

Action Item 32.2 – Question to EPA (redirected to DRG/Resource Regulator)

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 temporarily..

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?

Note: These questions were redirected by Government to DRG/ Resource Regulator for response.

Questions to DRG/ Resource Regulator

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.

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?

Plug and Abandonment (P&A), also known as decommissioning of coal seam gas wells is dealt with specifically through ‘The Code of Practice for Coal Seam Gas Well Integrity’ section 4.9 and ‘The Work Health and Safety (mines and Petroleum Sites) Regulation 2014 section 127A and Schedule 3 section 32.

The Code of Practice for Coal Seam Gas Well Integrity was reviewed at a high level as part of the Improved Management of Exploration Regulation (IMER) process. No changes to the Code were made. Further information regarding the IMER process can be found at

- <https://www.resourcesandenergy.nsw.gov.au/miners-and-explorers/codes-and-guidelines/imer>
- <https://www.resourcesandenergy.nsw.gov.au/landholders-and-community/coal-seam-gas/codes-and-policies/imer>

The Code of Practice for Coal Seam Gas Well Integrity is subject to inter departmental reviews as necessary, to date no changes have been made to the Code since it was published.

Question

Or: Has the whole Review/rewriting been put aside for the time being?

See above

Question

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The Code of Practice for Coal Seam Gas Well Integrity does not currently require mandatory logging of a well prior to plug and abandonment. Any subsequent review of the Code will look at the mandatory requirements and determine whether they are in-line with best industry practice at the time.

Determining the efficacy of a cement job (i.e. the successful placement of cement behind the casing string) is based on several elements that are addressed during the construction of the well.

As such, determination of how to ascertain this should be conducted on a site-specific basis, whereby wireline logging might not prove the best option in all cases.

The Code of Practice for Coal Seam Gas Well Integrity requires that the department be notified if cementing objectives cannot be verified. Remediation work must then be undertaken and measures put in place to ensure the wells’ integrity for its lifetime. This is also a notifiable requirement under Section 179 of the Work Health and Safety (Mines and Petroleum Sites) Regulation 2014.

Issues related to cementing are addressed during the construction of the well. The well will continue to be monitored throughout its lifecycle as part of the operator’s relevant management plans.

Under the Work Health and Safety (Mines and Petroleum Sites) Regulation 2014 operators are required to submit their Plug and Abandonment plans for the well prior to undertaking the activity. At this point both the Resource Regulator and EPA assess the adequacy of the proposed activity (including assessment against the Code of Practice for Coal Seam Gas Well Integrity and NSW Aquifer Interference Policy).

Based on a risk assessment the operator may select wireline logging as a tool to evaluate the cement, however other options may prove more beneficial, such as temperature sensing, annular pressure monitoring, offset well review, etc. The EPA and RR have regulatory tools available to ensure the evaluation of cement will meet the operator’s obligations to demonstrate well integrity under the Code.