

# Surveillance Plan

**Activity:**

**Licence:**

**Operator:**

## **Compliance Risk assessment:**

- Are there any particular issues of concern from the capability assessment?
- Does operator have good short term (< 5 completed activities) compliance record for this activity?
- Does operator have good, or increasing long term (> 5 completed activities over more than 1 year) compliance record for this activity?
- Is there good match between company (annual reports) and PIRSA views of compliance?
- Does contractor have experience/good track record working under SA Petroleum Act?
- Are there associated activities to be undertaken by other contractors/sub contractors?
- Are there clearly identified operator personnel with key compliance responsibility?
- Is stakeholder outrage likely for non-compliance?
- Is ongoing stakeholder consultation planned?
- Are remediation costs for non-compliance high for operator?
- Is remediation of non-compliance not practical?
- What aspects of operations can lead to long term negative impacts from non-compliance
- Is activity in type of environment (surface or downhole) not previously accessed for activities?
- Is activity viewed as long-term growth asset for licensee?
- Does licensee have limited financial resources available?
- What issues/non-compliances have been identified from inspections of previous activities by this operator?

(The above risks should be considered for each sub activity as attached)

## **Monitoring activities:**

### **During activity:**

- personnel inductions to be observed/participated in
- Other stakeholders to be invited to observe inductions
- Frequency of on site inspections to be conducted
- Sub-activities/areas/SEO objectives to be focus of inspections
- Progress reports to be reviewed for risk of breach of SEO
- Serious Incidents (or risk areas identified in progress reports) to be investigated by PIRSA
- Take enforcement action (direction) where potential for breach of SEO apparent

### **Completion of activity:**

- Full or sample inspections of sites against SEO
- Sub-activities/areas/SEO objectives to be focus of inspections
- Contact with landholders/stakeholders regarding areas of concern
- Inspection reports on compliance with SEO or other regulatory requirements
- Action any non-compliances detected
- Issues to be considered for approval/surveillance of future activities by this operator

### **Annual report:**

- ensure report refers to the activity undertaken in the period
- ensure compliance can be substantiated by PIRSA surveillance or other hard data
- Action missing or unsubstantiated compliance report
- Ensure non-compliances reported by operator, not previously detected by PIRSA, have been remediated where possible

### **Conditions for activity approval letter:**

- requirement to notify PIRSA at least 48 hrs prior to commencing activities (eg well pad construction, well abandonment)
- ensure PIRSA are invited to risk assessment or induction type activities
- requirement to ensure ongoing consultation with key landholders or stakeholders
- key areas of concern for PIRSA which will be focus of surveillance (in general terms, not specific)

## **Sub activities to be considered**

### Seismic Survey

- Survey site preparation
- Managing the survey operation;
- Abandonment / restoration of seismic lines and upholes
- Technical data gathering and submission.

### Well Drilling:

- Well site /access track construction;
- Well downhole design, construction and completion;
- Well site and access track restoration;
- Downhole abandonment;
- Technical evaluation data gathering and submission.

### Well Production:

- Well downhole design and construction;
- Well operation and maintenance;
- Downhole abandonment;
- Technical data gathering and submission.

### Pipeline Construction:

- Easement location selection
- Easement and trench preparation;
- Pipeline design and construction;
- Restoration of pipeline easement;

### Pipeline Operation:

- Pipeline monitoring and maintenance
- Pipeline decommissioning and abandonment;

Facilities Construction (facilities include processing plants, gas and oil storage, trunklines/flowlines, water disposal ponds, waste disposal, roads, camps and airports):

- Facility site construction;
- Facility design and construction;
- Site restoration
- Technical data gathering and submission

Facilities Operation (facilities include processing plants, gas and oil storage, trunklines/flowlines, water disposal ponds, waste disposal, roads, camps and airports):

- Facility maintenance;
- Facility decommissioning and abandonment;