



AUSTRALIAN PETROLEUM PRODUCTION & EXPLORATION  
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14 February 2008

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Ms Clare Walsh  
The Greenhouse and Energy Reporting Task Force  
Department of Climate Change  
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Dear Ms Walsh

INTERNET  
[www.appea.com.au](http://www.appea.com.au)

**RE: NATIONAL GREENHOUSE AND ENERGY REPORTING SYSTEM  
TECHNICAL GUIDELINES FOR THE ESTIMATION OF GREENHOUSE  
EMISSIONS AND ENERGY AT FACILITY LEVEL ENERGY, INDUSTRIAL  
PROCESS AND WASTE SECTORS IN AUSTRALIA DISCUSSION PAPER:  
APPEA COMMENTS**

EMAIL  
[appea@appea.com.au](mailto:appea@appea.com.au)

I refer to the above discussion paper, released on 13 January 2008 for comment by 13 February 2008. The Australian Petroleum Production & Exploration Association (APPEA) welcomes the opportunity to provide comment on this paper.

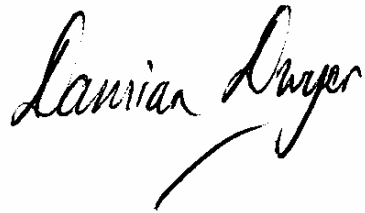
APPEA is the peak national body representing the Australian upstream oil and gas industry. APPEA member companies collectively produce around 98 per cent of Australia's oil and gas. APPEA has been an active participant in the greenhouse debate in Australia for well over a decade.

APPEA's attached comments are designed to ensure the technical guidelines supporting the Act and the associated regulations achieve their stated objectives in a way that involves the least compliance cost for industry and other reporters. Our comments are particularly focussed on ensuring the technical guidelines assist in achieving a more efficient and effective reporting framework in Australia.

A number of APPEA member companies have also made submissions on the discussion paper and APPEA would refer you to those submissions for further upstream oil and gas industry comment.

We would be pleased to discuss these comments with you at any stage. Should you have any queries, please feel free to contact me via telephone on 6267 0902 or via e-mail at [ddwyer@appea.com.au](mailto:ddwyer@appea.com.au).

Yours sincerely

A handwritten signature in black ink that reads "Damian Dwyer". The signature is written in a cursive style with a long, sweeping underline that extends to the left.

**DAMIAN DWYER**  
Director, Economic and Trade

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