

Questions from the Community to EPA to be presented at the September 2019 NGPCCC

Question 1

1a. When did the EPA last check that Santos' de Weeding & Seeding procedures that ensure their vehicles are free of weed seed were current?

1b. How often are these inspections conducted?

1c. Who completes the work and writes the reports of Certification?

1d. Where can these reports and Certification of Cleanliness be found?

1e. If a Contractors vehicle left the area of PEL238 and travelled interstate to another Gas Field or interstate gas related infrastructure, would that vehicle have to be cleaned down as per the above Certification process before re-entering the Pilliga and private lands that make up PEL238?

1f. Are there size and types of vehicles that are exempt for the above requirement?

Question 2

2a. Can EPA detail how they require Santos prepare for significant rainfall events, in and around the Narrabri Gas Project Area?

In April 2019 the Pilliga forest was subject to a significant rain event that caused material (mulch, ballast) to leave Santos fenced lease areas and enter the forest. Berms did not work as they should in controlling this run off.

2b. Have the areas listed below, some photographed, been cleaned up and the problems identified corrected?

Locations where material leaving site was witnessed to occur.

1. Bohena 6: GPS Location: 30°32'12.52"S 149°37'16.02"E
2. Bohena 5: GPS Location: 30°32'12.22"S 149°36'0.46"E
3. Bohena 3: GPS Location: 30°32'44.28"S 149°36'38.24"E
4. Bibblewindi West wells:
General GPS Location: 30°37'27.89"S 149°36'21.80"E (All well pads visited in this series of wells had run off issues. Bunding where installed appearing to have failed in mitigating run off (BW24).
5. Bibblewindi East wells:
BW12: GPS Location: 30°39'57.66"S 149°38'56.96"E (Bunding/mulch/woodchip issue)
6. BW13: GPS Location: 30°39'46.85"S 149°39'5.26"E (mulch/woodchip issue)
7. BW19: GPS Location: 30°39'37.60"S 149°38'49.95"E (run off into gully)
8. BW21H: GPS Location: 30°39'17.95"S 149°39'7.69"E (run off down road)
9. BW29: GPS Location: 30°40'34.33"S 149°39'15.78"E (mulch/woodchip issue)
10. BW16: GPS Location: 30°40'3.16"S 149°39'30.14"E (mulch/woodchip issue)
11. BW18H: GPS Location: 30°39'47.60"S 149°38'41.26"E (mulch/woodchip issue)
12. Pipeline joining Bibblewindi East to compressor (Self Camp Rd)
GPS Location: 30°39'30.79"S 149°38'50.15"E (bunding/run off mitigation failure/mulch/woodchip issue)



Above: Bohena 6 – mulch has flowed across and off the site leaving the interior of the site bare



Figure 1 BW 22 mulch leaving lease area



Above: Bibblewindi 24 – coir log is failing to mitigate erosion and flow of material across the site



Above: Bibblewindi 12 – coir log is failing to mitigate erosion and flow of material across the site



Above: Bohena 3 – Example of material outside of enclosure, the seedling has died but the wire, plastic & bamboo remain



Above: Bohena 3 – abandoned material inside of enclosure

2c. Does the EPA intend to prosecute Santos for the litter from their operations located and photographed wholly within the Pilliga State Forest?

Question 3

In 2010 the then regulator informed the then PEL238 operator that a number of ponds and pads were allowing rain/storm water to traverse the well sites and enter the surrounding areas of forest and private lands and that suitable measures must be taken to eliminate the problem. The Operator did some work to please the then Regulator.

The Dewhurst North (Dewhurst 22-25 including Dewhurst 6) gas field also had a problem with run-off rainwater entering and leaving the well pads, (identified and reported by a member of the community) so much so that the Regulator required that Bunds on the high and low sides of all well pads were made a requirement. These were constructed as per the Regulators instructions.

Concerns centre around the very real possibility of pollution of the surrounding Forest and private lands with salts from any spilt produced water and other material from the partial and full rehabilitation being carried out, the carry-over of fertilizers and other non natural material, such as treated wood chips as found at all the Rehabilitation, into the Forest and Private lands which may cause an acceleration or deceleration of natural growth of the surrounding natural Pilliga Forest vegetation.

3a. Are these Bunds still able to perform the function for which they were intended?

3b. When was the last time Santos checked these Bunds and repaired as required?

3c. Is the current Regulator aware of the requirement to have these Bunds and when did the Regulator last inspect the above mentioned well pads and all the other well pads under Santos' control to ensure that rain/storm water does not leave the well pads?

3d. Has the Regulator insisted that Santos take a before and then regular soil samples from the areas surrounding all the rehabilitation sites to ensure that there has been no effect from the rehabilitation process on the surround soils and vegetation.

3di. If this soil sampling is being done, What is the frequency and, Where can the information be found on the Regulators web sites?

Question 4

The EPA along with others requested more information than that supplied by Santos in their RTS.

Santos Responded in a Supplementary Response to Submissions, which has recently appeared on the Narrabri Gas Planning Portal.

4a. Is the EPA fully satisfied that ALL of the concerns raised in their Request for further information document, also available on the Narrabri Gas Planning Portal page, have been answered fully and are satisfactory in Santos' Supplementary Response to Submissions document?

4b. If not, will the EPA detail what concerns still need to be addressed?

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Delegate to the NGPCCC for People for the Plains and the wider concerned Community.

5th September 2019