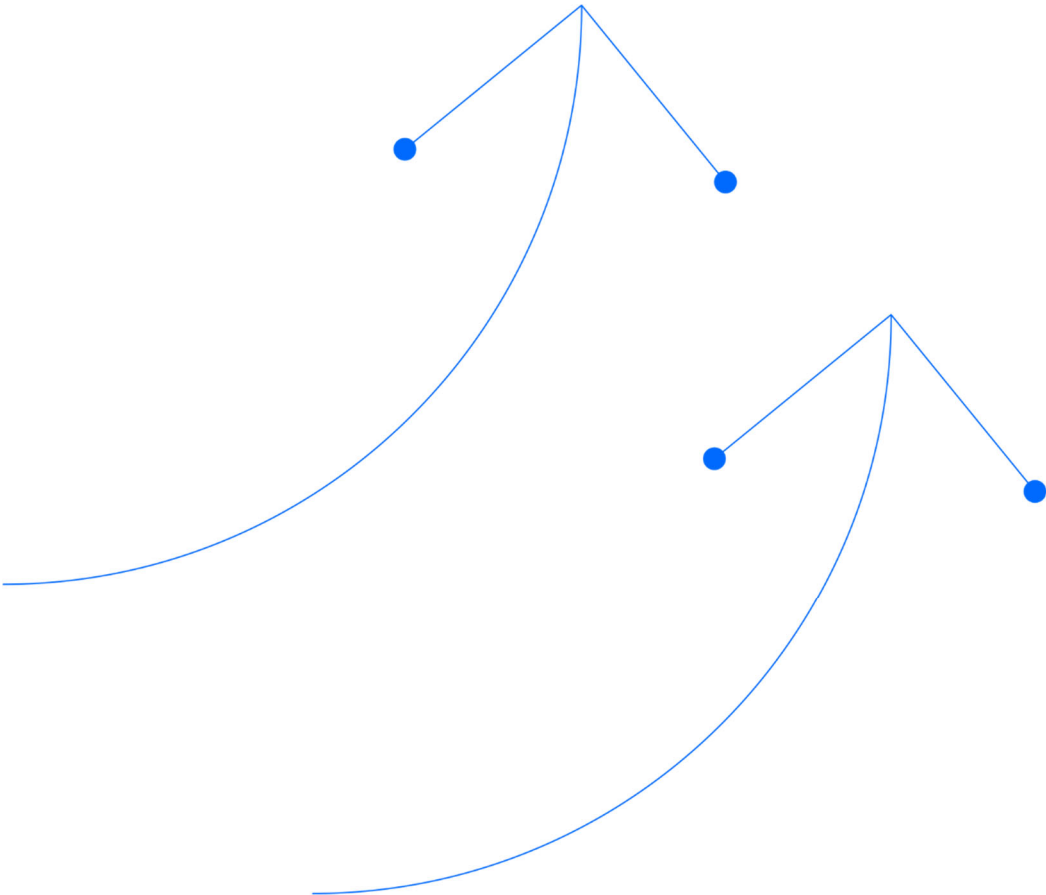


ANNUAL ENVIRONMENTAL PERFORMANCE REPORT 2023

Southern Amadeus 2D Seismic Program



Document Title	Annual Environmental Performance Report 2023 Southern Amadeus 2D Seismic Program
Environmental Management Plan covered	Santos Southern Amadeus 2D Seismic Program EMP, Proposed Revision, September 2017
Permit	EPs 82, 105, 112 and 125
Interest Holder Details	<p>Santos QNT Pty Ltd 60 Flinders Street, Adelaide South Australia 5000 GPO Box 2455, Adelaide South Australia 5001 ABN 33 083 077 96</p> <p>Helium Australia Pty Ltd ABN 11 078 104 006 GPO Box 292, Brisbane, Qld, 4001</p> <p>Merlin Energy Pty Ltd ABN 95 081 592 734 GPO Box 292, Brisbane, Qld, 4001</p> <p>Frontier Oil and Gas Pty Ltd ABN 91 103 194 136 GPO Box 292, Brisbane, Qld, 4001</p> <p>Ordiv Petroleum Pty Ltd ABN 29 111 102 697 GPO Box 292, Brisbane, Qld, 4001</p>
Operator Details	Santos QNT Pty, 60 Flinders Street, Adelaide South Australia 5000 GPO Box 2455, Adelaide South Australia 5001 ABN 33 083 077 96
Approved by	Santos QNT Pty
Date Approved	21 February 2024

Signature and Certification

I/We hereby declare that the information provided in this annual environment performance report and accompanying documents is to the best of my/our knowledge, true and correct.

Asset / Project Approval

Signature



Name (print)

David Gornall

Position

Manager Environment Onshore HSER

Date

21 February 2024

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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
SMS	Santos Management System
SSCC	Sacred Site Clearance Certificate

1. Introduction

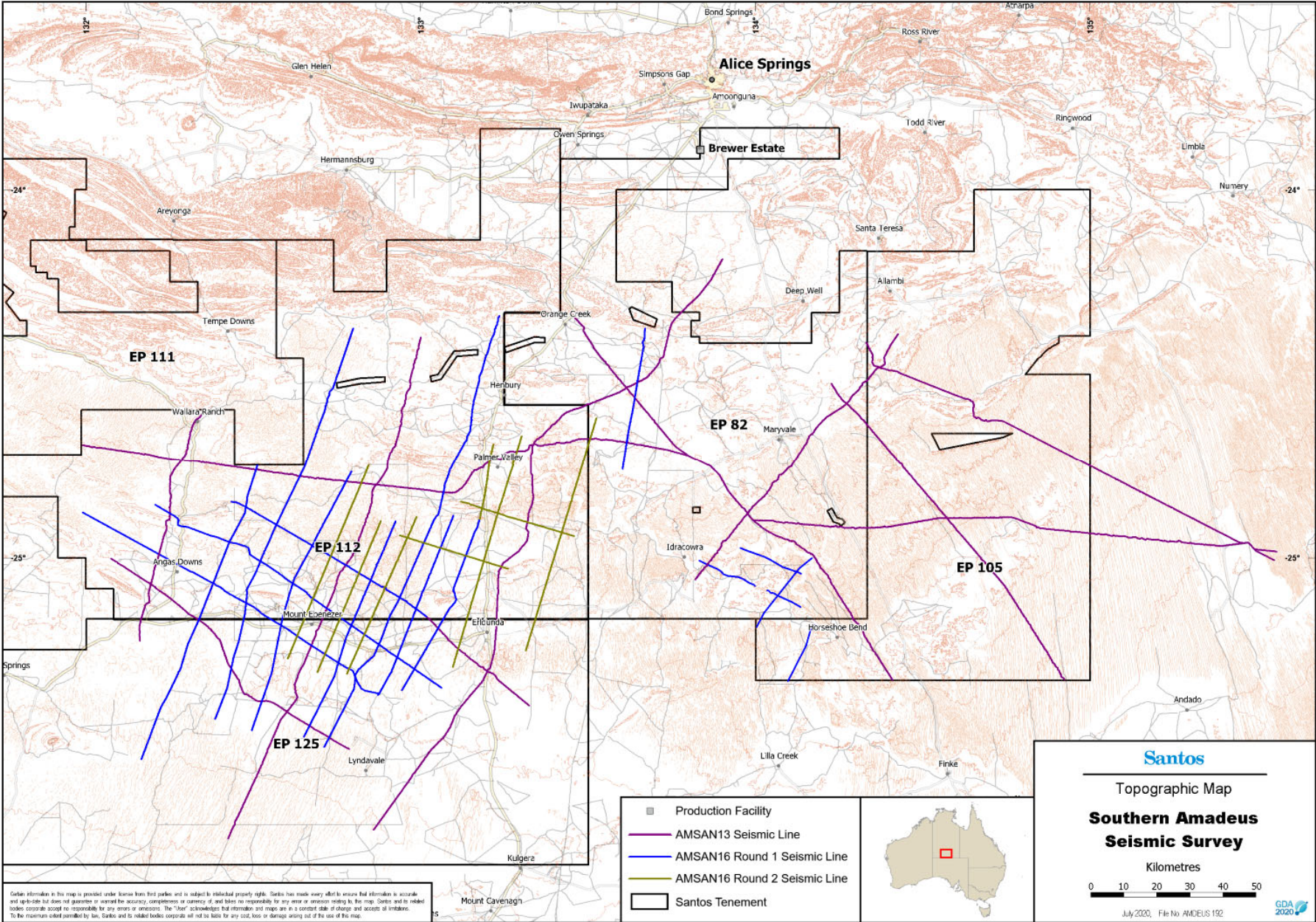
The *Petroleum (Environment) Regulations 2016* (PER) include a requirement for the interest holder to provide a report to the Minister on an annual basis that outlines the environmental performance of the interest holder (the Annual Environment Performance Report). The report must include sufficient information to allow the Minister to assess whether the interest holder has met the environmental outcomes and environmental performance standards included in the approved Environment Management Plan (EMP). The report is to consider information required to be recorded, monitored or reported under the PER and any other law in force in the Northern Territory related to conduct of the regulated activity.

This Annual Environmental Performance Report (AEPR) applies to the Southern Amadeus 2D Seismic Program that was approved on 30 November 2017 (Figure 1). The period covered by this AEPR is from 30 November 2022 to 29 November 2023.

1.1. Background

Santos QNT Pty Ltd (Santos) submitted the *Santos Southern Amadeus 2D Seismic Program EMP, Proposed Revision, September 2017* (EMP 2017) under the PER that came into force 6 July 2016. EMP 2017 was submitted to cover the following scope:

- Rehabilitation monitoring and any additional restoration required for AMSAN13 2D seismic lines acquired under the Santos Southern Amadeus Seismic Survey Environmental Plan, May 2013 (EMP 2013)
- Rehabilitation monitoring and any additional restoration required for AMSAN16 2D Round 1 seismic lines acquired under the Santos 2016 Southern Amadeus 2D Seismic Program Environment Plan, June 2016 (EMP 2016)
- Completion of the AMSAN16 2D seismic survey (Round 2)
- EMP 2017 was approved on 30 November 2017, conditional on the AMSAN16 2D seismic survey being completed within one year.
- This AEPR has been prepared to report on activities that have occurred under EMP 2017 between 30 November 2022 and 29 November 2023. No regulated activities were undertaken during the reporting period.



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1.2. Contents of Performance Report

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

- Compliance with Ministerial approval conditions for each EMP.
- Compliance with each environmental outcome and environmental performance standard within the EMP 2017.
- Compliance with reporting requirements in accordance with the Code and Regulations.
- All recordable and reportable incidents, including root cause analysis and related corrective actions to prevent re-occurrence.
- Findings of all regulatory inspections and audits and related actions to address any findings.

1.3. Assessment of Compliance

Table 1 shows the compliance status indicators used in this AEPR.

Table 1: Compliance descriptors

Indicator	Description
Compliant	Compliant with requirement for the reporting period
Not Compliant	Not compliant with the requirement during the reporting period
Not Applicable	Requirement not applicable during the reporting period

1.4. Evidence of Compliance

The following sources of evidence are used to demonstrate compliance:

- Internal monitoring of compliance by Santos through internal audits of compliance and reporting including incident reporting.
- Outcomes from regulator inspections conducted by the Department of Environment, Parks and Water Security (DEPWS) (Petroleum Operations Branch).
- Recordable and reportable incident reports submitted to DEPWS Petroleum Operations
- Reports provided to DEPWS, the Department of Industry Tourism and Trade (DITT) and other government agencies.

2. Demonstration of Compliance

Table 2 demonstrates Santos’s compliance with Ministerial EMP approval conditions.

Table 2: Compliance with ministerial EMP approval conditions from 30 November 2022 until 29 November 2023.

Item No.	Ministerial Condition	Compliance Status	Evidence
1.	The approval is subject to the following conditions: a. The regulated activity must be completed within 1 year after the date of decision	Not Applicable	No regulated activities occurred during the reporting period.

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

Table 3: Compliance with Environmental Outcomes and Environmental Performance Standards

Item No.	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
1.	Minimise disturbance to and contamination of soil resources.	Inductions to inform operators that blade work only undertaken where excessively rough terrain occurs	Not Applicable	There were no operations during this reporting period.
2.		Inductions to inform operators that blade work shall be kept shallow so as to only disturb minimal topsoil / root-stock and only single blade width will be cleared.	Not Applicable	There were no operations during this reporting period.
3.		Inductions to inform operators that root stock, topsoil and seeds are left on line during line preparation.	Not Applicable	There were no operations during this reporting period.
4.	Minimise disturbance to drainage patterns	No vehicle access, roads or seismic lines to occur on clay pans or salt lakes.	Not Applicable	There were no operations during this reporting period.

	and avoid contamination of surface waters and shallow groundwater resources.			
5.	Minimise disturbance to native vegetation and native fauna. .	All activities will comply with the land access agreements regarding access track arrangements.	Not Applicable	There were no operations during this reporting period.
6.		Inductions to inform operators that vegetation is removed only when necessary.		
7.		No removal of creek bank vegetation. - will be covered in CLC approvals		
8.		No unauthorised offline driving.		
9.		All activities will comply with the land access agreements		
10.		Procedures will be in place to require restoration stage to follow recording activities.		
11.	Avoid disturbance to sites of cultural, sacred and heritage significance.	No disturbance to areas outside of the area permitted under the SSCC.	Not Applicable	There were no operations during this reporting period
12.		All personnel are given environmental and cultural heritage inductions prior to commencing work.	Not Applicable	
13.		Suspected artefacts are avoided and documented.	Not Applicable	
14.	Minimise disturbance to livestock, pastoral infrastructure and landholders.	Inductions for all employees and contractors cover pastoral, conservation, legislation and infrastructure issues.	Not Applicable	There were no operations during this reporting period.

15.		Relevant landowners and occupiers are notified prior to activity of preparation of camp sites, preparation of survey lines and undertaking of operations.	Not Applicable	There were no operations during this reporting period.
16.		Compliance with requirements of the Cattle Care and Organic Beef accreditation programmes or management as requested by the landholders, including full time monitoring by on field staff and inclusion in site inductions	Not Applicable	There were no operations during this reporting period.
17.		All gates are left in the condition in which they were found (i.e. open / closed).	Not Applicable	There were no operations during this reporting period.
18.		Relevant third party tenement holders shall be notified of activity including preparation of camp sites, preparation of survey lines and undertaking of operations.	Not Applicable	There were no operations during this reporting period.
19.		System is in place for logging landholder complaints to ensure that issues are addressed as appropriate.	Compliant	Landholder consultation record include a system for logging landholder complaints. There were no operations during the current reporting period, therefore there were no stakeholder meetings.
20.		Inductions to inform operators that damage to station tracks to be avoided.	Not Applicable	There were no operations during this reporting period.
21.		Damaged fencing will be restored to the satisfaction of the landowner / manager.	Not Applicable	There were no operations during this reporting period.
22.		All activities will comply with the land access agreements regarding access track arrangements.	Not Applicable	There were no operations during this reporting period.
23	Minimise disturbance to	All personnel are given environmental and cultural heritage inductions prior to commencing work.	Not Applicable	There were no operations during this reporting period.

	native vegetation and fauna			
24.	Minimise disturbance to landholders	Relevant landowners and occupiers are notified prior to activity including preparation of camp sites, preparation of survey lines and undertaking of operations.	Not Applicable	There were no operations during this reporting period.
25.		Seismic sources are not to operate within the distance defined by Santos standards, of any pipeline, utility, installation or building.	Not Applicable	
26.	Minimise disturbance to and contamination of soil resources	Inductions to inform operators that blade work only undertaken where excessively rough terrain occurs.	Not Applicable	There were no operations during this reporting period.
27.		Procedures will be in place to require restoration stage to follow recording activities.	Not Applicable	
28.		An Erosion and Sediment Control Plan specific for the activity will be developed and implemented.	Not Applicable	
29.	Minimise disturbance to drainage patterns and avoid contamination of surface waters and shallow groundwater resources	Operations are shut down during wet weather or flooding and only restarted once potential for extensive damage has passed.	Not Applicable	There were no operations during this reporting period.
30.		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	
31.	Minimise disturbance to native vegetation and native fauna	All activities will comply with the land access agreements.	Not Applicable	There were no operations during this reporting period
32.		Inductions to inform operators that disturbance to steeper slopes and escarpments of tableland land systems are to be avoided when possible.		
33.		No removal of creek bank vegetation.		
34.		All windrows are removed either during or on completion of work.		

35.		Procedures will be in place to require restoration stage to follow recording activities.		
36.		No unauthorised offline driving.		
37.		All activities will comply with the land access agreements.		
38.		Camp sites are ripped on completion of activity.		
39	Avoid disturbance to sites of cultural, sacred and heritage significance	No disturbance to areas outside of the area permitted under the SSCC.	Not Applicable	There were no operations during this reporting period.
40	Minimise disturbance to native vegetation and fauna	All activities will comply with the land access agreements.	Not Applicable	There were no operations during this reporting period.
41.	Minimise the visual impact of seismic operations	Inductions to inform operators that blade work only undertaken where excessively rough terrain occurs.	Not Applicable	There were no operations during this reporting period.
42.		All activities will comply with the land access agreements.		
43	Minimise disturbance to livestock, pastoral infrastructure and landholders	All activities will comply with the land access agreements.	Not Applicable	There were no operations during this reporting period.
44.	Minimise disturbance to native vegetation and fauna	All personnel are given environmental and cultural heritage inductions prior to commencing work.	Not Applicable	There were no operations during this reporting period.
45.		All generated waste (including consumable rubbish such as lunch wrappers) shall be returned to the camp and placed in the appropriately waste receptacle.	Not Applicable	
46.		All loads of rubbish are covered during transport.	Not Applicable	
47.		Covered bins are provided for the collection and storage of wastes.	Not Applicable Not Applicable	

48.		All empty drums will be stored on impervious areas with their closures in place or transported immediately off-site.	Not Applicable	
49.		All loads of rubbish are covered during transport.	Not Applicable	
50.		No incineration or open burning of waste materials shall occur on-site.	Not Applicable	
51.	Minimise disturbance to native vegetation and fauna	No liquid wastes will be released accidentally or routinely discharged to surface waters.	Not Applicable	There were no operations during this reporting period.
52.		Waste shall be removed from the camp by an appropriately licensed contractor and disposed at an approved facility. Records shall be kept of disposal of waste oils and fluids and hazardous wastes.	Not Applicable	
53.		Wastewater from laundry, showers and kitchen is piped to an irrigation area outside of the camp.	Not Applicable	
54.		Wastepaper, cardboard and food scraps are disposed of into sealed bins set up adjacent to the camp area. The sealed bins are transported regularly for waste disposal at a licensed landfill. Recyclable materials are segregated on camp and regularly transported to a licensed waste depot in Alice Springs.	Not Applicable	
55.		Unusable tyres are returned to Alice Springs for recycling.	Not Applicable	
56.	Minimise disturbance to livestock, pastoral infrastructure and landholders	All boundary lighting will be positioned to face inwards to provide adequate lighting for safe operations, without excessive overspill.	Not Applicable	There were no operations during this reporting period.
57.		All activities will comply with the land access agreements regarding access track arrangements.	Not Applicable	
58	Minimise disturbance, injury or death to native fauna	All personnel are given environmental and cultural heritage inductions prior to commencing work.	Not Applicable	There were no operations during this reporting period.
59	Minimise disturbance to livestock, pastoral	Appropriate agreements will be in place with landowners / pastoralists for local water sources	Not Applicable	There were no operations during this reporting period.

	infrastructure and landholders			
60	Minimise impact to groundwater and / or watercourses	If local water resources are to be used, bore numbers and estimated extraction volumes will be provided to DPIR.	Not Applicable	There were no operations during this reporting period.
61	Minimise negative impacts to soil quality	Fuel storage is in accordance with dangerous goods regulations.	Not Applicable	There were no operations during this reporting period.
62.	Minimise changes to groundwater quality	Spill kits available to treat spills in situ	Not Applicable	There were no operations during this reporting period.
63.		All fuel stored and used should be under the control of qualified or trained personnel.	Not Applicable	There were no operations during this reporting period.
64.		Minimise fuel transfer where possible	Not Applicable	There were no operations during this reporting period.
65.		Use of road tanker for bulk fuel storage.	Not Applicable	There were no operations during this reporting period.
66.		Use of drip trays for transfers.	Not Applicable	There were no operations during this reporting period.
67.		Any spills contained and retrieved.	Not Applicable	There were no operations during this reporting period.
68.		Any spills will be remediated to the satisfaction of the landholder, fenced, soil removed to appropriate facility and signed off by land hold in accordance with the access	Not Applicable	There were no operations during this reporting period.
69.		Fuel and other lubricants will be appropriately stored and managed, in accordance with AS1940	Not Applicable	There were no operations during this reporting period.
70.	Minimise disturbance to native fauna	No unauthorised offline driving.	Not Applicable	There were no operations during this reporting period.
71.		Relevant landowners and occupiers are notified prior to activity of preparation of camp sites, preparation of survey lines and undertaking of operations.		

72.	Minimise disturbance to livestock	All gates are left in the condition in which they were found (i.e. open / closed).	Not Applicable Not Applicable	There were no operations during this reporting period.
73.	No unplanned interactions or disturbance to landholders	Damaged fencing will be restored to the satisfaction of the landowner / manager.	Not Applicable	There were no operations during this reporting period.
74.		Speed will be limited along lines to 40km/hr and 80km/hr on other unsealed roads.	Not Applicable	There were no operations during this reporting period
75.		Speed limits will be adhered to	Not Applicable	There were no operations during this reporting period
76.		Inductions to inform operators that blade work only undertaken where excessively rough terrain occurs.	Not Applicable	There were no operations during this reporting period
77.		Relevant landowners and occupiers are notified prior to activity of preparation of camp sites, preparation of survey lines and undertaking of operations.	Not Applicable	There were no operations during this reporting period

78.		Relevant mineral and geothermal tenement holders shall be notified of activity including preparation of camp sites, preparation of survey lines and undertaking of operations.	Not Applicable	There were no operations during this reporting period
79.		Inductions to inform operators that damage to station tracks to be avoided.	Not Applicable	There were no operations during this reporting period
80.		Inductions for all employees and contractors cover pastoral, conservation, legislation and infrastructure issues.	Not Applicable	There were no operations during this reporting period
81.		All litter is to be managed and disposed of correctly.	Not Applicable	There were no operations during this reporting period
82.		Compliance with requirements of the Cattle Care and Organic Beef accreditation programmes or management as requested by the landholders, including full time monitoring by on field staff and inclusion in site inductions.	Not Applicable	There were no operations during this reporting period
83.		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.
84.		All gates are left in the condition in which they were found (i.e. open / closed).	Not Applicable	There were no operations during this reporting period
85.		Damaged fencing will be restored to the satisfaction of the landowner / manager.	Not Applicable	There were no operations during this reporting period
86.		Seismic sources are not to operate within the distance defined by Santos standards, of any pipeline, utility, installation or building.	Not Applicable	There were no operations during this reporting period
87.		No camps to be established less than 1km from PWC groundwater bores.	Not Applicable	There were no operations during this reporting period
88	Minimise disturbance to native fauna/flora	A register of vehicle / equipment / machinery cleaning is kept.	Not Applicable	There were no operations during this reporting period.
89.	Minimise disturbance to livestock	A register of vehicle / equipment / machinery cleaning is kept.	Not Applicable	There were no operations during this reporting period.
90.		Notices of weeds to keep an eye out for displayed on mess room notice board and included in induction	Not Applicable	There were no operations during this reporting period.

91.		If infestations of priority weed species are identified during line prep, they will be avoided via a detour around the infestation if within line tolerance.	Not Applicable	There were no operations during this reporting period.
92.		A wash down of vehicles is required if they have passed through designated area(s).	Not Applicable	There were no operations during this reporting period.
93.		Records of detection, monitoring or eradication of exotic weed or other pest or noxious species introduced by activities are maintained.	Not Applicable	There were no operations during this reporting period.
94.		No soil or earth to be brought on site	Not Applicable	There were no operations during this reporting period.
95.		Vehicle cleaning facilities will be provided at camp sites	Not Applicable	There were no operations during this reporting period.
96	Minimise disturbance to native flora / livestock	Inductions for all employees and contractors cover fire season education.	Not Applicable	There were no operations during this reporting period.
97.	Minimise disturbance to landholders	Appropriate fire prevention procedures in place.	Not Applicable	There were no operations during this reporting period.
98.		Appropriate firefighting gear available to the crew	Not Applicable	There were no operations during this reporting period.
99.		All vehicles will be equipped with portable fire extinguishers.	Not Applicable	There were no operations during this reporting period.
100.		Machinery and vehicles will be parked in appropriate locations.	Not Applicable	There were no operations during this reporting period.
101.		Open fires, including open barbecues, billy fires, and brush burning, are banned on the project, in accordance with permission / restricted to a drum in accordance CLC agreement only in the campsite.	Not Applicable	There were no operations during this reporting period.
102.		Any petrol motor vehicles or petrol powered pumps will be fitted with spark arresters.	Not Applicable	There were no operations during this reporting period.

103.		All seismic vehicles will be equipped with fully operational VHF and / or UHF radio transceivers. The Contractor's recording truck will maintain 'fire watch' on the appropriate UHF channel during working hours.	Not Applicable	There were no operations during this reporting period.
104.		Smoking will only be permitted in areas clear of vegetation, and there will be no disposal of butts.	Not Applicable	There were no operations during this reporting period.
105.		All personnel will receive information prior to the commencement of the activity relating to <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.	Not Applicable	There were no operations during this reporting period.
106.		Toolbox meetings will be conducted to <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	Not Applicable	There were no operations during this reporting period.

Table 4 demonstrates Santos's compliance with reporting requirements in the *Code of Practice: Onshore Petroleum Activities in the Northern Territory (Code of Practice)* and the *Petroleum (Environment) Regulations 2016 (NT)*.

Table 4: Compliance with mandatory reporting requirements for Code of Practice and Petroleum (Environment) Regulations 2016.

Item No.	Reference	Requirement	Compliance Status	Evidence
1.	Code cl A.3.5	Geospatial information depicting areas cleared is to be provided to the Minister.	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	Not Applicable	Not applicable, approved prior to Code being incorporated into Regulations

		mapping to monitor changes to fire frequency in the relevant areas.		
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
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	Not Applicable	Not applicable, approved prior to Code being incorporated into Regulations

		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.	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 interaction with wildlife, stock and human receptors with wastewater.	Not Applicable	Not applicable, 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, approved prior to Code being incorporated into Regulations
14.	Code cl D.5.9.2(c)	Emissions from exploration, well construction (including during flowback) 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.	Regulation 14	A current EMP remains in force until the interest holder notifies the Minister the activity is no longer being carried out and all of the environmental outcomes and obligations under the plan have been met, and the Minister advises the interest holder the notice is accepted and the plan ceases to be in force.	Compliant	Current EMP remains in force.
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.	Not Applicable	There were no operations during the current reporting period, therefore there were stakeholder meetings.
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 operations during the current reporting period, therefore there were no reportable incidents.

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/cleanup of the affected area..	Not Applicable	There were no reportable incidents during the reporting period.
23.	EMP Section 8.8 Incident Reporting Regulation 34	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).	Not Compliant	There were no recordable incidents during the reporting period. Details of non-compliance: Santos did not submit reports for the following reporting periods confirming that there were no recordable incidents during the following reporting periods: - 2022 Quarter 4, required by 15 January 2023 - 2023 Quarter 1, required by 15 April 2023 - 2023 Quarter 2, required by 15 July 2023 Although Santos maintains it is compliant and that Reg 35 requires a report to be lodged where there was a recordable incident in the relevant reporting period, Santos has recorded this as 'non-compliant' in this report to accord with a previous request from DEPWS that this categorisation be applied in the above circumstances. Refer to AEPR (Rev 3), submitted 29 September 2023. Since that date Santos has committed to submitting reports under Reg 35 where there are no recordable incidents in the relevant reporting period. Accordingly, for 2023 Quarter 3, Santos submitted a report on 12 October 2023, confirming there were no recordable incidents during that reporting period.
24.	Regulation 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 hydraulic fracturing.
25.	Regulation 37B	A report about produced water from hydraulic fracturing must be provided to the Minister within 6 months of the produced water being extracted.	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	Not Applicable	There were no operations during this reporting period.

		which the activity is to be carried out before commencement of activity. .		
27.	EMP Section 8.7.4	<p>EMP Performance Report Timing: Within three months of completion of the seismic activity and full de-mobilisation of Plant and Equipment. Content: Summary of performance against the environmental performance outcomes and standards in the EMP.</p>	Not Applicable	There was no requirement during this reporting period.
28.	EMP Section 8.7.4	<p>Environmental Line Report Timing: Within three months of undertaking post-restoration photo point monitoring. Content: Photo point monitoring incorporating pre-line prep, post-line prep, post-recording and post-restoration photo point monitoring.</p>	Not Applicable	There was no requirement during this reporting period.
29	EMP Section 8.7.4	<p>Final Rehabilitation Report Timing: Following a minimum of one wet season post-restoration. Content: Final rehabilitation assessment and endorsement in accordance with the Environmental Closeout Procedures for Petroleum Activities (DPIR 2016).</p>	Not Applicable	There was no requirement during this reporting period.

3. Summary of Compliance

3.1. Overview of Compliance

Table 5 provides a summary of the results of the compliance assessment against the 136 total compliance items.

Table 5: Compliance Summary

Compliance Indicator	Number	Percentage
Compliant	3	2.2
Not Compliant	1	0.7
Not Applicable	132	97

3.2. Overview of items found Not Compliant

The following sections describe the any compliance requirements not met during the reporting period.

3.2.1. Ministerial Approval Conditions

Not applicable

3.2.2. Environmental Performance Standards

Not applicable

3.2.3. Regulatory Reporting

The one 'Non-Compliant' standard throughout the reporting period relates to the requirement under Regulation 35 to submit quarterly recordable incident reports. Santos did not submit reports for the quarterly reporting periods outlined in Table 4, Item 23, as there were no recordable incidents to be reported. Although Santos does not consider itself non-compliant with Regulation 35 in these circumstances, Santos has recorded this as 'non-compliant' in this report to accord with a previous request from DEPWS that this categorisation be applied in the above circumstances. Santos has received guidance from DEPWS that it expects quarterly reports to be submitted even where no recordable incidents occurred during the reporting period. Santos committed, on 29 September 2023, to include 'nil incident' reports in its reporting. This approach was adopted in the first reporting period that followed that commitment (2023 Quarter 3).