

Submission Text: My expertise is in gas and oil well P&A campaigns, specifically the decommissioning happening in [REDACTED] the Esso pipeline in Bass strait. Methane is around 80 times the potency of CO₂ over 20 years, and Plug and Abandonment campaigns are ineffective at containing methane. So that sucks.

AOG wells are not only a methane problem. Unplugged or degraded wells pose serious health threats to local communities as they contaminate aquifers, release toxic volatile organic compounds and—under certain pressure conditions—even pose explosion hazards. They also threaten the long-term viability of carbon capture and storage (CCS) in affected formations, where leakage through legacy wellbores can undermine containment integrity. In short, there are many ways it can go wrong.

We've known for decades that plugging wells under the pressure of the ocean often leads to containment failure, with some estimates as high as 26% of plugged wells springing a leak. In fact, the campaign currently happening in Bass strait has had two containment failures already, according to the community consultation sessions held by Exxon. There is no monitoring program. There are 440 wells in Bass strait currently being plugged, and there is no government or industry funded monitoring program to ensure containment. NOPSEMA has no funding or obligation to monitor these wells, and Exxon ceases their lease once the wells have been plugged (hence the A in P&A).

A common occurrence is the "orphaning" of wells, where no operator is legally responsible for upkeep of plugged wells, particularly in Australia where the onus for regulation bounces between maritime, the state EPA, NOPSEMA or the federal climate change department. In some countries, Australia included, a small number of multinational firms are associated with a disproportionate share of legacy emissions (Exxon, woodside, Santos, chevron). This raises the possibility of retrospective accountability frameworks, where past emitters could be held financially responsible for cleanup. Such an approach could support just transition strategies, particularly in resource-limited settings where national governments inherit the burden of remediation. I have limited hope for this personally, given our minister for the environment has picked up the nickname "Minister for Woodside," but I digress. Bottom line, make these companies pay for the damage they are responsible for, given it's

made them their ridiculous profits. They will always defer to shareholder revenue unless they are legislated to be responsible. The initial EP for the bass decommissioning campaign proposed a 15m dredge in corner inlet, a Ramsar wetland. That last fact is a little irrelevant, but still pretty startling that Exxon thought that was a cool idea.

If this submission has any recommendation or through line, it is that:

1. Most importantly, companies responsible (or anyone at all) be made to fund monitoring programs for Plug and Abandonment wells to ensure containment (again, this isn't some large scale operation, I'm suggesting like 4 dudes on a tinny go out with equipment to check for hydrocarbon leaks on P&A wells)
2. Some kind of remediation or penalty be instituted for companies responsible for P&A containment failure (and as a starting point, for dissolved leases on plugged wells, or orphaned wells, the companies initially responsible for containment failure be made to return and fix the well leaks), and, ideally, retroactive penalty for methane emissions. This is particularly relevant in light of the recent Santos gas tank leak.

Attached is a cool graph and an important study to back this up. That I'm sure the relevant persons have read.

(<https://academic.oup.com/nsr/article/12/7/nwaf184/8137905>)