



Queensland
Government

Department of
**State Development,
Infrastructure and Planning**

Our ref: RPI24/005

16 December 2024

Ky-Ann Worthington-Sheppard
Environmental Advisor
Santos Limited
Level 22, 32 Turbot Street
Brisbane QLD 4000
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Dear Ms Worthington-Sheppard

FURTHER REQUIREMENT NOTICE

RPI24/005: Santos – Hector 2, Hector Southeast 3 and Roulette 1 Development
(given under section 44 of the *Regional Planning Interests Act 2014*)

I refer to the assessment application which was properly made on 4 September 2024 under section 29 of the *Regional Planning Interests Act 2014* (RPI Act). The application is seeking a regional interests development approval (RIDA) for resource activity: petroleum and gas for the Santos – Hector 2, Hector Southeast 3 and Roulette 1 Development in the Channel Country Strategic Environmental Area (Designated Precinct) (Channel Country SEA (Designated Precinct)).

Application details

Applicant	Santos Limited ABN 80 007 550 92
Project	Santos – Hector 2, Hector Southeast 3 and Roulette 1 Development
Description	Petroleum wells and supporting infrastructure
Area of regional interest	Channel Country SEA (Designated Precinct)
Proposed disturbance area	42.4 ha

1 William Street
Brisbane Queensland 4000
PO Box 15009
City East Queensland 4002
Telephone 13 QGOV(13 74 68)
Website www.statedevelopment.qld.gov.au
ABN 29 230 178 530

Site details

Real property description Lot 2528 on PH429
Local government area Bulloo Shire Council

Information Requirement

Pursuant to section 44 of the RPI Act, you are advised that further information is required to assist in the assessment of the application against the assessment criteria contained in the RPI Act and the Regional Planning Interests Regulation 2014 (RPI Regulation).

The further information required is detailed in **Attachment A**.

The period in which the information must be provided is a maximum of three months from the date of this notice.

An extension to this period may be requested by the applicant if necessary.

It is noted that in responding to the items raised, it may be necessary to amend or even withdraw the application. The Department is available to meet to discuss the avenues available in this regard.

Another requirement notice may be given if, for example, the response to this requirement notice does not provide sufficient information to assess and decide the application or in response to matters raised in a submission.

If you require any further information, or have any queries, please contact Darren Brewer, Manager - Appeals and Regional Interests, Improvement and Assessment, Planning Group, DSDIP on 3452 7472 or by email at RPIAct@dsdilgp.qld.gov.au who will be pleased to assist.

Yours sincerely



Phil Joyce
A/Executive Director
Improvement and Assessment Division
Planning Group

Encl. Attachment A

ATTACHMENT A

Information required for assessment against SEA criteria – Schedule 2, Part 5 of the Regional Planning Interests Regulation 2014

1.	<p><u>Issue:</u></p> <p>The application material states that the proposal comprises conventional petroleum wells and supporting infrastructure.</p> <p>The response to Issue 1 in Table 1 of Section 2 of Santos' Response to the Requirement Notice (as lodged with DSDIP on 10 October 2024) confirms that the total proposed disturbance in the Channel Country SEA is 42.37 hectares. There are three wells across the project, seven borrow pits and associated other activities that result in the proposed disturbance area.</p> <p>Further, the response to Issue 6 in Table 1 of Section 2 of the abovementioned report clarified that each 'borrow pit' will have a surface area of 6,000m² and a depth of 3m, and the volume of each '...is closer to 12 megalitres..'</p> <p>Schedule 2, Part 5, Item 3 of the RPI Regulation provides a definition of 'conventional gas or oil' and a definition for 'unconventional gas or oil'. Notably, 'conventional gas or oil' does not include "unconventional gas or oil".</p> <p>Under part (b) of the 'unconventional gas or oil' definition, the definition makes reference to gas or oil extraction methodologies – including '(iii) infrastructure which has a high or widespread impact on the environment.' The note immediately following that reference states:</p> <p><i>Examples of infrastructure that may have a high or widespread impact on the environment-</i></p> <ul style="list-style-type: none">• <i>single well sites that disturb an area greater than 1ha or multiple well sites that disturb an area greater than 1.5ha</i>• <i>extensive borrow pits greater than 0.2ha and deeper than 2m</i>• <i>a petroleum facility</i> <p>With respect to the above, it is noted that section 2.2.1 of Santos' Assessment Report (dated 03/09/2024) stated, 'The operations proposed and reservoirs targeted meet the definition of conventional gas or oil as per Schedule 2 Part 5 Section 15 (3) of the RPI Act.' Notwithstanding this statement, given that both the wells site disturbance area and the borrow pits exceed the abovementioned thresholds, there are concerns that the proposal does not qualify as 'conventional gas or oil'.</p>
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	<p><u>Action</u> Please provide a detailed justification explaining why the proposed project meets the 'conventional gas or oil' definition relative to the RPI Regulation. In particular, the response is to explain why the proposed well site disturbance areas and borrow pits, given their size and depth, do not fall under the category of 'unconventional gas or oil' development or water storage (dam), as defined in the RPI Regulation.</p>
2.	<p><u>Issue:</u></p> <p>Further clarity is sought regarding the proposed 'borrow pits'.</p> <p>Table 6 in section 5 of Santos' supporting report (dated 03/09/2024) for the application states, 'The proposed Hector 2, Hector Southeast 3 and Roulette 1 development does not include any of the unacceptable uses prescribed by Schedule 2, Part 5, Item 15(2) of the RPI Reg.'</p> <p>However, the supporting information does not provide an explanation or evidence as to how this conclusion has been reached. Notably, the Channel Country Strategic Environmental Area is fully overlaid by areas with Designated Precinct status. The prescribed solutions in the RPI Regulation identify certain activities as 'unacceptable uses'. Activities that are 'unacceptable uses' are not permitted in the Designated Precinct.</p> <p>'Water storage (dam)' is listed as an unacceptable use - and is also a 'regulated activity', as defined in Part 4, s11(3) of the RPI Regulation. There are concerns the 'borrow pits' are each a water storage (dam).</p> <p>Further, the response to Issue 6 in Table 1 of Section 2 of Santos' Response to the Requirement Notice (as lodged with DSDIP on 10 October 2024) clarified that each 'borrow pit' will have a surface area of 6,000m² and a depth of 3m, and the volume of each '...is closer to 12 megalitres..' Given there are seven borrow pits proposed, this amounts to a large potential storage.</p> <p><u>Action</u> Provide a detailed explanation of how the proposed 'borrow pits' comply with the requirements of Schedule 2, Part 5, Item 15(2) of the RPI Regulation. This should include an assessment of the proposed 'borrow pits' in relation to the prescribed 'unacceptable uses' and the provision of any relevant supporting documentation to justify why the proposed pits are considered necessary. It may be necessary to amend the application to ensure the proposal complies.</p>