

From: [REDACTED]
Sent: Fri, 10 Mar 2023 06:49:08 +0000
To: Regulatory Submissions (Shared Mailbox)
Cc: [REDACTED]
[REDACTED]; barossa regulatory
Subject: Confidential: Santos General Direction 1898 Report #8
Attachments: Santos to NOPSEMA General Direction 1898 Progress Report WEEK 8_FINAL.pdf
Categories: [REDACTED]

CONFIDENTIAL

Dear [REDACTED] and [REDACTED],

On behalf of Santos and Barossa Joint Venture Parties, please find attached Progress Report #8 on General Direction 1898.

Kind regards

[REDACTED]

Santos

m: [REDACTED]

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

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10 March 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**). 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.

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

To date, Santos has submitted progress reports dated 20 and 27 January; 03, 10, 17 and 24 February; and 04 March 2023 pursuant to Direction 4.

The latest report is annexed to this letter.

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

Yours sincerely

[REDACTED]
On behalf of 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.	As an update to Report #7 and as explained in the stakeholder weekly update distributed in accordance with the GEP EP on 7 March 2023 (Appendix 1), inclement weather has delayed the marine survey. The anticipated survey commencement date is 10 or 11 March 2023.	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> 			
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>Wessex Archaeology Ltd (Wessex) continues their assessment. The current target date for a draft report is 27 April 2023. The target date is dependent on timely completion of the marine survey.</p> <p>Santos has engaged an anthropologist, Dr Brendan Corrigan, as an independent expert to undertake a cultural heritage assessment under the direction. A copy of Dr Corrigan's CV is included at Appendix 2.</p>	TBC
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 	<p>Santos has planned a series of Tiwi Islands visits over coming weeks to continue obtaining information and oral histories relating to spiritual and cultural connections to underwater cultural heritage places.</p> <p>Santos and Dr Corrigan are visiting the Tiwi Islands from 9 to 12 March 2023 to progress obtaining oral histories and exploring any cultural</p>	TBC

No.	Action Required	Status	Anticipated Completion Date
	<p>Pipeline Route that may be affected by the activities; and</p> <p>ii. record and have regard to the information obtained.</p>	<p>and spiritual connections and the presence of any underwater cultural heritage places for the purposes of a cultural heritage assessment.</p> <p>Dr Corrigan has also contacted and obtained materials from the Tiwi Land Council and Northern Land Council.</p> <p>Following requests from the communities during Santos's February Tiwi Islands visit, a boat trip has been organised through Tiwi Resources for the purposes of a site visit to the proposed gas export pipeline location, involving clan Elders and Dr Corrigan, on 15 and 16 March 2023. Attendees were nominated by clan group trustees through Tiwi Resources.</p>	
4.	<p>Provide a report containing the assessment to:</p> <p>i. people and/or organisations who provided information under Direction 2, paragraph (b)(i); and</p> <p>ii. NOPSEMA.</p>	Nothing to report at present.	N/A
<p>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> <p>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></p> <p>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></p> <p>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></p> <p>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></p>			
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	Nothing to report at present.	N/A

No.	Action Required	Status	Anticipated Completion Date
	regulations 13 and 14 of the Environment Regulations.		

Explanatory Statement

- Santos commenced its Management of Change (MoC) relating to the assessment of underwater cultural heritage places on 3 January 2022 (activities included in this and previous progress reports).

Other Related Matters

- Santos wrote to NOPSMEA on 15 February 2023 regarding pipeline installation activities outside of the Expected Period documented in the Barossa Gas Export Pipeline Installation Environment Plan (Revision 3) without contravening Regulation 7(1), Regulation 17(5), or Regulation 17(6). NOPSEMA responded to the letter on 22 February 2023. Santos is currently considering the letter.
- Santos received letters from the EDO on 10 February 2023 and 1 March 2023 relating to the Barossa Gas Export Pipeline Installation. The letters were copied to NOPSEMA. Santos responded to the EDO on 9 March 2023 (Appendix 3).
- Santos acknowledges receipt of NOPSEMA's Final GEP EP Inspection Report dated 02 March 2023. Santos will provide NOPSEMA with responses to conclusions 3589-C1 and 2589-C2 contained in the inspection report by 23 March 2023.

Annexure

Appendix 1: GEP EP survey weekly update (#4) sent 07 March 2023

From: [Consultation Santos](#)
 Subject: Barossa Marine Survey - Weekly Update #5
 Date: Tuesday, 7 March 2023 12:14:57 PM
 Attachments: [Barossa Marine Survey Notice Feb 2023.pdf](#)
[image002.png](#)

Dear stakeholder,

Santos provided the attached notice of proposed Barossa marine surveys on 1 February 2023, which included a commitment to provide weekly status updates via email.

Barossa Marine Survey - Weekly Update #5

Date issued:

Tuesday, 7 March 2023

Activity Summary:

The Barossa Gas Export Pipeline (GEP) marine surveys will be conducted in accordance with an Environment Plan (EP) accepted by the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA). Previous updates advised that a survey is scheduled to occur nominally between 22 February and 5 March 2023. Due to inclement weather the survey was unable to be undertaken during this period. The survey is now scheduled to commence tomorrow, 8 March 2023.

The survey will be carried out from a vessel (Bhagwan K) during daylight hours with survey equipment towed from the vessel's aft. There will be no construction activity involved and the seabed will not be contacted.

The survey will be conducted along a route of approximately 260 kilometres (140 nautical miles) between the below coordinates:

Route	Latitude	Longitude
Start	12° 01.4' South	129° 54.5' E
End	09° 49.2' South	130° 15.8' E

Look Back:

N/A. Vessel not yet within the survey operational area.

Look Ahead:

Subject to favourable weather conditions, the Bhagwan K is scheduled to commence the survey tomorrow, 8 March 2023.

Once the vessel enters the operational area, survey activities will commence at the southern end of the route shown in the attached notice. The vessel will travel north along the route at an average speed of ~5 knots. Survey activities will end at the northern end of the pipeline route. The vessel will also complete a number of tie-in survey lines and may need to duplicate the survey over some sections, dependent on data quality.

Vessel Details:

The Bhagwan K (below) is a Darwin-based utility vessel regularly used for offshore industry support work, including marine surveys. It is 24m in length and has a regular crew of four. A Santos representative will also be onboard for the survey duration. Other vessels are requested to maintain a safe distance from the survey vessel which will have limited manoeuvrability while undertaking the work. Contact details for the vessel are as follows:

Call Sign	VHLC
Maritime Mobile Service Identity (MMSI)	503434500
Bridge	VHF channels 10 and 16

Communications:

The Santos representative on the vessel will be contactable via its radio communication system. Anyone without this radio capability, seeking to urgently contact Santos about the survey, should call 1800 267 600 which is a manned 24-hour service.

Should you require any further information or have a comment on the survey please contact Santos on the same telephone number, 1800 267 600, or via email at Offshore.Consultation@santos.com

The next weekly update will be provided on 14 March.

Dear stakeholder,

Santos provided the attached notice of proposed Barossa marine surveys on 1 February 2023, which included a commitment to provide weekly status updates via email.

Barossa Marine Survey - Weekly Update #4

Date issued:

Tuesday, 28 February 2023

Activity Summary:

The Barossa Gas Export Pipeline (GEP) marine surveys will be conducted in accordance with an Environment Plan (EP) accepted by the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA). Previous updates advised that a survey is scheduled to occur nominally between 22 February and 5 March 2023. Due to inclement weather the survey is yet to commence.

The survey will be carried out from a vessel (Bhagwan K) during daylight hours with survey equipment towed from the vessel's aft. There will be no construction activity involved and the seabed will not be contacted.

The survey will be conducted along a route of approximately 260 kilometres (140 nautical miles) between the below coordinates:

Route	Latitude	Longitude
Start	12° 01.4' South	129° 54.5' E
End	09° 49.2' South	130° 15.8' E

Look Back:

N/A. Vessel not yet within the survey operational area.

Look Ahead:

Due to inclement weather the vessel was unable to commence activities within the survey operational area on Sunday, 26 February 2023, as previously advised in Weekly Update #3. A new indicative start date will be advised when available.

Once the vessel enters the operational area, survey activities will commence at the southern end of the route shown in the attached notice. The vessel will travel north along the route at an average speed of ~5 knots. Survey activities will end at the northern end of the pipeline route. On its return journey the vessel will then complete a number of tie-in survey lines and may need to duplicate the survey over some sections, dependent on data quality.

Vessel Details:

The Bhagwan K (below) is a Darwin-based utility vessel regularly used for offshore industry support work, including marine surveys. It is 24m in length and has a regular crew of four. A Santos representative will also be onboard for the survey duration. Other vessels are requested to maintain a safe distance from the survey vessel which will have limited manoeuvrability while undertaking the work. Contact details for the vessel are as follows:

Call Sign	VHLC
Maritime Mobile Service Identity (MMSI)	503434500
Bridge	VHF channels 10 and 16

Call Sign	VHLC
Maritime Mobile Service Identity (MMSI)	503434500
Bridge	VHF channels 10 and 16

Communications:

The Santos representative on the vessel will be contactable via its radio communication system. Anyone without this radio capability, seeking to urgently contact Santos about the survey, should call 1800 267 600 which is a manned 24-hour service.

Should you require any further information or have a comment on the survey please contact Santos on the same telephone number, 1800 267 600, or via email at Offshore.Consultation@santos.com

The next weekly update will be provided on 7 March.

From: Consultation, Santos

Sent: Wednesday, 22 February 2023 9:30 AM

Subject: Barossa Marine Survey - Weekly Update #3

Dear stakeholder,

Santos provided the attached notice of proposed Barossa marine surveys on 1 February 2023, which included a commitment to provide weekly status updates via email.

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Barossa Marine Survey - Weekly Update #3

Date issued:

Wednesday 22 February 2023

Activity Summary:

The Barossa Gas Export Pipeline (GEP) marine surveys will be conducted in accordance with an Environment Plan (EP) accepted by the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA). Previous updates advised that a survey is scheduled to occur nominally between 22 February and 5 March 2023. Due to vessel availability, the survey is now scheduled to start on 26 February 2023.

The survey will be carried out from a vessel (Bhagwan K) during daylight hours with survey equipment towed from the vessel's aft. There will be no construction activity involved and the seabed will not be contacted.

The survey will be conducted along a route of approximately 260 kilometres (140 nautical miles) between the below coordinates:

Route	Latitude	Longitude
Start	12° 01.4' South	129° 54.5' E
End	09° 49.2' South	130° 15.8' E

Look Back:

N/A. Vessel not yet within the survey operational area.

Look Ahead:

The vessel is currently expected to commence activities within the survey operational area on Sunday, 26 February 2023. Survey activities will commence at the southern end of the route shown in the attached notice.

The vessel will travel north along the route at an average speed of ~5 knots. Survey activities will end at the northern end of the pipeline route. On its return journey the vessel will then complete a number of tie-in survey lines and may need to duplicate the survey over some sections, dependent on data quality.

Vessel Details:

The Bhagwan K (below) is a Darwin-based utility vessel regularly used for offshore industry support work, including marine surveys. It is 24m in length and has a regular crew of four. A Santos representative will also be onboard for the survey duration. Other vessels are requested to maintain a safe distance from the survey vessel which will have limited manoeuvrability while undertaking the work. Contact details for the vessel are as follows:

Call Sign	VHLC
Maritime Mobile Service Identity (MMSI)	503434500
Bridge	VHF channels 10 and 16

Communications:

The Santos representative on the vessel will be contactable via its radio communication system. Anyone without this radio capability, seeking to urgently contact Santos about the survey, should call 1800 267 600 which is a manned 24-hour service.

Should you require any further information or have a comment on the survey please contact Santos on the same telephone number, 1800 267 600, or via email at Offshore.Consultation@santos.com

The next weekly update will be provided on 28 February.

From: Consultation, Santos

Sent: Tuesday, 14 February 2023 4:03 PM

Subject: Barossa Marine Survey - Weekly Update #2

Dear stakeholder,

Santos provided the attached notice of proposed Barossa marine surveys on 1 February 2023, which included a commitment to provide weekly status updates via email. Weekly Update #1, issued on 8 February, is also attached. Please see weekly update #2 below.

Barossa Marine Survey - Weekly Update #2

Date issued:

Tuesday 14 February 2023

Activity Summary:

The Barossa Gas Export Pipeline (GEP) marine surveys will be conducted in accordance with an Environment Plan (EP) accepted by the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA). A survey is scheduled to occur nominally between 22 February and 5 March 2023.

The survey will be carried out from a vessel (Bhagwan K) during daylight hours with survey equipment towed from the vessel's aft. There will be no construction activity involved and the seabed will not be contacted.

The survey will be conducted along a route of approximately 260 kilometres (140 nautical miles) between the below coordinates:

Route	Latitude	Longitude
Start	09° 49.2' South	130° 15.8' E

End	12° 01.4' South	129° 54.5' E
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Look Back:

N/A. Vessel not within the survey operational area until 22 February 2023.

Look Ahead:

N/A. Vessel not within the survey operational area until 22 February 2023.

Vessel Details:

The Bhagwan K (below) is a Darwin-based utility vessel regularly used for offshore industry support work, including marine surveys. It is 24m in length and has a regular crew of four. A Santos representative will also be onboard for the survey duration. Contact details for the vessel are as follows:

Call Sign	VHLC
Maritime Mobile Service Identity (MMSI)	503434500
Bridge	VHF channels 10 and 16

Communications:

The next weekly update will be provided on 21 February.

Should you require any further information or have a comment on the survey, please contact Santos on 1800 267 600 or Offshore.Consultation@santos.com

From: Consultation, Santos

Sent: Wednesday, 8 February 2023 2:36 PM

Subject: Barossa Marine Survey - Weekly Update #1

Dear stakeholder,

Santos provided the attached notice of proposed Barossa marine surveys on 1 February 2023, which included a commitment to provide weekly status updates via email. The following is the first weekly update.

Barossa Marine Survey - Weekly Update #1

Date issued:

Wednesday 8 February 2023

Activity Summary:

The Barossa Gas Export Pipeline (GEP) marine surveys will be conducted in accordance with an Environment Plan (EP) accepted by the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA). A survey is scheduled to occur nominally between 22 February and 5 March 2023.

The survey will be carried out from a vessel during daylight hours with survey equipment towed from the vessel's aft. There will be no construction activity involved and the seabed will not be contacted.

The survey will be conducted along a route of approximately 260 kilometres (140 nautical miles) between the below coordinates:

Route	Latitude	Longitude
Start	09° 49.2' South	130° 15.8' E
End	12° 01.4' South	129° 54.5' E

Look Back:

N/A. Vessel not within the survey operational area until 22 February 2023.

Look Ahead:

N/A. Vessel not within the survey operational area until 22 February 2023.

Vessel Details:

Vessel details will be provided closer to the commencement of activities, along with the contact details for the Santos representative.

Communications:

The next weekly update will be provided on 15 February.

Should you require any further information or have a comment on the survey, please contact Santos on 1800 267 600 or Offshore.Consultation@santos.com



















