

## Questions from People for the Plains representative Narrabri Gas Project CCC Meeting – September 2018

### Questions directed to EPA, DPE and DPC

The following responses are provided below to questions tabled by Tony Pickard, People for the Plains representative at the last CCC meeting.

### Questions directed to EPA

#### **Question 1. Has the Code been up dated as the version on the Departments web page is dated September 2012?**

Response provided by Resource Regulator

Answer:

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 2. In the light of the GISERA Report “Decommissioning coal seam gas wells. S.9.” will the EPA be recommending changes to the existing Decommissioning code for gas wells, if not why not?**

Response provided by Resource Regulator

Answer:

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 6 policy options presented in GISERA’s ‘Decommissioning coal seam gas wells - Final Report of GISERA Project S.9: Decommissioning CSG wells’ do not relate to the actual content of the Code of Practice for Coal Seam Gas Well Integrity document itself.

This document is a technical document that exists to provide industry with guidance and the requirements to achieve compliance in their operations.

The DRG website has information relating to CSG that already addresses some of the policy options put forward in the GISERA report.

More information on CSG is available at:

<https://www.resourcesandgeoscience.nsw.gov.au/landholders-and-community/coal-seam-gas>

**Question 3.**

**Has the EPA read this report and does the EPA intend to recommend that changes be made to all aspects of Water Monitoring and that includes both ground and surface waters as suggested in the GISERA Report? (Report is CSG-induced groundwater impacts in the Pilliga region...)**

Response to be provided directly by the EPA.

**Question 4a,b**

**Has Santos provided to the EPA a complete soil report on the Irrigation area at Leewood for the year 2017 to 2018, including the pre irrigation soil report? When and where will this report be made available to the public?**

Responses to be provided directly by the EPA.

**Questions directed to DPE**

**Question 1a. Will DP&E release a transcript of the meeting with Santos?**

No

**Q.1b. When will the all the received Agency advice from all levels of Government be released and put up on the Narrabri Gas Project Major projects planning webpage?**

The agency advice is publicly available on the Department's major project website.

**Q.1c. Does DP&E plan to put up on the dedicated Narrabri Gas Project page, the Responses from the public to Santos' RTS, if it does then when, if the DPE is not going to put the publics responses up then what are the Departments reasons?**

Yes, subject to privacy issues, additional responses and information received during the assessment of the project would be made publicly available and provided to the Independent Planning Commission, who is the consent authority for the project. Additional information will be made publicly available when the Department's assessment report is referred to the Commission.

**Q.2a. Will the DP&E take into account and ask the relevant NSW and Federal Departments/Agencies to comment on the Reports, the recommendations and suggestions as contained the two recent (release date August 2018) GISERA Reports "*Decommissioning coal seam gas wells - S.9.*" And "*CSG-induced groundwater impacts in the Pilliga region: prediction uncertainty, data-worth and optimal monitoring strategies - W8*" prior to moving to the next phase of the EIS Approval process?**

The Department will consider relevant information available for the assessment of the project. Projects undertaken by GISERA which provide technical information relevant to the Narrabri Gas Project would be considered in the assessment of the project.

The Department's Water Expert Panel and NSW Government agency personnel have attended briefings on GISERA projects, including the recommended groundwater monitoring strategy identified in the GISERA report. This report provides a useful input into groundwater monitoring requirements for the project.

**Q.3.a. Has the Department of Planning and Environment done a complete audit of all Applications and Modifications to the Department of Planning and Environment and/or its predecessor's**

**material provided, and statements made in the mentioned Application material concerning Operational, Rehabilitation, Management and Monitoring Plans that Santos and the previous PEL 238 Operators had used to obtain Departmental Approval for any site in PEL 238? (Please give a summary answer rather than a one word one)**

The Resources Regulator has undertaken the following audits.

- March 2014: Audit of compliance against the licence conditions for PEL238 and PAL2, including the exploration activity approvals for the Dewhurst North and Dewhurst South drilling programs in PEL238. This audit also assessed compliance with the requirements of the Section 77 directions that were issued to Santos and/or its predecessor in relation to the spill from the Bibblewindi treatment facility.
- September 2015: Audit of compliance with the exploration activity approval dated March 2013 and the commitments made in the Leewood – Produced Water and Brine Management Ponds: Review of Environmental Factors dated 18 December 2012.
- August 2018: Audit of compliance with the requirements of the beneficial use of gas provisions in the Petroleum Onshore Act and Regulations.

The EPA hasn't undertaken any audits of this project as lead regulator. However, the EPA has been involved in the scoping of DPE independent environmental audits and undertake the compliance and enforcement if any potential non-compliances are identified.

While not specifically relating to audits, the EPA has conducted over 200 site inspections of the Narrabri gas project in the time since becoming the lead regulator.

DPE (Planning) currently regulates the Dewhurst State Significant Development (SSD) project site. As a requirement of the development consent, an independent audit was completed in December 2015 and the audit report is available on Santos website. The 2018 independent audit is currently being prepared by Santos.

**Q.3.b. If any of the above written statements and commitments in any of the Application Documents and mentioned documentation put to the Department of Planning and Environment and/or its professor's, as above, have been found not to have been carried out as Santos committed to in any of the Applications, Modifications and associated documentation including Conditions of Approval; Will the Department of Planning and Environment stop the progress of the Narrabri Gas Project EIS until such time as they are either carried out, or, Santos provides Applications to rescind the statements/commitments and the proper process followed, or, will the Department allow the continuation of the EIS, but advise the IPC of its findings and advise that the approval of the Narrabri Gas Project be totally dependent upon Santos or any holder of the Lease PEL 238 carrying out to the Department of Planning and Environment and any other Department/Regulator complete satisfaction of that work or study as mentioned in any of the previously mentioned Application, Modification and associated documentation including Conditions of Approval?**

No – the assessment of the Narrabri Gas Project is a separate process to regulatory action undertaken under current or prior approvals held by Santos or prior operators.

**Q.3.c. Will these findings, if any, be made public in real time after the investigation has been completed? Where will these findings be located? If in the course of the investigation so called Confidential Documents are found will the Department do a brief summary of these documents so that the public may best understand the reasons behind any Departmental findings and actions?**

Independent audit reports required under the development consent are publicly available on Santos website.

The EPA as the lead regulator provides a summary of its compliance action including investigations in its Narrabri CCC Monthly Update. These summary documents are publicly available.

**Questions directed to DPC**

To be provided prior to the next CCC meeting.

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