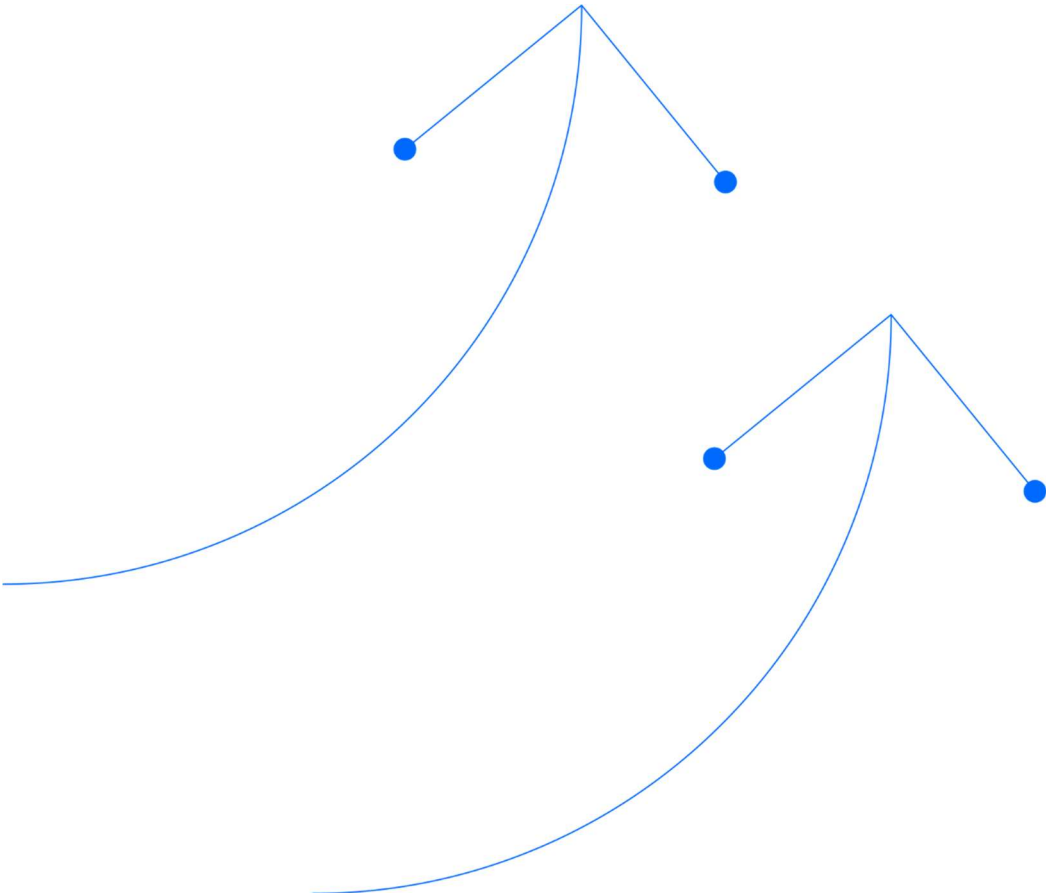


ANNUAL ENVIRONMENTAL PERFORMANCE REPORT 2025

EP 125 Jacko Bore 1DW1 Drill and Test Program STO5-5



Document Title	Annual Environmental Performance Report 2025 EP 125 Jacko Bore 1DW1 Drill and Test Program
Environmental Management Plan covered	EP 125 Jacko Bore 1DW1 Drill and Test Program (STO5-5) (Ref: NTEPA2023/0024-006~0004)
Permit	EP 125
Interest Holder Details	Santos QNT Pty, 60 Flinders Street, Adelaide South Australia 5000 GPO Box 2455, Adelaide South Australia 5001 ABN 33 083 077 96 Tamboran Resources Ltd, 110-112 The Corso, Manly NSW 2095 ABN 28 135 299 062
Operator Details	Santos QNT Pty, 60 Flinders Street, Adelaide South Australia 5000 GPO Box 2455, Adelaide South Australia 5001 ABN 33 083 077 96
Approved by	Santos QNT Pty
Date Approved	01 October 2025


Signature and Certification	
I/We hereby declare that the information provided in this annual environment performance report and accompanying documents is to the best of my/our knowledge, true and correct.	
Asset / Project Approval	
Signature	
Name (print)	David Gornall
Position	Manager Environment Eastern Australia and Papua New Guinea
Date	01 October 2025

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Abbreviations and Units

Acronym / Abbreviation	Description
AEPR	Annual Environmental Performance Report
ALARP	As low as reasonably practicable
Code	Code of Practice
DEPWS	Department of Environment, Parks and Water Security (now Department of Lands, Planning & Environment (DLPE))
DITT	Department of Industry, Tourism and Trade
DLPE	Department of Lands, Planning & Environment
EMP	Environmental Management Plan
EP	Exploration Permit
NT	Northern Territory
NT EPA	Northern Territory Environmental Protection Authority
Regulations	Petroleum (Environment) Regulations 2016
SMS	Santos Management System
SSCC	Sacred Site Clearance Certificate

1. Introduction

The *Petroleum (Environment) Regulations 2016* (PER) include a requirement for the interest holder to provide a report to the Minister on an annual basis that outlines the environmental performance of the interest holder (the Annual Environment Performance Report). The report must include sufficient information to allow the Minister to assess whether the interest holder has met the environmental outcomes and environmental performance standards included in the approved Environment Management Plan (EMP). The report is to consider information required to be recorded, monitored or reported under the PER and any other law in force in the Northern Territory related to conduct of the regulated activity.

This Annual Environmental Performance Report (AEPR) applies to the EP 125 Jacko Bore 1DW1 Drill and Test Program that was approved on 21 August 2024 (Figure 1). The period covered by this AEPR is from 1 July 2024 to 30 June 2025.

1.1. Background

Santos QNT Pty Ltd (Santos) submitted *STO5-5: EP 125 Jacko Bore 1DW1 Drill and Test Program Environment Management Plan, dated 28 June 2024* (EMP 2024) under the PER that came into force 6 July 2016. EMP 2024 was submitted to cover the following scope:

- The re-establishment of the previously cleared well pad and campsite.
- Civil construction associated with the expansion of the existing well site and associated infrastructure (laydown yard, overburden spoil stockpile, tank pads, fire breaks, effluent irrigation area, access tracks and water bores).
- Drilling, completion, monitoring and maintenance, and suspension and decommissioning of a horizontal helium appraisal well.
- Extended production testing of a horizontal helium appraisal well for a period of up to 365 days.
- Rehabilitation of area utilised for the Activity and previously disturbed areas associated with the Interest Holder's exploration and appraisal activities.
- The use and maintenance of public roads, existing access tracks and pre-existing gravel pits along the access track to the well pad.

No modifications to the regulated activity within the EMP have been proposed.

Status of works:

- EMP 2024 was approved on 21 August 2024.
- This AEPR has been prepared to report on activities that have occurred under EMP 2024 between 1 July 2024 and 30 June 2025.
- Regulated activities are yet to commence under this EMP.

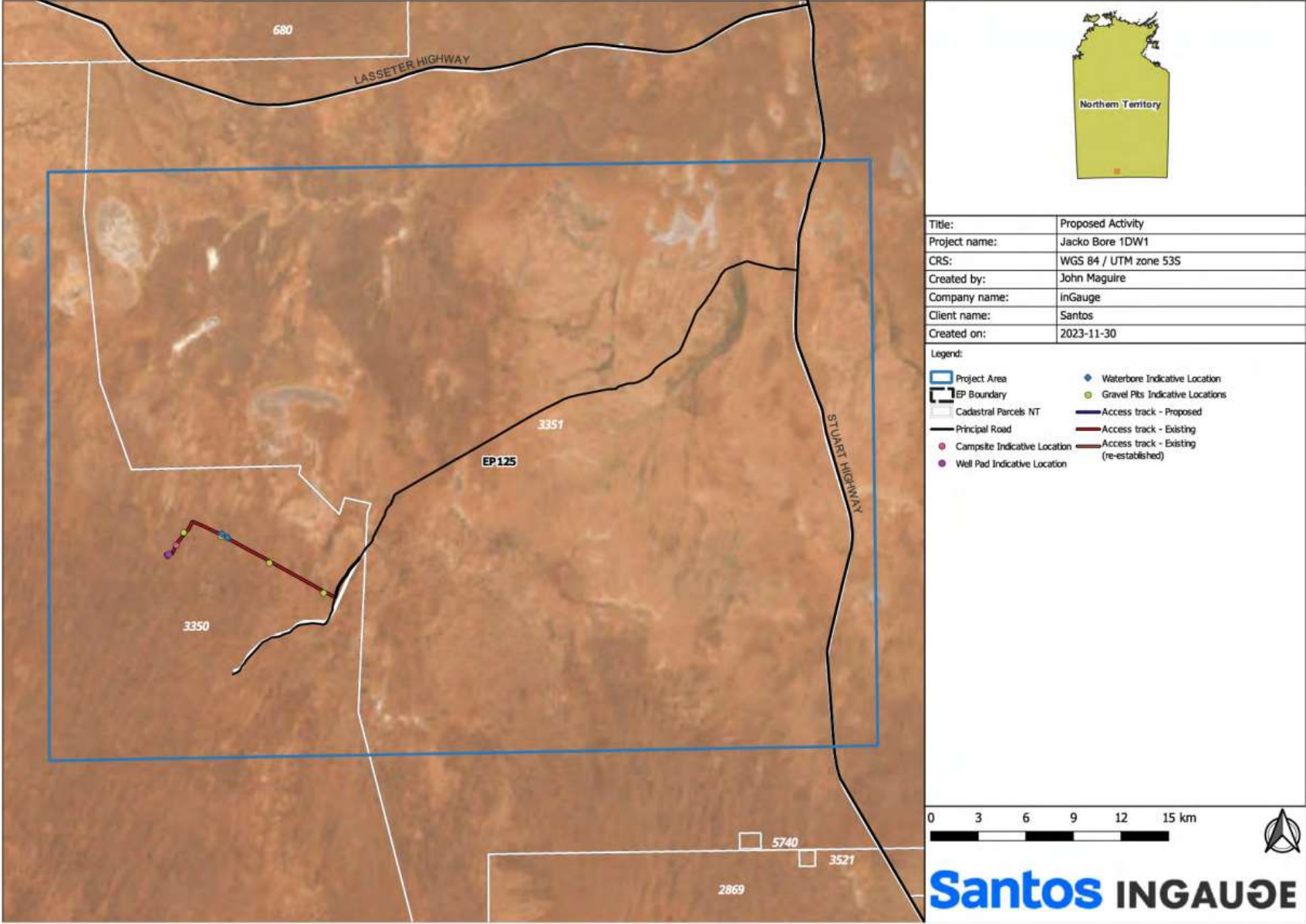


Figure 1 EP 125 Jacko Bore 1DW1 Drill and Test Program Location

1.2. Contents of Performance Report

This AEPR describes the environmental performance of Santos by evaluation of the following:

- Compliance with Ministerial approval conditions for each EMP.
- Compliance with each environmental outcome and environmental performance standard within the EMP 2024.
- Compliance with reporting requirements in accordance with the Code and Regulations.
- All recordable and reportable incidents, including root cause analysis and related corrective actions to prevent re-occurrence.
- Findings of all regulatory inspections and audits and related actions to address any findings.

1.3. Assessment of Compliance

Table 1 shows the compliance status indicators used in this AEPR.

Table 1: Compliance descriptors

Indicator	Description
Compliant	Compliant with requirement for the reporting period
Not Compliant	Not compliant with the requirement during the reporting period
Not Applicable	Requirement not applicable during the reporting period

1.4. Evidence of Compliance

- The following sources of evidence are used to demonstrate compliance:
- Internal monitoring of compliance by Santos through internal audits of compliance and reporting including incident reporting.
- Outcomes from regulator inspections conducted by the Department of Lands, Planning & Environment (DLPE) (Petroleum Operations Branch).
- Recordable and reportable incident reports submitted to DLPE Petroleum Operations.
- Reports provided to DLPE, the Department of Industry Tourism and Trade (DITT) and other government agencies.

2. Demonstration of Compliance

Table 2 demonstrates Santos's compliance with Ministerial EMP approval conditions.

Table 2: Compliance with ministerial EMP approval conditions between 1 July 2024 and 30 June 2025.

Item No.	Ministerial Condition	Compliance Status	Evidence
1.	By 1 September of each year, the interest holder must submit to Onshoregas.DEPWS@nt.gov.au a notification if civil works (being all ground disturbing activities, including earth moving, land clearing, installation of gravel pits, establishment of well pads, and establishment of access tracks) are proposed to be conducted during the upcoming Wet Season (as defined in the Code of Practice: Onshore Petroleum Activities in the Northern Territory (2019) (the Code)). The notification must include:	<i>Not Applicable</i>	No regulated activities including civil works were undertaken during the wet season.
	i. the nature of the proposed civil works activities; and		
	ii. the proposed timeframe for conducting the civil works activities.	<i>Not Applicable</i>	No regulated activities including civil works were undertaken during the wet season.
2.	Within 24 hours of commencing or stopping civil works activities (being all ground disturbing activities, including earth moving, land clearing, installation of gravel pits, establishment of well pads, and establishment of access tracks), the interest holder must submit to Onshoregas.DEPWS@nt.gov.au a notification that civil works activities have commenced or ceased, including the date the activities commenced or ceased and the type and location of the activities.	<i>Not Applicable</i>	No regulated activities including civil works were undertaken during the reporting year.
3.	Within 24 hours of drilling activities commencing or stopping, the interest holder must submit to Onshoregas.DEPWS@nt.gov.au a notification that drilling activities have commenced or stopped, including the location of the relevant drilling activity.	<i>Not Applicable</i>	No regulated activities including drilling were undertaken during the reporting year.
4.	Within 30 days of each occasion a groundwater bore is installed, or within 30 days of determining an existing groundwater bore is proposed to be used, the interest holder must send to Onshoregas.DEPWS@nt.gov.au:	<i>Not Applicable</i>	No regulated activities involving groundwater bore installation or groundwater extraction were undertaken during the reporting year.
	i. the registered number of the groundwater bore;		
	ii. the aquifer the groundwater bore is targeting;		
	iii. the purpose of the groundwater bore;	<i>Not Applicable</i>	No regulated activities involving groundwater bore installation or groundwater extraction were undertaken during the reporting year.

Item No.	Ministerial Condition	Compliance Status	Evidence
	iv. whether the bore is proposed to be included on an extraction licence and the proposed volume to be extracted per annum, or if already included on an extraction licence, the extraction licence number and date issued and the volume allowed for extraction per annum; and	<i>Not Applicable</i>	No regulated activities involving groundwater bore installation or groundwater extraction were undertaken during the reporting year.
	v. the GPS coordinates of the groundwater bore.	<i>Not Applicable</i>	No regulated activities involving groundwater bore installation or groundwater extraction were undertaken during the reporting year.
5.	By 1 October of each year, the interest holder must submit to Onshoregas.DEPWS@nt.gov.au a completed Annual Environmental Performance Report (AEPR) for the preceding 12 month period of 1 July to 30 June using the AEPR template. The AEPR Template must be completed in accordance with the Onshore Petroleum Annual Environmental Performance Reporting Guideline as updated from time to time.	<i>Compliant</i>	This Annual Environmental Performance Report.
6.	Within three business days of 31 March, 30 June, 30 September and 31 December of each year, the interest holder must submit to Onshoregas.DEPWS@nt.gov.au a report with the following information: i. regulated activities completed in the previous quarter;	<i>Compliant</i>	Quarterly reports were submitted to DLPE on the following dates: <ul style="list-style-type: none"> • Q3 2024: 3 October 2024 • Q4 2024: 6 January 2025 • Q1 2025: 3 April 2024 • Q2 2025: 2 July 2025 Quarterly reports detailed the regulated activities completed in the previous quarter. Note that no regulated activities were completed in the previous quarter for any quarterly report submissions.
	ii. regulated activities to be conducted in the next quarter, including estimated duration;	<i>Compliant</i>	Quarterly reports were submitted to DLPE on the following dates: <ul style="list-style-type: none"> • Q3 2024: 3 October 2024 • Q4 2024: 6 January 2025 • Q1 2025: 3 April 2024 • Q2 2025: 2 July 2025 Quarterly reports detailed the regulated activities to be conducted in the following quarter.
	iii. the date any conditions of this approval were completed in the previous quarter;	<i>Compliant</i>	Quarterly reports were submitted to DLPE on the following dates: <ul style="list-style-type: none"> • Q3 2024: 3 October 2024 • Q4 2024: 6 January 2025 • Q1 2025: 3 April 2024 • Q2 2025: 2 July 2025 Quarterly reports provided completion dates of approval conditions completed in the previous quarter.
	iv. the date any conditions of this approval are due for completion in the next quarter; and	<i>Compliant</i>	Quarterly reports were submitted to DLPE on the following dates: <ul style="list-style-type: none"> • Q3 2024: 3 October 2024 • Q4 2024: 6 January 2025 • Q1 2025: 3 April 2024

Item No.	Ministerial Condition	Compliance Status	Evidence
	v. monitoring and compliance activities to be conducted in the next quarter based on commitments in the approved EMP, relevant to the stage of a regulated activity.	<i>Compliant</i>	<ul style="list-style-type: none"> Q2 2025: 2 July 2025 Quarterly reports provided dates for conditions of approval due for completion in the following quarter. Quarterly reports were submitted to DLPE on the following dates: <ul style="list-style-type: none"> Q3 2024: 3 October 2024 Q4 2024: 6 January 2025 Q1 2025: 3 April 2024 Q2 2025: 2 July 2025 Quarterly reports detailed monitoring and compliance activities to be conducted in the following quarter.
7.	During the Wet Season (as defined in the Code), the interest holder must submit to Onshoregas.DEPWS@nt.gov.au weekly reports with the following information: i. whether unsealed access roads were used by any vehicle or machinery, other than a light vehicle;	<i>Compliant</i>	In reference to email correspondence with the Department on 19 December 2024, it is noted that the Department will not undertake compliance action if no weekly nil reports were submitted during 2024-2025 wet season. No regulated activities were undertaken during the wet season, however Santos provided weekly reports to the Department between 8 October 2024 and 17 March 2025.
	ii. daily inspection reports of erosion and sediment control measures and, where relevant, the type and date of corrective actions taken, or date proposed to be taken, in response to issues identified in the daily inspection reports;	<i>Compliant</i>	In reference to email correspondence with the Department on 19 December 2024, it is noted that the Department will not undertake compliance action if no weekly nil reports were submitted during 2024-2025 wet season. No regulated activities were undertaken during the wet season, however Santos provided weekly reports to the Department between 8 October 2024 and 17 March 2025.
	iii. daily inspection reports for secondary containment in use and, where relevant, the type and date of corrective actions taken, or date proposed to be taken, in response to issues identified in the daily inspection reports; and	<i>Compliant</i>	In reference to email correspondence with the Department on 19 December 2024, it is noted that the Department will not undertake compliance action if no weekly nil reports were submitted during 2024-2025 wet season. No regulated activities were undertaken during the wet season, however Santos provided weekly reports to the Department between 8 October 2024 and 17 March 2025.
	iv. all dates the regulated activity was stopped due to Wet Season events and the date and time that the regulated activity recommenced, or is proposed to recommence.	<i>Compliant</i>	In reference to email correspondence with the Department on 19 December 2024, it is noted that the Department will not undertake compliance action if no weekly nil reports were submitted during 2024-2025 wet season. No regulated activities were undertaken during the wet season, however Santos provided weekly reports to the Department between 8 October 2024 and 17 March 2025.
8.	During drilling activities, the interest holder must record the date, time and position title of the officer who conducted the daily inspection, and must submit to Onshoregas.DEPWS@nt.gov.au a weekly report with the following information: i. the daily freeboard available in drill cutting pits (in cm) and the time of measurement; and	<i>Not Applicable</i>	No regulated activities involving drilling were undertaken during the reporting year.

Item No.	Ministerial Condition	Compliance Status	Evidence
	ii. whether any non-compliances with legal requirements were identified in the daily inspections and, if relevant, corrective actions taken, or proposed to be taken, and the timeframe for implementation of corrective actions, in response to the non-compliances.	<i>Not Applicable</i>	No regulated activities involving drilling were undertaken during the reporting year.
9.	The interest holder must submit the weekly reports required by conditions 7 and 8 by 5pm ACST each Monday for the preceding week or part thereof.	Compliant	In reference to email correspondence with the Department on 19 December 2024, it is noted that the Department will not undertake compliance action if no weekly nil reports were submitted during 2024-2025 wet season. No regulated activities were undertaken during the wet season, however Santos provided weekly reports to the Department between 8 October 2024 and 17 March 2025.
10.	The interest holder must submit recordable incident reports to Onshoregas.depws@nt.gov.au no later 5 pm ACST 15 days after the end of each quarter, being 15 April, 15 July, 15 October and 15 January each year while the approved plan remains in force, and must be submitted regardless of whether an incident occurred during the reporting period or not.	Compliant	Quarterly reports were submitted to DLPE on the following dates: <ul style="list-style-type: none"> • Q3 2024: 15 October 2024 • Q4 2024: 15 January 2025 • Q1 2025: 15 April 2025 • Q2 2025: 15 July 2025 No recordable incidents occurred during the reporting period.
11.	Within 30 days of completing land clearing or other ground disturbing activities (being all ground disturbing activities, including earth moving, land clearing, installation of gravel pits, establishment of well pads, and establishment of access tracks), the interest holder must submit to Onshoregas.DEPWS@nt.gov.au geospatial files (as shapefiles and inclusive of metadata).	<i>Not Applicable</i>	No regulated activities involving ground disturbance were undertaken during the reporting year.
12.	By 31 October of each year, the interest holder must submit to Onshoregas.DEPWS@nt.gov.au the emissions report required by clause D.6.2 of the Code, which must: i. calculate emissions in accordance with the National Greenhouse and Energy Reporting (Measurement) Determination 2008;	<i>Not Applicable</i>	As detailed in email correspondence from the Department on 8 October 2024, as no regulated activity had occurred, Santos is not required to provide an emissions report as required under Condition 9 for the period of 2023-2024. The next emissions report that is required to be submitted under this condition will be required to be submitted by 31 October 2025 for the reporting period of 1 July 2024 – 30 June 2025.
	ii. document actual annual greenhouse gas emissions from conduct of the regulated activity estimated and reported under the Commonwealth National Greenhouse and Energy Reporting Act 2007 (NGER Act);	<i>Not Applicable</i>	As detailed in email correspondence from the Department on 8 October 2024, as no regulated activity had occurred, Santos is not required to provide an emissions report as required under Condition 9 for the period of 2023-2024. The next emissions report that is required to be submitted under this condition will be required to be submitted by 31 October 2025 for the reporting period of 1 July 2024 – 30 June 2025.

Item No.	Ministerial Condition	Compliance Status	Evidence
	iii. demonstrate the actual emissions have been verified by an auditor registered under the Register of Greenhouse and Energy Auditors established under section 75A of the NGER Act;	<i>Not Applicable</i>	As detailed in email correspondence from the Department on 8 October 2024, as no regulated activity had occurred, Santos is not required to provide an emissions report as required under Condition 9 for the period of 2023-2024. The next emissions report that is required to be submitted under this condition will be required to be submitted by 31 October 2025 for the reporting period of 1 July 2024 – 30 June 2025.
	iv. include a summary of all regulated activities conducted which have contributed to greenhouse gas emissions during the reporting period; and	<i>Not Applicable</i>	As detailed in email correspondence from the Department on 8 October 2024, as no regulated activity had occurred, Santos is not required to provide an emissions report as required under Condition 9 for the period of 2023-2024. The next emissions report that is required to be submitted under this condition will be required to be submitted by 31 October 2025 for the reporting period of 1 July 2024 – 30 June 2025.
	v. account for differences between actual and predicted emissions with reference to all parts of the regulated activity with potential to create greenhouse gas emissions.	<i>Not Applicable</i>	As detailed in email correspondence from the Department on 8 October 2024, as no regulated activity had occurred, Santos is not required to provide an emissions report as required under Condition 9 for the period of 2023-2024. The next emissions report that is required to be submitted under this condition will be required to be submitted by 31 October 2025 for the reporting period of 1 July 2024 – 30 June 2025.
13.	The interest holder must record all accidental releases of liquid contaminant or hazardous chemicals in a site spill register, which records: i. the liquid contaminant or hazardous chemical spilled or leaked;	<i>Not Applicable</i>	During completion of regulated activities, a site spill register will be maintained in accordance with the Spill Management Plan (Appendix 07 of approved EMP). As no regulated activities were undertaken during the reporting period, no accidental releases of liquid contaminants or hazardous chemicals occurred.
	ii. the GPS co-ordinates of the location of the spill or leak;	<i>Not Applicable</i>	During completion of regulated activities, a site spill register will be maintained in accordance with the Spill Management Plan (Appendix 07 of approved EMP). As no regulated activities were undertaken during the reporting period, no accidental releases of liquid contaminants or hazardous chemicals occurred.
	iii. the source and volume of the spill or leak;	<i>Not Applicable</i>	During completion of regulated activities, a site spill register will be maintained in accordance with the Spill Management Plan (Appendix 07 of approved EMP). As no regulated activities were undertaken during the reporting period, no accidental releases of liquid contaminants or hazardous chemicals occurred.
	iv. the volume of impacted soil removed for disposal and the depth of any associated excavation; and	<i>Not Applicable</i>	During completion of regulated activities, a site spill register will be maintained in accordance with the Spill Management Plan

Item No.	Ministerial Condition	Compliance Status	Evidence
	v. the volume of impacted soil removed for disposal and the depth of any associated excavation.	<i>Not Applicable</i>	(Appendix 07 of approved EMP). As no regulated activities were undertaken during the reporting period, no accidental releases of liquid contaminants or hazardous chemicals occurred. During completion of regulated activities, a site spill register will be maintained in accordance with the Spill Management Plan (Appendix 07 of approved EMP). As no regulated activities were undertaken during the reporting period, no accidental releases of liquid contaminants or hazardous chemicals occurred.
14.	The interest holder must undertake six-monthly testing of the quality of wastewater produced from this petroleum well, consistent with clause C.5.5(c) of the Code of Practice: Onshore Petroleum Activities in the Northern Territory (2019) (the Code).	<i>Not Applicable</i>	As detailed in email correspondence from the Department on 8 October 2024, this condition does not apply until a well is drilled. No regulated activities involving drilling were undertaken during the reporting year.
15.	The interest holder must provide a report consistent with the requirements of regulation 37B(2) to Onshoregas.depws@nt.gov.au within 90 days of the second testing event referred to in condition 14, inclusive of a full human health risk assessment, in accordance with regulations 37B(2A) and 4A.	<i>Not Applicable</i>	As detailed in email correspondence from the Department on 8 October 2024, this condition does not apply until a well is drilled. No regulated activities involving drilling were undertaken during the reporting year.
16.	The interest holder must review the results of testing undertaken in condition 14 to ensure: i. the wastewater and spill management practices in the EMP remain appropriate for the concentrations of analytes detected;	<i>Not Applicable</i>	No regulated activities involving drilling were undertaken during the reporting year.
	ii. the storage, treatment and transport of wastewater remain consistent with legislated requirements for NORMs and listed waste; and	<i>Not Applicable</i>	No regulated activities involving drilling were undertaken during the reporting year.
	iii. the human health risk assessment undertaken in accordance with condition 15 remains applicable to the type and concentrations of analytes detected.	<i>Not Applicable</i>	No regulated activities involving drilling were undertaken during the reporting year.

Table 3 provides a systematic overview of Santos’s compliance with the environmental outcomes and environmental performance standards within the approved EMP.

Table 3: Compliance with Environmental Outcomes and Environmental Performance Standards

Environmental Outcome	Environmental Performance Standard	Measurement Criteria	Compliance Status	Evidence
No unnecessary greenhouse gas emissions generated from the Activity.	Venting of gas during production testing occurs only when flaring is not possible due to fire, safety, or operational reasons.	Management of change records demonstrate the rationale for venting if flaring is not possible.	<i>Not Applicable</i>	No production testing, venting or flaring occurred during the reporting period.
	No uncontrolled leaks from the well head.	Records of well head inspections every six months until the well is decommissioned to demonstrate that there are no leaks and/or identified leaks are managed.	<i>Not Applicable</i>	No well heads were constructed during the reporting period.
No significant negative impact on community.	Spills during operations do not result in serious environmental harm.	Records of Santos Road Status Reports conducted prior to the transport of chemicals or wastewater on unsealed roads in the Project Area in the wet season demonstrate that the risk of spills during transport has been reduced to ALARP. Quarterly inspection checklists, completed during operations, show spill kits are available. Quarterly inspection checklists demonstrate that the Contingency Plan (Emergency Response) Plan Appendix 13 and Spill Management Plan Appendix 07 are available for an immediate coordinated response to a bogged vehicle or spill scenario during operations.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP. No chemicals or wastewater has been transported on unsealed roads. When regulated activities commence, measures outlined in the Contingency (Emergency Response) Plan and Spill Management Plan will be implemented and compliance will be confirmed through quarterly inspection checklists.
	Site access and speed limits are clear for visitors and workers.	Site induction records show that speed limits and approved access points are covered for visitors and workers travelling to site.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.
	No unresolved complaints related to noise or light pollution during operations.	Records of complaints received demonstrate follow-up on the complaint has occurred or is ongoing.	<i>Compliant</i>	Regulated activities have not yet commenced under this EMP; as such, no complaints have been received within the reporting year.

Environmental Outcome	Environmental Performance Standard	Measurement Criteria	Compliance Status	Evidence
	No unmanaged biosecurity risk from declared and priority weeds within cleared footprint.	A register of biosecurity/weed hygiene inspections demonstrates vehicles have weed certificates before entering the well pad. Records of annual weed surveys demonstrate that the work area is free of weeds, or that identified weeds are being managed/controlled.	<i>Not Applicable</i>	Construction of the well pad has not yet commenced and no vehicles have been commissioned on site. An annual weed survey was conducted on 31 July 2025 and provided to the Department on 15 September 2025.
	No bushfires from conduct of the Activity on the well pad.	Fire break inspection and maintenance records demonstrate that fire breaks are checked and cleared of fire-risk material until progressive rehabilitation commences.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.
No significant impact on indigenous and non-indigenous artefacts, sacred or heritage sites.	No unauthorised disturbance to Aboriginal or Macassan archaeological places or objects, sacred sites, cultural heritage sites or non-indigenous cultural heritage sites by the Activity.	Induction records, or toolbox talks, show that civils construction personnel have received training on where the limits of civils earthworks can occur within the construction buffer, demonstrating that works will not breach an AAPA Authority Certificate approved work area. The incident register shows that Aboriginal or Macassan archaeological places or objects or cultural heritage sites, if discovered during construction, are recorded and reported to the CEO of the Northern Territory Heritage Office - as soon as practical after discovery. The Historical Heritage Assessment report demonstrates that the proposed work area of Activity has been scouted for areas of cultural heritage and that any areas identified can be avoided.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.
No significant long-term impact on soil stability, quality, or surface water.	No uncontrolled or unremediated sediment releases from constructed tracks and well pad during operations.	Monitoring records of ESC measures demonstrate the ESC measures are operating as per the ESCP (Appendix 05) and that maintenance work is occurring where required.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.
	No over-topping of produced fluids from above-ground tanks.	Monitoring records demonstrate that the minimum operational freeboard is being maintained. Spill register demonstrates that no spills occurred from overtopping events.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.

Environmental Outcome	Environmental Performance Standard	Measurement Criteria	Compliance Status	Evidence
	No leaks of produced fluids that cause serious environmental harm to the sub-soil.	Inspection records of tanks, when containing fluids, include integrity checks demonstrating that tanks are in a suitable condition when in use. The incident register shows that any fluid identified between liners is recorded, investigated, and actioned, demonstrating active management and monitoring to prevent leaks to ground.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.
	No over-topping of drilling by-products from storage pit/s.	Monitoring records show that the minimum operational freeboard is being maintained. Spill register demonstrates no spills occurred from overtopping events.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.
	No leaks of drilling by-products that cause significant environmental harm to sub-soils from storage pit/s.	Monitoring records demonstrate that fluid level changes are consistent with operational Activity, and no wet patches are observed near the pit. The incident register shows that identified leaks are remedied as soon as possible.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.
	No fluid additive, chemical, or fuel spills escape storage and handling areas during operations.	Inspection records of secondary containment, when in use, demonstrate that the integrity of containment/storage is maintained and repaired if found damaged.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.
	Spills do not result in serious environmental harm.	Records of Santos Road Status Reports being conducted prior to the transport of chemicals or wastewater on unsealed roads in the Project Area demonstrate that the risk of spills during transport has been reduced to ALARP. Quarterly inspection checklists, completed during operations, show spill kits are available. Quarterly inspection checklists demonstrate that the Contingency Plan (Emergency Response) Plan Appendix 13 and Spill Management Plan Appendix 07 are available for an immediate coordinated response to a bogged vehicle or spill scenario during operations.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.

Environmental Outcome	Environmental Performance Standard	Measurement Criteria	Compliance Status	Evidence
	No runoff of grey water and treated sewage effluent out of designated irrigation area.	Quarterly inspection checklists demonstrate irrigation is by use of dispersion hoses and/or sprinklers to prevent pooling within a fenced, vegetated area on a slope <5%.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.
	Progressive rehabilitation of significantly disturbed areas commenced within 12 months of cessation of the Activity.	Rehabilitation records show that progressive rehabilitation of significantly disturbed areas commenced as soon as practicable and no later than 12 months after the cessation of the Activity.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.
No significant impact on groundwater quality or quantity.	No significant environmental harm to groundwater from the loss of circulation while drilling.	Drilling reports include details of all additives utilized when drilling through freshwater aquifers and demonstrate that they were not considered ecologically toxic.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.
	No significant environmental harm to groundwater from the loss of well control while drilling.	Training records demonstrate that well control training was carried out by those in control of drilling.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.
	No leaks of drilling by-products that cause significant environmental harm to sub-soils from storage pit/s.	Monitoring records demonstrate that fluid level changes are consistent with operational Activity, and no wet patches are observed near the pit. The incident register shows that identified leaks are remedied as soon as possible.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.
	No leaks of produced fluids that cause serious environmental harm to the sub-soil.	Inspection records of above-ground tanks, when containing fluids, include integrity checks demonstrating that tanks are in a suitable condition when in use. The incident register shows that any fluid identified between liners is recorded, investigated, and actioned, demonstrating active management, and monitoring to prevent leaks to ground.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.

Environmental Outcome	Environmental Performance Standard	Measurement Criteria	Compliance Status	Evidence
	Groundwater extraction limited to licenced volume.	Water extraction records available that demonstrate the volume extracted is less than the maximum permitted for the Activity.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.
No significant impact on threatened flora and fauna.	New disturbance assessed by an ecologist and sensitive areas avoided where practicable.	Field assessments and/or GPS logs demonstrate that on-ground scouting by an ecologist prior to any new clearing has occurred.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.
	No unmanaged biosecurity risk from declared and priority weeds within cleared footprint.	A register of biosecurity/weed hygiene inspections demonstrates vehicles have weed certificates before entering the well pad. Records of annual weed surveys demonstrate work area free of weeds, or that identified weeds are being managed/controlled.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.
	No bushfires from the conduct of the Activity on the well pad.	Fire break inspection and maintenance records demonstrate that fire breaks are checked and cleared of fire-risk material until progressive rehabilitation commences.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.

Table 4 demonstrates Santos’s compliance with reporting requirements in the *Code of Practice: Onshore Petroleum Activities in the Northern Territory (Code of Practice)* and the *Petroleum (Environment) Regulations 2016 (NT)*.

Table 4: Compliance with mandatory reporting requirements for Code of Practice and Petroleum (Environment) Regulations 2016.

Item No.	Reference	Requirement	Compliance Status	Evidence
1.	Code cl A.3.5	Geospatial information depicting areas cleared is to be provided to the Minister.	<i>Compliant</i>	Shapefiles containing the proposed extents of access tracks, gravel pits, water bores, camps and well pads were supplied to Onshoregas.DLPE@nt.gov.au as part of the EMP submission on 28 June 2024. Regulated activities are yet to commence under this EMP. Finalised clearing extents will be provided to the Minister once they have been confirmed.
2.	Code cl A.3.6 (b)	Weed management plan developed as part of the EMP must provide for ongoing weed monitoring.	<i>Compliant</i>	Weed Management plan developed and attached to the EMP was endorsed by DLPE (Appendix 09 of approved EMP) contains monitoring requirements.
3.	Code cl A.3.7(a)vi	The fire management plan developed as part of the EMP must provide for annual fire mapping to monitor changes to fire frequency in the relevant areas.	<i>Compliant</i>	The fire management plan (Appendix 08 of approved EMP) makes provision for this requirement of the Code. There were no fires in and around the project footprint during the reporting period.
4.	Code cl A.3.9(c) Code cl A.3.9(e)	The rehabilitation plan developed as part of the EMP requires progressive rehabilitation of significantly disturbed land which is required to commence no longer than 12 months following the cessation of activities on the land. It also requires regular maintenance and annual monitoring of rehabilitated areas.	<i>Compliant</i>	The Rehabilitation Management Plan (section 7.4 of approved EMP) makes provision for this requirement of the code. No rehabilitation activities were conducted during the 2024-2025 reporting period.
5.	Code cl B.4.13.2(c)	As a minimum, the following must be recorded and reported for each stage (where a stage in this context means all fluids pumped at a particular depth interval): a) total volume of hydraulic fracturing fluid pumped, b) quality of water used (tested for analytes in section C.8 of this Code. Analyses do not need to be repeated if the same water source is used for multiple stages) and c) typical and maximum concentrations of chemicals or other substances used.	<i>Not Applicable</i>	Code cl B.4.13.2 relates to hydraulic fracture stimulation. Activities conducted under this EMP did not include hydraulic fracture stimulation.

Item No.	Reference	Requirement	Compliance Status	Evidence
6.	Code cl B.4.13.2(k)iv	Where venting is the only technically feasible option for managing produced gas, the technical considerations preventing the use of the recovered gas must be recorded and included in the operator's annual report.	<i>Not Applicable</i>	Code cl B.4.13.2(k)iv relates to stimulation and well testing, activities undertaken under this EMP did not include stimulation or well testing.
7.	Code cl B.4.14.2(c)	All new barriers or new well operating envelopes must be verified and clearly documented and reported by submission of an updated well barrier integrity validation (WBIV) report to DPIR.	<i>Not Applicable</i>	No relevant regulated activities were undertaken during the reporting period.
8.	Code cl B.4.15.2(j)	Complete and accurate records of the entire decommissioning procedure must be kept, with these records submitted as part of the legislative reporting requirements for the decommissioning of petroleum wells.	<i>Not Applicable</i>	The regulated activity conducted during the reporting period did not include any aspects of decommissioning for the reporting period.
9.	Code cl B.4.17.2(d)	Any guidelines published by the Northern Territory Government from time to time relating to reporting and data submission, and groundwater monitoring data standards must be followed.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP. No groundwater interaction or extraction has occurred.
10.	Code cl C.3(eC)	The components of the wastewater management framework, include; Monitor, manage and report in accordance with the Wastewater Management Plan and Spill Management Plan.	Compliant	The wastewater management plan (Appendix 6 of approved EMP) and spill management plan (Appendix 7 of approved EMP) makes provision for this requirement of the code.
11.	Code cl C.6.1(d)	Wastewater tracking documentation must be reported to the Minister at least annually in accordance with the framework (Spill Management Plan and Wastewater Management Plan) outlined in the EMP	<i>Not Applicable</i>	No relevant regulated activities were undertaken during the reporting period.
12.	Code cl C.7.1(d)ii	Wastewater Management Plan must include a program for monitoring and reporting against the effectiveness of the measures for the mitigation of interaction with wildlife, stock and human receptors with wastewater.	Compliant	The wastewater management plan (Appendix 6 of approved EMP) makes provision for this requirement of the code.
13.	Code cl D.4.3.2(f)	A written report detailing the levels of methane measured, the duration of the unusual readings and the results of the investigation (including remedial actions) must be submitted within one month of the significantly higher-level methane event being detected.	<i>Not Applicable</i>	No relevant regulated activities were undertaken during the reporting period.
14.	Code cl D.5.9.2(c)	Emissions from exploration, well construction (including during flowback) and workovers must be measured and reports submitted.	<i>Not Applicable</i>	As detailed in email correspondence from the Department on 8 October 2024, as no regulated activity had occurred, Santos is not required to provide an emissions report as required under Condition 9 for the period of 2023-2024.

Item No.	Reference	Requirement	Compliance Status	Evidence
				The next emissions report that is required to be submitted under this condition will be required to be submitted by 31 October 2025 for the reporting period of 1 July 2024 – 30 June 2025.
15.	Code cl D.5.9.3(a)	Where natural gas is vented or flared at a gas processing or other downstream facility, emissions must be estimated and reported.	<i>Not Applicable</i>	No relevant regulated activities were undertaken during the reporting period.
16.	Code cl D.6.1	All mandated government reporting is complied with; and all detectable leaks and emissions are reported on an annual basis.	<i>Not Applicable</i>	As detailed in email correspondence from the Department on 8 October 2024, as no regulated activity had occurred, Santos is not required to provide an emissions report as required under Condition 9 for the period of 2023-2024. The next emissions report that is required to be submitted under this condition will be required to be submitted by 31 October 2025 for the reporting period of 1 July 2024 – 30 June 2025.
17.	Code cl D.6.2(a)	Reports of baseline assessments must be submitted at the conclusion of each field campaign.	<i>Compliant</i>	Baseline assessment reports have been submitted in the form of an ecological assessment and weed management plan appended to the approved EMP. It is noted that regulated activities have not yet commenced and field campaigns have not been conducted.
18.	Code cl D.6.2(b)	Emissions reporting must be in accordance with Section D.5.6. Emissions associated with venting and flaring as described in Section D.5.9 must be provided separately to the Northern Territory Government in accordance with this Code.	<i>Not Applicable</i>	As detailed in email correspondence from the Department on 8 October 2024, as no regulated activity had occurred, Santos is not required to provide an emissions report as required under Condition 9 for the period of 2023-2024. The next emissions report that is required to be submitted under this condition will be required to be submitted by 31 October 2025 for the reporting period of 1 July 2024 – 30 June 2025.
19.	Regulation 14	A current EMP remains in force until the interest holder notifies the Minister the activity is no longer being carried out and all of the environmental outcomes and obligations under the plan have been met, and the Minister advises the interest holder the notice is accepted and the plan ceases to be in force.	<i>Compliant</i>	The current EMP remains in force.
20.	Regulations Schedule 1, item 9(2)	Interest holders are required to conduct future engagement with stakeholders, in accordance with the description in the EMP.	<i>Compliant</i>	Stakeholders will continue to be engaged with in accordance with the stakeholder engagement log (Appendix 11 of approved EMP).

Item No.	Reference	Requirement	Compliance Status	Evidence
21.	Regulations Schedule 1, item 12	Interest holder must notify the Minister, occupier of the land and owner of the land on which the activity is to be carried out before commencement of activity.	<i>Not Applicable</i>	Regulated activities have not yet commenced under this EMP.
22.	EMP Section 8.8 Incident Reporting Regulation 33	DEPWS is notified of reportable incidents within 2 hours of the interest holder becoming aware of the incident, or within 2 hours of the incident occurring. A written report must be provided within 24 hours if the initial report was made orally.	<i>Not Applicable</i>	There were no reportable incidents during this period.
23.	EMP Section 8.8 Incident Reporting Regulation 34	Reports on reportable incidents are to be provided to DENR as soon as practicable and within 72 hours of the event occurring. A final report must be provided to DENR within 30 days after remediation/cleanup of the affected area.	<i>Not Applicable</i>	There were no reportable incidents during this period.
24.	EMP Section 8.8 Incident Reporting Regulation 35	A written report of all recordable incidents must be provided to DEPWS not later than 15 days after the 90 day reporting period (unless otherwise agreed).	<i>Not Applicable</i>	There were no reportable incidents during this period.
25.	Regulation 37A	A report about flowback fluid from hydraulic fracturing must be provided to the Minister within 6 months of the flowback occurring.	<i>Not Applicable</i>	No hydraulic fracturing was undertaken as part of this EMP.
26.	Regulation 37B	A report about produced water from hydraulic fracturing must be provided to the Minister within 6 months of the produced water being extracted.	<i>Not Applicable</i>	No hydraulic fracturing was undertaken as part of this EMP.
27.	Environment Protection Act 2019 (NT) div 8	Duty to notify the NT EPA as soon as practicable but within 24 hours of any incident which occurs which causes or threatens to cause material or significant environmental harm.	<i>Not Applicable</i>	No incidents which could cause or threaten to cause material or significant environmental harm occurred during reporting period.
28.	Waste Management and Pollution Control Act 1998 (NT) s14	Duty to notify the NT EPA as soon as practicable but within 24 hours of any incident which occurs which causes or threatens to cause pollution resulting in material or significant environmental harm.	<i>Not Applicable</i>	No incidents which could cause or threaten to cause material or significant environmental harm occurred during reporting period.

3. Summary of Compliance

3.1. Overview of Compliance

Table 5 provides a summary of the results of the compliance assessment against the 92 total compliance items.

Table 5: Compliance Summary

Compliance Indicator	Number	Percentage
Compliant	22	24%
Not Compliant	0	0%
Not Applicable	70	76%

3.2. Overview of items found Not Compliant

The following sections describe any compliance requirements not met during the reporting period.

3.2.1. Ministerial Approval Conditions

Not applicable: compliant with regulatory reporting standards.

3.2.2. Environmental Performance Standards

Not applicable: compliant with regulatory reporting standards.

3.2.3. Regulatory Reporting

Not applicable: compliant with regulatory reporting standards.