

Annual Environmental Performance Report 2021

McArthur Basin Civil and Seismic Program

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EMPs Covered	McArthur Basin Civil and Seismic Program EMP, May 2019
Permit	EP 161
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Approved by	Santos QNT Pty
Date approved	6 September 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	
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Position	Manager – Onshore New Ventures
Date	06/09/2021

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Abbreviations and Units

Acronym / Abbreviation	Description
AAPA	Aboriginal Areas Protection Authority
AEPR	Annual Environmental Performance Report
ALARP	As low as reasonably practicable
Code	Code of Practice
DENR	Department of Environment and Natural Resources
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
SMS	Santos Management System

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 McArthur Basin Civil and Seismic Program that was approved on 6 June 2019. The period covered by this AEPR is from 6 June 2020 until 5 June 2021.

During the reporting period for the regulated activity:

- The civil works were focussed on maintenance of the previously constructed Tanumbirini well pad area in advance of the 2021 drilling program
- These works were undertaken in the period March 2021-May 2021
- No seismic surveys were undertaken
- No new clearing of native vegetation was undertaken

Task	2020							2021																										
	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	March				April				May				June				July							
								Week Number				1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4			
Inacumba Pad Civils Construction																																		
Tanumbirini Pad Site Construction/Maintenance																																		
Phase 1 Seismic Line Preparation																																		
Phase 1 Seismic Acquisition																																		

*Civils work paused from 15 March to 1 April

Figure 1 Timing of Regulated Activities Conducted During the Reporting Period

1.1 Background

Santos QNT Pty Ltd (Santos) submitted the *McArthur Basin Civil and Seismic Program EPE 161 EMP, Revision 4, June 2019* (EMP 2019) under the *Petroleum (Environment) Regulations (PER)* that came into force 6 July 2016.

EMP 2019 was approved on 6 June 2019. This AEPR has been prepared to report on activities that have occurred under EMP between 6 June 2020 and 5 June 2021.

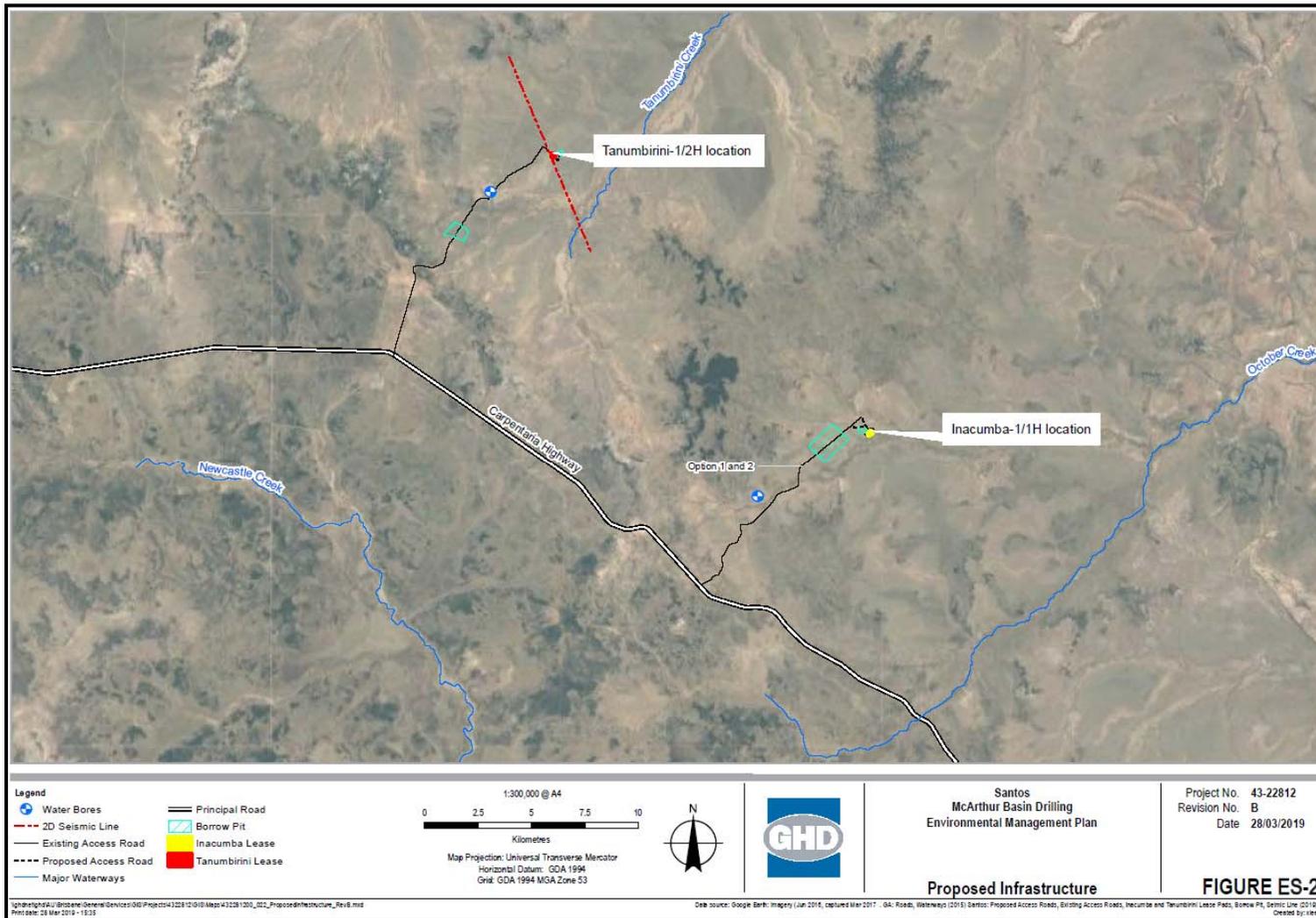


Figure 2 Location of Regulated Activities

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 the EMP 2019.
2. Compliance with each environmental outcome and environmental performance standard within the EMP 2019.
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. Review of the landholder consultation records.
 - ii. Review of daily reports and daily check lists.
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>The approval is subject to the following conditions:</p> <p>The interest holder must submit to Department of Environment and Natural Resources (DENR) a detailed timetable and breakdown of all civils works for the regulated activity prior to commencement of the activity and update the timetable each month.</p>	Compliant	<p>Initial timetable sent to DEPWS 7 June 2019 prior to commencement of the regulated activity (updated on 10 June 2019 to include 2D seismic – as requested by DEPWS). Subsequent updates issued 17 September 2019, 25 October 2019, 18 December 2019, 28 January 2020, 18 February 2020, and 3 June 2020.</p> <p>On 27 May 2020 a letter was sent to DEPWS detailing all ongoing EMP commitments, including this regulated activity, would be delayed as a result of COVID-19.</p> <p>On 10 Feb 2021 a schedule for EP161 was emailed to DEPWS showing that the timetable for post wet season civils were planned from March 2021 to early April 2021. A second schedule for EP161 was provided on 10 March 2021 showing that the timetable for post wet season civils had been extended from March 2021 to late April 2021.</p> <p>Between mid-March 2021 and early April 2021 the regulated activity was paused and crews were off site extending the regulated activity to May 2021. In the period from mid-March 2021 to mid-May 2021 a series of reports were provided to DEPWS. Approximately 70 daily reports, civils reports and site reports, for the regulated activity were provided to DEPWS. Both civils reports and site reports were provided on approximately 25 days.</p> <p>On 4 June 2021 DEPWS were notified that the regulated activity was complete and no further reports or checklists would be provided.</p>
2	<p>The interest holder must develop, in consultation with DENR, a rehabilitation plan for each disturbed area appropriate to the nature and scale of the activity.</p>	Not Applicable	<p>The site is operational and rehabilitation activities are yet to commence. A rehabilitation plan for each disturbed area appropriate to the nature and scale of the activity will be developed in consultation with DEPWS.</p>

No	Ministerial Condition	Compliance Status	Evidence
3	The regulated activity must be undertaken in compliance with relevant requirements of Part A (Surface Activities) of the Code of Practice: Onshore Petroleum Activities in the Northern Territory.	Compliant	<p>A.3.1 Site selection and planning</p> <p>The project footprint area is illustrated in Figure 2. As per the EMP, approximately 40% of the project area is located in areas of existing disturbance.</p> <p>A.3.2 Well pad site selection requirements</p> <p>Figure 2 demonstrates that the two well locations in this plan spaced a minimum of 2km apart.</p> <p>Where a well pad is located <1km from an existing water supply bore used for domestic or stock consumption the Land Access and Compensation Agreement demonstrates that the owner of the water supply bore consents in writing to the location of the well pad.</p> <p>A.3.3 Noise</p> <p>Under the Northern Territory Noise Management Framework Guideline there are no sensitive noise receptors within the vicinity of the project area in Figure 2. There are no complaints relating to noise in the IMS.</p> <p>A.3.4 Erosion and sediment control and hydrology</p> <p>The Erosion and Sediment Control Plan - EP 161 was Appendix E of the approved EMP. This plan was developed under the supervision of Tim Elder Certified Professional in Erosion and Sediment Control. This plan was implemented.</p> <p>A.3.5 Biodiversity protection</p> <p>The ecological assessment attached to the EMP did not identify any critical or important habitats. The site selection process ensured that 40% of the project area is located in areas of existing disturbance. An approved weed management plan was in place.</p> <p>A.3.6 Weed management</p> <p>A project specific weed management plan was developed in consultation with the weed management officer and attached to the EMP (Appendix F). The Weed Management Plan meets the requirements of the NT Weed Management Planning Guide: Onshore Petroleum Projects (DENR, 2019).</p>

No	Ministerial Condition	Compliance Status	Evidence
			<p>A.3.7 Fire management A fire management plan at a project level was developed as part of the EMP. This plan includes baseline fire information and fire management.</p> <p>A.3.8 Containment of contaminants A spill management plan was included as part of the EMP. There has been no transport of chemicals and wastewater on unsealed roads during the wet season.</p> <p>A.3.9 Rehabilitation A Rehabilitation Plan was included as part of an EMP. The rehabilitation plan included measures to achieve progressive rehabilitation and final land use management.</p>

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 Civil and Seismic Program Rev 4

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
1	<p>Majority of the project footprint area preferentially located in previously disturbed areas.</p> <p>Where possible, existing tracks, roads or seismic lines will be used for access.</p> <p>Site selection surveys to be undertaken prior to on-ground disturbance.</p> <p>Mature trees selected for preservation are to be flagged to ensure their protection.</p> <p>Cleared vegetation will be either stockpiled and respread during rehabilitation or mulched and spread as a sediment control technique to reduce erosion.</p> <p>Along the seismic lines, if light grading is necessary, flora rootstock will be left intact to promote regeneration.</p> <p>Hollow timber/trees that may be nesting/roosting sites for fauna will not be cleared.</p> <p>Where possible branches will be pruned in preference to total tree removal</p>	<p>Compliance with Santos Field Clearing Checklist</p>	<p>Compliant</p>	<p>No seismic surveys were undertaken during the reporting period. No new clearing of native vegetation was undertaken in the reporting period.</p> <p>The project footprint area is illustrated in Figure 2. As per the EMP, approximately 40% of the project area is located in areas of existing disturbance.</p> <p>EMP daily checklist confirms compliance with the site inductions conducted prior to commencing activity.</p>
2	<p>For the seismic line blade work will not be undertaken on naturally smooth surfaces or flat easy terrain.</p> <p>Driving is only permitted on designated access roads and seismic lines.</p>	<p>No off-road driving.</p> <p>Vehicle speeds do not exceed 80 km/hr on unsealed roads, 40 km/hr on seismic lines.</p>	<p>Compliant</p>	<p>No seismic surveys were undertaken during the reporting period.</p> <p>Site inductions conducted prior to commencing activity.</p> <p>EMP daily checklist confirms compliance with Environmental Performance Standards regarding</p>

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	<p>Speeds on unsealed roads will be limited – maximum 80 km/hr on unsealed roads, 40 km/hr on seismic lines.</p> <p>Water trucks will be used to manage dust emissions from vehicle movement and civil operations on the site</p>	<p>Dust control measures implemented</p>		<p>driving only on designated access roads and seismic lines, adherence to speed limits, and dust control measures.</p> <p>There were no incidents in the Incident Management System relating to speed limits or driving off permitted access tracks.</p> <p>Beetaloo daily checklist confirms the ongoing dust suppression, using tankers during civil operations.</p>
3	<p>Engines/Machinery will be maintained as per planned maintenance systems.</p> <p>Engines/machinery will have noise suppression devices</p>	<p>Engines/machinery maintained in accordance with manufacturers specifications and frequencies as detailed in the Santos maintenance system.</p> <p>Engines/machinery fitted with noise suppression devices.</p>	Compliant	<p>EMP daily checklist confirms maintenance of engines/machinery and noise suppression devices.</p>
4	<p>Reduce disturbance to native flora and fauna</p> <p>Minimise light pollution through task focused lighting and positioning camp boundary lighting inwards.</p>	<p>Task focused lighting employed.</p> <p>All camp boundary lighting positioned inwards at all times.</p>	Compliant	<p>EMP daily checklist confirms camp boundary lighting positioned inwards.</p>
5	<p>Speeds on unsealed roads will be limited – maximum 80 km/hr on unsealed roads, 40 km/hr on seismic lines.</p> <p>Driving is only permitted on designated access roads and seismic lines.</p> <p>Pits and dams will be fenced</p>	<p>No off-road driving.</p> <p>Vehicle speeds do not exceed 80 km/hr on unsealed roads, 40 km/hr on seismic lines.</p>	Compliant	<p>Site inductions conducted prior to commencing activity. Induction includes information regarding speed limits.</p> <p>EMP daily checklist confirms compliance with Environmental Performance Standards regarding no off-road driving, speed limits, checks of pits and dams.</p>

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	Daily checks of pits and dams once constructed Borrow pit excavations will be backfilled with overburden once borrow removal has been completed.	Pits and dams fenced and checked daily		There were no incidents in the Incident Management System relating to speed limits or driving off permitted access tracks.
		Borrow pits backfilled upon completion	Not Applicable	The locations remain active, borrow pits not yet backfilled.
6	Weed Management Plan developed	Compliance with DEPWS approved Weed Management Plan.	Compliance	The Weed Management Plan developed and attached to the EMP was endorsed by DEPWS. This plan was complied with during the reporting period. Weed declarations were signed for all vehicles and a register of weed declarations is kept. A project specific weed management plan was developed in consultation with the weed management officer and attached to the EMP (Appendix F). Post wet weed surveys were undertaken between 25 of May 2021 and 28 May 2021.
7	Fire-fighting equipment and competent fire-fighting personnel will be available. All vehicles will be equipped with portable fire extinguishers. Machinery and vehicles should be parked in areas of low fire risk. Any petrol motor vehicles or petrol-powered pumps will be fitted with spark arresters. All vehicles will be equipped with operational VHF and / or UHF radio transceivers. Smoking will only be permitted in areas clear of vegetation and there will be no disposal of butts to land.	Staff trained in use of fire-fighting equipment. Fire-fighting equipment available and serviced as per manufacturer's specifications. All staff inducted to this EMP.	Compliant	NT Senior Supervisor - Civil Works appropriately trained in fire-fighting. EMP daily checklist confirms compliance with Environmental Performance Standards regarding firefighting equipment and personnel, machinery and vehicles parked in areas of low fire risk, petrol vehicles/pumps fitted with spark arresters, vehicles fitted with VHF and/or UHF radios, smoking only in permitted areas. Site inductions conducted prior to commencing activity. Toolbox meetings conducted in accordance with Site rules listed on the EMP checklist.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	<p>All personnel will receive information prior to the commencement of the activity relating to:</p> <ul style="list-style-type: none"> • Provisions of the Emergency Response Plan including procedures during a fire emergency • The operation of firefighting equipment and communications • Restricted smoking requirements <p>Toolbox meetings will be conducted to:</p> <ul style="list-style-type: none"> • Alert the workforce of the fire risk level for the day • Discuss any fire risk management breaches and remedial actions. <p>Prior to conducting a controlled burn during a Fire Danger Period, a permit to burn will be obtained from Bushfires NT</p>	<p>Spread, intensity and duration of fires are appropriately controlled.</p>	<p>Not Applicable</p>	<p>The location of fire-fighting equipment is shown on the camp plan and the location of the fire extinguishers is part of the camp induction.</p> <p>Gate 2 check on certification ensures fire-fighting equipment available and serviced as per manufacturer's specifications.</p> <p>No controlled burns were undertaken during the reporting period</p>
8	<p>Routine inspections of waste storage areas to ensure all waste are in the appropriate place.</p> <p>Waste removed by an approved NT EPA contractor.</p>	<p>All waste segregated and stored Appropriately in accordance with this EMP.</p> <p>Only waste from approved wastewater systems and grey water disposed of to land.</p> <p>Licensed waste contractor used for any offsite transfer or disposal.</p>	<p>Compliant</p>	<p>Daily checklist confirms that waste was segregated and stored on site and all putrescible waste material will be held in fauna proof containers.</p> <p>Environment Protection Licence (Pursuant to section 34 of the <i>Waste Management and Pollution Control Act</i>) demonstrates that waste contractors are licenced:</p> <ul style="list-style-type: none"> • Licensee Arnhem Earthmoving & Mechanical Pty Ltd. • Licence Number EPL196 <p>Wastewater Works Design Approval (Approval Number: WW2019/124) demonstrates that wastewater systems used under this EMP were approved by Department of Health.</p>

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
9	<p>The project area, including access tracks have been preferentially located in previously disturbed areas. Existing, landholder access tracks have been utilised where possible to minimise soil compaction. Grading will be minimised where feasible.</p> <p>Along the seismic lines, if light grading is necessary, flora rootstock will be left intact to promote regeneration.</p> <p>An ESCP will be developed by a CPESC and approved by DEPWS prior to commencement of the project</p>	<p>Santos Field Clearing Checklist</p> <p>Compliance with DEPWS approved Erosion and Sediment Control Plan</p>	Compliant	<p>The project footprint area is illustrated in Figure 2. As per the EMP, approximately 40% of the project area is located in areas of existing disturbance. Existing landholder access tracks have been used where possible.</p> <p>EMP daily checklist confirms grading was minimised.</p> <p>The Erosion and Sediment Control Plan - EP 161 was Appendix E of the approved EMP. This plan was developed under the supervision of Tim Elder Certified Professional in Erosion and Sediment Control. This plan was implemented. Photos and drone footage confirm earth/topsoil bunds, mite drains, flow diversion berms and rocking, were installed in accordance with the ESCP. In addition, topsoil was stockpiled to minimise erosion.</p> <p>Two Borrow pits were constructed during previous reporting periods:</p> <ul style="list-style-type: none"> • 3ha at the Inacumba location • 1.9ha at the Tanumbirini location <p>GIS data indicates that the total area of disturbance at the Tanumbirini location is less than the total area of disturbance estimated within the EMP.</p>
10	<p>Spill kits available to treat spills in-situ.</p> <p>Minimise fuel transfer where possible.</p> <p>Use of drip trays for transfers.</p> <p>Any spills contained and remediated.</p> <p>Fuel and other lubricants will be appropriately stored and managed, in accordance with AS1940</p>	<p>Spill kits, spill containment, and appropriate bunding in all relevant areas.</p> <p>All spills and leaks are remediated as soon as possible.</p>	Compliant	<p>EMP daily checklist confirms compliance with the Environmental Performance Standards regarding in-situ spill kits, minimisation of fuel transfer, and use of drip trays for transfers, containment and remediation of spills appropriate management and storage of fuel and lubricants, and compliance with the Spill Management Plan. There were no recordable or reportable spills or incidents.</p>

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		<p>Compliance with the Code of Practice for Petroleum Activities in the Northern Territory.</p> <p>Compliance with the Spill Management Plan (Section of 7 of the EMP).</p>		
11	<p>All major creek crossings and floodways intersected by the access tracks will be subject to rocking to avoid and minimise erosion.</p> <p>Mitre drains and flow control banks (whoa boys) will be installed across access roads where required.</p>	<p>Compliance with DEPWS approved Erosion and Sediment Control Plan.</p>	Compliant	<p>EMP daily checklist confirms rocking of access tracks and installation of drains/flow control banks where required.</p> <p>The Erosion and Sediment Control Plan - EP 161 was Appendix E of the approved EMP. This plan was developed under the supervision of Tim Elder Certified Professional in Erosion and Sediment Control. This plan was implemented.</p>
12	<p>No long-term impacts to groundwater resources in the area.</p>	<p>Compliance with groundwater extraction licence approval conditions (i.e. volume limits will not be exceeded).</p>	Compliant	<p>The project was compliant with groundwater extraction licence approval conditions.</p>
13	<p>Disturbance is restricted to subject land and avoids the restricted work areas as detailed in the AAPA Authority Certificate.</p> <p>Known sites of sacred or cultural significance are identified and avoided.</p> <p>Any new sites identified during the activity will be reported to the NT Heritage Branch.</p>	<p>Compliance with requirements of AAPA certificate</p>	Compliant	<p>No new clearing of native vegetation was undertaken during the reporting period. Maintenance works during the reporting period were within previously established work areas primarily the Tanumbirini well pad area.</p> <p>Audit records show that all activities occur within the areas shown in AAPA Authority Certificate C2019/043 to ensure that the locations and activities covered</p>

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	Maintain GIS database of project area and cultural heritage sites including details of any works conditions			<p>under this EMP have been appropriately surveyed and subsequently conditioned.</p> <p>Site inductions covering cultural heritage issues conducted prior to commencement of activity.</p>
16	Noise complaints from vehicle movements and drilling activities minimised through active stakeholder engagement and complaints management	<p>No noise nuisance to users of adjacent land.</p> <p>Amicable resolution of complaints</p>	Compliant	Stakeholder engagement record shows that there are no complaints regarding noise.
17	<p>Disturbance, injury or death to livestock from vehicle movements and drilling activities minimised through active stakeholder engagement.</p> <p>Gates left in the condition in which they were found.</p> <p>Speeds on unsealed roads will be limited to a maximum 80 km/hr.</p> <p>Prohibit livestock access by fencing all pits and dams.</p> <p>Routine daily inspection pits and dams to ensure no trapped livestock.</p>	<p>No injury or death to livestock.</p> <p>Amicable resolution of complaints.</p> <p>Vehicle speeds do not exceed 80 km/hr on unsealed roads.</p> <p>No livestock access to pits and dams.</p>	Compliant	<p>Stakeholder engagement record shows that there are no complaints regarding injury or death of livestock.</p> <p>Daily checklist confirms gates were left in the condition in which they were found, all pits were fenced and dams were inspected daily.</p> <p>There were no incidents in the Incident Management System relating to speed limits or driving off permitted access tracks.</p> <p>No injury or death to livestock reported in the Incident Management System.</p>

18	No decrease in air quality due to increased inefficient vehicle and plant emissions.	<p>Vehicles and fixed plant maintained as per in accordance with manufacturers specifications and frequencies.</p> <p>Vehicles compliant with Northern Territory Motor Vehicle registry regulation and work health and safety regulations.</p>	Compliant	EMP daily checklist confirms compliance with Environmental Performance Standards regarding maintenance of vehicles and plant, and compliance with NT Motor Vehicle registry regulations.
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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	Not applicable, EMP 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, EMP 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, EMP 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, EMP 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	Not Applicable	Not applicable, EMP approved prior to Code being incorporated into Regulations.

No	Reference	Requirement	Compliance Status	Evidence
		the same water source is used for multiple stages) and 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.	Not Applicable	Not applicable, EMP 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, EMP 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, EMP 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, EMP 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, EMP approved prior to Code being incorporated into Regulations.

No	Reference	Requirement	Compliance Status	Evidence
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, EMP 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 interaction with wildlife, stock and human receptors with wastewater.	Not Applicable	Not applicable, EMP approved prior to Code being incorporated into Regulations.
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, EMP 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, EMP 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, EMP 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, EMP approved prior to Code being incorporated into Regulations.

No	Reference	Requirement	Compliance Status	Evidence
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, EMP 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, EMP 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 met, and the Minister advises the interest holder the notice is accepted and the plan ceases to be in force.	Compliant	The current EMP remains in force to cover final rehabilitation assessments and any additional restoration of 2D seismic lines that may be required.
20	EMP s 9.4 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 continued and is ongoing.
21	EMP Section 8.6 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 the reporting period.
22	EMP Section 8.6 Incident Reporting	Reports on reportable incidents are to be provided to DEPWS as soon as practicable and within 72 hours of the event occurring.	Not Applicable	There were no reportable incidents during the reporting period.

No	Reference	Requirement	Compliance Status	Evidence
	Reg 34	A final report must be provided to DEPWS within 30 days after remediation/clean-up of the affected area.		
23	EMP Section 8.6 Incident Reporting Reg 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).	Compliant	<p>Reports on all recordable incidents were provided:</p> <ul style="list-style-type: none"> • 1st report provided for the period 4 June 2020 to 2 September 2020 on 9 September 2020 (no incidents) • 2nd report provided for the period 3 September 2020 to 2 December 2020 on 15 December 2020 (no incidents) • 3rd report provided for the period 3 December 2020 to 3 March 2021 provided on 15 March 2021 (no incidents) • 4th report provided for the period 4 March 2020 to 31 March 2020 on 14 April 2021 (no incidents) • 5th report provided for the period 1 April 2021 to 30 June 2021 on 14 July 2021 (no incidents)
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	The regulated activity did not include hydraulic fracturing.
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 hydraulic fracturing.
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 before commencement of activity.	Compliant	The EMP was approved by the Minister on 6 June 2019, prior to civils works commencing on 15 June 2019. DITT approved Santos' application to acquire 2D seismic on 9 July 2019, prior to commencing seismic line preparation on 22 July 2019.

No	Reference	Requirement	Compliance Status	Evidence
				<p>A Land Access and Compensation Agreement was in place prior to the commencement of activity (executed May 2019).</p> <p>On 27 May 2020 a letter was sent to DEPWS detailing all ongoing EMP commitments, including this regulated activity, would be delayed as a result of COVID-19.</p> <p>On 10 Feb 2021 a schedule for EP161 was emailed to DEPWS showing the timetable for post wet season civils, planned from March 2021 to early April 2021. A second schedule for EP161 was provided on 10 March 2021 showing the timetable for post wet season civils had been extended from March 2021 to late April 2021.</p> <p>Notice of entry was issued prior to commencing civils works. The owner of Tanumbirini Station changed, and during the reporting period the Land Access and Compensation Agreement was varied as part of ongoing engagement regarding the work programs for 2021 and 2022. Engagement recorded in the engagement log.</p>
29	EMP Section 7.3.3	<p>Annual Fire Mapping</p> <p>If during the proposed exploration works a fire has occurred in and around the project footprint, Santos in consultation with the landholder and with the landholders approval endeavour to map the extent of the fire and provide that information to DEPWS.</p>	Not Applicable	No fires occurred in and around the project footprint during the reporting period
30	EMP Section 7.4.2	<p>Final Rehabilitation Report</p> <p>Following completion of the rehabilitation works, final photo point revisit and any</p>	Not Applicable	The well pads and seismic line covered by this EMP remain in use, with drilling at the Tanumbirini and Inacumba locations scheduled for 2021/2022. Final rehabilitation inspections and reporting will be

No	Reference	Requirement	Compliance Status	Evidence
		required additional rehabilitation, Santos will submit the final Environmental Reports to DITT and DEPWS along with the application to release the long-term Rehabilitation Security.		undertaken once all proposed activity at these locations has been completed.

3.0 Summary of Compliance

3.1 Overview of Compliance

Table 5 provides a summary of the results of the compliance assessment against the 49 total compliance items.

Table 5: Compliance Summary

Compliance Indicator	Number	Percentage
Compliant	22	45
Partially Compliant	0	0
Not Compliant	0	0
Not Applicable	27	55

3.2 Overview of Items Found Not Compliant or Partially Compliant

3.2.1 Ministerial Approval Conditions

3.2.1.1 Description

Compliant.

3.2.1.2 Analysis of Potential Environmental Harm or Impact

3.2.1.3 Corrective Actions

3.2.2 Environmental Performance Standards

3.2.2.1 Description

Compliant.

3.2.2.2 Analysis of Potential Environmental Harm or Impact

3.2.2.3 Corrective Actions

3.2.2.4 Description

3.2.3 Regulatory Reporting

3.2.3.1 Description

Compliant.

3.2.3.2 Analysis of Potential Environmental Harm or Impact

3.2.3.3 Corrective Actions