

Santos Narrabri Gas Project CCC **Information Request Response**

Reference:	28a.1 Information in response to questions raised in the August CCC
	meeting and submitted in writing on 29 September by the People for
	the Plains delegate
Requests and	Question 1 – PAL 2:
Responses:	Is PAL 2 title pending?
	a) If so then when will the application for renewal be made?b) If the application has been made then what is the reason for the delay in approval being granted?
	Answer:
	All of Santos' NSW petroleum licences are in full effect. None of them, including PAL2 are pending. Renewals have been applied for and the government is processing the applications along with the EIS for the NGP.
	Question 2 – Rehabilitation:
	 a) The 2012 Rehabilitation Plans approval ran out in 2015/16, has Santos submitted new Rehabilitation Plans? b) If Santos has submitted new Rehabilitation Plans then when were they submitted and when will these plans be made available to the public?
	Answer: Santos has not submitted new rehabilitation plans to replace the 2012 plan.
	 Question 3 – Schedule 3 of the "Specific Environmental Conditions" for the original approval for the Dewhurst Exploration Pilot, has a section under "Water Supply" that relates to "Compensatory Water Supply". a) Has Santos report any local land owner groundwater issues? b) If there a report made, then what was the result of this report? c) If no report was made, as required, then why was the matter not reported?
	Answer: There has been no trigger for this condition. No new wells have been drilled under this approval and DWH 13-18 pilot has not been operational since this approval was granted.
	 Question 4 – Groundwater monitoring a) Will Santos explain with full details what they are monitoring for and the locations of all the monitoring bores along with the depths at which the monitoring takes place as well as providing the Application and Approval documents for this monitoring? b) Are the conditions monitored the same as on the Santos Water Portal site, these being EC, pH, SWL to surface and TDS by
	calculation?

c) Does Santos do any other regular water condition monitoring other than the above a its electronic monitoring sites and if so; what is the regularity of this monitoring; where can the results be found by the general public; and what is the analytical extent of the monitoring and does this include Bacteria counts?

Answer:

- a) Santos is monitoring water head and water quality as relevant to Santos' operations. The measurements are to verify the baseline and any impacts (to the deep coal aquifers) and monitor the shallower aquifers (alluvium and sandstone) where relevant data can be best applied to the regional ground water model.
- b) No sometimes Santos takes a more comprehensive suite of data for its records.
- c) Santos monitors multiple locations at regular intervals for its own records. Depending on the circumstances, some water can be sampled daily (e.g. Leewood) and in other locations much less frequently (e.g. annually at a farmer's bore). Santos cannot release all this data publicly as it's not always Santos' data to release (e.g. a farmer's water bore data)

Question 5 – from the Mod 5 approval

Under section 5 of the Wilga Park time extension approval there is a section that states that signage indicating contact phone number, postal and email addresses should be displayed at the entrance and be clearly visible. The purpose behind such a requirement is to enable the public to report an incidents to the dedicated company reporting medium. In the case of the Wilga Park time extension this requirement has been met. Why is this requirement not part of the Dewhurst and Bibblewindi Pilot time extensions approvals?

Answer:

Santos' signage is in compliance with all regulations. Any questions on the regulatory differences between gas wells and electrical power plant should be directed to the government regulator.

Question 6 -

- a) Will Santos provide to the community, access to the "Operations Environmental Operation Plan" as described in the Time extension Approval for the Mod 5 Wilga Park?
- b) Will Santos provide the community the current "Narrabri Gas Field Groundwater Monitoring and Modelling Plan" as outlined in Schedule 3, Specific Environmental Conditions for the Dewhurst Exploration Mod 1, especially noting the revised monitoring in relation to Cass 2 or Cass 3 models?

Answer:

- a) It will be publically available once it is approved.
- b) The wells that are the subject of the approval that you refer to are yet to be drilled. Therefore, the requirements concerning the groundwater monitoring and modelling plan, to which you also refer, has not been triggered.

Question 7 -

At the 2017 June and August NGP CCC's, Mr P Mitchley stated that Santos would not be answering concerns raised in submissions in relation to the disposal of the by-product of Reverse Osmosis, the salts as the disposal of this material was being looked after by a contractor and therefore not part of proposed Santos Narrabri Gas Project operation.

- a) Will Santos now revise this answer in light of the ABC program "Trashed" and the recent "IESC" report?
- b) Will Santos now also not answer concerns raised in responses to the EIS concerning the Reverse Osmosis Plant and water treatment as this operation is also contracted out?
- c) If Santos is prepared to answer questions around the RO plant then why not those around the disposal of the salts?

Answer:

Santos is preparing a response to the various submissions raised in relation to the NGP EIS, including those comments raised by the IESC. The response will be provided to the DPE in due course in accordance with the NSW Government's assessment process.

Question 8 – Fugitive emission monitoring

- a) Is Santos or has Santos commissioned a third party to do fugitive emission monitoring in order to update an earlier study?
- b) What is the frequency of this study and over what time duration will it be done?
- c) Will any results be made available to the community in real time?
- d) Will the emissions from all along the produced water pathway be included in this monitoring (for example; well head expansion chambers, open hatches and vents on all balance and storage tanks as well as the open ponds. In general any location where produced water has exposure to the atmosphere)?
- e) Will the monitoring of the fugitive emissions from the produced water path now be monitored by the EPA, if so then what will be the frequency and will the data be made available to the community and if it is what will be the time period between monitoring and the results being available?
- f) If the EPA is not going to monitor the fugitive emissions from the produced water pathways (as is currently the case) then why is the EPA not carrying out this monitoring?

Answer:

- a) No. Fugitive emissions in the NGP area have already been comprehensively studied by very well-respected and credentialed academics and scientists from CSIRO.
- b) c) and d) all not applicable

Parts e) and f) refer to the EPA

Briefing Officer:	Neale House
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