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19-8-17

Gooday,

Further to the points I raised at the fracking review on 12-8-17 : -

- Attachment 1 shts1+2 giving overview of EPA orders to stop fracking in Oklahoma. Building over 100yrs old started to collapse. This incident re-enforces my comments that risk assessment is far from being an effective tool in the evaluation fracking risks.

- Attachment 2 sht 1 covering the Montara wellhead failure. This states that the NT DoR where making decisions about oil rig operations without any prior experience in such matters. This supports my comments that an independent inspection authority is required to regulate/inspect any fracking operation in accordance with world best practice. Possibly such inspection agencies are:-

Lloyds ( inspection agency )

ABS (American Bureau of Shipping )

DNV ( Det Norske Veritas )

The above not only do Maritime Shipping inspections but offshore oil storage and drilling rigs. DNV has done a lot of work on fracking chemicals. The insurance side of Lloyds have insured fracking wells so some form of independent regulation/inspection would be mandatory. All fracking wells need to be independently regulated/inspected.

- You can either own your own property (freehold ) rent or lease. Regardless of which choice you make any minerals oil or gas under the ground is the property of the State or Territory. Royalties are paid by the extraction company to the Government so as to benefit all citizens.

Indigenous land holders (freehold ) and pastoralists (lessee) should be treated the same regarding compensation claims.

A government authority such as pastoral lease inspectors should access damage occurred and compensation. Any dispute to be settled by mining wardens court with limits on compensation payable.

Any compensation payable to be controlled by the government and spent On improvements ie roads ,house ,dams, improved services ( water,elect and communications ), schools ,hospitals ,airports , employment opportunities ,training even National parks .

This approach would avoid the payment of monies to foreign owned pastoral companies which is not be acceptable.

Pastoral companies and fracking gas companies should be totally independent entities with no connections.

Newspaper stories are emerging where the recent interest in NT pastoral leases is attributed to the possibility of large handouts being made when fracking leases are issued. Its all ready starting to look like the Dan Murphy saga, which is currently gaining momentum.

Regards

Roger Heapy





ebay

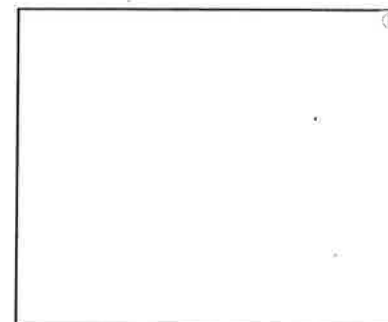


## EPA orders 17 fracking wells shut down in Oklahoma

BY KAREN GRAHAM SEP 7, 2016 IN ENVIRONMENT

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The Environmental Protection Agency shut down 17 wastewater wells in the Osage Nation of northeastern Oklahoma on Tuesday following the 5.6 magnitude earthquake that shook Oklahoma and nearby states on September 3, 2016.



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Because the 17 wells are located on tribal lands, the Oklahoma State Corporation Commission has no jurisdiction over any of the gas and oil producing facilities in the region, reports News Channel 10.

The state's Corporation Commissioner Matt Skinner told the Associated Press the EPA had "confirmed on Sunday they were going to put that directive in place, and today they gave us the numbers."

The 17 wells are located within a 211-square-mile area in Osage County, not too far from where the 5.6 magnitude quake occurred on Saturday. "We've never had to do anything that directly involved Osage County, but on Saturday (the EPA) were quick to respond," added Skinner.

Regional spokesman for the EPA, Joe Hubbard, would not confirm what was going on in Osage County, so we know nothing about the volume of wastewater being disposed of in the wells. Jason Zaun, a spokesman for the Osage Nation, did not return a telephone message seeking comment on the EPA's action.

"We are working closely with the state of Oklahoma, the Bureau of Indian Affairs and the Osage Nation to evaluate available information and take appropriate next steps to protect public health and the environment," Hubbard said in a statement, according to The Spokesman-Review on Wednesday.

The Osage Nation Reservation, also known as Osage County, covers 2,300-square-miles of land in northeastern Oklahoma and is the state's largest county. The tribe

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**DIGITAL JOURNAL**ts and because it is federal land, the Oklahoma Corporation Commission has no jurisdiction.

"We have no data whatsoever on oil and gas activity in Osage County," Skinner said. "We don't know how many (wells). We don't know how deep. We know nothing about them."

In related news, two more earthquakes magnitude 4.1 and 3.6 rattled an area in northwest Oklahoma on Tuesday. Earthquakes of a magnitude of 3.0 or greater have been linked to the underground disposal of wastewater from oil and natural gas production.

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In this case it seems that the lines of responsibility for accepting the poor cement job are clear and that Halliburton does not bear much of the blame. Whether that will be the case for the Gulf of Mexico incident remains to be seen. One doubts that Halliburton are pleased their name has been associated with both incidents, but they do not have many peers in their line of work so it could easily be coincidence.

**In summary, as at April 2009 when the H1 Well had been suspended and the West Atlas rig had departed from the Montara WHP to undertake other work, not one well control barrier in the H1 Well had been satisfactorily tested and verified, and one barrier that should have been installed was missing. In other words, the H1 Well was suspended without regard to PTTEPAA's own Well Construction Standards or sensible oilfield practice.**

Having worked in the industry, my impression was that most operators are working pretty hard to prevent accidents like this. The quotes from the inquiry above suggest that is not the case, with the Thai operator in this case failing to meet the most basic requirements for safe drilling. How many other two-bit (thanks for the pun Euan) operators are there operating round the world in such a cavalier and incompetent fashion?

### **Inquiry Findings**

The inquiry did not mince words:

**In essence, the way that PTTEPAA operated the Montara Oilfield did not come within a 'bulls roar' of sensible oilfield practice.** The Blowout was not a reflection of one unfortunate incident, or of bad luck. What happened with the H1 Well was an accident waiting to happen; the company's systems and processes were so deficient and its key personnel so lacking in basic competence, that the Blowout can properly be said to have been an event waiting to occur. Indeed, during the course of its public hearing, the Inquiry discovered that not one of the five Montara wells currently complies with the company's Well Construction Standards. Indeed, so poor has PTTEPAA's performance been on the Montara Oilfield, the Inquiry considers it is imperative that remedial action be instituted.

### **Offshore Industry Regulation**

The Northern Territory is too small to manage the regulation and oversight of the oil industry, and a new national regulator has been recommended - this would seem well overdue!

The Northern Territory has also contended that 'at all material times prior to the [Blowout], the Territory appropriately administered the licence area within which the Montara Wellhead Platform is located'. The Inquiry has no hesitation in rejecting this contention.

*and again...*

The Inquiry is of the view that nothing should detract from the primary responsibility of PTTEPAA to ensure well integrity. **However, the Inquiry finds that the NT DoR's regulatory regime was totally inadequate, being little more than a 'tick and flick' exercise.**

By way of example, when PTTEPAA submitted an application to suspend the H1 Well utilising PCCCs rather than a cement plug, it received preliminary approval in 30 minutes. However, as the Inquiry heard from the manufacturers of the particular PCCC used, they were not intended to be used as barriers against a blowout. In this respect, the information that had been conveyed to the NT DoR was seriously deficient. However the NT DoR, which had no real prior experience with PCCCs, gave almost immediate approval for their use.