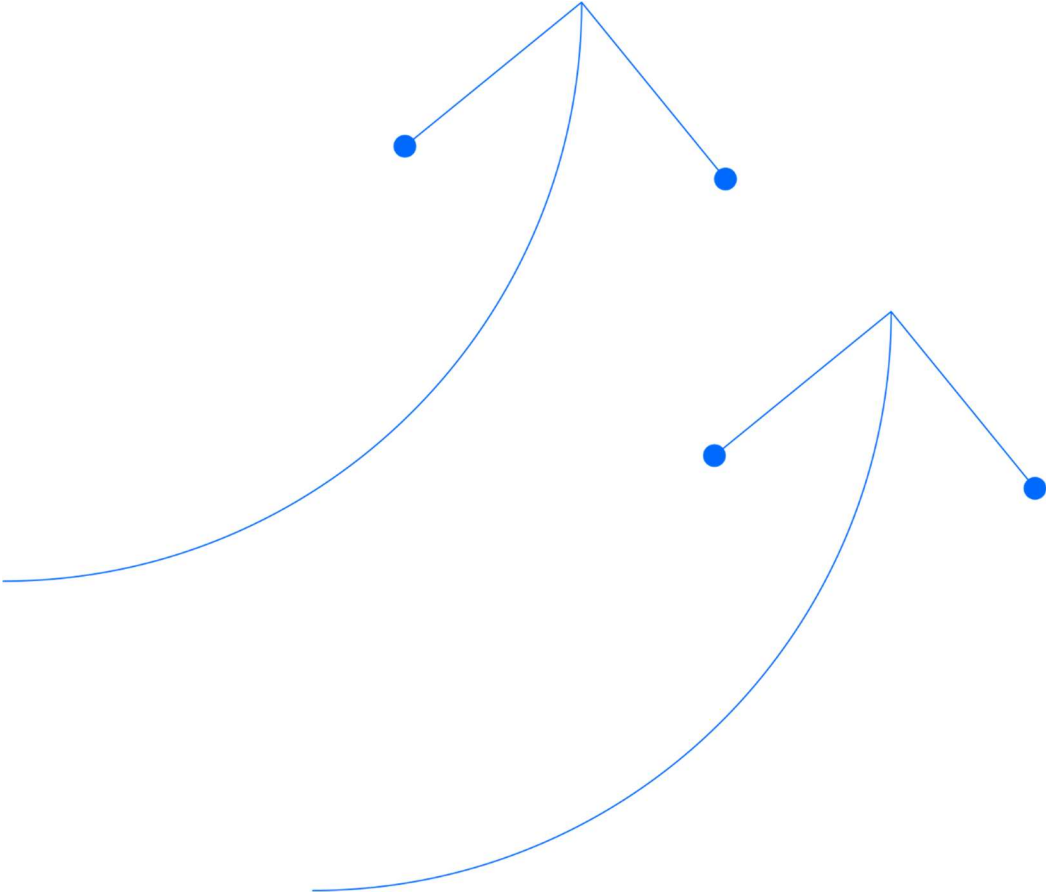



# ANNUAL ENVIRONMENTAL PERFORMANCE REPORT 2025

EP 161 2D Seismic and Ground Gravity Survey Program



<b>Document Title</b>	<b>Annual Environmental Performance Report 2025</b> <b>EP 161 2D Seismic and Ground Gravity Survey Program</b>
<b>Environmental Management Plan covered</b>	EP 161 2D Seismic and Ground Gravity Survey Program (STO7-4) (Ref: NTEPA2023/0162-006~0001)
<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>	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 161 2D Seismic and Ground Gravity Survey Program that was approved on 03 September 2024 (Figure 1). The period covered by this AEPR is from 01 July 2024 to 30 June 2025.

## 1.1. Background

Santos QNT Pty Ltd (Santos) submitted *STO7-4: EP161 2D Seismic and Ground Gravity Survey Program, EP161 Environment Management Plan, dated 6 August 2024* (EMP 2024) under the PER that came into force 6 July 2016. EMP 2024 was submitted to cover the following scope:

- Mobilisation and establishment of a temporary camp, including an equipment parking and fuelling area.
- Maintenance and monitoring of pre-existing access tracks.
- Where necessary, line preparation of 5 m wide seismic lines and any required connection lines between seismic lines with a mulcher.
- Conducting a 2D seismic and ground gravity survey.
- Demobilisation of temporary camp and monitoring of rehabilitation of seismic and connection lines prepared under this EMP that are not along pre-existing tracks.

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

- New equipment to be used during seismic acquisition (02 October 2024)
- Detours outside the nominal 50 m corridor to avoid hazards (01 November 2021)

Status of works:

- EMP 2024 was approved on 30 September 2024.
- This AEPR has been prepared to report on activities that have occurred under EMP 2024 between 01 July 2024 to 30 June 2025.
- Regulated activities were undertaken between 10 October 2024 to 22 January 2025 including:
  - Mobilisation, camp setup and inductions.
  - Line preparation.
  - Seismic line recording.
  - Minor civil works and maintenance.

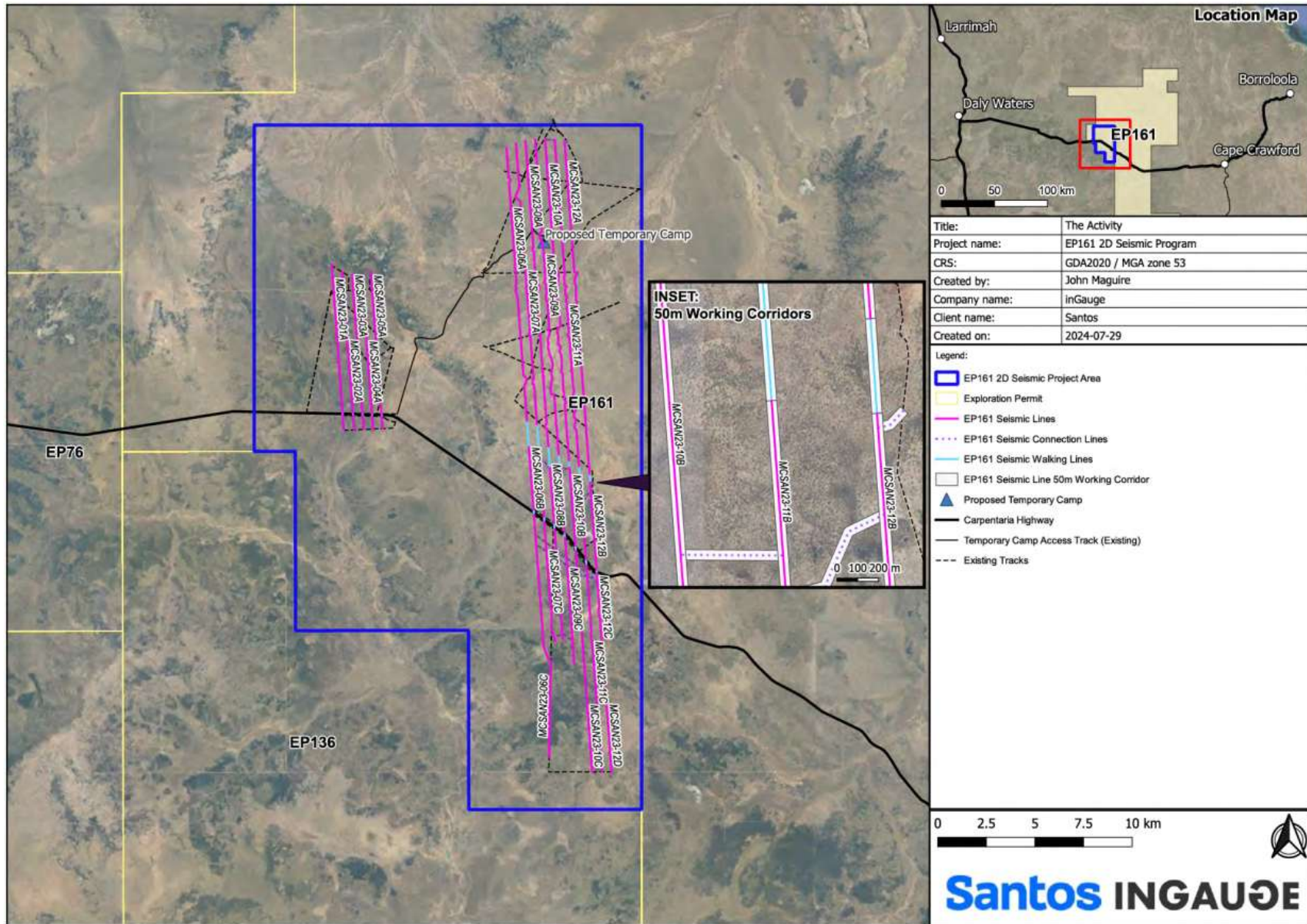


Figure 1 EP 161 2D Seismic and Ground Gravity Survey Program Location

## 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 01 July 2024 to 30 June 2025.**

Item No.	Ministerial Condition	Compliance Status	Evidence
1.	The interest holder must submit to Onshoregas.DEPWS@nt.gov.au a notification if seismic activities (being seismic line preparation, seismic survey and rehabilitation of seismic lines) and civil works (being all ground disturbing activities, including earth moving, land clearing and establishment of access tracks) are proposed to be conducted during the upcoming Wet Season (as defined in the <i>Code of Practice: Onshore Petroleum Activities in the Northern Territory (2019)</i> (the Code)). The notification must be made at least 1 week prior to activities occurring. The notification must include:	<i>Compliant</i>	<p>Notice of intention to conduct works was supplied to DLPE on the following dates:</p> <ul style="list-style-type: none"> <li>Seismic survey: 10 October 2024 (survey commenced 20 October 2024)</li> <li>Civil works: 8 January 2025 (works commenced 15 January 2025)</li> </ul> <p>The notice of intention included a location map of the planned activities.</p>
	<ul style="list-style-type: none"> <li>i. the location of the proposed seismic activities or civil works; and</li> <li>ii. the proposed timeframe for conducting the activities.</li> </ul>		
2.	Within 24 hours of commencing or completing seismic and civil activity programs, the interest holder must submit to Onshoregas.DEPWS@nt.gov.au a notification that the activities have commenced or ceased, including the date the activities commenced and/or ceased and the location of the activities.	<i>Compliant</i>	<p>Notification was provided to DLPE regarding commencement and completion of seismic and civil activities on the following dates:</p> <ul style="list-style-type: none"> <li>Seismic survey: <ul style="list-style-type: none"> <li>Commencement: 24 October 2024 (activities commenced 25 October 2024)</li> <li>Completion: 4 December 2024 (activities completed 3 December 2024)</li> </ul> </li> <li>Civil activities (line preparation): <ul style="list-style-type: none"> <li>Commencement: 10 October 2024 (activities commenced 11 October 2024)</li> <li>Completion: 22 November 2024 (activities completed 22 November 2024)</li> </ul> </li> <li>Civil activities (minor line maintenance):</li> </ul>

Item No.	Ministerial Condition	Compliance Status	Evidence
			<ul style="list-style-type: none"> <li>○ Commencement: 16 January 2025 (activities commenced 16 January 2025)</li> <li>○ Completion: 23 January 2025 (activities completed 22 January 2025)</li> </ul> <p>The notice of intention included a location map and proposed timeframe of the planned activities.</p>
3.	By 1 October of each year, the interest holder must submit to Onshoregas.DEPWS@nt.gov.au a completed Annual Environmental Performance Report Template (AEPR) for the preceding 12-month period of 1 July to 30 June. The AEPR Template must be completed in accordance with the Onshore Petroleum Annual Environmental Performance Reporting Guideline (21 December 2023).	<i>Compliant</i>	This Annual Environmental Performance Report.
4.	Within five 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>Non-Compliant</i>	<p>Quarterly reports were submitted to DLPE on the following dates:</p> <ul style="list-style-type: none"> <li>• Q3 2024: 6 October 2024</li> <li>• Q4 2024: 8 January 2025</li> <li>• Q1 2025: 11 April 2025</li> <li>• Q2 2025: 2 July 2025</li> </ul> <p>Quarterly reports detailed the regulated activities completed in the previous quarter.</p> <p>It is noted that the quarterly report for Q1 2025 was submitted on 11 April 2025 instead of 08 April 2025 due to an internal software error. The Department notes that the non-compliance was administrative in nature and did not result in any actual or potential environmental harm. The Department acknowledged Santos' corrective actions and cooperation in an email dated 14 May 2025 and closed this out.</p>
	ii. regulated activities to be conducted in the next quarter, including estimated duration;	<i>Non-Compliant</i>	<p>Quarterly reports were submitted to DLPE on the following dates:</p> <ul style="list-style-type: none"> <li>• Q3 2024: 6 October 2024</li> <li>• Q4 2024: 8 January 2025</li> <li>• Q1 2025: 11 April 2025</li> <li>• Q2 2025: 2 July 2025</li> </ul> <p>Quarterly reports detailed the regulated activities to be conducted in the following quarter.</p> <p>It is noted that the quarterly report for Q1 2025 was submitted on 11 April 2025 instead of 08 April 2025 due to an internal software error. The Department notes that the non-compliance was administrative in nature and did not result in any actual or potential environmental harm. The Department acknowledged Santos' corrective actions and cooperation in an email dated 14 May 2025 and closed this out.</p>

Item No.	Ministerial Condition	Compliance Status	Evidence
	iii. the date any conditions of this approval were completed in the previous quarter;	<i>Non-Compliant</i>	<p>Quarterly reports were submitted to DLPE on the following dates:</p> <ul style="list-style-type: none"> <li>• Q3 2024: 6 October 2024</li> <li>• Q4 2024: 8 January 2025</li> <li>• Q1 2025: 11 April 2025</li> <li>• Q2 2025: 2 July 2025</li> </ul> <p>Quarterly reports provided completion dates of approval conditions completed in the previous quarter.</p> <p>It is noted that the quarterly report for Q1 2025 was submitted on 11 April 2025 instead of 08 April 2025 due to an internal software error. The Department notes that the non-compliance was administrative in nature and did not result in any actual or potential environmental harm. The Department acknowledged Santos' corrective actions and cooperation in an email dated 14 May 2025 and closed this out.</p>
	iv. the date any conditions of this approval are due for completion in the next quarter; and	<i>Non-Compliant</i>	<p>Quarterly reports were submitted to DLPE on the following dates:</p> <ul style="list-style-type: none"> <li>• Q3 2024: 6 October 2024</li> <li>• Q4 2024: 8 January 2025</li> <li>• Q1 2025: 11 April 2025</li> <li>• Q2 2025: 2 July 2025</li> </ul> <p>Quarterly reports provided dates for conditions of approval due for completion in the following quarter.</p> <p>It is noted that the quarterly report for Q1 2025 was submitted on 11 April 2025 instead of 08 April 2025 due to an internal software error. The Department notes that the non-compliance was administrative in nature and did not result in any actual or potential environmental harm. The Department acknowledged Santos' corrective actions and cooperation in an email dated 14 May 2025 and closed this out.</p>
	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>Non-Compliant</i>	<p>Quarterly reports were submitted to DLPE on the following dates:</p> <ul style="list-style-type: none"> <li>• Q3 2024: 6 October 2024</li> <li>• Q4 2024: 8 January 2025</li> <li>• Q1 2025: 11 April 2025</li> <li>• Q2 2025: 2 July 2025</li> </ul> <p>Quarterly reports detailed monitoring and compliance activities to be conducted in the following quarter.</p> <p>It is noted that the quarterly report for Q1 2025 was submitted on 11 April 2025 instead of 08 April 2025 due to an internal software error. The Department notes that the non-compliance was administrative in nature and did not result in any actual or potential environmental</p>

Item No.	Ministerial Condition	Compliance Status	Evidence
			harm. The Department acknowledged Santos' corrective actions and cooperation in an email dated 14 May 2025 and closed this out.
5.	<p>While regulated activities occur 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:</p> <p>i. whether unsealed access roads were used by any vehicle or machinery, other than a light vehicle;</p>	<i>Compliant</i>	<p>Weekly progress reports were provided to DLPE on the following dates:</p> <ul style="list-style-type: none"> <li>• 14 October 2024</li> <li>• 21 October 2024</li> <li>• 28 October 2024</li> <li>• 04 November 2024</li> <li>• 11 November 2024</li> <li>• 18 November 2024</li> <li>• 25 November 2024</li> <li>• 02 December 2024</li> <li>• 09 December 2024</li> <li>• 23 January 2025</li> </ul> <p>Weekly reports included details regarding heavy vehicle unsealed road usage.</p>
	<p>ii. 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.</p>	<i>Compliant</i>	<p>Weekly progress reports were provided to DLPE on the following dates:</p> <ul style="list-style-type: none"> <li>• 14 October 2024</li> <li>• 21 October 2024</li> <li>• 28 October 2024</li> <li>• 04 November 2024</li> <li>• 11 November 2024</li> <li>• 18 November 2024</li> <li>• 25 November 2024</li> <li>• 02 December 2024</li> <li>• 09 December 2024</li> <li>• 23 January 2025</li> </ul> <p>Weekly reports included details regarding rain delays.</p>
6.	<p>The interest holder must submit the weekly reports required by conditions 5, by 5 pm ACST each Monday for the preceding week or part thereof.</p>	<i>Compliant</i>	<p>Weekly progress reports were provided to DLPE on the following dates:</p> <ul style="list-style-type: none"> <li>• 14 October 2024</li> <li>• 21 October 2024</li> <li>• 28 October 2024</li> <li>• 04 November 2024</li> <li>• 11 November 2024</li> <li>• 18 November 2024</li> <li>• 25 November 2024</li> <li>• 02 December 2024</li> <li>• 09 December 2024</li> </ul>

Item No.	Ministerial Condition	Compliance Status	Evidence
			<ul style="list-style-type: none"> <li>23 January 2025</li> </ul> All weekly reports were submitted to DLPE prior to Monday 5 pm ACST each week during the reporting period.
7.	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	Recordable incident reports were submitted to DLPE on the following dates: <ul style="list-style-type: none"> <li>Q3 2024: 15 October 2024</li> <li>Q4 2024: 15 January 2025</li> <li>Q1 2025: 15 April 2025</li> <li>Q2 2025: 15 July 2025</li> </ul>
8.	Within 30 days of completing the seismic program, the interest holder must submit to Onshoregas.DEPWS@nt.gov.au geospatial files of the seismic lines or other ground disturbing activities (including earth moving, land clearing and establishment of access tracks) and identify the areas which required mulching, required slashing, or did not require slashing or mulching (as shapefiles and inclusive of metadata).	Compliant	Shapefiles of the extents of seismic lines and other ground disturbing activities were supplied to Onshoregas.DLPE@nt.gov.au on 19 December 2024.
9.	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: <ol style="list-style-type: none"> <li>calculate emissions in accordance with the National Greenhouse and Energy Reporting (Measurement) Determination 2008;</li> </ol>	Not Applicable	The emissions report required under this condition will be submitted by 31 October 2025 for the reporting period of 1 July 2024 – 30 June 2025.
	<ol style="list-style-type: none"> <li>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) versus predicted emissions in the EMP (STO7-4);</li> </ol>	Not Applicable	The emissions report required under this condition will be submitted by 31 October 2025 for the reporting period of 1 July 2024 – 30 June 2025.
	<ol style="list-style-type: none"> <li>include a summary of all regulated activities conducted under this EMP which have contributed to greenhouse gas emissions during the reporting period; and</li> </ol>	Not Applicable	The emissions report required under this condition will be submitted by 31 October 2025 for the reporting period of 1 July 2024 – 30 June 2025.
	<ol style="list-style-type: none"> <li>account for differences between actual and predicted emissions with reference to all parts of the regulated activity with potential to create greenhouse gas emissions.</li> </ol>	Not Applicable	The emissions report required under this condition will be submitted by 31 October 2025 for the reporting period of 1 July 2024 – 30 June 2025.
10.	The interest holder must record all accidental releases of liquid contaminant or hazardous chemicals in a site spill register, which records: <ol style="list-style-type: none"> <li>the liquid contaminant or hazardous chemical spilled or leaked;</li> </ol>	Compliant	A site spill register was maintained and recorded the following information: <ul style="list-style-type: none"> <li>Date of incident.</li> <li>Liquid contaminant or hazardous chemical spilled or leaked.</li> <li>GPS co-ordinates of the location of the spill or leak.</li> <li>Source and volume of the spill or leak.</li> <li>Volume of impacted soil removed for disposal and the depth of any associated excavation.</li> </ul>

Item No.	Ministerial Condition	Compliance Status	Evidence
			<ul style="list-style-type: none"> <li>• Corrective actions taken or proposed to be taken to prevent recurrence of an incident of a similar nature.</li> <li>• Waste storage containment for disposal</li> </ul>
	ii. the GPS co-ordinates of the location of the spill or leak;	<i>Compliant</i>	<p>A site spill register was maintained and recorded the following information:</p> <ul style="list-style-type: none"> <li>• Date of incident.</li> <li>• Liquid contaminant or hazardous chemical spilled or leaked.</li> <li>• GPS co-ordinates of the location of the spill or leak.</li> <li>• Source and volume of the spill or leak.</li> <li>• Volume of impacted soil removed for disposal and the depth of any associated excavation.</li> <li>• Corrective actions taken or proposed to be taken to prevent recurrence of an incident of a similar nature.</li> <li>• Waste storage containment for disposal</li> </ul>
	iii. the source and volume of the spill or leak;	<i>Compliant</i>	<p>A site spill register was maintained and recorded the following information:</p> <ul style="list-style-type: none"> <li>• Date of incident.</li> <li>• Liquid contaminant or hazardous chemical spilled or leaked.</li> <li>• GPS co-ordinates of the location of the spill or leak.</li> <li>• Source and volume of the spill or leak.</li> <li>• Volume of impacted soil removed for disposal and the depth of any associated excavation.</li> <li>• Corrective actions taken or proposed to be taken to prevent recurrence of an incident of a similar nature.</li> <li>• Waste storage containment for disposal</li> </ul>
	iv. the volume of impacted soil removed for disposal and the depth of any associated excavation; and	<i>Compliant</i>	<p>A site spill register was maintained and recorded the following information:</p> <ul style="list-style-type: none"> <li>• Date of incident.</li> <li>• Liquid contaminant or hazardous chemical spilled or leaked.</li> <li>• GPS co-ordinates of the location of the spill or leak.</li> <li>• Source and volume of the spill or leak.</li> <li>• Volume of impacted soil removed for disposal and the depth of any associated excavation.</li> <li>• Corrective actions taken or proposed to be taken to prevent recurrence of an incident of a similar nature.</li> <li>• Waste storage containment for disposal</li> </ul>

Item No.	Ministerial Condition	Compliance Status	Evidence
	v. the corrective actions taken or proposed to be taken to prevent recurrence of an incident of a similar nature.	<i>Compliant</i>	A site spill register was maintained and recorded the following information: <ul style="list-style-type: none"> <li>• Date of incident.</li> <li>• Liquid contaminant or hazardous chemical spilled or leaked.</li> <li>• GPS co-ordinates of the location of the spill or leak.</li> <li>• Source and volume of the spill or leak.</li> <li>• Volume of impacted soil removed for disposal and the depth of any associated excavation.</li> <li>• Corrective actions taken or proposed to be taken to prevent recurrence of an incident of a similar nature.</li> <li>• Waste storage containment for disposal</li> </ul>
11.	Within 90 days of the anniversary of the approval of the EMP (STO7-4), and thereafter annually, the interest holder must provide a rehabilitation report which: <p>i. provides the dates vegetation monitoring analogue sites were established and surveyed during the preceding 12 month period;</p>	<i>Compliant</i>	The annual rehabilitation report was completed between 05 July 2025 and 15 July 2025 and will be provided to the Department in accordance with Condition 11.
	<p>ii. provides the dates rehabilitation monitoring was undertaken during the preceding 12 month period;</p>	<i>Compliant</i>	The annual rehabilitation report was completed between 05 July 2025 and 15 July 2025 and will be provided to the Department in accordance with Condition 11.
	<p>iii. analyses and compares rehabilitation progress against analogue sites and the rehabilitation criteria in the EMP;</p>	<i>Compliant</i>	The annual rehabilitation report was completed between 05 July 2025 and 15 July 2025 and will be provided to the Department in accordance with Condition 11.
	<p>iv. includes corrective actions identified for rehabilitated areas and the date those corrective actions were implemented, or the date they are proposed to be implemented; and</p>	<i>Compliant</i>	The annual rehabilitation report was completed between 05 July 2025 and 15 July 2025 and will be provided to the Department in accordance with Condition 11.
	<p>v. is accompanied by geospatial files (as shapefiles and inclusive of metadata) identifying the areas rehabilitated during the preceding 12-month period.</p>	<i>Compliant</i>	The annual rehabilitation report was completed between 05 July 2025 and 15 July 2025 and will be provided to the Department in accordance with Condition 11.

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
The Activity will not result in permanent degradation of native flora and fauna.	Introduced predators are not attracted to waste storage points.	During operations, a daily checklist shows designated waste areas are inspected and managed to prevent overflow.	<i>Compliant</i>	Daily compliance checklist confirmed designated waste areas were inspected and waste volumes were appropriately managed.
	No introduction of declared or priority weeds on lines mulched for seismic.	Vehicle hygiene certificates are available with all equipment on-site during the Activity, showing they are clear of biosecurity risk material.	<i>Compliant</i>	Completed vehicle hygiene certificates were available for all equipment on-site.
		Annual post-wet season weed survey report submitted to DEPWS.	<i>Compliant</i>	An annual post-wet season weed survey was completed between 05 July 2025 and 15 July 2025. The report will be submitted to the NT Weed Officer once finalised.
No uncontrolled fire started because of the Activity.	Daily operational reports demonstrate preparation in case of an emergency, e.g., they cover the presence of fire firefighting capacity (in vehicle, campsite and/or Fire Tender).	<i>Compliant</i>	Daily operational toolbox report contains emergency response preparation and bushfire risk.	
		<i>Compliant</i>	Daily operational reports show bushfire risk is considered prior to commencing the Activity.	
Rehabilitation commitments adhered to.	Annual rehabilitation survey reports demonstrate progressive rehabilitation against analogue sites.	<i>Compliant</i>	Annual rehabilitation assessment was conducted between 05 July 2025 and 15 July 2025. The report will be provided to the Department in accordance with Condition 11.	
	Maintenance records demonstrate corrective actions taken to improve rehabilitation outcomes are occurring where required.	<i>Compliant</i>	Annual rehabilitation assessment was conducted between 05 July 2025 and 15 July 2025. The report will be provided to the Department in accordance with Condition 11. Santos will undertake corrective actions to improve rehabilitation outcomes as identified in the report.	

Environmental Outcome	Environmental Performance Standard	Measurement criteria	Compliance Status	Evidence
	No adverse impacts to threatened fauna species.	Fauna Spotter survey records demonstrate that riparian areas are ground truthed, and large diameter trees are avoided using the decision tree checklist.	Compliant	Fauna Spotter Catcher (FSC) records were compiled in the Fauna Management Plan. FSC activities utilised the Riparian Vegetation Decision Tree and Tree Mulching Decision Tree checklists.
		Records of pre-line preparation survey demonstrate scouting conducted for active Grey Falcon nests.	Compliant	A pre-clearance preparation survey was conducted and compiled within the Pauna Management Plan. The survey fauna values associated with ground features and trees, including breeding sites and hollow bearing trees.
		Spatial data files demonstrate that a vehicle free exclusion zone of 300 m was kept between the line preparation and acquisition activity and any identified active Grey Falcon nests within or adjacent to a seismic working corridor.	Compliant	Spatial data was collected during line preparation and seismic acquisition.
		Records of completed tree mulching decision tree checks demonstrate consideration for avoidance over mulching every tree with a diameter greater than 25 cm at 1.3 m above the ground.	Compliant	Fauna Spotter Catcher (FSC) records were compiled in the Fauna Management Plan. FSC activities utilised the Riparian Vegetation Decision Tree and Tree Mulching Decision Tree checklists.
		Fauna Spotter wildlife interaction/relocation records demonstrate that species were protected (identified and relocated) prior to traversing riparian areas.	Compliant	Fauna Spotter Catcher (FSC) records were compiled in the Fauna Management Plan, including spatial data and photographs of wildlife interactions.
	No uncontrolled release of treated effluents or greywater.	Inspection records show irrigation is completed by use of dispersion hoses and/or sprinklers within the fenced area on a slope of < 5%.	Compliant	A water register was maintained and daily inspection included site photographs showing irrigation equipment and locations on flat areas.
	No line preparation in riparian zones prior to ground truthing.	Tracklogs show no mulcher used in Tanumbrini Creek restricted area presented in maps	Compliant	Seismic line preparation and acquisition records included maps that show no line preparation was undertaken in riparian zones.

Environmental Outcome	Environmental Performance Standard	Measurement criteria	Compliance Status	Evidence
		Fauna Spotter survey records, including commentary on how decisions were made, demonstrate that riparian areas are ground truthed and trees with a diameter greater than 25 cm at 1.3 m above the ground are voided using the decision tree checklist.	Compliant	Fauna Spotter Catcher (FSC) records were compiled in the Fauna Management Plan. FSC activities utilised the Riparian Vegetation Decision Tree and Tree Mulching Decision Tree checklists and included photo-point data.
	No mulching of trees > 25 cm diameter at 1.3 m above the ground in the path of line preparation without assessment.	Records of completed tree mulching decision tree checklists, including commentary on how decisions to mulch were made, demonstrate consideration for avoidance over mulching every tree with a diameter greater than 25 cm diameter at 1.3 m above the ground.	Compliant	Fauna Spotter Catcher (FSC) records were compiled in the Fauna Management Plan. FSC activities utilised the Riparian Vegetation Decision Tree and Tree Mulching Decision Tree checklists and included photo-point data.
No significant impact on surface water quality parameters or soil from spills or sediment during the conduct of the Activity.	Spills do not result in material or serious environmental harm.	During operations, daily checklists show chemicals, fuels, etc, that are hazardous or have the potential to cause environmental harm are stored within secondary containment in accordance with SDS.	Compliant	Daily compliance checklist confirmed chemical storage areas had suitable bunding.
		Daily inspection checklist shows spill kits available during the Activity are full and suited for the types of chemicals that may spill.	Compliant	Daily compliance checklist confirmed spill kits were present on-site, easily accessible and stocked.
		The Contingency Plan (Emergency Response Plan Appendix 05) Spill Management Plan Section 7.7) is available on-site for an immediate coordinated response to a bogged vehicle or spill scenario.	Compliant	A site spill register was maintained and available on-site.

Environmental Outcome	Environmental Performance Standard	Measurement criteria	Compliance Status	Evidence
	Vehicle movements and mulching does not cause erosion.	Records of inspection during survey demobilisation show areas where vehicles were used for the Activity were inspected to identify and address potential erosion issues.	Compliant	<p>The Riparian Vegetation Decision Tree assessed stability of waterway beds and banks prior to line preparation. Photo monitoring points were established and recorded in the Fauna Management Plan.</p> <p>Survey methodology mitigated erosion risk. An annual rehabilitation assessment was conducted between 05 July 2025 and 15 July 2025 that included inspections for potential erosion issues.</p>
		Annual rehabilitation survey reports show that no active erosion is present in disturbed areas or that corrective actions are being taken to rectify.	Compliant	Annual rehabilitation assessment was conducted between 05 July 2025 and 15 July 2025 that included inspections for potential erosion issues.
		Record of site inspections demonstrate that where there is visible soil disturbance upslope of a water course, a flow diversion bank was installed to re-direct water flow.	Compliant	The Riparian Vegetation Decision Tree assessed stability of waterway beds and banks prior to line preparation. Photo monitoring points were established and recorded in the Fauna Management Plan.
		GPS track logs demonstrate that stream orders along seismic lines are crossed only once (where possible) per activity stage, at 90 degrees and/or existing crossing were used within the working corridor.	Compliant	Spatial data documented details regarding seismic lines in riparian areas.
	Erosion controls in place for seismic lines are in line with the ESC plan.	Annual rehabilitation survey reports completed that cover seismic and connection lines include assessment of erosion and sediment control success measures.	Compliant	Annual rehabilitation assessment was conducted between 05 July 2025 and 15 July 2025 that included assessment of erosion and sediment control success measures where applicable.
	Groundwater use is limited to licenced volume.	Groundwater extraction licence in place.	Compliant	A water register was maintained and water was extracted in compliance with the groundwater extraction licence.
		Groundwater extraction volumes recorded in accordance with licence and less than the maximum permitted volume for the Activity.	Compliant	A water register was maintained and water was extracted in compliance with the groundwater extraction licence.

Environmental Outcome	Environmental Performance Standard	Measurement criteria	Compliance Status	Evidence
Net zero emissions by 2050.	Vehicles used for the Activity are maintained to OEM specifications.	Records of maintenance are available for vehicles, plant, and equipment, showing they are up to date with the activities schedules as per OEM specifications.	Compliant	Records of maintenance were kept for vehicles, plant, and equipment.
		Records for fuel used for the Activity.	Compliant	Fuel receipts were kept for the duration of regulated activities.
Use of land meets the conditions of Land Access Agreements.	No recurring complaints received about noise.	Stakeholder engagement records demonstrate all reasonable noise complaints received were resolved, or if they are unable to be resolved, monitoring demonstrates noise emissions comply with the relevant legislation.	Compliant	Stakeholder engagement records confirm no noise related complaints were received.
	No disruption to pastoral activities based on a misunderstanding of conditions.	Site induction records show all personnel have completed site inductions that cover property access requirements.	Compliant	All personnel completed required inductions in accordance with the Santos Management System.
	No interruption to pastoralists from misdirection on property or speeding.	Site induction records show that clear directions to the campsite have been provided to all staff, contractors, and visitors.	Compliant	All personnel completed required inductions in accordance with the Santos Management System.
		Records of inductions delivered demonstrate that those visiting site have been made aware of speed limits and approved access points.	Compliant	All personnel completed required inductions in accordance with the Santos Management System.
Conditions to protect sacred sites, culture and heritage met during conduct of the Activity.	No disturbance to Aboriginal or Macassan archaeological places or objects, sacred sites, and cultural heritage sites during the Activity.	GIS shape files of seismic lines show that mulching and acquisition activity occurred within the areas shown in AAPA Authority Certificates C2013/142, C2018/105 variation to C2018/102, C2019/043 variation to C2014/053 and C2020/011.	Compliant	Spatial data documented details regarding mulching and acquisition activities.

Environmental Outcome	Environmental Performance Standard	Measurement criteria	Compliance Status	Evidence
		Line preparation and seismic data acquisition GPS log show no vehicles encroached into an AAPA excluded areas.	Compliant	There were no incidents in the Incident Management System relating to speed limits or driving off permitted access tracks.
		Line preparation and seismic data acquisition GPS log show no vehicles encroached on the cultural buffers detailed in <b>Appendix 02</b> Archaeological Assessment.	Compliant	There were no incidents in the Incident Management System relating to speed limits or driving off permitted access tracks.
		Induction records show that civil and seismic personnel have received training on the appropriate actions to take upon discovering Aboriginal or Macassan archaeological places, objects, or sacred sites previously unidentified during their work.	Compliant	All personnel completed required inductions in accordance with the Santos Management System
		Incident records to include any sacred sites discovered during construction or seismic Activity and that they have been reported to the AAPA and the CEO of the Northern Territory Heritage Office as soon as practical.	Compliant	No incidents in the Incident Management System relating to cultural heritage or unexpected finds.
	No indirect impacts on identified sacred sites from and cultural heritage sites during the Activity.	Weather forecast records demonstrate that line 12 stream crossed only in dry conditions.	Compliant	Daily operational toolbox report contains weather and rainfall information.
	No indirect impacts on identified sacred sites from and cultural heritage sites during the Activity.	Meeting records demonstrate that site personnel and contractors are aware of potential indirect impacts to the Sacred Site water hole from crossing streams on line 12.	Compliant	Daily operational toolbox report contained information regarding sacred sites on line 12.

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 of the extents of seismic lines and other ground disturbing activities were supplied to Onshoregas.DLPE@nt.gov.au on 19 December 2024.
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 03 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>	<p>The fire management plan (section 7.3 of approved EMP) makes provision for this requirement of the Code.</p> <p>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.</p> <p>There were no fires in and around the project footprint during the reporting period.</p>
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>	<p>The Rehabilitation Management Plan (section 7.4 of approved EMP) makes provision for this requirement of the code.</p> <p>No rehabilitation activities were conducted during the 2024-2025 reporting period. The rehabilitation assessment conducted between 05 July 2025 and 15 July 2025 will indicate the rehabilitation activities required as part of progressive rehab and ongoing maintenance.</p>
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	<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
		c) typical and maximum concentrations of chemicals or other substances used.		
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 <i>Preliminary Guideline: Groundwater Monitoring Bores for Exploration Petroleum Wells in the Beetaloo Sub-basin</i> .
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 (section 7.5 of approved EMP) and spill management plan (section 7.7 of approved EMP) makes provision for this requirement of the code. A spill register and water register was maintained throughout the duration of regulated activities.
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.	<i>Compliant</i>	The wastewater management plan (section 7.5 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	<i>Not Applicable</i>	No relevant regulated activities were undertaken during the reporting period.

Item No.	Reference	Requirement	Compliance Status	Evidence
		significantly higher-level methane event being detected.		
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>	<p>As detailed in email correspondence from the Department on 9 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.</p> <p>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.</p>
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>	<p>As detailed in email correspondence from the Department on 9 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.</p> <p>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.</p>
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 environmental assessment report and weed management plan 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>	<p>As detailed in email correspondence from the Department on 9 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.</p> <p>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.</p>
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	<i>Compliant</i>	The current EMP remains in force.

Item No.	Reference	Requirement	Compliance Status	Evidence
		met, and the Minister advises the interest holder the notice is accepted and the plan ceases to be 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 04 of approved EMP).
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>Compliant</i>	Notice of intention to conduct works was supplied on the following dates: <ul style="list-style-type: none"> <li>Seismic survey: 10 October 2024 (survey commenced 20 October 2024)</li> <li>Civil works: 8 January 2025 (works commenced 15 January 2025)</li> </ul>
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>Compliant</i>	A recordable incident occurred on 25 October 2024 in the form of an isolated electrical fire in the engine bay of a skid steer caused by a loose bolt on a bracket that supported electrical wiring. The flame was extinguished and the skid steer bolt was re-installed, and inspections were conducted on other equipment to ensure similar issues were not occurring. The incident was contained within the engine bay and did not result in any impacts to personnel or the environment.  A recordable incident report was provided to DITT within 72 hours of the incident occurring on 28 October 2024.
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.

Item No.	Reference	Requirement	Compliance Status	Evidence
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 95 total compliance items.

**Table 5: Compliance Summary**

Compliance Indicator	Number	Percentage
Compliant	72	77%
Not Compliant	5	5%
Not Applicable	17	18%

### 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

A non-compliance was reported for Ministerial Approval Condition 4 in the form of a late submission for the Q1 2025 quarterly report. Ministerial Approval Condition 4 states:

Within five business days of 31 March, 30 June, 30 September and 31 December of each year, the interest holder must submit to Onshoregas.DLPE@nt.gov.au a report with the following information:

- i. regulated activities completed in the previous quarter;
- ii. regulated activities to be conducted in the next quarter, including estimated duration;
- iii. the date any conditions of this approval were completed in the previous quarter;
- iv. the date any conditions of this approval are due for completion in the next quarter; and
- 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.

The quarterly report for Q1 2025 was submitted on 11 April 2025 instead of 08 April 2025 due to an internal software error. The Department notes that the non-compliance was administrative in nature and did not result in any actual or potential environmental harm. The Department acknowledged Santos' corrective actions and cooperation in an email dated 14 May 2025 and closed this non-compliance out with no further enforcement action.

#### 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.