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Attention: Johanna Evans

3 May 2021

Dear Ms Evans

I refer to your letter dated 21 December 2020 requesting information about workover emissions and load-based licensing procedures related to the Narrabri Gas Field.

Responses to your questions are below.

- 1. The list of “Assessable Pollutants” on the EPA website has a broken link: <https://www.epa.nsw.gov.au/licensing-and-regulation/licensing/environment-protection-licences/load-based-licensing/assessable-pollutants> Are you able to send through this list please?**

The link to the list of assessable pollutants is now functioning. Please go to <https://www.epa.nsw.gov.au/licensing-and-regulation/licensing/environment-protection-licences/load-based-licensing/assessable-pollutants>.

- 2. The Australian National Greenhouse Gas Inventory uses an emission factor of 25.9 t CH<sub>4</sub> for well completions regardless of technology type and it seems SCUF emissions are less than this? Does the EPA use these emission factors when calculating Load Based Licensing (LBL)?**

No. Methane is not an assessable pollutant under the EPA’s load-based licensing (LBL) scheme.

- 3. Are Santos required to measure emissions from their workover operations?**

No.

- 4. We would specifically like to know if workover operations will increase LBL for Santos...**

Workover operations will increase LBL fees.

- 5. ...and if the EPA has any way of quantifying and qualifying the emissions produced by the workover of the 13 Santos wells (ie what gasses and how much)?**

The EPA uses a combination of international and site-specific data to quantify emissions from workover activities.

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**6. What cost increase in LBL is likely as a result of these emissions which are additional to normal operations?**

Workovers are part of the normal operation of the Narrabri Gas Field.

A very small increase in LBL fees is likely as a result of workovers, as emissions of Volatile Organic Compounds (VOC) are likely to be less than one percent of the total assessable load of VOCs.

**7. What type of workovers are being conducted?**

The workovers conducted during December 2020 were routine pump maintenance activities. No workovers were conducted in January, February, March or April.

This information is publicly available in the monthly activities reports published on the Narrabri Gas Project website at <https://narrabrigasproject.com.au/about/monthly-updates/>.

**8. Do the wells need outer casing replacement?**

No.

**9. Does this type of workover increase emissions?**

All workovers result in emissions.

Increased emissions during workovers can be attributed to work being undertaken on the well in addition to plant, machinery and vehicles present during the workover.

**10. Is corrosion of the casing occurring?**

The EPA has not been advised of any casing corrosion.

For further information about the EPA's regulation of the onshore gas industry, please visit <https://www.epa.nsw.gov.au/your-environment/gas-industry>.

If you have environmental concerns or complaints, please contact the EPA's Environment line on 131555 or via email at [info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au).

Yours sincerely

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