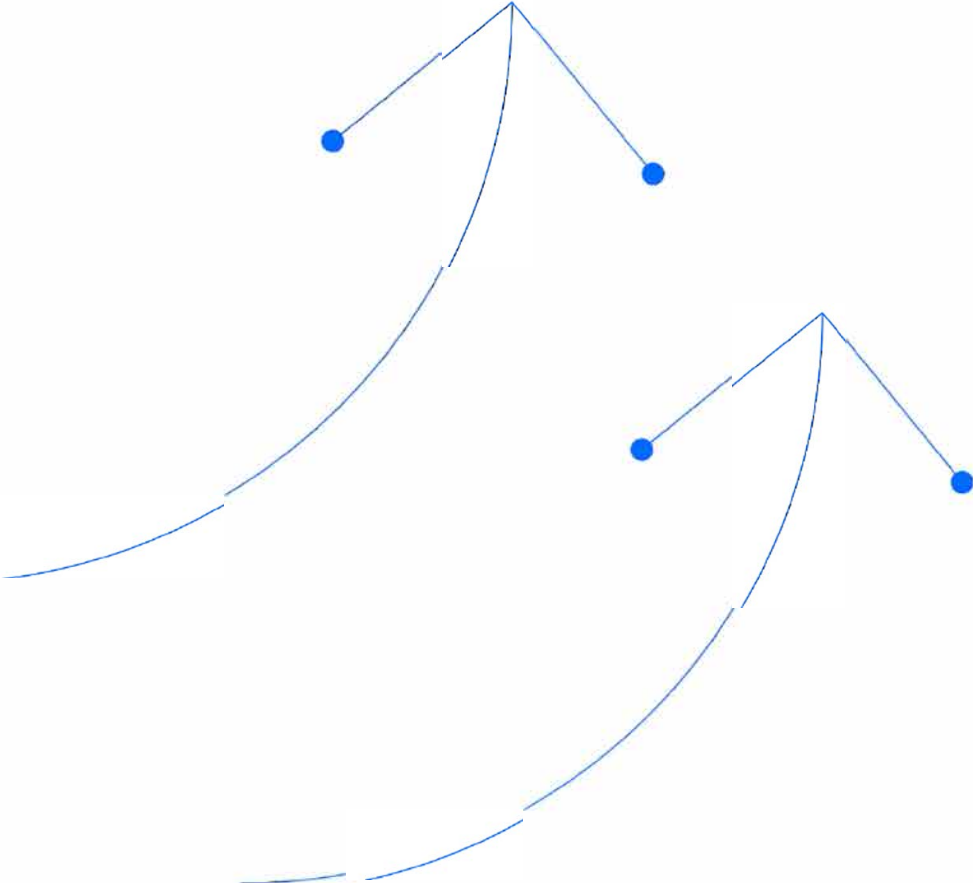


# ANNUAL ENVIRONMENTAL PERFORMANCE REPORT 2026

McArthur Basin Drilling Program EP 161



<b>Document Title</b>	<b>Annual Environmental Performance Report 2025</b> <b>McArthur Basin Drilling Program EP 161</b>
<b>Environmental Management Plan covered</b>	McArthur Basin Drilling Program (STO 2-7) (Ref: NTEPA2020/0116-007~0006)
<b>Permit</b>	EP 161
<b>Interest Holder Details</b>	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
<b>Operator Details</b>	Santos QNT Pty, 60 Flinders Street, Adelaide South Australia 5000 GPO Box 2455, Adelaide South Australia 5001 ABN 33 083 077 96
<b>Approved by</b>	Santos QNT Pty
<b>Date Approved</b>	20 May 2026

## 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)



Position



Date

20 May 2026

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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 (formerly Department of Environment, Parks and Water Security (DEPWS))
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 Environment Performance Report (AEPR) applies to the McArthur Basin Drilling Program that was approved on 21 February 2021 (Figure 1). The period covered by this AEPR is from 21 February 2025 to 20 February 2026.

## 1.1. Background

Santos QNT Pty Ltd (Santos) submitted the *McArthur Basin Drilling Program EP 161 EMP (STO2-7), Revision 5, September 2020* (EMP 2021) under the PER that came into force 6 July 2016. EMP 2021 was submitted to cover the following scope:

- Drilling of Inacumba 1 pilot well, Inacumba 1H horizontal well from the Inacumba 1 pilot well and Inacumba 2H well
- Drilling of Tanumbirini 2H well and Tanumbirini-3H well
- Evaluation of the wells
- Well integrity monitoring
- Suspension and/or plugging and decommissioning of the wells
- Rehabilitation of the wells

Under Regulation 22, four modifications to the regulated activity within the EMP have been approved:

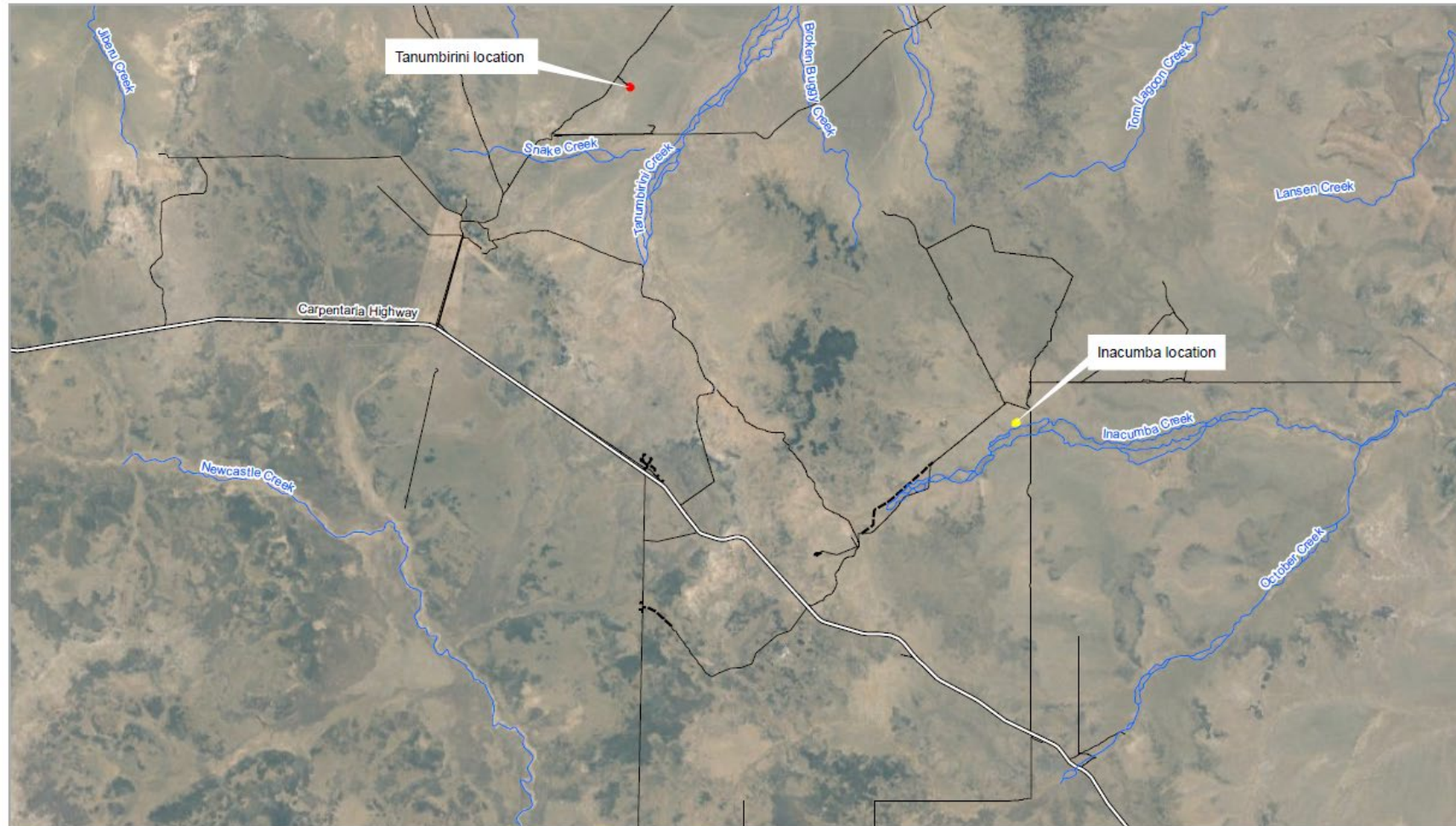
- Additional drilling chemicals during the activities (21 May 2021)
- Additional drilling chemicals during the activities (8 September 2021)
- Update to the lateral sections of horizontal wells at Tanumbirini (not be separated by 50mTVD) and are planned to target the same shale interval (16 September 2021)
- Inspection frequencies and remote monitoring methodologies (9 August 2024)

On 9 September 2024, Santos provided a response to the DEPWS request for information regarding the management of residual drilling material (RDM) and the revised cuttings burial methodology (File reference 33:2021/0008-025~0014). The submission included a risk assessment prepared by EHS Support (August 2024), which detailed the results of leachability testing, assessed disposal options, evaluated environmental risks and outlined compliance with the *Code of Practice: Onshore Petroleum Activities in the Northern Territory (Code of Practice)* and the *Petroleum (Environment) Regulations 2016 (NT)*.

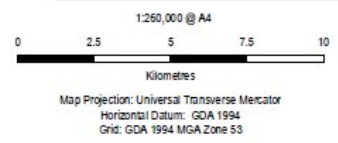
On 26 September 2024, DEPWS provided correspondence detailing acceptance of Santos' proposal to bury RDM on the Tanumbirini well pad site (File reference 33:2021/0034-013). Appendix A shows how Santos's RDM burial methodology complies with reporting requirements in the *Code of Practice: Onshore Petroleum Activities in the Northern Territory (Code of Practice)* and the *Petroleum (Environment) Regulations 2016 (NT)*.

Status of works:

- EMP 2021 was approved on 21 February 2021.
- This AEPR has been prepared to report on activities that have occurred under EMP 2021 between 21 February 2025 and 20 February 2026.
- On-site disposal of RDM was undertaken in Q4 2024 in accordance with the approved RDM burial methodology.
- No drilling activities were undertaken during the reporting period.



- Legend**
- Existing Road
  - Minor Road
  - New Road
  - Major Waterways
  - Principal Road
  - Inacumba Lease
  - Tanumbirini Lease



Santos  
McArthur Basin  
Environmental Management Plan

Project No. 12538768  
Revision No. A  
Date 5/11/2020

Proposed Infrastructure

**FIGURE ES-2**

S:\Documents\4212\ES1768\2019\Map\12538768\_003\_ProposedInfrastructure.mxd  
Print date: 05 Nov 2020 - 15:06

Date source: Google Earth Imagery (Jun 2016, captured Mar 2017) . GA: Roads, Waterways (2019) Santos: Project Sites, Proposed Access Roads, Existing Access Roads, Inacumba and Tanumbirini Lease Pads, Borehole Pits, Seismic Line (2019) Created by: cnicgregor

**Figure 1 McArthur Basin Drilling 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 2021.
- 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 Land, Planning and Environment (DLPE) (Petroleum Operations Branch).
- Recordable and reportable incident reports submitted to DLPE Petroleum Operations.
- Reports provided to DLPE, the Department of Energy and Mining (DEM) 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 from 21 February 2025 until 20 February 2026.**

Item No.	Ministerial Condition	Compliance Status	Evidence
1.	The interest holder must submit to the Department of Environment, Parks and Water Security (DEPWS), via Onshoregas.DEPWS@nt.gov.au: i. a timetable for the regulated activity that is to be provided prior to the commencement of the activity and each quarter thereafter, or more frequently should other constraints, such as seasonal weather forecasts or travel restrictions emerge, and including: <ul style="list-style-type: none"> <li>time-bound commitments in the EMP</li> <li>due dates for satisfaction of Ministerial approval conditions</li> <li>due dates for regulatory reporting; and</li> </ul>	<i>Compliant</i>	Submission of quarterly timetable occurred on: <ul style="list-style-type: none"> <li>Q1 31 March 2025</li> <li>Q2 30 June 2025</li> <li>Q3 30 September 2025</li> <li>Q4 31 December 2025</li> </ul> A timetable for regulated activities was completed for Q1, Q2, Q3 and Q4 2025.
	ii. during drilling, daily on-site reports indicating: <ul style="list-style-type: none"> <li>the status and progress of drilling;</li> <li>the freeboard available in drilling sumps (in cm);</li> <li>notification of any halt to the activity due to wet season conditions;</li> <li>notification of any fires potentially threatening the activity from external or internal sources; and</li> </ul>	<i>Not Applicable</i>	No drilling activities were undertaken during the reporting period.
	iii. during non-operational periods in the wet season, weekly reports on the freeboard available in drilling sumps (in cm); and	<i>Not Applicable</i>	No drilling sumps remain onsite
	iv. a seven-day activity forecast for the duration of the activity during the wet season (1 October - 30 April each year); and	<i>Not Applicable</i>	No drilling activities were undertaken during the reporting period.
	v. weekly reports that detail the outcome of site inspections, and corrective actions taken, and inclusive of all commitments in the approved EMP, from the commencement of the regulated activity and continuing while the EMP remains in force.	<i>Compliant</i>	Weekly reports were completed detailing the outcome of site inspections.  Submission of these reports occurred on:  2025 <ul style="list-style-type: none"> <li>March 3, 10, 17, 24, 31</li> <li>April 7, 14, 21, 28</li> </ul>

			<ul style="list-style-type: none"> <li>• May 5, 12, 19, 26</li> <li>• June 2, 9, 16, 23, 30</li> <li>• July 7, 14, 21, 28</li> <li>• August 4, 11, 18, 25</li> <li>• September 1, 8, 15, 22, 29</li> <li>• October 6, 13, 20, 27</li> <li>• November 3, 10, 17, 24</li> <li>• December 1, 8, 15, 22, 29</li> </ul> <p>2026</p> <ul style="list-style-type: none"> <li>• January 5, 12, 19, 27</li> <li>• February 2, 9, 16</li> </ul>
2.	In the event of any accidental release of contaminants that exceeds 200 litres (for liquids), the interest holder must provide a written report to DEPWS, via Onshoregas.DEPWS@nt.gov.au, as follows: i. within 24 hours, provide a written report with details of the incident specifying material facts and actions taken to avoid or mitigate environmental harm; and	<i>Not Applicable</i>	There were no accidental releases of contaminants.
	ii. within 14 days of the incident, provide a written report detailing: a. the volume of impacted soil removed for appropriate disposal and the depth of any associated excavations; and b. the corrective actions taken or proposed to be taken to prevent recurrence of an incident of a similar nature.	<i>Not Applicable</i>	There were no accidental releases of contaminants.
3.	The interest holder must provide an annual report to DEPWS, via Onshoregas.DEPWS@nt.gov.au, on its environmental performance, in accordance with item 11(1)(b) in schedule 1 of the Petroleum (Environment) Regulations 2016 (NT). The first report must cover the 12-month period from the date of the approval, and be provided within three calendar months of the end of the reporting period. The annual environmental performance report must align with the template prepared by DEPWS for this purpose.	<i>Compliant</i>	This Annual Environmental Performance Report.
4.	An emissions report must be provided to DEPWS by 30 September each year, via Onshoregas.DEPWS@nt.gov.au, which summarises actual annual greenhouse gas emissions reported under the Commonwealth National Greenhouse and Energy Reporting Act 2007 versus predicted emissions in the EMP.	<i>Compliant</i>	The annual emissions report was provided to DEPWS on 30 September 2025.
5.	In line with the approval conditions previously applied to the McArthur Basin drilling program, the interest holder must provide to DEPWS, via Onshoregas.DEPWS@nt.gov.au, a cementing report for the surface casing (13 3/8") through the aquifers, as soon as practicable but not more than fourteen days after completion of the cementing job for each well.	<i>Not Applicable</i>	No drilling was undertaken during the reporting period.

6.	In line with the approval conditions previously applied to the McArthur Basin drilling program, the interest holder must provide to DEPWS, via Onshoregas.DEPWS@nt.gov.au, the following:	<i>Not Applicable</i>	As per correspondence between Santos and DLPE on 3 April 2025. Santos has met the quarterly groundwater monitoring requirement, having sampled for a minimum of three years since the approval date of the EMP. As no drilling or fracture stimulation activities have occurred at the Inacumba site, these conditions are no longer required unless drilling or fracture stimulation activities is proposed at the site.
	i. results of groundwater monitoring (excluding continuous electrical conductivity monitoring) from the Inacumba Unit at the Inacumba well site, in accordance with the Code and the Preliminary Guideline: Groundwater Monitoring Bores for Exploration Petroleum Wells in the Beetaloo Sub-basin (DENR, 2018) every quarter for three years from the approval date of the EMP for publishing on the DEPWS website, in a format to be provided by DEPWS;	<i>Not Applicable</i>	As per correspondence between Santos and DLPE on 3 April 2025. Santos has met the quarterly groundwater monitoring requirement, having sampled for a minimum of three years since the approval date of the EMP. As no drilling or fracture stimulation activities have occurred at the Inacumba site, these conditions are no longer required unless drilling or fracture stimulation activities is proposed at the site.
	ii. results of continuous water level monitoring using water level loggers installed at the monitoring bores in the Inacumba Unit at the Inacumba well site, every quarter for three years for publishing on the DEPWS website, in a format to be provided by DEPWS; and	<i>Not Applicable</i>	As per correspondence between Santos and DLPE on 3 April 2025. Santos has met the quarterly groundwater monitoring requirement, having sampled for a minimum of three years since the approval date of the EMP. As no drilling or fracture stimulation activities have occurred at the Inacumba site, these conditions are no longer required unless drilling or fracture stimulation activities is proposed at the site.
	iii. results of groundwater monitoring (excluding continuous electrical conductivity monitoring) from the Gum Ridge Formation at the Tanumbirini well site, in accordance with the Code and the Preliminary Guideline: Groundwater Monitoring Bores for Exploration Petroleum Wells in the Beetaloo Sub-basin (DENR, 2018) for the period the well sites are operational, for publishing on the DEPWS website, in a format to be provided by DEPWS.	<i>Not Applicable</i>	As per correspondence between Santos and DLPE on 3 April 2025. Santos has completed groundwater monitoring at the Tanumbirini well site and provided these results. As the wells at Tanumbirini are currently shut in and not operational, this condition is no longer required unless the Tanumbirini well site becomes operational again or drilling or fracture stimulation activities is proposed at the Inacumba site.
7.	In support of clause B.4.17.2 of the Code, the interest holder must provide to DEPWS, via Onshoregas.depws@nt.gov.au, an interpretative report of groundwater quality based on the groundwater monitoring required to be conducted at the well site(s) in accordance with Table 6 of the Code. The interpretative report must be provided annually within three months of the anniversary of the approval date of the EMP and include:	<b>Compliant</b>	The interpretative report and non-technical summary on groundwater quality was provided to DEPWS on 20 May 2025.
	i. demonstration that there is no change to groundwater quality or level attributable to conduct of the regulated activity at the well site(s);	<b>Compliant</b>	The interpretative report and non-technical summary on groundwater quality was provided to DEPWS on 20 May 2025.
	ii. interpretation of any statistical outliers observed from baseline measured values for each of the analytes;	<b>Compliant</b>	The interpretative report and non-technical summary on groundwater quality was provided to DEPWS on 20 May 2025.
	iii. discussion of any trends observed; and	<b>Compliant</b>	The interpretative report and non-technical summary on groundwater quality was provided to DEPWS on 20 May 2025.
	iv. a summary of the results inclusive of descriptive statistics.	<b>Compliant</b>	The interpretative report and non-technical summary on groundwater quality was provided to DEPWS on 20 May 2025.
8.	In line with the approval conditions previously applied to the McArthur Basin drilling program, and in support of clause of the Code, the interest	<b>Compliant</b>	Santos provided a response to the DEPWS request for information regarding the management of residual drilling material (RDM) and

	<p>holder must provide to DEPWS, via Onshoregas.DEPWS@nt.gov.au, no later than three months of completion of the drilling program, a report that:</p> <p>i. provides the outcome of assessment and leachability testing of residual drill fluids and drill cuttings; and</p>		<p>the revised cuttings burial methodology (File reference 33:2021/0008-025~0014). The submission included a risk assessment prepared by EHS Support (August 2024), which detailed the results of leachability testing, assessed disposal options, evaluated environmental risks and outlined compliance with the <i>Code of Practice: Onshore Petroleum Activities in the Northern Territory (Code of Practice)</i> and the <i>Petroleum (Environment) Regulations 2016 (NT)</i>.</p> <p>On 26 September 2024, DEPWS provided correspondence detailing acceptance of Santos' proposal to bury RDM on the Tanumbirini well pad site (File reference 33:2021/0034-013).</p> <p>No drilling was undertaken during the 2025/26 reporting period.</p>
	<p>ii. provides the recommended disposal option.</p>	<p>Compliant</p>	<p>Santos provided a response to the DEPWS request for information regarding the management of residual drilling material (RDM) and the revised cuttings burial methodology (File reference 33:2021/0008-025~0014). On 26 September 2024, DEPWS provided correspondence detailing acceptance of Santos' proposal to bury RDM on the Tanumbirini well pad site (File reference 33:2021/0034-013).</p> <p>On-site disposal of RDM was completed in Q4 2024 in accordance with the approved RDM burial methodology.</p> <p>No drilling was undertaken during the 2025/26 reporting period.</p>

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**

Item No.	Environmental Outcome	Environmental Performance Standard	Measurement Criteria	Compliance Status	Evidence
1.	No significant impact to threatened flora or fauna species, their habitat or sites of conservation significance resulting from conduct of the regulated activity.	Injury and disturbance to threatened fauna during the conduct of the activity will be minimised.	Site induction records show all personnel have completed site inductions, which includes requirements for managing impacts to terrestrial fauna.	<i>Compliant</i>	All personnel had required inductions in accordance with the Santos Management System.
			IVMS records show 60km/hr speed limit adhered to and any noncompliance recorded.	<i>Compliant</i>	There were no incidents in the Incident Management System relating to speed limits or driving off permitted access tracks.
			IVMS records show no off-road driving.	<i>Compliant</i>	There were no incidents in the Incident Management System relating to speed limits or driving off permitted access tracks.
			Equipment maintenance logs demonstrate engines and machinery have been maintained in accordance with required maintenance schedule and have been fitted with noise suppression devices.	<i>Compliant</i>	Equipment maintenance logs were maintained and noise suppression devices fitted to machinery.

			Audit records of lighting at the camp show inward-facing lights that are adequate for safe operations.	<i>Not Applicable</i>	All regulated activities were conducted during daylight hours, no lighting required.
			Daily checklist shows inspection of fences, excavations, pits, storages for entrapped fauna and fauna escapes intact.	<i>Compliant</i>	Modification 22 (Modification 4 – Remote monitoring), accepted on 9 August 2024 reduced inspection frequencies and allowed the use of remote monitoring methodologies during no-operational periods.  No drilling sumps remain on site
			Daily checklist shows all domestic waste receptacles have lids secured.	<i>Not Applicable</i>	No relevant regulated activities were undertaken during the reporting period.
			Audit records show only waste from approved wastewater systems and grey water disposed of to land.	<i>Not Applicable</i>	No relevant regulated activities were undertaken during the reporting period.
2.		Dust generation on the well pad in the dry season will be minimised through tracking of wind forecasts, use of dust suppression when undertaking operations, and strict adherence to speed limits on unsealed roads.	Records show when and where water trucks have been used for dust control including weather condition observations.	<i>Not Applicable</i>	No relevant regulated activities were undertaken during the reporting period.
		No introduction of new species of weeds or plant pathogens, or increase in abundance of existing weed species, as a result of project activities.	IVMS records show no off-road driving.	<i>Compliant</i>	There were no incidents in the Incident Management System relating to speed limits or driving off permitted access tracks.
			IVMS records show 60km/hr speed limit adhered to and any noncompliance recorded.	<i>Compliant</i>	There were no incidents in the Incident Management System relating to speed limits or driving off permitted access tracks.
3.		No introduction of new species of weeds or plant pathogens, or increase in abundance of existing	Site induction records show all personnel have completed site inductions, which include information on weeds in the region and method of spread.	<i>Compliant</i>	All personnel had required inductions in accordance with the Santos Management System.

		weed species, as a result of project activities.	Audit records show weed management plan implemented in accordance with stated schedule.	<i>Compliant</i>	A post wet season weed survey was conducted in July 2025 and the report was provided to the NT weed branch on 20 October 2025.
			Hygiene declaration available for all vehicles coming into EP161 on each occasion.	<i>Compliant</i>	Hygiene declaration certificates available for all vehicles coming into EP161.
			Weed monitoring shows no new weed species introduced to work area.	<i>Compliant</i>	A post wet season weed survey was conducted in July 2025 and the report was provided to the NT weed branch on 20 October 2025. The survey identified no new weed species introduced to the work area.
4.		No fire in EP161 as a result of conduct of the regulated activity.	Site induction records show all personnel have completed site inductions, which include information on fire risk and impact to landholder for unplanned fire.	<i>Compliant</i>	Site induction records show all personnel have completed site inductions, which includes requirements for managing impacts to terrestrial fauna.
			Weekly checklist shows SDS available and appropriate and in-test firefighting equipment next to flammable material stores.	<i>Not Applicable</i>	No flammable material stores onsite.
			Weekly checklist shows all vehicles have portable fire extinguishers and operational VHF or UHF radio transceivers.	<i>Compliant</i>	Checklist show vehicles had portable fire extinguishers and operational VHF or UHF radio transceivers
			No use of petrol motor vehicles and audits show all petrol-powered pumps have spark arresters fitted.	<i>Compliant</i>	No use of petrol motor vehicles onsite.
			Training records shows staff trained in use of fire-fighting equipment.	<i>Compliant</i>	Staff trained to use fire firefighting equipment
			Training records verify that operations personnel participate in at least annual fire and emergency drills.	<i>Compliant</i>	Staff undertake annual emergency drills

			Records show toolbox meeting discussions of fire risk levels and fire risk management and remedial actions.	<i>Not Applicable</i>	No relevant regulated activities were undertaken during the reporting period
			Records show daily assessment of fire weather during dry season.	<i>Not Applicable</i>	No relevant regulated activities were undertaken during the dry season.
			No smoking allowed on site and any instance of smoking recorded as a non-conformance	<i>Compliant</i>	All personnel had required inductions in accordance with the Santos Management System.
5.	No significant impact to the quality and integrity of land and soils resulting from conduct of the regulated activity	No unauthorised physical disturbance to soil.	Site induction records shows all personnel have completed site inductions in accordance with section 7 of this Environmental Management Plan.	<i>Compliant</i>	All personnel had required inductions in accordance with the Santos Management System.
			Records show the erosion and sediment control plan implemented prior to the commencement of the activity	<i>Not Applicable</i>	No relevant regulated activities were undertaken during the dry season.
			VMS records show no off-road driving.	<i>Compliant</i>	There were no incidents in the Incident Management System relating to speed limits or driving off permitted access tracks.
			IVMS records show 60km/hr speed limit adhered to and any noncompliance recorded.	<i>Compliant</i>	There were no incidents in the Incident Management System relating to speed limits or driving off permitted access tracks.
6.		No releases of contaminants (wastes, wastewater, chemicals, hydrocarbons or drilling fluids) resulting in long-term contamination of the soil	Weekly inspection checklists confirm all hazardous materials and stored and managed in accordance with the EMP, the Code of practice and the WOMP.	<i>Not Applicable</i>	No relevant regulated activities were undertaken during the dry season.
			Records of spills and completed remediation in the Santos Incident Management System.	<i>Compliant</i>	No records of spill during the reporting period.
			A record of the assessment of environmental hazards posed by the drill cuttings to determine disposal methods.	<i>Not Applicable</i>	No relevant regulated activities were undertaken during the dry season.

			Daily inspection records confirm the freeboard is sufficient to accommodate the relevant wet season and dry season freeboard requirements, and that the pit integrity is appropriate	<i>Not Applicable</i>	No drilling pits remain onsite
			Audit records show Bureau of Meteorology provided timely notification significant rainfall event and site evacuation plan put into place following notification.	<i>Compliant</i>	Bureau of Meteorology provided notification of significant rainfall events.
7.	No significant impact on Inland environmental water quality resulting from conduct of the regulated activity	No releases of contaminants (wastes, wastewater, chemicals, hydrocarbons or drilling fluids) resulting in long-term contamination of the waters.	Well control monitoring demonstrates adequate well control.	<i>Not Applicable</i>	No relevant regulated activities were undertaken during the reporting period
			Well acceptance criteria met.	<i>Not Applicable</i>	No relevant regulated activities were undertaken during the reporting period
			Weekly inspection checklist confirms compliance with the EMP, the Code and the WOMP.	<i>Compliant</i>	No records of spill during the reporting period.
			Records of spills and completed remediation in the Incident Management System	<i>Compliant</i>	Records of spills and completed remediation in the Incident Management System.
			Road conditions for heavy vehicle transport will be assessed prior to mobilisation on unsealed roads.	<i>Not Applicable</i>	No relevant regulated activities were undertaken during the reporting period
			Daily inspection records confirm the freeboard is sufficient to accommodate the relevant wet season and dry season freeboard requirements, and that the pit integrity is appropriate	<i>Not Applicable</i>	No drilling pits remain onsite
			Audit records show Bureau of Meteorology provided timely notification significant rainfall event and site evacuation plan	<i>Compliant</i>	Bureau of Meteorology provided notification of significant rainfall events.

			put into place following notification.		
8.		No reduction to groundwater resource availability in the area as a result of project activities.	Groundwater extraction volumes at the end of the project provided to DITT and DEPWS.	<i>Compliant</i>	The project is ongoing.
			Groundwater monitoring results show groundwater quality, extraction volumes and static water level are relatively unchanged and water availability is unchanged.	<i>Compliant</i>	The interpretative report and non-technical summary on groundwater quality was provided to DEPWS on 20 May 2025.
9.	No significant impact on air quality and minimise emissions (including greenhouse gas emissions) and their impact so that environmental values are maintained	No reduction in air quality as a result of project activities.	Audit records demonstrate vehicles compliant with Northern Territory Motor Vehicle registry regulation and work health and safety regulations.	<i>Compliant</i>	All vehicles comply with vehicles compliant with Northern Territory Motor Vehicle registry regulation and work health and safety regulations.
			Real time monitoring and gas detection monitoring data confirms no reduction in air quality / fugitive emissions.	<i>Not Applicable</i>	No relevant regulated activities were undertaken during the reporting period
10.		Minimise greenhouse gas emissions resultant from project activities.	Audit records demonstrate that actual emissions were reported in compliance NGERS	<i>Compliant</i>	The annual emissions report was provided to DEPWS on 30 September 2025.
11.	No impact on the health of the Northern Territory population	Dust generation on the well pad in the dry season will be minimised through tracking of wind forecasts, use of dust suppression when undertaking operations, and strict adherence to speed limits on unsealed roads.	Site induction records show all personnel have completed site inductions in accordance with section 7 of this Environmental Management Plan.	<i>Compliant</i>	All personnel had required inductions in accordance with the Santos Management System.
			IVMS records show speed limits adhered to.	<i>Compliant</i>	There were no incidents in the Incident Management System relating to speed limits or driving off permitted access tracks.
			Any off-road has been reported to the supervisor and investigated.	<i>Compliant</i>	There were no incidents in the Incident Management System relating to speed limits or driving off permitted access tracks.
			Stakeholder engagement records demonstrate all reasonable dust complaints received were resolved; or if	<i>Compliant</i>	Stakeholder engagement records show no complaints were received regarding dust.

			unable to be resolved, dust monitoring demonstrates dust emissions comply with the relevant legislation		
12.	Minimise negative impact to communities and enhance the economy	Noise complaints from vehicle movements and drilling activities associate with the project are minimised. Amicable resolution of complaints	Stakeholder engagement records show active consultation with surrounding stakeholders on any potential noise increase and results of these consultations.	<i>Compliant</i>	Stakeholder engagement records show no complaints were received regarding dust.
13.		Disturbance, injury or death to livestock from vehicle movements and drilling activities minimised through active stakeholder engagement	Daily inspection records show fences are intact, gates are left in the condition in which they were found and no livestock entrapment.	<i>Compliant</i>	No disturbance, injury or death to livestock from vehicle movements were reported through stakeholder engagement. Records show fences are intact, gates are left in the condition in which they were found and no livestock entrapment.
			Site induction records show all personnel have completed site inductions in accordance with section 7 of this Environmental Management Plan.	<i>Compliant</i>	All personnel had required inductions in accordance with the Santos Management System.
			Stakeholder engagement records demonstrate active stakeholder engagement (i.e. notification prior to the commencement of activities).	<i>Compliant</i>	Stakeholder engagement records show notification prior to the commencement of activities.
14.		Disturbance to landholders from vehicle movements and drilling activities minimised. Amicable resolution of complaints.	Site induction records show all personnel have completed site inductions in accordance with section 7 of this Environmental Management Plan.	<i>Compliant</i>	All personnel had required inductions in accordance with the Santos Management System. No drilling activities were undertaken during the reporting period.
			Stakeholder engagement records demonstrate all reasonable disturbance complaints received were resolved; or if unable to be resolved, dust monitoring demonstrates dust emissions comply with the relevant legislation.	<i>Compliant</i>	Stakeholder engagement records show no complaints were received regarding dust.
15.	Protect sacred sites, culture and heritage	No impact to sacred sites, culture and heritage	Audit records show that all activities including horizontal drilling occur within the areas	<i>Not Applicable</i>	No relevant regulated activities were undertaken during the reporting period

			shown in AAPA Authority Certificate C2019/043.		
			Records show that sacred site data provided for it in the GIS is accurate, maintained and updated	<i>Compliant</i>	Maintained a GIS database that includes project areas and cultural heritage sites. This database is updated when additional information is available.

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>Not applicable</i>	No clearing was undertaken
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 DEPWS (Appendix E of approved EMP) contains monitoring requirements. This plan was complied with during the reporting period.  A post wet season weed survey was conducted in July 2025 and the report was provided to the Nt weed branch on 30 October 2025.
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>	Fire management plan, section 7.2 of approved EMP makes provision for this requirement of the Code.  In accordance with the fire management plan if a fire has occurred in and around the project footprint, Santos in consultation with the pastoralist and with the pastoralist's approval endeavour to map the extent of the fire and provide that information to DENR.  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>Not applicable</i>	The Rehabilitation Management Plan, section 7.3 of approved EMP makes provision for this requirement of the code.

				No rehabilitation activities were conducted as part of this EMP.
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.
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>Compliant</i>	Reporting and data submission, and groundwater monitoring data standards were in accordance with Preliminary Guideline: Groundwater Monitoring Bores for Exploration Petroleum Wells in the Beetaloo Sub-basin.
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.	<i>Compliant</i>	The wastewater management plan (Appendix G) and spill management plan (Appendix H) of EMP 2021 makes provision for this requirement of the code. There was no wastewater onsite during the reporting period
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	<i>Compliant</i>	The wastewater management plan (Appendix G of EMP 2021) makes provision for this requirement of the code.

		measures for the mitigation of interaction with wildlife, stock and human receptors with wastewater.		
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>Compliant</i>	The annual emissions report was provided to DEPWS on 30 September 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>Compliant</i>	The annual emissions report was provided to DEPWS on 30 September 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 groundwater monitoring reports, ecological assessment reports and weed management plans appended to the approved EMP.
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>Compliant</i>	The annual emissions report was provided to DEPWS on 30 September 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>	Stakeholder engagement logs indicate that engagement with stakeholders has been ongoing.
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>	No regulated activities were undertaken during the reporting period.

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).	<b>Compliant</b>	Reports on all recordable incidents were provided on: <ul style="list-style-type: none"> <li>• Q1 2025 report provided 14 April 2025</li> <li>• Q2 2025 report provided 11 July 2025</li> <li>• Q3 2025 report provided 15 October 2025</li> <li>• Q4 2025 report provided 14 January 2026</li> </ul>
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 regulated activities were undertaken during the reporting period.
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 regulated activities were undertaken during the reporting period.
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 103 total compliance items.

**Table 5: Compliance Summary**

Compliance Indicator	Number	Percentage
Compliant	62	60%
Not Compliant	0	0%
Not Applicable	42	40%

### 3.2. Overview of items found Not Compliant

The following sections describe the 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.

# Appendix A: RDM Burial Compliance

The table below 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)* for the RDM burial methodology. This table should be read in conjunction with Tanumbirini Residual Drilling Material Burial Method provided to DEPWS on 9 September 2024 (File reference 33:2021/0008-025~0014).

Number	Requirement	Compliant	Evidence
C.4.1.2 (a)	Waste drilling fluid shall be managed in accordance with the WWMP and SMP.	Not Applicable	Not Applicable
C.4.1.2 (b)	Any residual drilling fluids and cuttings must be contained within: i. engineered pits, lined with an impermeable membrane with a coefficient of permeability of less than $10^{-9}$ m/s tested in accordance with AS 1289.6.7.2 and with resistance to tearing >0.5 kN (ASTM D 4073); static puncture >0.5 kN (ASTM D 4833); and tensile strength >20 kN/m (ASTM D 7275); or ii. above ground storage tanks with secondary containment measures as detailed in B.4.16.2(h).	Not Applicable	Not Applicable
C.4.1.2 (c)	An assessment of environmental impacts and environmental risks posed by the drill cuttings and residual drilling fluids must be carried out.	Compliant	RDM Burial Method Risk Assessment
C.4.1.2 (d)	Disposal options for drill cuttings and residue from drilling fluids must take into account the results of the assessment in C.4.1.2 (c).	Compliant	RDM Burial Method, RDM Burial Method Risk Assessment, Attachment A
C.4.1.2 (e)	Leachability testing of drill cuttings must be undertaken in accordance with the Australian Standard Leaching Procedure (AS 4439.2 and 4439.3) by a NATA-accredited laboratory. The analytes and method for drilling waste assessment for this assessment are shown in Table 10.	Compliant	RDM Burial Method, Attachment A
C.4.1.2 (f)	If seeking approval to dispose of residue from drilling fluids on-site, the EMP must include a certification from a suitably qualified third party that the material is of acceptable quality for land disposal and will not cause environmental harm. A suitably qualified third party means someone who: i. Has relevant qualifications and experience, including: a. a bachelor's degree in science or engineering; and b. 3 years' experience in soil contamination assessment; ii. Is registered under section 68 of the <i>Waste Management and Pollution Control Act 1998 (NT)</i> ; and iii. Is independent of the interest holder (no employment, financial interest or conflict of interest).	Compliant	Certification, Attachment A
C.4.1.2 (g)	Control measures must be implemented to minimise the interactions of wildlife, stock, and human receptors with drilling fluids.	Compliant	RDM Burial Method, RDM Burial Method Risk Assessment