



**CERVANTES 1**

**COMPLIANCE**

**ASSESSMENT PLAN**

**MINISTERIAL STATEMENT 1178**



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## Revision Control

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## Distribution

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## Terms & Abbreviations

	Definition
CEO	Chief Executive Officer
EPA	Environmental Protection Authority
RCMA	RCMA Australia Pty Ltd

## Related Documents

Document #	Document Name
RCMA-02-EM-PLN-005	Cervantes 1 Conventional Oil Exploration Well Section 38 Referral Supporting Document
RCMA-02-EM-PLN-003	Cervantes 1 Hygiene Management Plan
RCMA-02-EM-PLN-004	Cervantes 1 Vegetation Management Plan
RCMA-02-EM-PLN-007	Cervantes 1 Fauna Management Plan
RCMA-02-EM-PLN-008	Cervantes 1 Rehabilitation Plan

## **1. Introduction**

RCMA Australia Pty Ltd (RCMA) propose to drill the Cervantes 1 exploration well 11 km south of Dongara/Port Denison within Production Licence L14. The proposed site is located within the vegetated Beekeepers Nature Reserve (BKNR) in the northern Perth Basin.

The proposal was referred by RCMA to the EPA in July 2020. The EPA assessed the project on referral information and have issued Ministerial Statement 1178 on 14th December 2021. Condition 11-0 requires the submission of a Compliance Assessment Plan.

### **1.1 Compliance Assessment Plan Objective**

The objective of this Compliance Assessment Plan (CAP) is to provide a guide for reference when compiling Compliance Assessment Reports (CARs) for the Cervantes 1 Project.

### **1.2 Submission of Compliance Assessment Plan**

This CAP has been developed in accordance with the Post Assessment Guideline for Preparing a Compliance Assessment Plan (EPA 2012). Which outlines the following elements to be addressed in all CAPs:

- approach and timing of compliance assessments;
- retention of compliance assessments;
- the reporting of any non-compliance or potential non-compliance including any corrective actions;
- method of making the approved CAP and any Compliance Assessment Reports (CAR) or Statements of Compliance (SoC) publicly available; and
- an audit table.

## 2. Compliance Assessment Plan

Ministerial Statement 1178 requires the Cervantes 1 CAP to outline the details as per Table 1.

**Table 1: Compliance Assessment Plan**

MS1178 Condition	Detail	Section
11-1 (0)	Frequency of Compliance Reporting	Section 2.1 Below
11-1 (1)	Approach and Timing of Compliance Assessments	Section 2.2 Below
11-1 (2)	Retention of Compliance Assessments	Section 2.3 Below
11-1 (3)	Method of Reporting of Potential Non-Compliances and Corrective Actions Taken	Section 2.4 Below
11-1 (4)	Table of Contents of Compliance Assessment Reports	Section 2.5 Below
11-1 (5)	Public availability of Compliance Assessment Reports	Section 2.6 Below
-	Audit Table	Section 3 Below Appendix A

### 2.1 Frequency of Compliance Reporting

Compliance reporting will be undertaken annually for each calendar year by the 31 March.

### 2.2 Approach and timing of Compliance Assessments

Compliance Assessment will be undertaken in the form of auditing against the Ministerial Statement conditions and Management Plans at the intervals outlined in Table 2. Compliance assessment will be against the Audit Table presented in Appendix A. Column seven of the Audit Table indicates the frequency each condition is to be assessed.

**Table 2: Cervantes 1 Compliance Assessments**

Audit Name	Timing
Site Preparation Audit	Once during or immediately post site preparation
Drilling Environmental Audit	Once during drilling activities
Decommissioning / Remediation / Rehabilitation Environmental Audit	During remediation / rehabilitation activities
Annual Internal Environmental Audit (AIEA)	To continue annually where no activities are being undertaken on site until completion criteria has been achieved

Evidence to be collected will include but not be limited to:

- Official surveys
- Mapping
- Reports
- Records
- Forms
- Audits
- Correspondence
- Photographs
- Non-compliance reports
- Current versions of Management Plans
- RCMA website content

### **2.3 Retention of Compliance Assessments**

Compliance reports will be retained for the life of the project and a minimum of seven years following the end of the life of the project in the RCMA CYBRIX Document System. The project life is the continuous period until the CEO notifies RCMA under condition 1178:M09.1.2. Records that will be retained include:

- All compliance statements
- All records, reports and documents used as evidence of compliance
- All revisions of controlled documents
- All audits
- All records required to be made publicly available through the life of the project
- A register of regulator correspondence

### **2.4 Reporting Non-compliances and Corrective Measures**

The CEO will be notified of all non-compliances where RCMA becomes aware a limit, outcome or threshold criteria contained in the Ministerial Statement conditions, or a management plan required in the conditions, has, or is likely to be exceeded within 7 days to [compliance@dwer.wa.gov.au](mailto:compliance@dwer.wa.gov.au).

The CAP will contain details of all non-compliances reported in the reporting year and identified during compliance assessment against the Audit Table (Appendix A). Appendix B presents how the non-compliances will be reported via the Statement of Compliance in the Compliance Assessment Report.



## **2.5 Table of Contents**

The Table of Contents for the Compliance Assessment Report will contain the following:

### **2.5.1 Introduction**

The Compliance Assessment Report will contain an Introduction.

### **2.5.2 Description of Activities**

The Compliance Assessment Report will contain a description of the activities which have occurred during the reporting year.

### **2.5.3 Details of Biological Monitoring**

The Compliance Assessment Report will contain a summary of any biological monitoring which has been undertaken during the reporting year including attachments of the monitoring reports.

### **2.5.4 Statement of Compliance**

The Compliance Assessment Report will contain a populated Audit Table (Appendix A) and a Statement of Compliance (Appendix B).

This will include details of exceedances reported under condition 1178:M11.6 of the Ministerial Statement during the year.

A summary of non-compliances as per Table 3 will be included.

### **2.5.5 Action Status**

The Compliance Assessment Report will contain a current description of the action status for all actions resulting from a non-compliance in Table 3 as summarised in Table 4. It will also contain updates for actions with an open status in a previous Compliance Assessment Report.

## **2.6 Public Availability**

The Compliance Assessment Reports will be available on the company website at:

[www.rcma.com](http://www.rcma.com)

### **3. Audit Table**

Audit tables break down a statement into audit elements to provide a framework for tracking implementation of the requirements of the statement. Audit tables must be included in all CARs and Statements of Compliance (SoC) to clearly identify the compliance status of implementation conditions and procedures of the relevant Statement. When included in the CAR or SoC, the status column of the audit table must be updated with the compliance status of any implementation conditions and procedures of the Statement for the reporting period.

The Cervantes 1 audit table is presented in Table 6.

Phases that apply in this table include:

- Pre-Construction
- Construction
- Operations
- Decommissioning / Rehabilitation
- Overall (several phases)

#### **4. References**

Office of the Environmental Protection Authority (2012) Post Assessment Guideline for Preparing a Compliance Assessment Plan, August 2012.

Office of the Environmental Protection Authority (2012) Post Assessment Guideline for Preparing an Audit Table, August 2012.

**Table 3: Cervantes 1 Non-compliances**

Non-compliance #	Condition #	Non-compliance	Action #	Corrective Action
Example:				
1.	1178:M12.1	Vegetation Management Plan not publicly available	55.	Make Vegetation Plan publicly available

**Table 4: Cervantes 1 Non-compliance Corrective Action Summary**

Corrective Action #	Corrective Action	Corrective Action
Example:		
55.	Make Vegetation Plan publicly available	Vegetation Management Plan has now been placed on the company website with other Cervantes 1 documents at: <a href="http://www.rcma.com">www.rcma.com</a>

## Appendix A Audit Table

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1178:M01.1	Limitation and Extent of Proposal (Physical element)	When implementing the proposal, the proponent shall ensure the proposal does not exceed the Development envelope (36.5 ha)	Survey will be undertaken prior to ground disturbing activities to ensure the proposal development envelope does not exceed 36.5 ha	Evidence survey has been undertaken utilising Ministerial Statement development envelope .shp file (Access_Track_Drill_Pad_20210315)	Overall	Annual		
1178:M01.2	Limitation and Extent of Proposal (Physical element)	When implementing the proposal, the proponent shall ensure the proposal does not exceed the Disturbance footprint (Up to 7 ha)	Survey will be undertaken prior to ground disturbing activities to ensure the proposal disturbance footprint does not exceed 7 ha	Evidence that disturbance footprint has been marked out with survey pegs	Overall	Annual		
1178:M01.3	Limitation and Extent of Proposal (Physical element)	When implementing the proposal, the proponent shall ensure the proposal does not exceed the following extent of direct disturbance of native vegetation (Up to 5.3 ha)	Survey will be undertaken prior to ground disturbing activities to ensure the proposal direct disturbance of native vegetation does not exceed 5.3 ha	Evidence that disturbance of native vegetation is wholly within survey pegs (GIS plot) and confirming disturbed vegetation ≤5.3 ha	Overall	Annual		
1178:M01.4	Limitation and Extent of Proposal (Physical element)	When implementing the proposal, the proponent shall ensure the proposal does not exceed the following extent of Direct disturbance of priority 1 'Coastal sands dominated by <i>Acacia rostellifera</i> , <i>Eucalyptus oraria</i> and <i>Eucalyptus obtusiflora</i> ' Priority Ecological Community (PEC) (Up to 0.99 ha)	Survey will be undertaken prior to ground disturbing activities to ensure the proposal does not impact more than 0.99 ha PEC	Disturbance of PEC is for track widening to 9 m only (photographs and GIS plot) and confirming disturbed PEC ≤0.99 ha	Overall	Annual		
1178:M01.5	Limitation and Extent of Proposal (Operational elements)	When implementing the proposal, the proponent shall ensure the proposal uses conventional extraction methods	The Cervantes 1 well will be drilled by a conventional drilling rig with conventional drilling methods	Ensign Rig 970 is utilised for the drilling of the Cervantes 1 well	Operation	Annual		
1178:M01.6	Limitation and Extent of Proposal (Operational elements)	When implementing the proposal, the proponent shall ensure the proposal conducts rehabilitation consistent with an approved Rehabilitation Plan	RCMA will undertake rehabilitation in accordance with Cervantes 1 Rehabilitation Plan [RCMA-02-EM-PLN-008]	Audit shows that Cervantes 1 rehabilitation is conducted in accordance with Cervantes 1 Rehabilitation Plan [RCMA-02-EM-PLN-008]	Decommissioning	Annual		
1178:M01.7	Limitation and Extent of Proposal (Operational elements)	When implementing the proposal, the proponent shall ensure the proposal is decommissioned to ensure that the Removal of all drilling and exploration related infrastructure and equipment not required to remain under the Petroleum and Geothermal Energy Resources Act 1967	There should be no infrastructure or permanent markers (other than the well abandonment plaque), steel pegs or litter left on the rehabilitated area at any time following rehabilitation	Monthly workplace inspection record form [RCMA-02-SAF-FM-006] confirms there are no permanent markers or litter left on site	Overall	Annual		
1178:M01.8	Limitation and Extent of Proposal (Timing elements)	When implementing the proposal, the proponent shall ensure the proposal does not exceed the following extents: site preparation and drilling activities up to six (6) months from substantial commencement	RCMA has six months from substantial commencement to undertake site preparation and drilling	DMIRS manhours report shows site preparation and drilling are undertaken within six months of substantial commencement date	Overall	Annual		
1178:M01.9	Limitation and Extent of Proposal (Timing elements)	When implementing the proposal, the proponent shall ensure the proposal does not exceed the following extents: rehabilitation up to three (3) years from plugging of the well	RCMA shall rehabilitate the wellsite within three years from plugging the well	Records show rehabilitation is undertaken within three years of plugging the well	Decommissioning	Annual		

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1178:M02.1	Time Limit Authorisation	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.	RCMA shall not commence the proposal after 14 December 2026	Records show Cervantes 1 civils are commenced before 14 December 2026	Pre-construction	Annual		
1178:M02.2	Time Limit Authorisation	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.	RCMA shall notify the CEO on substantial commencement of the proposal (before 14 December 2026)	Letter to CEO notifying of substantial commencement of Cervantes 1 proposal implementation	Pre-construction	Annual		
1178:M03.1.1	Flora and Vegetation Outcomes	The proponent shall ensure the following outcomes are achieved: no more than 0.99 ha direct disturbance to Coastal sands dominated by <i>Acacia rostellifera</i> , <i>Eucalyptus oraria</i> and <i>Eucalyptus obtusiflora</i> PEC;	Survey will be undertaken prior to ground disturbing activities to ensure the proposal does not impact more than 0.99 ha PEC	Disturbance of PEC is for track widening to 9 m only (photographs and GIS plot) and confirming disturbed PEC ≤0.99 ha	Overall	Annual		
1178:M03.1.2	Flora and Vegetation Outcomes	The proponent shall ensure the following outcomes are achieved: avoid impacts from the implementation of the proposal to flora and vegetation from changes to fire regime, dieback ( <i>Phytophthora</i> spp) and weeds.	RCMA will avoid impacts from the implementation of the proposal to flora and vegetation from changes to fire regime, dieback ( <i>Phytophthora</i> spp) and weeds	Audit of the Vegetation Management Plan confirms measures are implemented and impacts avoided	Overall	Annual		
1178:M04.1.1	Terrestrial Fauna Outcomes	The proponent shall ensure the following outcome is achieved: avoid impacts from the implementation of the proposal to terrestrial fauna from changes to fire regime, introduction of feral animals, spread of dieback and weeds, vehicle strikes, entrapment in excavation and artificial water bodies, light pollution, noise and dust.	RCMA will avoid impacts from the implementation of the proposal to terrestrial fauna from changes to fire regime, introduction of feral animals, spread of dieback and weeds, vehicle strikes, entrapment in excavation and artificial water bodies, light pollution, noise and dust.	Audit of the Fauna Management Plan confirms measures are implemented and impacts avoided	Overall	Annual		
1178:M05.1	Rehabilitation Plan	The proponent shall update and implement the Rehabilitation Management Plan (29 April 2021) for approval by the CEO, on advice from DBCA. The Rehabilitation Management Plan shall contain provisions for update and review.	RCMA will implement the Cervantes 1 Rehabilitation Plan [RCMA-02-EM-PLN-008v3 24/01/2022] under advice from DBCA (21/01/2022) and it will contain provisions for update and review	Audit of the Rehabilitation Plan confirms the current version is being implemented	Pre-construction	Annual		
1178:M05.2	Rehabilitation Plan	The proponent must not commence ground disturbing works until the CEO has endorsed the latest version of the Rehabilitation Management Plan (29 April 2021) in writing.	RCMA must not commence site preparation until the Rehabilitation Plan has been approved	Audit shows that site preparation did not commence until Rehabilitation Plan was approved	Construction	Annual		
1178:M05.3	Rehabilitation Plan	The proponent shall implement the Rehabilitation Management Plan referred to in condition 5-1 until such time as the CEO agrees that the proponent's rehabilitation completion criteria have been fulfilled.	RCMA must not implement the Rehabilitation Plan until DBCA have approved the completion criteria	Audit shows that DBCA have provided their advice to the CEO on the completion criteria in the approved Rehabilitation Plan	Decommissioning	Annual		
1178:M06.1	Rehabilitation Performance Bond	As security for the due and punctual observance and performance by the proponent of the requirements of condition 5 to be observed, conformed and complied with, the proponent shall lodge with the CEO prior to commencement	RCMA must lodge a Rehabilitation Bond of \$324,500 prior to commencing site preparation activities	RCMA letter to CEO notifying them of Rehabilitation Bond	Pre-construction	Q1 2022 (assessed once)		

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		of site preparation activities, an irrevocable Performance Bond as nominated and approved by the CEO in his/her sole unfettered discretion to a cash value and in a form acceptable to the CEO ("the Security") which Security at the date hereof being \$324,500.						
1178:M06.2	Rehabilitation Performance Bond	If the proponent encounters hydrocarbons that have the potential to lead to a commercial field development, as security for the due and punctual observance and performance by the proponent of the requirements of condition 5 to be observed, conformed and complied with, the proponent shall lodge with the CEO on demand within three (3) months of the casing and suspension of the proposal, an irrevocable Performance Bond as nominated and approved by the CEO in his/her sole unfettered discretion to a cash value and in a form acceptable to the CEO ("the Security") which Security at the date hereof being \$275,000.	RCMA must lodge a Decommissioning Bond of \$275,000 within three months following a commercial hydrocarbon discovery	RCMA letter to CEO notifying them of Decommissioning Bond	Operations	Q3 2022 (assessed once)		
1178:M06.3	Rehabilitation Performance Bond	Upon completion of appropriate decommissioning and rehabilitation works at the site as agreed by the CEO, the Performance Bond referred in condition 6-1 can be reduced to \$93,000 as a contingency Performance Bond. Additional works would be required if completion criteria have not been achieved in a period of three (3) years following completion of decommissioning and rehabilitation works as determined by the CEO, on advice of DBCA.	Following rehabilitation activities, on approval of the CEO, the Rehabilitation Bond is reduced to a Contingency Rehabilitation Bond of \$93,000	Letter from CEO notifying permission for bond reduction	Decommissioning	Annual		
				RCMA letter to CEO notifying them of Contingency Rehabilitation Bond				
1178:M06.4	Rehabilitation Performance Bond	Security required by conditions 6-1, 6-2 and 6-3 may be reviewed at any time under Part VA 'Financial assurances' of the <i>Environmental Protection Act 1986</i> .	Rehabilitation Bond, Decommissioning bond and Contingency Rehabilitation Bond may be reviewed at any time.	-	Overall	Annual		
1178:M07.1	Offsets	If completion criteria have not been fulfilled after decommissioning and rehabilitation, and a further three (3) years following additional works, resulting in significant residual impacts on Beekeepers Nature Reserve, then the proponent shall implement offsets to counter-balance any residual impacts on the nature reserve as determined by the CEO, on advice of DBCA.	More works (re rehabilitation) must be undertaken if rehabilitation is unsuccessful after 3 years	Re rehabilitation completion report	Decommissioning	Annual		
			Offsets must be implemented 3 years after re rehabilitation if works are unsuccessful	Rehabilitation Monitoring Report Year 6		Annual		
1178:M08.1	Environmental Management Plan(s): Monitoring and Adaptive Management Program	Prior to ground disturbance and for approval, the proponent must prepare and submit to the CEO Environmental Management Plan(s) to substantiate that the outcomes of conditions M3, M4 and M5 will be met. The Plans must include: (1) threshold criteria that provide a limit beyond which the environmental outcomes are not achieved;	RCMA will prepare and submit and obtain approval from the CEO for Cervantes 1 Vegetation Management Plan [RCMA-02-EM-PLN-004], Cervantes 1 Fauna Management Plan [RCMA-02-EM-PLN-007], Cervantes 1 Weed and Dieback Hygiene Management Plan [RCMA-02-EM-PLN-003] and Cervantes 1	CEO approval letter for Management Plans	Pre-construction	Q1 2022 (assessed once)		



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		(2) trigger criteria that will provide an early warning that the environmental outcomes are not likely to be met; (3) monitoring parameters, sites, control/reference sites, methodology, timing and frequencies which will be used to measure threshold and trigger criteria. Include methodology for determining alternate monitoring sites as a contingency if proposed sites are not suitable in the future; (4) baseline data; (5) data collection and analysis methodologies; (6) adaptive management methodology; and (7) contingency measures which will be implemented if threshold or trigger criteria are met.	Rehabilitation Plan [RCMA-02-EM-PLN-008]					
1178:M08.2	Environmental Management Plan(s): Monitoring and Adaptive Management Program	The exceedance of a threshold criteria (regardless of whether threshold contingency measures have been or are being implemented), and / or failure to comply with the requirements of the Environmental Management Plan represents a non-compliance with these conditions.	The exceedance of a threshold criteria and / or failure to comply with the requirements of the Environmental Management Plans represents a non-compliance with these conditions	Non-compliance report	Overall	Annual		
				Internal audit report				
				Annual compliance assessment report				
1178:M08.3	Environmental Management Plan(s): Monitoring and Adaptive Management Program	The proponent must not commence operations until the CEO, on advice from DBCA, has confirmed in writing that the Environmental Management Plan(s) satisfies the requirements of this condition.	RCMA must have CEO approval for Environmental Management Plans prior to site preparation	Audit confirms site preparation activities commenced after CEO approval letter for Management Plans	Pre-construction	Q1 2022 (assessed once)		
1178:M09.1.1	Environmental Management Plan(s): General Provisions	After receiving notice in writing from the CEO that the management plan(s) for conditions 3, 4 and 5 of this Statement satisfy the requirements of condition 8 respectively, the proponent shall implement the proposal in accordance with the management plans	RCMA must implement the Cervantes 1 proposal in accordance with the Cervantes 1 Vegetation Management Plan [RCMA-02-EM-PLN-004], Cervantes 1 Fauna Management Plan [RCMA-02-EM-PLN-007], Cervantes 1 Weed and Dieback Hygiene Management Plan [RCMA-02-EM-PLN-003] and Cervantes 1 Rehabilitation Plan [RCMA-02-EM-PLN-008]	Audit shows that RCMA has implemented the Cervantes 1 proposal in accordance with the Environmental Management Plans	Overall	Annual		
1178:M09.1.2	Environmental Management Plan(s): General Provisions	After receiving notice in writing from the CEO that the management plan(s) for conditions 3, 4 and 5 of this Statement satisfy the requirements of condition 8 respectively, the proponent shall continue to implement the approved plans and programs until the CEO has confirmed by notice in writing that it has been demonstrated that the condition requirements have been met and	RCMA must continue to implement the Cervantes 1 proposal in accordance with the Cervantes 1 Vegetation Management Plan [RCMA-02-EM-PLN-004], Cervantes 1 Fauna Management Plan [RCMA-02-EM-PLN-007], Cervantes 1 Weed and Dieback Hygiene Management Plan	Letter from the CEO notifying RCMA that the condition requirements have been met and the implementation of the Environmental Management Plans is no longer required	Overall	Annual		

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		therefore the implementation of the actions is no longer required	[RCMA-02-EM-PLN-003] and Cervantes 1 Rehabilitation Plan [RCMA-02-EM-PLN-008] until the CEO notifies RCMA					
1178:M09.2	Environmental Management Plan(s): General Provisions	The proponent may review and revise the management plan(s).	RCMA may review and revise the management plan(s)	Amended version of the management plan submitted to CEO for approval	Overall	Annual		
1178:M09.3	Environmental Management Plan(s): General Provisions	The proponent shall review and revise the management plan(s) as and when directed by the CEO.	RCMA shall review and revise the management plan(s) as and when directed by the CEO	Amended version of the management plan submitted to CEO for approval	Overall	Annual		
1178:M09.4	Environmental Management Plan(s): General Provisions	The proponent shall implement the latest version of the management plan(s), which the CEO has confirmed by notice in writing, satisfies the requirements of conditions M3, M4, M5 and M8 respectively.	RCMA shall implement the CEO approved version of the management plan(s)	Letter from CEO approving management plan(s)	Overall	Annual		
				Audit confirming Cervantes 1 proposal is managed under current version of management plan(s)				
1178:M09.5	Environmental Management Plan(s): General Provisions	Despite condition M9.4, but subject to conditions M9.6 and M9.7, the proponent may implement minor revisions to a management plan(s) if the revisions will not result in any new or increased adverse impacts to the environment or result in a risk to the achievement of the management plan(s) limits, outcomes or objectives.	RCMA may implement minor revisions to a management plan(s) if the revisions will not result in any new or increased adverse impacts to the environment or result in a risk to the achievement of the management plan(s) limits, outcomes or objectives	Amended version of the management plan(s)	Overall	Annual		
1178:M09.6	Environmental Management Plan(s): General Provisions	If the proponent is to implement minor revisions to a management plan(s) under condition 9-5, the proponent must provide the CEO with the following at least twenty (20) business days before it implements the revisions: (1) revised management plan(s) clearly showing the minor revisions; (2) explanation of reasons for the minor revisions; and (3) explanation of why the minor revisions will not result in a new or increased adverse impacts to the environment or result in a risk to the achievement of the management plan limits, outcomes or objectives.	RCMA must provide the CEO with the management plan(s) with minor revisions at least 20 days before implementation including: (1) revised management plan(s) clearly showing the minor revisions; (2) explanation of reasons for the minor revisions; and (3) explanation of why the minor revisions will not result in a new or increased adverse impacts to the environment or result in a risk to the achievement of the management plan limits, outcomes or objectives.	Amended version of the management plan(s)	Overall	Annual		
				Letter from CEO approving management plan(s)				
1178:M09.7	Environmental Management Plan(s): General Provisions	The proponent must cease to implement any revisions which the CEO notifies the proponent in writing may not be implemented.	RCMA must implement the management plan(s) approved by the CEO and management plan(s) with minor changes unless notified by the CEO	Letter from CEO approving management plan(s)	Overall	Annual		

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1178:M09.8	Environmental Management Plan(s): General Provisions	Management Plans must be provided in electronic form suitable for publication on the EPA website within ten (10) business days of endorsement, and also be provided on the proponent's website.	Management Plans must be sent to CEO in electronic format suitable for EPA website within ten (10) business days of endorsement, and also be posted on the RCMA website.	Electronic management plan(s) provided to the CEO Management Plan(s) are posted at: www.rcma.com	Overall	Annual		
1178:M10.1	Contact Details	The proponent shall notify the 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.	RCMA shall notify the CEO of any change of name, physical address or postal address for the serving of notices or other correspondence within twenty-eight (28) days of such change	Audit confirms that details lodged with the CEO are current	Overall	Annual		
1178:M11.1	Compliance and Exceedance Reporting	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 M11.5, or prior to implementation of the proposal, whichever is sooner.	RCMA will submit a Compliance Assessment Plan prior to Site Preparation	Audit confirms that the Compliance Assessment Plan was submitted prior to Site Preparation	Pre-construction	Complete 16/12/2021		
1178:M11.2	Compliance and Exceedance Reporting	The Compliance Assessment Plan shall indicate: (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.	The Compliance Assessment Plan shall indicate: (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.	Audit confirms that the Compliance Assessment Plan contains the required content	Overall	Q1 2022 (assessed once)		
1178:M11.3	Compliance and Exceedance Reporting	After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the requirements of condition M11.2, the proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by condition M11.1.	RCMA shall assess compliance with conditions in accordance with the Compliance Assessment Plan	Audits reports containing Compliance Assessment Plan audit table assessing compliance with conditions Audit reports assessing compliance of proposal with Environmental Management Plans; Vegetation management Plan, Fauna Management Plan, Hygiene Management Plan and Rehabilitation Management Plan	Overall Overall	Annual Annual		

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1178:M11.4	Compliance and Exceedance Reporting	The proponent must provide an annual Compliance Assessment Report to the CEO for the purpose of determining whether the implementation conditions are being complied with.	RCMA must provide an annual Compliance Assessment Report	Annual Compliance Assessment Report	Overall	Annual		
1178:M11.5	Compliance and Exceedance Reporting	The first annual Compliance Assessment Report must be submitted within twelve months of the issuing of this statement commencing on the first 31 March after the date of this Statement, and subsequent Compliance Assessment Reports must be submitted annually from that date, unless a different date is approved by the CEO.	RCMA must provide first annual Compliance Assessment Report by 31 March 2022 and annually thereafter	Annual Compliance Assessment Report	overall	Annual		
1178:M11.6	Compliance and Exceedance Reporting	Each annual Compliance Assessment Report must be endorsed by the proponent's Chief Executive Officer and must: (1) state whether each condition of this Statement has been complied with; (2) provide evidence to substantiate statements of compliance, or details of where there has been a non-compliance and describe corrective and preventative actions taken; and (3) be provided in a form suitable for publication on the EPA website.	RCMA CEO must endorse the annual Compliance Assessment Report which must: (1) state whether each condition of this Statement has been complied with; (2) provide evidence to substantiate statements of compliance, or details of where there has been a non-compliance and describe corrective and preventative actions taken; and (3) be provided in a form suitable for publication on the EPA website.	Annual Compliance Assessment Report is completed in accordance with Compliance Assessment Plan and endorsed by RCMA CEO	Overall	Annual		
1178:M11.7.1	Compliance and Exceedance Reporting	If the proponent becomes aware a limit, outcome or threshold criteria contained in these conditions, or a management plan required in these conditions, has, or is likely to be exceeded, the proponent must report this to the CEO within seven (7) days	RCMA must report within 7 days to the CEO where they become aware of a non-compliance (a limit, outcome or threshold criteria contained in these conditions, or a management plan required in these conditions, has, or is likely to be exceeded)	Non-compliance report	Overall	Annual		
				Notification to DWER: compliance@dwer.wa.go.au				
1178:M11.7.2	Compliance and Exceedance Reporting	If the proponent becomes aware a limit, outcome or threshold criteria contained in these conditions, or a management plan required in these conditions, has, or is likely to be exceeded, the proponent must implement contingency measures	RCMA must implement contingency measures if they become aware of a non-compliance	Non-compliance report	Overall	Annual		
				Notification to DWER: compliance@dwer.wa.go.au				
1178:M11.7.3	Compliance and Exceedance Reporting	If the proponent becomes aware a limit, outcome or threshold criteria contained in these conditions, or a management plan required in these conditions, has, or is likely to be exceeded, the proponent must investigate the cause of the exceedance	RCMA must investigate the cause of the exceedance if they become aware of a non-compliance	Non-compliance report	Overall	Annual		
				CEO Report (21 day): compliance@dwer.wa.go.au				

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
1178:M11.7.4	Compliance and Exceedance Reporting	If the proponent becomes aware a limit, outcome or threshold criteria contained in these conditions, or a management plan required in these conditions, has, or is likely to be exceeded, the proponent must investigate environmental impacts of the exceedance	RCMA must investigate the environmental impacts of the exceedance if they become aware of a non-compliance	Non-compliance report	Overall	Annual		
				CEO Report (21 day): compliance@dwer.wa.go.au				
1178:M11.7.5	Compliance and Exceedance Reporting	If the proponent becomes aware a limit, outcome or threshold criteria contained in these conditions, or a management plan required in these conditions, has, or is likely to be exceeded, the proponent must propose rectification measures	RCMA must propose rectification measures if they become aware of a non-compliance	Non-compliance report	Overall	Annual		
				CEO Report (21 day): compliance@dwer.wa.go.au				
1178:M11.7.6	Compliance and Exceedance Reporting	If the proponent becomes aware a limit, outcome or threshold criteria contained in these conditions, or a management plan required in these conditions, has, or is likely to be exceeded, the proponent must propose measures to ensure no further impact as a result of the exceedance	RCMA must propose measures to ensure no further impact as a result of the exceedance if they become aware of a non-compliance	Non-compliance report	Overall	Annual		
				CEO Report (21 day): compliance@dwer.wa.go.au				
1178:M11.7.7	Compliance and Exceedance Reporting	If the proponent becomes aware a limit, outcome or threshold criteria contained in these conditions, or a management plan required in these conditions, has, or is likely to be exceeded, the proponent must provide a further report to the CEO within twenty-one (21) days of the original report, detailing the measures required under this condition	RCMA must provide a further report on the incident to the CEO within 21 days of the original report	CEO Report (21 day): compliance@dwer.wa.go.au	Overall	Annual		
1178:M12.1	Public Availability of Data	Subject to condition M12.2, 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.	RCMA must upload the following to (www.rcma.com): 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	Audit confirms all required information is available at www.rcma.com	Overall	Annual		
1178:M12.2	Public Availability of Data	If any data referred to in condition 12-1 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 publicly available. In making such a request the proponent shall provide the CEO with an explanation and reasons why the data should not be made publicly available.	RCMA may submit a request to the CEO not to make data publicly available with justification	Letter to the CEO requesting data remain confidential	Overall	Annual		

Compliance Status: C = Compliant, CLD = Completed, NC = Non – compliant, NR = Not Required at this stage. Please note the terms NA = Not Audited and VR = Verification Required are only for OEPA use. IP = In Process may only be used by the proponent in circumstances outlined in Section 2.8 of the Post Assessment Guideline for Preparing an Audit Table.



## Appendix B Statement of Compliance

### 1. Proposal and Proponent Details

Proposal Title	<i>CERVANTES-01 CONVENTIONAL WELL DRILLING PROPOSAL</i>
Statement Number	<i>1178</i>
Proponent Name	<i>RCMA Australia Pty Ltd</i>
Proponent's Australian Company Number	612 244 827

### 2. Statement of Compliance Details

Reporting Period	<i>Click to enter start date to Click to enter end date</i>
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Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction	<input type="checkbox"/>	Construction	<input type="checkbox"/>	Operation	<input type="checkbox"/>	Decommissioning	<input type="checkbox"/>

Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:	2
<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 B1.</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)	<input type="checkbox"/>	Yes (please proceed to Section 4)	<input type="checkbox"/>

### 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 Chief Executive Officer, DWER?	
<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:

- in the reporting period addressed in this Statement of Compliance; and
- as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance.  
(the above information may be provided as an attachment to this Statement of Compliance)

For additional non-compliance or potential non-compliance, please duplicate pages of Section 3 as required.

#### 4. Proponent Declaration

I, Chris Newport (Director), declare that I am authorised on behalf of RCMA Australia Pty Ltd (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:.....

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.

#### 5. 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.

#### 6. 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, Joondalup DC, WA 6919

Phone: (08) 6364 7000

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

## 7. Post Assessment Guidelines and Forms

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

Table B1: Compliance Status Terms

Compliance Status Terms	Abbrev	Definition	Notes
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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