

Submission detail (where relevant for Santos to address)		Santos Comment																				
Hatch’s																						
1	Now they are going to apply to connect more gas to it to expand but they say they are not sure if they will run it which I am sure they will as they would not be bringing the gas in. The power station is just over 800 metres from our farm house. We are very worried as we already had noise issues with it below the 12 m/w.	The current project approval granted under Part 3A of the <i>Environmental Planning and Assessment Act 1979</i> (EP&A Act) includes approval to expand and operate the Wilga Park Power Station up to a capacity of 40 MW. <u>The proposed modification application does not seek to increase the approved capacity of the power station beyond 40 MW.</u> The conditions of the existing Part 3A project approval impose strict limits on operational noise from the power station to an acceptable level. The proposed modification does not seek to change these noise conditions. In particular, condition 2.8 of the approval requires: <i>The proponent shall implement all reasonable and feasible at-source noise control measures at the Wilga Park power station to ensure that the noise contributions from the operation of the power station at a capacity of more than 12 megawatts, does not exceed the maximum allowable noise contributions specified in Table 2, at... (nearby residences which would include the submitter’s residence)...</i> <i>Table 2 – Maximum Allowable Noise Contribution</i> <table><tr><th>Day</th><th>Evening</th><th colspan="2">Night</th></tr><tr><td>7:00am to 6:00pm Mondays to Saturdays</td><td rowspan="2">6:00pm to 10:00pm on any day</td><td colspan="2">10:00pm to 7:00am Mondays to Saturdays</td></tr><tr><td>8:00am to 6:00pm Sundays and public holidays</td><td colspan="2">10:00pm to 8:00am Sundays and public holidays</td></tr><tr><td>L_{Aeq}(15 minute)</td><td>L_{Aeq}(15 minute)</td><td>L_{Aeq}(15 minute)</td><td>L_{A1}(1 minute)</td></tr><tr><td>35</td><td>35</td><td>35</td><td>35</td></tr></table> In addition, condition 3.5 of the approval requires Santos to undertake noise monitoring, within 90		Day	Evening	Night		7:00am to 6:00pm Mondays to Saturdays	6:00pm to 10:00pm on any day	10:00pm to 7:00am Mondays to Saturdays		8:00am to 6:00pm Sundays and public holidays	10:00pm to 8:00am Sundays and public holidays		L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{A1} (1 minute)	35	35	35	35
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		days of operating the power station above a capacity of 12 MW, and at every stage that new generation capacity is added to the power station, to assess compliance with the maximum allowable noise contributions specified in Table 2 of condition 2.8. Further, Condition 2.10 of the approval requires that if noise monitoring required under condition 3.5 indicates that the operational noise contributions of Wilga Park Power Station, following the implementation of all reasonable and feasible at-source mitigation measures in accordance with condition 2.8, exceed the maximum allowable noise contributions specified in Table 2, Santos shall investigate all reasonable and feasible at-receiver mitigation measures to ensure these noise contributions not exceeded and will make a binding written offer to the affected landowner regarding mitigation options that can be implemented on the property. It should also be noted that Santos has undertaken a number of other measures to assist in addressing the submitter's concerns in relation to the power station. Senior representatives from Santos have met with the submitter on their property on a number of occasions to discuss their concerns and the submitter has also been provided with direct contact details for the locally based Community and Land Team Leader, for any concerns or questions they have. Santos has committed to the submitter that if they still have noise concerns when the facility is restarted that a sound engineer will be commissioned to provide recommendations on further mitigating measures for consideration. The existing conditions of approval impose air quality discharge limits and monitoring requirements. Santos has also undertaken 'background' air quality monitoring and will undertake further monitoring after the facility is restarted.
Wilderness Society		
2	This appears to be a very broad and pre-emptive modification. Approval to use gas at the Wilga Park Power station should only occur once production wells have been approved. This is because of the many inherent risks	The existing Part 3A approval allows the operation of the power station to a capacity of 40MW utilising gas from specified CSG pilot wells. The existing approval does not authorise the drilling and operation of the specified CSG pilot wells. The drilling operation of the pilot wells specified in the existing approval is subject to separate approvals. The application seeks modification of the existing Part 3A approval to enable gas from other wells

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	involved in coal seam gas drilling that require a full Environmental Impact Statement and opportunities for community engagement. It is particularly high risk because the drilling is to take place in a high value eco-system and biodiversity corridor the Pilliga Forest.	within PAL 2 and PPL 3 which are not currently specified in the approval to be utilised in the power station. These include the already approved and constructed wells within PAL 2 (Bibblewindi Multi-Lateral Pilot and Bibblewindi West Pilot), proposed new wells which are subject to a development application (Bibblewindi 31/32) and wells which may be proposed within PAL 2 and PPL 3 in the future. The application does not seek approval for the drilling and operation of these other wells, only the use of the gas from these wells in the power station. In the case of Bibblewindi 31/32 and future wells, the power station would only be able to use gas from the wells if they are approved and constructed. The drilling and operation of any proposed new wells within will be subject to assessment and approval under either Part 4 or Part 5 of the <i>Environmental Planning and Assessment Act 1979 (NSW)</i> which will assess the environmental impact of the drilling and operation and provide opportunities for community engagement in respect of the wells. The application for modification of the Part 3A approval does not seek approval for the drilling and construction of these wells.
3	Allowing the supply of gas from future wells not yet approved, of up to a substantially increased amount is highly premature.	See response above. Santos currently has approval under Part 3A of the <i>Environmental Planning and Assessment Act 1979</i> to expand and operate the power station up to a capacity of 40 MW. The proposed modification application does not seek to increase the approved capacity of the power station beyond 40 MW.
Submission 3		
4	What date was the application made to the Department of Planning and Infrastructure?	The application was submitted to the Department of Planning on 27/11/13.
5	Santos needs to be more specific as to which part of "condition 1 of the project approval is to be amended to refer to this application" (see last sentence of 3.2. use of gas from PAL 2 and PPL 3 on page 7).	The request is simply for Condition 1.1 of the existing approval to be amended so as to require the activity to be carried out in accordance with the current modification application and supporting information. Condition 1.1(h) is sought to be deleted and replaced with: (h) <i>Narrabri Coal Seam Gas Utilisation Project (MP 07_0023 Modification 3</i> prepared by Santos NSW (Eastern) Pty Limited and dated November 2013; and

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		(i) the conditions of this approval". Condition 1.2 is sought to be amended to replace references to 1.1(g) to 1.1(h)
6	Santos, wants to legitimize the branding of multi-level lateral wells as being the same as single level lateral wells, when clearly they are not due to amongst other things, the unknown amount of produced water removed from each lateral in the various coal seams The decision to have the produced gas from future or "worked over and/or improved" wells (by the addition of extra lateral leads) added to existing wells with-in or adjoining the PPL and PEL to the Wilga Park Power Station, should be subject to an Approving Authority. The requested wording change does not identify the coal seams, as the original wording does, this should be corrected. The requested wording change is too open ended and could lead to wells being drilled at many varying levels between the ground surface and the deepest accessible coal seam.	As stated in section 1.2 'Proposed Modification' Santos is seeking modification of the Part 3A approval to allow gas from existing and future CSG wells within PAL2 and PPL3 to be used to fuel the Power Station <u>up to its approved capacity of 40 MW</u>. The drilling and operating of wells (including multi-lateral wells and conversion of single level lateral wells to multi-lateral wells and identification of coal seams) is subject to separate assessment and approval processes under Part 4 or 5 of the <i>Environmental Planning and Assessment Act 1979</i>.
7	If PPL stands for Petroleum Production Lease and PAL stands for Petroleum Assessment Lease, then surely only the gas from the PPL can be used in the Wilga Park Power Station and a return legitimately obtained. Surely, by definition the PAL cannot be used to obtain a monetary return?	A PAL authorises the holder to prospect for petroleum and to assess any petroleum deposit on the land comprised in the lease under the <i>Petroleum (Onshore) Act 1991</i> (NSW). An assessment lease is designed to allow retention of rights over an area in which a significant petroleum deposit has been identified if mining is not commercially viable in the short term but there is a reasonable prospect that it will be in the longer term. A holder of a PAL is allowed to continue prospecting operations and to recover petroleum in the course of assessing the viability of commercial mining.

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8	Some of the wells in PAL 2 are also not on the list as contained in the Modification 3 Application.	As per above comment for issue 6, Santos is seeking approval to allow gas from all existing and future CSG wells within PAL2 and PPL3 at the Power Station. Section 3.2 of the modification application identifies the existing pilot wells within PAL 2, including the Bibblewindi Multi-Lateral Pilot and Bibblewindi West Pilot, from which it is intended to send gas to Wilga Park Power Station. The wells that make up these pilots are identified in section 2.2 of the modification application.
9	Concerns with the potential for corrosion. What measures and inspections will be undertaken to ensure that there will be no possible accidents due to natural dissimilar metal reaction.	There are extensive conditions relating to the design, installation, inspection, operation and maintenance of gas pipelines within PAL2. These conditions are reflective of the requirements of the relevant Australian Standards. In addition, Santos has its own design standards which are adhered to and these always meet or exceed Australian Standards. The proposed riser will be installed in accordance with all relevant conditions and requirements. Corrosion of materials is specifically addressed by physical inspection as required under the design standards. Inspection regimes typically can include magnetic particle, ultrasonic and radiography, depending on the type of material that is inspected.
10	Santos is applying to have Modifications that could be seen to lock in the Leewood Complex as part of the Narrabri Coal Seam Gas Utilisation Project, without having to do a full Environment Assessment. A full Environmental Assessment should be required each time a Modification of any kind to the Exploration Activities in PEL 238 is presented to the Department of Planning and Infrastructure	The modification application and supporting information has provided an assessment of the impacts of the proposed modification. As stated in the application material, any proposed use of gas in plant and equipment at Leewood Produced Water Facility would be subject to further assessment and approvals. The use and operation of the gas extraction infrastructure within PAL 2 would also be subject to separate assessment and approvals under the <i>Environmental Planning and Assessment Act 1979 (NSW)</i>.