

From: s. 47F(1)
To: s. 22(1)(a)(ii) s. 47F(1)
Subject: RE: Browse to NWS Project (EPBC 2018/8319, EPA 2191): draft Environmental Scoping Document - for review [SEC=UNCLASSIFIED]
Date: Thursday, 21 February 2019 3:54:23 PM
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.jpg](#)
[image005.jpg](#)
[image006.jpg](#)

Hi s. 22(1)(a)(ii)

As discussed we understand that the delegate is likely to add national heritage as a controlling provision for Browse due to the potential for air emissions associated with NWS processing Browse gas to impact petroglyphs on the Burrup.

Similar to greenhouse, we view this as unnecessary and setting an unpredictable precedent for a number of reasons:

- Browse and NWS are related, but not a single action – the ownership differs and Browse does not have operational control over NWS emissions. The subsequent value/efficacy of assigning conditions to the Browse Joint Venture is therefore questionable.
- It may lead to the above issue being assessed in two places (the Browse EIS and NWS PER) which is likely to confuse stakeholders and hinder a holistic assessment of the issue. Due to the above, the Browse EIS would need to be silent on management and mitigation and any assessment would be dependent on information provided by the NWSJV (or would need to cross-reference the same).
- Emissions associated with the NWS processing Browse gas will be assessed under the NWS approval process.
- At Browse RFSU, approximately 40% of NWS capacity will be occupied by Browse. As the residual 60% declines, NWS is likely to receive gas from other proponents in the timeframe stipulated in their referral. As such their assessment needs to “stand alone”
- The assessment processes are running in parallel and as discussed we will be seeking to align or at least overlap public comment periods. This ensures that stakeholders have the opportunity to view and comment on the issue if it is “signposted” from the Browse EIS
- If you follow similar logic – if domestic gas from a new offshore gas facility will be used at a downstream petrochemical facility, then that offshore gas facility would need to evaluate the localised impacts of that petrochemical facility

Whilst we appreciate that indirect impacts require consideration, Browse understands that the NWS is progressing opportunities to open up the Karratha Gas Plant to potential third party tolling as ullage becomes available. Therefore it is not possible to say that Browse, as a potential customer, is the material and substantial cause of the impacts or the consequences of the proposed NWS extension. Onshore processing is also one option but not necessarily the only option available to potential offshore developments.

We understand that this is ultimately a decision for the Minister/delegate however, and look forward to receiving the level of assessment decision tomorrow.

If national heritage is included as a controlling provision for Browse, we would appreciate discussing scoping and challenges with you.

Thanks

s. 47F(1)

Environment Manager | Developments HSEQ



Woodside Energy Ltd.
Mia Yellagonga
Karlak, 11 Mount Street
Perth WA 6000
Australia

T: +61 s. 47F(1)
E: s. 47F(1)@woodside.com.au
www.woodside.com.au
□ □ □ □ □

From: s. 22(1)(a)(ii) [mailto:s. 22(1)(a)(ii)@environment.gov.au]

Sent: Thursday, 21 February 2019 10:13 AM

To: s. 47F(1)

Cc: s. 47F(1) ; Declan O'Connor-Cox

Subject: RE: Browse to NWS Project (EPBC 2018/8319, EPA 2191): draft Environmental Scoping Document - for

review [SEC=UNCLASSIFIED]

Hi s. 47F(1)

I tried to call but you did not answer so I email instead.

As indicated in my previous email, there is a difficulty here in that, with the delay in making a controlled action decision, we continue to be unable to provide your draft ESD document to NOPSEMA. The procurement paperwork needs to be signed off first, and that can't happen until there's a controlled action decision.

A meeting on the 27th Feb, when NOPSEMA hasn't received your draft ESD yet and they will be conducting the assessment for this Department, and you haven't (can't) pay your stage 1 invoice yet, doesn't sound like it will work.

We therefore need to discuss options for getting an approval here of what is known here the EIS Guidelines made under s.102 of the EPBC Act (it will be the same document known as the ESD in the state process).

- I note s.102 of the Act does not require the Minister to seek public comment on the EIS Guidelines, so options do exist.
- That said, last time (EPBC 2013/7079), the delegate did require public consultation on the EIS Guidelines, so there is now some uncertainty about the Department's capacity to meet the timeframes/schedule you have set out.

I will separately try to call s. 22(1)(a)(ii)/WA DWER to try to find out when WA EPA need the ESD 'finalised' ready for presentation to/approval by the EPA Board.

- To continue consideration of this matter, that is a critical end date we need to know asap.
- If you are certain the date of 18 March, shown below as the date for 'finalise ESD', is the date DWER/EPA need the ESD by to present to EPA Board on 21 March, grateful if you would please confirm that and explain (or provide evidence for) how you know that.
- If it is a date you are not certain of, I will keep trying as stated to contact s. 22(1)(a)(ii)

When you can, I would like to speak to you and potentially s. 47F(1) on (this if needed plus) a separate matter. Do you (or both of you) have any time today to discuss a matter please?

Thank you

s. 22(1)(a)(ii)

Acting Director

Major Projects West Section

Environment Standards Division

Department of the Environment and Energy

s. 22(1)(a)(ii)@environment.gov.au | www.environment.gov.au |

Ph: (02) 6274 s. 22(1)(a) PO Box 787, CANBERRA ACT 2601

From: s. 47F(1) [mailto:s. 47F(1)@woodside.com.au]

Sent: Thursday, 21 February 2019 12:32 PM

To: s. 22(1)(a)(ii)<s. 22(1)(a)(ii)@dwer.wa.gov.au>

Cc: s. 22(1)(a)(ii)<s. 22(1)(a)(ii)@environment.gov.au>; s. 47F(1)@woodside.com.au

Subject: Re: Browse to NWS Project (EPBC 2018/8319, EPA 2191): draft Environmental Scoping Document - for review

Thanks s. 22(1)(a)(ii) and s. 22(1)(a)(ii) for getting back to me.

s. 22(1)(a)(ii) I hope the move goes smoothly next week.

Would Wednesday, 27 February 10 - 12 suit DoEE, EPA and NOPSEMA to run through gov ESD feedback?

Just looking forward, do the following timeframes work?

* 27 February: Meeting with DoEE, EPA and NOPSEMA to discuss Gov comments on ESD and finalise ESD

* 28 February: Woodside issue final ESD to DoEE and EPA

* 4 - 15 March: DoEE 10 day ESD public comment period

* 18 March: finalise ESD

* 21 March: WA EPA board meeting to approve ESD

Thanks, s. 47F(1).

On 21 Feb 2019, at 9:10 am, s. 22(1)(a)(ii)<s. 22(1)(a)(ii)@dwer.wa.gov.au> wrote:

Hi s. 47F(1),

Early next week could be problematic as we are moving offices this weekend so Monday is not a good day to organise meetings as we need to make sure everything is working in the building, and I am out on a site visit on the 26 Feb. Wednesday 27 in the morning after 10'oclock is a possibility.

Kind Regards

s. 22(1)(a)(ii)

s. 22(1)(a)(ii)

A/Manager
EIA North

Department of Water and Environmental Regulation

Level 4, The Atrium, 168 St Georges Terrace, Perth

Locked Bag 33, Cloisters Square, PERTH WA 6850

Direct: 08 6364 s. 47F(1) / Reception: 08 6364 6534

Email: **s. 22(1)(a)(ii)**[@dwer.wa.gov.au](mailto:s.22(1)(a)(ii)@dwer.wa.gov.au) / www.epa.wa.gov.au / www.dwer.wa.gov.au

Twitter: @DWER_WA / @EPA_WA

From: **s. 47F(1)** [[mailto:s. 47F\(1\)](mailto:s.47F(1)@woodside.com.au)] [@woodside.com.au](mailto:s.47F(1)@woodside.com.au)]

Sent: Wednesday, 20 February 2019 5:32 PM

To: **s. 22(1)(a)(ii)**<**s. 22(1)(a)(ii)**[@dwer.wa.gov.au](mailto:s.22(1)(a)(ii)@dwer.wa.gov.au)>

Cc: **s. 22(1)(a)(ii)** <**s. 22(1)(a)(ii)**[@environment.gov.au](mailto:s.22(1)(a)(ii)@environment.gov.au)>

Subject: FW: Browse to NWS Project (EPBC 2018/8319, EPA 2191): draft Environmental Scoping Document - for review

Hi s. 22(1)(a)(ii),

Apologies I meant to include you on this email.

Kind regards, **s. 47F(1)**

From: **s. 47F(1)**

Sent: Wednesday, 20 February 2019 2:01 PM

To: '**s. 22(1)(a)(ii)**' <**s. 22(1)(a)(ii)**[@environment.gov.au](mailto:s.22(1)(a)(ii)@environment.gov.au)>; **s. 47F(1)**

<**s. 47F(1)** [@woodside.com.au](mailto:s.47F(1)@woodside.com.au)>

Cc: **s. 47F(1)** . <**s. 47F(1)**[@woodside.com.au](mailto:s.47F(1)@woodside.com.au)>; **s. 47F(1)**

<**s. 47F(1)** [@woodside.com.au](mailto:s.47F(1)@woodside.com.au)>; **s. 47F(1)**

<**s. 47F(1)** [@woodside.com.au](mailto:s.47F(1)@woodside.com.au)>

Subject: FW: Browse to NWS Project (EPBC 2018/8319, EPA 2191): draft Environmental Scoping Document - for review

Hi s. 22(1)(a)(ii) and s. 22(1)(a)(ii)

I hope you are both well.

We understand that the Commonwealth will be making a decision on the Browse to NWS Project referral (EPBC/8319) this week.

To ensure the final ESD can be tabled at the 21 March EPA board meeting and allowing for the 10 day DoEE public comment period, would DoEE and EPA be available to meet (tele conference or in person) early next week (25 or 26 February) to run through DoEE and EPA comments on the attached?

Many thanks for your assistance with this.

Kind regards, **s. 47F(1)**

From: **s. 47F(1)**

Sent: Thursday, 7 February 2019 5:16 PM

To: **s. 22(1)(a)(ii)**[@environment.gov.au](mailto:s.22(1)(a)(ii)@environment.gov.au); **s. 22(1)(a)(ii)**[@dwer.wa.gov.au](mailto:s.22(1)(a)(ii)@dwer.wa.gov.au)

Cc: **s. 47F(1)** . <**s. 47F(1)**[@woodside.com.au](mailto:s.47F(1)@woodside.com.au)>; **s. 47F(1)**

<**s. 47F(1)** [@woodside.com.au](mailto:s.47F(1)@woodside.com.au)>; **s. 47F(1)** <**s. 47F(1)** [@woodside.com.au](mailto:s.47F(1)@woodside.com.au)>

Subject: Browse to NWS Project (EPBC 2018/8319, EPA 2191): draft Environmental Scoping Document - for review

Hi s. 22(1)(a)(ii) and s. 22(1)(a)(ii)

Thank you for meeting with us last week and providing us with the opportunity to discuss the Browse to NWS Project Environmental Scoping Document (ESD) structure, content and workplan.

As discussed, Woodside has prepared the draft Browse to NWS Project ESD and attached it for your review/comment.

We note the Commonwealth decision on the Browse to NWS Project Referral (EPBC 2018/8319) is outstanding.

The ESD has been prepared based on the expectation that the Browse to NWS Project will be assessed at an Environmental Impact Statement level, and relevant MNES and controlling provisions will be consistent with Browse FLNG (based on advise provided 31/01/2019).

The ESD has been prepared in accordance with the EPA determination on Browse to NWS Project on the 22 January 2019 (EPA 2191 - PER level of assessment and requirement for a ESD and Environmental Review Document) and the EPA ESD template.

Woodside is seeking for the ESD to be approved by the Commonwealth and State EPA by the end of March 2019, noting the following key dates:

- EPA Board Meeting on the 21 March 2019, with the March date allowing for Commonwealth 10 day public comment period.
- June 2019 submission date for the Browse to NWS Project Environmental Impact Statement/ Environmental Review Document
- Environmental approval by April 2020 (required prior to Retention Lease expiry)

Please note, we are able to meet with both DOEE and EPA to discuss the document and work through comments.

We look forward to hearing from you.

Kind regards,

s. 47F(1)

s. 47F(1)

Environment Adviser | Developments Environment

Woodside Energy Ltd.

Mia Yellagonga

Karlak, 11 Mount Street

Perth WA 6000

Australia

T: (+61) s. 47F(1)

M: (+61) s. 47F(1)

E: s. 47F(1) [@woodside.com.au](mailto:s.47f(1)@woodside.com.au)

www.woodside.com.au

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