

From: [REDACTED]
Sent: Mon, 23 Jan 2023 03:18:49 +0000
To: [REDACTED]
Subject: FW: Weekly Report #1
Attachments: Enforcement 1898 - Direction - General Direction - Barossa GEP Installation.obr, Santos to NOPSEMA Report WEEK 1 200123.docx, 230113 - Ltr EDO to Allens.pdf

OFFICIAL

Hi [REDACTED]

The email below relates to the first of the weekly reports to be submitted by Santos as required by Direction 1898 (attached). When they are received, can you please record them in the attached enforcement folder and forward them to [REDACTED].

In addition, I could I also please ask you to keep a close eye on the submissions inbox for a Reg 29 notification from Santos for this activity? The requirement to submit a notification this is included in the Direction. When it is received, can you advise the people above and process as a matter of high importance.

regards

[REDACTED]
Operations Team

Environment, Renewables and Decommissioning Division



NOPSEMA

Australia's offshore
energy regulator

National Offshore Petroleum Safety and Environmental Management Authority

T: [REDACTED] | **M:** [REDACTED] | **E:** [REDACTED] | **W:** nopsema.gov.au

To assure the protection of lives and the environment offshore.

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Acknowledgement of Country

NOPSEMA recognises the First Peoples of this nation and their ongoing connection to culture and country. We acknowledge First Nations Peoples as the Traditional Owners, Custodians and Lore Keepers of the world's oldest living culture and pay respects to their Elders past, present and emerging.

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From: [REDACTED]
Sent: Monday, 23 January 2023 10:01 AM
To: [REDACTED]
Cc: [REDACTED]; Regulatory Submissions (Shared Mailbox)
<submissions@nopsema.gov.au>
Subject: RE: Weekly Report #1

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Thanks [REDACTED] noted and I will do that in future.

Regards [REDACTED]

From: [REDACTED]
Sent: Monday, 23 January 2023 12:27 PM
To: [REDACTED]
Cc: [REDACTED]; Regulatory Submissions (Shared Mailbox)
<submissions@nopsema.gov.au>
Subject: ![EXT]: Re: Weekly Report #1

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Good morning [REDACTED]

Thanks for your email.

NOPSEMA acknowledges the submission of your report.

For future submissions please submit reports directly to the NOPSEMA submissions inbox (copied).

Regards,

[REDACTED]
Environment, Renewables & Decommissioning

National Offshore Petroleum Safety and Environmental Management Authority

T: [REDACTED] | M: [REDACTED] | E: [REDACTED] | W:
nopsema.gov.au

To assure the protection of lives and the environment offshore.

From: [REDACTED]
Sent: Friday, January 20, 2023 3:19:24 PM
To: [REDACTED]

Subject: Weekly Report #1

Dera [REDACTED]

Please find attached Weekly Report #1 in accordance with the Direction, together with the document referenced in the Report.

Kind Regards,

Santos

[REDACTED]
Santos Limited
60 Flinders Street, Adelaide SA 5000
t: [REDACTED] m: [REDACTED]

   [santos.com](https://www.santos.com)

Santos Ltd A.B.N. 80 007 550 923

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20 January 2023

CONFIDENTIAL

[REDACTED]
NOPSEMA
Level 8, 58 Mounts Bay Road
Perth WA 6000

Dear [REDACTED]

We refer to NOPSEMA's General Direction dated 13 January 2023 (**Direction**) issued under section 574 of the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (Cth) in relation to the Barossa Gas Export Pipeline Installation Environment Plan (**EP**). The Direction was issued to Santos NA Barossa Pty Ltd, SK E&S Australia Pty Ltd and Santos Offshore Pty Ltd as the registered holders of Pipeline Licence NT/PL5.

Santos acknowledges that the General Direction will be made public at 1630 hours (Australian Eastern Time) on Monday 23 January 2023.

Pursuant to Direction 4, 'the registered holders must submit progress reports to NOPSEMA detailing progress in undertaking the actions required by Directions 2 and 3 every 7 days from the date of this Direction, until those Directions have been met'.

We also note NOPSEMA's reference to the MOC process within the Explanatory Statement and also provides an update in respect of that specifically.

The report is contained in the annexure to this letter.

Should you require any further information, please let us know.

Yours sincerely

[REDACTED]
Santos Limited
Santos NA Barossa Pty Ltd, as Operator for and on behalf of the Barossa Joint Venture Parties

CC JERA Barossa Pty Ltd
SK E&S Australia Pty Ltd

Annexure

No.	Action Required	Status	Anticipated Completion Date
Direction 1			
<i>The registered holders must notify NOPSEMA of any future activities covered by the Barossa Gas Export Pipeline Installation Environment Plan (EP) that are to commence at least 10 days before the activity commences.</i>			
1.	Notify NOPSEMA of any future activities covered by the EP that are to commence at least 10 days before the activity commences.	No activities covered by the EP will commence within the next 10 days. We note certain vessel, helicopter and personnel pre-mobilisation activities are continuing.	N/A
Direction 2			
<i>The registered holders must undertake and complete an assessment to identify any underwater cultural heritage places along the Barossa pipeline route (Pipeline Route) to which people, in accordance with Indigenous tradition, may have spiritual and cultural connections that may be affected by the future activities covered by the EP (the assessment), as follows:</i>			
<ul style="list-style-type: none"> a) <i>The assessment is to be undertaken by suitably qualified and independent experts with relevant experience and research credentials (experts).</i> b) <i>In undertaking the assessment, the experts must:</i> <ul style="list-style-type: none"> i. <i>obtain information from people and/or organisations who have, in accordance with Indigenous tradition, spiritual and cultural connections to any underwater cultural heritage places along the Pipeline route that may be affected by the activities; and</i> ii. <i>record and have regard to the information obtained.</i> c) <i>The assessment must be recorded in a report that is to be provided on completion to:</i> <ul style="list-style-type: none"> i. <i>people and/or organisations who provided information under paragraph (b)(i) above; and</i> ii. <i>NOPSEMA.</i> 			

No.	Action Required	Status	Anticipated Completion Date
2.	Undertake an assessment to identify any underwater cultural heritage places along the Pipeline Route. The assessment must be undertaken by suitably qualified and independent experts with relevant experience and research credentials.	<p>Santos has selected independent experts in the fields of marine archaeology and anthropology. The scopes of work, terms of engagement and contracts are in progress.</p> <p>Significant amounts of pipeline route geophysical data have been transferred to the experts for the assessment along with evidence of stories and songlines provided during the Tipakalippa case.</p> <p>Santos anticipates that all relevant experts will be fully briefed in coming days.</p>	Week commencing 23 January 2022
3.	<p>The experts must:</p> <ul style="list-style-type: none"> i. obtain information from people and/or organisations who have, in accordance with Indigenous tradition, spiritual and cultural connections to any underwater cultural heritage places along the Pipeline Route that may be affected by the activities; and ii. record and have regard to the information obtained. 	<p>The anthropologist (referred to above) will have a scope of work which includes a brief to obtain information, and have regard to information provided to Santos, from traditional owners and organisations in relation to underwater cultural heritage places along the Pipeline Route.</p> <p>Santos is publicly advertising from tomorrow via a number of channels, requesting people with spiritual and cultural connections to underwater cultural heritage places to come forward and provide information.</p>	TBC

No.	Action Required	Status	Anticipated Completion Date
		<div style="background-color: black; width: 100%; height: 100%;"></div> <p>Santos will continue to seek a meeting with EDO's clients. Santos notes that the EDO's clients appear not to hold knowledge of any underwater heritage places.</p> <p>Further, Santos will be visiting the Tiwi Islands between 6-10 February for meetings with Tiwi clans. These meetings have been publicly advertised via a number of channels. As part of our meeting agenda our relevant experts will be outlining the studies proposed and seeking input from people and/or organisations who have, in accordance with Indigenous tradition, spiritual and cultural connections to any underwater cultural heritage places along the Pipeline route that may be affected by the activities.</p> <p>The direction to conduct an underwater cultural heritage assessment will be explained and attempts will be made to obtain information from people and organisations with spiritual and cultural connections to underwater</p>	

No.	Action Required	Status	Anticipated Completion Date
		<p>cultural heritage places along the pipeline route.</p> <p>Santos is writing in the next few days to the Tiwi Islands Land Council, Northern Land Council, Tiwi Resources and the Tiwi Islands Regional Council to request their assistance in obtaining information from people and organisations with spiritual and cultural connections to underwater cultural heritage places along the pipeline route.</p>	
4.	<p>Provide a report containing the assessment to:</p> <ul style="list-style-type: none"> i. people and/or organisations who provided information under Direction 2, paragraph (b)(i); and ii. NOPSEMA. 	Nothing to report at present.	N/A
<p style="text-align: center;">Direction 3</p> <p><i>Following the completion of the assessment required by Direction 2, if any underwater cultural heritage places along the Pipeline Route to which people, in accordance with Indigenous tradition, may have spiritual and cultural connections are identified that may be affected by future activities covered by the EP, the registered holders must update the EP. This must include relevant content as required under regulation 13 and regulation 14 of the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 (Environment Regulations), including details and evaluation of impacts and risks (the evaluation) of future activities, including:</i></p> <ul style="list-style-type: none"> a) <i>the methods and results of the evaluation on any identified underwater cultural heritage places along the Pipeline Route to which people, in accordance with Indigenous tradition, may have spiritual and cultural connections identified in undertaking Direction 2;</i> b) <i>details of the control measures (if any) adopted to demonstrate that the environmental impacts and risks of the activity will be reduced to as low as reasonably practicable (ALARP) and be of acceptable levels;</i> c) <i>a description of any other legislative requirements that apply to the activity and a demonstration of how those will be met; and</i> d) <i>how any information obtained from people and / or organisations who provided information under paragraph 2(b)(i) above, has been taken into account in the evaluation, and in determining control measures.</i> 			
5.	Assuming that any underwater cultural heritage places along the Pipeline Route are identified that may be affected by future activities covered by the EP, update the EP to include an updated environmental assessment pursuant to regulations 13 and 14 of the Environment Regulations.	Nothing to report at present.	N/A

Explanatory Statement

- At time of writing, Santos had not received a copy of the draft NOPSEMA inspection report for the inspection conducted on 21 and 22 December 2022.
- Santos commenced its Management of Change (MoC) - #268 - relating to the assessment of underwater cultural heritage places on 3 January 2022 (activities included in report above).

Other Related Matters

- The Santos GEP Safety Case was accepted by NOPSEMA on 17 January 2023.
- Santos notes that the EDO legal team and Environment Centre NT (ECNT) will be attending organised community information sessions on the Tiwi Islands between 31 January and 2 February 2023. All Tiwi residents are invited to attend these community information sessions about Santos Barossa Gas Project Consultation. The sessions are proposed to ensure that “everyone has access to ALL the information before Santos come to community to do their consultations”. Consultation guidelines will be provided at the sessions. [REDACTED] is the primary contact for more information. Santos has not been approached by EDO, ECNT or [REDACTED] about the information sessions.