

# AGP SAFETY CASE SUMMARY



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# ATHENA GAS PLANT

## DESCRIPTION OF OPERATIONS

Cooper Energy (on behalf of joint venture partners Cooper Energy Pty Ltd, Peedamullah Petroleum Pty Ltd and Mitsui E&P Australia Pty Ltd) operates the Athena Gas Plant at 192 Brumby's Road, approximately 5.5km northwest of Port Campbell in Victoria (see Figure 1). The plant processes natural gas extracted from the offshore Casino Henry Netherby field in the Otway Basin.

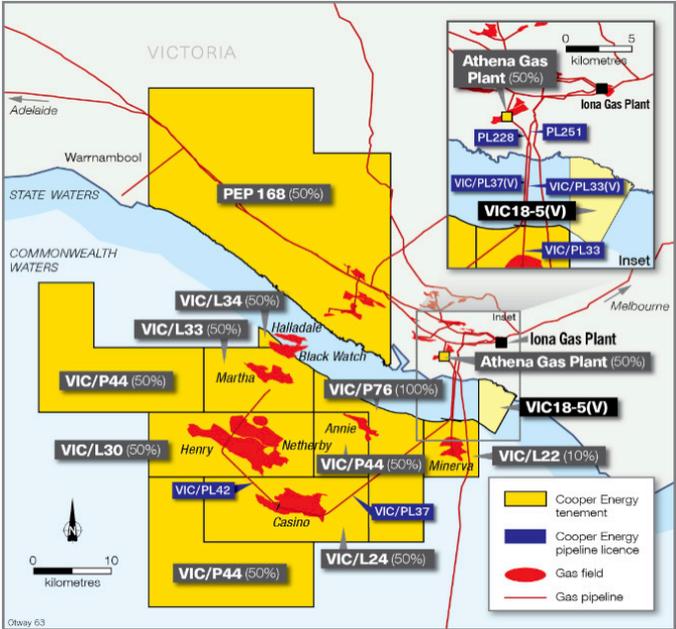
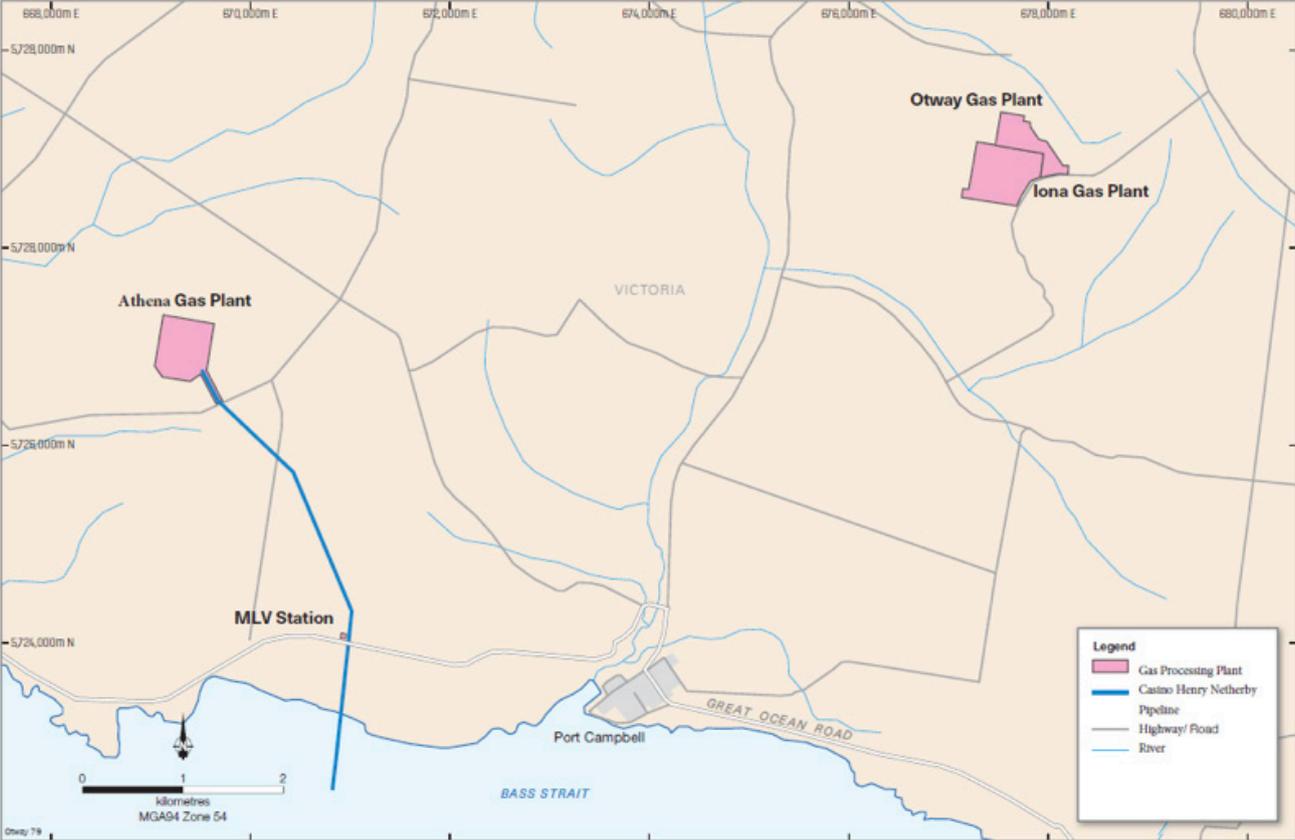


Figure 1: AGP and MLV locations





The Plant removes liquids (water and condensate), and the gas is then compressed, and an odourant is added before it leaves the plant as processed sales gas.

The sales gas is exported off-site to supply Victoria and South Australia. The Victorian market is supplied via the South West (SW) Pipeline operated by Australian Energy Market Operator Ltd (AEMO) to the Victorian Gas Transmission System. The South Australian market is supplied via the South East Australian Gas (SEAGas) Pipeline operated by SEAGas. Condensate recovered from the gas is stabilised, stored on-site and batch exported via road tankers. Wastes are also stored on-site and removed via road transport. The Athena Gas Plant has storage and truck loading facilities for all wastes and products.

The AGP is designed to be operated with a high level of automation to allow safe and effective operation over the facility's entire life with minimum manning. The site will be staffed on a 24/7 basis by a multi-skilled team of Production Technicians working a cyclic rotating 12-hour shift.

## OPERATOR OF THE AGP

### CORPORATE NAME

Cooper Energy (CH) Pty Ltd

### TRADING NAME

Cooper Energy

### ACN

615 355 023

### REGISTERED OFFICE

Level 8, 70 Franklin Street,  
Adelaide SA 5000

### REGISTERED ADDRESS

Level 8, 70 Franklin Street,  
Adelaide SA 5000

### FACILITY ADDRESS

Athena Gas Plant, 192 Brumby's Road,  
Port Campbell, Victoria 3268



## MAJOR HAZARD FACILITY

Athena Gas Plant is classified as a 'Major Hazard Facility' by WorkSafe Victoria as defined by the Occupational Health and Safety Regulations (Part 5.2 – Major hazard facilities).

A Major Hazard Facility is an industrial site where the quantity of hazardous materials listed in the Regulations is present or likely to be present in a quantity exceeding the designated threshold quantities outlined in the Regulations.

Athena Gas Plant's hazardous material quantities are below the threshold except for 'Unstabilised Condensate'.

As one of around 40 such facilities in Victoria, the Athena Gas Plant is considered an essential part of the state's infrastructure, providing critical products and services. Cooper Energy has registered the site as a Major Hazard Facility with WorkSafe Victoria and has undertaken the associated process of applying for a Major Hazard Facility licence.

A Major Hazard Facility is also required to hold a WorkSafe approved Safety Case.

For more information about Major Hazard Facilities, visit <https://www.worksafe.vic.gov.au/what-major-hazard-facility>

THE ATHENA GAS PLANT IS CONSIDERED AN ESSENTIAL PART OF THE STATE'S INFRASTRUCTURE, PROVIDING CRITICAL PRODUCTS AND SERVICES

# HAZARDOUS MATERIALS AT THE ATHENA GAS PLANT

The hazardous materials that will be held at the Athena Gas Plant are listed in Table 1 below. The Regulations describe these materials as Schedule 14 Materials as they appear in Schedule 14 of the Regulations. A minor amount of Liquid Petroleum Gas is kept on-site in cylinders, hence the inclusion in Table 1.

However, due to the minor quantities, further details of its properties have not been provided in the following section. The Athena Gas Plant also stores minor quantities of Class 2.1 and 2.2 gases in cylinders (for example, acetylene and oxygen) and minor quantities of flammable liquids (for example, paints and thinners) for maintenance purposes which have not been detailed in this section.

Table 1 Schedule 14 hazardous materials

Material	Schedule 14 table and item number, CAS or UN Number.	Threshold Quantity (tonnes)	Estimated quantity (tonnes)
<b>Natural Gas</b>	Schedule 14, Table 1, item 35 (not compressed); or Schedule 14, Table 2, item 7 (compressed). CAS No. 74-82-8 UN No. 1971	200	11.77
<b>LPG cylinders</b>	Schedule 14, Table 1, item 33. UN No. 1075	200	1.3
<b>Stabilised condensate</b>	Schedule 14, Table 1, item 40. UN No. 1268	25,000	1,274
<b>Unstabilised condensate</b>	Schedule 14, Table 2, item 11. UN No. 1268	200	220
<b>Methanol</b>	Schedule 14, Table 1, item 36. UN No. 1230	5,000	84 (Note – tank capacity quoted. Normal site storage level = 0 tonnes)
<b>Propane (Hychill)</b>	Schedule 14, Table 2, item 7. UN No. 1075	200	6
<b>Odourant</b>	Schedule 14 Table 2, item 11. UN No. 3336	200	3

# PROPERTIES OF HAZARDOUS MATERIALS AT THE ATHENA GAS PLANT

## Methane or natural gas

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Natural gas is mainly composed of methane. It is a colourless, odourless, extremely flammable gas that may form explosive mixtures with air and will readily ignite at normal temperatures. A sudden release of pressurised natural gas or a leak may generate a large volume of flammable/ explosive gas, which would rise as natural gas is lighter than air. Natural gas may spread a long distance before natural or turbulent dilution of vapour occurs; distant ignition and flashback are therefore possible. Immediate ignition of natural gas may produce jet fires; delayed ignition is likely to cause flash fires.

Methane is non-toxic but presents a significant health hazard because it is an asphyxiant, displacing oxygen in the breathable atmosphere. Inhalation of vapours can cause dizziness and drowsiness, reduced alertness and loss of reflexes and coordination. Inhalation of high concentrations may result in asphyxiation. Before asphyxiation can occur, the lower flammability limit (LFL) of methane in the air would be exceeded, possibly resulting in an oxygen-deficient and explosive atmosphere.

Before being exported, the sales gas has mercaptan added to it, adding a distinctive odour to detect any leaks downstream of the plant.

## Condensate (natural gas condensate)

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Condensate is a mixture of hydrocarbon liquids separated from the raw gas received from offshore and stored on-site until removed by truck. It is a clear to brown liquid and is highly flammable and easily ignited by heat, sparks or flames, or other ignition sources. Flowing condensates can be ignited by self-generated static electricity. Gases may form explosive mixtures with air.

Unstabilised condensate is processed or 'stabilised' to remove the volatile components from the liquid as per established standards.

The potential toxicological and physiological effects of exposure to condensate include:

- Eye contact may cause moderate irritation
- Skin contact may cause skin irritation with prolonged or repeated contact. The liquid may be absorbed through the skin in toxic amounts if large areas of skin are exposed repeatedly.
- Inhalation of vapours may result in chemical pneumonia (fluid in the lungs), severe lung damage, respiratory failure and even death.
- Ingestion may cause gastrointestinal irritation, nausea, vomiting and diarrhoea.

## Methanol

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Methanol can be injected into the gas stream to deal with hydrate formation. It is a flammable, clear, colourless liquid with a characteristic alcohol odour. Methanol vapours form an explosive mixture with air and burn with a clear flame. They are heavier than air and may pool in low lying areas. Ignition of methanol may result in a pool fire, flash fire or jet fire, depending on the nature of the release.

The potential toxicological and physiological effects of methanol exposure include:

- Eye contact may cause irritation and damage.
- Skin contact may cause moderate inflammation and irritation of the skin. Entry into the bloodstream may produce systemic injuries and harmful effects.
- Inhalation of vapours and aerosols may produce toxic effects. Prolonged inhalation may produce respiratory discomfort and distress and possibly irreversible damage to organs.
- Ingestion may result in nausea, vomiting, abdominal pain, diarrhoea, dizziness, and irreversible damage of organs.
- Chronic exposure to methanol vapours may produce cumulative effects such as nausea, vomiting, headache, insomnia, vertigo, conjunctivitis, liver and kidney damage.

## Propane

Propane is used as a refrigerant in a closed-loop system on site. Propane is a colourless and flammable heavier-than-air gas that is typically stored as a liquid under pressure. Both propane liquid and gas present significant fire hazards when released and will readily ignite at normal temperatures. A sudden release of propane or a leak may result in rapid vaporisation of propane and the generation of a large volume of flammable/explosive gas.

Propane gas is heavier than air and can collect in low lying areas. Releases will travel along the ground and spread a long distance before natural or turbulent dilution of vapour occurs. Distant ignition of the gas and flashback are possible.

Releases of propane can result in jet fire or flash fire events. Additionally, direct flame impingement to a vessel containing propane can result in a Boiling Liquid Expanding Vapour Explosion.

The potential toxicological and physiological effects of propane exposure include:

- Eye contact: liquid propane may cause severe damage; vapour may cause irritation.
- Skin contact: vaporising liquid or contact with liquid may result in cold burns.
- Inhalation: exposure to vapour may cause light-headedness, dizziness, and drowsiness, while excessive exposure may cause unconsciousness or death due to asphyxiation.

## Odourant (Mercaptan)

Mercaptan is a colourless, flammable liquid that has a distinctive offensive penetrating odour. It is used as an additive to odourless, combustible gases, such as sales gas, to warn of leaks.

Releases of mercaptan will form a pool that will readily vaporise. Vapours are heavier than air and may collect in low areas; distant ignition of gas and flashback are possible. Ignition of releases of mercaptan may result in jet fires and flash fires. Toxic gases, such as sulphur oxides and carbon monoxide, are generated as combustion products from ethyl mercaptan fires.

The potential toxicological and physiological effects of mercaptan exposure include:

- Eye contact: may cause irritation and redness
- Skin contact: may cause inflammation and irritation of the skin
- Inhalation: at low concentrations, mercaptan is extremely nauseating and may cause nose and throat irritation. Inhalation of higher concentrations of mercaptan may cause headache, nausea, weakness, shortness of breath, vomiting, diarrhoea, fatigue, incoordination and irritation of the mucous membrane
- Ingestion: considered an unlikely route, may produce severe damage and result in death.

## SUMMARY OF DANGEROUS GOODS AT THE ATHENA GAS PLANT

Dangerous goods, in addition to those listed above, are stored on-site. These are not considered a potential cause or to increase the likelihood or severity of a Major Incident but may be a fuel source for fires resulting from a Major Incident. Table 2 provides further information.

Table 2 Dangerous goods stored at the Athena Gas Plant

Name	Class, Packing Group, UN Number	Quantity
Diesel fuel	C1 (Combustible liquid)	17.1m3
Mono-Ethylene Glycol (MEG)	C2 (Combustible liquid)	343.8m3
Hot Oil	C2 (Combustible liquid)	4.4m3



The Safety Case demonstrates that:

- Major Incidents that may happen and the hazards that may cause them are identified and associated risks are understood,
- Control measures for eliminating, preventing, and mitigating these risks are adequate, and
- The Safety Management System provides an integrated and comprehensive system for managing all aspects of those control measures.

## ATHENA GAS PLANT SAFETY CASE

Athena Gas Plant holds a Worksafe approved Safety Case. The objectives of the Safety Case are to ensure that operations conducted at the Athena Gas Plant are safe and that all relevant legislation and any associated regulations, codes and standards are satisfied.

The Safety Case is a compilation of four primary documents, these are:

- **Part 1:** Overview - Summary and Introduction;
- **Part 2:** Facility Description;
- **Part 3:** Safety Management System; and
- **Part 4:** Formal Safety Assessment.

There are also two primary emergency response documents:

- Athena Gas Plant Emergency Management System Information (EMSI); and
- Athena Gas Plant Emergency Response Plan (ERP).

These documents are supported by site plans and a Dangerous Goods Manifest which outlines the quantities of dangerous goods on-site.

The Safety Case collates the results of studies, plans, procedures, and systems. Key documents that have supported the development of the Safety Case are:

- Athena Gas Plant Safety Case outline and methodology;
- Athena Gas Plant Quantitative Risk Assessment (QRA);
- Athena Gas Plant Major Incident Hazard / Layers of Protection Analysis Register;
- Athena Gas Plant Emergency Response (Mitigating Measures) Assessment;
- Cooper Energy Safety Management System
- Performance Standards for Safety-Critical Controls; and
- Historical and other studies undertaken during the design phase such as HAZID and HAZOP studies and information provided by the previous operator upon facility transfer of ownership.

# MAJOR INCIDENT RISKS

The Regulations require operators of Major Hazard Facilities to identify and prevent or control Major Incidents that could occur at their site. A Major Incident is defined as any uncontrolled incident involving hazardous materials (as specified in Schedule 14 of the Regulations) with the potential (inherent risk) for consequences of a permanent disability injury or fatality occurring and asset/property damage assessed on a financial consequence basis.

Cooper Energy has undertaken a Formal Safety Assessment to identify all reasonably foreseeable Major Incidents that could occur at the facility and all hazards that could cause or contribute to those Major Incidents. A series of workshops were held by Cooper Energy to develop the Formal Safety Assessment by an experienced hazard identification workshop facilitator. A multidisciplinary team participated in the workshops, including workforce members and other key personnel with extensive knowledge and experience of the upgraded Athena Gas Plant operations and systems.

Hazards (defined as any activity, procedure, plant, process, substance, situation, or other circumstance that could cause or contribute to causing an incident) were assessed to determine worst case credible consequences and escalation potential if the hazard caused an incident. If the worst-case credible consequences were permanent disability, injury, or fatality, this incident is designated as a Major Incident. The hazard that caused it is called a Major Incident Hazard.

The Athena Gas Plant Major Incidents Hazards Register records the identified Major Incident hazards, which are:

- Impact and dropped objects scenarios including excavation works and vehicle collisions;
- Corrosion and erosion failures;
- Material defects and fatigue failures, including small bore fitting failures;
- Flange and joint leaks;
- Overpressure/ under-pressure scenarios;
- Excessive temperature excursions/ low temperature embrittlement;
- High level/overflow;
- Human error – incorrect operation of equipment;
- Structural failures; and
- Environmental events such as earthquakes, bushfires, severe weather/lightning, and flooding.

Nineteen (19) credible Major Incident scenarios were identified - all involve loss of containment (LOC) of Schedule 14 materials that could impact the health and safety of personnel on-site and may escalate to fire and explosion if ignited. The likelihood of those scenarios occurring with controls in place was assessed with the potential consequences to determine the risk level associated with each Major Incident. All were assessed as low to moderate risk levels, with none assessed as extreme or high risks.

The knowledge gained from this process has been used by Cooper Energy to assess the adequacy of existing controls and design and implement new control measures if required to reduce the level of risk “So Far As Is Reasonably Practical.”

These hazards, risks and controls are detailed in the Formal Safety Assessment and are implemented through the Safety Management System.

## IMPACT ON THE COMMUNITY

The potential of an incident to impact the local community off-site has also been assessed. Most events are expected to be contained within the Athena Gas Plant boundary and not impact neighbouring locations due to the quantity of material on-site, on-site safety controls and the buffer distance between the plant and adjacent properties. The exception is the scenario of a full-bore rupture in the gas export area of the plant or gas chiller rupture, which modelling suggests has the potential for glass breakage at nearby properties. The likelihood of such an event is extremely low.

## CONTROL MEASURES FOR MAJOR INCIDENT RISKS

A control measure is defined as any system, procedure, process, device, or other means of eliminating, preventing, reducing, or mitigating the risk of Major Incidents. Controls can be in the form of physical equipment, process controls systems, management processes, operating or maintenance procedures, Emergency Response Plans and key personnel and their actions.

Control measures can be used to prevent an incident (for example, built-in process design features and safety devices) or to reduce or mitigate consequences (fire and gas detection and emergency shutdown systems). They are applied in descending order of effectiveness, the most effective method is eliminating the hazard, and the least effective is personnel use of Personal Protective Equipment.

As part of the Formal Safety Assessment, for each Major Incident Hazard and Major Incident scenario, all existing control measures, or 'layers' of controls, were identified and their adequacy, effectiveness and reliability assessed. Any controls requiring improvements or additional controls were also identified.

## POTENTIAL MAJOR INCIDENTS AT THE ATHENA GAS PLANT

- LOC (Loss of Containment) of Hydrocarbon from Inlet Pipeline or Slug Catcher
- LOC of Hydrocarbon from DPCU
- LOC from Raw Gas Compression (RGC)
- LOC of Sales Gas from Sales Gas Compression (SGC)
- LOC of Sales Gas from Metering and Export Line
- LOC of Hydrocarbon from MPS or Condensate Stabiliser
- LOC of Propane from the Refrigeration System
- LOC from Condensate tanks
- LOC from Condensate pumps
- LOC at Condensate Tanker Load-out
- Uncontrolled burning or explosion in the Thermal Oxidisers
- LOC at Fuel Gas Skid
- LOC of Hydrocarbon from Flare system
- LOC of Hydrocarbon Liquid from Closed Drain System
- LOC of Methanol from Methanol tank or unloading facility
- LOC of Fuel gas from Raw Gas Compression
- LOC of Fuel gas from Sales Gas Compression
- Plant-wide LOC and ignition incidents
- LOC from odourant injection



# SAFETY MANAGEMENT SYSTEMS

A copy of the Cooper Energy Health, Safety, Environment Policy is attached as Appendix 1. The policy and its objectives are implemented through the Cooper Energy Management System, which represents the minimum health, safety, and environment requirements for a Cooper Energy facility.

A site-specific Safety Management System (the Athena Operating Management System) has been developed to align with the Cooper Energy Management System. The Operating Management System is the primary means for ensuring the safe operation of the facility. It provides clear guidance on implementing the adopted control measures and any

improvement recommendations from the Safety Case to prevent and mitigate the risk and consequences of a Major Incident. Details of hazards, consequences and controls within the Athena Gas Plant Safety Case are all inputs into components of the Operating Management System, such as operating procedures, plans, training packages and maintenance schedules.

## CRITICAL CONTROLS

Critical control measures are those control measures that provide the most significant reductions in risk with the highest degree of reliability and are most heavily relied upon to ensure safe operation. Specific procedures and requirements are built around designated critical controls to ensure their continued effectiveness.

Critical controls include critical equipment, such as fire protection systems, communications systems, safety shutdown systems and ignition control. They also contain several procedural controls for areas such as contractor management and emergency response.



# MONITORING CONTROL PERFORMANCE

## PERFORMANCE STANDARDS AND INDICATORS

The effectiveness and performance of controls in place is monitored using Performance standards and indicators. The Athena Gas Plant Major Incident Hazard Register documents the items of equipment and other control measures for each of the identified hazards and the performance standards and indicators used to monitor them.

Specific Performance Standards, Critical Operating Parameters and Key Performance Indicators are applied to critical equipment and critical management systems. These have been developed based on recognised national or international codes/standards and sound engineering practice, supplemented by risk assessment. The Performance Standards capture the assurance tasks that ensure the critical controls are appropriately managed and maintained throughout the operation phase to perform their function in a Major Incident scenario effectively. The Cooper Energy Enterprise Asset Management System has been developed to maintain the critical controls according to the performance standards.

The Operating Management System, which forms part of the Safety Case, includes processes for regularly measuring, monitoring, recording, and analysing the controls and reporting the results to stakeholders. It is a live document, and updates are part of an ongoing process to reflect current operating procedures.

A complete revision and resubmission of the Safety Case to WorkSafe Victoria is undertaken in the event of major plant changes resulting in changes to the risk profile and as part of the Major Hazard Licence renewal process every five years.



## EMERGENCIES

In the event of a major incident, the emergency alarm from the facility may be heard by the immediate neighbouring residents in the area. Emergency services (fire, police, SES and, potentially, ambulance) may also be in attendance.

Emergency services will respond to immediate site requirements and undertake action to isolate residents from any dangers. Residents may be contacted by phone, SMS, or a visit to the premises by SES, Police, CFA, Council, or a Cooper Energy representative of the Athena Gas Plant. In the first instance, this will be to advise of the incident and any action taken. Residents and other community members will be requested to follow any directions and any further emergency services instructions.

If a Major Incident occurs at the Athena Gas Plant:

- Smoke may be seen and smelt if a fire has occurred, and there may be a strong smell of gas because of odourant spills. Residents and community members need to move indoors, close windows and doors and switch off air conditioning.
- Fire may spread off-site to surrounding grassed areas – residents and community members need to follow instructions of emergency services as they will manage traffic and likely isolate the area. Avoid driving in the area.

## EMERGENCY MANAGEMENT

Cooper Energy maintains a crisis and emergency management system to support the preparedness, response and management of events that can threaten the safety and health of personnel, contractors, the public, the environment, asset integrity or operations.

An Emergency Response Plan for the Athena Gas Plant has been developed in consultation with WorkSafe Victoria, emergency services and the local council. The plan outlines equipment, systems, and processes to ensure that the facility responds to an emergency response event. Personnel fulfilling emergency response roles

have been identified and trained accordingly and assessed for their competence. The ERP identifies the emergency response scenarios (including Major Incidents) that may occur and the equipment, procedures, and training in preparation for response and recovery.

The ERP and the controls in place to manage Major Incident risks are tested regularly with emergency services, local council and Cooper Energy personnel using emergency exercises based on identified Major Incident scenarios. The findings are used to improve the controls and systems in place continuously.

# STAKEHOLDER INVOLVEMENT

The Athena Gas Plant Safety Case is based on information developed through the active involvement and consultation of employees, the community, government, and external consultants.

Athena Gas Plant employees and other stakeholders have been involved throughout the process in the following ways:

- Hazard identification and safety assessment activities included workshops with extensive involvement of engineers, operations personnel, technical specialists, and management;
- The operations team and other groups (engineering and design leads, specialist contractors, and Health and Safety representatives) were comprehensively involved throughout the Athena Gas Plant Project and plant restart;
- Major Hazard Facility Safety Case documentation, including the safety assessment and Operations Management System description, is circulated for review and comment by the workforce;
- Personnel are involved in preparing, reviewing, and revising the Emergency Response Plan;
- Country Fire Authority, Fire Rescue Victoria, Victoria Police, WorkSafe Victoria and the local municipal council are consulted on the Emergency Response Plan and off-site impacts of Athena Gas Plant operations; and
- All employees are provided with training, information, and instruction about the Safety Case, including the content and operation of the Operations Management System, the Emergency Response Plan, and the safety role developed for employees. The Athena Gas Plant Safety Case, Major Incident Hazard Register and Operations Management System Manual are available to all employees.

Cooper Energy ensures that the ongoing implementation and maintenance of the Safety Case has input from all levels of the organisation, the main aim being to promote and drive safe operation of the facility. This is done through a range of means such as shift start-up meetings, Health and Safety Committee meetings, inductions and training and pre-job and on-job planning and review.

All contractors and visitors are provided with information on hazards, safety requirements and emergency actions through a mandatory site induction.

Cooper Energy is committed to building and maintaining long term relationships with key stakeholders. Since 2019, when the Athena Gas Plant entered a care and maintenance phase, there has been consultation with the community, most taking place with immediate neighbours and pipeline landholders. Safety Case summary information is provided to the community through the local council and libraries. Regular Community Reference Group meetings are held with the Corangamite Shire, residents and local community members in attendance.



## MORE INFORMATION AND CONTACT DETAILS

Further information on the Athena Gas Plant or the AGP Safety Case can be obtained by contacting:

Shad Paterson, Plant Superintendent

**Email:** [shad.paterson@cooperenergy.com.au](mailto:shad.paterson@cooperenergy.com.au)

**Phone:** 08 6556 2178



# APPENDIX 1

## COOPER ENERGY HEALTH, SAFETY & ENVIRONMENT POLICY

# Health, Safety and Environment Policy

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Cooper Energy | HSE | Policy

## Our Commitment

Care is a core value of Cooper Energy.

Cooper Energy is committed to taking all reasonably practicable steps to protect the health and safety of our workers, contractors, partners, and communities in the areas in which we operate. In addition, we will ensure our business is conducted in an environmentally responsible manner.

## Our Actions

Wherever we operate we will develop, implement, and maintain HSE protocols that are consistent with recognised standards and practices, which will enable us to:

- Proactively assess and control our health and safety risks and environmental aspects and impacts
- Provide the HSE systems and resources to adequately support organisation in meeting its objectives
- Continually improve HSE systems through periodic consultation and review with the workforce
- Ensure all employees and contractors are appropriately trained and competent and suitably supervised to ensure works are undertaken in a safe and environmentally responsible manner
- Monitor HSE performance through the identification and communication to the workforce of clear, effective HSE objectives and targets
- Encourage participation in promoting improvements in safety, health and environmental practices and supporting a positive and caring culture in all areas of Cooper Energy's business
- Identify and comply with relevant HSE legislation and regulations and other requirements to which we subscribe and incorporating any changes into our HSE systems.

## Governance

The HSEC Committee has oversight of this policy. The Managing Director is accountable for communicating this Policy and for ensuring compliance with its undertakings. All **Executive Leadership Team** members and Managers shall ensure the effective implementation, management, and monitoring of the HSEC Management System and its subsequent outcomes. All Staff are responsible for compliance with our policy, standards, and procedures. This policy will be reviewed at appropriate intervals and revised, as necessary.

David Maxwell

Managing Director

# Health, Safety and Environment Policy

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Cooper Energy | HSE | Policy

Additional reading:

- Indigenous and Community Engagement Policy
- **Cooper Energy Values (CMS-LG-POL-0001)**
- Hydrocarbon Reporting Policy
- Modern Slavery Statement
- **Climate Action Policy (CMS-EN-POL-0001)**
- Sustainability Report
- **Environmental Protocol (CMS-EN-PRO-0001)**

## Appendices

### Appendix 1 – Revision History

Revision	Date	Revision Summary
5	22-Sep-2021	Issued for use

# APPENDIX 2

## MAJOR HAZARD FACILITY LICENCE

# Licence to operate a Major Hazard Facility

Occupational Health and Safety Act 2004

Occupational Health and Safety Regulations 2017

This Licence is issued to the operator

Cooper Energy (CH) Pty Ltd

Level 8

70 Franklin Street

Adelaide SA 5000

ACN: 615 355 023

and authorises the facility

Athena Gas Plant

192 Brumbys Road

Port Campbell

Victoria 3269

to operate as a Major Hazard Facility.

The Schedule 14 materials present or likely to be present at the facility are specified in Attachment 1.

Licence Number	Date Granted	Effective Date	Expiry Date
MHL 042/06	31 August 2021	7 October 2021	7 October 2026

Simon Farrar



Director Major Hazards & Dangerous Goods

04 October 2021

### Conditions:

1. By no later than 7 April 2022, Cooper Energy (CH) Pty Ltd (Cooper Energy) is to demonstrate to the satisfaction of WorkSafe Victoria (in its discretion), by written report, that the fire protection systems installed at the Athena Gas Plant (the Facility) continue to be appropriate for the types and quantities of Schedule 14 materials present at the Facility. In order to comply with this condition, Cooper Energy must, at a minimum:
  - a. update the fire safety study (or equivalent technical study) for the Facility (Updated Study); and
  - b. in the event the Updated Study identifies additional risk control measures to reduce the magnitude and the severity of consequences from potential incidents, then Cooper must provide to WorkSafe an action plan detailing when and how it will adopt the risk control measures, so far as is reasonably practicable.

## Attachment 1 to MHL 042/06

### List of Schedule 14 materials present or likely to be present at the facility

Extracted from Table 1 of Schedule 14, *Occupation Health and Safety Regulations 2017*

ITEM	MATERIAL	CAS or UN No. Included UNDER NAME
33	LP gases	UN No. 1075, 1078
35	METHANE or NATURAL GAS, including biogas upgraded to the equivalent quality of natural gas	CAS No. 74-82-8
36	Methanol	CAS No. 67-56-1
40	Petroleum and related vapour cloud forming substances – natural gas condensates (that meet the criteria for hazard category 2) maintained at ambient temperature and pressure	-

Extracted from Table 2 of Schedule 14, *Occupation Health and Safety Regulations 2017*

ITEM	MATERIAL DESCRIPTION
11	Flammable liquids, hazard category 1
12	Flammable liquids, hazard categories 2 or 3 that, once ignited, sustain combustion

**Note:** The small quantities of other Schedule 14 materials mentioned in the Safety Case that may be present at the facility are noted.

Simon Farrar 

Director Major Hazards & Dangerous Goods

04 October 2021