

Annual Environmental Performance Report 2022

McArthur Basin Drilling Program EP 161

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EMPs Covered	McArthur Basin Drilling Program (STO 2-7) (Ref: NTEPA2020/0116-007~0006)
Permit	EP 161
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Date approved	20 May 2022

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)	Matt Densley
Position	General Manager Regional and New Ventures
Date	20 May 2022

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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
DITT	Department of Industry, Tourism and Trade
EMP	Environmental Management Plan
EP	Exploration Permit
NT	Northern Territory
NT EPA	Northern Territory Environmental Protection Authority
Regulations	Petroleum (Environment) Regulations 2016

1.0 Introduction

The *Petroleum (Environment) Regulations 2016* (Regulations) 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 Regulations 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 McArthur Basin Drilling Program that was approved on 21 February 2021. The period covered by this AEPR is from 21 February 2021 until 20 February 2022.

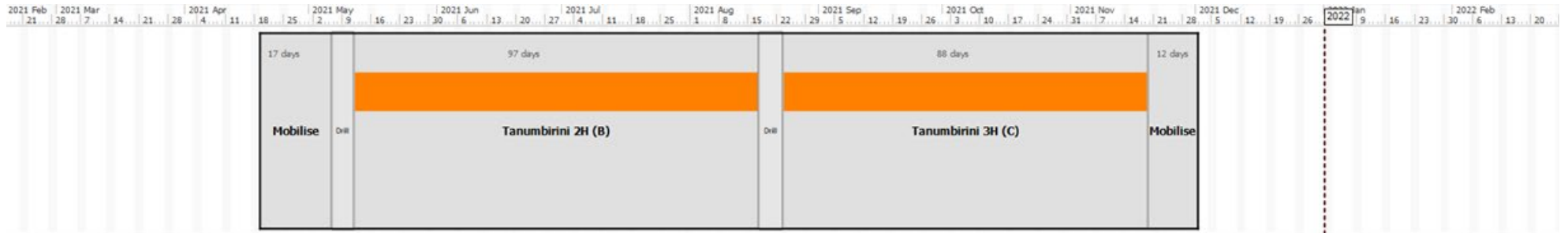


Figure 1 Timing of Regulated Activities Conducted During the Reporting Period

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 *Petroleum (Environment) Regulations 2016* that came into force 11 June 2019. EMP 2021 was submitted for 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

EMP 2021 was approved on 21 February 2021. This AEPR has been prepared to report on regulated activities that have occurred under EMP 2021 between 21 February 2021 and 20 February 2022.

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 the EMP.
2. Compliance with each environmental outcome and environmental performance standard within the approved EMP.
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
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 monitoring of compliance by Santos through internal audits of compliance and reporting including incident reporting.
2. Outcomes from regulatory inspections conducted by the Department of Environment, Parks and Water Security (DEPWS), Petroleum Operations.
3. Recordable and reportable incident reports submitted to DEPWS Petroleum Operations.
4. Reports provided to DEPWS, the Department of Industry Tourism and Trade (DITT) 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	<p>Condition 1: The interest holder must submit to the Department of Environment, Parks and Water Security (DEPWS), via Onshoregas.DEPWS@nt.gov.au:</p> <p>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:</p> <ul style="list-style-type: none"> • time-bound commitments in the EMP • due dates for satisfaction of Ministerial approval conditions 	Compliant	<p>Timetables were provided prior to the commencement of the activity and then quarterly during the duration of the activity.</p> <p>Prior to commencement of the activity Q2/Q3 – 23 April 2021</p> <p>Q3/Q4 – 11 August 2021</p> <p>Q4 to end of 2021 – 29 October 2021</p>

No	Ministerial Condition	Compliance Status	Evidence
	<ul style="list-style-type: none"> • due dates for regulatory reporting; and ii. during drilling, daily on-site reports indicating: <ul style="list-style-type: none"> • the status and progress of drilling; • the freeboard available in drilling sumps (in cm); • notification of any halt to the activity due to wet season conditions; • notification of any fires potentially threatening the activity from external or internal sources; and iii. during non-operational periods in the wet season, weekly reports on the freeboard available in drilling sumps (in cm); and iv. a seven-day activity forecast for the duration of the activity during the wet season (1 October - 30 April each year); and 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. 		<p>Daily onsite reports were provided to DEPWS during drilling operations.</p> <p>Reports including freeboard in the sumps were provided throughout the wet season.</p> <p>A 7 day activity forecast was provided for the duration of the regulated activity throughout the wet season.</p> <p>Weekly reports were provided to DEPWS during drilling operations.</p>

No	Ministerial Condition	Compliance Status	Evidence
2	<p>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:</p> <ul style="list-style-type: none"> 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 ii. within 14 days of the incident, provide a written report detailing: <ul style="list-style-type: none"> 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. 	Not applicable	There were no accidental releases of contaminants exceeding 200 litres.
3	<p>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.</p>	Compliant	This Annual Environmental Performance Report.
4	<p>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.</p>	Compliant	The emissions report was provided to DEPWS on 30 September 2021.
5	<p>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.</p>	Compliant	The cementing reports were submitted to DEPWS on 25 May 2021 for Tanumbirini-2H and on 1 September 2021 for Tanumbirini-3H.

No	Ministerial Condition	Compliance Status	Evidence
6	<p>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:</p> <ul style="list-style-type: none"> 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; 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 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. 	Compliant	<p>Groundwater monitoring was provided to DEPWS on the following dates:</p> <ul style="list-style-type: none"> 28 April 2021 23 July 2021 1 November 2021 14 January 2022
7	<p>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:</p>	Not applicable	Not required within the reporting period.

No	Ministerial Condition	Compliance Status	Evidence
	<ul style="list-style-type: none"> i. demonstration that there is no change to groundwater quality or level attributable to conduct of the regulated activity at the well site(s); ii. interpretation of any statistical outliers observed from baseline measured values for each of the analytes; iii. discussion of any trends observed; and v. a summary of the results inclusive of descriptive statistics. 		
8	<p>Condition 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 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> <ul style="list-style-type: none"> i. provides the outcome of assessment and leachability testing of residual drill fluids and drill cuttings; and ii. provides the recommended disposal option. 	Not applicable	The drilling program is not yet complete.

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 McArthur Basin 2019 Drilling Program

No	Environmental Outcome	Environmental Performance Standard	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.	<p>Injury and disturbance to threatened fauna during the conduct of the activity will be minimised.</p> <p>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.</p> <p>No introduction of new species of weeds or plant pathogens, or increase in abundance of existing weed species, as a result of project activities.</p> <p>No fire in EP161 as a result of conduct of the regulated activity.</p>	Compliant	<p>Site induction records show all personnel have completed site inductions, which includes requirements for managing impacts to terrestrial fauna.</p> <p>There were no incidents in the Incident Management System relating to speed limits or driving off permitted access tracks.</p> <p>Daily checklist shows all domestic waste receptacles have lids secured.</p> <p>Daily checklist shows inspection of fences, excavations, pits, storages for entrapped fauna and fauna escapes intact.</p> <p>Daily checklist shows lighting at the camp inward-facing, adequate for safe operations.</p> <p>Daily checklist shows assessment of fire weather during dry season, and all site personnel notified of fire risk.</p> <p>Post wet season weed survey showed no increase in abundance of existing weed species.</p>
2	No significant impact to the quality and integrity of land and soils resulting from conduct of the regulated activity	<p>No unauthorised physical disturbance to soil.</p> <p>No releases of contaminants (wastes, wastewater, chemicals, hydrocarbons or drilling fluids) resulting in long-term contamination of the soil</p>	Compliant	<p>Site induction records show all personnel have completed site inductions, which includes requirements for managing impacts to land and soil.</p> <p>There were no incidents in the Incident Management System relating to speed limits or driving off permitted access tracks.</p>

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
				<p>Records show only waste from approved wastewater systems and grey water disposed of to land.</p> <p>Weekly inspection checklists confirm all hazardous materials and stored and managed in accordance with the EMP, the Code of practice and the WOMP.</p> <p>Records of spills and completed remediation in the Santos Incident Management System.</p> <p>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.</p>
3	No significant impact on Inland environmental water quality resulting from conduct of the regulated activity	<p>No releases of contaminants (wastes, wastewater, chemicals, hydrocarbons or drilling fluids) resulting in long-term contamination of the waters.</p> <p>No reduction to groundwater resource availability in the area as a result of project activities.</p>	Compliant	<p>Records show drilling fluids and wastewater stored in lined tanks and lined pits.</p> <p>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.</p> <p>Well acceptance criteria met.</p> <p>Well control monitoring demonstrates adequate well control.</p> <p>Records of spills and completed remediation in the Incident Management System.</p> <p>Daily and weekly inspection checklist confirms no releases resulting in contamination of water .</p>
4	No significant impact on air quality and minimise emissions (including greenhouse gas emissions) and their impact so that environmental values are maintained.	<p>No reduction in air quality as a result of project activities.</p> <p>Minimise greenhouse gas emissions resultant from project activities.</p>	Compliant	<p>Actual emissions were reported to DEPWS on 30 September 2021 in accordance with NGERs.</p> <p>Two Leak Detection and Repair surveys undertaken on 21 October 2021 and 28 January 2022, no leaks requiring repair were identified.</p>

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
5	No impact on the health of the Northern Territory population			Audit records demonstrate vehicles compliant with Northern Territory Motor Vehicle registry regulation and work health and safety regulations.
		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.	Compliant	<p>Site induction records show all personnel have completed site inductions.</p> <p>There were no incidents in the Incident Management System relating to speed limits or driving off permitted access tracks.</p> <p>Stakeholder engagement records show no complaints were received regarding dust.</p>
6	Minimise negative impact to communities and enhance the economy	<p>Noise complaints from vehicle movements and drilling activities associate with the project are minimised. Amicable resolution of complaints.</p> <p>Disturbance, injury or death to livestock from vehicle movements and drilling activities minimised through active stakeholder engagement.</p> <p>Disturbance to landholders from vehicle movements and drilling activities minimised. Amicable resolution of complaints.</p>	Compliant	<p>Site induction records show all personnel have completed site inductions.</p> <p>Daily inspection records show fences are intact, gates are left in the condition in which they were found and no livestock entrapment.</p> <p>Stakeholder engagement records show notification prior to the commencement of activities.</p> <p>Stakeholder engagement records show no complaints were received regarding dust.</p>
7	Protect sacred sites, culture and heritage.	No impact to sacred sites, culture and heritage.	Compliant	<p>Audit records show that all activities including horizontal drilling occur within the areas shown in AAPA Authority Certificate C2019/043.</p> <p>Maintained a GIS database that includes project areas and cultural heritage sites. This database is updated when additional information is available. This data set in EP 161 was updated January 2022.</p>

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 Requirements

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	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.	Compliant	<p>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.</p> <p>The post-wet annual weed monitoring was undertaken 25 and 26 May 2021, and further survey with DEPWS Weed Management Officer on 27 May 2021. A report was provided to the DEPWS Weed Management Officer on 2 September 2021.</p>
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.	Compliant	<p>Fire management plan, section 7.2 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	Not Applicable	The Rehabilitation Management Plan, section 7.3 of approved EMP makes provision for this requirement of the code.

No	Reference	Requirement	Compliance Status	Evidence
		on the land. It also requires regular maintenance and annual monitoring of rehabilitated areas.		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.	Not Applicable	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.	Not Applicable	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.	Not Applicable	WBIV report submitted to DITT as per schedule outlined in the Well Acceptance Criteria
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	Not Applicable	The regulated activity conducted during the reporting period did not include any aspects of decommissioning for the reporting period.

No	Reference	Requirement	Compliance Status	Evidence
		of the legislative reporting requirements for the decommissioning of petroleum wells.		
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.	Compliant	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(e)	The components of the wastewater management framework, include: Monitor, manage and report in accordance with the Wastewater Management Plan and Spill Management Plan.	Compliant	The wastewater management plan, Appendix G and spill management plan Appendix H, of the approved EMP makes provision for this requirement of the code. Various daily and weekly inspection reports provided to DEPWS provide outcomes of the routine inspections on wastewater tanks, secondary containment and wastewater storage levels and volumes implemented onsite.
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	The regulated activity conducted during the reporting period did not remove wastewater. There is no tracking documentation.
12	Code cl C.7.1(d)ii	Wastewater Management Plan must include a program for monitoring and reporting against the effectiveness of the measures for the mitigation of interaction with wildlife, stock and human receptors with wastewater.	Compliant	The wastewater management plan, Appendix G of the 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	Not Applicable	There were no unusual readings of methane detected.

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.	Compliant	The emissions report was provided to DEPWS on 30 September 2021.
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	The regulated activity did not include a gas processing or downstream facility.
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	As there was no detectable leaks or emissions generated during the activities conducted under this EMP, the reporting under the Code cl D.6.1 is not required.
17	Code cl D.6.2(a)	Reports of baseline assessments must be submitted at the conclusion of each field campaign.	Compliant	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.	Compliant	The emissions report was provided to DEPWS on 30 September 2021.
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 met, and the Minister advises the interest holder	Compliant	The current EMP remains in force.

No	Reference	Requirement	Compliance Status	Evidence
		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.	Compliant	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.	Compliant	Santos notified the Minister on 18 March 2021 and notified the Pastoralist on 9 April 2021.
22	EMP Section 8.8 Incident Reporting Reg 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.	Not Applicable	There were no reportable incidents during this period.
23	EMP Section 8.8 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/cleanup of the affected area.	Not Applicable	There were no reportable incidents during this period.

No	Reference	Requirement	Compliance Status	Evidence
23	EMP Section 8.8 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).	Compliant	Reports on all recordable incidents were provided: <ul style="list-style-type: none"> • Q1 2021 report provided 14 April 2021 • Q2 2021 report provided 14 July 2021 • Q3 2021 report provided 14 October 2021 • Q4 2021 report provided 17 January 2021 (report due on a Saturday, report provided next working day) • Q1 2022 report provided 14 April 2022
24	Reg 37A	A report about flowback fluid from hydraulic fracturing must be provided to the Minister within 6 months of the flowback occurring.	Not Applicable	The regulated activity did not include flowback.
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	The regulated activity did not include produced water.
26	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	Not Applicable	No incidents which could cause or threaten to cause material or significant environmental harm occurred during reporting period.

No	Reference	Requirement	Compliance Status	Evidence
27	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.	Not Applicable	No incidents which could cause or threaten to cause material or significant environmental harm occurred during 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 64 total compliance items.

Table 5: Compliance Summary

Compliance Indicator	Number	Percentage
Compliant	23	55%
Not Compliant	0	N/A
Not Applicable	19	45%

3.2 Overview of Items Found Not Compliant or Partially Compliant

3.2.1 Ministerial Approval Conditions

Not applicable: compliant with Ministerial approval conditions.

3.2.2 Environmental Performance Standards

Not applicable: compliant with environmental performance standards.

3.2.3 Regulatory Reporting

Not applicable: compliant with regulatory reporting standards.

3.3 Application of Lessons Learned Across Santos' Onshore Interests

Contractors that engage third party transporters are to ensure that all vehicles comply with inspection and declaration procedures before entering EP161. Recordable incidents during the reporting period were very low consequence, and the regulated activity complied with environmental performance standards.