °API | 46.7 | 46.3 |
| **Distillation** ASTM D86 / IP 123 | | | |
| Initial Boiling Point | °C | 86.0 | 83.0 |
| 5% Recovery | °C | 110.5 | 112.5 |
| 10% Recovery | °C | 120.5 | 121.5 |
| 20% Recovery | °C | 144.5 | 144.5 |
| 30% Recovery | °C | 170.5 | 172.5 |
| 40% Recovery | °C | 196.5 | 199.5 |
| 50% Recovery | °C | 229.5 | 232.5 |
| 60% Recovery | °C | 262.5 | 264.5 |
| 70% Recovery | °C | 298.5 | 302.5 |
| 80% Recovery | °C | 340.5 | 340.5 |
| 90% Recovery | °C | 366.0 | 364.0 |
| Decomposition Point | °C | 368.0 | 367.0 |
| Residue | % Vol | 3.9 | 2.9 |
| Loss | % Vol | 1.1 | 1.1 |
| **Flash Point** IP 170 | | | |
| Flash Point | °C | <15 | <15 |
| Corrected Flash Point | °C | <15 | <15 |
| **Pour Point** ASTM D97 / IP 15 | | | |
| Pour Point | °C | <-21 | <-21 |
| **Sulphur** IP 336 | | | |
| Sulphur | % Wt | 0.03 | 0.13 |
| **Kinematic Viscosity** ASTM D445 / IP 71 | | | |
| Kinematic Viscosity | cSt | 2.080 | 2.220 |
| Temperature | °C | 40.0 | 40.0 |
| **Water & Sediment** ASTM D4007 | | | |
| Total Percent Water and Sediment | % Vol | <0.05 | 90.00 |
| **Water** ASTM D4377 | | | |
| Water Content* | ppm | 82 | 1198 |

| Customer Sample ID | | | Top layer Crude Oil | Bottom Layer |
|---|---|---|---|---|
| **Date Received** | | | **09/09/2019** | **12/09/2019** |
| **Sample Type** | | | **Crude Oil** | **Crude Oil** |
| **Date Sampled** | | | **05/09/2019** | **05/09/2019** |
| Test/Reference | | Unit | | |
| **Wax Content** PT-UOP46 | | | | |
| Mass of Sample* | | g | 2.004 | 2.011 |
| Mass of Wax* | | g | 0.0417 | 0.0481 |
| Wax Content* | | % Wt | <5 | <5 |
| **LIQUID ANALYSIS** | | | | |
| Test/Reference | | Unit | | |
| **Liquid Analysis** In-house Method GC-02 | | | | |
| -88.6°C | Ethane | Mol % | < 0.01 | < 0.01 |
| -42.1°C | Propane | Mol % | < 0.01 | < 0.01 |
| -11.7°C | I-Butane | Mol % | 0.04 | 0.02 |
| -0.5°C | N-Butane | Mol % | 0.23 | 0.14 |
| 27.9°C | I-Pentane | Mol % | 0.96 | 0.73 |
| 36.1°C | N-Pentane | Mol % | 1.19 | 0.95 |
| 36.1-68.9°C | Hexane; C-6 | Mol % | 5.16 | 4.70 |
| 80.0°C | Benzene | Mol % | < 0.01 | < 0.01 |
| 80.7°C | Cyclohexane | Mol % | 1.23 | 1.18 |
| 68.9-98.3°C | Heptane; C-7 | Mol % | 9.82 | 9.56 |
| 100.9°C | MCH | Mol % | 4.00 | 3.96 |
| 110.6°C | Toluene | Mol % | 0.03 | 0.03 |
| 98.3-125.6°C | Octane; C-8 | Mol % | 11.98 | 12.30 |
| 136.1-144.4°C | Ethylbz + Xyls | Mol % | 0.32 | 0.38 |
| 125.6-150.6°C | C-9 | Mol % | 11.55 | 11.71 |
| 150.6-173.9°C | C-10 | Mol % | 10.15 | 10.41 |
| 173.9-196.1°C | C-11 | Mol % | 7.66 | 7.85 |
| 196.1-215.0°C | C-12 | Mol % | 5.99 | 6.11 |
| 215.0-235.0°C | C-13 | Mol % | 5.82 | 5.93 |
| 235.0-252.2°C | C-14 | Mol % | 4.94 | 5.04 |
| 252.2-270.6°C | C-15 | Mol % | 3.95 | 4.04 |
| 270.6-287.8°C | C-16 | Mol % | 2.86 | 2.84 |
| 287.8-302.8°C | C-17 | Mol % | 2.43 | 2.43 |
| 302.8-317.2°C | C-18 | Mol % | 2.29 | 2.34 |
| 317.2-330.0°C | C-19 | Mol % | 1.77 | 1.81 |
| 330.0-344.4°C | C-20 | Mol % | 1.19 | 1.23 |
| 344.4-357.2°C | C-21 | Mol % | 1.16 | 1.01 |
| 357.2-369.4°C | C-22 | Mol % | 0.77 | 0.81 |
| 369.4-380.0°C | C-23 | Mol % | 0.70 | 0.75 |
| 380.0-391.1°C | C-24 | Mol % | 0.51 | 0.55 |
| 391.1-401.7°C | C-25 | Mol % | 0.40 | 0.43 |
| 401.7-412.2°C | C-26 | Mol % | 0.26 | 0.28 |
| 412.2-422.2°C | C-27 | Mol % | 0.18 | 0.20 |
| >422.2°C | C-28+ | Mol % | 0.46 | 0.28 |
| Total | | Mol % | 100.00 | 100.00 |
| **Calculated Parameter** In-house Method GC-02 | | | | |
| Ave Molecular Wt of C-8+ (calc) | | g/mol | 171 | 171 |
| **Liquid Analysis** In-house Method GC-02 | | | | |
| -88.6°C | Ethane | Weight % | < 0.01 | < 0.01 |
| -42.1°C | Propane | Weight % | < 0.01 | < 0.01 |

| Customer Sample ID | | | Top layer Crude Oil | Bottom Layer |
|---|---|---|---|---|
| **Date Received** | | | **09/09/2019** | **12/09/2019** |
| **Sample Type** | | | **Crude Oil** | **Crude Oil** |
| **Date Sampled** | | | **05/09/2019** | **05/09/2019** |
| **LIQUID ANALYSIS** | | | | |
| Test/Reference | | Unit | | |
| -11.7°C | I-Butane | Weight % | 0.01 | 0.01 |
| -0.5°C | N-Butane | Weight % | 0.08 | 0.05 |
| 27.9°C | I-Pentane | Weight % | 0.44 | 0.34 |
| 36.1°C | N-Pentane | Weight % | 0.55 | 0.44 |
| 36.1-68.9°C | Hexane; C-6 | Weight % | 2.84 | 2.58 |
| 80.0°C | Benzene | Weight % | < 0.01 | < 0.01 |
| 80.7°C | Cyclohexane | Weight % | 0.66 | 0.63 |
| 68.9-98.3°C | Heptane; C-7 | Weight % | 6.30 | 6.10 |
| 100.9°C | MCH | Weight % | 2.51 | 2.47 |
| 110.6°C | Toluene | Weight % | 0.02 | 0.02 |
| 98.3-125.6°C | Octane; C-8 | Weight % | 8.74 | 8.94 |
| 136.1-144.4°C | Ethylbz + Xyls | Weight % | 0.21 | 0.26 |
| 125.6-150.6°C | C-9 | Weight % | 9.50 | 9.53 |
| 150.6-173.9°C | C-10 | Weight % | 9.24 | 9.42 |
| 173.9-196.1°C | C-11 | Weight % | 7.66 | 7.81 |
| 196.1-215.0°C | C-12 | Weight % | 6.53 | 6.62 |
| 215.0-235.0°C | C-13 | Weight % | 6.86 | 6.96 |
| 235.0-252.2°C | C-14 | Weight % | 6.27 | 6.36 |
| 252.2-270.6°C | C-15 | Weight % | 5.36 | 5.46 |
| 270.6-287.8°C | C-16 | Weight % | 4.14 | 4.09 |
| 287.8-302.8°C | C-17 | Weight % | 3.74 | 3.73 |
| 302.8-317.2°C | C-18 | Weight % | 3.73 | 3.79 |
| 317.2-330.0°C | C-19 | Weight % | 3.04 | 3.09 |
| 330.0-344.4°C | C-20 | Weight % | 2.15 | 2.21 |
| 344.4-357.2°C | C-21 | Weight % | 2.20 | 1.90 |
| 357.2-369.4°C | C-22 | Weight % | 1.54 | 1.61 |
| 369.4-380.0°C | C-23 | Weight % | 1.45 | 1.55 |
| 380.0-391.1°C | C-24 | Weight % | 1.11 | 1.19 |
| 391.1-401.7°C | C-25 | Weight % | 0.91 | 0.98 |
| 401.7-412.2°C | C-26 | Weight % | 0.60 | 0.66 |
| 412.2-422.2°C | C-27 | Weight % | 0.44 | 0.49 |
| >422.2°C | C-28+ | Weight % | 1.17 | 0.71 |
| Total | | Weight % | 100.00 | 100.00 |

**Test Description**

**Liquid Analysis**

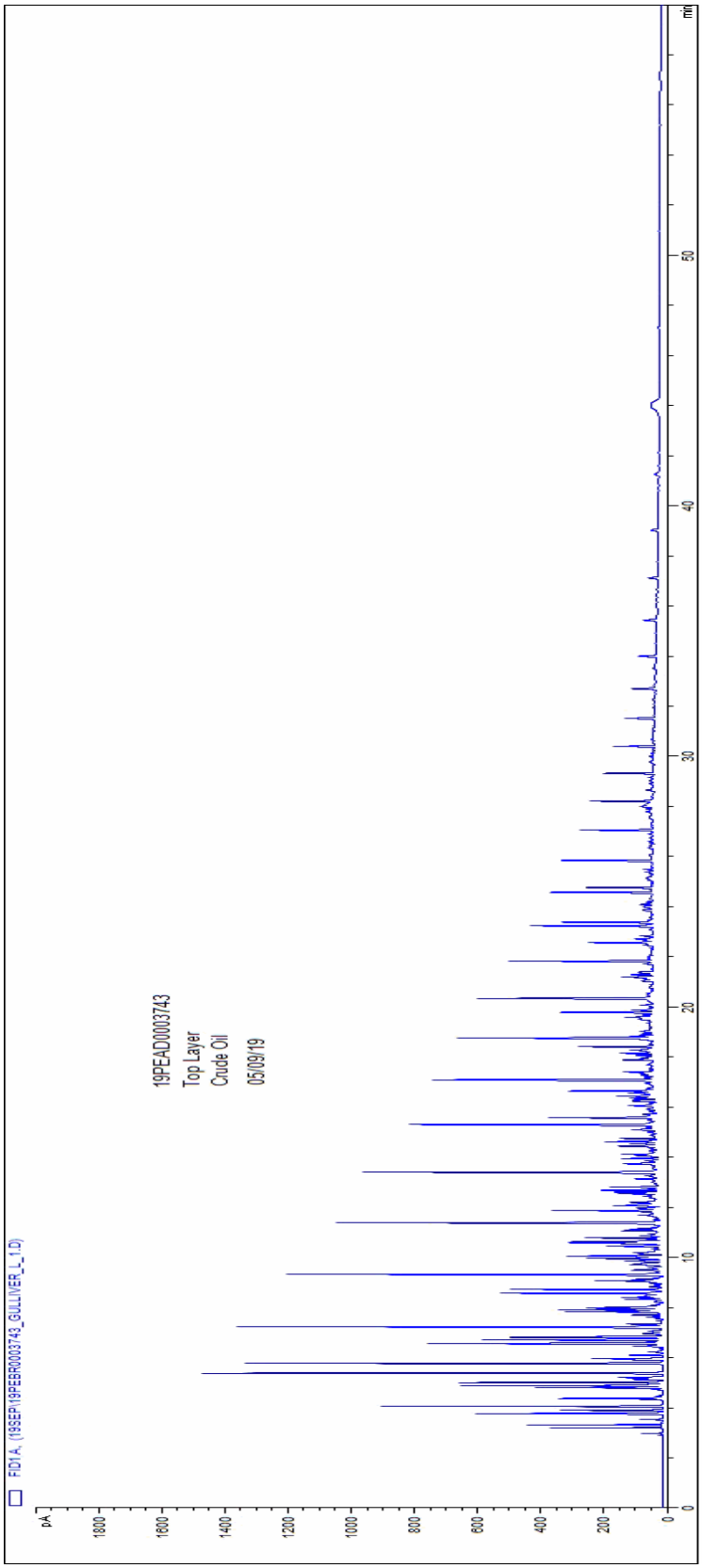
The above boiling ranges refer to the normal paraffin hydrocarbon boiling in that range. Aromatics, branched hydrocarbons, naphthenes and olefins may have higher or lower carbon numbers but are grouped and reported according to their boiling points.

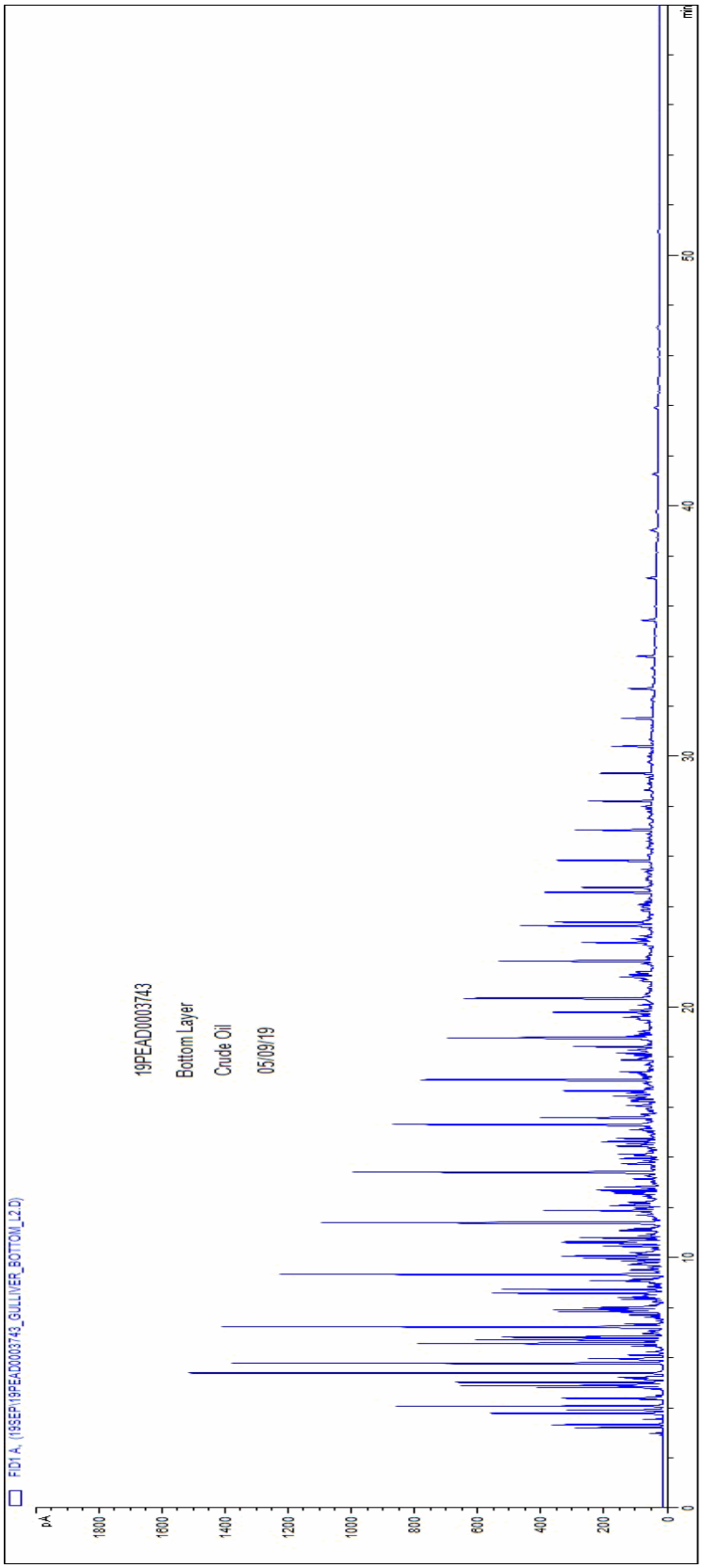
**Sample Comments**

**Bottom Layer**

Please note the KF water content was carried out on the crude oil layer and not the whole sample


Bureau Veritas 33 Cormack Road Wingfield SA Australia 5013
ABN: 30 008 127 802 Telephone: +61 8 8416 5240 Facsimile: +61 8 8234 2933


19PEAD0003743
Top Layer
Crude Oil
05/09/19
FID1 A, (19SEP\19PEBR0003743_GULLIVER_L_1.D)
pA
min



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**Authorised By**

| | | |
|---|---|---|
| Carmelina Valente | Chemist | Accreditation No 2013 |
| Richard Milich | Chemist | Accreditation No 2013 |

Final Report

- Indicates Not Requested

* Indicates NATA accreditation does not cover the performance of this service

Samples will be discarded after 30 days unless otherwise notified.



*The samples were not collected by Laboratory staff.*

# Appendix B
# Risk Assessment and ALARP Justification

| Line No. | Activity | Aspect | Hazard | Potential Impacts | Pre-Treatment L | Pre-Treatment C | Pre-Treatment Inherent Risk | Control Measure | Performance Standards | Post-Treatment L | Post-Treatment C | Post-Treatment Residual Risk | Performance Objectives | Measurement Criteria | ALARP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | Transport of machinery to Tank Farm and transport of tank offsite | Hydrocarbons | Spill / loss of containment of <100L hydrocarbons during transport and refuelling on site | Contamination of soil<br><br>Impacts to vegetation and flora from spills | 3 | 2 | 6 | Rey's Site Induction<br><br>Rey's Spill Response Procedure (RLS_EMS_PRO_011_Rev 0)<br><br>Waste Management Procedure<br><br>inGauge's Procedure for Refuelling in the Field | All personnel to have undertaken Rey's site induction which includes an understanding of spill management<br><br>A spill kit will be readily available in the service vehicle in accordance with Rey's Spill Response Procedure (RLS_EMS_PRO_011_Rev 0)<br><br>Rey will control, contain and clean-up of all hazardous spills in accordance with Rey's Spill Response Procedure | 2 | 2 | 4 | No loss of containment of hydrocarbons during transport. | Rey's Induction and Training Register demonstrates that all personnel and contractors involved in the care and maintenance and clean-up activities have completed the site induction which includes details relating to spill management as well as having undergone familiarisation/training with the Emergency Response Procedure for the site.<br><br>Waste register / records confirms that waste generated from spill events are segregated appropriately and disposed of by a suitably licenced contractor. | The risk of a spill event occurring during the transport of hydrocarbons is well understood, with the transport of small volumes of hydrocarbons commonplace for onshore oil and gas activities. As such, control measures for managing such a risk are also well understood and implemented across the industry.<br><br>Consequently, Rey believes ALARP decision context A applies and as such has applied good practice control measures in accordance with the process described in 4.2.2 Control Measures and ALARP. |
| 2 | Removal of oil/water from storage tank | Hydrocarbons/Waste | Spills or loss of containment of <50zL of hydrocarbons during maintenance activities | Soil contamination<br><br>Deaths of native vegetation from spills | 3 | 4 | 12 | Rey's Site Induction<br><br>Rey's Spill Response Procedure (RLS_EMS_PRO_011_Rev 0)<br><br>RLS_CMS_PRO_005 Corporate (CMS) Hazard and Risk Management Procedure<br><br>RLS_CMS_FRM_008 Corporate (CMS) Job Safety and Environment Analysis (JSEA) Form<br>Spill kits<br><br>Waste Management Procedure<br><br>inGauge's Procedure for Refuelling in the Field<br><br>If there is visual evidence of soil contamination, further investigation is warranted to determine whether remediation is required.<br><br>inGauge Contractor, certified engineers to undertake scopes of works | All personnel to have undertaken Rey's site induction which includes an understanding of spill management<br><br>RLS Spill Response Procedure (RLS_CMS_PRO_011) (refer to Section 5.1 of EP, 2019).<br>Rey will control, contain and clean-up of all hazardous spills in accordance with Rey's Spill Response Procedure.<br><br>All waste movement managed in accordance with inGauge's Waste Management Procedure that requires:<br>• Waste is segregated; and<br>• disposed of by an appropriately licenced contractor<br>RLS_CMS_PRO_006 Corporate (CMS) Emergency Response Procedure | 1 | 4 | 4 | No loss of crude oil/water during removal from the storage tank. | Records confirms that waste generated from spill events are segregated appropriately and disposed of by a suitably licenced contractor.<br>Site audits and inspection records confirm that all hoses and couplings are checked to ensure they are in good condition and not leaking during disposal activities. | The risk of a spill event occurring during maintenance activities is well understood, with the use of small volumes of hydrocarbons commonplace for onshore oil and gas maintenance activities. As such, control measures for managing such a risk are also well understood and implemented across the industry.<br>The risk of this type of spill event is considered to be low given the low number of vehicles, short duration of on-site activities and small volumes of hydrocarbons required to complete the activities within the scope of this Plan.<br>Consequently, Rey believes ALARP decision context A applies and as such has applied good practice control measures in accordance with the process described in 4.2.2 Control Measures and ALARP. |

360 environmental

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