



North West Protection Advocacy
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26 April 2021

To: Santos Ltd
PO Box 859
NARRABRI NSW 2390

Email: energy.nsw@santos.com

CC: gasreg@epa.nsw.gov.au, EPA.Westopsregional@epa.nsw.gov.au,
Rose-Anne.Hawkeswood@planning.nsw.gov.au, Stephen.ODonoghue@planning.nsw.gov.au

Re: COMPLAINT – EPL 20350 – Access to Information

Dear Santos,

North West Protection Advocacy are writing to lodge a formal complaint.

Santos were granted a licence variation to EPL 20350 on the 11th April 2021. 14 days have elapsed and the correct EPL has not been uploaded to the Santos website.

The community expects that you will respond to changes to your licencing requirements in a timely manner and in accordance with your Conditions of Consent. You appear to have not done so and as a consequence NWPA are issuing a formal complaint.

Under the terms of the Consent Conditions of ACCESS TO INFORMATION Santos are required to:

“10. Within 6 months of the date of this consent, the Applicant shall:

(a) make copies of the following publicly available on its website:

(i) the documents referred to in **condition 2 of Schedule 2;**

(ii) all current statutory approvals for the development;

(iii) all approved strategies, plans and programs required under the conditions of this consent;

(iv) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;

(v) a complaints register, updated monthly;

(vi) the annual reviews of the development;

(vii) any independent environmental audit of the development, and the Applicant's response to the recommendations in any audit;

(viii) any other matter required by the Secretary; and

(b) keep this information up-to-date, "

Of particular concern to NWPA are (ii) and (iii).

NWPA do not believe that Santos have fulfilled the ACCESS TO INFORMATION requirements and as such appear to be in breach of their Development Consents.

NWPA refer to the recent changes made to the Environmental Protection Licence 20350.

"C. On 19 March 2021 the Licensee submitted an amendment to the application. The amendment requested further changes to the licence to state that:

i. drilling fluids can be re-used in the drilling process at the Premises, and

ii. rock-based drill cuttings can be applied to land at the Premises."

And;

"L3.3 The licensee may transport and reuse drilling and completion fluids from well sites in accordance with the Waste Management Plan approved under development consent SSD 6456."

and;

"L3.4 The licensee may transport and apply drill cuttings from any of their well sites to land at the Premises in accordance with the Waste Management Plan and Rehabilitation Management Plan approved under development consent SSD 6456."

No Waste Management Plan is available on the Santos NSW website detailing management of drill cuttings and drill fluid recycling.

We would also like to formally object to the last minute inclusions of L3.3 and L3.4 in the S.58 licence variation. The EPA have noted in the new licence issued "On 19 March 2021 the Licensee submitted an amendment to the application." Therefore, this variation took just 23 days to approve.

This should have been a whole separate licence variation application and not have been lumped in with what was already a protracted and complicated variation.

We request that Santos make immediately available on their website the Waste Management Plan upon which this licence variation approval is based.

North West Protection Advocacy