



**Government  
of South Australia**

**Department for  
Energy and Mining**

[REDACTED]

By email: [REDACTED]

Dear [REDACTED]

I am writing in relation to your application made under the *Freedom of Information Act 1991* (FOI Act) in which you requested access to the following documents:

On 19 December 2022, Bloomberg News reported that a satellite flying over South Australia's Cooper Basin on 23 November 2022 identified a methane plume near a natural gas pipeline owned by Epic Energy South Australia Pty Ltd (Epic Energy) (<https://www.bloomberg.com/news/articles/2022-12-18/methane-cloud-over-australia-coincided-with-pipeline-gas-release>). Citing an email from the South Australia Department for Energy and Mining (Department) dated 15 December 2022, Bloomberg News reported that an investigation by the Department found that Compressor Station 1 on the Moomba to Adelaide Pipeline experienced a pressure safety valve gas release on 22 and 23 November. An email from [REDACTED] Epic Energy, dated 16 December, confirmed a pressure safety valve gas release on the Pipeline on 22 November and 8 December. According to analysis by geoanalytics company Kayros SAS, the methane plume had an estimated emissions rate of 46 tonnes of methane an hour. Our client [REDACTED] seeks access to the following documents in the possession of the Department:

- a) any reports, advices or analyses prepared in relation to pressure safety valve gas releases on the Moomba to Adelaide Pipeline in November and/or December 2022;
- b) any correspondence (including electronic correspondence) to or from Epic Energy (including any directors, employees, agents or subsidiaries of Epic Energy) about pressure safety valve gas releases on the Moomba to Adelaide Pipeline in November and/or December 2022;
- c) any file notes of conversations and/or records of meetings about pressure safety valve gas releases on the Moomba to Adelaide Pipeline in November and/or December 2022; and
- d) any other documents relating to pressure safety valve gas releases on the Moomba to Adelaide Pipeline in November and/or December 2022.

From 22 November 2022 to 22 December 2022.

In accordance with Premier and Cabinet Circular PC045, if you are given access to documents as a result of this FOI application, details of your application, and the documents to which access is given, may be published in the agency's disclosure log. A copy of PC045 can be found at <http://dpc.sa.gov.au/what-we-do/services-for-government/premier-and-cabinet-circulars>.

A search has been conducted and ten (10) documents were discovered that fall within the scope of your application. The documents are identified in the attached schedule. In respect of the documents, I have determined as follows:

#### **Documents 1, 4, 5, 6 and 10**

I have determined that these documents should be released in part.

The parts to which I have not granted you access are the details of third parties, including names, mobile telephone numbers and email addresses, and the mobile telephone number of an employee.

Under Clause 6(1) of Schedule 1 to the FOI Act, a document is an exempt document if its disclosure would involve the 'unreasonable disclosure of information concerning the personal affairs of any person'. This information falls within the definition of personal affairs under the FOI Act and is therefore exempt from release pursuant to Clause 6(1).

In addition, information not relevant to your application has been marked as "Out of scope".

#### **Documents 2, 3, 8 and 9**

I have determined that these documents should be released in full.

#### **Document 7**

I have determined that this document is exempt in full.

The document I have not granted you access to is a piping and instrumentation diagram (P&ID) relating to a private company.

Under Clause 4(2)(a)(v) of Schedule 1 to the FOI Act, a document is an exempt document if it contains matter the disclosure of which could reasonably be expected to endanger the security of any building, structure or vehicle.

In considering the grounds for exemption of information under Clause 4(2)(a)(v), I have considered the public interest for and against disclosure.

I acknowledge the strong public interest in fulfilling the objects of the FOI Act, including promoting openness and accountability within government agencies. Other factors in favour of disclosure include providing applicants with documents of special interest to them.

Factors weighing against disclosure include the public interest in protecting the security of third-party assets and public safety. Disclosure of the P&ID would release information not available publicly. I have considered the likelihood that the information may be exploited by those intent on damaging structures, which would endanger the security and safety of the infrastructure, and the safety of people nearby, and would interrupt the gas supply into Adelaide. I have also taken into account the objections to disclosure raised by the third party.

On balance, I have determined that it is contrary to the public interest to release this information which has been redacted under Clause 4(2)(a)(v).

Under Clause 7(1)(c) of Schedule 1 to the FOI Act, a document is an exempt document if it consists of information concerning the business, professional, commercial or financial affairs of any agency or any other person. This document contains information concerning the business and commercial affairs of a private company, the disclosure of which could reasonably be expected to have an adverse effect on those affairs.

In considering the grounds for exemption under Clause 7(1)(c), I have considered the public interest for and against disclosure.

I acknowledge the strong public interest in fulfilling the objects of the FOI Act, including promoting openness and accountability within government agencies. Other factors in favour of disclosure include providing applicants with documents of special interest to them.

Factors weighing against disclosure include the public interest in protecting the commercial and business affairs of third-party companies. I have considered that the P&ID remains relevant to the private company and its ongoing business and commercial affairs. Disclosure of the document would release information not intended to be available publicly. The information may be exploited by those intent on damaging structures, which would endanger the security and safety of the infrastructure, and the safety of people nearby, and would interrupt the gas supply into Adelaide. This would adversely affect the business, professional, commercial and financial affairs of the company. I have also considered the objections to disclosure raised by the third party.

In addition to the above, I do not consider that the objects underpinning the FOI Act, which is to promote openness and accountability within government and agencies and to facilitate public participation in government decision making, would be materially advanced by disclosure of this document.

On balance, I have determined that it is contrary to the public interest to release the information that has been redacted under Clause 7(1)(c).

## **Exemptions**

For your information, the following exemptions apply:

### **4—Documents affecting law enforcement and public safety**

- (2) *A document is an exempt document if it contains matter the disclosure of which—*
- (a) could reasonably be expected—*
    - (v) to endanger the security of any building, structure or vehicle; and*
  - (b) would, on balance, be contrary to the public interest*

### **Clause 6 – Documents affecting personal affairs**

- (1) *A document is an exempt document if it contains matter the disclosure of which would involve the unreasonable disclosure of information concerning the personal affairs of any person (living or dead).*

### **Clause 7 – Documents affecting business affairs**

- (1) *A document is an exempt document –*
- (c) If it contains matter –*
    - (i) consisting of information (other than trade secrets or information referred to in paragraph (b)) concerning the business, professional, commercial or financial affairs of any agency or any other person; and*
    - (ii) the disclosure of which –*
      - (A) could reasonably be expected to have an adverse effect on those affairs or to prejudice the future supply of such information to the Government or to an agency; and*
      - (B) would, on balance, be contrary to the public interest.*

### **Appeal Rights**

If you are dissatisfied with this decision, you are entitled to exercise your rights of review and appeal as outlined in the attached documentation.

If you have any queries in relation to your application, please contact me via email [DEM.FOI@sa.gov.au](mailto:DEM.FOI@sa.gov.au).

Yours sincerely



Julianne Cirson  
**Accredited FOI Officer**

8 March 2023

## SCHEDULE OF DOCUMENTS

Freedom of Information application by [REDACTED] seeking access to:

On 19 December 2022, Bloomberg News reported that a satellite flying over South Australia's Cooper Basin on 23 November 2022 identified a methane plume near a natural gas pipeline owned by Epic Energy South Australia Pty Ltd (Epic Energy) (<https://www.bloomberg.com/news/articles/2022-12-18/methane-cloud-over-australia-coincided-with-pipeline-gas-release>). Citing an email from the South Australia Department for Energy and Mining (Department) dated 15 December 2022, Bloomberg News reported that an investigation by the Department found that Compressor Station 1 on the Moomba to Adelaide Pipeline experienced a pressure safety valve gas release on 22 and 23 November. An email from [REDACTED] Epic Energy, dated 16 December, confirmed a pressure safety valve gas release on the Pipeline on 22 November and 8 December. According to analysis by geoanalytics company Kayrros SAS, the methane plume had an estimated emissions rate of 46 tonnes of methane an hour. Our client, [REDACTED] seeks access to the following documents in the possession of the Department:

- a) any reports, advices or analyses prepared in relation to pressure safety valve gas releases on the Moomba to Adelaide Pipeline in November and/or December 2022;
- b) any correspondence (including electronic correspondence) to or from Epic Energy (including any directors, employees, agents or subsidiaries of Epic Energy) about pressure safety valve gas releases on the Moomba to Adelaide Pipeline in November and/or December 2022;
- c) any file notes of conversations and/or records of meetings about pressure safety valve gas releases on the Moomba to Adelaide Pipeline in November and/or December 2022; and
- d) any other documents relating to pressure safety valve gas releases on the Moomba to Adelaide Pipeline in November and/or December 2022.

From 22 November 2022 to 22 December 2022.

Doc No	Description	Exemption Clause(s)	Determination
1	Email dated 7 December 2022	Clause 6(1) – Personal affairs  Information not relevant to your application has been marked as “Out of scope”	Document released in part
2	Attachment 1 to email dated 7 December 2022		Document released in full
3	Attachment 2 to email dated 7 December 2022		Document released in full
4	Email dated 8 December 2022	Clause 6(1) – Personal affairs  Information not relevant to your application has been marked as “Out of scope”	Document released in part

<b>Doc No</b>	<b>Description</b>	<b>Exemption Clause(s)</b>	<b>Determination</b>
5	Email dated 13 December 2022	Clause 6(1) – Personal affairs  Information not relevant to your application has been marked as “Out of scope”.	Document released in part
6	Email dated 14 December 2022	Clause 6(1) – Personal affairs	Document released in part
7	Attachment 1 to email dated 14 December 2022	Clause 4(2)(a)(v) - Law enforcement and public safety  Clause 7(1)(c) - Business affairs	Document exempt in full.
8	Attachment 2 to email dated 14 December 2022		Document released in full
9	Attachment 3 to email dated 14 December 2022		Document released in full
10	Email dated 15 December 2022	Clause 6(1) – Personal affairs	Document released in part

**Whelan, Natalie (DEM)**

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**From:** Greenwood, Jack (DEM)  
**Sent:** Wednesday, 7 December 2022 4:15 PM  
**To:** Clause 6(1)  
**Cc:** Clause 6(1); Pepicelli, Dominic (DEM); Malavazos, Michael (DEM); Sapa, Piotr (DEM)  
**Subject:** FW: Methane emissions detected near Moomba-Adelaide pipeline  
**Attachments:** 2022-11-23-Australia Methane Release.png; Screenshot 2022-12-07 160409.png

**OFFICIAL**

Hi Clause 6(1),

Further to my call early this afternoon, we've received the below email regarding the detection of methane via satellite at a rate of 45.77 tons/hr (time period for this rate is not provided) on 23 Nov 2022 according to Bloomberg News in Tokyo. Have also provided a map below showing the coordinate provided for the methane detection (green marker). Note there is at least a 23km error radius on this coordinate, so the point of detection could be elsewhere in the greater area.

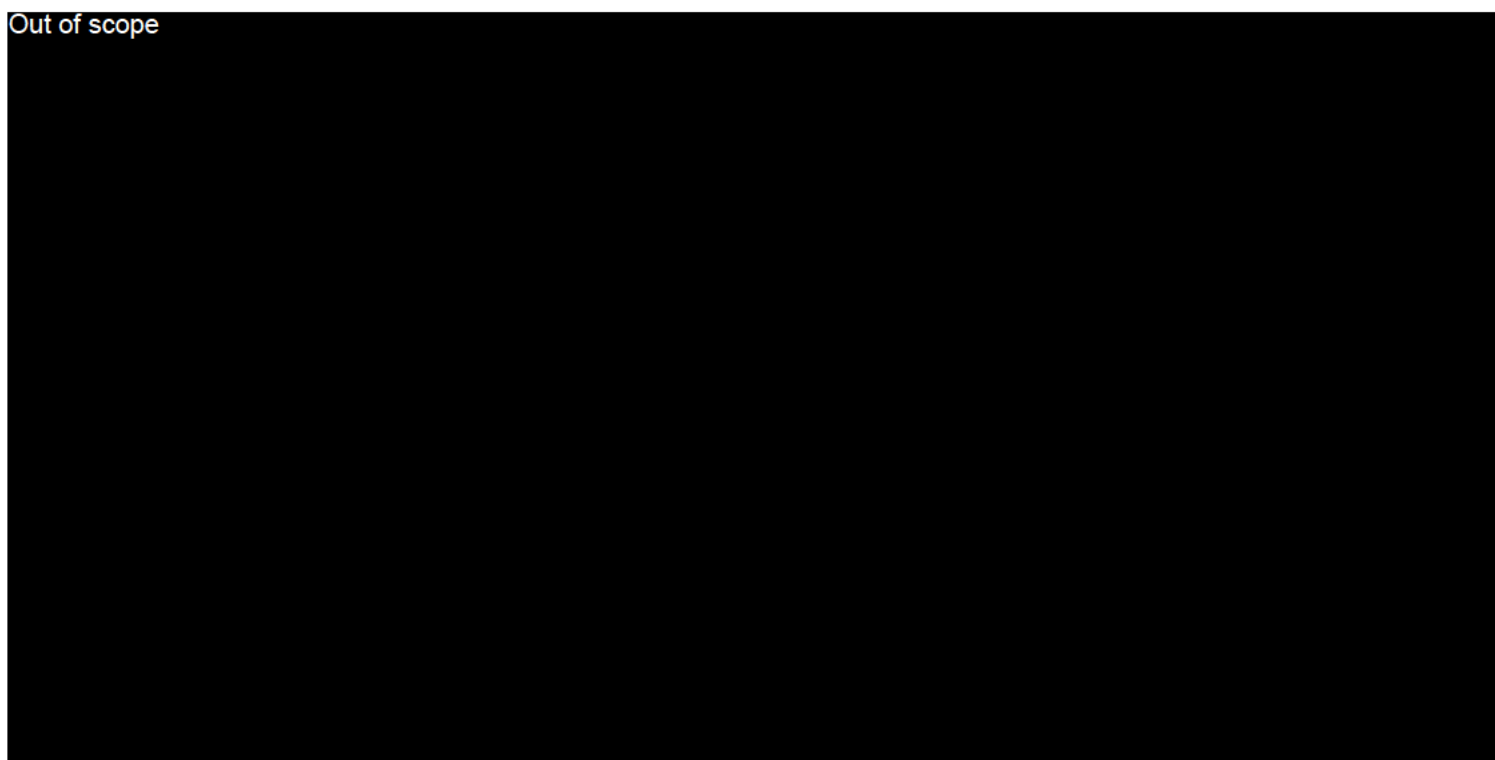
Thanks for clarifying earlier on the phone that there had been no incidents or major work undertaken on that date at CS1 which could have resulted in a significant release, I was just following up as I recalled that around this time the testing for the scoping for the CS1 pig trap isolation valve replacement was being undertaken. I just wanted to clarify if that activity overlapped with these dates ? or if there was any venting undertaken as part of that testing?

Thanks,

**Jack Greenwood**  
Engineer – Pipelines and Facilities

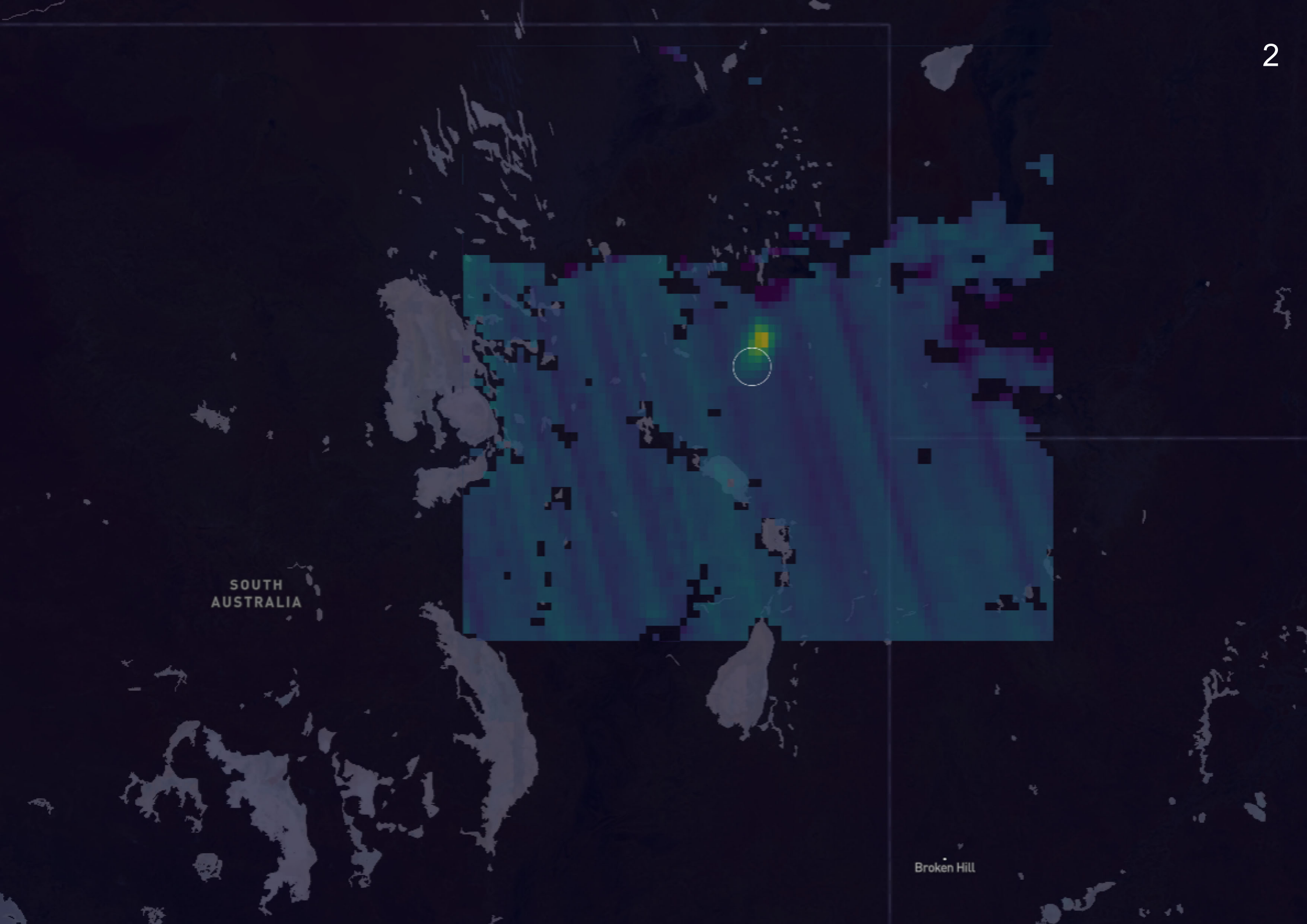
Department for Energy and Mining  
T: 08 842 92934

Out of scope



Out of scope









**Whelan, Natalie (DEM)**

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**From:** Clause 6(1) @epic.com.au>  
**Sent:** Thursday, 8 December 2022 9:28 AM  
**To:** Greenwood, Jack (DEM)  
**Cc:** Clause 6(1); Pepicelli, Dominic (DEM); Malavazos, Michael (DEM); Sapa, Piotr (DEM)  
**Subject:** RE: Methane emissions detected near Moomba-Adelaide pipeline

Hi Jack,

There were no incidents or major works undertaken on those dates in the vicinity of the coordinates provided which could have resulted in a significant release. We are not aware of any methane release in the area which have resulted from our operations.

We do note that oil and gas operations in the Cooper Basin do extend into this area so it may have been associated with upstream oil and gas operations.

Regards

Clause 6(1)



**Epic Energy South Australia Pty Ltd**  
 Level 6, 70 Franklin Street Adelaide SA 5000

**T** Clause 6(1) **F**+61 8 8349 6493 **M** +61 Clause 6(1)  
**E** Clause 6(1)@epic.com.au

[epicenergy.com.au](http://epicenergy.com.au)

---

**From:** Greenwood, Jack (DEM) <Jack.Greenwood@sa.gov.au>  
**Sent:** Wednesday, 7 December 2022 4:15 PM  
**To:** Clause 6(1) @epic.com.au>  
**Cc:** Clause 6(1) @epic.com.au>; Pepicelli, Dominic (DEM) <Dominic.Pepicelli@sa.gov.au>; Malavazos, Michael (DEM) <Michael.Malavazos@sa.gov.au>; Sapa, Piotr (DEM) <Piotr.Sapa@sa.gov.au>  
**Subject:** FW: Methane emissions detected near Moomba-Adelaide pipeline

**CAUTION:** This email originated from outside the organisation. Do not act on instructions, click links or open attachments unless you recognise the sender and know the content is safe.

**OFFICIAL**

Hi Clause 6(1),

Further to my call early this afternoon, we've received the below email regarding the detection of methane via satellite at a rate of 45.77 tons/hr (time period for this rate is not provided) on 23 Nov 2022 according to Bloomberg News in Tokyo. Have also provided a map below showing the coordinate provided for the methane detection (green

marker). Note there is at least a 23km error radius on this coordinate, so the point of detection could be elsewhere in the greater area.

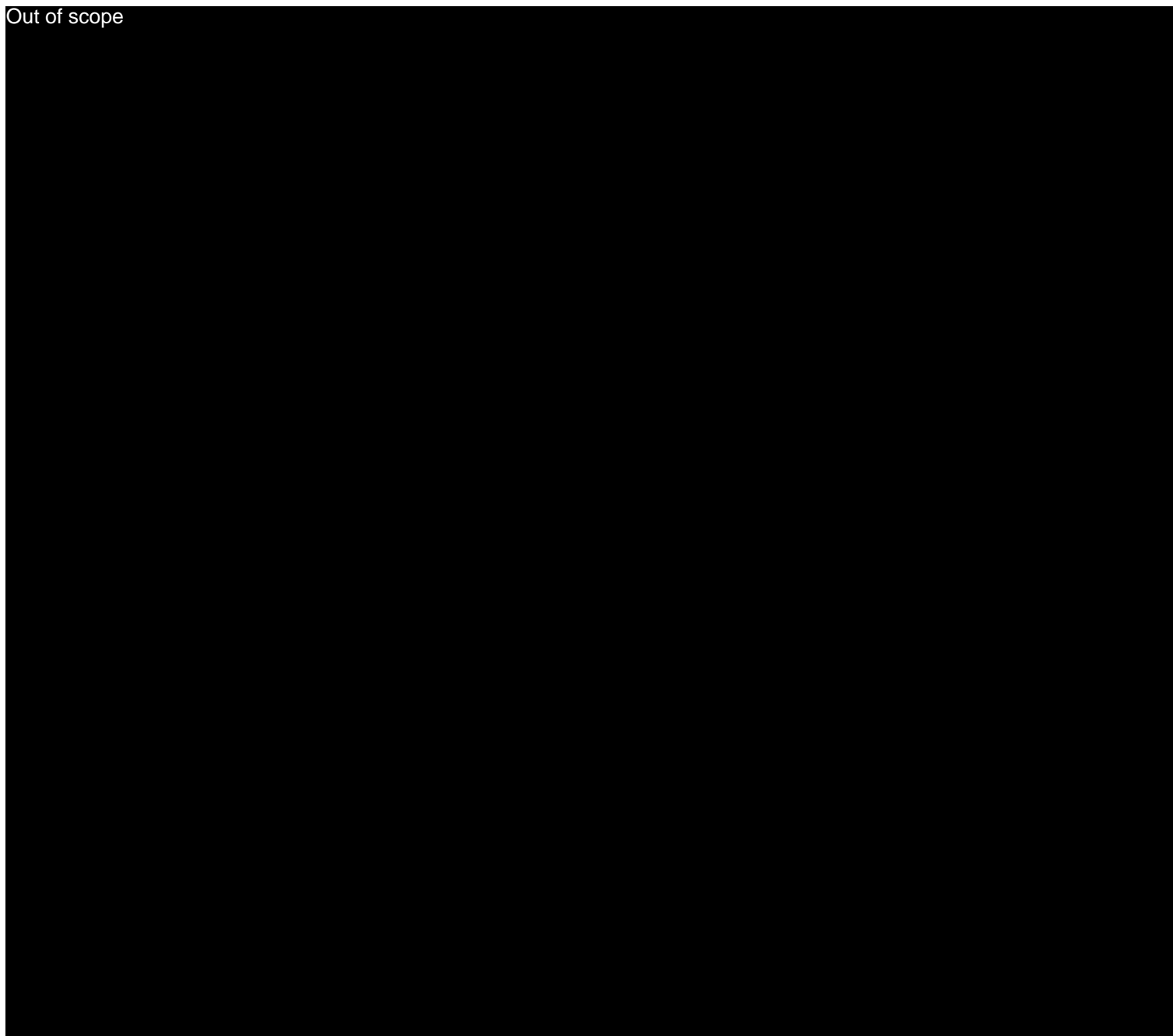
Thanks for clarifying earlier on the phone that there had been no incidents or major work undertaken on that date at CS1 which could have resulted in a significant release, I was just following up as I recalled that around this time the testing for the scoping for the CS1 pig trap isolation valve replacement was being undertaken. I just wanted to clarify if that activity overlapped with these dates ? or if there was any venting undertaken as part of that testing?

Thanks,

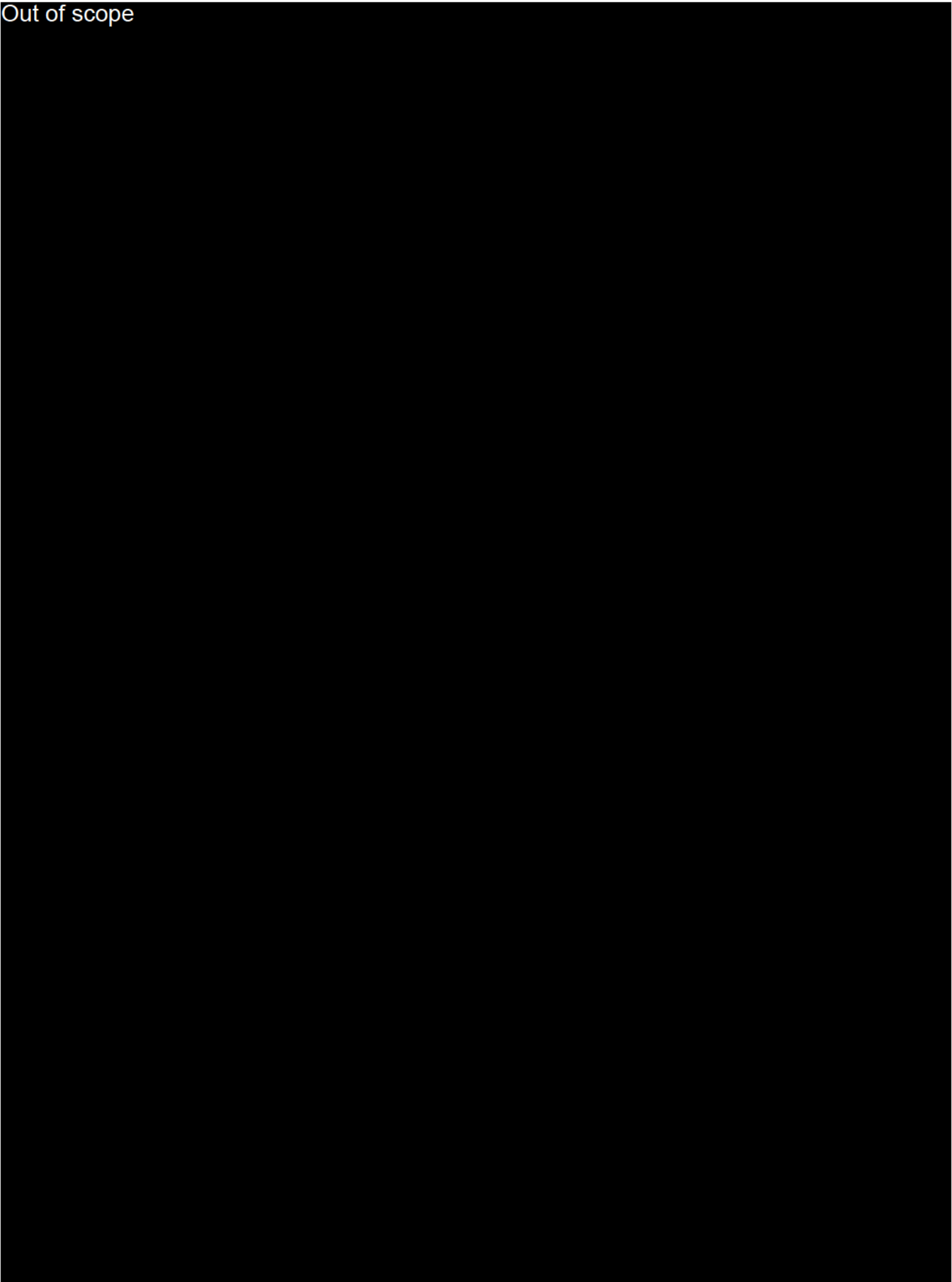
**Jack Greenwood**  
Engineer – Pipelines and Facilities

Department for Energy and Mining  
T: 08 842 92934

Out of scope



Out of scope



**Whelan, Natalie (DEM)**

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**From:** Malavazos, Michael (DEM)  
**Sent:** Tuesday, 13 December 2022 5:51 PM  
**To:** **Clause 6(1)**  
**Cc:** Draysey, Rebecca (DEM); Panagopoulos, Nick (DEM); Pepicelli, Dominic (DEM); Spencer, Jarrod (DEM); Sapa, Piotr (DEM); Greenwood, Jack (DEM)  
**Subject:** FW: Methane emissions detected near Moomba-Adelaide pipeline and Moomba Plant area

**OFFICIAL**

Hi gentlemen,

Please see following email from Bloomberg Journalist providing some additional information on the technology they utilised to pick up methane release they reported last week. Please also note that today I and others here in DEM hooked up via zoom with **Clause 6(1)** to discuss. He advised that he is happy to hold off publication of article on this until late Thursday by which time I'll confirm with him whether or not I have been able to ascertain any further information regarding potential source(s) of this detected methane plume.

I advised him from my perspective, at this stage I have no evidence to provide any firm statement as to the source or cause of such a gas release but will continue to investigate.

In keeping with my commitment, I request if you could please review daily operation records on your respective facilities and wells and other field operations so as to ascertain or otherwise any significant methane release on or within a day or two either side of the 23<sup>rd</sup> November 2022 within a 50 km radius (the declared accuracy of this technology). The image provided represents an instantaneous release equivalent to approximately 1 Million ft<sup>3</sup> per day and is the first such instance where he has detected such a plume in this location from 4 years of daily monitoring.

Could you please double check your records for any blow down operations of gas wells, venting of gas from pig receiver or launch barrels, facility vents (including Moomba Plant) etc. and advise me of your findings even if you confirm NIL. I apologise for repeating the request that Dominic and Jack from my team made to you last week while I was away overseas, however, after speaking to the journalist this afternoon I am of the view that based on these methane measurements and reliability of this technology further investigation into this apparent once off release is warranted.

I'd be happy to arrange a Microsoft Teams meeting to discuss further should you consider that valuable to do so. We may want to consider acquiring this data over the last couple of years and correlate the accuracy ourselves against recorded release operations (significant short term well blow downs, venting etc.). I am very keen to understand this in more detail given I would expect public inquiries into the article as soon as it is published and DEM will need to be in a position to respond accordingly.

Regards

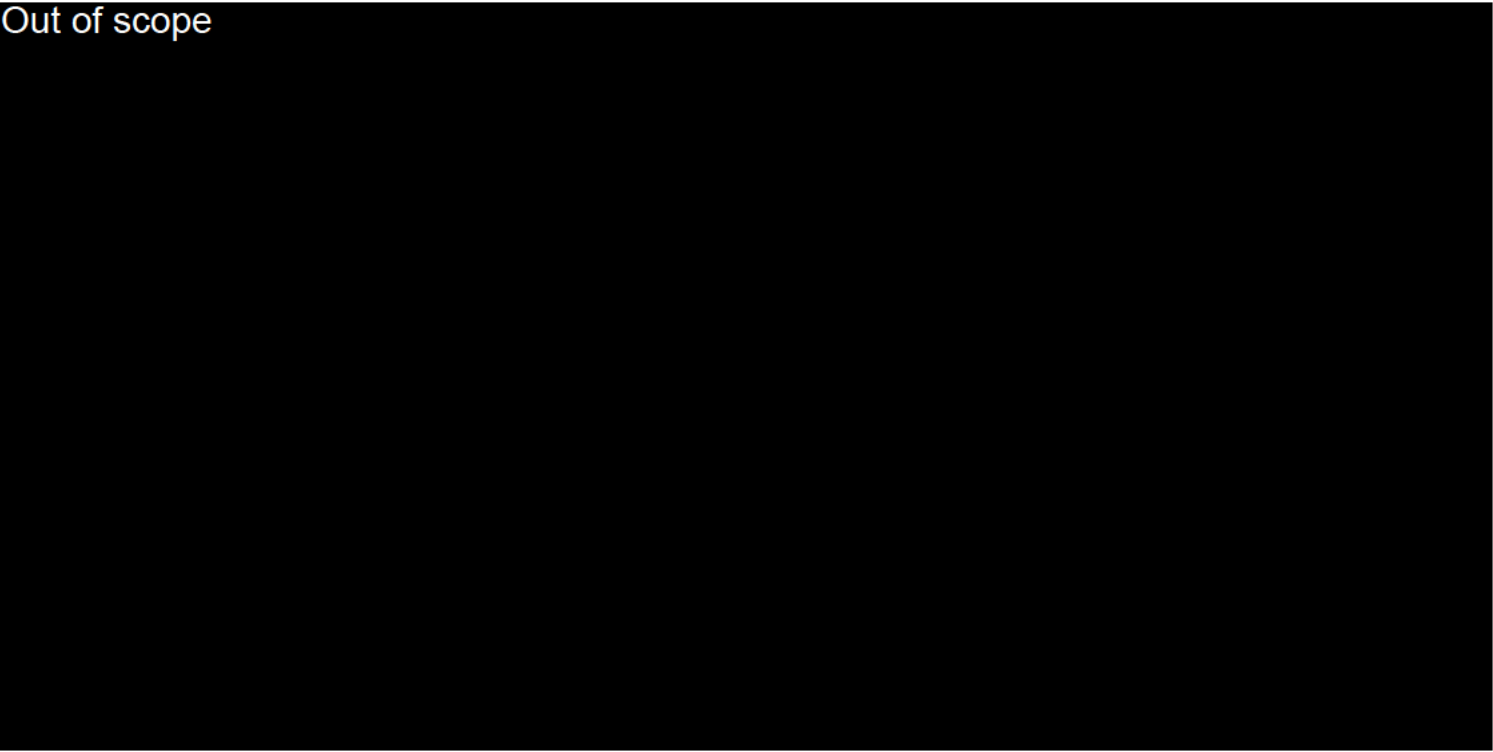
**Michael Malavazos**  
 Director Engineering Operations

Department for Energy and Mining  
 T +61884292470 | M **Clause 6(1)** | E [Michael.Malavazos@sa.gov.au](mailto:Michael.Malavazos@sa.gov.au)

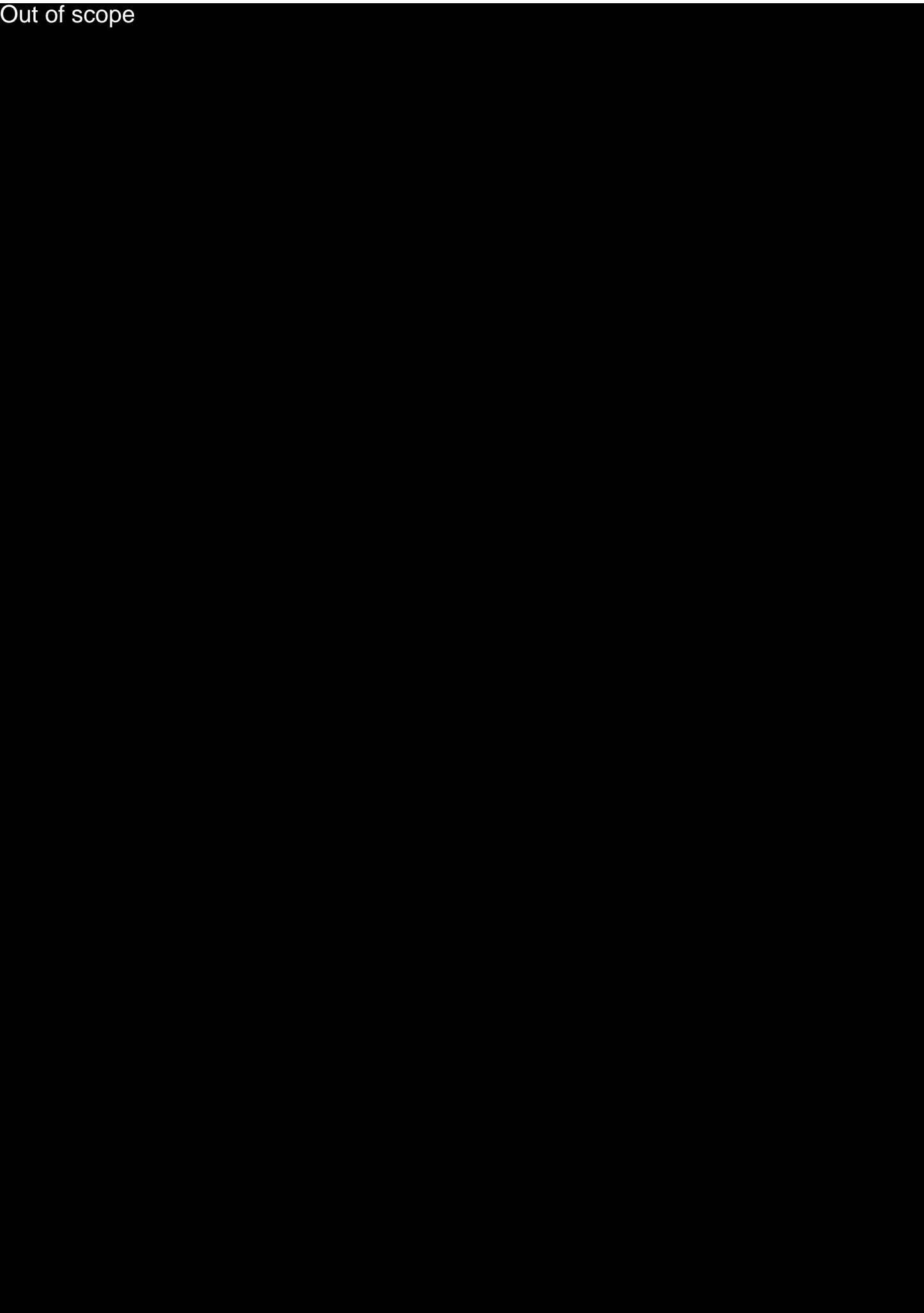
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Out of scope

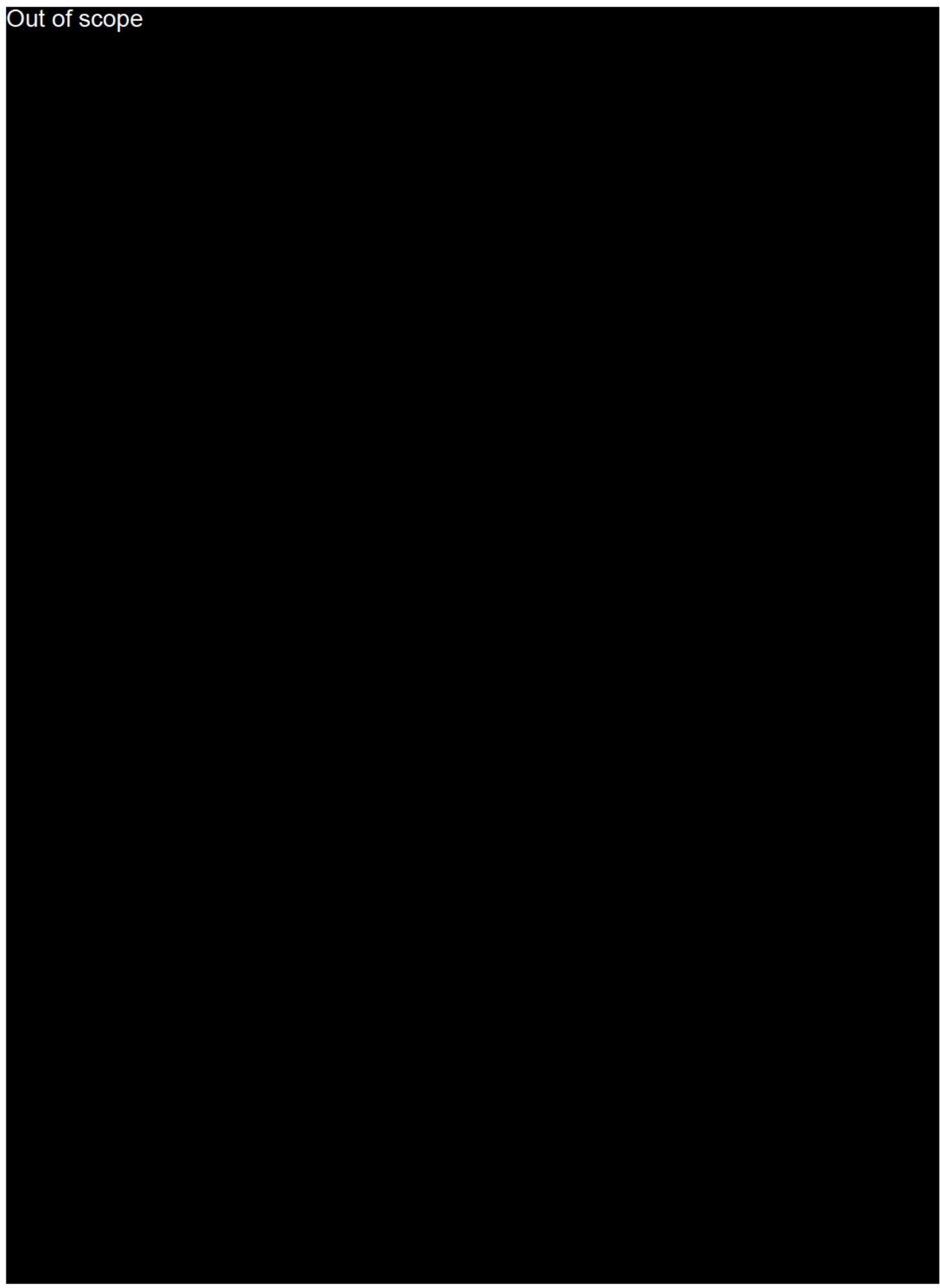


Out of scope





Out of scope



**Whelan, Natalie (DEM)**

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**From:** Malavazos, Michael (DEM)  
**Sent:** Wednesday, 14 December 2022 5:29 PM  
**To:** Clause 6(1); Clause 6(1)  
**Cc:** Greenwood, Jack (DEM)  
**Subject:** FW: CS1 iso valve testing FYI  
**Attachments:** CS 1.png; CS1 distance.jpg; Screenshot 2022-12-14 145430.png

**OFFICIAL**

Further to my last email, please see attached P&ID and maps that are pertinent to any discussions tomorrow.

Regards

**Michael Malavazos**  
 Director Engineering Operations

Department for Energy and Mining  
 T +61884292470 | M Clause 6(1) | E [Michael.Malavazos@sa.gov.au](mailto:Michael.Malavazos@sa.gov.au)

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**From:** Greenwood, Jack (DEM) <[Jack.Greenwood@sa.gov.au](mailto:Jack.Greenwood@sa.gov.au)>  
**Sent:** Wednesday, 14 December 2022 5:23 PM  
**To:** Malavazos, Michael (DEM) <[Michael.Malavazos@sa.gov.au](mailto:Michael.Malavazos@sa.gov.au)>  
**Subject:** CS1 iso valve testing FYI

**OFFICIAL**

**Jack Greenwood**  
 Engineer – Pipelines and Facilities

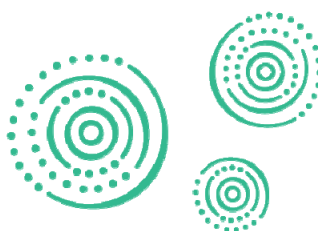
**Engineering Operations**  
**Energy Resources Division**  
 Department for Energy and Mining  
 T (08) 8429 2934  
 E [Jack.Greenwood@sa.gov.au](mailto:Jack.Greenwood@sa.gov.au)  
 W [www.energymining.sa.gov.au](http://www.energymining.sa.gov.au)



GPO Box 320, Adelaide, South Australia 5001  
 Kaurna Country, Level 7, 11 Waymouth Street, Adelaide, South Australia 5000



**Government of South Australia**  
 Department for Energy and Mining









Measure

Line measurement (Geodesic)

Segment: 29.57245 Kilometers  
Length: 29.57245 Kilometers

Sum Lengths: 29.57245 Kilometers

139.8778992, 28.48320007

Caspian Sea

C32







**Whelan, Natalie (DEM)**

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**From:** Clause 6(1) @epic.com.au>  
**Sent:** Thursday, 15 December 2022 2:06 PM  
**To:** Malavazos, Michael (DEM); Greenwood, Jack (DEM)  
**Cc:** Clause 6(1)  
**Subject:** CS1 Methane Release Discussion

Hi Michael,

Summary of details from our discussion at 13:00 this afternoon:

1. Epic received an email from Bloomberg on 7/12 re methane emissions. At the time there was no indication of any issue, Epic responded 7/12.
2. Epic received an email from DEM on 7/12 re Bloomberg query to DEM. At the time there was no indication of any issue, responded 8/12.
3. Incident with CS1 PSV failing at pressure lower than set-point (this unusual design has a soft seat) occurred on 8/12. This was identified by personnel on site.
  - a. Immediate response and action over the next few days to resolve the incident and restore site to normal operation (PSV, Pilot & Sensor overhauled and calibrated).
4. Following the initial response, further investigation occurred with the following indications that there was an earlier PSV failure overnight on the 22-23/11.
  - a. Faulty PSV Sensor but able to review the Raw signal,
  - b. Gas Unaccounted For records, and
  - c. Leak detection system alerts.
5. Unable to reliably determine the duration or magnitude of the venting.
6. Investigation process is continuing to identify all actions that we need to take to manage potential repeat at this or other locations.

Based on our discussion, DEM will respond to Bloomberg advising that the cause of the methane detected was failure of a PSV with no further investigation required.

Have a great Christmas!

Cheers,

Clause 6(1)



**Epic Energy South Australia Pty Ltd**  
 Level 6, 70 Franklin Street Adelaide SA 5000

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**E** Clause 6(1)@epic.com.au

[epicenergy.com.au](http://epicenergy.com.au)

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