

Pluto LNG Project – Ministerial Statement 757 Compliance Report 2009

Pluto Liquefied Natural Gas Development (Site B Option) Burrup Peninsula, Shire of Roebourne.

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1. INTRODUCTION

This Environmental Compliance Report demonstrates compliance with conditions outlined in Ministerial Statement 757 for the Pluto Liquefied Gas Development (Site B option) Burrup Peninsula, Shire of Roebourne. Construction works for the Pluto LNG Project commenced on 15 October 2007, following receipt of the Commonwealth Decision Approval. This report meets the annual reporting requirements of Condition 4.1 of Ministerial Statement 757 and covers a reporting period of October 2008 to October 2009.

Since October 2008, construction of the Pluto LNG Project has progressed significantly. Combined with the other activities that make up the full project the overall progress of the project is currently approximately 82% complete. The status of the onshore components covered by Ministerial Statement 757 at the end of the reporting period is as follows;

- Pluto Site B bulk civil works complete and modular and stick-build components of the LNG train being assembled;
- Pluto Site A erection of the two LNG tanks and three condensate tanks has been completed and tank finishing continues. Mechanical, electrical and instrumentation works continue;
- Nearshore trunkline pre-lay pipeline dredging works and shore crossing preparation works were completed in May 2009. Nearshore pipelay was completed in September 2009. Secondary stabilisation works continue;
- Jetty all major infrastructure installed and weld-out and pre-commissioning has commenced:
- Shipping channel dredging the second phase of dredging (turning basin and shipping channel) commenced and is scheduled for completion in 2010.

1.1 STRUCTURE OF THIS DOCUMENT

Section 2 contains the relevant conditions, action taken and evidence produced to demonstrate that these conditions have been met. Evidence for each of these conditions has been presented in the appendices (where relevant). Photographic evidence of compliance against the construction Environmental Management Plans is provided in Appendix 1. Appendix 2 demonstrates compliance with the key actions contained within Environmental Management Plans. Appendix 3 demonstrates compliance against Best Environmental Practice (BEP) Techniques which were established within the Dredge and Spoil Disposal management Plan (DSDMP). Appendices 4 – 6 summarise previous correspondence between Woodside and DEC regarding Water Quality Exceedances, Marine Quarantine clearances and Coral Spawning Assessments.

This document complies with the requirements of the Annual Audit Program approved by the Department of Environment and Conservation on 30 June 2008.

Note:

- Code prefixes: M = Minister's condition; P = Proponent's commitment; A = Audit specification; N = Procedure.
- Any elements with status = "Audited by proponent only" are legally binding but are not required to be addressed specifically in compliance reports, if complied with.
- Acronyms list: Chief Executive Officer CEO; Department of Environmental Protection DEP; Evaluation
 Division Part IV; Pollution Prevention Division Part V; Waste Management Division WMD; Department of
 Conservation and Land Management CALM; Department of Minerals and Energy DME; Environmental
 Protection Authority EPA; Health Department of WA HDWA; Water and Rivers Commission WRC; Bush
 Fires Board B

2. MINISTERIAL CONDITIONS AND COMMITMENTS

 Table 1: Pluto LNG Project (Site B option), Conditions and Commitments

Audit Code	What action must be taken	Project phase	To requirements of	Status: October 2008 – October 2009
Subject	• What action must be taken • How action must be taken and/or objective of action	When action to be	On advice from	Status: October 2006 – October 2009
• Subject	Objective	taken	on advice nom	
	• Evidence that action has been taken	Where it is to be		
		taken		
757:M1.1	Action Implement the proposal as documented and described in schedule 1 of this statement (Ministerial	Overall	Minister for Environment	In Progress
Proposal	Statement 757) subject to the conditions and procedures of this statement.	Ongoing		Occidential and the AS October 2007. Decreased has been included as a serviced by Michaeland
Implementation	Objective To minimise environmental impact of the project.			Construction commenced on 15 October 2007. Proposal has been implemented as required by Ministerial Statement 757.
	Objective To minimise environmental impact of the project.			Statement 151.
	Evidence Confirmed in Pluto LNG Project Ministerial Statement 757 Compliance Report.			Photos have been provided of site construction activities throughout 2009.
757:M2.1	Action The proponent for the time being nominated by the Minister for the Environment under sections	Overall	Minister for Environment	Appendix 1 – Photos of Pluto LNG Project construction throughout 2009. In Progress
Proponent	38(6) or 38(7) of the Environmental Protection Act 1986 (the Act) is responsible for the implementation of	Ongoing	Minister for Environment	III Flogress
Nomination and	the proposal.	ogog		Woodside Energy Ltd remains responsible for implementation of Ministerial Statement 757 as instructed by
Contact Details				the Minister of Environment.
	Objective To ensure legal responsibility for the project rests with a nominated proponent.			
	Evidence Confirmed in Pluto LNG Project Ministerial Statement 757 Compliance Report.			
757:M2.2	Action Notify the Chief Executive Officer of the Department of Environment and Conservation (CEO) of	Overall	DEC	Not applicable for 2008-2009 reporting period
Proponent	any change of the name and address of the proponent for the serving of notices or other correspondence	Ongoing		
Nomination and	within 30 days of such change.			Name and address of proponent remains the same as original application.
Contact Details	<u>How</u> In the event of change in address, notify DEC within 30 days of change.			
	Objective To ensure that the DEC is able to maintain contact with the proponent			
757.140.4	Evidence Details of change of name/and or address.	Overall	Minister for Environment	Completed
757:M3.1 Time Limit of	Action The proposal must be substantially commenced within 5 years of the date of publication of this statement.	Overall Within 5 years	Minister for Environment	Completed
Authorisation	Statement.	William 5 years		Construction commenced on 15 October 2007. Proposal has been implemented as demonstrated in Pluto
	Objective To ensure that the project is implemented using the most recent information and technology			LNG Project Ministerial Statement 757 - 2008 Annual Compliance Report.
	available.			
	Evidence Pluto LNG Project Ministerial Statement 757 Compliance Report.			
757:M3.2	Action Provide the CEO with written evidence which demonstrates that the proposal has substantially	Overall	Minister for Environment	Completed
Time Limit of	commenced on or before the expiration of 5 years from the date of this statement.	Within 5 years		
Authorisation	Objective To analyze that the preject is implemented uping the most recent information and technology			Pluto LNG Project Ministerial Statement 757 - 2008 Annual Compliance Report provided evidence which demonstrated the substantial implementation of the Project.
	Objective To ensure that the project is implemented using the most recent information and technology available.			demonstrated the substantial implementation of the Project.
	available.			
	Evidence Confirm in Pluto LNG Project Ministerial Statement 757 Compliance Report.			
757:M4.1	Action Submit to the CEO an annual environmental compliance report relating to the previous twelve-	Operation	DEC	In Progress
Compliance Reporting	month period, the first report to be submitted within 15 months after the commencement of operations and thereafter annually, unless required by the CEO to report more frequently.	Annually Reported		
rtoporting	anordator annually, amode required by the object to report more nequently.			Pluto LNG Project Ministerial Statement 757 Compliance Report was submitted for the period of October
	Objective To provide evidence that the proposal is being implemented as approved, and the relevant			2008-October 2009. Content includes "Evidence" listed in this audit table against each Ministerial Condition.
	conditions and commitments are being met.			Pluto LNC Project Ministerial Statement 757 Compliance Benert 20000 has been submitted by 45 January
	Evidence Pluto LNG Project Ministerial Statement 757 Compliance Report to be submitted for the period			Pluto LNG Project Ministerial Statement 757 Compliance Report 20009 has been submitted by 15 January 2010 deadline.
	of October 2007 - October 2008. Content to include the "Evidence" listed in this audit table against each			2010 doddinio.
	Ministerial Condition plus internal audit results. First report to be submitted by 15 January 2009.			
757:M4.2	Action The environmental compliance reports shall address each element of an audit program approved	Overall	DEC	Completed
Compliance Reporting	by the CEO and shall be prepared and submitted in a format acceptable to the CEO.			Pluto LNG Project Annual Audit Program was submitted for DEC comment on 28 May 2008. DEC
Toporting	Objective To provide evidence that the proposal is being implemented as approved, and the relevant			subsequently approved the audit program on 30 June 2008.
	conditions and commitments are being met.			
	Evidence Audit Drogram			The 2009 environmental compliance report follows the approved format.
	Evidence Audit Program.			

Audit Code	What action must be taken	Project phase	To requirements of	Status: October 2008 – October 2009
• Subject	How action must be taken and/or objective of action	When action to be	On advice from	Status. Salobol 2000 Solobol 2000
	Evidence that action has been taken	taken • Where it is to be taken		
757:M4.3 Compliance	Action The environmental compliance reports shall: 1. be endorsed by signature of the proponent's Managing Director or a person, approved in writing by the CEO, delegated to sign on behalf of the	Overall	DEC	Completed
Reporting	proponent's Managing Director; 2. state whether the proponent has complied with each condition and procedure contained in this statement; 3. provide verifiable evidence of compliance with each condition			Pluto LNG Project Ministerial Statement 757 Compliance Report 2009 fulfils requirements of 757:M:4.3
	and procedure contained in this statement; 4. state whether the proponent has complied with each key action contained in any environmental management plan or program required by this statement; 5. provide verifiable evidence of conformance with each key action contained in any environmental management plan or program required by this statement; 6. identify all non-compliances and non-conformances and			Woodside has complied with each key action contained within any Environmental Management Plan or program required by Woodside's ministerial conditions. Appendix 2 outlines evidence of compliance with key actions of each Management Plan.
	describe the corrective and preventative actions taken in relation to each non-compliance or non-conformance; 7. review the effectiveness of all corrective and preventative actions taken; and 8. describe the state of implementation of the proposal.			A progress update is provided in the introduction to this Compliance Report.
	Objective To demonstrate compliance with Ministerial Conditions.			
757 144 4	Evidence See condition M4.1.	O II	DEO	In December 2
757:M4.4 Compliance	Action Make the environmental compliance reports required by Condition 4-1 publicly available in a manner approved by the CEO.	Overall Annually	DEC	In Progress
Reporting	How Environmental compliance reports to be made available in the following locations: - the Local Government Authority (2 copies), Battye Library (2 copies); Karratha Public Library (2 copies); and DEC Library Perth (2 copies - 1 hard copy, 1 cd copy) - Copies also to be freely available for download from the			Pluto LNG Project Ministerial Statement 757 Compliance Report 2008 was made publicly available following submission to Department of Environment and Conservation (DEC) on the Woodside internet site; http://www.woodside.com.au/Our+Business/Projects/Pluto/Sustainability/
	Woodside internet site, (availability and locations of compliance reports are to be advertised in the Local newspaper Public Notices).			Pluto LNG Project Ministerial Statement 757 Compliance Report 2009 and 2008 will be made available in the required locations and on the Woodside internet site. Verification of appropriate distribution will be provided to DEC in the Pluto LNG Project Ministerial Statement 757 Compliance Report 2010.
	Objective To provide evidence that the proposal is being implemented as approved, and the relevant conditions and commitments are being met.			
	Evidence Letter to DEC Compliance Monitoring Section annually that the compliance report has been advertised as required.			
757:M5.1 Performance Review	Action Submit a Performance Review report, every five years after the start of operations to the Environmental Protection Authority, which addresses: 1. the major environmental issues associated with implementing the project; the environmental objectives for those issues; the methodologies used to	Operation Every 5 years	EPA	Not applicable for 2008-2009 reporting period Condition not applicable within Annual Compliance Reporting timeframe.
	achieve these; and the key indicators of environmental performance measured against those objectives; 2. the level of progress in the achievement of sound environmental performance, including industry			Contained not applicable main / made Compilates respecting amonation.
	benchmarking, and the use of best available technology where practicable; 3. significant improvements gained in environmental management, including the use of external peer reviews; 4. stakeholder and community consultation about environmental performance and the outcomes of that consultation, including			
	a report of any on-going concerns being expressed; and 5. the proposed environmental objectives over the next five years, including improvements in technology and management processes.			
	How 5-yearly report will be submitted following commencement of operations.			
	Objective To demonstrate compliance with Ministerial Conditions.			
	Evidence Submit 5-yearly Performance Review report to the EPA.			
757:M5.2 Performance Review	Action Make the Performance Review reports required by condition 5-1 publicly available in a manner approved by the CEO.	Operation Every 5 years	DEC	Not applicable for 2008-2009 reporting period
	How Performance Review Reports to be made available in the following locations: - the Local Government Authority (2 copies), Battye Library (2 copies); Karratha Public Library (2 copies); and DEC Library Perth (2 copies - 1 hard copy, 1 cd copy) - Copies also to be freely available for download from the Woodside internet site, (availability and locations of Performance Review reports are to be advertised in the Local newspaper Public Notices).			Condition not applicable within Annual Compliance Reporting timeframe.
	Objective To ensure the public is kept informed.			
	Evidence Letter to DEC Compliance Monitoring Section that the Performance Review Report has been advertised as required.			

Audit Code Subject	What action must be taken How action must be taken and/or objective of action	Project phaseWhen action to be	To requirements of On advice from	Status: October 2008 – October 2009
	Objective Evidence that action has been taken	taken • Where it is to be taken		
757:M6.1 Marine Impacts	Action Undertake all works to ensure that the Limits of Coral Loss, specified in Schedule 2 (of Ministerial Statement 757), associated with each of the designated Impact Criteria Zones described and defined in figure 3, are not exceeded. How - Implement Best Environmental Practice (BEP) techniques; - Implement the DSDMP specified Water Quality Monitoring Program to identify any decline in water quality and allow contingency management actions to be applied; - Implement the DSDMP specified Coral Health Monitoring Program to identify any net coral mortality and allow contingency management actions to be applied. Objective To minimise impact of dredging on the marine environment. Evidence Ongoing provision of Water Quality Reports and Coral Health Reports to the Pluto DEMG on a timely basis for review and overview of status. Results of the above captured in DEMG minutes; Compliance reports to the DEC Compliance Monitoring Section if Level 1, 2 or 3 trigger levels are exceeded.	Construction During Construction	Minister for Environment	In Progress Levels of coral loss as a result of the Pluto LNG Project dredging program are below the limits specified in Schedule 2 of the Ministerial Statement. A comprehensive water quality and coral health monitoring program has been implemented as outlined in the dredging and Spoil Disposal Management Plan (DSDMP). A dedicated intranet site has been established for Pluto Dredge Environmental Management Group (DEMG) members to allow timely access to monitoring data, and regular minuted meetings have been held throughout the program. Compliance reports have been provided to the DEC Proposal Implementation Monitoring Section for all Level 1 trigger criterion exceedances recorded in 2009. No coral criterion exceedances have been attributed to dredging activities to date. The DEMG has been consulted in all instances. Refer to Condition 6-2 to 6-4 for additional detail. Proactive turbidity reduction measures (DSDMP Best Environmental Practice Techniques) have been implemented to reduce the potential for impact. Refer to Appendix 3 for evidence of implementation.
757:M6.2 Compliance Reporting	Action If any Level 1 Coral Condition Management Trigger Criterion referred to in Schedule 3 is exceeded, within 12 hours following detection of the exceedance, notify the CEO and provide details of the actions being taken to reduce turbidity generating activities which are effecting that site; and within 24 hours of the criterion being exceeded, implement management actions to keep impacts within approved limits specified in schedule 2. How Management actions taken are dependent on circumstances (dredge location, meteorological conditions, tide etc.). Appropriate contingency actions will be selected from those specified in the DSDMP in consultation with the DEMG. Objective To minimise impact of dredging on the marine environment. Evidence Compliance reports to the DEC CEO in the event of a Schedule 3 exceedance; DEMG minutes outlining actions taken and assessment of adequacy.	Construction	DEC	In Progress The DEC CEO has been notified within 12 hours (from detection) of all Level 1 Coral Condition Management Trigger Criterion exceedances that have been recorded to date (Appendix 4). No Level 1 Coral Condition Management Trigger Criterion exceedances have occurred in Impact Criteria Zone B. No Level 1 Coral Condition Management Trigger Criterion exceedances in Impact Criteria Zone C (L1C Criterion Exceedances) have been directly attributed to dredging related activities. Two L1C Criterion Exceedances were classified as a moderate probability of dredging influence due to their proximity to recent dumping activities. These two exceedances were reviewed by the DEMG who concluded that no reactive management actions were warranted given that these exceedances were likely to have been largely driven by metocean conditions associated with Tropical Cyclone Billy. Appendix 4 lists all previously submitted L1C Criterion Exceedance compliance reports and related DEMG advice during 2009.
757:M6.3 Compliance Reporting	Action If any Level 2 Coral Condition Management Trigger Criterion referred to in schedule 3 is exceeded at any monitoring site,; 1. Immediately suspend all dredging and dredge spoil activities that contributed to the exceedance; 2. Provide a report to the CEO on the measures to be implemented to keep impacts below the limits in schedule 2, prior to recommencing any dredging and dredge spoil activities that contributed to the exceedance which could affect that site; and 3. Provide a report, on advice of the Dredge Environmental Management Group, defining marine water quality conditions which will be met for the endorsement of the Minister for the Environment on advice of the CEO to allow for the recommencement of dredging ensuring that mortality and / or impacts will not exceed the limits specified in schedule 2. How The Coral Health Monitoring Program will be maintained with the results made immediately available to the Dredging Environmental Coordinator and Dredging Senior Environmental Advisor. Should an exceedance be identified, the process specified by MC6-3 will be implemented. Objective To minimise impact of dredging on the marine environment. Evidence Notification reports to the CEO in the event of a Schedule 3 exceedance; Investigation reports analysing the exceedance; Reports required by 2 and 3 of MSt: 6.3.		DEC	In Progress No Level 2 Coral Condition Management Trigger Criterion exceedances have occurred in Impact Criteria Zone B or Zone C during the 2009 reporting timeframe.
757:M6.4 Compliance Reporting	Action If any Level 3 Coral Condition Management Trigger Criterion referred to in schedule 3 is exceeded at any monitoring site, 1. Immediately suspend all dredging and dredge spoil activities that contributed to the exceedance; and 2.Provide a report to the Minister for the Environment regarding the non-compliance with condition 6-1. How As per Ministerial Condition 6.3 above. Objective To minimise impact of dredging on the marine environment. Evidence Investigation reports analysing the exceedance. Compliance reports to the Minister for the Environment regarding the Schedule 3 exceedance.	Construction	Minister for Environment	In Progress No Level 3 Coral Condition Management Trigger Criterion exceedances have occurred in Impact Criteria Zone B or Zone C during the 2009 reporting timeframe.

Audit Code	What action must be taken	Project phase	To requirements of	Status: October 2008 – October 2009
Subject	• What action must be taken • How action must be taken and/or objective of action	When action to be	On advice from	Status. October 2000 - October 2009
	Objective	• Where it is to be		
	Evidence that action has been taken	taken		
757:M6.5 Marine Impacts	Action Prior to commencement of turbidity-generating activities, prepare a Dredge Impact Management Plan for dredge activities which demonstrates that the activities can achieve the management targets for	Design	Minister for Environment EPA	Completed
·	the Marine Park as set out in the Indicative Management Plan for the Proposed Dampier Archipelago Marine Park and Cape Preston Marine Management Area, and which demonstrates that management			The Dredge and Spoil Disposal Management Plan was approved by DEC on 20 March 2008 (DEC ref: 4610).
	strategies will be employed which will minimise impacts on benthic habitats and communities (including corals) outside the Marine Park, to the requirements of the Minister on advice of the Environmental Protection Authority. Further details on the content required in this Plan are provided in schedule 4.			The DSDMP was revised in August 2009 (Revision 9) to incorporate changes to the Water Quality Exceedance Investigation Protocol approved by DEC on 10 August 2009. The DSDMP was re-submitted to DEC with these approved changes incorporated on 25 November 2009 (WBPL ref: PLU/GOV/00422).
	How DSDMP (DIMP) developed in consultation with key stakeholders (including DEC, DPA, DoF). Address the following: 1. comprehensive monitoring of water quality, sediment deposition, and coral condition; 2. best practice dredge procedures; 3. selection of a suitable location for the off-shore spoil ground which demonstrably does not cause impacts on the on the Marine Park; 4. optimum timing of works with respect to sea and meteorological conditions; 5. establishment of conservative 'stop work' trigger levels; 6. identification and temporal definition of key ecological windows when dredging activity will not occur, such as during coral spawning periods; and 7. contingency plans. Further details on the content required in this Plan are provided in schedule 4.			
	Objective To minimise impact of dredging on the marine environment.			
757:M6.6	Evidence Dredge Impact Management Plan. Action Implement the Dredge Impact Management Plan required by Condition 6-5.	Construction	Minister for Environment	In Progress
Marine Impacts		Construction	Willister for Environment	
	How Communicate Legal and Other Requirements to responsible parties (training); Implement an internal audit program involving six monthly audits and Verification Plans for application/review of contractors.			Schedule 4 of the Pluto Ministerial Statement outlines the management intent and key objectives for the DSDMP. The key actions contained in this Plan are those relating to the management of potential turbidity and/or sedimentation impacts on coral communities.
	Objective To minimise impact of dredging on the marine environment.			Evidence of implementation for key turbidity/sedimentation management actions is provided in Appendix 2.
	Evidence Internal audit schedule, audit criteria, and evidence of completion. DEMG minutes.			Where a management action is detailed in a specific Ministerial Condition (e.g. Conditions 6-2 to 6-4 which specify water quality and coral health triggers and management responses), evidence is provided against those conditions in this table and not repeated in Appendix 2.
757:M6.7	Action Make the Dredge Impact Management Plan required by condition 6-5 publicly available in a	Construction	DEC	Completed
Marine Impacts	manner approved by the CEO.			This condition was met during the 2008 reporting period and no further action is required.
	How Dredge Impact Management Plan to be made available in the following locations: - the Local Government Authority (2 copies), Battye Library (2 copies); Karratha Public Library (2 copies); and DEC Library Perth (2 copies - 1 hard copy, 1 cd copy) - Copies also to be freely available for download from the Woodside internet site, (availability and locations of the Dredge Impact Management Plan are to be advertised in the Local newspaper Public Notices).			
	Objective To ensure that the public is kept informed.			
	Evidence Evidence of advertisement of Dredge Impact Management Plan.			
757:M6.8 Marine Impacts	Action Resource a Dredge Environmental Management Group for the duration of the marine works and for such time before and after the marine works so as to carry out its function, to the requirements of the Minister for the Environment.	Overall For the duration of the Marine Works and for such time	Minister for Environment	In Progress The DEMG continued to meet regularly during the reporting period. The meeting frequency was reduced between the completion of the first phase of dredging in 2008 and the commencement of the second phase of
	How The role of the Dredge Environmental Management Group is to provide the Minister for the Environment, the Department of Environment and Conservation and the proponent with advice including, but not limited to: 1. the marine management plans; 2. the marine monitoring programs; 3. the	before and after the marine works so as to carry out its		dredging in 2009. Since the commencement of the second phase of dredging in 2009 DEMG meetings have resumed at a monthly frequency.
	management of turbidity-generating activities and marine works; 4. impacts on marine fluna and flora, including corals; 5. reporting; 6. new management measures and 7. Level 1 and 2 Coral Condition Management Trigger Criteria for Zone C as required in Schedule 3. The membership of the Dredge Environmental Management Group may include: an independent chair appointed by the Minister for the Environment on advice from the CEO, and experts appointed by the Minister for the Environment, and the following may nominate one member each; the Department of Fisheries; the Dampier Port Authority; the Department of Environment and Conservation; and the proponent.	function.		DEMG advice listed as evidence for Conditions 6-2 demonstrates effective DEMG function on the Pluto LNG Project.
	Objective To minimise impact of dredging on the marine environment.			
	Evidence Letters of appointment for the DEMG Chair and members from the Minister for the Environment. DEMG minutes.			

Audit Code	What action must be taken	Project phase	To requirements of	Status: October 2008 – October 2009
Subject	How action must be taken and/or objective of action	When action to be taken	On advice from	
	Objective Evidence that action has been taken	Where it is to be		
757:M6.9 Marine Impacts	Action Prepare and submit to the Department of Environment and Conservation, a scope of Baseline Marine Habitat Survey document to the requirements of the Minister for the Environment. The objective of this document is to specify procedures to quantitatively determine the pre-development baseline distribution, community composition and health of benthic marine habitats (see note below) within the area which may be affected by any works associated with the proposal. Note: "Marine habitats" includes hard and soft coral communities, sponge communities, seagrass and macro-algal communities. How Address the following: 1. survey methods; 2. location and establishment of survey sites; 3. timing and frequency of surveys; 4. habitat classification schemes; 5. treatment of survey data; and 6. mapping methodologies. Objective To determine the baseline distribution, community composition and health of benthic marine habitats within the area. Evidence DEC approval/endorsement of the Scope of Baseline Marine Habitat Survey document. Action Provide an initial report on a detailed survey of coral habitat and communities, and a map showing	Design Prior to commencement of marine works Design	Minister for Environment DEC	Completed This condition was met during the 2008 reporting period and no further action is required. Completed Completed
Compliance Reporting	the general distribution of other benthic habitat types (including soft corals, sponges, algal reef communities) within and adjacent to the area of predicted effects of dredging to the Department of Environment and Conservation at least one month prior to the commencement of dredging. Objective To minimise impact of dredging on the marine environment. Evidence Initial report on detailed survey of coral habitat and communities and map showing general distribution of other benthic habitat types.	Month Prior to dredging construction		This condition was met during the 2008 reporting period and no further action is required.
757:M6.11 Compliance Reporting	Action Conduct a comprehensive field survey, consistent with the approved Scope of Baseline Marine Habitat Survey document, and provide a report of the results to the Department of Environment and Conservation within twelve months following commencement of any marine works associated with the proposal. How This report shall 1. contain spatially accurate (e.g. rectified and geographically referenced) maps showing the locations and spatial extent of the different marine habitat types and percentage cover of each component of their associated benthic communities including corals, macro-algae, non-coral macro-invertebrates and seagrass: 2. record the existing hard and soft corals, macro-algae, non-coral benthic macro invertebrates, seagrass and demersal fish observed within the communities; 3. record the population structure, as size class frequency distributions, and other population statistics, such as recruitment, survival and growth, of key hard coral species; 4. evaluate baseline pre-development health of the benthic communities at representative survey sites; and 5. include data provided in an appropriate GIS data set format. Objective To minimise impact of dredging on the marine environment. Evidence Report on the results of the comprehensive field survey that is consistent with the Scope of Baseline Marine Habitat Survey document.	Construction Within 12 months of commencement of dredging works	DEC	Completed The final report to address specific requirements of Condition 6-11 was submitted to DEC on 21 November 2008 (WBPL ref: PLU/GOV/00154). DEC acknowledged receipt of the report on 25 November 2008 (DEC reference: DEC0652-04).
757:M6.12 Compliance Reporting	Action Within three months following completion of the marine works, repeat the Comprehensive Field Survey required by condition 6-11, and submit a report on the results of that survey to the Department of Environment and Conservation. This will constitute the first Post-Dredging Marine Habitat Survey, reporting any changes which may have occurred between the Baseline Marine Habitat Survey and the first Post-Dredging Marine Habitat Survey. Objective To minimise impact of dredging on the marine environment. Evidence See M6.14.	Post-construction Within 3 months of dredging completion	DEC	Not applicable for 2008-2009 reporting period Condition not applicable during the reporting period.
757:M6.13 Marine Impacts	Action Repeat the Post-Dredging Marine Habitat Survey referred to in condition 6-12, at the same time of the year annually for three years, or until such time, as determined by the Minister for the Environment on advice of the Department of Environment and Conservation and the Department of Fisheries. How A Post-Dredging Marine Habitat Survey shall be constructed in accordance with the approved Scope of Baseline Habitat Survey. Objective To minimise impact of dredging on the marine environment. Evidence See M6.14.	Post-construction At the same time of the year annually for 3 years, or until such time as determined by the Minister for Environment	Minister for Environment	Not applicable for 2008-2009 reporting period Condition not applicable during the reporting period.

Audit Code	What action must be taken	Project phase	To requirements of	Status: October 2008 – October 2009
Subject	How action must be taken and/or objective of action	When action to be	On advice from	Status. October 2006 – October 2009
	Objective Evidence that action has been taken	taken		
		Where it is to be taken		
757:M6.14 Compliance	Action Within three months following completion of each of the surveys required by conditions 6-12 and 6-13, the proponent shall report the findings of each of the surveys to the Department of Environment and	Post-construction Within 3 months of	DEC	Not applicable for 2008-2009 reporting period
Reporting		dredging completion and annually for a		Condition not applicable during the reporting period.
	Objective To report progress of subsequent surveys.	following 3 years		
	Evidence 1) Findings of Post-Dredging Marine Habitat Survey initially at least 3 months following completion of marine works, then 2) Within three months following completion of each of the surveys required under condition 6-13.			
757:M7.1 Deepwater Marine	Action If a marine wastewater discharge is required by the proponent, the proponent shall construct the associated infrastructure so that wastewater is discharged into water of depth greater than 30 meters	Overall	Minister for Environment	Completed
Outfall	outside the Dampier Archipelago, unless otherwise determined by the CEO under Part V of the Act.			The Marine Treated Wastewater Discharge Management Plan was approved by the DEC in 18 March 2009 (DEC reference: DEC 4776). Refer status of compliance with 757:M7.2.
	How A Marine Treated Wastewater Discharge Management Plan will be developed and the appropriate infrastructure constructed to			Works Approval W4466/2008/1 for the Pluto LNG Project effluent treatment plant was issued on 3 September
	Accommodate waste water discharge.			2009, which approves disposal of treated waste water from the facility via the Water Corporation Multi-User
	Objective To minimise the environmental impact associated with wastewater discharge.			Brine Line. The effluent treatment plant commenced construction during the reporting period and will commence commissioning in 2010.
	Evidence DEC Works Approval - if Marine Wastewater discharge is required, evidence that wastewater			
757:M7.2	discharge structure is discharging into water of depth greater than 30 metres. Action Prior to construction of the wastewater treatment plant or the marine outfall, whichever is the sooner, the proponent, in consultation with the Department of Environment and Conservation, shall prepare a Marine Treated Wastewater Discharge Management Plan to the requirements of the Minister for	Design	Minister for Environment	Completed
Deepwater Marine Outfall			EPA, DEC	The Marine Treated Wastewater Discharge Management Plan was approved by the DEC in 18 March 2009
	the Environment on advice of the Environmental Protection Authority.			(DEC reference: DEC 4776).
	How Address the following: 1. determination of the effect of wastewater flow rate on the number of dilutions the diffuser is predicted to achieve within the zone of initial dilution at maximum flow rate; 2.			
	setting of environmental values, environmental quality objectives and levels of ecological protection to be			
	achieved around the outfall; 3. identification of a range of feasible and practical management options and			
	the environmental quality indicators and associated "trigger" levels for the implementation of remedial, management and/or preventative actions to protect the water quality and the marine environment based			
	on the guidelines and recommended approaches in ANZECC/ARMCANZ (2000); 4. Whole Effluent			
	Toxicity (WET) testing of wastewater, consistent with ANZECC requirements, and addressing the items in schedule 5 (attached); 5. redesign and incorporation of a new diffuser, including timelines, in the event			
	that the WET testing results show that the original wastewater diffuser is not achieving sufficient dilutions			
	to meet a high level of ecological protection at the edge of the mixing zone; 6. verification of diffuser			
	performance in terms of achieving the required number of initial dilutions under low energy/calm meteorological and sea-state conditions to achieve a high level of ecosystem protection (99% species			
	protection) at the edge of the approved mixing zone; 7. A monitoring program to permit determination of			
	whether the water quality objectives are being met; and 8. Protocols and schedules for reporting performance against the Environmental Quality Objectives using the environmental quality trigger levels.			
	Objective The objective of this Plan is to ensure that the discharge of treated wastewater is managed to achieve simultaneously the following Environmental Quality Objectives as described in the document,			
	Pilbara Coastal Water Quality Consultation Outcomes: Environmental Values and Environmental Quality			
	Objectives (Department of Environment, March 2006): Maintenance of ecosystem integrity with spatially-			
	assigned levels of protection; Maintenance of aquatic life for human consumption assigned to all parts of the marine environment surrounding the ocean outlet; Maintenance of primary contact recreation values			
	assigned to all parts of the marine environment surrounding the ocean outlet; Maintenance of secondary			
	contact recreation values assigned to all parts of the marine environment surrounding the ocean outlet;			
	Maintenance of aesthetic values assigned to all parts of the marine environment surrounding the ocean outlet; Maintenance of cultural and spiritual values assigned to all parts of the marine environment			
	surrounding the ocean outlet; and Maintenance of Industrial Water Supply.			
757:M7.3 Deepwater Marine	Evidence Marine Treated Wastewater Discharge Management Plan. Action Implement the Marine Treated Wastewater Discharge Management Plan required by condition 7-2.	Operation	Minister for Environment	In Progress
Outfall	Objective To minimise environmental impacts and apply relevant technology to the project.			Works Approval W4466/2008/1 for the Pluto LNG Project effluent treatment plant was issued on 3 September 2009, which approves disposal of treated waste water from the facility via the Water Corporation Multi-User
	Evidence Pluto LNG Project Ministerial Statement 757 Compliance Report 2009.			Brine Line. The effluent treatment plant commenced construction during the reporting period and will commence commissioning in 2010.

Audit Code	What action must be taken	Project phase	To requirements of	Status: October 2008 – October 2009
Subject	How action must be taken and/or objective of action Objective	When action to be taken	On advice from	
	• Evidence that action has been taken	Where it is to be taken		
757:M7.4 Deepwater Marine	Action Make the Marine Treated Wastewater Discharge Management Plan required by condition 7-2 publicly available.	Construction Construction	Minister for Environment	Completed
Outfall	How Marine Treated Wastewater Discharge Management Plan to be made available in the following			The Marine Treated Waste Water Discharge Management Plan is publically available on the Woodside internet site: (http://www.woodside.com.au/NR/rdonlyres/2806179C-A20D-491E-99E9-
	locations: - the Local Government Authority (2 copies), Battye Library (2 copies); Karratha Public Library (2 copies); and DEC Library Perth (1 hard copy, 1 cd copy) - Copies also to be freely available for			BDB567161B3D/0/MarineTreatedWastewaterDischargeManagementPlan.pdf).
	download from the Woodside internet site, (availability and locations of Marine Treated Wastewater Discharge Management Plan are to be advertised in the Local newspaper Public Notices).			The Marine Treated Waste Water Discharge Management Plan will be made available in the required locations and on the Woodside internet site. Verification of appropriate distribution will be provided to DEC in
	Objective To ensure the public is kept informed.			the Pluto LNG Project Ministerial Statement 757 Compliance Report 2010.
	Evidence Copy of advertisement of Marine Treated Wastewater Discharge Management Plan.			
757:M7.5 Deepwater Marine	Action Prior to submitting a Works Approval application for the wastewater treatment plant 1. characterise in detail the physical and chemical composition and flow rates of all wastewater streams within the site	Design Prior to submitting a	Minister for Environment	Completed
Outfall	and, using the toxicity of mixtures principles, predict the theoretical toxicity of the combined wastewater after treatment; 2. Determine, for all contaminants and nutrients, the total annual loads of contaminants	Works Approval application for the		These aspects were covered in the Marine Treated Wastewater Discharge Management Plan, which was approved by the DEC on 18 March 2009 (DEC reference: DEC 4776).
	and nutrients in the wastewater discharge exiting the site; and 3. Determine, for normal and worst-case conditions, the concentrations of contaminants and nutrients (for agreed averaging periods) in the	wastewater treatment plant		
	wastewater discharge exiting the site.			
	Objective To minimise the environmental impact associated with wastewater discharge.			
757:M7.6	Evidence Approval from DEC of MTWDMP. Action Prior to submitting a Works Approval application for the wastewater treatment plant, demonstrate	Design	Minister for Environment	Completed
Deepwater Marine Outfall	that the wastewater discharge will meet "best practicable technology" and waste minimisation principles for contaminants and nutrients.	Prior to submitting a Works Approval		These aspects were covered in the Marine Treated Wastewater Discharge Management Plan, which was
	How A review of current Best Environmental Practice (BEP) will be conducted to ensure that the most up	Application for the Wastewater Treatment Plant.		approved by the DEC on 18 March 2009 (DEC reference: DEC 4776).
	to date technology is being utilised. This review will be outlined in the Marine Treated Waste Water Discharge Management Plan.	Treatment Plant.		
	Objective To demonstrate best practice in wastewater treatment and discharge.			
757:M7.7:1	Evidence Approval from DEC of MTWDMP, Works Approval granted from DEC. Action Prior to submitting a Works Approval application for the wastewater treatment plant, design, and	Design	DEC	Completed
Deepwater Marine Outfall	subsequently operate, plant and equipment on the site such that: 1. the contaminant concentrations in the wastewater effluent from the site, just prior to entry to the wastewater discharge system, meet (in order of			These aspects were covered in the Marine Treated Wastewater Discharge Management Plan, which was
	preference): the ANZECC/ARMCANZ (2000) 99% species protection level: or the ANZECC/ARMCANZ (2000) 99% species protection level at the edge of an approved mixing zone; 2. The concentrations of			approved by the DEC on 18 March 2009 (DEC reference: DEC 4776).
	contaminants in the wastewater effluent which can potentially bio-accumulate/bio-concentrate meet the ANZECC/ARMCANZ (2000) 80% species protection trigger levels just prior to entry into the wastewater			
	discharge system; and 3. Mass balances and inventories of toxicants can be maintained throughout the life of the plant so that their fate can be traced.			
	How The proponent shall demonstrate that the proposed discharge meets the Ministerial Condition 7-7 via modelling. This will be outlined in the Marine Treated Wastewater Discharge Management Plan.			
	Objective To minimise the environmental impact associated with wastewater discharge.			
	Evidence Approval from DEC of MTWDMP.			
757:M7.7:2 Deepwater Marine	Action Operate the Wastewater Treatment Plant such that: 1. the contaminant concentrations in the wastewater effluent from the site, just prior to entry to the wastewater discharge system, meet (in order of	Operation	DEC	Not applicable for 2008-2009 reporting period
Outfall	preference): the ANZECC/ARMCANZ (2000) 99% species protection level: or the ANZECC/ARMCANZ (2000) 99% species protection level at the edge of an approved mixing zone; 2. The concentrations of			Condition not applicable - Wastewater treatment plant is not yet operational.
	contaminants in the wastewater effluent which can potentially bio-accumulate/bio-concentrate meet the ANZECC/ARMCANZ (2000) 80% species protection trigger levels just prior to entry into the wastewater			
	discharge system; and 3. Mass balances and inventories of toxicants can be maintained throughout the life of the plant so that their fate can be traced.			
	Evidence Pluto LNG Project Ministerial Statement 757 Compliance Report 2009.			
757:M7.8 Compliance	Action Within three months following commissioning and stabilising of plant operations, conduct an analysis of effluent properties and contaminant concentrations, to an analytical limit of reporting agreed by	Operation Within 3 months	DEC	Not applicable for 2008-2009 reporting period
Reporting	the Department of Environment and Conservation, demonstrating that they are substantially consistent with predictions.	following commissioning		Condition not applicable – Report will be conducted within 3 months following commissioning.
	How A Report will be prepared on the analysis of effluent properties and contaminant concentrations in consultation with DEC.			
	<u>Objective</u> To demonstrate that Woodside waste water concentrations are substantially consistent with predictions.			
	Evidence Effluent characterisation report.			

Audit Code Subject	What action must be taken How action must be taken and/or objective of action Objective Evidence that action has been taken	 Project phase When action to be taken Where it is to be taken 	To requirements of On advice from	Status: October 2008 – October 2009
757:M7.9 Deepwater Marine Outfall	Action Develop a Contingency Wastewater Management Plan which considers alternate options for wastewater disposal in the event that the Environmental Quality Objectives are not met as determined through Whole Effluent Toxicity testing, diffuser performance monitoring or environmental quality monitoring, to the requirements of the Minister for the Environment. How Alternative waste management plan will be designed. Objective To anticipate impacts and manage those which are unforeseen. Evidence Contingency Wastewater Management Plan.	Construction During Construction	Minister for Environment	In Progress The framework for the Contingency Waste Water Management Plan was included within the Marine Treated Waste Water Discharge Management Plan, which was approved by the DEC on 18 March 2009 (DEC reference: DEC 4776). Additional detail will be provided in a separate plan prior to operations. Commissioning discharges and contingencies, prior to WET testing, will be covered under the commissioning plan required as a condition of the Part V licence.
757:M7.10 Deepwater Marine Outfall	Action In the event that the treatment plant malfunctions or goes off-line, the proponent shall include within the Contingency Wastewater Management Plan required by condition 7-9 alternative options for wastewater disposal to the timing and other requirements of the Minister for the Environment. How Practices will be changed to the methods of the Contingency Waste Management Plan. Objective Preparation for contingency events. Evidence Contingency Wastewater Management Plan.	Construction During Construction	Minister for Environment	Not applicable for 2008-2009 reporting period Condition not applicable – CWMP not required until the wastewater treatment plant is operating, following commissioning.
757:M7.11 Deepwater Marine Outfall	Action In the event that the Environmental Quality Objectives are not being met, the proponent shall implement the Contingency Wastewater Management Plan required by condition 7-9. How Action will be taken from Contingency Wastewater Management Plan. Objective Preparation for contingency events. Evidence Pluto LNG Project Ministerial Statement 757 Compliance Report - Report on alternate action to the DEC.	Operation	Minister for Environment	Not applicable for 2008-2009 reporting period Condition not applicable – CWMP not required until the wastewater treatment plant is operating, following commissioning.
757:M7.12 Deepwater Marine Outfall	Action Review and revise the Contingency Wastewater Management Plan required by condition 7-9, as and when directed by the CEO. Objective Preparation for contingency events. Evidence Revised Contingency Wastewater Management Plan (if required).	Operation	DEC	Not applicable for 2008-2009 reporting period Condition not applicable – CWMP not required until the wastewater treatment plant is operating, following commissioning.
757:M7.13 Deepwater Marine Outfall	Action Make any revisions of the Contingency Wastewater Management Plan, as required by condition 7-12, publicly available in a manner approved by the CEO. How Revisions of the Contingency Wastewater Management Plan to be made available in the following locations: - the Local Government Authority (2 copies), Battye Library (2 copies); Karratha Public Library (2 copies); and DEC Library Perth (1 hard copy, 1 cd copy) - Copies also to be freely available for download from the Woodside internet site, (availability and locations of revisions of Contingency Wastewater Management Plan are to be advertised in the Local newspaper Public Notices). Objective To ensure that the public is kept informed.	Operation Ongoing	DEC	Not applicable for 2008-2009 reporting period Condition not applicable – CWMP not required until the wastewater treatment plant is operating, following commissioning.
757:M8.1 Marine Quarantine	Evidence Evidence that the plan has been made publicly available as required. Action Prior to commencement of dredging, prepare and implement a Marine Quarantine Management Plan, to the requirements of the Minister for the Environment. Objective To prevent marine pest introduction to the waters adjacent to the proposal. Evidence Marine Quarantine Management Plan developed in consultation with DoF and DEC.	Design Before dredging	Minister for Environment EPA	In Progress The Marine Quarantine Management Plan was initially submitted to DEC on 7 November 2007 (WBPL ref: PLU/GOV/000147) following consultation with the DoF and DEC. DEC approved the plan for dredging activities on 21 November 2007. A revision of the plan is required prior to operation of the LNG facility, currently planned for late 2010. Marine Quarantine Management Plan has been implemented for all dredge vessels and dredging related vessels and equipment associated with the Pluto LNG Project. Refer to Condition 8.2 for evidence of MQMP implementation.

Audit Code	What action must be taken	Project phase	To requirements of	Status: October 2008 – October 2009
• Subject	How action must be taken and/or objective of action	When action to be	On advice from	
	• Objective	taken		
	Evidence that action has been taken	Where it is to be taken		
757:M8.2 Marine Quarantine		Construction	Minister for Environment DEC	In Progress
				All dredging related vessels and equipment utilised have been assessed in accordance with the procedures specified in the approved Marine Quarantine Management Plan (MQMP).
	the vessel at the point of departure for the Port of Dampier immediately prior to departure; or c) a risk assessment based on the history of the vessel, its characteristics and use during the implementation of the proposal, to the requirements of the Minister for the Environment on advice of the Environmental			A total of 2 dredges and their associated equipment mobilised in 2009 and have been assessed in accordance with the MQMP. These are listed below:
	Protection Authority.			 Nile River (Trailer Suction Hopper Dredge); Queen of the Netherlands (Trailer Suction Hopper Dredge).
	Objective To prevent marine pest introduction. Evidence See condition 8-4.			No invasive marine species have been identified and all vessels have been assessed as 'low risk' by the Department of Fisheries (DoF).
				A register of compliance reporting correspondence that documents the assessment and clearance process for these vessels is provided in Appendix 5.
757:M8.3 Marine Quarantine	Action Prior to commencement of operations develop and implement an appropriate protocol for inspection and clearance of vessels during the operational phase of the proposal.	Construction During Construction	DEC	Not applicable for 2008-2009 reporting period
	Objective To prevent marine pest introduction	3		Condition not applicable – Operations Marine Quarantine Management Protocol will be completed prior to operations in 2010.
	Evidence An Operations Marine Quarantine Management Protocol developed in consultation with and approved by DoF and DEC.			
757:M8.4 Compliance	Action Prior to the commencement of dredging, the proponent shall report to the Department of Environment and Conservation on the results of the inspection referred to in Condition 8-2.	Design Prior to	DEC DoF, AQIS	In Progress
Reporting	How Inspections of vessels originating from outside of State waters will be reported to DEC within 48h through the process specified in the Marine Quarantine Management Plan.	commencement of dredging	Doi , rigio	Please refer to 757:M8.2.
	Objective To prevent marine pest introduction.			
	Evidence Inspection report.			
757:M8.5 Marine Quarantine	Action Manage any sediment or fouling organisms found as a consequence of the inspection required by condition 8-2, to the timing and other requirements of the Minister for the Environment.	Construction	Minister for Environment DoF	In Progress
	How The Marine Pest Management Strategy (Contingency) specified in the Marine Quarantine Management Plan will be implemented in the event that a Marine Species of Concern is identified during an arrival inspection.			No introduced marine pests have been identified on Pluto dredging related vessels and equipment to date.
	Objective Minimise environmental impacts associated with potential marine pest introduction.			
	Evidence Marine Pest Management Strategy specified in the Marine Quarantine Management Plan approved by DoF and DEC; Communication with DoF and DEC in the event a marine species of concern is identified. Infestation survey plans approved by DoF.			
757:M8.6 Marine Quarantine	Action If following the completion of dredging and disposal activities, the dredging equipment is to be transferred to another location within Western Australia's territorial waters, undertake an investigation	Construction	Minister for Environment DoF, AQIS	In Progress
Walling Qualuming	employing an appropriately qualified marine scientist to identify the presence of/the potential for introduced marine pests, to the requirements of the Minister for the Environment.		DOF, AQIS	No dredging vessels have required departure inspections to date as vessel destinations have all been outside Western Australia:
	Objective To prevent pest contamination of other Australian Ports.			The BHD 'Hippopotes' departed for Indonesia on 2 March 2009 following the completion of its scope of work as outlined in correspondence provided to the DoF and DEC on 25 February 2009 WBPL ref:
	Evidence If required, Investigation reports prepared by a suitably qualified marine scientist for all dredging related vessels and equipment that are to be transferred to another location within WA territorial waters.			PLU/GOV/00424). The TSHD 'Nile River' departed for Taiwan on 7 May 2009 following the completion of Pluto Trunkline
				Dredging works as outlined in correspondence to the DoF and DEC on 4 May 2008 (WBPL ref: PLU/GOV/00388).
				The TSHD 'Queen of the Netherlands' currently remains in Dampier Port working on the Pluto LNG Project.
757:M8.7 Compliance	Action In the event that any introduced marine pests are detected (see condition 8-5), the proponent shall put in place a Marine Pests Management Strategy to ensure that introduced marine pests are not	Construction	Minister for Environment DoF, AQIS	In Progress
Reporting	transferred to other locations within Western Australia's territorial waters, to the requirements of the Minister for the Environment. Note: In the preparation of the report required by condition 8-4, and in the development of any actions required by conditions 8-4 to 8-6, the Environmental Protection Authority expects that advice of the following agencies will be obtained: Department of Fisheries; and Australian Quarantine Inspection Service.			No introduced marine pests have been detected to date. Refer to 757:M8.2 for additional information.
	Objective Minimise environmental impacts associated with potential marine pest introduction to other locations in Western Australia's territorial waters.			
	Evidence If required, Marine Pest Management Strategy specified in the Marine Quarantine Management Plan.			

Audit CodeSubject	What action must be taken How action must be taken and/or objective of action	Project phaseWhen action to be	To requirements ofOn advice from	Status: October 2008 – October 2009
	• Objective	taken		
	Evidence that action has been taken	Where it is to be taken		
757:M8.8	Action For the life of the project, notify the Department of Environment and Conservation, the Department	Overall	DEC, DoF, DPA	In Progress
Compliance Reporting	of Fisheries and the Dampier Port Authority of any non-indigenous species detected in the waters adjacent to the project within 24 hours following detection.	Within 24 hours of detection		No introduced marine pests have been detected. Refer to 757:M8.2 for additional information.
	Objective To keep DEC, DPA and DoF informed.			
757.140.0.4	Evidence Notification reports of any non-indigenous species detected in waters adjacent to the project		A	
757:M8.9:1 Marine Quarantine	Action In the event that non-indigenous species introduced by the proponent are detected during dredging, the proponent shall take immediate action to prevent establishment and proliferation and shall take action to control and eradicate them to the requirements of the Minister for the Environment.	Construction	Minister for Environment	In Progress No introduced marine pests have been detected. Refer to 757:M8.2 for additional information.
	Objective To prevent infestation of pest species.			
	Evidence Immediate notifications to DoF, DEC and DPA; Report actions to prevent establishment and proliferation of non-indigenous species and action to control and eradicate them.			
757:M8.9:2 Marine Quarantine	Action In the event that non-indigenous species introduced by the proponent are detected during	Operation	Minister for Environment	In Progress
Manne Quarantine	operation, the proponent shall take immediate action to prevent establishment and proliferation and shall take action to control and eradicate them to the requirements of the Minister for the Environment.			No introduced marine pests have been detected. Refer to 757:M8.2 for additional information.
	Objective To prevent infestation of pest species.			
	Evidence Immediate notifications to DoF, DEC and DPA. Report actions to prevent establishment and proliferation of non-indigenous species and action to control and eradicate them.			
757:M9.1 Turtle Management	Action Prepare a Turtle Management Plan. This Plan shall: 1. identify project-related stressors, causes of environmental impacts and potential consequences for marine turtles (including impact of noise, vibration,	Design Prior to	Minister for Environment DEC	Completed The Construction Management Plan (CTMP) was substitted to PEC on 05 Contember 2007 (MPP) and
and Monitoring	light overspill and glow, vessel strike, and changes to coastal processes); and 2. Identify and demonstrate the effectiveness of proposed management measures to mitigate [as defined in Environmental Protection Authority Guidance Statement 9] project-related impacts and consequences for marine turtles.	commencement of works		The Sea Turtle Management Plan (STMP) was submitted to DEC on 25 September 2007 (WBPL ref: PLU/GOV/00135) and approved on 8 October 2007.
	How This Plan shall: 1. identify project-related stressors, causes of environmental impacts and potential consequences for marine turtles (including impact of noise, vibration, light overspill and glow, vessel strike, and changes to coastal processes); and 2. Identify and demonstrate the effectiveness of proposed			The approval of the STMP was conditional upon submission of additional information regarding the lighting and operational phases of the Pluto development. The Operational Lighting Protocol was submitted to DEC on 4 April 2008 and was approved on 7 November 2008.
	management measures to mitigate [as defined in Environmental Protection Authority Guidance Statement 9] project-related impacts and consequences for marine turtles.			
	Objective To provide a management framework to enable the proponent to manage the project so as to detect and mitigate as necessary ["mitigate" as defined in Environmental Protection Authority Guidance Statement 9] any impact upon marine turtles from the project and to identify darkness strategies to reduce as far as possible lights or light glow interfering with nesting female turtles and hatchlings.			
757:M9.2	Evidence See Turtle Management Plan. Action Implement the Turtle Management Plan required by condition 9-1.	Overall	Minister for Environment	In Progress
Turtle Management and Monitoring	How Communicate Legal and Other Requirements to responsible parties (training); Implement an internal audit program involving six monthly audits and Verification Plans for application/review of contractors.			Appendix 2 outlines compliance with key actions contained in the Sea Turtle Management Plan.
	Objective To minimise environmental impacts and apply relevant technology to the project.			As required by the Sea Turtle Management Plan, Woodside continues to engage an Independent Fauna Observer (IFO) to conduct fauna observer training and ongoing assessments of mitigation activities for
	Evidence Internal audit schedule, audit criteria, and evidence of completion. DEMG minutes. IFO report.			potential impacts on marine fauna associated with the Pluto Dredging Program fortnightly during the turtle nesting season (November to April).
757:M9.3	Action Make the Turtle Management Plan required by condition 9-1 publicly available in a manner	Construction	DEC	Completed
Turtle Management and Monitoring	approved by the CEO.			This condition was met during the 2008 reporting period and no further action is required.
	How Turtle Management Plan to be made available in the following locations: - the Local Government Authority (2 copies), Battye Library (2 copies); Karratha Public Library (2 copies); and DEC Library Perth (1 hard copy, 1 cd copy) - Copies also to be freely available for download from the Woodside internet site, (availability and locations of plan are to be advertised in the Local newspaper Public Notices).			
	Objective To ensure public is kept informed.			
	Evidence Evidence of advertisement of Turtle Management Plan.			
757:M9.4 Turtle Management	Action Review the Turtle Management Plan required by condition 9-1 annually to the requirements of the Minister for the Environment.	Overall Annually	Minister for Environment	In Progress
and Monitoring	Objective To minimise environmental impacts on turtles.			The Sea Turtle Management Plan was reviewed continuously through Phase 1 of the dredging programme. DEC was consulted during the review process as detailed in correspondence dated 7 May 2008 (WBPL ref: PLU/GOV/00241). Following this review, Revision 9 of Sea Turtle Management Plan was approved on 7
	Evidence Report outcomes of review in Annual compliance report.			November 2008. A further review, utilising an independent turtle specialist, is planned for late November 2009.

Audit Code	What action must be taken	Project phase	To requirements of	Status: October 2008 – October 2009
• Subject	How action must be taken and/or objective of action	When action to be	On advice from	
	Objective Evidence that action has been taken	Where it is to be		
		taken		
757:M9.5 Compliance	Action Report any mortality of marine turtles or other threatened or specially protected marine fauna to the Department of Environment and Conservation within 24 hours following observation.	Overall Within 24 hours of an	DEC	In Progress
Reporting	Objective To keep DEC informed on project progress and issues.	incident		No mortality of marine turtles has occurred as a result of the project within the reporting period.
	Evidence Incident reports as per Appendix D of the STMP.			
757:M10.1	Action Prepare, in liaison with the Department of Indigenous Affairs, and submit to the Department of	Design	DEC	Completed
Indigenous Heritage	Environment and Conservation, a Cultural Heritage Management Plan.	Prior to ground- disturbing activities	DIA	Cultural Heritage Management Plans (CHMP) submitted to Department of Indigenous Affairs (DIA), the
	How This Plan shall address: 1. the inclusion of cultural heritage awareness training in the workforce induction; 2. the signposting and fencing of nearby heritage sites to prevent unauthorised access; 3. the			Museum and the Department of Environment and Conservation for comment. Woodside provided Ngarluma, Injibarndi, Yaburarra, Mardudhunera and Wong-Goo-Tt-Oo groups with opportunities to comment in late 2006
	monitoring of ground-disturbing activities by an anthropologist/archaeologist and representatives of the			and in mid 2007 and 2008. Responses were incorporated into the CHMPs.
	Traditional Custodians; and 4. the retrieval and relocation of heritage material which lies within the disturbance footprint in consultation with the Traditional Custodians.			
	Objective To minimise impact on cultural heritage.			
	Evidence Cultural Heritage Management Plan. (CHMP) Correspondence seeking Department of			
757 1440 0	Indigenous Affairs advice.	Overell	Minister for Engineering	In Programme
757:M10.2 Indigenous Heritage	Action Implement the Cultural Heritage Management Plan required by Condition 10-1.	Overall	Minister for Environment	In Progress
	<u>How.</u> Implementation will take place through inductions monitoring and ongoing Site B Heritage Audits as outlined in Cultural Heritage Management Plan.			Site A – Letters from DIA confirming compliance, received 28 December 2007 and 6 November 2009.
	Objective To prevent unnecessary impacts.			Site B – Independent consultant Australian Cultural Heritage Management (ACHM) provided advice confirming compliance of cultural heritage requirements, within Site B in April 2008. ACHM Compliance Conformation report can be provided to DEC if requested.
	Evidence Site A – letter from DIA confirming compliance. Site B – independent consultant report			Comonnation report can be provided to DEC if requested.
757:M10.3	confirming compliance. <u>Action</u> Make the Cultural Heritage Management Plan required by condition 10-1 publicly available.	Construction	DEC	Completed
Indigenous Heritage	How Cultural Heritage Management Plan to be made available in the following locations: - the Local			This condition was met during the 2008 reporting period and no further action is required.
	Government Authority (2 copies), Battye Library (2 copies); Karratha Public Library (2 copies); and DEC Library Perth (2 copies - 1 hard copy, 1 cd copy) - Copies also to be freely available for download from the Woodside internet site, (availability and locations of plan are to be advertised in the Local newspaper Public Notices).			
	Objective To ensure that the public is kept informed.			
	Evidence CHMP's made available to the public on internet. Local Aboriginal groups provided with hard copy.			
757:M11.1	Action Prior to submitting a Works Approval application for the plant, submit a detailed Front End	Design	Minister for Environment	Completed
Compliance Reporting	Engineering Design Report demonstrating that the proposed works adopt best practice pollution control measures to minimise emissions from the plant.	Prior to submitting a Works Approval	EPA	This condition was met during the 2008 reporting period and no further action is required.
		Application for the		3
	<u>How.</u> This report shall: 1. set out the base emissions rates for major sources for the plant and the design emission targets; and 2. address normal operations, shut-down, start-up, and equipment failure conditions.	plant.		
	Objective To ensure best practice is applied to minimising air emissions.			
	Evidence Front End Engineering Design Report.			
757:M11.2	Action At least three months prior to commencement of operations prepare an Air Quality Management	Construction	Minister for Environment	Not applicable for 2008-2009 reporting period
Air Emissions	Plan.	At least 3 months prior to the		The Air Quality Management Plan will be submitted in 2010 at least 3 months prior to commencement of Pluto
	How This plan shall include: 1. cumulative air quality modelling which uses data from the Front End	commencement of		LNG Project Operations.
	Engineering Design Report and includes emissions from approved industrial sources at Cape Preston and	operations		
	Barrow Island; 2. proposed targets and standards; 3. an emissions monitoring programme, which includes nitrogen compounds, butene, toluene, ethylene, xylene, ozone, acrylene and hydrogen sulphide emissions			
	from the plant; 4. an ambient air monitoring programme and a nitrogen deposition monitoring programme;			
	and 5. annual reporting.			
757.144.0	Evidence Air Quality Management Plan.	Onenation	Minister for Englished	Net applicable for 2000 2000 reporting period
757:M11.3 Air emissions	Action Implement the Air Quality Management Plan required by Condition 11-2.	Operation Operation	Minister for Environment	Not applicable for 2008-2009 reporting period
	Objective To minimise environmental impacts associated with air emissions.	,		The Air Quality Management Plan will be submitted in 2010 at least 3 months prior to commencement of Pluto LNG Project Operations.
	Evidence Annual Compliance Report.			Erro i rojou oporations.

Audit Code	What action must be taken	Project phase	• To requirements of	Status: October 2008 – October 2009
Subject	How action must be taken and/or objective of action Objective	When action to be taken	On advice from	
	Objective Evidence that action has been taken	Where it is to be		
757:M11.4	Action Make the Air Quality Management Plan required by condition 11-2 publicly available.	taken Construction	DEC	Not applicable for 2008-2009 reporting period
Air Emissions	How Air Quality Management Plan to be made available in the following locations: - the Local Government Authority (2 copies), Battye Library (2 copies); Karratha Public Library (2 copies); and DEC Library Perth (2 copies - 1 hard copy, 1 cd copy) - Copies also to be freely available for download from the Woodside internet site, (availability and locations of the Air Emissions Management Plan are to be advertised in the Local newspaper Public Notices).			The Air Quality Management Plan will be submitted in 2010 at least 3 months prior to commencement of Pluto LNG Project Operations.
	Objective To keep public informed.			
757:M12.1	Evidence Copy of advertisement of Air Quality Management Plan. Action Develop a Greenhouse Gas Abatement Program: to ensure that the plant is designed and	Dogigo	Minister for Environment	Completed
Greenhouse Gas Abatement	operated in a manner which achieves reductions in "greenhouse gas" emissions as far as practicable; to provide for ongoing 'greenhouse gas' emissions reductions over time; to ensure that through the use of best practice, the total net "greenhouse gas" emissions and/or "greenhouse gas" emissions per unit of product from the project are minimised; and to manage "greenhouse gas" emissions in accordance with the Framework Convention on Climate Change 1992, and consistent with the National Greenhouse Strategy.	Design Prior to commencement of construction of plant	EPA	Completed This condition was met during the 2008 reporting period and no further action is required.
	How. This Program shall include: 1. calculation of the "greenhouse gas" emissions associated with the proposal, as advised by the Environmental Protection Authority; Note: The current requirements of the Environmental Protection Authority are set out in: Minimising Greenhouse Gas Emissions, Guidance for the Assessment of Environmental Factors, No 12 published by the Environmental Protection Authority (October 2002). This document may be updated or replaced from time to time. 2. Specific measures to minimise the total net "greenhouse gas" emissions and/or the "greenhouse gas" emissions per unit of product associated with the proposal using a combination of "no regrets" and "beyond no regrets" measures; 3. The implementation and ongoing review of "greenhouse gas" offset strategies with such offsets to remain in place for the life of the proposal; 4. Estimation of the "greenhouse gas" efficiency of the project (per unit of product and/or other agreed performance indicators) and comparison with the efficiencies of other comparable projects producing a similar product, both within Australia and overseas. 5. Implementation of thermal efficiency design and operating goals consistent with the Australian Greenhouse Office Technical Efficiency guidelines in design and operational management. 6. Actions for the monitoring, regular auditing and annual reporting of "greenhouse gas" emissions and emission reduction strategies. 7. a target set by the proponent for the progressive reduction of total net "greenhouse gas" emissions over time, and annual reporting of progress made in achieving this target. Consideration should be given to the use of renewable energy sources such as solar, wind or hydro power. 8. A program to achieve reduction in "greenhouse gas" emissions, consistent with the target referred to in (7) above. 9. entry, whether on a project-specific basis, company-wide arrangement or within an industrial grouping, as appropriate, into the Commonwealth Government's "Greenhouse Challenge" voluntary cooperative agreem			
757:M12.2	Evidence Greenhouse Gas Abatement program. Action For the life of the project, the proponent shall provide a greenhouse gas offset package which, as	Overall	Minister for Environment	In Progress
Greenhouse Gas Abatement	a minimum, offsets the reservoir carbon dioxide released to the atmosphere. Objective To minimise Greenhouse gas emissions.	Ongoing	WILLISTER TOLE ETIMIOUTHERIC	Reservoir CO ₂ offset obligations are currently being met via a contract with CO ₂ Australia. This contract requires CO ₂ Australia, on behalf of the Pluto LNG Project, to implement biosequestration of an equivalent
	Evidence Formal agreement to provide offsets.			quantity of CO ₂ emissions to that expected to be released through venting of reservoir CO ₂ from the foundation development.
757:M12.3	Action Implement the Greenhouse Gas Abatement Program required by condition 12-1.	Construction	Minister for Environment	In Progress
Greenhouse Gas Abatement	Objective To minimise Greenhouse gas emissions. Evidence Pluto LNG Project Ministerial Statement 757 Compliance Report 2009.			The Greenhouse Gas Abatement Program details the design and operational aspects of the project related to minimisation of the overall greenhouse footprint. This includes design initiatives to minimise greenhouse emissions and contractual arrangements to offset emissions through other means. Reservoir CO ₂ offset obligations and discharge means are detailed against M12.2. Requirements relating to selection of technology are incorporated into the design of the plant.

Audit Code	What action must be taken	Project phase	To requirements of	Status: October 2008 – October 2009
Subject	How action must be taken and/or objective of action	When action to be	On advice from	
	Objective	taken		
	Evidence that action has been taken	Where it is to be		
		taken		
757:M12.4	Action Prior to commencement of construction of plant, make the Greenhouse Gas Abatement Program	Design	DEC	Completed
Greenhouse Gas	required by condition 12-1 publicly available in a manner approved by the CEO.	Ongoing		
Abatement				This condition was met during the 2008 reporting period and no further action is required.
	<u>How</u> Greenhouse Gas Abatement Program to be made available in the following locations: - the Local			
	Government Authority (2 copies), Battye Library (2 copies); Karratha Public Library (2 copies); and DEC			
	Library Perth (2 copies - 1 hard copy, 1 cd copy) - Copies also to be freely available for download from the			
	Woodside internet site, (availability and locations of Greenhouse Gas Abatement Program are to be			
	advertised in the Local newspaper Public Notices).			
	Objective To keep public informed.			
	Edition Constitution (Constitution Constitution Constitut			
	Evidence Copy of advertisement of Greenhouse Gas Abatement Program.			

Audit Code Subject	What action must be taken How action must be taken and/or objective of action Objective Evidence that action has been taken	Project phaseWhen action to be takenWhere it is to be taken	To requirements of On advice from	Status: October 2008 – October 2009
757:M13.1 Offsets	Action Implement the offset package set out in Schedule 6 (Ministerial Statement 757) to the requirements of the Minister for the Environment on advice of the Department of Environment and Conservation. Objective To minimise environmental impacts associated with greenhouse gas emissions. Evidence Pluto LNG Project Ministerial Statement 757 Compliance Report 2009.	taken Overall Ongoing	Minister for Environment DEC	In Progress The Environmental Offsets Governance Committee (EOGC) was established during last reporting period. It is represented by the Deputy Director General of the DEC (Robert Alkins) and the Pluto LNG Project Corporate Affairs and Sustainability Manager (Soolim Carney) who met: 14" January 2009 21st April 2009 21st April 2009 32nd November 2009 Schedule 6 has 7 offset components. Status of each component is as follows: Offset A: Site A Conservation Zone Comments and concurrence for the WBPL drafted "Site A Conservation Zone Monitoring & Management Plan" was being fed back to WEL by DEC and EOGC at the end of reporting period. Final workscope is still to be finalised. Offset B: Rehabilitation/ restoration outside lease Discussions have been initiated between the DEC and WEL to identify potential locations and potential work scopes for the implementation of this offset. WBPL requested the DEC and the EOGC that this Offset be temporarily put on hold until land access issues can be resolved. Offset C: Taxonomic studies of 37 Flora spp A project scoping document was available in December 2008. Implementation was subsequently contracted to the DEC via a Purchase Order raised by WBPL in April 2009. The WA Herbarium have been sub-contracted to undertake the taxonomy utilising specimens collected by M.E Trudgen and Associates. A progress report was received in August 2009. This project will recommence once the WA Herbarium refurbishment is completed. The study is expected to finish in late 2010. Offset D: Research and Monitoring Dampier Archipelago Marine Park A discussion document entitled "Implementation of Marine Environmental Offsets" that outlines proposed arrangements for scoping and implementing marine research and monitoring was prepared and issued to the DEC in August 2009. Awaiting formal comment by DEC. Offset E: Managing Dredging Impacts A proposal for genetic work to resolve taxonomic uncertainties in relation to Rhagada sp. 12, was received from UWA's School of Animal Biology dur
				 Three ethno botanical surveys, (led by ASTRON, represented by 5 local Aboriginal groups) were conducted in February, June and August 2009 on the Burrup Peninsula. Specimens collected are being lodged with the WA Herbarium and a draft report had been prepared in November 2009.
757:M14.1 Decommissioning	Action Prepare a Preliminary Decommissioning Plan for approval by the CEO, which describes the framework and strategies to ensure that the site is suitable for future land uses, and provides: 1. the rationale for the siting and design of plant and infrastructure as relevant to environmental protection; 2. a conceptual description of the final landform at closure; 3. a plan for a care and maintenance phase; and 4. initial plans for the management of noxious materials. Objective To outline a plan for decommissioning.	Design Prior to submitting a Works Approval application for the plant.	DEC	In Progress The Preliminary Decommissioning Plan was submitted to DEC on 30 April 2008 prior to submission of a Works Approval Application for the plant. Negotiations to finalise the plan continue. The latest response from DEC was received on 2 October 2009. Woodside is in the process of responding to the DEC.
	Evidence Preliminary Decommissioning Plan.			

Audit Code Subject	What action must be taken How action must be taken and/or objective of action Objective Evidence that action has been taken	Project phaseWhen action to be takenWhere it is to be taken	To requirements of On advice from	Status: October 2008 – October 2009
757:M14.2 Decommissioning	Action Submit a Final Decommissioning Plan, for approval of the CEO. How The Final Decommissioning Plan shall set out procedures and measures for: 1. removal or, if appropriate, retention of plant and infrastructure agreed in consultation with relevant stakeholders; 2. rehabilitation of all disturbed areas to a standard suitable for the agreed new land use(s); and 3. identification of contaminated areas, including provision of evidence of notification and proposed management measures to relevant statutory authorities. Objective To ensure that the site is suitable for future land uses. Evidence Final Decommissioning Plan.	Operation At least 6 months before the date of closure or at a time approved by the CEO	DEC	Not applicable for 2008-2009 reporting period Final Decommissioning Plan shall be developed closer to decommissioning date.
757:M14.3 Decommissioning	Action Implement the Final Decommissioning Plan required by condition 14-2 until such time as the Minister for the Environment determines, on advice of the CEO, that the proponent's decommissioning responsibilities have been fulfilled. Objective To fulfil decommissioning responsibilities Evidence CR	Closure Until such time as the Minister for Environment determines on advice of the CEO that the proponent's decommissioning responsibilities have been fulfilled.		Not applicable for 2008-2009 reporting period Final Decommissioning Plan shall be developed closer to decommissioning date.
757:M14.4 Decommissioning	Action Make the Final Decommissioning Plan required by condition 14-2 publicly available in a manner approved by the CEO. How Final Decommissioning Plan to be made available in the following locations: - the Local Government Authority (2 copies), Battye Library (2 copies); Karratha Public Library (2 copies); and DEC Library Perth (2 copies - 1 hard copy, 1 cd copy) - Copies also to be freely available for download from the Woodside internet site, (availability and locations of the Final Decommissioning Plan are to be advertised in the Local newspaper Public Notices). Objective To ensure the public is kept informed Evidence Copy of advertisement of Final Decommissioning Plan	Closure	DEC	Not applicable for 2008-2009 reporting period Final Decommissioning Plan shall be developed closer to decommissioning date.

3. CONCLUSION

The Pluto LNG Project has complied with those Ministerial Conditions relevant to the 2009 reporting period (October 2008 to October 2009).