

Briefing Note – Santos Barossa Gas Export Pipeline Installation

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KEY MESSAGES

- On 13 January 2023 NOPSEMA issued General Direction 1898 to Santos NA Barossa Pty Ltd, SK E&S Australia Pty Ltd and Santos Offshore Pty Ltd (the registered holders) in relation to the Barossa Gas Export Pipeline Installation Environment Plan (the EP).
- The General Direction requires the registered holders to undertake an assessment of any potential underwater cultural heritage that may be affected by the activity.
- On completion of the assessment, the registered holders must update the Environment Plan to reflect any impacts or risks to underwater cultural heritage places which may be identified, including a description of control measures to reduce the impacts and risks to as low as reasonably practicable and acceptable levels.
- An Environment Plan can be updated through a titleholder's management of change (MOC) process without further assessment by NOPSEMA. However, if a significant new impact or risk, or a significant change in impacts and risks arise, a revision is required to be submitted (r 17 (6)) that would then be assessed in accordance with NOPSEMA's assessment policy.
- The registered holders must notify NOPSEMA within 10 days if any activities covered by the EP are to commence and provide a weekly report to NOPSEMA detailing their progress toward satisfying the General Direction.
- While the Environment Plan remains in force and the General Direction doesn't prohibit the start of work on the pipeline installation, NOPSEMA expects that Santos will comply with the written undertaking given to NOPSEMA not to undertake any work until their MoC process is completed.
- Weekly progress reports provided by the registered holders to date confirm that the registered holders continue to defer pipeline construction activities. Further, action has been taken by the registered holders to progress the underwater cultural heritage assessment required by the direction, including conducting an underwater survey on 22 February 2023.
- On 15 February 2023, the registered holders wrote to NOPSEMA seeking confirmation that Santos may conduct pipeline installation activities outside the timetable specified in the EP, including the reasons, without contravening the Environment Regulations. NOPSEMA has considered the reasons, the content of the EP, other records, published guidelines and is preparing a response to Santos.
- NOPSEMA will continue to monitor the weekly progress reports and communication of information from Santos and will consider the need for any further action should this be warranted, including a further environmental inspection of the Barossa GEP Installation activity.

BACKGROUND

- The Barossa Gas Export Pipeline Environment Plan (the in-force environment plan) was accepted by NOPSEMA on 9 March 2020.
- The timetable in the EP for the activity is “Installation of the pipeline is expected to be undertaken sometime between Q3 2021 and Q2 2023 and take up to nine months to complete. However, pre-lay survey could commence up to nine months earlier than pipeline installation (amending the above Q3 2021 (start date) to Q4 2020”
- The in-force environment plan was prepared by ConocoPhillips prior to the title for the pipeline license being transferred to Santos in May 2021.
- Santos updated the in-force EP through an internal management of change (MOC) process in September 2021.
- NOPSEMA conducted an inspection of the activity at Santos’ Perth office on 21-22 December 2022.
- The inspection found that Santos needed to obtain additional information regarding possible impacts and risks of the activity to any underwater Indigenous cultural heritage places along the Barossa Pipeline Route, not addressed in the in-force environment plan.
- NOPSEMA inspectors were not assured, based on the inspection, that Santos’s MOC process would adequately address the potential gaps.
- Based on the findings of the Inspection and given that the activity was planned to commence in January 2023, NOPSEMA determined that enforcement action was required and a General Direction was issued to Santos and the JV parties.
- The registered holders were provided with the opportunity to comment on the content of the Direction prior to issuance and lodged strong objections to the General Direction, particularly on the grounds that it would cause costs associated with delays to the pipeline installation activity timetable.
- Following consideration of written submissions from Santos and their JV partners on the drafts, the General Direction was issued to Santos on 13 January 2023.
- The draft inspection report was provided to Santos on 25 January 2023 and includes the findings from the inspection that resulted in the General Direction, as well as conclusions and compliance advice to Santos to address future non compliance relating to management of information/knowledge, management of change processes and stakeholder consultation.
- The registered holders wrote to NOPSEMA on 10 February 2023 requesting further information and reasons for the issuance of the General Direction further time to consider NOPSEMA’s draft Inspection Report. NOPSEMA has responded with a request for clarification on the request and provided a further extension on the response to the draft inspection report to 25 February 2023.