



**Australian Government**

**Department of the Environment and Energy**

## **Response Template: Mandatory Reporting of Petroleum Statistics**

The Consultation Paper on Mandatory Reporting of Petroleum Statistics asks 23 questions to help the Department of the Environment and Energy to design an effective mandatory reporting program, while minimising the reporting burden on petroleum companies.

To help stakeholders develop their response to the Consultation Paper, the Department developed this response template. **Use of the template is optional** and responses submitted in other formats will be accepted.

**There is no need to answer all the questions** in the template. However, please address any question which is relevant to you.

**Please submit your response via email to [mrps@environment.gov.au](mailto:mrps@environment.gov.au) before close of business on 28 October 2016.** Responses submitted after 28 October may not be considered when determining the final design of mandatory reporting.

The Department aims to advise all respondents to the Consultation Paper of the final design of mandatory reporting before the end of 2016.

Mandatory reporting commences on 1 January 2018.

Please send any questions to [mrps@environment.gov.au](mailto:mrps@environment.gov.au). You can also call the Energy Security Office on 02 6275 9740.

### **Directions:**

The questions in the Consultation Paper have been combined into six key questions.

**Please enter your response in the white box for each key question**, writing over the guidance notes provided. You can also delete the prompting questions.

Once you have finalised your comments, **please email your submission** as an attachment to the Department of the Environment and Energy at [mrps@environment.gov.au](mailto:mrps@environment.gov.au).

### Key Question 1: How do you use the Australian Petroleum Statistics?

*BHP Billiton Petroleum does not use the APS report for internal processes. It is occasionally referred to by our Singapore based Petroleum Marketing organisation for general industry production/sales numbers.*

### Key Question 2: The Design Principles and Options

*BHP Billiton's preference is Option D – comprehensive mandatory reporting.*

*The concept of an aligned and consolidated reporting method is supported, provided there is assurance the nominated single reporting body will handle data delivery to relevant Government stakeholders and that data security requirements are adequately addressed. The single method should include the various petroleum products (oil and gas), as well as production and reserves.*

*We consider the current reporting boundaries are appropriate but the process and technology could be improved to drive efficiency. Provision of detailed monthly data should preclude the requirement for submission of quarterly and annual summary reports.*

*Gas production data for many assets is already in the public domain through websites such as the WA Gas Bulletin Board: <https://gbb.imowa.com.au/#home>*

### Key Question 3: Who Should Report?

*As a petroleum producer BHP Billiton supports the obligation to continue reporting on production and stocks / reserves.*

### Key Question 4: What Data Should Be Reported?

*As an upstream petroleum producer, only production and stocks apply to our operations. We report detailed production to NOPTA plus end of month stocks. We separately report field level production and stocks to the Department of Industry, Innovation and Science for the APS report.*

*Industry reports separately on emissions and discharges from production facilities that also include repetition of the production data. While it is beyond the scope of the current discussion to include the emissions and other environmental reporting, these data consumers should be included in the production data sharing discussion.*

### Key Question 5: How Should Data Be Reported?

*As an Upstream Petroleum producer, only a small subset of the product categories apply to our operations and this does not present an excessive reporting burden. We therefore consider the APS reporting categories that apply to us are appropriate.*

*Data reported in the APS is consolidated and presents few commercial sensitivity issues. However, the detailed well by well level data reported to NOPTA has significant sensitivity. Data granularity and its impact on commercial sensitivity would need to be addressed in any unified report system.*

*Provision of detailed monthly data should preclude the requirement for submission of quarterly and annual summary reports.*

*While existing Microsoft Excel templates are an improvement over some existing ad-hoc reporting methods, this does not represent best practise for the either the reporting entity or data consumer.*

*To leverage the effort required to develop a comprehensive secure reporting system, the preference is to use a technology that is readable by multiple data consumers not just those with access to the data template. Existing petroleum industry production data interchange standards such as PRODML (a family of XML and Web Services) could be a suitable model. Correctly implemented, the reports constructed for Australian Mandatory Reporting of Petroleum Statistics could be adapted for multiple data reporting requirements.*

*It is recognised that development of a complete Australian Government Petroleum data reporting system may take more time than the 2018 implementation target. Microsoft Excel templates could be an acceptable interim solution that defines the required data.*

*Email is acceptable only as an interim delivery measure. More efficient and secure forms of data transmission are preferred over email as a permanent solution.*

*The proposed timeframe is acceptable provided the data submission format is made available in a timely manner to facilitate internal approval for data release, development and testing of reporting tools.*

#### **Key Question 6: Data-Sharing**

*We support data sharing of NOPTA offshore production figures to replace the need to report offshore data subject provided on-forwarded data is rolled up to field and permit level in order to protect commercially sensitive information inherent in well-by-well production data.*

#### **Free Text**

*BHP Billiton Petroleum welcomes the Department of the Environment and Energy's initiative to examine the options for improving the efficiency of reporting upstream and downstream Petroleum industry statistics associated with introduction of Mandatory Reporting of Petroleum Statistics.*

*In our view, the preferred solution will be to implement a secure single point reporting mechanism to Government along the lines of successful systems in use in several jurisdictions worldwide. It is acknowledged that existing legislation will require amendment to permit data sharing with the target data consumer, but the long term benefits in terms of reporting efficiency and improved transparency justify the resourcing investment.*

*A number of major Petroleum producers are already equipped to securely deliver data to Government portals in other countries and would be well placed to provide advice on the most appropriate technologies. A suggested way forward could be to assemble a joint Industry / Government working group to recommend a technical solution in parallel with consultation on the details of the data to be collected and the associated aggregation / confidentiality attributes.*

*BHP Billiton is prepared to participate in such a working group.*