



Report and recommendations of the Environmental Protection Authority



Gas Pipeline from Griffin Oilfield
to Mainland Facility near Onslow
– inquiry under section 46 of the
Environmental Protection Act 1986
to amend Ministerial Statement 308

DBP Development Group Nominees Pty Limited

Report 1676

May 2020

Inquiry under section 46 of the *Environmental Protection Act 1986*

The Minister for Environment has requested that the Environmental Protection Authority (EPA) inquire into and report on the matter of whether the condition 1, commitment 39 of Ministerial Statement 308 relating to the Gas Pipeline from Griffin Oilfield to Mainland Facility near Onslow should be changed.

Section 46(6) of the *Environmental Protection Act 1986* requires the EPA to prepare a report that includes:

- (a) a recommendation on whether or not the implementation conditions to which the inquiry relates, or any of them, should be changed
- (b) any other recommendations that it thinks appropriate.

The following is the EPA's report to the Minister pursuant to s. 46(6) of the *Environmental Protection Act 1986*.



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Chairman

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1. The proposal

DBP Development Group Nominees Pty Limited (the proponent) operated the Gas Pipeline from Griffin Oilfield to Mainland Facility near Onslow. The proposal included a submarine (offshore) pipeline, an onshore pipeline to the gas treatment plant, the gas treatment plant, and a small LPG pipeline to a loading facility near Onslow main road.

The Environmental Protection Authority (EPA) assessed the proposal at the level of Consultative Environmental Review, publishing its report (Bulletin 674) in 1993. In this report, the EPA considered that the main environmental issues relating to the proposal were:

- environmental sensitivity of the preferred route for the pipeline
- impacts on the prawn fishery
- rehabilitation of the coastal dunes
- impacts on existing land uses.

In applying the *Statement of Environmental Principles, Factors and Objectives* (EPA 2020b) these factors are now represented by:

- Benthic Communities and Habitats
- Marine Environmental Quality
- Social Surroundings
- Marine Fauna
- Flora and Vegetation
- Coastal Processes
- Landforms (Dunes).

The EPA concluded in Bulletin 674, that the proposal can be managed to meet the EPA's objectives would be achieved, provided there was satisfactory implementation by the proponent of the EPA's recommended conditions.

The then Minister for Environment approved the proposal for implementation, subject to the implementation conditions of Ministerial Statement 308 (17 March 1993).

Previously approved changes to conditions

There have been no changes to the proposal or the implementation of conditions under the *Environmental Protection Act 1986* since the publication of Ministerial Statement 308.

2. Requested changes to conditions

The proponent is installing new compressors at the old Griffin Oilfield to mainland Facility location as part of the Tubridgi Gas Storage Project under Ministerial Statement 308 and has completed noise modelling to assess the predicted noise outputs against the requirements of the statement and occupational health and safety guidelines. The proponent is seeking a change to a condition to Ministerial Statement 308 to remove a commitment to limit noise levels at 1 m from all ground level equipment. The commitment to meet noise level 100 m from the boundary will be retained.

As a result, the proponent requested the following change to the implementation conditions of Ministerial Statement 308:

- change commitment 39 in condition 1 from:

Under normal operating condition noise levels will be kept below 85 dB(A) at 1m from all ground level equipment, and below 75 dB(A) at 100 m from the plant boundary. Noise monitoring will be undertaken prior to construction during construction and during operation of the gas plant.

to:

Under normal operating condition noise levels will be kept below 75 dB(A) at 100 m from the plant boundary. Noise monitoring will be undertaken prior to construction during construction and during operation of the gas plant.

In response to the proponent's request, the Minister for Environment requested that the EPA inquire into and report on the matter of changing the implementation condition of Ministerial Statements 308 for the proposal. This report satisfies the requirements of the EPA's inquiry.

3. Inquiry into changing conditions

The EPA has discretion as to how it conducts this inquiry. In determining the extent and nature of this inquiry, the EPA had regard to information such as:

- the currency of its original assessment (Bulletin 674)
- Ministerial Statement 308
- information provided by the proponent
- advice from relevant decision-making authorities
- any new information regarding the proposal's potential impacts on the environment.

EPA procedures

The EPA followed the procedures in the *Environmental Impact Assessment (Part IV Divisions 1 and 2) Administrative Procedures 2016* (State of Western Australia 2016) and the *Environmental Impact Assessment (Part IV Divisions 1 and 2) Procedures Manual* (EPA 2020a).

4. Inquiry findings

The EPA considered that Social Surroundings is the key environmental factor relevant to the change to condition.

4.1 Social Surroundings – Amenity

The EPA's environmental objective for this factor is *to protect social surroundings from significant harm*.

Conclusions from Bulletin 674

Bulletin 674 identified noise as a particular concern. Subsequently, conditions 1 and 7 and associated commitment 39 were included in Ministerial Statement 308. The EPA assessment identified the potential effects of noise and dust caused by the construction activities, noise and gaseous waste discharges from the gas plant.

The issues raised in the nine public submissions during the EPA's assessment of the proposal were adequately addressed by the proponent's response to issues and their environmental management commitments. The EPA concluded that the proposal can be managed to meet the objectives for the factor, if the following recommendations were applied:

- The EPA concludes that the proposal to pipe gas ashore from the Griffin oilfield is environmentally acceptable subject to the proponent's environmental management commitments and the recommendations in the EPA report 674. In reaching this conclusion, the EPA identified the main environmental issues are:
 - environmental sensitivity of the preferred route for the pipeline
 - impacts on the prawn fishery
 - rehabilitation of the coastal dunes
 - impacts on existing land uses.
- The EPA considered that these and other issues have been adequately addressed by the proponent's environmental management commitments and the recommendations in the EPA report 674. The EPA recommends that the proposal could proceed subject to the proponent's commitments and the recommendations being applied.

In March 1993, Ministerial Statement 308 was approved. The proponent made a number of environmental management commitments under condition 1 of Ministerial Statement 308, to protect the environment.

Commitment 39 states:

Gas Plant

Under normal operating condition noise levels will be kept below 85 dB(A) at 1 m from all ground level equipment, and below 75 dB(A) at 100 m from the plant boundary. Noise monitoring will be undertaken prior to construction, during construction and during operation of the gas plant.

In Bulletin 674, the EPA considered the distance of the gas treatment plant situated five kilometres from the Urala Station homestead. At this distance the EPA considered that the potential effects on the Urala Station from dust or noise caused by construction activities and noise or gaseous waste discharges from the gas treatment plant, could be managed to be environmentally insignificant.

Bulletin 674 stated that, having particular regard to recommended condition 1 to ensure environmental management is implemented to minimise impacts to social surroundings, it was the EPA's opinion that the proposal could be managed to meet the EPA's environmental objective for this factor.

Assessment of the proposed change to conditions

The EPA considers that the *Environmental Factor Guideline – Social Surroundings* (EPA 2016) is the current environmental policy and guidance relevant to its assessment of the proposal.

Since the EPA published its report in 1993 (Bulletin 674), the proponent has undertaken noise modelling to assess the predicted noise outputs against the requirements of Ministerial Statement 308 and occupational health and safety guidelines in Western Australia, to support the installation of new compressors at the old Griffin Export Facility location as part of the Turbridgi Gas Storage Project under Ministerial Statement 308.

The proponent has advised that the 85 dB(A) noise contour for the project extends over most of the compressor and generator footprint, which is considered work place noise and regulated by the Department of Mines, Industry Regulation and Safety under the *Occupational Safety and Health Act 1984*. The predicated noise levels at 100 metres from the site boundary are estimated to be below 75 dB(A).

The proponent is seeking to amend their commitment to remove the workplace noise limits, while maintaining the broader environmental offsite noise limit of 75 dB(A) at 100 metres from the boundary.

In addition, the Urala Homestead is within 5 kilometres of the facility and was the nearest receptor in the original EPA assessment. The proponent is now the holder of the Urala Pastoral Station, and has advised that there are no personnel on site. The proponent's noise modelling included Urala homestead and noise levels due to operation at the facility were predicted to be acceptable at less than 35 dB(A).

The proponent is not proposing any changes to the proposal that would change the potential impacts to social surroundings, or any other changes to the conditions of Ministerial Statement 308 relating to the management of impacts to social surroundings. The EPA is satisfied that its objectives for this factor can be met, and the potential impacts of the proposal can be managed through existing implementation of condition 1.

5. Conclusions and recommendations

Change to condition 1, commitment 39

Condition 1 of Ministerial Statement 308 requires the proponent to fulfil a number of commitments. The proponent has requested a change to commitment 39.

Commitment 39 currently reads:

Under normal operating condition noise levels will be kept below 85 dB(A) at 1 m from all ground level equipment, and below 75 dB(A) at 100 m from the plant boundary. Noise monitoring will be undertaken prior to construction, during construction and during operation of the gas plant.

The EPA considers it is appropriate to remove the commitment to meet 85 dB(A) at 1 m from all ground level equipment and be replaced with the revised commitment:

Under normal operating condition noise levels will be kept below 75 dB(A) at 100 metres from the plant boundary. Noise monitoring will be undertaken prior to construction, during construction and during operation of the gas plant.

Conclusions

In relation to the environmental factors, and considering the information provided by the proponent and relevant EPA policies and guidelines, the EPA concludes that:

- there are no changes to the proposal
- there is no significant new or additional information that changes the conclusions reached by the EPA under any of the relevant environmental factors since the proposal was assessed by the EPA in Bulletin 674 (January 1993)
- no new significant environmental factors have arisen since its assessment of the proposal
- the impacts to the key environmental factors are considered manageable, based on the requirements of existing conditions, and the imposition of the attached recommended conditions.

Recommendations

Having inquired into this matter, the EPA submits the following recommendations to the Minister for Environment under s. 46 of the *Environmental Protection Act 1986*:

1. While retaining the environmental requirements of the original conditions of Ministerial Statement 308, it is appropriate to change commitment 39 of implementation condition 1 and replace with a new commitment.
2. After complying with s. 46(8) of the *Environmental Protection Act 1986*, the Minister may issue a statement of decision to change commitment 39 of implementation condition 1 of Ministerial Statement 308 in the manner provided for in the attached recommended statement (Appendix 1).

References

EPA 1993, *Gas Pipeline from Griffin Oilfield to Mainland Facility, near Onslow, Bulletin 674*, Environmental Protection Authority, Perth, WA.

EPA 2016, *Environmental Factor Guideline – Social Surroundings*, Environmental Protection Authority, Perth, WA.

EPA 2020a, *Environmental Impact Assessment (Part IV Divisions 1 and 2) Procedures Manual*, Environmental Protection Authority, Perth, WA.

EPA 2020b, *Statement of Environmental Principles, Factors and Objectives*, Environmental Protection Authority, Perth, WA.

State of Western Australia 2016 Western Australia Government Gazette, No. 223, 13 December 2016.

SVT 2017, *Turbridgi Gas Storage Plant Noise Study*, SVT Engineering Consultants, Perth, WA.

Appendix 1: Identified Decision-Making Authorities and recommended environmental conditions

Identified Decision-Making Authorities

The following decision-making authorities have been identified for the purposes of s. 45 as applied by s. 46(8) of the *Environmental Protection Act 1986*:

| Decision-Making Authority | Legislation (and Approval) |
|---|---|
| 1. Minister for Environment | <i>Biodiversity Conservation Act 2016</i> (Taking of protected flora and fauna) |
| 2. Minister for Mines and Petroleum | <i>Petroleum Pipelines Act 1969</i> <i>Petroleum and Geothermal Energy Resources Act 1967</i> <i>Petroleum (Submerged Lands) Act 1982</i> |
| 3. Minister for Aboriginal Affairs | <i>Aboriginal Heritage Act 1972</i> (Section 18 approval) |
| 4. Minister for Lands | <i>Land Administration Act 1997</i> |
| 5. Chief Executive Officer, Department of Water and Environmental Regulation | <i>Environmental Protection Act 1986</i> (Works approval and licence) |
| 6. Chief Dangerous Goods Officer, Department of Mines, Industry Regulation and Safety | <i>Dangerous Goods Safety Act 2004</i> (Dangerous goods licence) |
| 7. Shire of Ashburton | <i>Building Act 2011</i> <i>Planning and Development Act 2005</i> |

Note: In this instance, agreement is only required with DMAs 1-4 since these DMAs are a Ministers.

Recommended Environmental Conditions

STATEMENT TO CHANGE THE IMPLEMENTATION CONDITIONS APPLYING TO A PROPOSAL

(Section 46 of the *Environmental Protection Act 1986*)

GAS PIPELINE FROM GRIFFIN OILFIELD TO MAINLAND FACILITY NEAR ONSLOW

Proposal: The Griffin gas pipeline development includes the submarine pipeline, the on-shore pipeline to the gas treatment plant and the LPG pipeline.

Proponent: DBP Development Group Nominees Pty Limited
Australian Company Number 153 397 632

Proponent Address: Level 6, 12-14 The Esplanade
Perth WA 6000

Report of the Environmental Protection Authority: 1676

Previous Report relating to this Proposal: 674

Previous Statement relating to this Proposal: 308

The implementation of the proposal to which the above report of the Environmental Protection Authority relates is subject to the conditions and procedures contained in Ministerial Statement No. 308, as amended by the following:

Commitment 39 of Condition 1 is deleted and replaced with:

39. Under normal operating condition noise levels will be kept below 75 dB(A) at 100 metres from the plant boundary. Noise monitoring will be undertaken prior to construction, during construction and during operation of the gas plant.