

Narrabri CCC Monthly Update

JUNE 2016

The following is a monthly update for the Narrabri CCC regarding activities undertaken by the NSW Environment Protection Authority (EPA) relating to PEL 238 (Narrabri Gas Project).

It includes both activities undertaken relating to Environment Protection Licence (EPL) 20350 and the EPA functions conducted under the NSW Gas Plan.

Attachments to this month's update:

- Running Log – Old Investigations PEL 238 Outcomes
- Gas Regulation Officers' May 2016 Inspection Log
- Feature Article - Dust Monitoring within an Environment Protection Licence
- EPA Site Inspection Map – May 2016

EPA ACTION ITEMS SINCE LAST NCCC

Nil

INVESTIGATIONS

Background

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

On 1 July 2015 the EPA commenced its 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 will work 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.

Current Incidents

Nil since CCC Narrabri meeting held in May 2016

Running Log – Old Investigations PEL 238 Outcomes

Incident	Outcome
<p>March 2013 <u>Biblewindi 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 these.</p>
<p>March 2013 <u>Tintsville 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 Tintsville ponds or were from natural factors. A PRP was added to EPL 20350. 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 Naracorp and Namoi Wastecorp with penalty notices for unlawful waste transport and storage</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>September 2015 <u>Bohena Creek</u> Piezometer located in creek</p>	<p>No regulatory action required.</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 and that no regulatory action was required.</p>
<p>January 2016 <u>Santos Piliga</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>February 2016 <u>Santos Piliga</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>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 must be performed manually by a field operator. Santos is currently amending its manual venting procedure to ensure a field operator is present at all times.</p>
<p>March 2016 <u>Santos Piliga</u> Report received that there was a “foamy residue” left along Beehive Road. A reporter 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>EPA Officer spoke to reporter 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 seen spraying produced water between the internal fence and the property boundary fence for dust mitigation</p>	<p>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>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 their activities as per media Tweet by the EPA.</p>

EPA ACTIVITIES

Inspections undertaken by the EPA

Inspections					
Site ID	Date Inspected	Reasons	Action/Outcome	Status	Statutory Document
Biblewindi legacy salinity site	4/5/2016	General Inspection	Site rehabilitation progress is being monitored	Rehabilitating	PAL0002 & Section 77 Notice from DRE
Biblewindi legacy salinity site	6/5/2016	General Inspection	Site rehabilitation progress is being monitored	Rehabilitating	PAL0002 & Section 77 Notice from DRE
Wilga Park Power Station	6/5/2016	General Inspection	N/A	N/A	PEL0238 & Project Approval S07/00277
New Monitoring	6/5/2016	General Inspection	N/A	N/A	PEL0238

Inspections					
Bore Wilga Park					
Tintsville 5	6/5/2016	General Inspection	N/A	N/A	PEL0238
Leewood Water Treatment Facility	10 May 2016	General site inspection to view RO plant construction and progress with Leewood Cell 4 inspection works.	EPA will continue to liaise with Santos regarding Cell 4 until it is brought back online.	N/A	PEL238
Biblewindi legacy salinity site	11/5/2016	General Inspection	Site rehabilitation progress is being monitored	Rehabilitating	PAL0002 & Section 77 Notice from DRE
Bohena South 1	11/5/2016	General Inspection	Site rehabilitation progress is being monitored	Monitoring	PAL0002
Biblewindi legacy salinity site	20/5/2016	General Inspection	Site rehabilitation progress is being monitored	Rehabilitating	PAL0002 & Section 77 Notice from DRE
Biblewindi legacy salinity site	26/5/2016	General Inspection	Site rehabilitation progress is being monitored	Rehabilitating	PAL0002 & Section 77 Notice from DRE

Inspections for LDAR (Leak Detection & Repair)

Site ID	Date Inspected	Reason	Action/Outcome
Biblewindi 25	5 May 2016	Leak detecting monitoring	No reportable leaks identified

Dust Monitoring within an Environment Protection Licence

The EPA requires licensees to prevent and minimise dust generated from licensed premises and may include specific conditions relating to management of dust on an individual Environment Protection License (EPL).

The Narrabri CSG project (EPL 20350) incorporates the following three specific operating conditions relating to dust:

1. All areas in or on the premises must be maintained in a condition that prevents or minimises the emission into the air of dust.
2. Any activity in or on the premises must be carried out by such practicable means as to prevent or minimise the emission into the air of dust.

Any plant in or on the premises must be operated by such practicable means as to prevent or minimise the emission of dust into the air.

Any impacts on air quality, including particulate emissions, are reviewed by the EPA during a project's planning phase. The level of assessment depends on the scale and nature of the proposed activities, as well as consideration of other factors such as location of nearby sensitive receptors.

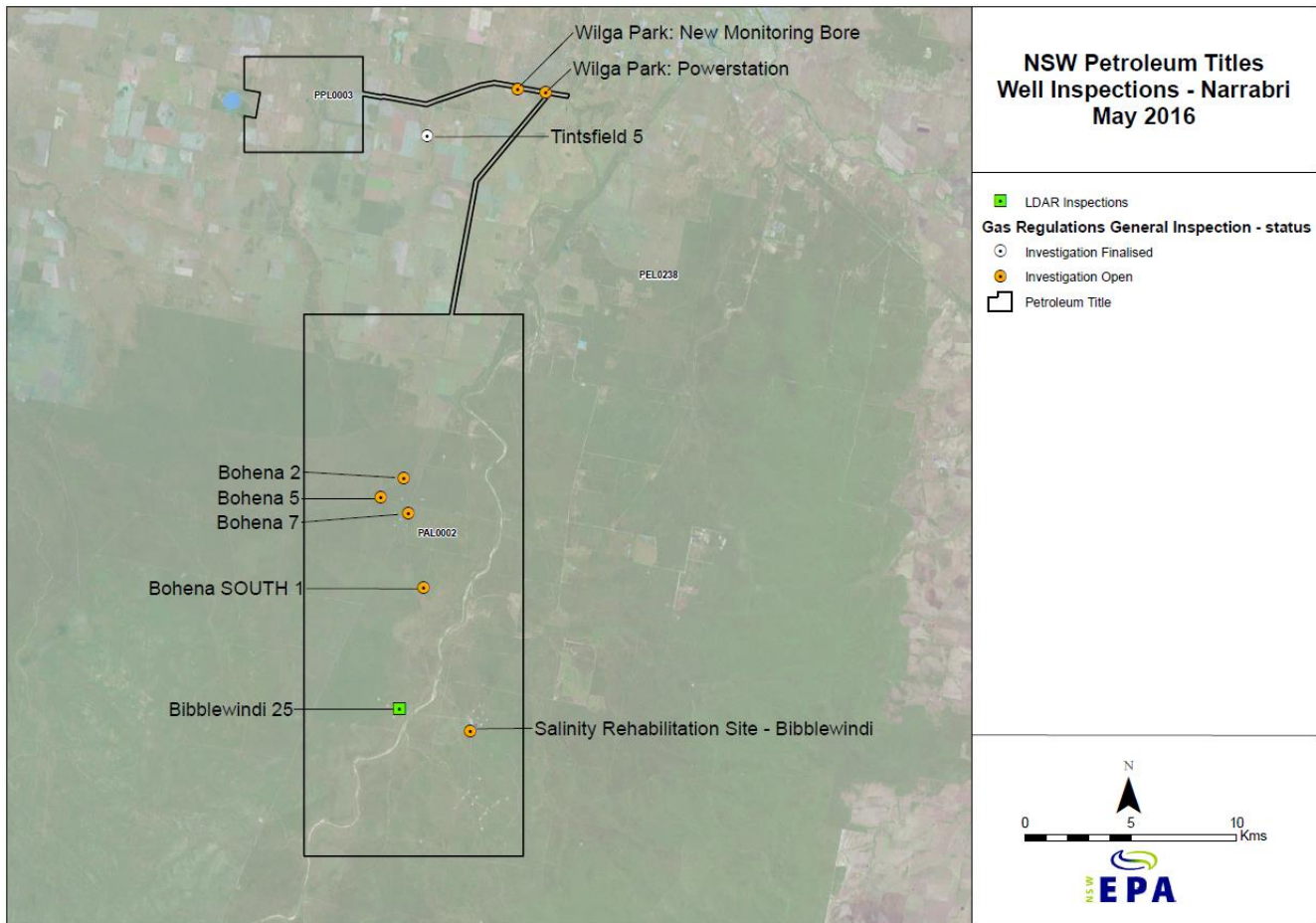
During this assessment, the licensee is also required to prepare and implement various plans including a soil and water management plan that addresses the management of sediments at the premises. These plans must be developed in accordance with broad-based guidelines such as *Managing Urban Stormwater: Soils and Construction (Landcom, 2004)*.

At this time, based on the current scale of activities, there are no specific particulate emissions monitoring being undertaken at the Narrabri CSG project (EPL 20350).

Should the EPA form the opinion that the licensee is not properly managing particulate emissions, the licensee may be required to implement a particulate monitoring network or appropriate dust mitigation strategies.

SITE INSPECTION MAP

EPA site inspections undertaken at Narrabri during May 2016



*LDAR = Leak Detection and Repair

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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