

# **Annual Environmental Performance Report 2021**

## **Water Bore Monitoring Program EP 161**


<b>Date</b>	<b>Rev</b>	<b>Reason for Issue</b>	<b>Author</b>	<b>Checked</b>	<b>Approved</b>
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<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
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<b>Date approved</b>	30 June 2021

## 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)	Angus McIntyre
Position	Manager – Onshore New Ventures
Date	30 June 2021

## Table of Contents

<b>1.0</b>	<b>Introduction.....</b>	<b>1</b>
1.1	Background .....	1
1.2	Contents of Performance Report .....	3
1.3	Assessment of Compliance .....	3
1.4	Evidence of Compliance .....	3
<b>2.0</b>	<b>Demonstration of Compliance .....</b>	<b>4</b>
<b>3.0</b>	<b>Summary of Compliance .....</b>	<b>20</b>
3.1	Overview of Compliance .....	20
3.2	Overview of Items Found Not Compliant or Partially Compliant.....	20
3.2.1	Regulatory Reporting .....	20

## Tables

Table 1	Compliance Descriptors .....	3
Table 2	Compliance with Ministerial EMP Approval Conditions.....	4
Table 3	Compliance with Environmental Outcomes and Environmental Performance Standards Water Bore Monitoring Program .....	5
Table 4	Compliance with Mandatory Reporting Requirement.....	15

## Figures

Figure 1	Location of Regulated Activities .....	2
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## Abbreviations and Units

Acronym / Abbreviation	Description
AEPR	Annual Environmental Performance Report
ALARP	As low as reasonably practicable
AAPA	Aboriginal Areas Protection Authority
Code	Code of Practice
DENR	Department of Environment and Natural Resources
DPIR	Department of Primary Industry and Resources
EMP	Environmental Management Plan
EP	Exploration Permit
ESCP	Erosion and Sediment Control Plan
IVMS	In vehicle monitoring systems
NT	Northern Territory
NT EPA	Northern Territory Environmental Protection Authority
SMS	Santos Management System
SSCC	Sacred Site Clearance Certificate

## 1.0 Introduction

The Petroleum (Environment) Regulations 2016 (NT) 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 Petroleum (Environment) Regulations 2016 (NT) 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 Water Bore Monitoring Program that was approved on 12 December 2018. The period covered by this AEPR is from 12 December 2019 until 11 December 2020.

### 1.1 Background

Santos QNT Pty Ltd (Santos) is the operator of EP 161. Santos submitted the *Water Bore Monitoring Program EP 161 EMP, Revision 5, Nov 2018* (EMP 2018-2) under the *Petroleum (Environment) Regulations (PER)* that came into force 6 July 2016. EMP 2018-2 was submitted to cover the following scope:

- Construction of a 50m x 50m drill pad at each of the Tanumbirini South, Inacumba North and Inacumba South locations
- Installation of groundwater monitoring bores
- Upgrade of up to 6.3 kilometres of seismic lines and fence lines for access
- Construction of 550m of new track

EMP 2018-2 was approved on 12 December 2018, conditional on the installation of the groundwater bores being completed within one year and being drilled by a licenced driller. This is the second AEPR for the relevant EMP. It has been prepared to report on activities that have occurred under EMP between 12 December 2019 and 11 December 2020. No regulated activities occurred during the reporting period.

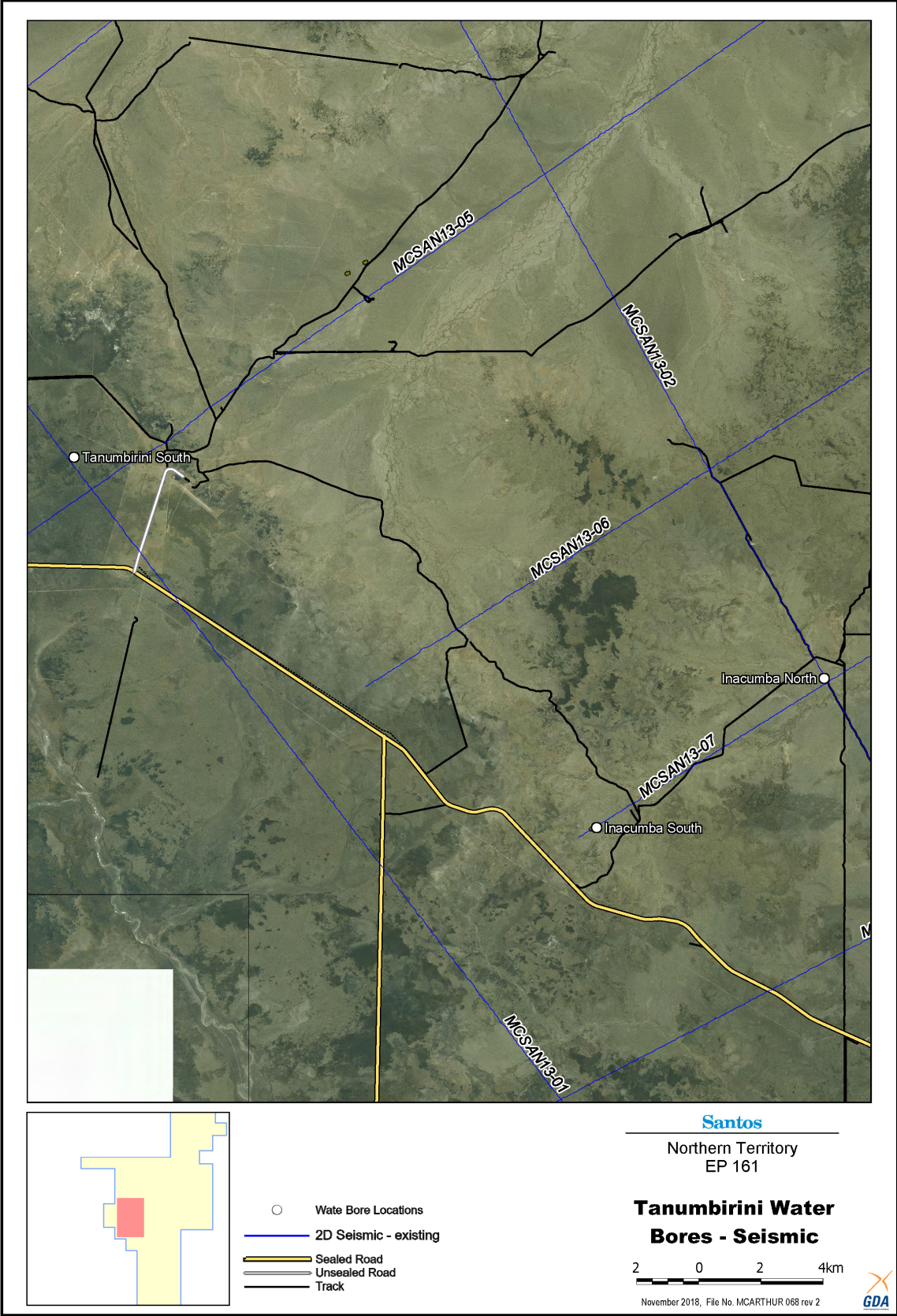


Figure 1 Location of Regulated Activities

## 1.2 Contents of Performance Report

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

1. Compliance with Ministerial approval conditions for each EMP.
2. Compliance with each environmental outcome and environmental performance standard within the EMP 2018-2.
3. Compliance with reporting requirements in accordance with the Code and Regulations.
4. All recordable and reportable incidents, including root cause analysis and related corrective actions to prevent re-occurrence.
5. 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 entire 12 month reporting period
Partially Compliant	Compliant with requirement for most of year, short periods of non-compliance
Not Compliant	Interest holder did not comply 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:

1. Internal tracking of compliance by Santos through:
  - Internal annual audits of compliance, as follows:
    - i. Daily checklists
    - ii. Induction registers
    - iii. Stakeholder engagement register
2. Outcomes from regulatory inspections conducted by the Department of Environment and Natural Resources (DENR), Petroleum Operations.
3. Recordable and reportable incident reports submitted to DENR Petroleum Operations
4. Reports provided to DENR, the Department of Primary Industry and Resources (DPIR) and other government agencies.



## 2.0 Demonstration of Compliance

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

**Table 2 Compliance with Ministerial EMP Approval Conditions**

No	Ministerial Condition	Compliance Status	Evidence
1	The approval is subject to the following conditions: <ul style="list-style-type: none"> <li>a. Water monitoring bores will be drilled and constructed by a water bore driller licensed under the <i>Water Act</i> and in accordance with the current version of the <i>Minimum Construction Requirements for water bores in Australia</i>.</li> </ul>	Not Applicable	No regulated activities occurred during the reporting period.
	<ul style="list-style-type: none"> <li>b. The groundwater bore installation must be completed within 12 months from the date of this approval.</li> </ul>	Not Applicable	No regulated activities occurred during the reporting period.

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

**Table 3 Compliance with Environmental Outcomes and Environmental Performance Standards Water Bore Monitoring Program**

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
1	Minimise disturbance to native flora	All personnel are given environmental and cultural heritage inductions prior to commencing work. Inductions for all employees and contractors cover pastoral, conservation, legislation and infrastructure issues.	Compliant	Induction records show that all personnel collecting water samples were given environmental and cultural heritage inductions.
2		Activities to be planned to minimise new land disturbance by utilising previous disturbed areas or existing tracks (where possible), and through operational practices including weaving.	Not Applicable	No regulated activities occurred during the reporting period.
3		Preference to use previously disturbed areas. Where possible, existing tracks, roads or seismic lines will be used for access.	Not Applicable	No regulated activities occurred during the reporting period.
4		Mature trees selected for preservation are to be flagged to ensure their protection	Not Applicable	No regulated activities occurred during the reporting period.
5		Cleared vegetation will be respread during rehabilitation	Not Applicable	No regulated activities occurred during the reporting period.
6		Hollow timber/trees that may be nesting/roosting sites for fauna will not be cleared.	Not Applicable	No regulated activities occurred during the reporting period.
7		Branches will be pruned in preference to total tree removal	Not Applicable	No regulated activities occurred during the reporting period.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
8	Minimise disturbance to native fauna	Clearing of vegetation for track upgrades will be restricted to the minimum clearing required for the all-terrain water bore drill rig.	Not Applicable	No regulated activities occurred during the reporting period.
9		Flora rootstock will be left intact to promote regeneration.	Not Applicable	No regulated activities occurred during the reporting period.
10		Steep terrain will be avoided (where possible).	Not Applicable	No regulated activities occurred during the reporting period.
11		Hollow timber/trees selected for preservation are to be flagged to ensure their protection	Not Applicable	No regulated activities occurred during the reporting period.
12	Minimise disturbance to natural drainage patterns	Alteration of natural drainage contours or lines will be avoided	Not Applicable	No regulated activities occurred during the reporting period.
13	Minimise disturbance of soil resources	An all-terrain water bore drill rig will be used.	Not Applicable	No regulated activities occurred during the reporting period.
14		Alteration of natural drainage contours or lines will be avoided and/or bypass structures installed to minimise obstruction to flow	Not Applicable	No regulated activities occurred during the reporting period.
15		Erosion and sediment control structures (e.g. berms, sediment fences) to be installed and maintained where necessary	Compliant	. No erosion and sediment control structures required maintenance and no erosion was observed or reported during the reporting period.
16		Inversion of the soil profile will be minimised where possible	Not Applicable	No regulated activities occurred during the reporting period.
17		Disturbance is restricted to areas for which NLC clearance has been provided.	Not Applicable	No regulated activities occurred during the reporting period.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Disturbance is restricted to subject land as detailed in the AAPA Authority Certificate.		
18	Avoid disturbance to sites of cultural, sacred and heritage significance	Known sites of sacred or cultural significance are identified and avoided.	Not Applicable	No regulated activities occurred during the reporting period.
19		Any new sites identified during the activity will be reported to the Santos Cultural Heritage Team and avoided.	Not Applicable	No regulated activities occurred during the reporting period.
20		Maintain GIS database of project footprint and cultural heritage sites including details of any works conditions.	Compliant	Maintained a GIS database that includes project areas and cultural heritage sites. This database is continually updated. Last update in EP 161 was 30 March 2021.
21	Minimise disturbance to livestock, pastoral infrastructure and landholders.	Relevant landowners and occupiers and relevant third-party tenement holders are notified prior to activity.	Not Applicable	No regulated activities occurred during the reporting period.
22		All gates are left in the condition in which they were found (i.e. open / closed).	Not Applicable	No regulated activities occurred during the reporting period.
23		Damage to station tracks is avoided and reported if does occur.	Not Applicable	No regulated activities occurred during the reporting period.
24		Unauthorised offline driving is prohibited for all project personnel.	Not Applicable	No regulated activities occurred during the reporting period.
25		When necessary, all fences are restored to satisfaction of landowner / managers.	Not Applicable	No regulated activities occurred during the reporting period.
26		System is in place for logging landholder complaints to ensure that issues are addressed as appropriate.	Compliant	Landholder consultation logs include a system for logging landholder complaints.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
27	Minimise reduction in air quality Minimise smothering of undisturbed vegetation Minimise disturbance to fauna Minimise loss of amenity Minimise disturbance to native fauna, landholders and livestock	Personnel are given environmental and cultural heritage inductions prior to commencing work	Compliant	Induction records show that all personnel collecting water samples were given environmental and cultural heritage inductions.
28		Where possible, existing tracks, roads or seismic lines will be used for access.	Compliant	Only existing tracks and seismic lines (Figure 1) were used during groundwater monitoring events.
29		Off track driving is prohibited – no bush bashing or short cuts are permitted.	Not Applicable	No regulated activities occurred during the reporting period.
30		Speeds on unsealed roads will be limited – max 80 km/hr on unsealed roads, 40 km/hr on water bore access tracks and seismic lines.	Not Applicable	No regulated activities occurred during the reporting period.
31		Any remediation work should be undertaken upon completion of all activities.	Not Applicable	No regulated activities occurred during the reporting period.
32		Relevant landholders and occupiers are consulted with respect to water bore locations.	Not Applicable	No regulated activities occurred during the reporting period.
33	Minimise disturbance to native fauna, landholders and livestock	Landholders are provided updates on progress throughout the project (both water monitoring bore drilling and groundwater monitoring events).	Compliant	Stakeholder engagement log shows that landholders were provided updates on the groundwater monitoring events. A notice of entry provided to the landholder prior to conducting groundwater monitoring events.
34		Maintain communications during operations with relevant landholders.	Not Applicable	No regulated activities occurred during the reporting period.
35		Water bore drilling will only occur during daylight hours.	Not Applicable	No regulated activities occurred during the reporting period.
36		Driving will only occur during daylight hours.	Not Applicable	No regulated activities occurred during the reporting period.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
37		Off line driving is banned – no bush bashing or short cuts are permitted.	Not Applicable	No regulated activities occurred during the reporting period.
38		Relevant landowners and occupiers are notified prior undertaking activities.	Not Applicable	No regulated activities occurred during the reporting period.
39		All gates are left in the condition in which they were found (i.e. open / closed).	Not Applicable	No regulated activities occurred during the reporting period.
40		When necessary, all fences are restored to satisfaction of landowner / managers.	Not Applicable	No regulated activities occurred during the reporting period.
41		Speed will be limited along lines to 40km/hr and 80km/hr on other unsealed roads.	Not Applicable	No regulated activities occurred during the reporting period.
42		All vehicle routes have speed limits set which must be adhered to.	Not Applicable	No regulated activities occurred during the reporting period.
43	Minimise disturbance of soil resources	Disturbance is restricted to areas for which consent has been provided.	Not Applicable	No regulated activities occurred during the reporting period.
44	Minimise disturbance to drainage patterns of surface waters and shallow groundwater resources,	Where possible, existing tracks, roads or seismic lines will be used for access.	Compliant	Only existing tracks and seismic lines (Figure 1) were used during groundwater monitoring events.
45	Minimise disturbance to native vegetation and native fauna,	Due to the instability and erosion potential when disturbed, the steeper slopes and escarpments of tableland land systems are avoided.	Not Applicable	No regulated activities occurred during the reporting period.
46	Minimise disturbance to culturally sensitive sites,	Creek bank vegetation is left intact and detours sought if too dense to pass through.	Not Applicable	No regulated activities occurred during the reporting period.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
47	Minimise disturbance to livestock, pastoral infrastructure and landholders	Unavoidable compaction in areas other than those susceptible to erosion, will be ripped on completion of work.	Not Applicable	No regulated activities occurred during the reporting period.
48		Any remediation work should be undertaken upon completion of all activities.	Not Applicable	No regulated activities occurred during the reporting period.
49		A Primary Erosion and Sediment Control (ESC) Plan will be developed in consultation with DENR. Once finalised the ESC Plan will be implemented.	Not Applicable	No regulated activities occurred during the reporting period.
50		Unauthorised offline driving is prohibited for all project personnel.	Not Applicable	No regulated activities occurred during the reporting period.
51		Operations are shut down during wet weather or flooding and only restarted once potential for extensive damage has passed.	Not Applicable	No regulated activities occurred during the reporting period.
52		Following shut down due to flooding or inundation the risk assessment will be re-visited to ensure controls are still appropriate to manage risk to ALARP.	Not Applicable	No regulated activities occurred during the reporting period.
53	Minimise disturbance to native fauna	Weed wash-down certification for vehicle and machinery from interstate.	Not Applicable	No regulated activities occurred during the reporting period.
54	Minimise disturbance to native flora Minimise negative impacts to soil quality	Ensure site environmental inductions for all site personnel and contractors include vehicle weed hygiene requirements and information on exotic invasive ants.	Compliant	Induction records show that all personnel collecting water samples were given environmental inductions. Inductions include requirements for weeds and pests.
55	Minimise disturbance to livestock	All vehicle and equipment movements to stay on formed access tracks and seismic lines.	Compliant	Only existing tracks and seismic lines (Figure 1) were used during groundwater monitoring events.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
56	Minimise disturbance to native fauna	Ensure vehicles, machinery and equipment entering the permit areas have been cleaned and are free of soil and vegetative matter, or have a valid weed hygiene certificate.	Compliant	Records show that vehicles used during groundwater monitoring events had a valid weed hygiene certificate.
57		<p>A baseline weed assessment will be completed prior the commencement of works covered in this EMP.</p> <p>Baseline data will be collected in consultation with the Department of Environment and Natural Resources (DENR) and data will be provided to DENR in a format to be specified by them.</p> <p>Areas of priority weeds identified will be marked</p>	Not Applicable	No regulated activities occurred during the reporting period.
58		If infestations of priority weed species are identified during water monitoring bore drilling program, they will be avoided, where possible, via a detour around the infestation.	Not Applicable	No regulated activities occurred during the reporting period.
59		If infestations are unavoidable, infestations will be crossed at the narrowest point and wash downs will be conducted once exiting the infestation.	Not Applicable	No regulated activities occurred during the reporting period.
60		Any onsite wash down sites will be marked for further monitoring.	Not Applicable	No regulated activities occurred during the reporting period.
61		Undertake post-activity weed assessment and monitoring.	Not Applicable	No regulated activities occurred during the reporting period.
62		Include fire season education as part of the induction.	Compliant	Records show that all personnel collecting water samples provided a JHA that includes fire specific



No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	Minimise disturbance to native flora			control measures for each groundwater monitoring event.
63	Minimise negative impacts to landholders	Use of qualified water bore driller contractors with Northern Territory dry season experience	Not Applicable	No regulated activities occurred during the reporting period.
64	Minimise disturbance to livestock	All vehicles will be equipped with portable fire extinguishers	Not Applicable	No regulated activities occurred during the reporting period.
65		Machinery and vehicles should be parked in areas of low fire risk and be free of any combustible material, for example in the case of dry grass build up.	Not Applicable	No regulated activities occurred during the reporting period.
66		All vehicles will be equipped with fully operational VHF and / or UHF radio transceivers.	Not Applicable	No regulated activities occurred during the reporting period.
67		Smoking will only be permitted in areas clear of vegetation, and there will be no disposal of butts.	Not Applicable	No regulated activities occurred during the reporting period.
68		<p>All personnel will receive information prior to the commencement of the activity relating to:</p> <ul style="list-style-type: none"> <li>Provisions of the Emergency Response Plan including procedures during a fire emergency</li> <li>The operation of firefighting equipment and communications</li> </ul> <p>Restricted smoking requirements</p>	Not Applicable	No regulated activities occurred during the reporting period.
69		Toolbox meetings will be conducted to:	Not Applicable	No regulated activities occurred during the reporting period.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		<ul style="list-style-type: none"> <li>Alert the workforce of the fire risk level for the day</li> </ul> Discuss any fire risk management breaches and remedial actions		
70	No unplanned interactions or disturbance to landholders	Damage and degradation of station tracks is avoided	Not Applicable	No regulated activities occurred during the reporting period.
71		Inductions for all employees and contractors cover pastoral, conservation, legislation and infrastructure issues.	Compliant	Induction records show that all personnel collecting water samples were given environmental and cultural heritage inductions covering pastoral, conservation, legislation and infrastructure.
72		All litter is to be managed and disposed of correctly.	Not Applicable	No regulated activities occurred during the reporting period.
73		Speeds on private unsealed roads will be limited to a maximum of 80 km/hr	Not Applicable	No regulated activities occurred during the reporting period.
74		Licensed waste contractor will be used where appropriate.	Not Applicable	No regulated activities occurred during the reporting period.
75		Water bore drilling will be conducted by a licenced contractor	Not Applicable	No regulated activities occurred during the reporting period.
76		Spill kits available to treat spills in situ	Not Applicable	No regulated activities occurred during the reporting period.
77	Water bore drilling will be conducted in accordance with the Minimum Construction Requirements for Water Bores in Australia (3rd edition)	Not Applicable	No regulated activities occurred during the reporting period.	

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
78		All fuel stored and used should be under the control of qualified or trained personnel.	Not Applicable	No regulated activities occurred during the reporting period.
79		Waste will be segregated on site and all putrescible waste material will be held in fauna proof containers.	Not Applicable	No regulated activities occurred during the reporting period.
80		Any spills contained and retrieved.	Not Applicable	No regulated activities occurred during the reporting period.
81		Any spills will be remediated to the satisfaction of the landholder, fenced, soil removed to appropriate facility and signed off by land holder in accordance with the access.	Not Applicable	No regulated activities occurred during the reporting period.
82		Fuel and other lubricants will be appropriately stored and managed, in accordance with AS1940 The Storage and Handling of Flammable and Combustible Liquids.	Not Applicable	No regulated activities occurred during the reporting period.

Table 4 demonstrates Santos' 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 Requirement**

No	Reference	Requirement	Compliance Status	Evidence
1	Code cl A.3.5	Geospatial information depicting areas cleared is to be provided to the Minister.	Not Applicable	Not applicable, approved prior to Code being incorporated into Regulations
2	Code cl A.3.6 (b)	Weed management plan developed as part of the EMP must provide for ongoing weed monitoring.	Not Applicable	Not applicable, approved prior to Code being incorporated into Regulations
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.	Not Applicable	Not applicable, approved prior to Code being incorporated into Regulations
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.	Not Applicable	Not applicable, approved prior to Code being incorporated into Regulations
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.	Not Applicable	Not applicable, approved prior to Code being incorporated into Regulations

No	Reference	Requirement	Compliance Status	Evidence
6	Code cl B.4.13.2(k)iv	Where venting is the only technically feasible option for managing produced gas, the technical considerations preventing the use of the recovered gas must be recorded and included in the operator's annual report.	Not Applicable	Not applicable, approved prior to Code being incorporated into Regulations
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.	Not Applicable	Not applicable, approved prior to Code being incorporated into Regulations
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.	Not Applicable	Not applicable, approved prior to Code being incorporated into Regulations
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.	Not Applicable	Not applicable, approved prior to Code being incorporated into Regulations
10	Code cl C.3(e)	The components of the wastewater management framework, include: Monitor, manage and report in accordance with the Wastewater Management Plan and Spill Management Plan.	Not Applicable	Not applicable, approved prior to Code being incorporated into Regulations
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	Not Applicable	Not applicable, approved prior to Code being incorporated into Regulations
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	Not Applicable	Not applicable, approved prior to Code being incorporated into Regulations

No	Reference	Requirement	Compliance Status	Evidence
		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.	Not Applicable	Not applicable, approved prior to Code being incorporated into Regulations
14	Code cl D.5.9.2(c)	Emissions from exploration, well construction (including during flow back) and workovers must be measured and reports submitted.	Not Applicable	Not applicable, approved prior to Code being incorporated into Regulations
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.	Not Applicable	Not applicable, approved prior to Code being incorporated into Regulations
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.	Not Applicable	Not applicable, approved prior to Code being incorporated into Regulations
17	Code cl D.6.2(a)	Reports of baseline assessments must be submitted at the conclusion of each field campaign.	Not Applicable	Not applicable, approved prior to Code being incorporated into Regulations
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.	Not Applicable	Not applicable, approved prior to Code being incorporated into Regulations
19	Reg 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	Compliant	The current EMP remains in force.

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	EMP s 9.1 Ongoing Consultation Schedule 1, item 9(2)	Interest holders are required to conduct future engagement with stakeholders, in accordance with the description in the EMP.	Compliant	Stakeholder engagement logs indicate that engagement with stakeholders has been undertaken.
21	EMP Section 8.6 Incident Reporting Reg 33	DENR 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.	Not Applicable	There were no reportable incidents during this period.
22	EMP Section 8.6 Incident Reporting Reg 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/clean-up of the affected area.	Not Applicable	There were no reportable incidents during this period.
23	EMP Section 8.6 Incident Reporting Reg 35	A written report of all recordable incidents must be provided to DENR not later than 15 days after the 90 day reporting period (unless otherwise agreed).	Partially Compliant	Reports on all recordable incidents were provided: <ul style="list-style-type: none"> <li>• 1<sup>st</sup> report provided 23/03/2020 (Met timeframes)</li> <li>• 2<sup>nd</sup> report provided 23/06/2020 (Met timeframes)</li> <li>• 3<sup>rd</sup> report provided 29/09/2020 (Six days late)</li> <li>• 4<sup>th</sup> report provided 15/12/2020 (Met timeframes)</li> </ul>
24	Reg 37A	A report about flow back fluid from hydraulic fracturing must be provided to the Minister within 6 months of the flow back occurring.	Not Applicable	No regulated activities occurred during the reporting period.

No	Reference	Requirement	Compliance Status	Evidence
25	Reg 37B	A report about produced water from hydraulic fracturing must be provided to the Minister within 6 months of the produced water being extracted.	Not Applicable	No regulated activities occurred during the reporting period.
26	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 <b>before</b> commencement of activity.	Not Applicable	No regulated activities occurred during the reporting period.



### 3.0 Summary of Compliance

#### 3.1 Overview of Compliance

Table 5 provides a summary of the results of the compliance assessment against the 110 total compliance items.

**Table 5: Compliance Summary**

Compliance Indicator	Number	Percentage
Compliant	15	13.6
Partially Compliant	1	0.1
Not Compliant	0	0
Not Applicable	94	85.5

#### 3.2 Overview of Items Found Not Compliant or Partially Compliant

The following sections describe:

- the specific compliance requirements not met for the reporting period
- an analysis of the possible potential environmental harm or impact to environmental values resulting from non-compliance or partial compliance, using multiple lines of evidence
- a summary of the corrective actions already implemented, and further actions still required, as applicable, to ensure compliance is fully achieved in the future.

##### 3.2.1 Regulatory Reporting

###### 3.2.1.1 Description

Recordable Incidents Summary Reports were not lodged within 15 days of the reporting period.

###### 3.2.1.2 Analysis of Potential Environmental Harm or Impact

There was no potential for environmental harm or impact. There were no regulated activities conducted under this EMP

###### 3.2.1.3 Corrective Actions

Santos will submit recordable incident reports for this EMP at 90 day intervals as required. The requirements to submit these recordable incident reports for this EMP has been added to Santos' compliance tracking system.