

From: [REDACTED]
Sent: Fri, 24 Mar 2023 05:47:42 +0000
To: Regulatory Submissions (Shared Mailbox)
Cc: [REDACTED]
[REDACTED] barossa regulatory
Subject: Confidential: Santos General Direction 1898 Report #10
Attachments: Santos to NOPSEMA General Direction 1898 Progress Report WEEK
10_FINAL.pdf

CONFIDENTIAL

Dear [REDACTED] and [REDACTED]

On behalf of Santos and Barossa Joint Venture Parties, please find attached Progress Report #10 on General Direction 1898.

Kind regards

[REDACTED]

Santos

m: [REDACTED]

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

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24 March 2023

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[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; 04, 10, and 17 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.	No activity is planned in the next 10 days.	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.	Wessex Archaeology Ltd (Wessex) advises that their assessment continues, and a draft report is anticipated by ~27 April 2023.	TBC
3.	The experts must: <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 	Santos has been updated by Dr Corrigan that independent expert, anthropologist Dr Stephanie Rusden, has continued to progress their cultural heritage assessment through collection of stories, song lines and oral histories relating to any spiritual and cultural connections and any underwater cultural heritage places during a visit to the Tiwi Islands this week (i.e., week of 20 March 2023).	TBC

No.	Action Required	Status	Anticipated Completion Date
	ii. record and have regard to the information obtained.		
4.	Provide a report containing the assessment to: 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"> <i>a) 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> <i>b) 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> <i>c) a description of any other legislative requirements that apply to the activity and a demonstration of how those will be met; and</i> <i>d) 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

- 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 provided NOPSEMA with responses to the Final GEP EP Inspection Report conclusions 3589-C1 and 2589-C2 on 23 March 2023.