GOVERNMENT OF WESTERN AUSTRALIA

Department of **Mines, Petroleum and Exploration**

Response to submissions

Mines and Petroleum Regulations Amendment Regulations 2026

June 2026

Background

The Department of Mines, Petroleum and Exploration (DMPE) released a consultation draft of the Mines and Petroleum Regulations Amendment Regulations 2026 (MPRAR26) for public comment from 4 December 2025 to 30 January 2026.

The MPRAR26 regulations follow the assent of the *Petroleum Legislation Amendment Act 2024* (PLAA24) which, among other things, amended the existing suite of petroleum legislation to:

- provide a legislative framework for pipeline transport and permanent underground storage of greenhouse gas substances;
- enable the exploration and recovery of 'regulated substances' (proposed to be prescribed as hydrogen and helium);
- provide for electronic transactions; and
- provide for additives to be added to petroleum.

While Part 1 of the PLAA24 commenced on 14 May 2024 (sections 1 and 2), a secondary stage of regulation amendments is required to give effect to the Bill and allow for commencement of the remainder of the PLAA24.

The MPRAR26 primarily amends the 12 current petroleum regulations to facilitate and regulate greenhouse gas (GHG) injection and storage operations and the introduction of the regulated substances under the amended petroleum acts and are part of a package.

These regulations follow on from the consultation process recently concluded for the draft Petroleum, Geothermal Energy and Greenhouse Gas Storage (Greenhouse Gas Injection and Storage) Regulations 2026 and the Petroleum and Greenhouse Gas Storage (Submerged Lands) (Greenhouse Gas Injection and Storage) Regulations 2026.

The 12 current regulations amended are:

- Petroleum and Geothermal Energy Resources (Environment) Regulations 2012
- Petroleum and Geothermal Energy Resources (Hydraulic Fracturing) Regulations 2017
- Petroleum and Geothermal Energy Resources (Registration Fees) Regulations 1990
- Petroleum and Geothermal Energy Resources Regulations 1987
- Petroleum and Geothermal Energy Resources (Resource Management and Administration) Regulations 2015
- Petroleum Pipelines (Environment) Regulations 2012
- Petroleum Pipelines Regulations 1970
- Petroleum (Submerged Lands) (Environment) Regulations 2012
- Petroleum (Submerged Lands) (Pipelines) Regulations 2022
- Petroleum (Submerged Lands) Registration Fees Regulations 1990
- Petroleum (Submerged Lands) Regulations 1990
- Petroleum (Submerged Lands) (Resource Management and Administration) Regulations 2015

As part of the consultation, DMPE committed to provide a response to submissions document and all submissions will be collectively published verbatim, with the submitter listed in this document.

Stakeholder comments

There were seven submissions received from the following stakeholders:

- Australian Energy Producers (AEP);
- APA Group;
- The Chamber of Minerals and Energy WA (CME);
- Global Carbon Capture and Storage Institute (GCCSI);
- The Natural Hydrogen Association of Australia (NH2A);
- Resman; and
- Woodside Energy.

DMPE has considered all submissions received and has revised the MPRAR26 where appropriate.

DMPE thanks all stakeholders for their considered input into the process.

Australian Energy Producers		
Ref #	**Comment**	**DMPE response**
1.	Australian Energy Producers (AEP) appreciates the effort of the Department of Mines, Petroleum and Exploration (DPME) to align State and Commonwealth regulatory frameworks as much as possible. Alignment between jurisdictions is particularly important for the smooth regulatory oversight and operation of projects that span both Western Australia and Commonwealth jurisdictions. In general, the approach of these regulations should be flexible and project specific, and AEP appreciates DMPE's effort to develop an effective regulatory framework which promotes workable interaction across multiple jurisdictions. This framework is essential for enabling the safe and efficient deployment of carbon, capture, utilisation, and storage (CCUS) projects which are critical to achieving emissions reduction targets and supporting Western Australia's energy transition.[1] AEP is supportive of the Draft Regulations and highlights the following: [1] Net Zero Australia, Modelling Summary Report, 2023	DMPE thanks AEP for providing a submission.
2.	**Overlapping Petroleum and GHG Titles and Graticular Block Amalgamation** AEP emphasises that a regulatory framework that enables the amalgamation of graticular blocks to accommodate project requirements is needed to enable CCUS hub development. Current limitations in the regulatory framework prevent the consolidation of blocks into larger title areas (e.g., converting a production to injection licence with addition of a nearby graticular block(s) in order to maximise storage capacity of a reservoir). This process remains critical for efficient project planning, and enabling cooperative arrangements between overlapping petroleum and GHG title holders would minimise conflicts and facilitate the seamless movement of CO2 across blocks. DMP has previously advised that amendments to the Act will be required to enable graticular block amalgamation. DMPE has also identified another section requiring legislative amendment – Section 67. Given that legislative changes will be needed to address issues in section 67, AEP strongly urges that block amalgamation be prioritised and included in any forthcoming amendments to WA's petroleum legislation to avoid ongoing restrictions that will hinder the successful rollout of CCUS projects in Western Australia.	Comments noted, and it is acknowledged that future carbon capture and storage (CCS) developments will require amendments to the current legislative framework to enable the seamless transition of petroleum pipelines, wells and infrastructure for GHG transport and storage purposes.
3.	Besides the issue discussed above, AEP is supportive of the proposed amendments to the Draft Regulations as they will enhance the economic viability, environmental sustainability, and regulatory efficiency of CCUS projects in Western Australia. AEP's members eagerly await the completion of the regulatory framework and the subsequent GHG Injection and Storage acreage release. The completion of the regulatory framework and the commencement of new CCUS projects in Western Australia is a significant milestone in the decarbonisation journey of the State.	DMPE notes AEP's support for the need for amendments to the existing petroleum and geothermal regulations.

APA Group		
Ref #	**Comment**	**DMPE response**
4.	Thank you for the opportunity to comment on the Draft Annual Pipeline Performance Report for pipeline licensees. Our 15,000 kilometres of natural gas pipelines connect sources of supply and markets across mainland Australia. We operate and maintain networks connecting 1.5 million Australian homes and businesses to the benefits of natural gas. We also own or have interests in gas storage facilities and gas-powered generation (GPG). We operate and have interests in 692 MW of renewable generation and battery storage infrastructure, while our high voltage electricity transmission assets connect Victoria with South Australia, New South Wales with Queensland and Tasmania with Victoria. APA actively supports the transition to a lower carbon future. In August 2025, we published our 2025 Climate Transition Plan. This plan outlines our commitments to support Australia's energy transition and pathway to net zero operations emissions by 2050. With our extensive portfolio of assets and expertise across gas, electricity and renewables, APA is well-placed to support the energy transition towards net zero. We appreciate the opportunity to comment on the Mines and Petroleum Regulation Amendment Regulations 2025. We support the integration of greenhouse gas storage and regulated substances across all major petroleum, geothermal and pipeline regulations. This provides greater certainty for emerging technologies and aligns WA's framework with Commonwealth arrangements.	DMPE thanks APA Group for providing a submission.
5.	We are supportive of reform that aims to streamline and modernise regulatory and reporting processes. We seek clarity on how the updated reporting obligations in the Amendment interacts with existing safety and assurance processes to minimise unnecessary duplication and administrative burden. Given the volume and sensitivity of the new reporting requirements, we seek transparency on how DMPE will assess and store submitted data, how it will be used in regulatory decision making, and how long it will be retained and under what conditions it may be disclosed.	The annual pipeline performance reporting requirements are for the purpose of ensuring compliance with the State's petroleum legislative framework and not the regulation of health and safety which is the remit of the Department of Local Government, Industry Regulation and Safety under different Acts. Periodic reporting is one mechanism that supports the Department in undertaking its annual compliance activities in accordance with our approach to risk-based environmental compliance (policy link). DMPE receives wide range of petroleum-related information and data from industry to assist its regulatory regime. Not all information and data are publicly available due to confidentiality restrictions.
6.	Whilst we are supportive of the efficiency provided by the introduction of electronic lodgement, we recommend transitional arrangements to allow operators to update systems, processes and internal controls without compromising compliance. The shift to mandatory digital reporting templates creates significant workload for operators with extensive licence holdings. We support digital modernisation but seek flexibility to group licenses for reporting and to stagger reporting deadlines to ensure efficient compliance.	The PLAA24 introduces provisions to allow for the electronic lodgement and service of documents, where previously hard copy documents (sometimes in multiple copies) were required to be lodged or served. DMPE is progressing an information sheet on the electronic lodgement and service of documents, and this will be published on the website for reference.

APA Group		
Ref #	**Comment**	**DMPE response**
7.	We also note that the Amendment introduces reporting requirements that substantially duplicate information already provided to other regulators. Much of the operational, integrity and assurance data requested is already supplied under existing frameworks, but differences in format and structure mean it cannot be transferred easily. We encourage DMPE to consider opportunities for alignment or data-sharing to minimise duplication while maintaining effective regulatory oversight.	PLAA24 introduces legislation for regulated substances (under Petroleum Titles) and GHG transport and storage. In general, the approach taken by MPRAR26 has been to replicate existing petroleum and geothermal title reporting frameworks for these new resource types. The main exception has been the introduction of an annual pipeline performance report in the two sets of pipeline regulations. These reports are assessed for compliance with title conditions and operations being conducted in a proper and workmanlike manner pursuant to the Acts. They have been introduced for the following reasons: 1. **Repurposing of petroleum pipelines for GHG and blended hydrogen introduces new integrity risks.** The transmission of GHG and blended hydrogen through pipelines originally designed for petroleum products presents emerging technical and integrity challenges. The relevant standards and technical frameworks to govern these activities are still under development or in early stages of maturity. In this context, annual reporting on pipeline-integrity matters provides a proactive mechanism for regulatory oversight and supports early identification of issues associated with these new operating environments. 2. **The State's Petroleum Pipelines regulatory framework requires title holders to comply with:** a) **Statutory conditions; for example, the requirement to operate a pipeline in a proper and workmanlike manner;** b) **Title Conditions imposed on instrument by the Minister or his delegate; and** c) **Supporting conditions and approvals outlined in associated regulations.** On that basis the Minister must be satisfied that a titleholder is in compliance with those requirements. Pipelines to date have been an 'outlier' in that they are the only title type for which there is no periodic reporting. It is acknowledged that the annual reporting requirement may overlap or contain similar information to other secondary approvals; however, this is required in order for the Minister to ensure a titleholder is compliant with the framework outlined above.

APA Group		
Ref #	**Comment**	**DMPE response**
7.		3. **The proposed reporting requirement is consistent with environment and well infrastructure reporting and other Australian jurisdictions**. Similar annual reporting obligations already exist in several State and Territory regulatory frameworks governing petroleum pipelines, including: • South Australia – Energy Resources Regulations 2013 • Victoria – Pipeline Regulations 2017 • New South Wales – Pipelines Regulations 2023 • Queensland – *Petroleum and Gas (Production and Safety) Act 2004* • Northern Territory – Energy Pipeline Regulations 2001 Aligning Western Australia's requirements with these jurisdictions supports regulatory consistency and reflects established national practice.

Chamber of Minerals and Energy of WA		
Ref #	**Comment**	**DMPE response**
8.	The Chamber of Minerals and Energy of WA (CME) is the peak representative body for the resources sector in Western Australia. CME is funded by member companies responsible for 90 per cent of the State's mineral workforce employment.[1] In 2023–24, the WA resources sector accounted for 45 per cent of WA's economic activity,[2] 93 per cent of goods exports[3] and 43 per cent of investment.[4] The sector contributed one third (31.5 per cent) of the WA Government's general revenue via royalties, payroll and other taxes and fees,[5] enabling the provision of essential public goods and services such as doctors and nurses, teachers and police. CME's 2023–24 Economic Contribution Survey found that the WA resources sector supported 3 in 10 jobs in the State.[6] CME welcomes the release of the draft Mines and Petroleum Regulations Amendment Regulations 2025 as an important step forward in the expansion of Carbon Capture, Utilisation and Storage (CCUS) projects in Western Australia (WA). We also acknowledge the release of a draft guideline and templates for the Annual Pipeline Performance Report for pipeline licensees. This submission provides feedback to both documents. 1 Government of Western Australia, 2023–24 Economic Indicators Resource Data File, full-time equivalents onsite under State legislation, Department of Energy, Mines, Industry Regulation and Safety, 29 October 2024. 2 As measured by gross value add (GVA). Australian Bureau of Statistics, 5220 Australian National Accounts: State Accounts, Table 6. 3 Department of Energy, Mines, Industry Regulation and Safety (DEMIRS), 2023–24 Economic Indicators Resource Data File, released 29 October 2024. 4 Includes Gross Fixed Capital Formation plus minerals and petroleum exploration. Australian Bureau of Statistics, 5220 Australian National Accounts: State Accounts, Table 25. Australian Bureau of Statistics, 8412 Mineral and Petroleum Exploration, Table 4. 5 Includes royalties, Commonwealth grants from North West Shelf royalties and iron ore lease rentals plus surveyed expenditure on payroll and other taxes and fees. Government of Western Australia, 2023–24 Annual report on State finances, Department of Treasury, 27 September 2024, Table 2.1 Operating Revenue: General Government, pp 164–165; CME 2023–24 Economic Contribution Survey. 6 Direct and indirect jobs. CME, 2023–24 Economic Contribution: Western Australia, March 2025.	DMPE thanks CME for providing a submission.

Chamber of Minerals and Energy of WA		
Ref #	**Comment**	**DMPE response**
9.	**Acreage for Greenhouse Gas Storage must be released as a priority** There is an urgent need to move as quickly as possible to approve CCUS projects if WA is going to compete for investment in project deployment with jurisdictions that are providing support through their industrial strategies. Regulations to the *Petroleum Legislation Amendment Act 2024* is a critical step forward. However, for CCUS projects to proceed, the timely and frequent release of acreage is critical. The most recent release of acreage under the *Petroleum and Geothermal Energy Resources Act 1967 (PGERA)* closed on 9 January 2025. Further acreage release is required for the development of Petroleum, Geothermal and Greenhouse Gas (GHG) Storage projects. To capitalise on WA's significant storage opportunity, it is necessary to swiftly progress the release of acreage for GHG Storage projects. **Recommendation 1: Acreage Release.** *Department of Mines, Petroleum and Exploration (DMPE) engages with industry to identify potential acreage for release and release the acreage as a matter of urgency.*	**Recommendation 1: Acreage Release** In parallel to preparing for the commencement of the PLAA24, DMPE has been preparing for priority Acreage Releases of prospective areas for GHG and petroleum (including regulated substances) exploration. A release cannot be opened ahead of the commencement of the amendments; however, DMPE intends to first invite nominations for both GHG and petroleum prior to a release. Nominations can be made at any time but are only assessed after a formal nominations period. Further information on nominating areas for a release is available here: www.wa.gov.au/service/natural-resources/energy-resources/nominating-blocks-acreage-release A geothermal energy release is also intended in 2027, with a staggered annual release of each title type in future years.
10.	**Permits on existing titles should acknowledge current compliance** It is anticipated that applications for permits to carry out CCUS activities may be made where there is already an existing title for Petroleum and Geothermal activity. Proponents with existing titles will have already demonstrated capability and compliance with the PGERA, and this should be acknowledged when approving permits to carry out CCUS activities. **Recommendation 2: Avoiding duplication and streamlining process.** *DMPE should ensure permitting processes for CCUS activities that interact with existing titles, leverage existing processes and use any information held under an existing title to streamline the process for regulator and proponent.*	**Recommendation 2: Avoiding duplication and streamlining process.** The PLAA24 introduces a pathway for the holders of a petroleum or geothermal lease or licence to be able to apply for the declaration of a GHG storage formation leading to the grant of a new title. Prior compliance is one consideration in the award of a new title.

Chamber of Minerals and Energy of WA		
Ref #	**Comment**	**DMPE response**
11.	**Annual Pipeline Performance Reports (APPR) should not duplicate existing regulatory processes or establish an unnecessary administrative burden** The proposed requirement for all *Petroleum Pipelines Act 1969 (WA)* and *Petroleum (Submerged Lands) Act 1982 (WA)* pipeline licence holders to submit APPRs introduces a new regulatory reporting requirement which would substantially increase administrative burden for proponents, particularly those with multiple pipeline licences. Operators are currently required to comply with relevant pipeline industry codes and standards. These include safety reporting relating to pipeline operations, environment plans and associated reporting requirements. Rather than being restricted to annual reporting cycles, operators use a risk-based framework to update assurance processes continuously. At this point we are unclear what additional benefits are derived from this additional annual reporting requirement. The default 30-day submission window for an APPR is likely to be challenging, especially if inspection frequencies, inspection reports, and existing operator assurance processes do not align with pipeline licence anniversaries. The requirement for written approval from the Minister to combine titles is likely to add unnecessary administrative overheads for both operators and DMPE. Further, this new requirement should align with the Commonwealth regulations applicable to offshore pipelines in the same jurisdiction. In the absence of a clear case for requiring APPRs we suggest this needs to be clarified prior to proceeding. **Recommendation 3: Cost/benefit assessment of the proposed new APPR requirement.** *Given the additional resourcing requirements for both proponents and DMPE, DMPE should conduct a cost-benefit assessment justifying the new requirements and administrative burdens.* **Recommendation 4: Alignment on reporting timeframes** *DMPE should align submission timeframes with existing reporting. To facilitate this, we recommend the adoption of at least a 90-day default window, alignment of the APPR submission timeframe with the standard calendar year reporting period, and where these options do not result in reporting alignment, the ability to agree a date with the appropriate decision-maker.*	The amended legislation introduces new risks associated with repurposing existing petroleum pipelines for the transmission of GHG streams and blended hydrogen. These changes highlight several important considerations: 1. **Repurposing petroleum pipelines for GHG and blended hydrogen introduces new integrity risks**. The transmission of GHG and blended hydrogen through pipelines originally designed for petroleum products presents emerging technical and integrity challenges. The relevant standards and technical frameworks to govern these activities are still under development or in early stages of maturity. In this context, annual reporting on pipeline-integrity matters provides a proactive mechanism for regulatory oversight and supports early identification of issues associated with these new operating environments. 2. **The State's Petroleum Pipelines regulatory framework requires title holders to comply with**: (a) **Statutory conditions; for example, the requirement to operate a pipeline in a proper and workmanlike manner;** (b) **Title Conditions imposed on instrument by the Minister or his delegate; and** (c) **Supporting conditions and approvals outlined in associated regulations.** On that basis the Minister must be satisfied that a titleholder is compliant with those requirements. Pipelines to date have been an 'outlier' in that they are the only title type for which there is no periodic reporting. It is acknowledged that the annual reporting requirement may overlap or contain similar information to other secondary approvals; however, this is required in order for the Minister to ensure a titleholder is in compliance with the framework outlined above. 3. **The proposed reporting requirement is consistent with other Australian jurisdictions.** Similar annual reporting obligations already exist in several State and Territory regulatory frameworks governing petroleum pipelines, including: • South Australia – Energy Resources Regulations 2013 • Victoria – Pipeline Regulations 2017 • New South Wales – Pipelines Regulations 2023 • Queensland – *Petroleum and Gas (Production and Safety) Act 2004* • Northern Territory – Energy Pipeline Regulations 2001

Chamber of Minerals and Energy of WA		
Ref #	**Comment**	**DMPE response**
11.	**Recommendation 5: Provide option for combined reporting** *DMPE should implement a combined reporting process for proponents with multiple pipelines.* It is likely that the submission of an APPR will involve the disclosure of sensitive information to DMPE. CME member companies have stressed the importance of information-handling and confidentiality protections to ensure that sensitive information is not inadvertently disclosed. **Recommendation 6: Processes for management of confidential and sensitive information.** *DMPE should ensure that APPRs do not require asset-sensitive detail where summary evidence achieves the regulatory objective.*	Aligning Western Australia's requirements with these jurisdictions supports regulatory consistency and reflects established national practice. Commonwealth legislation for pipelines covers pipelines operating in subsea environments. Pipelines over land are better suited to be aligned with other state and territory jurisdictions due to the risk profile (such as petroleum and GHG pipelines passing through densely populated areas, conveyance of GHG and blended H2, etc.) **Recommendation 3:** The commentary notes that operators are required to comply with relevant pipeline industry codes and standards, including safety reporting, Environment Plan reporting, and other associated obligations. However, current reporting frameworks do not address compliance with pipeline-licence conditions or broader operational-integrity matters. Although operators must adhere to industry codes and practices, there is currently no regulatory oversight of pipeline operational matters. Submission of APPRs allows the regulator to have an overview of pipeline operations over the reporting period. The introduction of APPRs would align Western Australia with comparable requirements already in place across other state and territory jurisdictions in Australia. **Recommendation 4:** Draft regulation 27(1)(b) of the Petroleum Pipelines Regulations 1970 and regulation 10B(1)(b) of the Petroleum (Submerged Lands)(Pipelines) Regulations 2022 allow for the provision of the submission of the annual pipeline performance report within another period (other than the default 30 days) upon the authorisation of the Minister. DMPE agree that specific provisions should be made for licensees to request approval from the Minister for a reporting period other than the anniversary date and have made the appropriate changes to these regulations. **Recommendation 5:** Draft regulation 28 of the Petroleum Pipelines Regulations 1970 and regulation 10C of the Petroleum (Submerged Lands) (Pipelines) Regulations 2022 allow the submission of combined annual pipeline performance reports with the written agreement of the Minister. **Recommendation 6**: Asset-sensitive information will be treated as confidential.
12.	CME looks forward to engaging further with DMPE on these important matters impacting the WA resources sector.	DMPE appreciates the comments received and will continue to engage with CME and other stakeholders on resources sector issues.

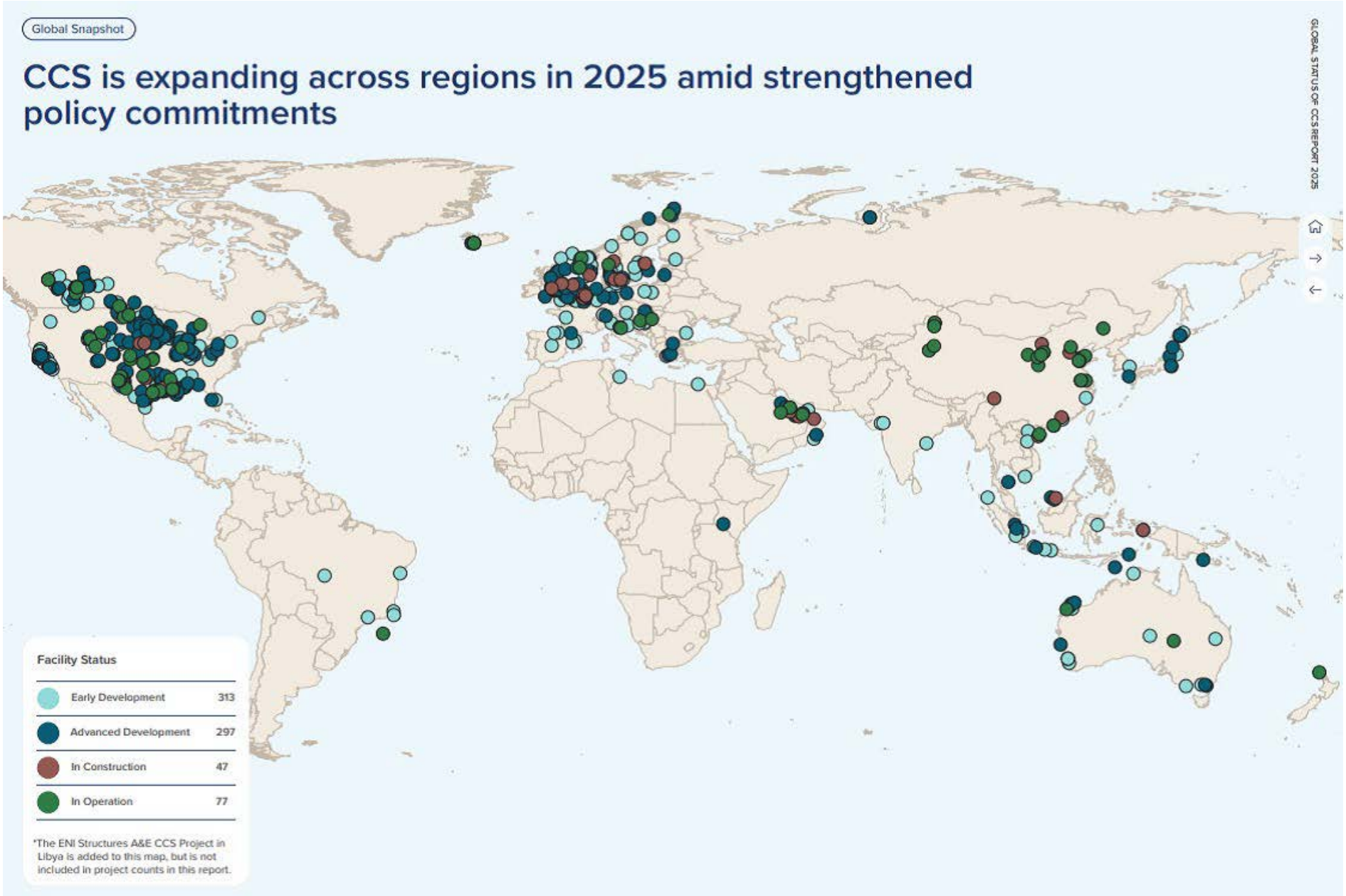
Global Carbon Capture and Storage Institute		
Ref #	**Comment**	**DMPE response**
13.	The Global CCS Institute welcomes the opportunity to provide a submission in response to the Department of Mines, Petroleum and Exploration (DMPE) in Western Australia's (WA) consultation process into the draft Mines and Petroleum Regulations Amendment Regulations 2025. **About the Global CCS Institute** The Global CCS Institute is an international think tank with a mission to accelerate the development and deployment of carbon capture and storage (CCS) worldwide. Headquartered in Melbourne with offices globally, we work with governments, industry, and civil society to scale CCS through insights, advocacy, and collaboration. The Institute is an official UNFCCC observer and secretariat of the Carbon Management Challenge, supporting global decarbonisation. Our government members comprise governments at both national and sub-national levels, including Australia, China, Japan, the Kingdom of Saudi Arabia, the United Kingdom, and the United States of America, and at the sub-national level include Alberta in Canada and the Northern Territory and Victoria in Australia. **CCS and its role in mitigating climate change** Most net zero pathways – including those modelled by the IPCC and the International Energy Agency – highlight an important role for CCS, particularly for scenarios requiring deeper and more rapid decarbonisation. The mitigation potential of CCS technologies is increasingly being recognised around the world with the pipeline of CCS projects steadily growing, underpinned by growing support for the technology in various countries' policy, legal and regulatory frameworks. In 2025, 77 facilities were in operation, up from 50 facilities in 2024, while the total number of facilities in the development pipeline increased from 628 to 734 in the same period. More than 30 countries now recognise CCS within their NDCs under the Paris Agreement, including Australia, with increased promulgation of supportive policy, law and regulation to scale deployment. The increase in projects and policy support reflects how governments and companies are staying the course in progressing this critical technology despite geopolitical headwinds in some regions. (Refer to Figure 1 World map of CCS facilities at various stages of development. at the end of this submission)	DMPE thanks GCCSI for providing a submission.

Global Carbon Capture and Storage Institute		
Ref #	**Comment**	**DMPE response**
13.	**Western Australia's CO2 storage potential** In 2023 the Institute, in partnership with CSIRO, undertook a study into the potential for developing Carbon Capture Utilisation and Storage (CCUS) hubs in Western Australia, in response to a commission request by the WA LNG Jobs Taskforce. The study arrived at several key findings, including: • CCUS is a critical technology for assuring WA's net zero future. • WA has abundant CO2 storage capacity both offshore and onshore, which can store up to 700 years of WA's emissions as well as the CO2 streams of regional neighbouring countries. To realise this potential, the study identified the development of supportive policy and regulatory frameworks as a key driver for accelerating the deployment of projects. With regard to regulatory reform, the study recommends that WA: • Adopt proposed CCS-specific legislation and develop supporting regulations relating to the permitting and approval of titles and activities, • Resolve inconsistencies between Commonwealth and state legislation, • Address provisions within wider legislation that inadvertently obstruct CCS projects, • Streamline approvals pathways through Commonwealth and state legislation for CCS projects.	

Global Carbon Capture and Storage Institute		
Ref #	**Comment**	**DMPE response**
14.	**WA's regulatory reforms to enable CCS** Since the study's findings in 2023, the Institute notes that WA amended its petroleum legislation to incorporate a licensing framework for conducting CCS operations offshore. The new framework, established by the *Petroleum Legislation Amendment Act 2024* (PLAA 2024), effectively amends WA's existing petroleum regime to provide for pipeline transport and permanent underground storage of greenhouse gas substances. The new regime mirrors the framework established by the *Commonwealth Offshore Petroleum and Greenhouse Gas Storage Act of 2006*, which provides the national benchmark for permitting CCS projects in Australia and establishes an integrated approach to CO2 storage operations in Commonwealth waters. The Institute notes that the Commonwealth offshore regime was developed in accordance with the 'Carbon Dioxide Capture and Geological Storage Australian Regulatory Guiding Principles', a set of principles developed by the federal government's Ministerial Council on Mineral and Petroleum Resources (MCMPR) for ensuring a nationally consistent approach to regulating CCS projects across all Australian jurisdictions. Accordingly, Victoria and Queensland have also established legislation and accompanying regulations that are consistent with the Commonwealth offshore regime. The Institute welcomes that the new regime in Western Australia is also consistent with federal legislation for conducting CCS operations as envisaged by the MCMPR principles. WA's Carbon Capture, Utilisation and Storage Action Plan, published in 2024, also highlights the state's ambition to implement a leading legal and regulatory framework for CCUS in the state. The Institute notes that key actions to deliver this ambition include finalising and implementing regulations, procedures and guidance underpinning the new greenhouse gas storage legislation to ensure it is fit-for-purpose. Furthermore, the Action Plan highlights other priority actions, including the development of guidance to support the interaction of state and Commonwealth regimes for CCUS and upholding high standards of operational, maintenance, health, safety and environmental practices to improve competitiveness internationally and prime its position as a destination for attracting international investment and trade in CCUS. The Institute has observed that the WA government has implemented several of its priority actions enumerated within its Action Plan. This includes the development of two sets of new Injection and Storage Regulations which implement the main legislative framework established by the *Petroleum Legislation Amendment Act 2024* (PLAA 2024).	Comments noted.

Global Carbon Capture and Storage Institute		
Ref #	**Comment**	**DMPE response**
15.	**The draft Mines and Petroleum Regulations Amendment Regulations 2025** The Institute recognises that the DMPE's current consultation on the draft Mines and Petroleum Regulations Amendment Regulations 2025 is the next stage in the process of amending WA's petroleum regulations to enable greenhouse gas storage operations in the state and notes that the amendments are intended to complement and build on the two sets of injection and storage regulations previously introduced in 2025. The Institute notes that the amendments introduced to the wider subsidiary regulations applicable to petroleum operations vary in scale and are primarily aimed at extending their scope to include greenhouse gas storage operations. Several of the amendments are definitional and administrative and are not aimed at introducing technical requirements relating to greenhouse gas storage operations of the kind set out under the injection and storage regulations.	Comments noted.
16.	**Basin – and formation-scale pressure considerations** The Institute's submission to this consultation relates primarily to the consideration of basin- and formation-scale pressure behaviour and the interactions that arise where multiple greenhouse-gas storage projects and petroleum operations coexist within pressure-connected systems. The Institute acknowledges that the new amendments are not aimed at the clarification of technical requirements of this nature and that this consultation is not the most appropriate forum for consideration of this issue. However, the purpose of this submission is to formally raise the issue of pressure interactions between projects, and to highlight the limitations of a project-centric, pool-based regulatory mindset when applied to large-scale CO2 storage. While this approach has historically been appropriate for conventional oil and gas developments, it is less suited to CCS systems where pressure effects can propagate over basin scales and extend well beyond individual storage sites. In pressure-connected systems, cumulative and far-field pressure responses may influence injectivity, monitoring footprints, storage performance, containment assurance, and interactions with existing petroleum operations. These effects are not confined to individual projects and cannot be fully evaluated through isolated, site-scale assessments. While the amendments introduce references to "managing formation pressure" and "engineering enhancement," no framework is provided for evaluating inter-project pressure interference, competition for pressure space, or cumulative impacts across multiple operators within a basin.	DMPE acknowledges GCCSI's comments and recommendations regarding basin and formation-scale pressure behaviour where multiple greenhouse-gas storage projects and petroleum operations coexist. DMPE agrees that explanatory guidelines are the best vehicle in which to convey its expectations and requirements to enable them to successfully interact.

Global Carbon Capture and Storage Institute		
Ref #	**Comment**	**DMPE response**
16.	The Institute considers that these issues are best addressed through complementary technical guidance rather than prescriptive regulation. In particular, future guidance could support the development of a "unified pressure-space management framework'', enabling regulators and operators to consistently assess basin-scale pressure behaviour, cumulative impacts, inter-project interactions, and the implications for project sequencing, coexistence with petroleum operations, and acreage release strategies. The Institute's objective in making this submission is therefore not to seek amendments to the current regulations, but to encourage recognition of pressure-space interactions across subsurface projects, including CCS and petroleum operations, as a key emerging issue for CCS deployment, and to support early dialogue with regulators and industry on the development of a unified pressure-space management framework and associated fit-for-purpose technical guidance. The Institute's has a proven track record of supporting governments with CCS legislative development and the Institute remains available to support the WA government if further clarification or assistance is required. The Global CCS Institute convenes Governments and key industry stakeholders in meetings and events on topics that are critical to the design and implementation of legal frameworks on Carbon Capture and Storage. If you would like more information on events, services, or membership please contact: Dr David Kearns at david.kearns@globalccsinstitute.com	


Global Snapshot
CCS is expanding across regions in 2025 amid strengthened policy commitments
GLOBAL STATUS OF CCS REPORT 2025
Facility Status
Early Development 313
Advanced Development 297
In Construction 47
In Operation 77
*The ENI Structures A&E CCS Project in Libya is added to this map, but is not included in project counts in this report.

NH2A		
Ref #	**Comment**	**DMPE response**
17.	The Natural Hydrogen Association of Australia (NH2A) has served as the representative body for the Australian natural hydrogen industry since its establishment in 2021. The Association maintains a broad membership base comprising companies actively engaged in natural hydrogen exploration across Australia. In response to the Department of Mines, Petroleum and Exploration (DMPE) request for comments on the draft *Petroleum Regulations Amendments*, NH2A wishes to provide general feedback and to formally acknowledge the Department's commendable efforts to incorporate natural hydrogen within the Petroleum Legislation of Western Australia.	DMPE thanks NH2A for providing a submission.
18.	The exploration and potential development of naturally occurring hydrogen have progressed steadily over recent years. It has long been recognised within the natural hydrogen exploration community that Western Australia hosts several geological domains conducive to the generation and retention of natural hydrogen. On behalf of its members, NH2A has therefore consistently advocated for the inclusion of natural hydrogen within Western Australia's petroleum legislative. Natural hydrogen prospectivity is not typically spatially aligned with hydrocarbon prospectivity. Consequently, areas of interest for natural hydrogen exploration in Western Australia do not necessarily overlap with areas designated for hydrocarbon exploration permits (Restricted Areas). As such, applications for natural hydrogen–specific exploration permits are expected, and it is preferable that they continue to utilise the established Special Prospecting Authority with an Acreage Option (SPA-AO) mechanism. Under the current SPA-AO framework, multiple applications may be lodged over the same area. The proposed regulations do not provide sufficient clarity regarding the process by which exclusive acreage options would be exercised where overlapping claims exist. This lack of certainty may deter investment and constrain the scope of data acquisition and knowledge-gathering programs proposed under SPA-AO applications. NH2A therefore encourages the DMPE to issue clear guidance on the resolution of overlapping SPA-AO claims, thereby enabling exploration activities to focus effectively on the acquisition of relevant subsurface data.	The PLAA24 introduces the ability to apply to add Regulated Substance Rights to an existing Petroleum Title or to apply for a new Petroleum Title which includes Regulated Substance Rights. This will allow proponents to apply for petroleum SPA-AOs and petroleum Exploration Permits with the intent of conducting hydrogen-specific exploration activities. These applications could include areas not spatially aligned with hydrocarbon prospectivity. The PGERA currently provides a framework for overlapping SPA-AO applications and the existing framework will remain unchanged by the PLAA24: – On the grant of an overlapping SPA-AO, DMPE on behalf of the Minister, must give notice of the grant and details of the exploration operations and conditions to the existing SPA-AO holder. – The respective title holders will have a six-month application period following their SPA-AO period within which to exercise the Acreage Option and lodge an application for an Exploration Permit, dropping 50 per cent of the blocks (which may itself resolve an overlap). – The permit application must be validly lodged, and then assessed as deserving of grant to be progressed to a Future Act notification under the *Native Title Act 1993* (NTA). – An application that can clear all pre-grant requirements, including any NTA processes, will be able to proceed to be granted exclusive petroleum rights (which if applied for will include Regulated Substance Rights). – An application to add Regulated Substance Rights to a Petroleum Title may also be made after the grant of the title.
19.	NH2A acknowledges its role in contributing to the development of a clear definition of a natural hydrogen discovery and in establishing industry best-practice guidelines for natural hydrogen exploration workflows. The Association remains committed to providing ongoing support to the DMPE in relation to the exploration and development of natural hydrogen resources in Western Australia.	DMPE is appreciative of NH2A's support

<table>
<tr><th colspan="3">Resman Energy Technology</th></tr>
<tr><th>Ref #</th><th>Comment</th><th>DMPE response</th></tr>
<tr><td>20.</td><td>I am writing to provide feedback on the Draft Mines and Petroleum Regulations Amendment Regulations 2025, specifically in relation to requirements for disclosure of chemicals and other substances injected into reservoirs or otherwise introduced downhole during petroleum and greenhouse gas (CCS) operations.</td><td>DMPE thanks Resman for providing a submission.</td></tr>
<tr><td>21.</td><td>After reviewing the draft regulations and the accompanying summary document, I note the following
1. The new GHG reporting schedules require licensees to report to the Minister
• the physical and chemical properties and amount of each substance injected into or extracted from an underground formation as part of “engineering enhancements”, on both a monthly and annual basis
• the chemical composition and physical properties of injected greenhouse gas streams and any incidental GHG related substances.</td><td>The new GHG reporting schedules, referred to by Resman in 1, that require licensees to report to the Minister are:
Resource Management and Administration Regulations
<table>
<tr><td>Sch 17, Div 3, item 6
Sch 17, Div 4, item 12
Sch 16, Div 3, item 4(d)
Sch 16, Div 3, item 10</td><td>the physical and chemical properties and amount of each substance injected into or extracted from an underground formation as part of “engineering enhancements”, on both a monthly and annual basis.</td></tr>
<tr><td>Sch17, Div 3, item 11(a)
Sch16, Div 3, item 9(a)</td><td>the chemical composition and physical properties of injected greenhouse gas streams and any incidental GHG related substances.</td></tr>
</table>
Environment Regulations
Regulation 6 of the Mines and Petroleum Regulations Amendment Regulations 2025 amends the term ‘activity’ to now also include greenhouse gas activities
<table>
<tr><td>Reg 15(9)</td><td>‘(9) The implementation strategy for an environment plan must include details of any chemicals or other substances that may be —
(a) in, or added to, any treatment fluids to be used for the purposes of drilling or hydraulic fracturing undertaken in the course of the activity; or
(b) otherwise introduced into a well, reservoir or subsurface formation in the course of the activity.</td></tr>
</table></td></tr>
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<table>
<tr><th colspan="3">Resman Energy Technology</th></tr>
<tr><th>Ref #</th><th>Comment</th><th>DMPE response</th></tr>
<tr><td>22.</td><td>2. The new “release of information from greenhouse gas reports” provisions require certain GHG report information to be published on WAPIMS, including parts of the annual GHG injection report, albeit with time delays.

However, I could not identify any provision in the draft regulations that

• explicitly requires public disclosure of the identity and composition of chemicals used or injected during petroleum operations (e.g., drilling, completion, stimulation, workover, scale inhibition, corrosion inhibition, tracers, or other production chemicals)

• clearly confirms that such disclosure will continue to apply to onshore petroleum and CCS projects, as under the current regulatory framework.</td><td>Current provisions for submission of chemical information:

Resource Management and Administration Regulations

<table><tr><td>Sch 1, item 8</td><td>8. Details of chemicals and other substances that may be — (a) in, or added to, treatment materials to be used for the purposes of drilling or hydraulic fracturing undertaken in the course of each well activity; or (b) otherwise introduced into a well or underground formation in the course of each well activity; or (c) otherwise used in the course of each well activity.</td></tr><tr><td>Sch 5, item 21</td><td>21. Details of chemicals or other substances kept on site for use in the well activity.</td></tr><tr><td>Sch 7, items 23 and 24</td><td>23. Treatment materials used.

24. Treatment material losses.</td></tr><tr><td>Sch 9, items 32 and 33</td><td>32. Drilling fluids used.

33. Drilling fluids losses.</td></tr></table>
A WMP (Schedule 1) is excluded information under regulation 82 of the RMA Regulations and permanently confidential. There are no provisions in the RMA Regulations for the release of daily well activity reports (Schedule 5). Final well activity reports (Schedule 7) and well completion reports (Schedule 9) may be released under Part 9 of the RMA Regulations.

Environment Regulations

Under regulation 15(9) of the Petroleum and Geothermal Energy Resources (Environment) Regulations 2012, Environment Plans for petroleum and , geothermal activities must include details of any chemicals or other substances that may be in, or added to, any treatment fluids to be used for the purpose of drilling or hydraulic fracturing; or otherwise introduced into a well, reservoir or subsurface formation during the course of the petroleum activity.</td></tr>
</table>

Resman Energy Technology		
Ref #	**Comment**	**DMPE response**
22.		Regulation 11 (7) requires that the operator must submit to the Minister for public disclosure a summary of the plan within 10 days after receiving a notification that the Minister has approved an environment plan under subregulation (5)(a). The following guidelines are currently available on the DMPE website to provide operators with further information regarding these requirements: • Chemical Disclosure Guideline (including the Chemical Disclosure Reporting Template). www.wa.gov.au/system/files/2025-02/env-peb-178.pdf • Environmental Risk Assessment of Chemicals. www.wa.gov.au/government/publications/environmental-risk-assessment-of-chemicals-used-wa-petroleum-activities-guideline These guidelines are being amended to incorporate the greenhouse gas amendments made to the three set of Environment Regulations.
23.	Given that Western Australia has historically required public disclosure of chemicals used in onshore petroleum activities (including for environmental transparency and community assurance), this omission raises two concerns: 1. It is unclear whether the intent is to maintain the existing public chemical disclosure regime for onshore petroleum and CCS projects, or 2. Whether the draft regulations inadvertently weaken or remove this requirement by omission.	Refer to response above for items 22.
24.	Accordingly, I respectfully like to clarify the following points • Does DMPE intend that the existing public disclosure requirements for chemicals used or injected in onshore petroleum and CCS operations continue unchanged under the new regulations ? • If so, where in the amended regulations is this obligation preserved or cross referenced ? • If not, what is the policy rationale for reducing transparency in relation to injected chemicals, particularly in the context of long term CO2 storage and groundwater protection ?	Refer to response above for items 21 and 22.
25.	Given the increasing focus on CCS deployment and community confidence in subsurface storage integrity, I would recommend that the regulations explicitly state whether injected chemical substances (beyond CO2 itself) are required to be publicly disclosed, and at what level of detail. Thank you for considering this submission.	Comment noted.

Resman Energy Technology		
Ref #	**Comment**	**DMPE response**
26.	Further to my submission of 29 January, 2026 regarding chemical disclosure under the draft Mines and Petroleum Regulations Amendment Regulations 2025, I would like to clarify the intent of my comments to avoid any ambiguity. My submission was not intended to recommend for unrestricted public disclosure of proprietary or commercially sensitive chemical formulations used in petroleum or greenhouse gas (CCS) operations. Rather, the main issue I wished to highlight is the for regulations to clearly distinguish between 1. Full and mandatory disclosure to the regulator (DMPE) of all chemicals and substances injected into the subsurface, including their identity, composition, and quantities, for the purposes of environmental protection, groundwater, well integrity, and long term CCS risk management and 2. The scope of information that is made publicly available, which may appropriately exclude proprietary formulations or commercially sensitive details, while still supporting transparency and community confidence. As currently drafted, the regulations clearly require reporting of chemical and physical properties of injected substances to the Minister, but are less clear on • whether all injected chemicals must be disclosed to DMPE across petroleum and CCS activities and • what subset of this information is intended for public release versus retention as confidential regulatory information. Given the increasing deployment of CCS projects in Western Australia and the importance of both regulatory oversight and protection of intellectual property, I recommend that the regulations would benefit from explicit clarification on this topic. Such clarification would provide certainty to operators, regulators, and the public, while avoiding unintended disclosure of proprietary chemical technologies. Thank you for considering this supplementary clarification.	Amendments are to be made the Chemical Disclosure Guideline referred to in item 22 to incorporate the greenhouse gas amendments to be made to the three set of Environment Regulations.

Woodside Energy Group Ltd		
Ref #	**Comment**	**DMPE response**
27.	Woodside Energy Group Ltd. **(Woodside)** refers to the Department of Mines, Petroleum and Exploration **(the Department)** public consultation on the draft Mines and Petroleum Regulations Amendment Regulations 2025 in relation to the *Petroleum Legislation Amendment Act 2024*. We welcome the opportunity to comment. Woodside understands the draft GHG Regulations aims to deal with a number of matters to facilitate and regulate greenhouse gas (GHG) injection and storage operations. As a participant in various joint ventures, Woodside holds five greenhouse gas assessment permits enabling carbon capture and storage (CCS) assessments in the Browse Basin, Northern Carnarvon Basin, Bonaparte Basin and Gippsland Basin. We also progressed three non-binding memoranda of understanding to enable studies of a potential CCS value chain between Japan and Australia. In 2025, Woodside signed a Storage Study Agreement (SSA) with Petroleum Sarawak Berhad (PETROS) to assess the technical and commercial feasibility of safely storing carbon offshore in Site 3A in Central Luconia, offshore Sarawak, Malaysia. Given the extensive and positive industry engagement to date by the Department, which supported a fit for purpose and robust outcome, Woodside's comments primarily address technical matters contained within the public consultation. Woodside also appreciates the effort of the Department to align State and Commonwealth regulatory frameworks as much as possible. Woodside welcomed the WA Government's release of the State's first CCUS Action Plan1 1 WA Government CCUS Action Plan Carbon capture utilisation and storage: Action Plan . We share your vision of CCUS opportunities diversifying our economy as part of the energy transition, and we agree that WA is well placed to become a world leader in CCUS by leveraging our existing infrastructure, expertise and geological formations. In this feedback, Woodside recommends the Department should: • Finalise the GHG Storage and Pipeline Regulations as a priority as key enabler of CCS. • Continue collaboration with stakeholders to develop guidance for the draft regulations once enacted. • Ensure adequate resources are dedicated, and invest in systems and processes, to streamline implementation and regulatory approvals obtention. Please note this response also provides feedback in relation to the Draft Annual Pipeline Performance Report for pipeline licensees – guideline and templates.	DMPE thanks Woodside for providing a submission.

Woodside Energy Group Ltd		
Ref #	**Comment**	**DMPE response**
27.	With respect to the Annual Pipeline Performance Reports (APPR), Woodside recommends this should avoid duplication with existing regulatory procedures or additional administrative burden and timing for submissions should be further considered (the current 30 days timeframe is too short and 90 days should be considered at a minimum). Woodside also draws the Department's attention to input it may receive from the Australian Energy Producers (AEP) and Chamber of Minerals and Energy (CME) WA.	
28.	**Amendment Reg 24 – Section 4 – Definition** Definition of "Engineering Enhancement Definition is broad but acceptable as it relates only to reporting (monthly and annually) ***of the physical and chemical properties and amount of each substance injected and extracted from an underground storage formation.*** Query whether "GHG injection operations" would be more appropriate.	The definition of engineering enhancement will be made consistent with the GHG I&S regulations. The term 'engineering enhancements' is used in item 4(d) of a monthly GHG injection report and item 10 of an annual GHG injection report to allow for the distinction between related substances and injected GHG substances (overwhelmingly carbon dioxide). Typically, these would refer to formation fluid extracted or injected as part of a pressure management system. The term 'GHG injection operation' is defined in the Act and would include engineering enhancement operations but does allow for the distinction between substances.
29.	**Amendment Reg 25 – Regulation 6** Change to allow for a person, in addition to an instrument holder, to make an application for a survey Query whether intent is to allow the applicant to undertake surveys	The intention of this amendment is to fix a strict compliance anomaly and allow for the applicant for an instrument to apply for approval to undertake a survey prior to being granted an exploration permit, drilling reservation (in this particular regulation), retention lease, production licence, special prospecting authority, access authority or an instrument of consent under section 116.
30.	**Amendment Reg 32 – Regulation 36** Use of the term "resources". No definition provided in regulations. Query whether the PLA Act 24 definition of "resources pool" is intended to apply.	The intention of this amendment is to replace 'petroleum pool' with 'resources pool' consistent with the amendments to the PGERA 67 to facilitate the introduction of regulated substance provisions. WA drafting protocol does not require 'resources pool' to be defined in regulations where it has the same meaning in the primary parent legislation (Act).
31.	**Amendment Reg 42 – Regulation 62** Deletion of regulation 62(3) removing the 2-hour notification timeframe for significant events. Change acceptable; request further context for deletion of 62(3).	An internal review of the timeframes when DMPE needs to be notified of significant events has concluded that the current timeframes are not necessary. Accordingly, the two-hour requirement in (3) has been deleted and the three-day timeframe in subregulation (4) has been extended to seven days.

<table>
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<tr><th>Ref #</th><th>Comment</th><th>DMPE response</th></tr>
<tr><td>32.</td><td>Amendment Reg 44 – Regulations 79A & 79B

Introduction of new reporting obligations.

No new schedules provided. Query scope (geological, geophysical, geotechnical, well planning, seismic).

Existing Schedule 2 (schedule 2 – Annual Assessment Report – Division 1 – Required information) already covers work, expenditure and results (for all work, evaluations and studies carried out in the title area) to be provided by the permit and lease holders.

To avoid duplication, suggest Department rely on RMA powers if further information is needed</td><td>New regulation 79A has been added to address the requirement for an instrument holder to provide a report demonstrating that it is performing work in compliance with the work program conditions on an instrument.

Work program conditions that relate to wells and surveys are captured under current regulations 74 and 78 respectively. There is, however, no provision to require a report for work program conditions outside these areas such as studies performed in an office or laboratory.

This new regulation is intended to promote transparency and information sharing within the new industries being introduced by PLAA24 (natural hydrogen and GHG storage) and ensuring that instrument holders demonstrate compliance with the work program conditions that were imposed on the grant of the instrument.

A schedule is not considered necessary as the report is based on the work program conditions that were set on grant of the title.

In regard to new regulation 79B, these reports are based on equivalent Commonwealth reports and regulations. Information requirements are provided in Schedule 17 as indicated in this regulation.</td></tr>
<tr><td>33.</td><td>Amendment Reg 45 – Requirement to submit the whole core within 12 months.

Regulation 80 (Table)

Appears to remove allowance to retain part of the core for samples and ongoing testing post drilling.

Suggest amending to “remainder of the core” and extending submission to 18 months post-rig release (consistent with Sidewall cores).</td><td>Following consideration of feedback received, item 2 in the table in regulation 80(1) has been amended back to the current requirement as

<table><tr><td>3.</td><td>Full hole conventional core</td><td>Remainder of the core</td><td>As soon as practicable after the expiry, surrender, cancellation, revocation or termination of the relevant instrument.</td></tr></table></td></tr>
<tr><td>34.</td><td>Amendment Reg 71

New definition of “Document”.

Suggest expanding definition to include other approved forms /applications. Especially as exemptions under s22 not included. PGR allows applications not captured in definition.</td><td>The definition of ‘Document’ has been amended to be more inclusive.</td></tr>
<tr><td>35.</td><td>Amendment Reg 75 – New Regs 27–32

Annual pipeline performance reporting framework

27(1) Suggest report date be agreed with Minister (not anniversary). This would allow all pipeline reports to be developed simultaneously in line with current operator practice.</td><td>DMPE agrees that specific provisions should be made for licensees to request approval from the Minister for a reporting period other than the anniversary date and has made the appropriate changes to these regulations.</td></tr>
</table>

Woodside Energy Group Ltd		
Ref #	**Comment**	**DMPE response**
36.	**Amendment Reg 85** Regulation name update Consider inclusion of "storage" in the title of these regulations given pipelines may only convey GHG through state waters with storage outside state waters (i.e. no storage).	These regulations take their name from the primary parent Act which will be the *Petroleum and Greenhouse Gas Storage (Submerged Lands) Act 1982*. The naming of the *Petroleum and Greenhouse Gas Storage (Submerged Lands) Act 1982* was deliberate to allow for, rather than exclude, greenhouse gas storage in the current *Petroleum (Submerged Lands) 1982* land areas.
37.	**Amendment Reg 87 – New Division 2A – Pipeline Performance Report** Annual reporting obligations. Same issues as Part 8 (reg 27–32): anniversary date rigidity, 30 day timeframe, combining reports term end date, and indefinite licence duration.	As per response to item 35 above, DMPE agrees that specific provisions should be made for licensees to request approval from the Minister for a reporting period other than the anniversary date and have made the appropriate changes to these regulations. Draft regulation 10B(1)(b) of the Petroleum (Submerged Lands)(Pipelines) Regulations 2022 allows for the provision of the submission of the annual pipeline performance report within another period (other than the default 30 days) upon the authorisation of the Minister. Draft regulation 10C of the Petroleum (Submerged Lands)(Pipelines) Regulations 2022 allows the licensee to combine APPRs with the written agreement of the Minister. This allows flexibility for licensees to report simultaneously across multiple titles.
38.	**Amendment Reg 101** Regulation 3(a)(iii). Proposed text replacement: replace or with and since its both within and, outside the storage formation for GHG substances.. (iii) Carried out in a way that reduces the risk of aquifer contamination and or, in the case of injection operations relating to greenhouse gas substances, aquifer contamination outside the storage formation.	The intent of this subregulation is to express the objective of reducing the risk of substances being introduced into (contaminating) an aquifer. In the case of greenhouse gas storage, substances (overwhelmingly carbon dioxide) are introduced into the subsurface. The use of 'or' instead of 'and' recognises that, particularly in the case of saline aquifer storage, greenhouse gas substances can, subject to approval, be injected into a storage formation and must be contained within the approved extent of that storage formation.
39.	**Amendment Reg 102 – Section 4 – Engineering Enhancement** Definition wording. 16. (1) (c) (ii) Query use of "individual" vs title/instrument holder. Broad definition acceptable for reporting; however, query if *GHG injection operations* wording may be more appropriate	The use of 'individual' is the preferred drafting approach. For second comment, see response for item 28.
40.	**Amendment Reg 108 – Regulation 16** Well Management Plan approval criteria. Query why "good oil-field practice" applies only to petroleum / recovery and not to GHG/CO_2 injection wells	The amendments to Regulation 16, where good oilfield practice only applies to petroleum well activities, follow current equivalent regulation 16(1)(c)(ii) in the PGER (RMA) Regulations where risks in relation to geothermal well activities are excluded from the requirement of being managed in a manner that is consistent with good oilfield practice. There is still the requirement in 16()1(c)(i) for the risks to be managed in accordance with sound engineering principles, codes, standards and specifications.

Woodside Energy Group Ltd		
Ref #	**Comment**	**DMPE response**
41.	**Amendment Reg 123 – Regulations 78A, 78B, 79A** Additional annual reporting requirements Reg 78A: No new schedules provided. Query scope (geological, geophysical, geotechnical, well planning, seismic). Existing Schedule 2 (schedule 2 – Annual Assessment Report – Division 1 – Required information) already covers work, expenditure and results (for all work, evaluations and studies carried out in in the title area) to be provided by the permit and lease holders. To avoid duplication, suggest Department rely on RMA powers if further information is needed. Reg 79A: Recommend that annual report is not mandated as calendar (or financial) year rather a 12-month period. These integrity reports take approximately 3 months to prepare so timeliness of issue should not be less than this after end of reporting period.	See response for item 32.
42.	**Amendment Reg 124 – Regulation 79** Core submission timing Same concern as Reg 45: Suggest amending to "remainder of the core" and extending submission to 18	See response for item 33.
43.	**Amendment Reg 144 – Schedule 16 – Division 2(e)** Daily pressure and temperature reporting Query whether requirements apply per well and why they are more onerous than for petroleum extraction activities. Request clarification of purpose.	Daily reporting is considered as standard practice for all injection operations, including GHG storage and underground petroleum storage, for pressure management, injectivity and containment. This information is required daily and per well. In general, this level of detail is not considered an essential requirement for petroleum recovery activities.

Government of Western Australia

Department of Mines, Petroleum and Exploration

8.30am – 4.30pm

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