

Attention: NT EPA assessments

Re: Supplementary Environmental Report for the Darwin Pipeline Duplication Project

I welcome the opportunity to comment on the Santos Barossa proposal.

I am disappointed to realise that the massive, dirty and controversial project that is the wider Barossa project – one of the filthiest gas fields ever considered – is subject to no greater NT assessment than this SER of the pipeline duplication component.

The pipeline duplication proposal is a component of a larger action, encompassing both the exploitation of the Barossa gas field and the dubious proposal for Sea Dumping of carbon captured during LNG production. The Barossa gas field is particularly ‘dirty’, with uncommonly high CO₂ content. As such, it represents significant environmental harm in the form of massive greenhouse gas pollution, at every stage in the fuel chain. The CCS scheme is a poorly-founded experiment proposal that could well come unstuck at any point from implementation to post-closure. As such it carries significant risk of falling short of the claimed benefit of permanently storing captured carbon pollution. Together, these larger project components represent unacceptable inevitable harm and likely risk to NT and global ecosystems vulnerable to the impacts of runaway climate chaos.

In this age of climate emergency, I find it extremely irrational that the NTEPA has agreed to entertain this sub-component outside the context of the wider objectionable large new fossil fuel exploitation plan.

The previous (referral) process elicited numerous warnings that CCS is unproven. Santos have responded that:

CCS is proven technology, with more than 27 commercial CCS facilities operating around the world today, with a storage capacity of over 36 million tonnes of CO₂ per year

Australia is home to the world’s largest CCS project, at Chevron’s Gorgon LNG off WA’s Pilbara coast. This operating facility has vastly underperformed on the targets set for itself. The WA EPA was duped into approving Chevron’s dirty polluting gas project on the back of promises that the CCS scheme would account for almost half its 8mtpa CO₂ burden. The facility was delayed, never met that target, and has instead has only accounted for a dwindling minor portion since. We would be wise to learn from this example.

The relationship between the pipeline duplication proposal and the exploitation of the Barossa gas field is poorly defined in Santos’ report.

The CCS MOU is a preliminary instrument, that provides inadequate basis for assessment of the detriments of the pipeline duplication. The MOU explicitly acknowledges that feasibility and further assessments are required, and that no decision has yet been made to pursue CCS.

Section 3 tells us that the pipeline duplication plan “enables Bayu-Undan CCS to reduce GHG emissions going to atmosphere from Barossa” - without quantification. Capacity of Bayu Undan is only one factor. How much Barossa CO₂ would be captured? What would be the net emissions reduction (factoring fugitive emissions and energy cost associated with compressing and transporting the CO₂)?

Important pre-feasibility assessments remain unresolved, rendering this pipeline duplication assessment premature. If, for example, the existing pipeline requires re-engineering to be made appropriate for the task (water leaks combined with CO₂ gives carbonic acid, a corrosive), the evaluation of impacts of the duplication vs tie-in could differ greatly. The report admits that an independent Statement of Conformity remains pending, to verify the existing pipeline meets appropriate codes and standards for repurposing. Similarly, relevant Timor Leste agreements are as yet unresolved.

As a new geo-engineering experiment, the long-term stability and integrity of CCS will remain unproven for the life of the Barossa project. We may not have proof of how badly this theory is mistaken until Santos are dead and buried. But what if it arrives late, and underperforms? Whereas Chevron at Gorgon have been able to avail themselves of other offsets on the carbon market, Santos will be entering a new era of a ramping Safeguards Mechanism that sees many polluters competing to access, annually, more offsets than have ever been realised in Australia, totally. The gamble Santos are taking is not between unproven CCS and a suite of fallback offsets, but the gamble between demonstrably unreliable CCS and failure.

I challenge Santos' claim be a fit and proper corporate person.

Earlier this year, it was revealed that Santos had covered up the deaths of three dolphins from an oil spill off the WA coast. An independent senator tabled photos (see attached) showing dolphins floating belly-up in oily water, and a statement by a whistle-blower Santos employee who described the 25,000 litre spill of condensate which occurred near the Lowendal Islands in March 2022.

Also this year, a gas pipeline from the Big Lake gas field to the Moomba processing facility exploded. A report by the industry publication Energy News quoted anonymous Santos workers who described the explosion as a major incident that could have caused a catastrophic outcome.

In each of these recent examples, Santos not only showed disregard for their responsibilities towards accountability and integrity, but actively downplayed and even covered up their culpability. This is behaviour inconsistent with their duty as an approval holder.

This pipeline duplication proposal should be rejected, because it only exists to shore up a poorly-defined and dubious CCS project: which should be rejected, because it only exists to greenwash a massive new fossil fuel error.

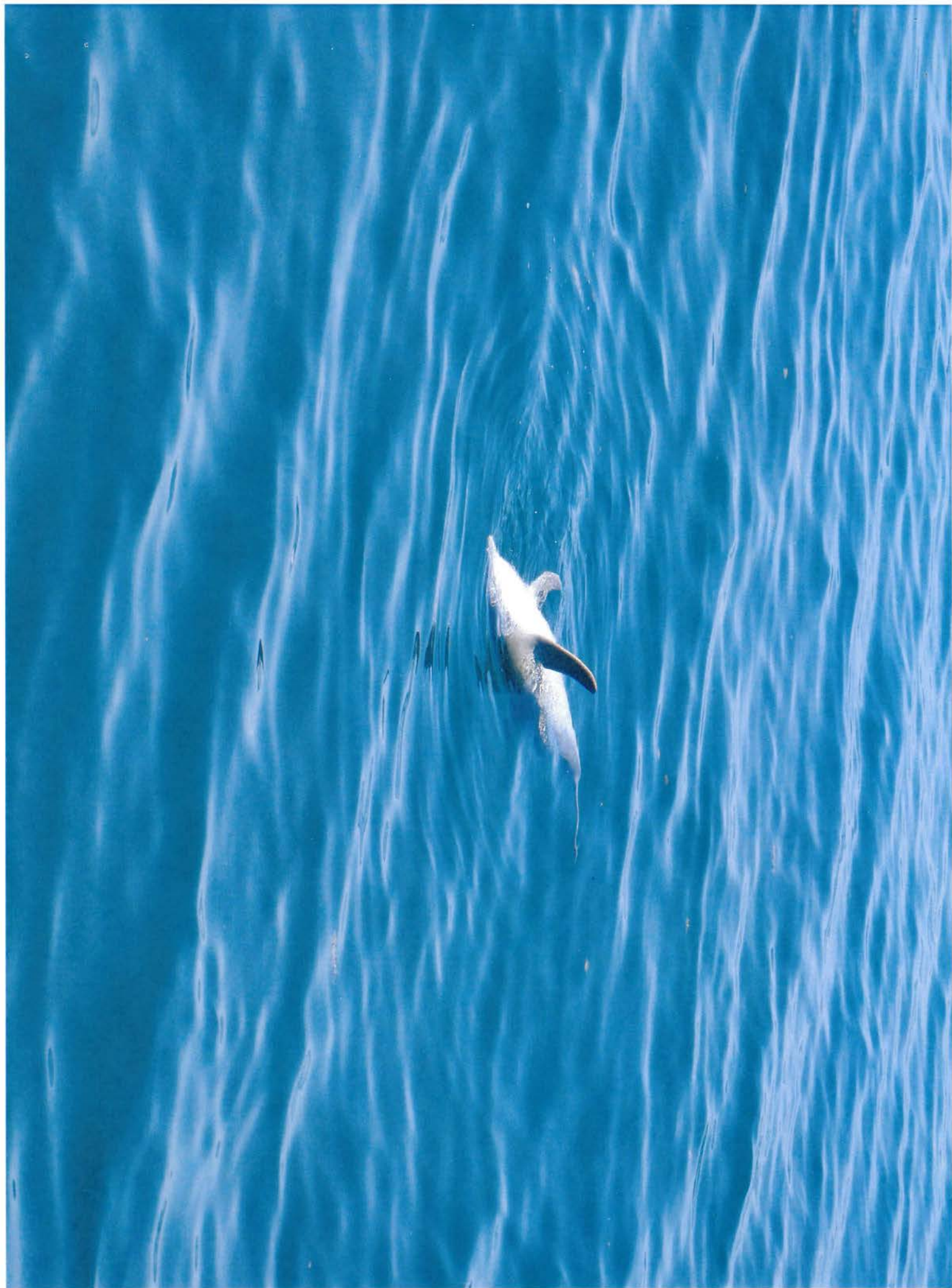
I remain interested in any further opportunity to give the Barossa project greater scrutiny.

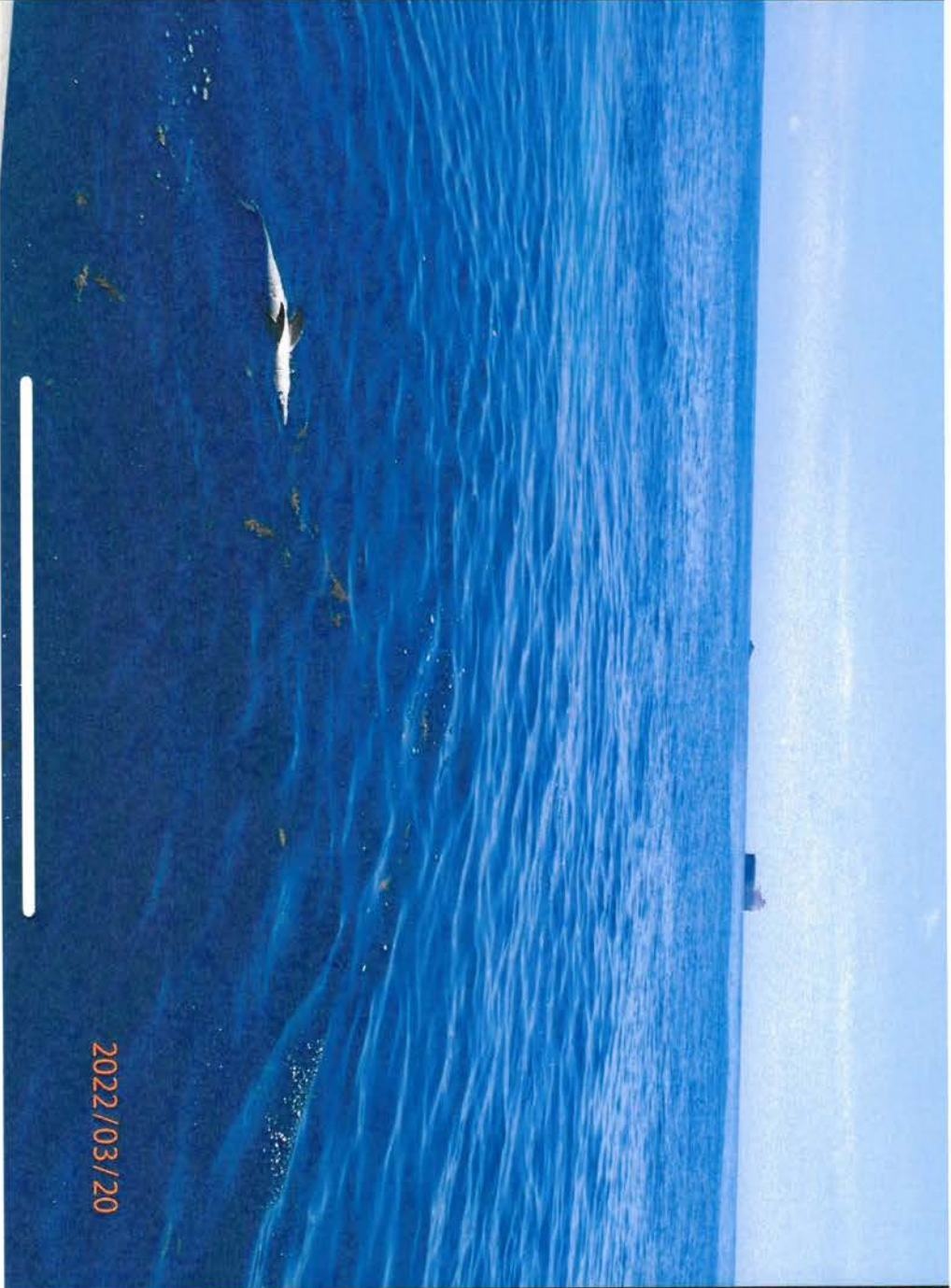
Justin Tutty

ref: <https://www.energynewsbulletin.net/maintenance-shutdowns/news/1450984/big-explosion-at-australias-big-lake-gas-field-leaves-questions-for-santos>

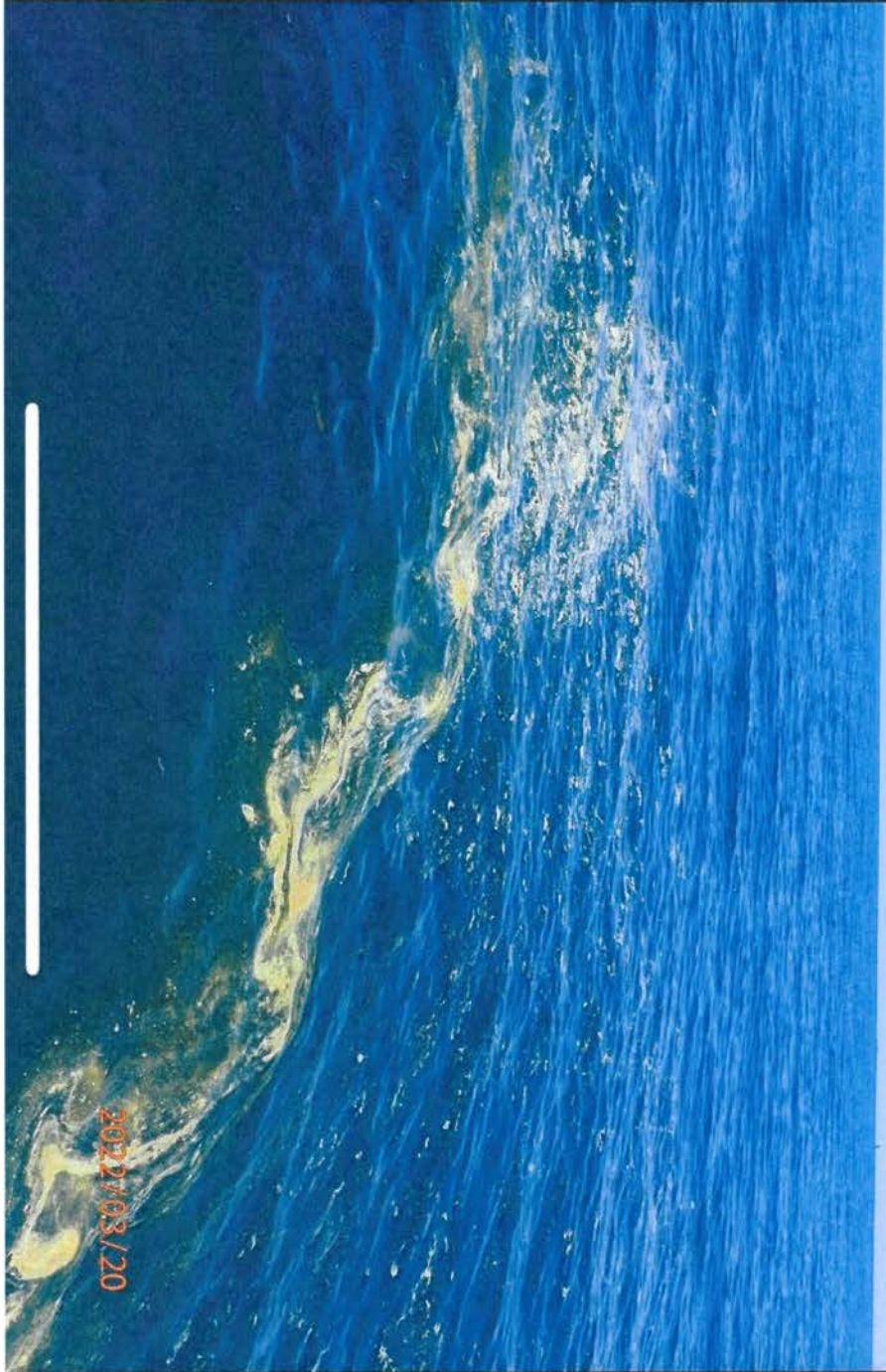








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Marine Terminal Load Out Hose Inspection



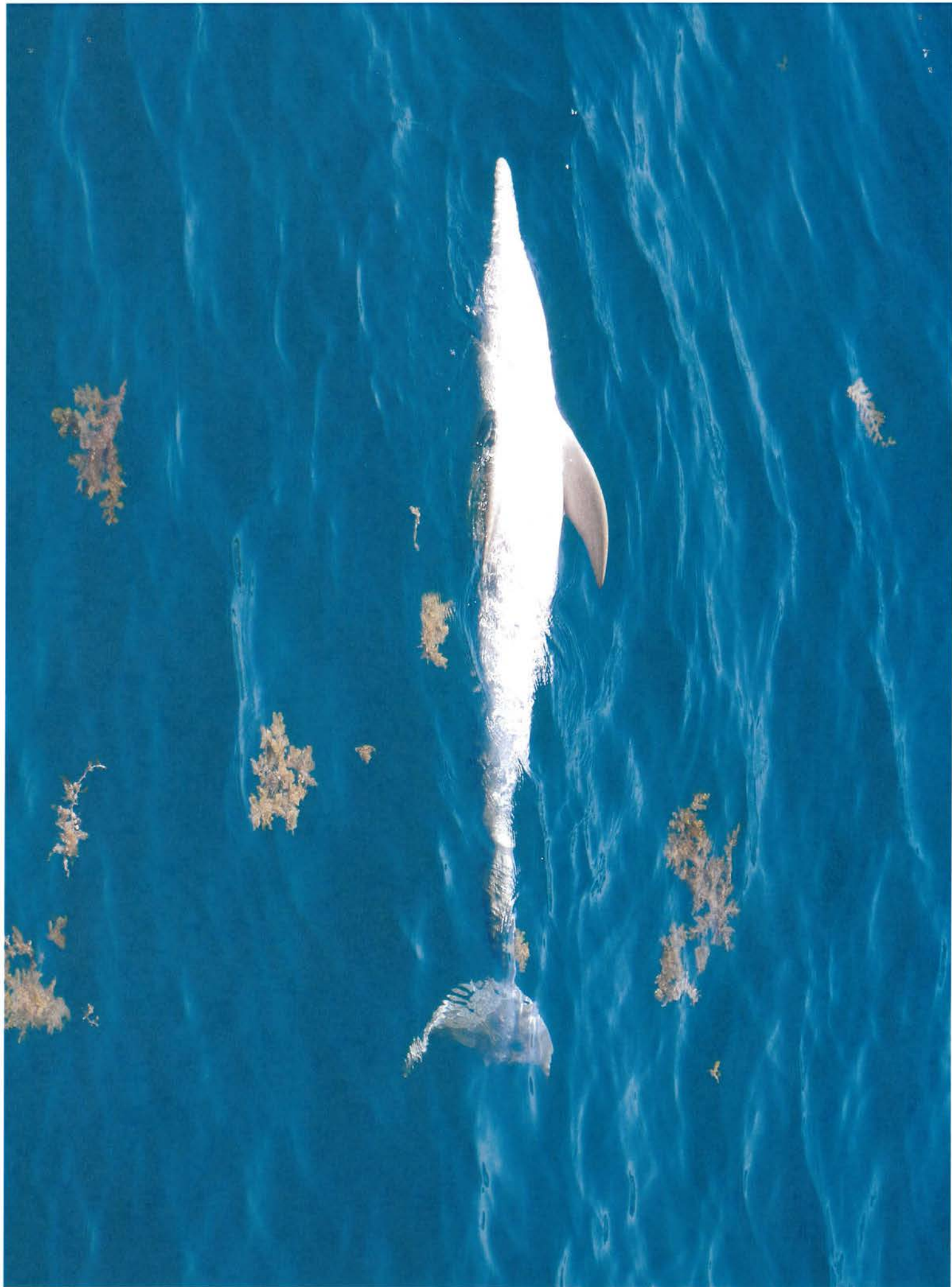
Santos

Submersible hose

N: 7/1811.93
KP: 0.0000
HDG: 203.58
Depth: 24.11
Alt: 0.00

sapura
energy





Statement by a Santos whistleblower (16 February 2023)

In March last year, while working for Santos, a large Australian oil and gas company, I witnessed an incident – and subsequent cover-up – which forced me to confront questions about organisational values and my own responsibility as an employee.

The incident took place 300 kilometres off the coast of Karratha, Western Australia, in the Lowendal Islands – known for pristine white sand beaches, gorgeous blue turquoise water and abundant marine and bird life.

Early one morning at Santos's Varanus Island Gas Plant, a scent of condensate (a light form of oil) filled the island. Over the coming hours we would learn that a subsea hose had been torn as it was loading an oil tanker parked a kilometre from the beach. The tear had been left unidentified for more than 6 hours, pouring a reported 25,000 litres of condensate into the ocean.

Regardless of efforts to cease the spill, the mood on the island became sombre when learning that dead dolphins, including a pup, were found floating in the centre of the spill; in other areas, sea snakes writhed in agony.

The tragedy of dolphin carcasses amid a kilometre-wide oil slick should be the story. But it's not. The story is Santos's subsequent cover-up and total disregard for the values they say they hold dear, values such as accountability and integrity.

'Negligible harm'

A month after the spill I was intrigued when news of the incident surfaced with no mention of impact on local wildlife. I was then shocked at the public comment from Santos: 'the event had negligible harm to the environment'.

Tens of thousands of litres of oil in the ocean, dead dolphins and sea snakes. How was this negligible? Even worse, as I knew, that in defiance of their obligations, Santos had not mobilised environmental assessors to the island until a week after the incident – they could not have known the real scale of impact, it was never checked.

I felt strongly that Santos' comment was baseless, designed to mislead and avoid accountability. I was faced with this or believing I worked at an organisation that truly saw the impact of that day as negligible. What company puts thousands of litres of oil in the ocean, kills dolphins and thinks it is no big deal? Were these 'negligible' events happening elsewhere? How was the bar set so low?

I am aware that employees spoke up about the public comments internally. Senior Santos executives know, or at least should have known, that the company's deceptive conduct was contrary to its internal code of conduct and values and, possibly, the law.

We hoped that, maybe, the situation would be rectified. Instead, the company doubled down. Instead, when news of the dolphin deaths became public late last year, Santos denied any connection. It said: 'These sightings were a couple of hours after the incident, in which time no harm would have resulted from this incident'.

I was shocked, again, to be reading what I can only see as an outright lie. What belief in their ability to deceive the public allows such a transparent lie to be put on record. I was appalled at the culture and management within Santos which demonstrated such wilful refusal to accept responsibility.

These lie spurred me to speak up. This was no longer grey, but a black and white lie from Santos – potentially with market, financial and regulatory consequences. Companies should not be able to lie to the public.

I am confident that no real, objective assessment could confirm Santos's assertion that no harm could come to the local sea life as a consequence of the oil spill.

The facts are simple: multiple dolphins were found dead, floating in dense sections of the oil spill, where fumes were extremely high. It is a lie to state that the condensate would have evaporated within hours of the spill; it was still very much present when the dolphins were found. Santos insisted that the spill of thousands of litres of toxic liquids and fumes into their habitat could have no impact on the dolphins. These images suggest otherwise

Santos – please explain.

Stewardship and a bigger picture

I am aware that in the scale of environmental impacts, a few dead dolphins likely sit low on Santos's scale. However, the lies presented by Santos, so callously to the public, indicate an organisation which is comfortable with a culture of avoiding accountability, and one which does not operate in the interest of the Australian public.

It indicates a belief within Santos that they can operate to avoid public interest through misinformation, supported by a cosy relationship with regulators and government. As an employee who saw very little real effort to be accountable or address the scale of emissions, I question now if their comfort to lie and misrepresent is present in their statements around future climate performance and emissions.

I hope that employees in the industry can read this and be encouraged to speak up against wrongdoing at all levels. I never expected to be faced with this, but I found myself in a situation that I felt was wrong. I wasn't accepting of excuses or avoidance. The lack of accountability, and the nature and frequency of incidents occurring at Santos, made me truly believe that it is in the public interest for this information to be released.

I hope that in a small way, the organisations partnered with Santos through sponsorships or as stakeholders can use this information as insight to guide their decisions. Santos in no way demonstrated care for the environment, accountability nor integrity at the highest levels. They treated the public with disdain. To ask the question bluntly, who wants to be sponsored by a company so comfortable with killing dolphins?

Santos lied to us all – it is not a coincidence to find dead dolphins in the middle of an oil spill. I call on Santos to show some respect for the public, your employees and the dead bottlenose dolphins that I believe your operation killed.