



# TRI-STAR PETROLEUM COMPANY

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Greenfields Applications  
National Competition Council  
Level 21, 200 Queen Street  
MELBOURNE VIC 3000

Copy by email: [GLNG@ncc.qov.au](mailto:GLNG@ncc.qov.au)

Dear Sirs

**RE: APPLICATION FOR 15 YEAR NO-COVERAGE DETERMINATION FOR  
GLNG OPERATIONS PTY LIMITED (ON BEHALF OF THE PARTICIPANTS) – GLNG  
PIPELINE**

I refer to the application dated 12 March 2013 made by GLNG Operations Pty Limited (**GLNG**) under the National Gas Law for a 15 year no-coverage determination for the proposed GLNG pipeline (**GLNG Application**).

Tri-Star Petroleum Company ARBN 050 415 739, together with its related corporation Tri-Star Australia Holding Company ARBN 109 075 078, (**Tri-Star**) opposes the GLNG Application for the reasons set out in this letter.

Tri-Star is a group of coal seam gas (CSG) exploration companies with long standing and experience in the CSG exploration and development industry in Queensland. The Tri-Star companies have been at the forefront of CSG exploration and development in Queensland, including the exploration for, appraisal and development of the Fairview CSG field (currently operated by Santos Ltd), the Spring Gully field and Durham Ranch field (currently operated by APLNG or an affiliate).

Along with Santos Limited, a participant in GLNG, Tri-Star is jointly venturing for the production of CSG from interests in a number of current and prospective gas fields in Central Queensland, and holds both current working interests and post-reversion interests in those fields and the associated joint venture operations.

Access to a pipeline to markets for Tri-Star gas is critical to the proper economic development of the Tri-Star CSG interests, as it is for all joint venture participants, and the approval of the GLNG Application is likely to put further at risk the economic development of those interests for currently available markets or may result in the CSG being reserved exclusively for GLNG's use or acquisition on uncompetitive terms favourable to GLNG.

## ❖ Application

Tri-Star adopts and relies upon the statements set out in its prior submissions dated 25 May 2012 in response to the APLNG Pipeline application for a 15 year no-coverage determination for the proposed APLNG Pipeline.

## ❖ Summary of Criteria

We address each of the four coverage criteria in summary as set out below.

### 1. Criterion (a) - Promotion of competition

1. Access to GLNG's pipeline will promote a material increase in competition in either upstream or downstream markets, including the market for export of CSG as LNG. Tri-Star submits that access for CSG to downstream LNG projects is wholly dependent on access to the market pipelines from upstream integrated projects, and that no access to downstream LNG offtake markets is currently available, or projected to be available, in the absence of access to the QGC, APLNG or GLNG Pipelines. Of these pipelines, only the GLNG Pipeline remains accessible pending the Council's determination of GLNG's present coverage application.

### 2. Criterion (b) - Uneconomic to duplicate

- a. It is not economically feasible for others in the market place for CSG to LNG export, such as the QCLNG Project and the APLNG Project, to develop alternative accessible pipelines as these projects have been granted the benefit of 15 year no coverage determinations.
- b. The GLNG pipeline will have sufficient capacity to satisfy the reasonably foreseeable demand for CSG pipeline services and it is therefore not economic for another entity to build another pipeline.

### 3. Criterion (c) - No undue risk to human health or safety

- a. Tri-Star is unable to comment on undue risk to health and safety.

### 4. Criterion (d) - Not contrary to public interest

- b. Access to the GLNG pipeline would be in the public interest because access with or without compression would not derogate from positive realizations flowing from the project.

Tri-Star trusts this information is of assistance to the Council. Tri-Star looks forward to discussing our submissions with you once you have had the opportunity to review them in due course.

Yours Sincerely



**John Sweep**

**General Counsel  
For TRI-STAR PETROLEUM COMPANY**