



# **Pluto North West Shelf Interconnector Pipeline**



## **2022 Annual Compliance Report (Ministerial Statement 1117)**



**E-REP-082**



**Revision 0  
February 2023**



Rev	Date	Description
0.1	30/01/2023	Initial draft for internal review
0	20/2/2023	Initial Submission

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Approved	Chief Executive Officer	Craig de Laine

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## 1. INTRODUCTION

This report addresses the status and compliance of the Pluto North West Shelf Interconnector Pipeline (PNI) with the conditions in Ministerial Statement 1117. This report has been prepared for the purpose of meeting the requirements of conditions 4–1 to 4–6 of the Statement, which is to submit annual compliance reports in line with the approved Compliance Assessment Plan. This report covers the reporting period from 21 November 2021 to 20 November 2022.

This report shall be in line with the approved Compliance Assessment Plan which was approved by the Department of Water and Environmental Regulation (DWER) on 2 June 2020.

### 1.1 Project Background

The PNI project involves the construction of 3.3 km of natural gas pipeline in the industrialised section of the Burrup Peninsula in the Pilbara Region of Western Australia (WA).

The project commences at the Pluto Compressor Station (PCS) within the Dampier Bunbury Natural Gas Pipeline (DBNGP) corridor and connects the Pluto Liquefied Natural Gas (LNG) Plant with the Karratha Gas Plant (KGP).

The proposal for the PNI was approved for implementation under Part IV of the *Environmental Protection Act 1986* (EP Act) with the issue of Statement No. 1117 (the Statement) on 21 November 2019. AGID is the Proponent and Nominated Operator of the PNI project.

The Statement requires submission of an annual compliance report to address the status and compliance of the PNI project with Statement conditions and key actions in accordance with the annual compliance reporting requirements of conditions 4–1 to 4–6 of the Statement.

### 1.2 The Proposal

Table 1 presents the key characteristics of the proposal as outlined in Table 2 of Schedule 1 of MS1117.

**Table 1: Key characteristics of the PNI Project**

Element	Proposal	Authorised Extent
Pipeline construction and associated infrastructure	Figure 1 (of MS1117)	Clearing of no more than 10.69 ha of which 3.26ha is within the KGP Lease and Buffer Zone Lease and 7.43 ha within DBNGP Corridor and Dampier Facilities Area.

### 1.3 Environmental approval to implement the project

AGID was granted environmental approval for the PNI proposal under Part IV of the EP Act. The Minister for Environment approved the proposal on 21 November 2019 with the release of Statement No. 1117, which includes environmental conditions under which the proposal is to be implemented.

The required management plans included for the project are the Construction Environmental Management Plan (CEMP) and the Cultural Heritage Management Plan (CHMP). A Department of Mines, Industry Regulation and Safety (DMIRS) Environment Plan was also required as part of the pipeline licence process.

The initial approved plans (CEMP and CHMP) remain the current versions to be implemented.

## 2. SCOPE

The scope of this report includes all works conducted under MS 1117 during the period 21 November 2021 to 20 November 2022 (the reporting period).

The scope does not include the use of existing facilities for laydown, offices, crib rooms or third party accommodation.

## 3. CURRENT STATUS

The PNI pipeline was in operational status during the reporting period. This included final commissioning to allow the introduction of natural gas. Operations commenced on 19 March 2022.

The works conducted in the reporting period were:

- Final commissioning and completion of punch list items
- Introduction of hydrocarbons
- Final Leak Test
- Cathodic Protection Survey (annual)
- Accuracy Verification Test (AVT) and gas sampling
- Aerial Surveillance

Works by Woodside were also conducted adjacent to the pipeline to install cabling and lighting in the Karratha Gas Plant Boundary.

## 4. COMPLIANCE

The report has been prepared by AGID for submission to the Chief Executive Officer (CEO) of the DWER to meet the requirements of condition 4–1 of Statement No. 1117 and the Compliance Assessment Plan.

### 4.1 Methodology

The audit was conducted in November 2022.

The required reporting includes “whether the proponent has complied with each condition and procedure contained within the statement” and “conformed with each key action”. This section describes how compliance with each condition and conformance with key actions has been audited and reported.

#### *Compliance with Statement No. 1117*

An audit of compliance with the conditions and procedures of the Statement was conducted and a compliance status rating was applied in accordance with terminology described in Section 3.3. The full audit is presented in Section 5.1.

There were no potential or actual non-compliances identified during the audit.

### 4.2 Audit terminology

The ‘Status’ field of the audit table (refer to Section 5) describes the implementation of the action and compliance with the condition, procedure or commitment. Although the CEO of the Office of Environmental Protection Authority (OEPA) makes the final determination of compliance, it is necessary to update this field each reporting period, as the project progresses. The OEPA (2012a, 2012b, 2012c and 2012d) has prepared updated guidance related to the preparation of compliance audits, including generic expressions that are used to identify the status of each item (Table 2).

**Table 2: Action implementation status (Source: adapted from DWER Statement of Compliance)**

Status	Description
Compliant (Conformant)	Implementation of the proposal has been carried out in accordance with requirements of the audit. (Conformant – as above in relation to actions of management plans / programmes)
Completed	A requirement with a finite period of application has been satisfactorily completed.
Not required at this stage	The requirements of the audit element were not triggered during the reporting period.
Potentially non-compliant (Potentially non-conformant)	Possible or likely failure to meet the requirements of the audit element. (Potentially non-conformant – as above in relation to actions of management plans / programmes)
In process	Where an audit element requires a management or monitoring plan be submitted to the OEPA or another government agency for approval, that submission has been made and no further information or changes have been requested by the OEPA or the other government agency and assessment by the OEPA or other government agency for approval is still pending.

## 5. TABLE OF COMPLIANCE (AUDIT TABLE)

This report has been prepared to address the status and compliance of the proposal with the conditions in the Statement in accordance with the annual compliance reporting requirements of conditions 4–1 to 4–6 of the Statement. This report addresses all open conditions.

### 5.1 Compliance with Statement No 1117 conditions

The detailed results of the audit of Statement 1117 are presented in Section 5.1 (Table 3). Condition 1-1 of Statement 1117 requires implementation of the proposal as documented in Schedule 1 of the Statement.

There were no potential or actual non-compliances identified during the audit.

#### Corrective actions

No corrective actions have been undertaken as there were no non-compliances identified in this reporting period.

Table 3: Results of audit of Statement No. 1117

Condition No. MS1117	Subject	Phase	Condition	How	Evidence	When	Compliance Status	Notes / Further Information
1-1	Implementation	Overall	When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Table 2 of Schedule 1, unless amendments to the proposal and the authorised extent of the proposal have been approved under the Environmental Protection Act (EP Act).  Table 2, Schedule 1: Vegetation Clearing shall not exceed:  No more than 10.69ha of which 3.26ha is within the KGP Lease and Buffer Zone lease and 7.43ha within the DBNGP Corridor and Dampier Facilities Area.	Implement the proposal as per MS1117 Table 2 Schedule 1	Vegetation Clearing Register  Weekly HSE Inspection Records  HSE Audits  Final construction GIS / survey date  Compliance Assessment Reports - 20210108 PNI MS 1117 ACAR Rev 1	During and post construction	Completed	No clearing was conducted in the reporting period
2-1	Contact Details	Overall	The proponent shall notify the Chief Executive Officer (CEO) of any change of its name, physical address or postal address for the serving of notices or other correspondence within twenty-eight (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State.	Notify the CEO of any change of name or address	Copy of correspondence with DWER	Within 28 days of such change	Compliant	The proponent name of AGI Operations Pty Ltd (AGID) and physical address remained unchanged during the reporting period.
3-1	Time Limit for Proposal Implementation	Overall	The proponent shall not commence implementation of the proposal after five (5) years from the date of this Statement, and any commencement, prior to this date, must be substantial.	Implement the proposal prior to 21 November 2024	Compliance Assessment Report – 20210108 PNI MS 1117 ACAR Rev 1  Daily Project Reports  Monthly project reports	By 21 November 2024	Completed	A notice of substantial completion was provided to DMIRS on 23 November 2021.  Operations commenced on 19 March 2022.
3-2	Time Limit for Proposal Implementation	Implementation	Any commencement of implementation of the proposal, on or before five (5) years from the date of this Statement, must be demonstrated as substantial by providing the CEO with written evidence, on or before the expiration of five (5) years from the date of this Statement.	Substantially commence the proposal.	Correspondence with DWER including Annual Compliance Assessment Report – 20210108 PNI MS 1117 ACAR Rev 1	By 21 November 2024	Completed	A notice of substantial completion was provided to DMIRS on 23 November 2021.  Operations commenced on 19 March 2022.
4-1	Compliance Reporting	Overall	The proponent shall prepare and maintain a Compliance Assessment Plan which is submitted to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition 4-6, or prior to	Approved Compliance Assessment Plan (this plan)	Correspondence with DWER (submission and approval of Compliance Assessment Plan)  20200602 DWER – DDG Statement 1117 Approval of	Prior to implementation or 6 months prior to first Compliance Assessment Report being due (21 August 2020)	Completed	A Compliance Assessment Plan (CAP) was submitted to DWER for approval on 29 April 2020. This meets the six months prior to the first Compliance Assessment Report (21 February 2021) requirement of the condition.  The CAP was approved on 2 June 2020

Condition No. MS1117	Subject	Phase	Condition	How	Evidence	When	Compliance Status	Notes / Further Information
			implementation of the proposal, whichever is sooner.		Compliance Assessment Plan  20200429 PNI Compliance Assessment Plan Rev 1			
4-2	Compliance Reporting	Overall	The Compliance Assessment Plan shall include: (1) the frequency of compliance reporting; (2) the approach and timing of compliance assessments; (3) the retention of compliance assessments; (4) the method of reporting of potential non-compliances and corrective actions taken; (5) the table of contents of Compliance Assessment Reports; and (6) public availability of Compliance Assessment Reports.	Approved Compliance Assessment Plan (this plan)	Correspondence with DWER (submission and approval of Compliance Assessment Plan)  20200602 DWER – DDG Statement 1117 Approval of Compliance Assessment Plan	Post submission to DWER	Completed	The CAP was deemed to meet all requirements as per DWER approval (as detailed by above).
4-3	Compliance Reporting	Overall	After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the requirements of condition 4-2, the proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by condition 4-1.	Compliance is assessed according to Compliance Assessment Plan	Correspondence with DWER (submission and approval of Compliance Assessment Plan)  Compliance Assessment Report  20200602 DWER – DDG Statement 1117 Approval of Compliance Assessment Plan	Within 15 months of the approval of the project (21 February) then annually	Compliant	This Annual Compliance Assessment Report is conducted in line with the approved CAP.
4-4	Compliance Reporting	Overall	The proponent shall retain reports of all compliance assessments described in the Compliance Assessment Plan required by condition 4-1 and shall make those reports available when requested by the CEO.	Reports, records and data shall be retained in accordance with document management system	Records available and used as evidence in Compliance Assessment Report	Annually	Compliant	Compliance assessment and site inspection records are kept.
4-5	Compliance Reporting	Overall	The proponent shall advise the CEO of any potential non-compliance within seven (7) days of that non-compliance being known.	All non-compliance events are reported within timeframes to the CEO	Correspondence with DWER (includes phone communication and written records)	Within 7 days of known non-compliance	Compliant	There were no non-compliances identified during the reporting period.  Event reporting for incidents is in place for the project with no non-compliances identified or reported during the reporting period.

Condition No. MS1117	Subject	Phase	Condition	How	Evidence	When	Compliance Status	Notes / Further Information
4-6	Compliance Reporting	Overall	The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the CEO. The Compliance Assessment Report shall: (1) be endorsed by the proponent's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf; (2) include a statement as to whether the proponent has complied with the conditions; (3) identify all potential non-compliances and describe corrective and preventative actions taken; (4) be made publicly available in accordance with the approved Compliance Assessment Plan; and (5) indicate any proposed changes to the Compliance Assessment Plan required by condition 4-1.	Submission of Compliance Assessment Report on time	Correspondence with DWER (includes submission and receipt of Annual Compliance Reports)  The approval of the Compliance Assessment Plan detailed the date of 21 February 2020 as the due date for the first report.  Annual Compliance Assessment Report – 20210108 PNI MS 1117 ACAR Rev 1	Within 15 months of the approval of the project (21 February 2020) then annually	Compliant	This Annual Compliance Assessment Report meets the requirements of the condition.
5-1	Public Availability of Data	Overall	Subject to condition 5-2, within a reasonable time period approved by the CEO of the issue of this Statement and for the remainder of the life of the proposal the proponent shall make publicly available, in a manner approved by the CEO, all validated environmental data (including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps), management plans and reports relevant to the assessment of this proposal and implementation of this Statement.	All public available data is updated and available both on request and through the Australian Gas Infrastructure Group (AGIG) Website.	AGIG website hosts relevant documentation and data. Reviewed when undertaking the Annual Compliance Report	Life of the proposal	Compliant	The CHMP and CEMP are included on the AGIG website ( <a href="https://www.agig.com.au/articles/pluto-nw-shelf-interconnector">https://www.agig.com.au/articles/pluto-nw-shelf-interconnector</a> )  Additionally, the Flora and Fauna Survey completed for the project is included on the website.
5-2	Public Availability of Data	Overall	If any data referred to in condition 5-1 contains particulars of: (1) a secret formula or process; or (2) confidential commercially sensitive information; The proponent may submit a request for approval from the CEO to not make these data publically available. In making such a request the proponent shall provide the CEO with an explanation and reasons why the data should not be made publically available.	Submission of requests to the CEO	Correspondence with DWER (in relation to requests)	As required	Not required at this stage	

Condition No. MS1117	Subject	Phase	Condition	How	Evidence	When	Compliance Status	Notes / Further Information
6-1	Cultural Heritage Management Plan Implementation	Overall	The proponent shall implement the proposal to meet the following environmental objective: (1) Avoid where possible and minimise direct and indirect impact so that the proposal does not cause long term impacts on Aboriginal Heritage values.	Implement Cultural Heritage Management Plan (CHMP)	Compliance Assessment Report details implementation of the CHMP. HSE Audits	Prior to and during the construction phase	Compliant	Implementation of the CHMP controls included the following:  Inspection of reinstatement works was undertaken by the Traditional Owner's representatives and confirmed the landform had successfully been reinstated to pre-existing landscape condition and to a high standard. Electronic notification was communicated confirming the successful reinstatement works completed.  Aerial Surveillance reports identify heritage locations and confirm continued avoidance of these areas (Appendix B)
6-2	Cultural Heritage Management Plan Implementation	Overall	In order to meet the requirements of condition 6-1, the proponent shall implement the Pluto - NWS Interconnector Cultural Heritage Management Plan (version 1, December 2018).	Implementation of the CHMP	Compliance Assessment Report details implementation of the CHMP HSE Audits	Until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 6-1	Compliant	The Proponent implemented the approved version of the CHMP throughout the reporting period.  Aerial Surveillance reports identify heritage locations and confirm continued avoidance of these areas (Appendix B).
6-3	Cultural Heritage Management Plan Implementation	Overall	The proponent shall implement the most recent version of the Cultural Heritage Management Plan which the CEO has confirmed by notice in writing, addresses the requirements of condition 6-1.	Approval of any revisions of the CHMP ensuring Condition 6-1 is met	Correspondence with DWER (approval of any new revisions) Compliance Assessment Reports against CHMP HSE Audits	Until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 6-1	Compliant	The Proponent implemented the approved version of the CHMP throughout the reporting period.  Aerial Surveillance reports identify heritage locations and confirm continued avoidance of these areas (Appendix B).
6-4	Cultural Heritage Management Plan Implementation	Overall	The proponent shall continue to implement the Cultural Heritage Management Plan (version 1, December 2018), or any subsequent revisions as approved by the CEO in condition 6-3, until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 6-1.	CEO confirms that the objective in Condition 6-1 has been met by the plan or revisions	Correspondence with DWER (approval of any new revisions) Compliance Assessment Reports against CHMP HSE Audits	Until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 6-1.	Compliant	The Proponent implemented the approved version of the CHMP throughout the reporting period.  Aerial Surveillance reports identify heritage locations and confirm continued avoidance of these areas (Appendix B).
7-1	Construction Environmental Management Plan Implementation	Overall	Construction Environmental Management Plan Implementation The proponent shall implement the proposal to meet the following environmental objective:  (1) Avoid, where possible, and minimise direct and indirect impacts as far as practicable to Priority flora; <i>Terminalia supranitifolia</i> (P3) and <i>Rhynchosia bungarensis</i> (P4). (2) Avoid, where possible, and minimise direct and indirect impacts as far as practicable to significant fauna; <i>Dasyurus hallucatus</i> (Northern Quoll) and <i>Liasis olivaceus barroni</i> (Pilbara Olive Python).	Construction Environmental Management Plan (CEMP)	Compliance Assessment Report details implementation of the CEMP  PNI Environmental Line List Rev 3 CP2400008-Z-LST-031-01  Clearing Register  HSE Audits	Until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 7-1.	Compliant	The Proponent implemented the approved version of the CEMP throughout the reporting period.  No clearing was undertaken in the reporting period and transit is restrained to approved tracks to avoid and minimise impacts to fauna and flora.
7-2	Construction Environmental Management Plan Implementation	Overall	In order to meet the requirements of condition 7-1, the proponent shall implement the Pluto North West Shelf Interconnector Construction Environmental Management Plan (Rev B, April 2019).	Implementation of the CEMP	Compliance Assessment Report details implementation of the CEMP HSE Audits Aerial Surveillance Reports	Until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 7-1.	Compliant	The Proponent implemented the approved version of the CEMP throughout the reporting period.  No clearing was undertaken in the reporting period and transit is restrained to approved tracks to avoid and minimise impacts to fauna and flora.  Event reporting for incidents is in place for the project with no non-compliances identified or reported during the reporting period.

Condition No. MS1117	Subject	Phase	Condition	How	Evidence	When	Compliance Status	Notes / Further Information
					Site inspection reports			Aerial surveillance inspections provide confirmation of implementation of CEMP controls.
7-3	Construction Environmental Management Plan Implementation	Overall	The proponent shall implement the most recent version of the Construction Environmental Management Plan which the CEO has confirmed by notice in writing, addresses the requirements of condition 7-1.	Approval of any revisions of the CEMP ensuring Condition 7-1 is met	Correspondence with DWER  Compliance Assessment Reports against CEMP including HSE Audits and Weekly HSE Inspections	Until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 7-1.	Compliant	The Proponent implemented the approved version of the CEMP throughout the reporting period.  No revisions were required during the period.
7-4	Construction Environmental Management Plan Implementation	Overall	The proponent shall continue to implement the Construction Environmental Management Plan (Rev B, April 2019), or any subsequent revisions as approved by the CEO in condition 7-3, until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 7-1.	CEO confirms that the objective in Condition 7-1 has been met by the plan or revisions	Correspondence with DWER  Compliance Assessment Reports against CEMP including HSE Audits and Weekly HSE Inspections	Until the CEO has confirmed by notice in writing that the plan meets the objective specified in condition 7-1.	Compliant	The Proponent implemented the approved version of the CEMP throughout the reporting period. Refer to Section 7-2 above for further details.

## 6. ENVIRONMENTAL INFORMATION AND MONITORING

Limited monitoring was completed during the reporting period based on the change to operations from commissioning and practical completion in the last reporting period. This includes the following monitoring for the period:

- Emissions monitoring is conducted (fugitive emissions from pipeline transmission) and reported quarterly to DMIRS and calculated annually as part of NGERS reporting requirements. Fugitive emissions based on Method 1 calculation indicates an annual emission of 38.346 tCO<sub>2e</sub>.
- Rehabilitation monitoring will commence in line with seasonal requirements (April-May 2023).
- Corrosion Protection survey work is conducted annually as part of pipeline integrity.

## 7. STATEMENT REGARDING COMPLIANCE

The audit identified no non-compliances against MS1117 for the 2022 reporting period.

A Statement of Compliance is included as Appendix A.

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# APPENDIX A: STATEMENT OF COMPLIANCE

## Statement of Compliance

### 1 Proposal and Proponent Details

Proposal Title	<i>Pluto North West Shelf Interconnector Pipeline</i>
Statement Number	<i>1117</i>
Proponent Name	<i>AGI Operations Pty Limited</i>
Proponent's Australian Company Number (where relevant)	081 609 289

### 2 Statement of Compliance Details

Reporting Period	<i>21/11/21 to 20/11/22</i>
------------------	-----------------------------

Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction		Construction	✓	Operation	✓	Decommissioning	

Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:	✓
<p>An audit table for the Statement addressed in this Statement of Compliance must be provided as Attachment 2 to this Statement of Compliance. The audit table must be prepared and maintained in accordance with the Department of Water and Environmental Regulation (DWER) <i>Post Assessment Guideline for Preparing an Audit Table</i>, as amended from time to time. The 'Status Column' of the audit table must accurately describe the compliance status of each implementation condition and/or procedure for the reporting period of this Statement of Compliance. The terms that may be used by the proponent in the 'Status Column' of the audit table are limited to the Compliance Status Terms listed and defined in Table 1 of Attachment 1.</p>	

Were all implementation conditions and/or procedures of the Statement complied with within the reporting period? (please tick ✓ the appropriate box)			
No (please proceed to Section 3)		Yes (please proceed to Section 4)	✓

### 3 Details of Non-compliance(s) and/or Potential Non-compliance(s)

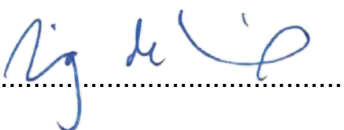
The information required Section 3 must be provided for each non-compliance or potential non-compliance identified during the reporting period covered by this Statement of Compliance.

#### Non-compliance/potential non-compliance 3-1

Which implementation condition or procedure was non-compliant or potentially non-compliant?	
Was the implementation condition or procedure non-compliant or potentially non-compliant?	
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?	
Was this non-compliance or potential non-compliance reported to the General Manager, OEPA?	
<input type="checkbox"/> Yes <input type="checkbox"/> Reported to DWER verbally Date __ __ <input type="checkbox"/> Reported to DWER in writing Date _____	<input type="checkbox"/> No
What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?	
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)	
What was the cause(s) of the non-compliance or potential non-compliance?	
What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?	
What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?	
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure: <ul style="list-style-type: none"> <li>• in the reporting period addressed in this Statement of Compliance; and</li> <li>• as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance.</li> </ul> (the above information may be provided as an attachment to this Statement of Compliance)	

**Proponent Declaration**

I, Craig de Laine (CEO) declare that I am authorised on behalf of AGI Operations Pty Limited (being the person responsible for the proposal) to submit this form and that the information contained in this form is true and not misleading.

Signature:  .....

Date: 20 February 2023 .....

Please note that:

- it is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give or cause to be given information that to his knowledge is false or misleading in a material particular; and
- the Chief Executive Officer of the DWER has powers under section 47(2) of the *Environmental Protection Act 1986* to require reports and information about implementation of the proposal to which the statement relates and compliance with the implementation conditions.

**4 Submission of Statement of Compliance**

One hard copy and one electronic copy (preferably PDF on CD or thumb drive) of the Statement of Compliance are required to be submitted to the Chief Executive Officer, DWER, marked to the attention of Manager, Compliance (Ministerial Statements).

Please note, the DWER has adopted a procedure of providing written acknowledgment of receipt of all Statements of Compliance submitted by the proponent, however, the DWER does not approve Statements of Compliance.

**5 Contact Information**

Queries regarding Statements of Compliance, or other issues of compliance relevant to a Statement may be directed to Compliance (Ministerial Statements), DWER:

**Manager, Compliance (Ministerial Statements)**

**Department of Water and Environmental Regulation**

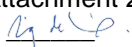
Postal Address: Locked Bag 10  
EAST PERTH WA 6892

Phone: (08) 6364 7000

Email: [compliance@dwer.wa.gov.au](mailto:compliance@dwer.wa.gov.au)

**6 Post Assessment Guidelines and Forms**

Post assessment documents can be found at [www.epa.wa.gov.au](http://www.epa.wa.gov.au)

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance. INITIALS: 

**ATTACHMENT 1****Table 1 Compliance Status Terms**

<b>Compliance Status Terms</b>	<b>Abbrev</b>	<b>Definition</b>	<b>Notes</b>
Compliant	C	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	This term applies to audit elements with: <ul style="list-style-type: none"> <li>ongoing requirements that have been met during the reporting period; and</li> <li>requirements with a finite period of application that have been met during the reporting period, but whose status has not yet been classified as 'completed'.</li> </ul>
Completed	CLD	A requirement with a finite period of application has been satisfactorily completed.	This term may only be used where: <ul style="list-style-type: none"> <li>audit elements have a finite period of application (e.g. construction activities, development of a document);</li> <li>the action has been satisfactorily completed; and</li> <li>the DWER has provided written acceptance of 'completed' status for the audit element.</li> </ul>
Not required at this stage	NR	The requirements of the audit element were not triggered during the reporting period.	This should be consistent with the 'Phase' column of the audit table.
Potentially Non-compliant	PNC	Possible or likely failure to meet the requirements of the audit element.	This term may apply where during the reporting period the proponent has identified a potential non-compliance and has not yet finalized its investigations to determine whether non-compliance has occurred.
Non-compliant	NC	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.	This term applies where the requirements of the audit element are not "complete" have not been met during the reporting period.
In Process	IP	Where an audit element requires a management or monitoring plan be submitted to the DWER or another government agency for approval, that submission has been made and no further information or changes have been requested by the DWER or the other government agency and assessment by the DWER or other government agency for approval is still pending.	<p><b>The term 'In Process' may not be used for any purpose other than that stated in the Definition Column.</b></p> <p>The term 'In Process' may not be used to describe the compliance status of an implementation condition and/or procedure that requires implementation throughout the life of the project (e.g. implementation of a management plan).</p>

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# APPENDIX B: AERIAL SURVEILLANCE REPORT


## AERIAL SURVEILLANCE REPORT





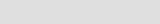
Pluto Northwest Shelf Interconnector (PNI)

### SURVEILLANCE REPORT MUST BE EMAILED TO THE FOLLOWING ASAP AT THE COMPLETION OF THE FLIGHT

Rakai, Tawake  
[tawake.rakai@agig.com.au](mailto:tawake.rakai@agig.com.au)

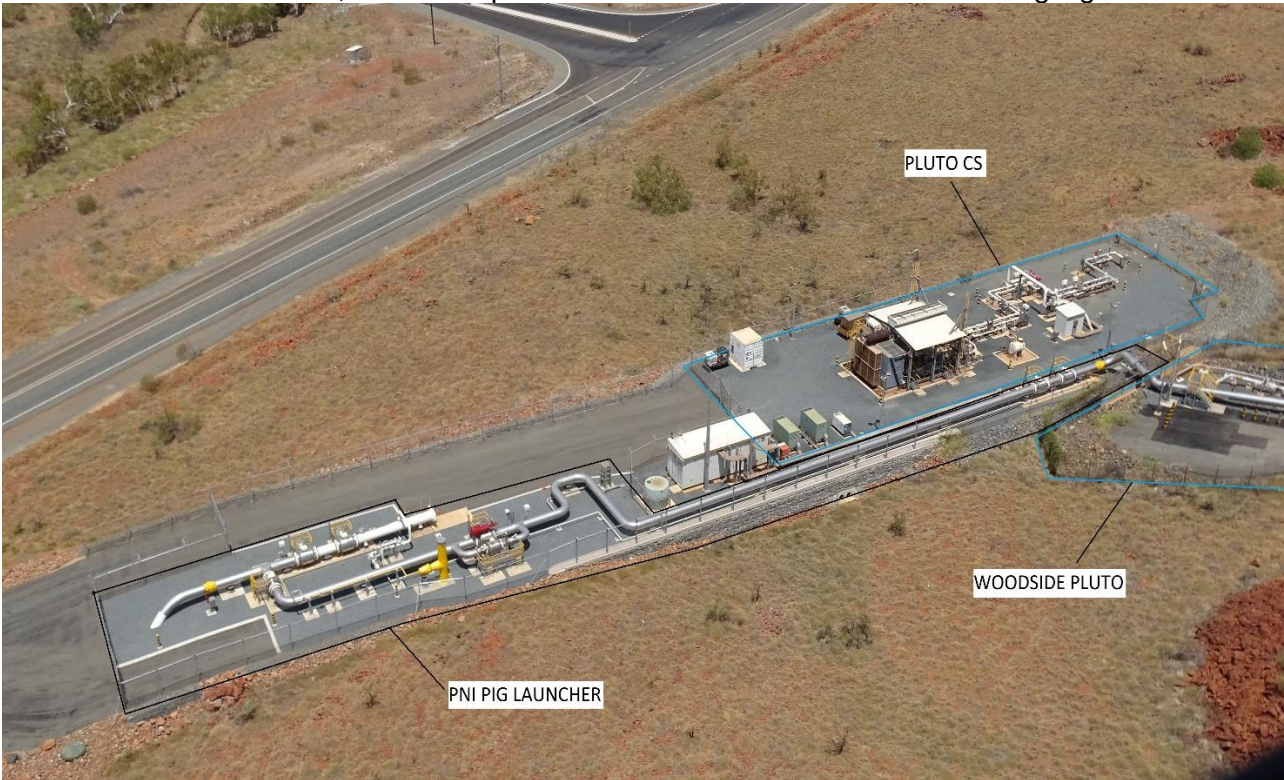

Smith, James  
[james.smith@agig.com.au](mailto:james.smith@agig.com.au)

Aircraft Type	Pilot Name	Area Covered	Weather Conditions (temp; visibility, wind and rain)	
VH-ZKK	Pat Dunkell	Karratha Gas Plant > Pluto Northwest Interconnector	Variable winds, clear, 40 Degrees	
Work Order Number	Employee Name	Date of Surveillance	Engine On Time	Engine Off Time
3000155185	Chris Delborrello	15/03/2022	N/A	N/A
AGIG REV	DATE	APPROVED RELEASE	BY	CHK/APPR
Rev0	17/03/2022	Issued for information	Chris Delborrello C Delborrello	 IMcCabe

<b>Summary of Report</b>	<ul style="list-style-type: none"> <li>Updated images and information of facilities &amp; points of interest.</li> </ul>
<b>Note:</b>	<p>Images of facilities and other general points of interest obtained during the surveillance flight are not necessarily included in this report due to no new activity being observed, should any images or further information be required please contact Manager Facilities, Facilities Lands Team Leader or the Aerial Surveillance Team.</p> <p>Aerial Surveillance activities are conducted as per DBP-WI-PMC-PIP-06</p>
<b>Legend:</b>	<p>Easement and Pipe locations are only approximations of actual locations.</p> <ul style="list-style-type: none"> <li> Easement boundary</li> <li> Extended easement boundary</li> <li> Pipeline</li> <li> Areas of interest</li> <li> Heritage areas</li> </ul>


## AERIAL SURVEILLANCE REPORT

### Pluto Northwest Shelf Interconnector (PNI)

Location	Comment
<p>PNI Inlet Station</p>	<ul style="list-style-type: none"> <li>Below image shows the current condition of the PNI Inlet Station at KP.0</li> <li>The PIG Launcher, Pluto Compressor and Woodside Pluto assets are highlighted.</li> </ul>  <ul style="list-style-type: none"> <li>Below image shows the PNI right of way (ROW) in relation to the PNI Inlet Station.</li> </ul> 



## AERIAL SURVEILLANCE REPORT

### Pluto Northwest Shelf Interconnector (PNI)

Location	Comment
PNI ROW	<ul style="list-style-type: none"> <li>• Two heritage areas along the ROW at KP 0.10 &amp; KP 0.25 appear undisturbed.</li> <li>• Two T3 watercourses are highlighted blue at KP 0.04 &amp; KP 0.15</li> </ul> 



## AERIAL SURVEILLANCE REPORT

Pluto Northwest Shelf Interconnector (PNI)

Location	Comment
PNI ROW	<ul style="list-style-type: none"> <li>Below image shows the PNI ROW and two T3 watercourses crossing at KP 0.39 &amp; KP 0.49</li> </ul> 
PNI ROW	<ul style="list-style-type: none"> <li>Below image shows the PNI ROW at KP 0.69</li> <li>Small water crossing point highlighted at KP 0.70</li> </ul> 



## AERIAL SURVEILLANCE REPORT

### Pluto Northwest Shelf Interconnector (PNI)

Location	Comment
PNI ROW	<ul style="list-style-type: none"> <li>One heritage area along the ROW at KP 0.94 appears undisturbed.</li> <li>One T3 watercourse is highlighted blue at KP 0.92</li> </ul> 
Pluto LNG access road	<ul style="list-style-type: none"> <li>Below image shows the crossing point of the Pluto LNG Plant access road at KP 1.22</li> <li>Below image shows the road drain crossing at KP 1.21</li> </ul> 



## AERIAL SURVEILLANCE REPORT

Pluto Northwest Shelf Interconnector (PNI)

Location	Comment
PNI ROW	<ul style="list-style-type: none"> <li>Below image shows the PNI ROW passing MLV5 at KP 1.60</li> </ul> 
Burrup Peninsula Road	<ul style="list-style-type: none"> <li>Below image shows the current condition of the road crossing at KP 1.78</li> </ul> 

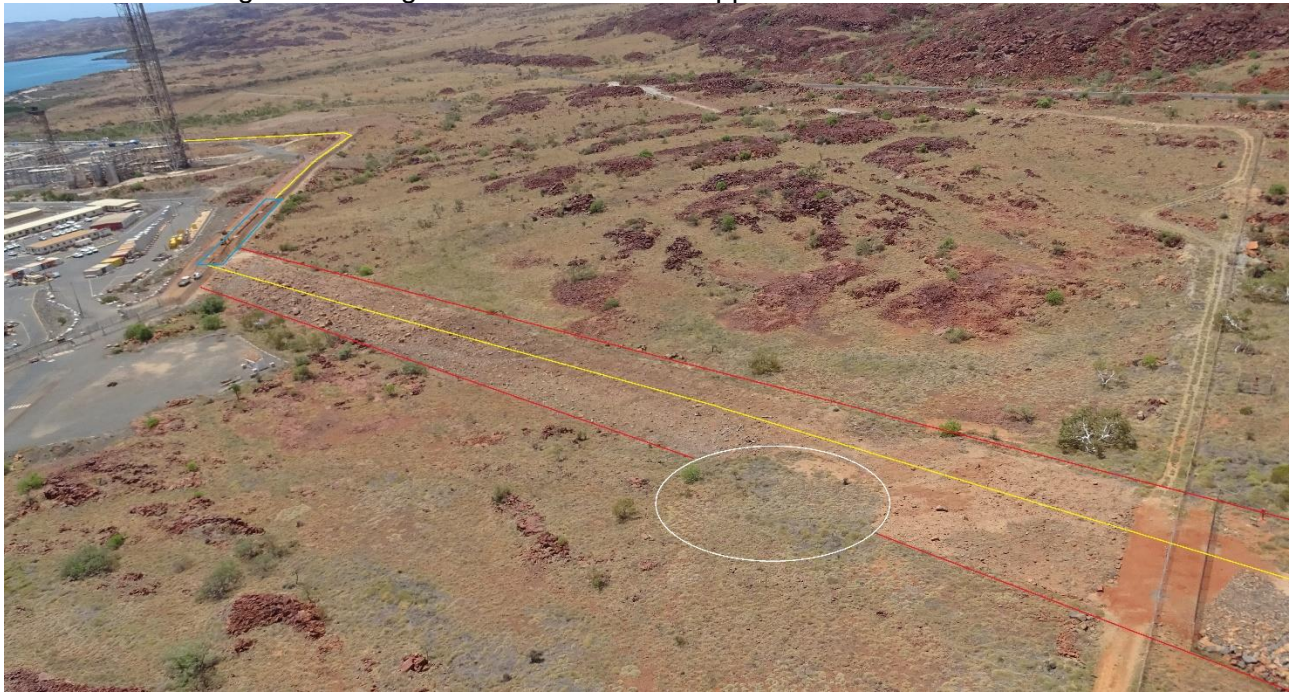

## AERIAL SURVEILLANCE REPORT

### Pluto Northwest Shelf Interconnector (PNI)

Location	Comment
PNI Meter Station	<ul style="list-style-type: none"> <li>Below image shows the pipeline traversing through PNI Meter Station from KP 1.93 to KP 2.11</li> </ul> 
PNI Meter Station	<ul style="list-style-type: none"> <li>Below image shows the pipeline traversing through PNI Meter Station from KP 1.93 to KP 2.11</li> </ul> 

## AERIAL SURVEILLANCE REPORT

### Pluto Northwest Shelf Interconnector (PNI)

Location	Comment
PNI ROW	<ul style="list-style-type: none"> <li>Below image shows the PNI ROW within Woodside from KP 2.11 to KP 3.06</li> <li>One heritage area along the ROW at KP 2.15 appears undisturbed.</li> </ul> 
PNI ROW	<ul style="list-style-type: none"> <li>Below image shows the PNI ROW within Woodside from KP 2.11 to KP 3.06</li> <li>Excavation works observed occurring within the Woodside controlled area for the reinstallation of cabling for the replacement of their perimeter lighting.</li> </ul> 

## AERIAL SURVEILLANCE REPORT

Pluto Northwest Shelf Interconnector (PNI)

Location	Comment
PNI Receiver Station	<ul style="list-style-type: none"> <li>Below image shows the PNI Receiver Station at KP 3.09 within Karratha Gas Plant.</li> </ul> 