

**Do you believe the proposed regulations will encourage investment in the onshore conventional petroleum sector in Victoria?**

No

**If not, what would you like to see improved?**

The industry is very weary of the Government's approach to onshore oil and gas exploration and unfortunately the new Petroleum Regulations do not offer the surety that the industry would like to have confidence in expending very significant sums of money to try and improve the impending dire energy situation across the state. The increased levels of red and green tape proposed to be introduced by the new regulations need to be carefully controlled by the regulator to ensure that they aren't used as a means to hold up developments through protracted lawfare by activists as part of their larger global agenda.

**Do you believe the proposed regulations adequately support community engagement and consultation?**

Yes

**If not, what would you like to see improved?**

Until the moratorium came along and the opposition to exploration became ideological there has been very little issue with lack of community consultation and the communities across which we operated were generally very happy with how the activities were proposed and carried out. The regulations appear to over support the engagement and consultation process and put a lot of power in community and special interest groups (not those who are necessarily directly affected) to be able to tie up the approval process of any activities through protracted lawfare as consultation has to be conducted at every stage and any changes incorporated from the recommendations arising through consultation appear to have to go back for further consultation so it potentially ties proposed activities up in a never ending circular consultation process.

**What are your views on the proposed consultation requirements with the community and affected stakeholders in relation to notice/submissions as part of application process for authorities (e.g. retention and production titles)?**

Companies want to, and do, work constructively with the local communities and landowners as, in the case of retention and production licences, they expect to be there for decades so good relations are essential. The concern is the influence from groups outside the area having as much power as locals to use the regulations as a way to tie up activities indefinitely.

**What are your views on the proposed consultation requirements with the community and affected stakeholders in relation to notice/submissions as part of Operation Plan?**

Until the moratorium came along and the opposition to exploration became ideological there has been very little issue with lack of community consultation and the communities across which we operated were generally happy with how the activities were proposed and conducted. Again these changes appear to be focused at appeasing the wider vested interest groups rather than the local communities directly affected. The regulations appear to over support the engagement and consultation process and put a lot of power in community and special interest groups (not those who are necessarily directly affected) to be able to tie up the approval process of any exploration activities through protracted lawfare as consultation has to be conducted at every stage and any

changes incorporated from the recommendations arising through consultation appear to have to go back for further consultation so it potentially ties proposed activities up in a never ending circular consultation process.

**What are your views on the proposed consultation requirements with the community and affected stakeholders in relation to requirements for community engagement during the life of exploration, retention and production titles (as required in the title application)?**

Generally once a activities have commenced and are ongoing the community pays only a passing interest in them so as long as the amount of consultation/updates is reflective of the community interest, or lack of, then we see this as a constructive addition to the regulations

**What are your views on the proposed consultation requirements with the community and affected stakeholders in relation to requirements to describe community engagement during operations (as required in the Operation Plan)?**

Community consultation and engagement should be based on the local area needs and not just be a one size fits all. Therefore it is suggested that any requirements outlined in operation plans should be as guidelines with the actual consultation reflecting what is necessary on the ground for each operation depending on the issues that are raised by the local community.

**Do you have any suggested improvements to the proposed regulations?**

Yes

**If yes what are your suggested improvements to the proposed regulations?**

As discussed above more emphasis should be placed on the consultation with the directly affected local communities rather than an open ended consultation process that can be hijacked by non local special interest groups acting on behalf of global issues rathert than local concerns.

**Do you believe the proposed regulations ensure that social, economic and environmental factors are adequately considered in decision-making for grant of Exploration, Retention and Production Titles?**

Yes

**If not, what would you like to see improved?**

-

**Do you believe that the proposed regulations ensure that social, economic and environmental factors are adequately considered in decision-making for Operation Plan approval/variation and authority surrender?**

Yes

**If not, what would you like to see improved?**

-

**Are the proposed operation plan requirements to manage risks and impacts likely to be effective specifically as they relate to environment management plans, well operation management plans, code of practice of well operations management and rehabilitation plans?**

Yes

**If not, what would you like to see improved?**

-

**Are the proposed information and reporting requirements likely to be effective specifically as they relate to progress against a work program?**

Yes

**If not, what would you like to see improved?**

-

**Are the proposed information and reporting requirements likely to be effective specifically as they relate to rehabilitation undertaken and changes in liability?**

Yes

**If not, what would you like to see improved?**

-

**Are the proposed information and reporting requirements likely to be effective specifically as they relate to results of monitoring undertaken?**

Yes

**If not, what would you like to see improved?**

-

**Are the proposed information and reporting requirements likely to be effective specifically as they relate to community engagement undertaken?**

Yes

**If not, what would you like to see improved?**

-

**Are the proposed information and reporting requirements likely to be effective specifically as they relate to operational activities?**

Yes

**If not, what would you like to see improved?**

-

**Are the proposed information and reporting requirements likely to be effective specifically as they relate to incidents?**

Yes

**If not, what would you like to see improved?**

-

**Are the proposed information and reporting requirements likely to be effective specifically as they relate to geological data?**

Yes

**If not, what would you like to see improved?**

-

**Do you believe that the new regulations will provide a clear and effective administrative framework that facilitates petroleum development activities?**

No

**If not, what would you like to see improved?**

It would be good if the regulator could generate a template to be used for the public notices to ensure that all of the relevant regulation requirements are met, the public have a standard notice to consider to keep it easier for them to understand and respond to and to provide some consistency across the industry to ensure that all are meeting the same requirements.

Also some clarity from the regulator as to what level of risk is acceptable as nothing is completely risk free and a perceived risk for those less experienced in the industry is not necessarily a real risk in reality.

**Would you like to comment on any other aspects of the proposed regulations?**

Yes

**If yes, please describe**

Apart from formatting and other grammatical corrections that need to be fixed there are a couple of things that need to be clarified:

- How risk, impact and benefit is going to be assessed and by whom?
- Bond requirements need to be better outlined as current correspondence with the department shows that the current assessment process is deeply flawed.
- Will the government/regulators website for the information also have the ability for notifications to be posted and submissions to be made to?
- Further to above will the Minister have forms/templates for consistency
- Do the notices that have to go out for an operations plan have to include the operations plan or just a summary of them?
- Does a notice have to go out for every variation of an ops plan incorporating the consultation process?
- Who determines the appropriate level of consultation?
- Is the regulator going to set out an adequate or minimum level of community consultation?
- What is the minimum qualifications required to supervise operations? Is it supervisory well control qualifications or something more?
- Is the notification required at section 38 after the ops plan has been approved or is this something remaining from the QLD regs which don't require the submission of ops plans just the notification to the minister?
- Why is the acquisition and the processing reporting of seismic surveys 12-18 months whereas all other surveys are 6 months?

- It appears that for the 3D seismic surveys the acquisition and interpretation reports are due at the same time (section 44) which I assume is not correct?
- Section 47 refers to water depth being recorded which I assume needs to be removed and is an oversight from the offshore regs that this section is based on?
- Why the requirement to now give 2/3's of the core as compared to 1/2 previously and what happens if there is not that volume of core remaining after the analysis has been conducted?
- In regards to the gas and fluid samples it will not be possible to provide those volumes if the samples are collected via wireline samplers. What happens if it isn't possible to provide the stipulated volume?
- There is unlikely to be much sidewall core material remaining after sufficient testing has been performed so is it just whatever the remainder is that needs to be submitted? Also 12 months is not a long enough time to properly assess the cores and should be once all necessary work is done on them.
- Palynological slides are required for longer than 12 months so is the regulator requiring the operator to cut a second set for submission?