

Santos Ltd  
ABN 80 007 550 923  
Santos Centre  
60 Flinders Street  
Adelaide South Australia 5000  
GPO Box 2455  
Adelaide South Australia 5001  
Telephone: +61 8 8116 5000  
www.santos.com

01 February 2023

## CONFIDENTIAL

[REDACTED]  
[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**). For clarity, any references in this letter to the EP are to revision 3 which was accepted by NOPSEMA on 9 March 2020.

We also refer to Santos':

- + weekly update dated 27 January 2023, submitted to NOPSEMA in accordance with Direction 4; and
- + letter dated 22 December 2022 containing an undertaking to NOPSEMA.

### Engagement of Archaeologist and Proposed Surveys

As identified in the weekly update, Santos continues to progress the expert engagements necessary to support the assessment required by Direction 2. Santos confirms that it has engaged Wessex Archaeology Ltd (**Wessex**), together with its subcontractor Extent Heritage, as suitably qualified and experienced, independent experts to undertake an archaeological scientific assessment of geophysical and geotechnical data relating to potential heritage along the pipeline route.

In order to support the assessment required by Direction 2, further data acquisition is proposed, including a sub-bottom profiling (**SBP**) survey and subsequent ROV survey proposed to be undertaken along, and at either end, of the pipeline route (**Proposed Surveys**). The Proposed Surveys would supplement a desktop archaeological assessment of existing data as it relates to the pipeline route.

The Proposed Surveys:

- a. will be limited to an archaeological scientific assessment that aims to identify submerged buried landforms and areas of sea floor that may have the potential to retain Aboriginal cultural heritage;
- b. will be carried out along and at either end of the pipeline route (within the Operational Area); and
- c. will be carried out over cross-sections of the pipeline route up to the width of the Operational Area (around 4 km tie lines).

The results of the archaeological assessment (including after the completion of the Proposed Surveys) will be recorded in a final report that will identify the characteristics and features of the submerged landscape.

We confirm that survey contractors engaged by Santos would undertake the Proposed Surveys within the Operational Area, in accordance with the EP.

As NOPSEMA may be aware, the EP authorises site surveys as part of the petroleum activities. In particular, SBP and ROV surveys are permitted by the EP as follows:

- + Table 3-1 of the EP identifies 'pre-lay surveys' as a 'key activity';
- + Table 3-4 of the EP describes the 'Potential Activities' to be undertaken by 'marine survey vessels', including pre-lay surveys of the pipeline route using SBP; and
- + Section 3.5.1 of the EP provides that 'site surveys' will be undertaken at 'various stages throughout the GEP installation campaign', which include the use of SBPs using acoustic pulses '*transmitted from a towed surface or deep-sea source and collected by a receival array that it towed below the water surface.*' Survey methods also include ROV mounted equipment including that required for visual inspection.

Based on its review to date, Santos does not consider that the Proposed Surveys will involve any significant modification or new stage of the activity, nor will it involve any new significant impact or risk that is not otherwise provided for in the EP. However, Santos is undertaking a Management of Change (**MOC**) process to confirm the above, and will finalise this process before it commences the Proposed Surveys. This letter is to notify you at least 10 days prior to the commencement of the Proposed Surveys pursuant to Direction 1, noting that if the MOC results in a requirement to revise and resubmit the EP, Santos will not proceed with the Proposed Surveys and will notify NOPSEMA accordingly.

Santos has identified a vessel and survey crew with availability to undertake the Proposed Surveys from approximately 20 February 2023. Time is therefore of the essence. To maintain the possibility of proceeding with the Proposed Surveys in the window available, Santos is making regulatory notifications in advance of a final decision to undertake the Proposed Surveys.

Santos is providing this update to NOPSEMA so it has an opportunity to raise any concerns or queries in relation to the Proposed Surveys. We will keep you fully updated of the outcome of our MOC process and final decision on the Proposed Surveys.

## Undertaking

On 22 December 2022, Santos sent a letter to NOPSEMA containing an undertaking '*not to commence pipeline construction until the MOC has been completed, and NOPSEMA has inspected, notwithstanding any delay to Santos' scheduled commencement of activities under the Pipeline EP.*

For clarity, Santos does not consider that the Proposed Surveys will constitute 'pipeline construction' and therefore the undertaking is not applicable to them.

In the event that NOPSEMA has any queries or concerns, or would like further information, we would be grateful if you could let Santos know at the earliest opportunity.

Yours sincerely



**Santos Ltd, as Operator for and on behalf of the Barossa Joint Venture Parties**

**CC to JERA & SK**

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