

20180417

Question to DRE.

Why are known sites Bohena 8, 10 and 11 absent from the database

https://geo.seed.nsw.gov.au/Public_Viewers/index.html?viewer=Public_Viewers&locale=en-AU&runWorkflow=AppendLayerCatalog&CatalogLayer=Industry_Map_Catalog.78.Bore

Holes (Status)? Recent inspections show these sites have extensive rehabilitation, with recent Santos activity at these sites including irrigation and ripping of the ground. Was there any spillage or fracking activity undertaken at these sites?

20180417

Question to Department of Planning and Environment

At The 2015 December 8th CCC a representative from the Department of Premier and Cabinet addressed this CCC on the procedures around the Santos EIS for the Narrabri Gas Project. In his address he informed the assembled that there were going to be THREE (3) opportunities for the Community to question matters arising from the EIS.

Q. Is this still the case and what is the timing and location within the process, for these three (3) referenced opportunities?

Q. Will the Community be given time to read and respond to the upcoming Response to Submissions on the EIS for the Narrabri Gas Project?

Q. if the Response Document is a lengthy Document as was the EIS, will the Community be given sufficient time to read and respond to those responses?

2180417

Questions to EPA re P&A

I realise that aquifer cross connection due to CSG Industry activities verses the Agricultural Industry and Town water bores is a controversial subject so my questions are based solely on the requirements placed upon the Gas Industry by the various Regulations both Governmental and Best Industry practice.

These questions are directed at Plug and Abandoning but can be applied to those wells that are already drilled and either producing or shut down temporally..

At the GISERA workshop on P&A held last year we heard from the EPA Representative that the P&A Requirements and Procedures in NSW were in the process of being reviewed and rewritten.

Q. Is this the case, and if so, then when will the new P&A Requirements and Procedures made available to the Community for comment and what is the time frame for enactment?

Q. or: Has the whole Review/rewriting been put aside for the time being?

At the same workshop we heard that "wire logging" of a gas wells that were to be P&A was not a requirement under the current Regulations and was only carried done only on a "site specific" basis as directed by the Regulating Authority and as such wire logging was not applied to all wells that had or were to be P&A.

Q. If this is the case, and I have no reason to doubt the EPA Representative, then how can the EPA and other NSW Government Departments along with the Gas producer, in this case Santos, guarantee that the gas wells outer cement to natural strata still complies with the World's Best Practice of construction and that the outer cement sealing is still bonded to the natural surface at all levels to and beyond the GAB floor at time of P&A and is not likely to fail in the future with the resulting cross aquifer connection?

This series of questions relate specifically to PEL 238 and more specifically to, and adjacent to, the proposed Narrabri Gas Project Area

The Oil and Gas Industry leader Schlumberger, both on its web site and in its publication "Oil Industry Review", which covers both the Oil and Gas industries, devotes a lot of space to the Bacteria known as Sulphate Reducing Bacteria (SRB) and the destructive effects that that have on the Industries infrastructure, as well as carrying a warning about the spread of the Bacteria by the drill rigs and drilling fluids, the latter is also a source of "food" for any SRB that may be naturally occurring in the local groundwater adjacent to the drilling operation. I refer you the Chapter 11 of the Narrabri Gas Project, 'Groundwater and Geology' specifically page 11-53 *Impacts from Drilling Fluids*, I also draw you attention to a recent question to Santos raised recently in the NGPCCC with regard to the use of Sulphate Reducing Bacteria Resistant Cement for the outer well casing to the natural strata sealing. No reply from Santos has been forth coming re that question.

In the light of the above and more information concerning these Bacteria and other associated Bacteria that are known to destroy CSG infrastructure, I ask the following.

Q. Has there been a comprehensive over time testing of the groundwater in the area of the NGP for Bacteria of all types? If there has been a comprehensive over time testing, can the EPA provide the results of the tests and a location map indicating where the Bacteria were found?

Q. What steps are being taken to monitor the levels of these Bacteria and other Bacteria, at well sites in PEL 238, that have or are about to be P&A?

Q. Will groundwater quality be monitored at each P&A site if so at what depths and at what locations on the P&A well pad?

Q. Over what period of time will this groundwater quality be carried out and for how long?

Q. If Bacteria and water quality monitoring is to be carried out and problems with the outer cement casing are encountered leading to aquifer connectivity, then what measures have been put in place to correct this situation?

Q. Given that no studies have been recently carried out to determine the directional flow of the groundwater in the Project area, how will the sites of any groundwater monitoring bores be determined?

Q. What compensation will be available to any groundwater user should problems arise with the groundwater and be traced back to a P&A Gas well?

Q. Will the EPA assist in determining the cause and source of any groundwater quality or Bacterial Count changes should any changes to either occur in and around the Narrabri Gas Project Area?

Q. The same question applies to groundwater not currently being used or accessed?

To Santos

Question to Santos at the April 2018 NGPCCC

From the February 2018 Meeting Summary

- Representative from People for the Plains tabled a question directed to Santos from a member of that group in relation to Sulphate Reducing Bacteria which will be responded to out of session.

31.5 Questions tabled by PFTP to Santos – Sulphate Reducing Bacteria STO

Q. When will I get the response concerning the levels of SRB in the Aquifers surrounding the gas wells?
The initial response to my question was did not answer the original question, which was a question around the levels of SRB in the groundwater on the outside of Santos' Gas wells.

When the question was resubmitted Santos was provided with a water analysis that Santos had provided to the earlier Santos CCC which showed SRB in a Santos operated water bore at Bibblewindi which is very close to Bibblewindi 1 and another at Bibblewindi 5.

Can I please have the response in writing as indicated by the referenced Action number 31.5?

From the April monthly Activities Update

Q. Why is the Lucerne crop at Leewood not being irrigated?

Santos in the REF for Leewood Produced Water Treatment and Beneficial Reuse Project (Leewood Phase 2) put forward a business case to grow a Lucerne crop to absorb most of the treated water and as such the time taken for any passage of salts into the ground water table would be long compared with say growing Wheat/Cotton rotation. (500 years verses approximately 50years).

Q. What will Santos now use the Treated Produced Water for if not to Irrigate a 5 cut per year Lucerne crop the was expected to return to Santos and the local economy economic benefits along with employment.

In the Information Request Response dated 22 February 2018 concerning the Lucerne Crop and the sale of that crop Santos' answer indicated that Santos never had any intention of selling the Lucerne to make a return on it. Yet in the REF, named above, Santos mounted a strong business case based on 5 cuts of Lucerne per year "which will increase the net productivity of the area from the current low productivity pasture (table 5.4)". [Reference page 27 of the Beneficial Reuse Project Agricultural Impact Statement]

I will also point out that the REF in question went to great lengths right throughout the document to point out the Benefits to the Local Economy and employment of using the Treated Produced Water from the coal seams.

Table 5.4 gives a total benefit from the Lucerne over and above grazing as being \$113,974.00.

This Business Plan would have increased the prospects of having the REF approved.

Q. As the response to the question indicates that the first cut was not sold and the responses to questions 3&4 indicate that the Lucerne was not grown for stock feed then why did Santos place into the REF information that would indicate that a good financial return would be made from Lucerne irrigated with Treated Produced Water from the coal seams?

Q. Will Santos inform this CCC and the inquiring members of People for the Plains what happened to the plant matter that was the First Cut Lucerne?

This question has been asked of both Mr D Banks and Ms A Moody, both had not responded.

Q. Will Santos now concede that the Lucerne experiment was an ill-advised venture or is Santos planning to keep growing Lucerne as per the REF, using the Treated Produced Water?

Last year Mr P Mitchley informed this CCC that Santos would not be responding to the following matters raised by a Government Department and the broader community.

These being: The Salts disposal, The Power and Compression Station, the Pipeline (The latter is understandable as it is not part of the Project EIS).

Q. In the Response to Submissions on the EIS for the Narrabri Gas Project, Is Santos still of the view that it will not answer concerns regarding the Salts and the Power/Compressor Station and if so what are the reasons for this decision?

Please note

These questions and those that have proceeded, are just a very small part that shows that the local and wider community have many concerns and are willing to ask questions.

Santos' lack of Responses to even the basic questions only fuels the fire of community outrage and mistrust.

Santos' alteration of the initial applied for Exploration Activities and the total lack of transmission to the whole community concerning alterations to what was applied for and approved only increases the mistrust in the whole CSG Industry by the local and wider communities and strengthens their resolve that CSG is not for Narrabri or indeed anywhere else in NSW including 'Off-shore'.