




**Red Gully Processing Facility
Care and Maintenance Environment Plan
Summary
L18, L19, EP389 & PL96
EOC-EN-REP-0020**

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Distribution List

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Term Definitions and Abbreviations

Abbreviation	Definition
ALARP	As Low as Reasonably Practicable
C&M	Care and Maintenance
DBNGP	Dampier to Bunbury Natural Gas Pipeline
DMIRS	Department of Mines, Industry Regulation and Safety
EP	Environment Plan
EP Act	<i>Environmental Protection Act 1986</i>
EPBC Act	<i>Environment Protection and Biodiversity Act 1999</i>
EPO	Environmental Performance Objectives
EPS	Environmental Performance Standards
EP389	Exploration Permit 389
ERL	Energy Resources Limited
ERP	Emergency Response Plan
GDE	Groundwater Dependent Ecosystem
GGW1	Gingin West-1 Well
HDPE	High Density Polyethylene
HSE	Health, Safety and Environment
HSEQ	Health, Safety, Environment and Quality
IMR	Inspection, Maintenance and Repair
km	Kilometre
L	Litre
m	Metre
MRL	Mineral Resources Limited
OGUK	Oil and Gas United Kingdom
OSCP	Oil Spill Contingency Plan
PGER Act	<i>Petroleum and Geothermal Energy Resources Act 1967 (WA)</i>
PGER(E)R	Petroleum and Geothermal Energy Recourses (Environment) Regulations 2012
PL96	Pipeline Licence 96
PP	Petroleum Pipelines
PP Act	<i>Petroleum Pipelines Act 1969 (WA)</i>

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Abbreviation	Definition
PP(E)R	Petroleum Pipelines (Environment) Regulations 2012
RG1	Red Gully-1 Production Well
RGN1	Red Gully North-1 Production Well
RGPF	Red Gully Gas Processing Facility
WA	Western Australia
WMP	Well Management Plan

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1 Introduction

1.1 Background

Energy Resources Limited (ERL) is an Australian oil and gas company with onshore exploration assets in the Perth Basin of Western Australia. ERL is incorporated in New Zealand and is a registered foreign company in Australia. ERL is a subsidiary of Mineral Resources Limited (MRL).

In June 2018, ERL made the decision to move the Red Gully Processing Facility (RGPF) into Care and Maintenance. ERL are currently conducting further exploration activities within the region with the vision to return RGPF into an operating facility in the future.

1.2 Purpose

The Environment Plan (EP) has been written as a revision to the Red Gully Processing Facility (RGPF) C&M EP [EGO-HSE-RGPF-EP-001]. The EP was initially accepted by the Western Australian Department of Mines, Industry Regulation and Safety (DMIRS) in June 2018, however, has been revised to consolidate ERL's operational learnings over this time period, and update the management measures that are commensurate to the nature and scale of the activity, and the level of environmental risk posed by the activity.

The purpose of the EP is to provide an outline of the activities associated with the Red Gully facility and associated infrastructure along with a description of the environmental management measures to mitigate any potential environmental impacts and risks from those activities.

Under the *Petroleum and Geothermal Energy Resources Act 1967* (WA) (PGER Act) and *Petroleum Pipelines Act 1969* (WA) (PP Act), an EP is required to be prepared, approved and implemented for applicable activities. The objective of an EP is to reduce environmental risks and impacts of petroleum activities, to a level considered to be as low as reasonably practicable (ALARP).


The EP has been prepared in accordance with the DMIRS 'Guideline for the Development of Petroleum and Geothermal Environment Plans in Western Australia, November 2016'.

1.3 Instrument Holder and Nomination of Operator

ERL have permits in the Perth Basin including Production Licences L18 and L19, Petroleum Pipeline Licence 96 (PL96) and Exploration Permit 389 (EP389). The permits are owned and operated by ERL under the EP, as per Table 1-1.

Table 1-1 Details for Notification of Operator


Licence / Permit	Registered Holder / Operator	Percentage Ownership
L18	ERL	100 %
L19		
PL96		
EP389		

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In accordance with the Petroleum and Geothermal Energy Resources (Environment) Regulations 2012 (PGER(E)R), contact details for the Operator are included in Table 1-2.

Table 1-2 Nominated Contact Details

Contact Details	
Name	Paul Reynolds
Position / Company	ERL Operations Manager– Oil & Gas Facilities
Address	1 Sleat Rd, Applecross, Western Australia 6153
Telephone Number	0437 266 248
Email address	Paul.Reynolds@enres.com.au

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2 Description of the Activity

The scope of the EP is limited to the C&M of the Red Gully facility and associated infrastructure. Specifically, the Petroleum Activity is comprised of the following activities:

- Inspection
- Maintenance and Repair activities
- Downhole well operations
- Reinstatement
- Supporting operations

2.1 Inspection, Maintenance and Repair

Inspection, Maintenance, and Repair (IMR) of infrastructure may be undertaken to ensure that the integrity of the hydrocarbon system is maintained at or above acceptable standards while this EP is in force. IMR activities may occur at any time during this C&M phase.

2.1.1 Inspections

Inspections provide assurance that asset integrity is being maintained, and proactively identify maintenance or repair requirements. Inspections include:

- Routine Inspections
- Direct current voltage gradient (DCVG) survey
- Fire detection and alarm system check
- Cathodic Protection Survey

2.1.2 Maintenance and Repairs

Maintenance and minor repairs may include, but are not limited to:

- module/component change-out (including back testing of seals)
- equipment test and service (including fire extinguishers)
- infrastructure repair, which involves repairing any defective infrastructure that threaten its structural integrity
- pressurisation of Nitrogen gas blanket
- maintenance of cleared areas (fire-breaks etc.)
- tree valve maintenance (e.g. greasing valves, pressure monitoring).


2.2 Downhole Well Operations

Downhole well operations will be undertaken infrequently depending on the outcomes of surface integrity testing, or as directed by the in-force Well Management Plans (WMP).

The types of activities that may occur during well intervention include:

- Venting of gas

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- Circulation of well contents to portable storage
- Reinjection of well contents.

2.3 Reinstatement

ERL may reinstate certain areas within the Operational Area in the event that they are no longer required for current or future operations. Specifically, reinstatement activities may involve:

- removal of sheeting materials / waste
- removal of old equipment or out of service infrastructure off site
- backfilling of excavations
- recontouring of landform.

2.4 Supporting Operations

The supporting operations covered by the EP include camp facilities and vehicle operation.

Accommodation is used periodically for various maintenance programs and to support other ERL petroleum activities. However, for the majority of the time, the camp will remain un-used.

Supporting vehicles required for C&M activities may include:

- light vehicles for inspections and general access to sites
- earthmoving equipment (bulldozer, grader and / or roller) for civil works.


2.5 Operational Area

The Operational Area of the EP has been defined as the area in which the RGPF C&M activities take place, and includes all RGPF infrastructure as mentioned above, and the access track to RGN1 Well pad.

The RGPF is located approximately 17 km north of the town of Gingin. Primary access to the site is by Wannamal Road West and Brand Highway. The coordinates for Red Gully infrastructure are presented in Table 2-1.

Table 2-1: RGPF Project Coordinates

Location	Latitude	Longitude
RG1	-31.1804887233	115.8263270476
GGW1	-31.1806875696	115.8263665693
RGN1	-31.1448359434	115.8256231242
RGPF	-31.1794807695	115.8305684069
PL96 Connection to Dampier to Bunbury Natural Gas Pipeline (DBNGP)	-31.1897807106	115.8037117006


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2.6 Timeframes and Schedules

Table 2-2 outlines the current timeline for the activities covered by the EP.

Table 2-2 Timeframes and Schedule

Activity	Timeframe	Duration	Hours of Operation
Inspection, maintenance and repair	Ad hoc as required by Section 2-4 – Section 2.6 of the EP.	5 years	Daylight hours
Downhole Well Operations	None identified at the time of writing the EP	N/a	Daylight hours
Decommissioning	None identified at the time of writing the EP	N/a	Daylight hours
Site Reinstatement	None identified at the time of writing the EP	N/a	Daylight hours

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3 Description of the Environment

Environment	Summary
Climate	Gingin has a Mediterranean climate, with wet, mild winters and hot, dry summers
Soil	The Operational Area is located within the Swan Coastal Plain and the Dandaragan Plateau. Soils within the region are sandy.
Surface Water	The Operational Area is located on the border of two hydrographic catchments; the Gingin Brook sub-catchment of the Moore River hydrographic catchment and the Brockman River sub catchment of the Swan-Avon hydrographic catchment
Ground Water Systems	The Operational Area is situated within the Red Gully sub area of the Gingin Groundwater Area of the Northern Perth Basin The main regional aquifer beneath the Operational Area is the Yarragadee Formation.
Public Drinking Water Source Area	There are no Public Drinking Water Source Areas within the vicinity of the Operational Area
Acid Sulphate Soils	RGPF is located within an area where there is an extremely low probability of acid sulphate soils
Conservation Area	The Operational Area is not located within any conservation significant areas. There are conservation significant areas within the area (Figure 3-1).
Groundwater Dependent Ecosystem (GDE)	There are no GDEs present within the Operational Area.
Vegetation And Flora	The Operational Area is within an area that is historically cleared agricultural land with little remnant vegetation.
Weeds	Red Gully activities are located within private farmland which has an historical existing weed load.
Dieback	Not known to occur in the region.
Fauna	A number of native species (protected under the EPBC Act) are likely to occur or have habitat likely to occur within the region.
Aboriginal Heritage	No sites of importance have been identified within EP.
Native Title	The Operational Area is located within the Yued Aboriginal People registered Native Title Claimant on the National Native Title Tribunal register (registry number WC1997/071).
European Heritage	No World Heritage Sites or Commonwealth Heritage Sites occur within 10 km of the Operational Area.
Socio – Economic Environment	Red Gully C&M activities are situated within the Boonanarring agricultural region, Gingin, which contains a diverse range of agricultural uses. It is located on private farming land dedicated to sheep grazing.

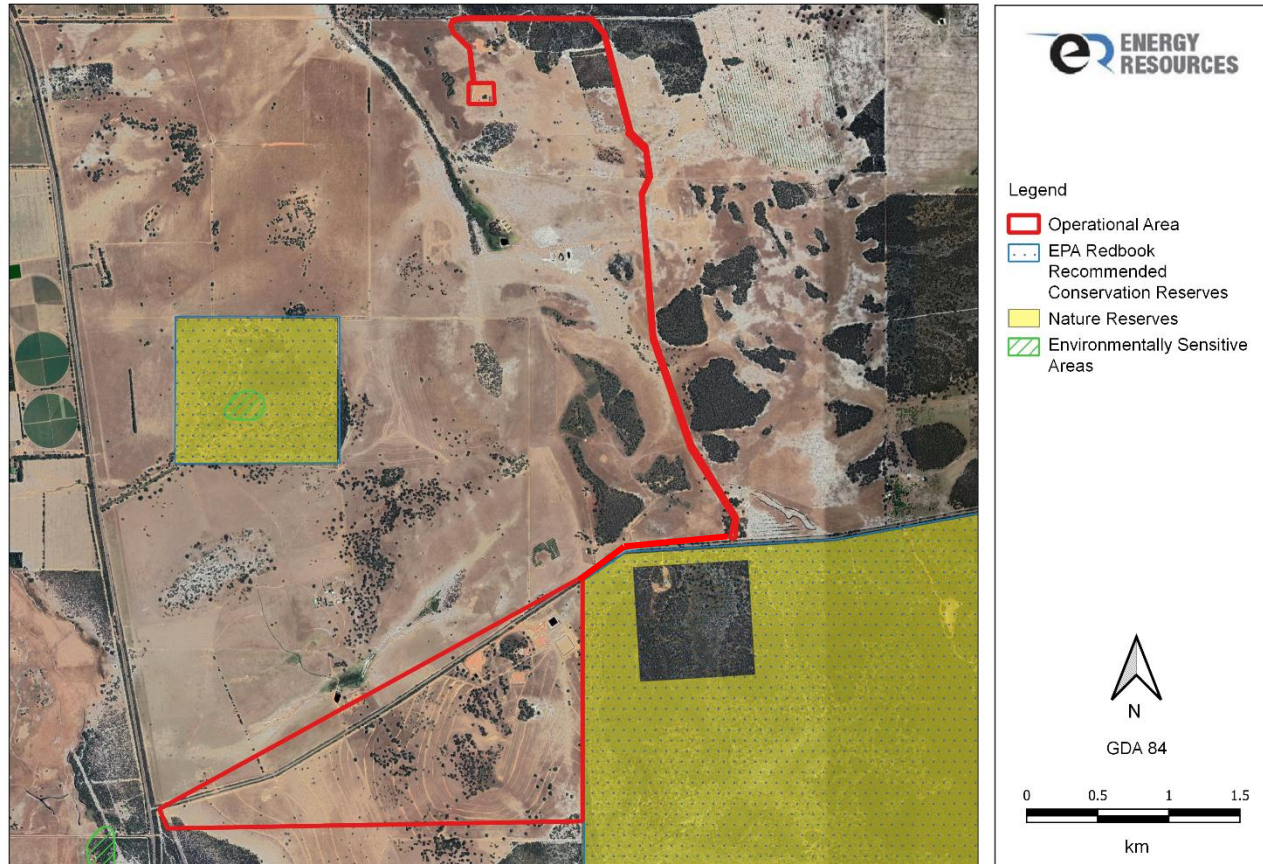



Figure 3-1 Conservation Significant Areas

4 Environmental Risk Assessment

The risk assessment for the EP was undertaken in accordance with ERL' Risk Management Standard using ERL' Risk Matrix. Hazards and their associated aspects and management / mitigation measures are detailed below in Table 4-1.

Table 4-1 Risk Assessment Outcome Summary

Aspect	Hazard	Management / Mitigation Measures
Physical Interaction – Soil and Vegetation	<ul style="list-style-type: none"> Spread/introduction of non-indigenous species (weeds, dieback pathogens etc.) Damage to heritage sites / artefacts Erosion associated with destabilisation of soil Unintentional clearing of native vegetation 	<ul style="list-style-type: none"> Hygiene management requirements Weed management requirements Heritage artefact identification procedure Fill materials assessed as low risk Erosion controls
Atmospheric Emissions	<ul style="list-style-type: none"> Disturbance to sensitive fauna or impacts to local landowners 	<ul style="list-style-type: none"> Emissions are monitored and reported Complaints management system Vehicles serviced regularly
Fire	<ul style="list-style-type: none"> Habitat and vegetation loss and/or fauna injury/fatality 	<ul style="list-style-type: none"> Bush Fires Regulations 1954 Firebreaks Emergency Response Plan (ERP)
Planned Release – Sewage and Greywater	<ul style="list-style-type: none"> Contamination of soil / groundwater 	<ul style="list-style-type: none"> Health (Treatment of Sewage and Disposal of Effluent and Liquid Waste) Regulations 1974
Physical Interaction – Fauna	<ul style="list-style-type: none"> Death or injury to fauna 	<ul style="list-style-type: none"> Speed limits Fauna exclusion and egress
Accidental Release – Solid and Liquid Waste	<ul style="list-style-type: none"> Environmental pollution and fauna attraction and / or injury or death (from ingestion) 	<ul style="list-style-type: none"> Appropriate rubbish bins and waste segregation Appropriately licensed waste contractor Waste register Housekeeping
Accidental Release – Hydrocarbon / Hazardous Materials	<ul style="list-style-type: none"> Contamination of soil / groundwater Reduction of air quality, resulting in disturbance to 	<ul style="list-style-type: none"> Evaporation Pond Design Evaporation pond integrity inspections Refuelling Procedure

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	sensitive fauna or impacts to local landowners	<ul style="list-style-type: none"> • AS1940 Bulk Hazardous and Hydrocarbon storage container requirements • Dangerous goods storage requirements • Solid (dry) chemical storage requirements • Oil Spill Contingency Plan (OSCP) • Spill kits • ERP • WMP
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5 Implementation Strategy

To meet the requirements of Regulation 15(1) of the PGER(E)R, Implementation Strategy for the EP, Section 7 of the EP describes the implementation strategy - the systems, practices, and procedures used to ensure that the environmental impacts and risks of the activities are continuously reduced to ALARP, and the EPOs and EPSS detailed in Section 5 of the EP are achieved.

5.1 Training and Competencies

Personnel who hold responsibilities relating to the implementation of the EP are hired on the basis of their particular qualifications, experience, and competency. The EP outlines training requirements to ensure that personnel associated with the activity are aware of their environmental responsibilities and have the appropriate competencies to undertake their role in compliance with the EP.

5.2 Reporting

ERL will report on the environmental performance of the activity in accordance with the legislation. Specifically, ERL will provide the following reports to DMIRS:

- Recordable Incident reports
- Quarterly emissions and discharges reports
- Annual Environmental Reports.

5.3 Management of Change

All significant project changes are subject to a management of change evaluation. ERL's Management of Change Standard (EOC-SAF-STD-0007) details how these changes are systematically managed to ensure adverse risks associated with the modification and introduction of new equipment and operational changes are minimised.

In conjunction with the Risk Management Procedure (Section 4.6 of the EP), this process is followed to document and assess the impact of changes to activities described in Section 2 of the EP. Changes are assessed to determine if there is potential for new or increased environmental impact or risk not already provided for in the EP. Specifically, these changes are considered with relation to Regulation 18 of the PGER(E)R which details specific triggers for resubmission of the EP.

If the identified changes do not trigger Regulation 18 of the PGER(E)R, the EP can be revised, and changes recorded within it without resubmission to DMIRS.

5.4 EP Review

Regulation 18 of the PGER(E)R requires that ERL submit a proposed revision of the accepted EP:

- Before the commencement of a new activity, or any significant modification, change of a new stage of an existing activity; and
- Before, or as soon as practicable after, the occurrence of any significant new environmental impact or risk, or significant increase in an existing environmental impact or risk which occurred or is to occur.

Additionally, Regulation 20 of PGER(E)R requires that ERL submit a proposed revision of the EP five years from the date when the EP is accepted by the Minister.

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6 Consultation

ERL conducts Stakeholder Engagement in accordance with the requirements of the PGER(E)R and DMIRS guidelines. Specifically, the following process is followed.

1. relevant stakeholders are identified
2. ERL provide sufficient information regarding the activities to relevant stakeholders to ensure meaningful engagement
3. objections and claims are identified and assessed for merit
4. response to objections and claims provided.

In accordance with Regulation 17 of PGER(E)R, ERL completed a scoping exercise to determine which authorities, persons and organisations were considered relevant for the activities covered under the EP. As the assets are in regional areas and distant from any town sites, the following stakeholders were identified and include:

- DMIRS
- DWER
- DFES
- Image Resources NL
- landowners of the properties where the assets are located, and adjacent to them
- local government (Shire of Gingin)
- Yued Native Title Group representatives.

ERL are continually liaising with the community in order to be cognizant of any other potential stakeholders that may need to be engaged for both current and future works with RGPF.

No objections or claims have been raised relevant to the activities covered in the EP.

6.1 Ongoing Consultation

ERL plan to continue direct consultation with relevant stakeholders over the duration of the EP. Given the nature of these activities, engagement is expected to be limited, and is undertaken when certain triggers or criteria are met. Stakeholder consultation triggers for the relevant stakeholders identified in this EP are listed in Table 6-1.

Table 6-1 Stakeholder Consultation Triggers

Stakeholder	Trigger
DMIRS	<ul style="list-style-type: none"> • Consultation for new or proposed activities • Scoping engagement for approval of new or proposed activities
DWER	<ul style="list-style-type: none"> • Scoping engagement for approval of new licence

Stakeholder	Trigger
	<ul style="list-style-type: none"> Notification where a pollution emergency has occurred Breach of licence conditions / specified limit
DFES	<ul style="list-style-type: none"> Notification where prescribed activities were conducted during a TFB.
Image Resources NL	<ul style="list-style-type: none"> Where activities have the potential impact Image Resources Tenements
Landowners of the properties where the assets are located, and adjacent to them	<ul style="list-style-type: none"> Notification of site works and activities
Local government (Shire of Gingin)	<ul style="list-style-type: none"> Scoping engagement for approval of new or proposed activities Notification where well intervention activities are intended to be conducted
Yued Native Title Group representatives	<ul style="list-style-type: none"> Disturbance of a previously undisturbed area within a Native Title Claimant Heritage sites / artefacts identified or damaged

As the RGPF is in C&M, with no new or proposed activities, the consultation triggered is limited to landowners.

All engagements that occur as a result of engagement triggers provided in Table 6-1 are recorded in ERL's INX system. An extract of these records, the stakeholder register, is provided in Table 6-2.

Table 6-2: Stakeholder Register

Stakeholder	Names / Contact	Nature of Consultation	Method of Communication	Date	ECO Contact	Notes and Resolution	Action Required	Status / Resolution
Red Gully Farm	Station Manager - Colin & Kay	Notification of Activity	Phone	27/07/2021	Paul Reynolds	Notification of site Works and Operations	Nil	Closed
Red Gully Farm	Station Manager - Colin & Kay	Notification of Activity	Phone	30/06/2021	Paul Reynolds	Notification of site Works and Operations	Nil	Closed
Red Gully Farm	Station Manager - Colin & Kay	Notification of Activity	Phone	26/05/2021	Paul Reynolds	Notification of site Works and Operations	Nil	Closed

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Stakeholder	Names / Contact	Nature of Consultation	Method of Communication	Date	ECO Contact	Notes and Resolution	Action Required	Status / Resolution
Red Gully Farm	Station Manager - Colin & Kay	Notification of Activity	Phone	28/04/2021	Paul Reynolds	Notification of site Works and Operations	Nil	Closed
Red Gully Farm	Station Manager - Colin & Kay	Notification of Activity	Phone	24/03/2021	Paul Reynolds	Notification of site Works and Operations	Nil	Closed
Red Gully Farm	Station Manager - Colin & Kay	Notification of Activity	Phone	24/02/2021	Paul Reynolds	Notification of site Works and Operations	Nil	Closed
Red Gully Farm	Station Manager - Colin & Kay	Notification of Activity	Phone	29/01/2021	Paul Reynolds	Notification of site Works and Operations	Nil	Closed
Red Gully Farm	Station Manager - Colin & Kay	Notification of Activity	Phone	24/06/2020	Paul Reynolds	Notification of site Works and Operations	Nil	Closed
Red Gully Farm	Station Manager - Colin & Kay	Notification of Activity	Phone	29/05/2020	Paul Reynolds	Notification of site Works and Operations	Nil	Closed
Red Gully Farm	Station Manager - Colin & Kay	Notification of Activity	Phone	29/04/2020	Paul Reynolds	Notification of site Works and Operations	Nil	Closed
Red Gully Farm	Station Manager - Colin & Kay	Notification of Activity	Phone	25/03/2020	Paul Reynolds	Notification of site Works and Operations	Nil	Closed
Red Gully Farm	Station Manager - Colin & Kay	Notification of Activity	Phone	26/02/2020	Paul Reynolds	Notification of site Works and Operations	Nil	Closed
Red Gully Farm	Station Manager	Notification of Activity	Phone	27/01/2020	Paul Reynolds	Notification of site	Nil	Closed

Stakeholder	Names / Contact	Nature of Consultation	Method of Communication	Date	ECO Contact	Notes and Resolution	Action Required	Status / Resolution
	- Colin & Kay					Works and Operations		
Red Gully Farm	Station Manager - Colin & Kay	Notification of Activity	Phone	11/12/2019	Paul Reynolds	Notification of site Works and Operations	Nil	Closed
Red Gully Farm	Station Manager - Colin & Kay	Notification of Activity	Phone	27/11/2019	Paul Reynolds	Notification of site Works and Operations	Nil	Closed
Red Gully Farm	Station Manager - Colin & Kay	Notification of Activity	Phone	30/10/2019	Paul Reynolds	Notification of site Works and Operations	Nil	Closed
Red Gully Farm	Station Manager - Colin & Kay	Notification of Activity	Phone	25/09/2019	Paul Reynolds	Notification of site Works and Operations	Nil	Closed
Red Gully Farm	Station Manager - Colin & Kay	Notification of Activity	Phone	28/08/2019	Paul Reynolds	Notification of site Works and Operations	Nil	Closed
Red Gully Farm	Station Manager - Colin & Kay	Notification of Activity	Phone	27/07/2019	Paul Reynolds	Notification of site Works and Operations	Nil	Closed