



Narrabri CCC Monthly Update

JULY/AUGUST 2018

The following is a monthly update for the Narrabri Community Consultative Committee (CCC) regarding activities undertaken by the NSW Environment Protection Authority (EPA) relating to PEL 238, PAL 2 and PPL 3 (Narrabri Gas Project).

It includes activities relating to the regulation of Environment Protection Licence (EPL) 20350 and the EPA's functions conducted under the NSW Gas Plan.

Attachments to this month's update:

- Running Log – Old Investigations of PEL 238 Outcomes
- Inspections undertaken by EPA – July 2018
- EPA Site Inspection Map – July 2018
- Inspections undertaken by EPA – August 2018

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EPA ACTION ITEMS SINCE LAST NCCC

No new items.

INVESTIGATIONS

Background

On 19 February 2013 the EPA became responsible for investigating environmental incidents that occur during coal seam gas activities under the provisions of the *Protection of the Environment Operations Act 1997* (POEO) and issuing Environment Protection Licences (EPL) for coal seam gas activities.

On 1 July 2015 the EPA commenced a new role as the lead regulator for compliance with, and enforcement of, conditions of approval for gas activities in NSW. This includes regulating consent conditions and activity approvals issued by other agencies (excluding work health and safety). In carrying out this role the EPA works with the relevant experts and NSW Government agencies.

Gas activities must comply with a broad range of regulatory controls, including Acts, regulations, codes of practice, titles, approvals and other controls.

The prioritisation of investigations is determined using a risk assessment for investigations that considers the level of environmental impact and the likelihood of environmental harm occurring.

DOC17/401204

Current Investigations

The EPA is continuing the ongoing investigation on the matter related to approvals required by Santos for the irrigation activity at the Narrabri Gas Field. Santos have temporarily ceased irrigation at Leewood following discussions with the EPA, with no evidence of environmental harm identified.

Running Log – Old Investigations PEL 238 and PAL 2 Outcomes

Incident	Outcome
<p>February 2018 <u>Crop Health at the Leewood Facility</u> The EPA investigated the Leewood facility following a community complaint on 9 February 2018 that raised concern about the alleged poor condition of the Lucerne crop being irrigated at the Leewood facility.</p>	<p>EPA officers inspected the Leewood facility on 12 February 2018, and reported that the irrigated crop appeared to be healthy and relatively uniform across the irrigated area. The matter was finalised, as no environmental harm was identified from the inspection that warranted further investigation. The EPA advised the complainant of the outcome of the inspection.</p>
<p>December 2017 <u>Crop Health at the Leewood Facility</u> A community complaint was received on 27 November 2017 regarding alleged poor condition of the crop being irrigated at the Leewood facility and concerns about the high level of water in one of the Leewood Ponds. NSW EPA officers attended the Leewood facility on the 15 December 2017 to check the irrigated crop, and were satisfied that the growth of the irrigated crop appeared to be healthy and was relatively uniform across the irrigated area. An inspection was also undertaken at the Leewood Ponds on the same day, and EPA officers confirmed the produced water levels were within operating capacity. Water levels in the ponds can often fluctuate dependent on several factors including the weather, water treatment at the Reverse Osmosis Plant and the irrigation activities taking place at the time.</p>	<p>Following the inspections at the irrigated crop and produced water ponds, the EPA were satisfied that the crop was in good health and observed no environmental concerns during the inspection that would warrant further investigation. The EPA advised the complainant of the outcome of the inspection.</p>
<p>August 2017 <u>Crop Health at the Leewood Facility</u> The EPA is liaising with Crown Lands and Water on a matter raised with the EPA relating to approvals required by Santos for the irrigation activity at the Narrabri Gas Field. Multiple approvals and licences are currently in place for the irrigation activity including an Environment Protection Licence.</p>	<p>The results from the initial round of monitoring, as required by the Environment Protection Licence, has been submitted to the EPA. The EPA has reviewed the data and confirmed that the irrigation water meets the monitoring requirements of this Licence.</p>
<p>June 2017 <u>Bohena 13C and Bohena South 2C (PAL 2)</u> The EPA undertook a review of Bohena 13C and Bohena South 2C following the submission of ESF2 rehabilitation relinquishment documents from Santos. The EPA undertook unaccompanied inspections of the sites, and followed up on some matters with Santos regarding the rehabilitation status of the sites. A community call to the EPA Environment Line was also lodged with regards to Bohena 13C.</p>	<p>EPA officers re-inspected both sites. No environmental harm was identified from the inspections, with the matters finalised and no further action considered necessary. The EPA also sent a response letter to the complainant advising the outcome and finalisation of the matter at Bohena 13C.</p>

<p>February 2017 <u>Groundwater pH levels at Dewhurst 14C (EPL 20350)</u> The EPA investigated data from groundwater monitoring bore, Dewhurst 14C, following an Environment Line call on 17 February 2017 that raised concern about data published on the Santos Water Portal, showing alkaline results (pH>9.5) for water samples collected from monitoring well Dewhurst 14C.</p>	<p>An EPA investigation showed the findings indicated the alkaline pH reported for Dewhurst 14C was the result of local geological and groundwater conditions, and that there was no evidence that the groundwater chemistry in Dewhurst 14C had been modified because of water pollution. The investigation has been finalised, with no issues identified.</p>
<p>February 2017 <u>Tintsville Flare Incident (PEL 238)</u> On 24 February 2017, the EPA were notified by Santos of an incident relating to unauthorised access to Wilga Park, resulting in damage to the Tintsville Flare.</p>	<p>Investigation confirmed that the gas pipe had not been ruptured and there was no environmental harm. The EPA has concluded its investigation.</p>
<p>December 2016 <u>Leewood Northern Sediment Dam</u> EPA Officers Investigated Leewood Northern Sediment Dam following an Environment Line call alleging an overflow incident from Leewood Ponds Water Treatment Facility.</p>	<p>Incident was investigated and samples taken, with lab results confirming no BTEX present and the materials classed as organic; dried sun bleached algae; and a naturally occurring protozoa. Investigation finalised, with no issues identified.</p>
<p>November 2016 <u>Bohena Creek</u> Report alleging that Bohena Creek was impacted by the Bibblewindi Water Treatment Plant and gas wells.</p>	<p>EPA officers visited the area of Bohena Creek that the reporter referenced. There was no evidence that environmental harm has occurred.</p>
<p>September 2016 <u>Leewood (PAL002)</u> Report alleging Leewood produced water dams were overflowing.</p>	<p>The EPA officers visited the site and all ponds were observed to be operating with adequate freeboard. There was no evidence of any overflow or spill from the ponds.</p>
<p>September 2016 <u>Bohena 2</u> Report alleging Santos were using produced water from Leewood for watering program at Bohena 2 salinity site.</p>	<p>Environment Line complaint alleging Santos were using produced water from Leewood for the watering program at Bohena 2 salinity site following a Namoi Waste truck seen leaving Leewood and heading to Bohena 2 salinity site. EPA Officers attended the site, investigated and took water samples. Lab results indicate that the source of water is not consistent with produced water. The EPA sent a response letter to complainant advising this.</p>
<p>April 2016 <u>Bohena Creek Road</u> Methanol Drum on road.</p>	<p>Santos staff located a 44 gallon drum labelled 'Methanol' dumped on Bohena Creek Road near the Leewood Water Treatment Facility. Police and HAZMAT attended and secured the item. The drum was not on the Santos site, nor related to its activities as per media Tweet by the EPA.</p>
<p>March 2016 <u>Leewood Pond</u> Alleged leaking.</p>	<p>EPA officer inspected storage ponds and met with Santos staff. No evidence that produced water was leaking. No further action was required.</p>
<p>March 2016 <u>Bohena Creek Road</u> Report that a vent had been left open, unattended and emitting methane gas.</p>	<p>Santos has approval to vent gas from high and low point vents along the water gathering lines for safety and operational purposes – this is performed manually by a field operator. Santos has amended the manual venting operating procedure. The procedure clearly notes that a high point vent is not operated without an operator present.</p>

<p>March 2016 <u>Santos Pilliga</u> Report received that there was a 'foamy residue' left along Beehive Road. The complainant returned to the site some days later with a Geiger counter and recorded a reading allegedly linked to the high and low point vents.</p>	<p>An EPA Officer spoke to the complainant who advised that the location they took the Geiger counter reading was a few kilometres away from the area of concern and there was no evidence to support the initial claim. No further action required.</p>
<p>March 2016 <u>Leewood Water Treatment Facility</u> Report alleging a truck was spraying produced water between the internal fence and the property boundary fence for dust mitigation.</p>	<p>An EPA Officer viewed available data confirming raw water from an on-site bore was used for dust suppression at the time of the allegation. The EPA supports dust suppression which is a requirement of the Santos EPL. No further action required as at 15 March 2016.</p>
<p>February 2016 <u>Santos Pilliga</u> Report of 35,000 litre spill at unmanned Santos facility.</p>	<p>Investigations proved minor water run off with no environmental or health risks. Media release: Water Run-off From Leewood Water Treatment Facility in Narrabri Cleaned Up</p>
<p>January 2016 <u>Leewood Water Treatment Facility</u> Alleged discharge of sediment laden water.</p>	<p>The rainwater discharge followed heavy rain. Santos undertook immediate works to prevent further discharge from the site installing coir mats and construction of bunding. The EPA inspected site and determined no environmental harm had occurred and that no regulatory action was required.</p>
<p>January 2016 <u>Santos Pilliga</u> Report a 'foamy caramel coloured' material on the roadside near operation site.</p>	<p>The EPA inspected the site and collected samples. Analysis determined it was a natural event, likely due to the decomposition of organic material. No further action was required.</p>
<p>September 2015 <u>Bohena Creek</u> Piezometer located in creek.</p>	<p>No regulatory action required.</p>
<p>January 2015 <u>Santos Dewhurst Southern</u> Water flow line.</p>	<p>No breach of EPL 20350 identified. Santos varied operational practices for high point vents following negotiations with the EPA. Media release: No environmental harm but improvements needed</p>
<p>February 2014 <u>Namoi Waste</u> Storage of Santos drilling mud onsite.</p>	<p>6 May 2014 The EPA issued Namoi Waste Corp with a Penalty Notice for breach of s145 of the POEO Act. Note - The Penalty Notice issued was not related to the original complaint regarding waste from coal seam gas, rather other waste material identified during the course of the investigation. Media release: EPA issues Naracor and Namoi Wastecorp with penalty notices for unlawful waste transport and storage</p>
<p>March 2013 <u>Bibbiewindi Water Treatment Facility</u> Pond liner failure.</p>	<p>11 Feb 2014 The EPA issued a Penalty Notice for s120 Pollution of Waters. A Pollution Reduction Program (PRP) was added to EPL 20350 (Environment Protection Licence) requiring the development of a Remediation and Monitoring Plan and the implementation of this plan.</p>
<p>March 2013 <u>Tintfield Ponds</u> Detection of elevated levels salinity and metals.</p>	<p>Insufficient evidence to determine if the changes detected in groundwater were the result of leaks from the Tintfield ponds or were from natural factors. A PRP was added to EPL 20350. Media release: No environmental harm but improvements needed</p>

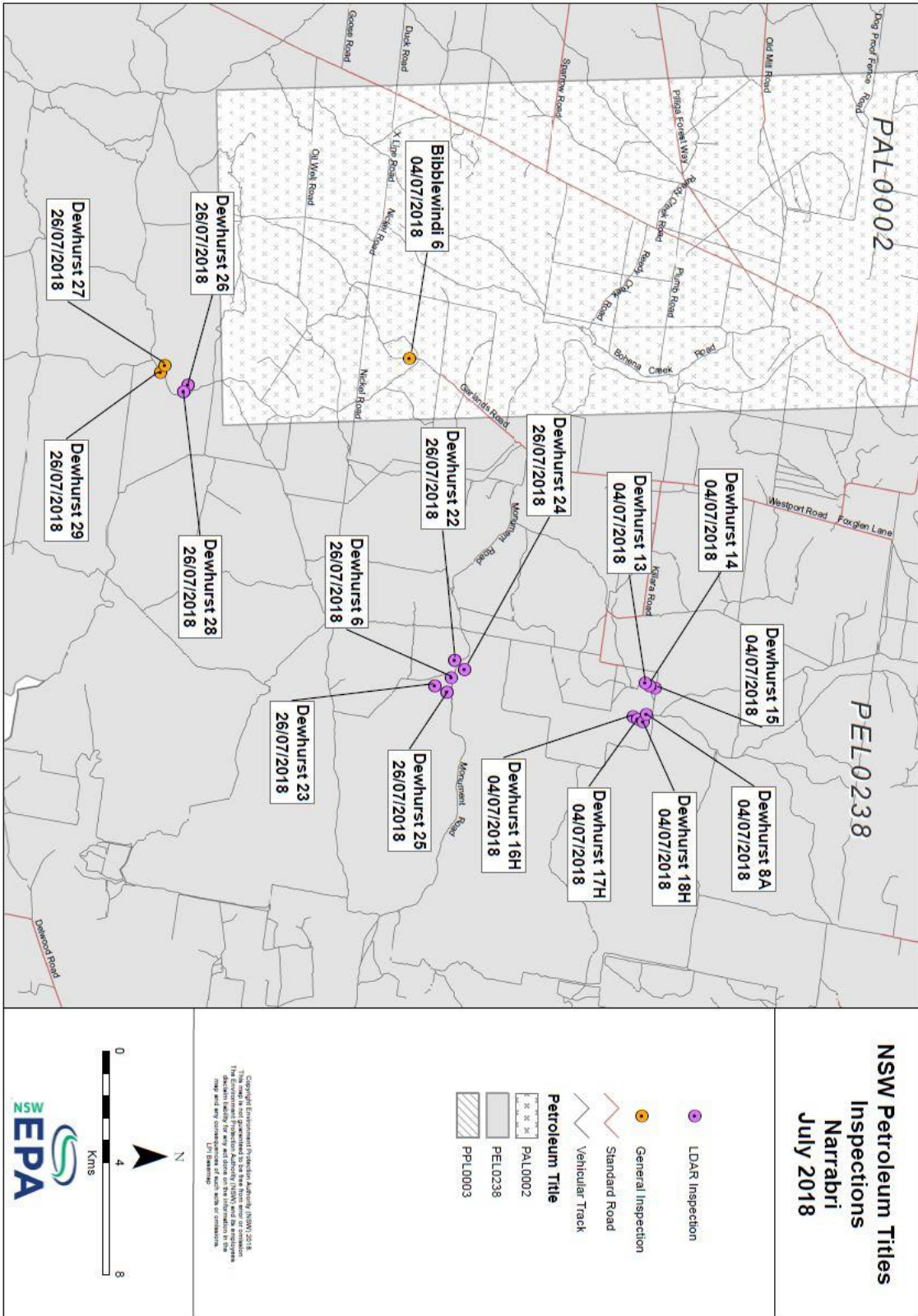
Inspections undertaken by the EPA – July 2018

Site ID	Date Inspected	Reason	Action / Outcome	Status	Relevant statutory document
Biblewindi 6	4/07/2018	General Inspection	No Issues Identified	Converted to monitoring well	PAL 2
Dewhurst 8A	4/07/2018	Leak Detection And Repair (LDAR)	No Issues Identified	Converted to monitoring well	EPL 20350
Dewhurst 13	4/07/2018	LDAR	No Issues Identified	Suspended	EPL 20350
Dewhurst 14	4/07/2018	LDAR	No Issues Identified	Suspended	EPL 20350
Dewhurst 15	4/07/2018	LDAR	No Issues Identified	Suspended	EPL 20350
Dewhurst 16H	4/07/2018	LDAR	No Issues Identified	Suspended	EPL 20350
Dewhurst 17H	4/07/2018	LDAR	No Issues Identified	Suspended	EPL 20350
Dewhurst 18H	4/07/2018	LDAR	No Issues Identified	Suspended	EPL 20350
Dewhurst 6	26/07/2018	LDAR	No Issues Identified	Shut-in	EPL 20350
Dewhurst 22	26/07/2018	LDAR	No Issues Identified	Shut-in	EPL 20350
Dewhurst 23	26/07/2018	LDAR	No Issues Identified	Shut-in	EPL 20350
Dewhurst 24	26/07/2018	LDAR	No Issues Identified	Shut-in	EPL 20350
Dewhurst 25	26/07/2018	LDAR	No Issues Identified	Shut-in	EPL 20350
Dewhurst 26	26/07/2018	LDAR	No Issues Identified	Active	EPL 20350
Dewhurst 27	26/07/2018	General Inspection	Ongoing	Active	PEL 238
Dewhurst 28	26/07/2018	LDAR	No Issues Identified	Active	EPL 20350

Dewhurst 29	26/07/2018	General Inspection	Ongoing	Active	PEL 238
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SITE INSPECTION MAP

EPA site inspections undertaken at Narrabri - July 2018



Inspections undertaken by the EPA – August 2018

Site ID	Date Inspected	Reason	Action / Outcome	Status	Relevant statutory document
Nil	Nil	Nil	Nil	Nil	Nil

CONTACT US

Want to know more about what the EPA does? Want to understand a process used by the gas industry in a bit more detail?

Tell us what you would like discussed in a Feature Article!

The EPA is happy to include a feature article in the monthly newsletters as it's a good opportunity to provide additional information and address any questions you have. Your feedback is key to ensuring we provide the sort of information the community would like to see, and so, we would like to hear from you all.

Previous editions of this newsletter have included articles on 'who we are and what we do', groundwater quality monitoring, specific EPA projects and decommissioning and rehabilitation of gas well sites. These examples may give you an idea of a question you would like to ask.

We work hard to find the most helpful way to communicate with stakeholders and we will continue to ask for your feedback regarding our communication methods, messages and styles. We want to know what works for you, so please have your say. Please send any activities, processes, questions or information you would like to see in a feature article to gas.reg@epa.nsw.gov.au

We look forward to hearing from you!

Every effort has been made to ensure that the information in this document is accurate at the time of publication. However, as appropriate, readers should obtain independent advice before making any decision based on this information.

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