



Our reference: EF15/67818: DOC 15/135778

Mr A J Pickard
PO Box 830
NARRABRI NSW 2390

Dear Mr Pickard

I refer to your notification to the Environment Protection Authority (EPA) on 1 February 2015 regarding a discharge of produced water from a high point vent located on the Dewhurst South flow line, within Santos' Narrabri Gas Field. The EPA has investigated this matter and I am writing to inform you of the outcomes of the investigation.

The EPA's investigation focused on determining the scale, nature and cause of any discharges of produced water from the high point vent (referred to as HPV DW1127 W1). It also considered whether Santos was in breach of the *Protection of the Environment Operations Act* (POEO Act) for not notifying the EPA of the discharge of produced water from the vent. The EPA has also investigated whether there was any evidence that hydrogen sulphide gas is being emitted from the vent.

As part of the investigation the EPA inspected the premises and the vent and served Santos NSW (Eastern) Pty Ltd with two s193 Notices to provide information and/or records relating to the incident. The EPA also met with and interviewed other relevant parties. In this regard, the EPA appreciates the information that you provided.

The EPA's investigation determined the following:

- On 29 January 2015 Santos became aware of the discharge of produced water from the vent, immediately isolated the vent and commenced a clean-up of the impacted area. This clean up involved the use of approximately 50 litres of water to hose down the infrastructure and the removal of all of this soil and water from the site.
- On 2 February 2015 Santos conducted a second clean-up of the area.
- The investigation could not confirm the volume of water that was discharged from the vent. However, the EPA is of the view that a small volume of produced water was emitted, but there is no evidence to suggest it left the premises and the impacts appeared to be confined to the immediate vicinity of the vent and its enclosure.
- The EPA has concluded that a mechanical failure of the vent has resulted in the release of produced water from the vent.
- Santos did not notify the EPA of the incident as it believed that the spill was minor in nature and did not constitute material environmental harm. The EPA's investigation concluded that the incident did not meet the definition of material harm to the environment under s147 of the POEO Act and, as such, Santos was not required to report the incident to the EPA.


- The EPA's testing to date has found no evidence to support the allegation of hydrogen sulphide gas coming from the vent. The EPA is, however, continuing to test for hydrogen sulphide gas at various points across the Narrabri Gas Field.

In view of these findings, the EPA has concluded that the level of environmental harm was very minor and that Santos has taken timely and appropriate action to clean up the discharge. In this context the EPA is requiring Santos to undertake a full maintenance check of the flow lines and vents on the Narrabri Gas Field and conduct any maintenance required immediately. The EPA is also requiring Santos to develop and implement an inspection and maintenance plan for its flow lines and associated infrastructure, which will be subject to approval by the EPA.

Both of these actions are currently being added to Santos' Environment Protection Licence (No. 20350) as Pollution Reduction Programs, which will be monitored and enforced by the EPA.

If you have any questions, or wish to discuss this matter further, please contact Jessica Creed, A/Unit Head – Coal Seam Gas in the Armidale EPA office by telephoning 02 6773 7000.

Yours sincerely



GARY DAVEY
Director - North
Environment Protection Authority

Tony Pickard

From: "Jessica Creed" <Jessica.Creed@epa.nsw.gov.au>
Date: Monday, 18 May 2015 10:54 AM
To: <deere@activ8.net.au>
Cc: "Brett Nudd" <Brett.Nudd@epa.nsw.gov.au>
Attach: Outgoing - Letter - Tony Pickard - notification letter for the investigation out come HPV dewhurst south Pilot.PDF
Subject: Santos High Vent Discharge Investigation

Hi Tony,

Thank you for your notification to the EPA about a discharge from the high point vent on the Dewhurst South flow line at the Narrabri Gas Field.

Please find attached correspondence regarding the EPA's investigation into the matter.

If you have further questions please give me a call.

Regards

Jessica Creed

A/Head – Coal Seam Gas | **NSW Environment Protection Authority** |
85 Faulkner Street (PO Box 494) Armidale NSW 2350
☎: (02) 6773 7000 | Mobile ☎: 0409 831 040 | 📠: (02) 6772 2336 |
✉: Jessica.Creed@epa.nsw.gov.au

Please note I do not work Fridays

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