

Santos

**NARRABRI GAS
PROJECT
EPBC 2014/7376
COMPLIANCE REPORT**

May 2024

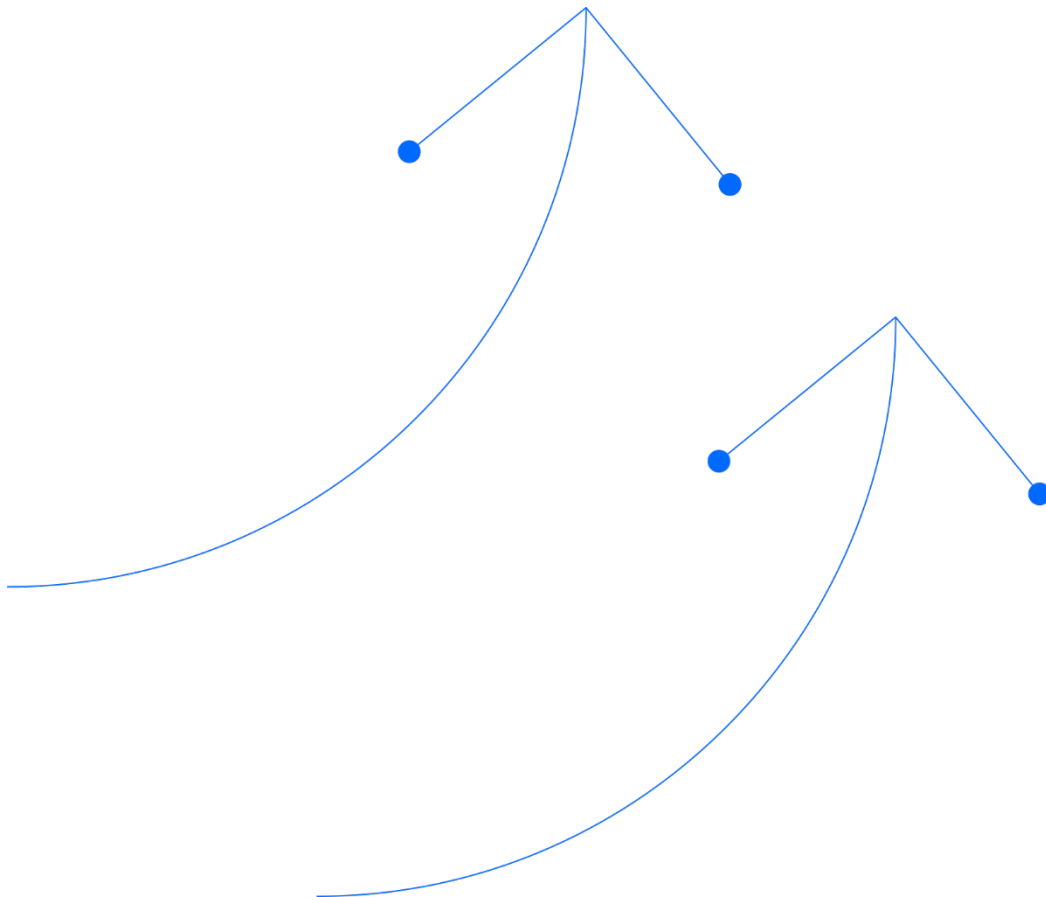


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Terms and abbreviations

Abbreviations	Terms
CoA	Condition of Approval EPBC 2014/7376
Compliance Report	The 2023 EPBC Compliance Report
CRAF	Chemical Risk Assessment Framework
CSG	Coal Seam Gas
D&C	Drilling and Completions
DCCEEW	Commonwealth Department of Climate Change, Energy, the Environment and Water
DPE	Department of Planning and Environment
DPHI	Department of Planning, Infrastructure and Environment
EMS	Environmental Management Strategy
EPBC Act	<i>Environmental Protection and Biodiversity Conservation Act (1999) (Cth)</i>
EPL	Environment Protection Licence
FDP	Field Development Plan
GDE	Groundwater Dependent Ecosystem
GMP	Groundwater Management Plan
ha	hectares
IEA	Independent Environmental Audit
NGP	Narrabri Gas Project (also referred to as the Project)
NSW Approval	The Independent Planning Commission of NSW's Statement of Reasons and Development Consent, for SSD-6456, dated 30 September 2020.
Reporting period	The period 7 February 2023 (the date of commencement) – 31 December 2023
Santos	Santos NSW (Eastern) Pty Ltd
SMS	Santos Management System
SSD	State Significant Development
the Approval	EPBC 2014/7376
the Department	Department of Climate Change, Energy, the Environment and Water (previously the Department of Planning and Environment)
the Minister	The Australian Government Minister administering the EPBC Act including any delegate thereof.
the Project	The Narrabri Gas Project. To develop and operate a coal seam gas field in the Gunnedah Basin, southwest of Narrabri, NSW (see EPBC 2014/7376) Referred to as the Action in EPBC 2014/7376.
Waste MP	Waste Management Plan
WMP	Water Management Plan
WTAG	Water Technical Advisory Group

1. Introduction

On 24 November 2020, Santos NSW (Eastern) Ltd (**Santos**) (ABN: 1 009 321 662) received approval for the Narrabri Gas Project (the Project) (also known as the Action), to develop and operate a coal seam gas field in the Gunnedah Basin, 25 km southwest of Narrabri, NSW under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (**EPBC Act**).

This Compliance Report has been prepared to address the EPBC 2014/7376 approval (the **Approval**), Conditions of Approval (**CoA**) 33 and 34 for the Project. As directed by the definitions of the EPBC Approval, the Compliance Report has been prepared in accordance with the *Annual Compliance Report Guidelines* (Department of the Environment, 2014) (the **Guidelines**).

Santos has also considered the updated *Annual Compliance Report Guidelines* (Department of Climate Change, Energy and Water, 2023) when preparing the Compliance Report.

1.1. Description of activities

The Project is described in referral EPBC No. 2014/7376.

The Project includes the progressive development of up to 850 new gas wells on up to 425 new well pads over approximately 20 years, and the construction and operation of gas processing and water treatment facilities. The Project area covers approximately 950 square kilometres (95,000 hectares [ha]) in size, and the Project footprint will only directly impact approximately 1% of that area. Figure 1 Layout of the Narrabri Gas Project

depicts the Project within the regional context, the Project consent boundary and infrastructure associated with Phase 1 of the Project.

The proposal is staged (as defined in the New South Wales (**NSW**) State Significant Development (SSD) consent 6456 [NSW Approval]) as follows:

- Phase 1, comprising ongoing exploration and appraisal activities;
- Phase 2, comprising construction activities for production wells and related infrastructure;
- Phase 3, comprising gas production operations; and
- Phase 4, comprising gas well and infrastructure decommissioning, rehabilitation and mine closure.

The Project is currently in Phase 1, which involves exploration and appraisal activities, including:

- seismic surveys;
- core and chip holes;
- construction and operation of pilot wells (up to 25 wells on up to 25 well pads across the Project area); and
- pilot well ancillary infrastructure, including access tracks, gas and water gathering lines, water balance tanks, safety flaring infrastructure, utilities and services, and environmental monitoring equipment including groundwater monitoring bores.

In accordance with CoA 3, Santos must notify the Department of Climate Change, Energy, the Environment and Water (the **Department**) in writing of the commencement of each Phase within two business days of the date of the commencement of that phase. Phase 1 of the Project commenced on 7 February 2023 and the Department was notified of the commencement on 8 February 2023. This Compliance Report was prepared on 6 May 2024, and covers activities completed from the date of commencement of the Project to 31 December 2023, herewith referred to as the reporting period.

In accordance with CoA 2, Santos must also notify the Department in writing of the date of completion of each Phase within two business days of the date of completion of that Phase. At the time of writing, Phase 1 of the Project was in progress and has not been completed.

1.2. Declaration of accuracy

In making this declaration, I am aware that sections 490 and 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed:



Full name (please print):



Position (please print):

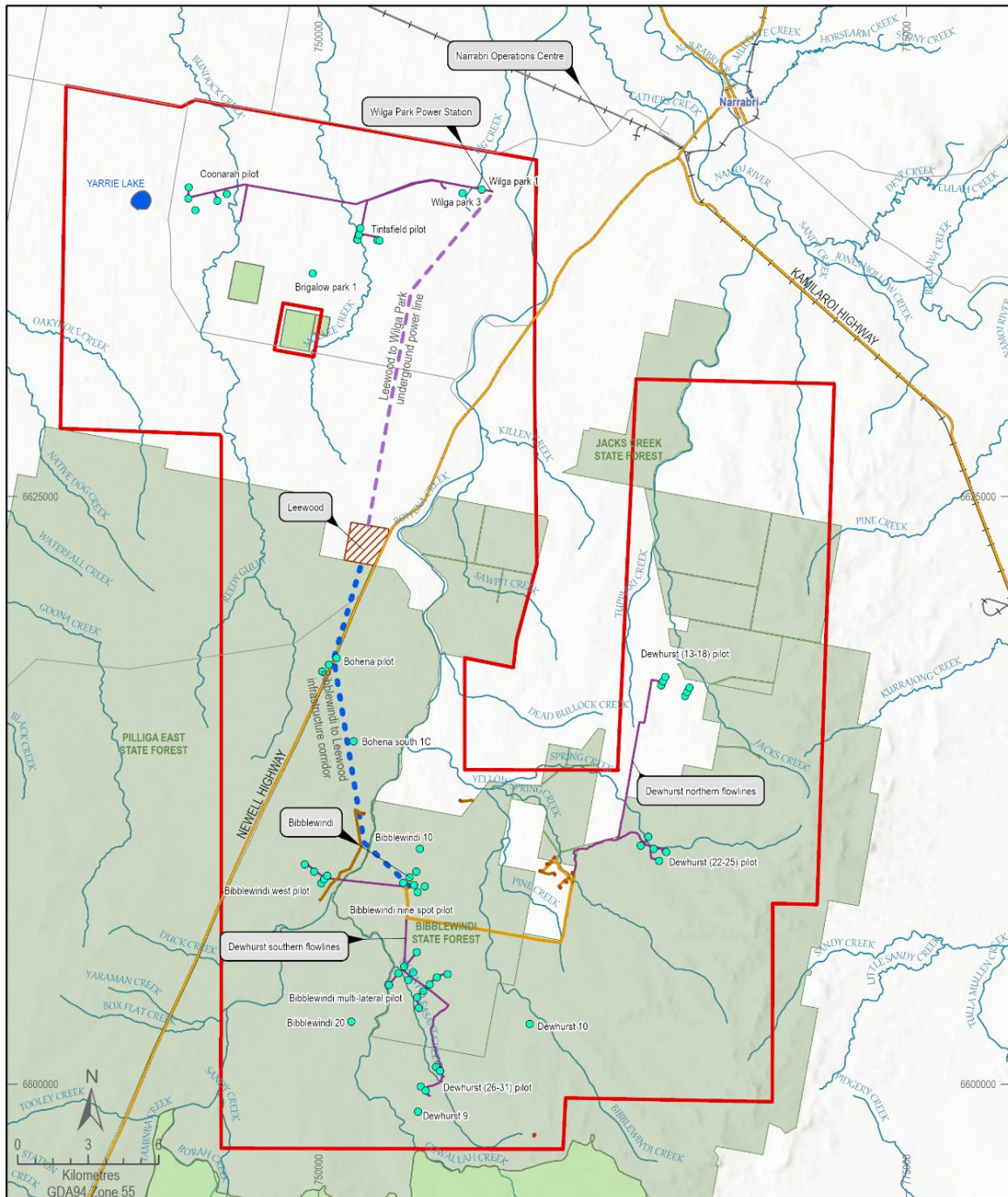
Manager Environment Eastern Australia and Papua
New Guinea

Organisation (please print including ABN/CAN if applicable):

Santos NSW (Eastern) Pty Ltd (ABN: 1 009 321 662)

Date:

3 May 2024



LEGEND

- NGP boundary
- Leewood
- Bibblewindi
- Existing wells
- Existing flowlines
- Phase 1 access roads
- Phase 1 flowlines
- Phase 1 well pads
- Leewood to Wilga Park infrastructure corridor
- Bibblewindi to Leewood infrastructure corridor
- Highway
- Major roads
- Watercourse
- Railway
- State Forest
- Parks and reserves
- Lakes and dams

NARRABRI GAS PROJECT

Figure 1.1
Key Assets and Infrastructure
Phase 1

Figure 1 Layout of the Narrabri Gas Project

1.3. Compliance report overview

Table 1-1 provides an overview of the annual Compliance Report requirements outlined in CoA 33 and 34, and where they are addressed in this Compliance Report.

Table 1-1 Relevant obligations in CoA 33 and 34 and where addressed in this Compliance Report

Relevant obligation	Comment
<p>CoA 33 states:</p> <p>33. <i>The approval holder must prepare a compliance report every calendar year from commencement of the action. The approval holder must:</i></p> <ul style="list-style-type: none"> <i>a. publish each compliance report on the website within 60 business days following the relevant 12 month period;</i> <i>b. notify the Department by email that a compliance report has been published on the website and provide the weblink for the compliance report within 5 business days of the date of publication;</i> <i>c. keep all compliance reports publicly available on the website until this approval expires;</i> <i>d. exclude or redact sensitive ecological data from compliance reports published on the website; and</i> <i>e. where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication.</i> 	<p>This Compliance Report has been prepared for the reporting period from 7 February 2023 to 31 December 2023.</p> <p>The first Compliance Report is due to the Department by 6 May 2024 as outlined in the correspondence from the Department dated 21 March 2023.</p> <p>Regular reporting documentation for the Project, including the Compliance Reports, can be accessed via: https://narrabrigasproject.com.au/about/environment/</p>
<p>CoA 34 states:</p> <p>34. <i>The compliance report must also include a dedicated section on groundwater that includes, but is not limited to, the following information:</i></p> <ul style="list-style-type: none"> <i>a. all relevant interpreted and analysed groundwater monitoring data (including level, pressure and water quality).</i> <i>b. evidence that groundwater performance criteria in the NSW-approved Groundwater Management Plan have been achieved.</i> <i>c. how the management measures committed to in the approved Water Management Plan (WMP) have been effective in achieving performance measures and the outcomes for groundwater resources specified in <u>Appendix B</u>.</i> <i>d. if condition 9 is triggered, a description of any mitigation and management measures implemented to achieve the outcomes specified in <u>Appendix B</u>, and monitoring data showing the effectiveness of those measures.</i> <i>e. a report of all recommendations made by each Water Technical Advisory Group meeting. This must include a statement of how these recommendations have been implemented and where they have not, a statement as to why not.</i> <i>f. evidence that all points in condition B39 (f) (vi) of the NSW approval are not exceeded.</i> 	<p>The reporting requirements of CoA 34 are discussed in section 2.2, and the following subsections:</p> <ul style="list-style-type: none"> • section 2.2.1 – Groundwater monitoring network; • section 2.2.2 – Groundwater monitoring data; • section 2.2.3 – Groundwater performance criteria; • section 2.2.4 – Management measures; • section 2.2.5 – Recommendations – Water Technical Advisory Group; and • section 2.2.6 – NSW Approval – condition B39(f)(vi). <p>The installation of the groundwater monitoring bore network is in progress. No water extraction from new Phase 1 Coal Seam Gas (CSG) pilot wells occurred during the reporting period.</p> <p>In accordance with Environment Protection Licence (EPL) 20350, Santos publishes quarterly EPL groundwater sampling results. The last monitoring data (collected during the 2023-2024 Quarter 3 reporting period) demonstrated that the groundwater system chemistry remained stable. Any minor fluctuations were noted as</p>

Relevant obligation	Comment
<i>Note: Compliance reports may be published on the Department's website</i>	within the statistical range of historical results and within the range of laboratory accuracy. There was no exceedance of any groundwater trigger levels as specified in the Groundwater Management Plan (GMP), as such CoA 9 was not triggered.

1.4. Key personnel

The key personnel responsible for operational and environmental management at the Narrabri Gas Project (**NGP**) during the reporting period are set out in Table 1-2.

Table 1-2 Roles and responsibilities

Position	Responsibility
Area Manager, Arcadia, Scotia and Narrabri Operations	<ul style="list-style-type: none"> reports to the Production Manager – CSG; responsible for the operation of all gas transmission and electricity generation infrastructure; facilitates the environmental performance of the Project is consistent with the CoA the Santos Management System (SMS); and responsible for legislative compliance, observation of contractual obligations and the maintenance of resources to achieve the main objectives of the NGP Environmental Management Strategy (EMS).
Manager Environment Eastern Australia and Papua New Guinea	<ul style="list-style-type: none"> reports to the General Manager Health, Safety and Environment, Eastern Australia and Papua New Guinea; accountable to ensure awareness of the compliance requirements of the NGP EMS; and to facilitate adequate resourcing to advise on the implementation of the EMS and to undertake assurance of compliance in its implementation.
Drilling and Completions (D&C) Project Lead or D&C Manager	<ul style="list-style-type: none"> reports to the Area Manager; responsible for the drilling and development of the well to operational handover; facilitates the environmental performance of the Project is consistent with the CoA and SMS during D&C activities; and responsible for legislative compliance, observation of contractual obligations and monitoring contractor risk controls and assurance activities to achieve the main objectives of the NGP EMS.
Team Leader Narrabri Operations	<ul style="list-style-type: none"> reports to the Area Manager, Arcadia, Scotia and Narrabri Operations; maintains accountability, either directly or by delegation, for the overall management of the Project site and the operation of Project components; and retains responsibility for the conveyance of the NGP EMS and its objectives to all employees and contractors entering site.
Team Leader Onshore Environment	<ul style="list-style-type: none"> reports to the Manager Environment Eastern Australia and Papua New Guinea; maintains responsibility for the implementation, maintenance and monitoring of compliance with the NGP EMS; advises operations, development and drilling & completions management on environmental issues;

Position	Responsibility
	<ul style="list-style-type: none"> • reviews contractor Health, Safety Environment and EMP documentation (where applicable); • oversees the implementation of all management plans, protocols and strategies required under the CoA; • consults with regulatory authorities as required; • facilitates required monitoring is undertaken, in cooperation with the Environmental Advisor; • provides measures for continual improvement to the plans and procedures; • facilitates all personnel undertaking works associated with the EMS are trained and competent; • coordinates training for relevant employees and contractors of the requirements of the EMS; • prepares the annual reports, reviews and returns; • coordinates the development of the site rehabilitation objectives and closure criteria in consultation with key stakeholders; and coordinates the completion of rehabilitation activities; • coordinates the development of annual rehabilitation planning to guide rehabilitation activities; • coordinates the rehabilitation monitoring program and an annual review of monitoring results to provide a continual improvement process for rehabilitation; • liaises with regulatory authorities regarding environment management and community relations; • reviews and updates the environment management documents referred to in the EMS; and • responds to community complaints.
Agricultural Supervisor	<ul style="list-style-type: none"> • reviews soil moisture conditions and arranges irrigation to be undertaken on basis of those reviews; and • reviews weather conditions and arranges irrigation to be undertaken on basis of those reviews.
Environmental Advisor	<ul style="list-style-type: none"> • reports to the Team Leader – Onshore Environment; • maintains accountability for the monitoring of compliance with the EMS; • advises operations field staff on environmental issues; • responsible for assessing, developing and validating the implementation of erosion and sediment plans; • raises environment awareness among Project personnel and contractors via environmental induction presentations, environmental training packages and toolbox talks; • provides environmental training to relevant personnel as required; • coordinates investigations of environmental incidents or complaints; • manages environmental complaints in accordance with the complaints management procedure; • coordinates the management of records and reporting of environmental monitoring and management data; • responsible for site inspections, monitoring and surveys, including but not limited to the following environmental aspects:

Position	Responsibility
	<ul style="list-style-type: none"> • water; • noise; • biodiversity; • rehabilitation; • heritage; and • waste.
Construction Field Supervisor	<ul style="list-style-type: none"> • reports to the Construction Manager, Development; • responsible for the implementation of the EMS, including all approved plans and protocols, during the construction phase; and • communicates the EMS compliance during the construction phase.
D&C Operating Company Representative	<ul style="list-style-type: none"> • reports to the D&C Project Lead or the D&C Manager; • responsible for implementation of the suite of environmental management plans during D&C phase; and • communicates environmental compliance during the D&C phase.
Operator Maintainer, Operations	<ul style="list-style-type: none"> • reports to the Team Leader Narrabri Operations; • maintains accountability for the monitoring of compliance with the environmental obligations during the life of the operation; and • undertakes site inspections, operation and maintenance of field equipment.
Santos personnel and contractors	<ul style="list-style-type: none"> • perform tasks in an environmentally responsible manner; • notify the Environmental Advisor of any environmental incidents and / or exceedances; • undertake all activities in accordance with the EMS; and • participate in site inspections of own work areas as part of a continuous improvement process.

2. Compliance

2.1. Compliance with the Conditions of Approval

A summary of compliance with the remaining CoA, including supporting evidence, is provided in Appendix A – Summary of compliance.

One non-compliance was identified during the reporting period, namely CoA 4(a).

The non-compliance related to updates (including corrections) made to the Field Development Plan (**FDP**), and subsequent notification required to the Department.

Santos identified the non-compliance and immediately rectified by providing the Department with a copy of the approved FDP with notification of the non-compliance. At the time of writing this Compliance Report, the required actions had been completed (see section 2.3 for further discussion of the non-compliance, the action plan and current status).

2.2. Compliance with CoA 34 - Groundwater

This section aims to address all obligations within CoA 34. The obligations within CoA 34 and where these obligations are addressed within this report, is provided in Table 2-1.

Table 2-1 CoA 34 obligations

CoA 34 obligations	Section reference
a. all relevant interpreted and analysed groundwater monitoring data (including level, pressure and water quality).	Section 2.2.1 – Groundwater monitoring network - Details the existing groundwater monitoring network for the NGP and notes any groundwater monitoring sites that were installed during the reporting period. Section 2.2.2 – Groundwater monitoring data - Provides a summary of the groundwater monitoring results during the reporting period.
b. evidence that groundwater performance criteria in the NSW-approved Groundwater Management Plan have been achieved.	Section 2.2.3 – Groundwater performance criteria - Groundwater performance criteria – Provides a summary of NGP’s performance against the groundwater performance criteria during the reporting period.
c. how the management measures committed to in the approved Water Management Plan have been effective in achieving performance measures and the outcomes for groundwater resources specified in Appendix B.	Section 2.2.4 – Management measures - Notes the management measures implemented during the reporting period.
d. if condition 9 is triggered, a description of any mitigation and management measures implemented to achieve the outcomes specified in Appendix B, and monitoring data showing the effectiveness of those measures.	CoA 9 was not triggered during the reporting period as there were no exceedances of groundwater trigger levels. As such, CoA 34(d) is not applicable.
e. a report of all recommendations made by each Water Technical Advisory Group meeting. This must include a statement of how these recommendations have been implemented and where they have not, a statement as to why not.	Section 2.2.5 – Recommendations – Water Technical Advisory Group - Lists all WTAG recommendations made during the reporting period.
f. evidence that all points in condition B39 (f) (vi) of the NSW approval are not exceeded.	Section 2.2.6 – NSW Approval – Condition B39(f)(vi) - Provides a summary of the compliance with the condition.

2.2.1. Groundwater monitoring network

As this was the first year of Phase 1 of the Project, operation of the groundwater monitoring network focused on establishing a monitoring network for future groundwater monitoring and modelling, especially to inform groundwater management in Phase 2, and meeting the conditions of EPL 20350.

During the reporting period, Santos installed the following groundwater monitoring bores:

- two bores at Bohena South 1C (Bore ID: BHNS1PRLS01, and BHNS1PRDGY02);
- two bores at Bibblewindi 6 (Bore ID BWD6PRLPS01) and BWD6PRDGY02);
- two bores at Dewhurst 9 (Bore ID DWH9PRLPS01 and DHW9PRDGY02);
- two bores at Dewhurst 43 (Bore ID DWH43PRLPS01 and DHW43PRDGY02); and
- two bores at Dewhurst 35 (Bore ID DHW35PRDGY01 and Bore ID DWH35PRLPS01).

Santos will continue the installation of the groundwater monitoring network during Phase 1. Analysis of the groundwater monitoring data from new bores, and any future monitoring bores, will be included in the 2024 Compliance Report.

Napperby Sandstone monitoring network

Santos has one active groundwater monitoring bore within the Napperby Sandstone.

The groundwater monitoring bores installed within the reporting period target the Digby Formation. Monitoring within the Digby Formation is considered to be more conservative insofar that it is closer to the coal than the Napperby Sandstone Formation. Therefore, any change in the Digby Formation will demonstrate whether there is likely to be a change in the overlying Napperby Formation.

The approved GMP broadly describes the Level 2 trigger for Phase 1 as ‘*occurrence of greater than expected depressurisation of the Napperby Sandstone or Digby Formation*’, which are some of the shallowest and youngest formations in the Gunnedah Oxley Basin sediments and above the target coal measures.

A Level 2 trigger occurs if groundwater level drawdown in the Napperby Sandstone or Digby Formation exceeds 0.5 m throughout Phase 1 of the Project.

At least three years of groundwater level monitoring data will be collected at each bore location to establish baseline levels.

The groundwater monitoring bores that will be used to monitor groundwater pressures against the Level 2 trigger described above are shown on Table 2-2.

Table 2-2 Phase 1 nominated groundwater drawdown monitoring triggers (Level 2)

Monitoring point name	Monitored formation	Status
TULPRDGY02	Digby Formation	Active
BHNS1PRDGY02	Digby Formation	Installed
BWD6PRDGY02	Digby Formation	Installed
DWH9PRDGY02	Digby Formation	Installed
DWH43PRDGY02	Digby Formation	Installed
GW971623-1	Digby Formation	Active
DWH35PRDGY02	Digby Formation	Installed

2.2.2. Groundwater monitoring data

As noted above, the installation of the groundwater monitoring bore network is in progress. No new Phase 1 CSG pilot wells were drilled during the reporting period and as such no water extraction from new Phase 1 CSG pilot wells occurred during the reporting period. Therefore, the ongoing assessment of monitoring data has not commenced, and the groundwater trigger levels were not applicable during the reporting period.

Santos publish quarterly EPL groundwater sampling results on the Resources Library website (<https://waterportal.santos.com/>). The next reporting period for the annual return is from 1 May 2023 to 30 April 2024.

The last monitoring data (collected during the 2023-2024 Quarter 3 reporting period) demonstrated that the groundwater system chemistry remained relatively stable:

- Groundwater levels within the Digby Formation showed downward trends, however it was noted groundwater monitoring points in the Digby Formation are too shallow to be affected by operations.
- Groundwater levels at deeper groundwater monitoring bores (i.e. closer to the target coal seams) remained stable during the reporting period confirming the source of depressurisations in the Digby Formation are not via deeper formations.
- Groundwater quality remained relatively stable during the reporting period and any minor fluctuations were noted as within the statistical range of historical results and within the range of laboratory accuracy.

Any minor fluctuations were noted as within the statistical range of historical results and within the range of laboratory accuracy.

2.2.3. Groundwater performance criteria

Predictions made by the groundwater model are the primary tool for determining if the groundwater performance criteria identified in the GMP have been exceeded in Phase 1. The GMP outlines three types of trigger levels (Level 1, 2 and 3) which act as 'early warning' triggers for further assessment of groundwater impact, based on elevated levels of risk. The GMP notes that, throughout Phase 1, if these triggers are not exceeded, then current model predictions of impact to groundwater due to extraction of CSG water are considered reliable.

The GMP establishes that groundwater monitoring (including trigger monitoring) must be in place prior to extraction of CSG water as modelled for Phase 1. In this context, the requirement to commence trigger monitoring and review of the performance criteria is considered to comprise the operation of the new Phase 1 CSG pilot wells. New CSG pilot wells proposed to be constructed during Phase 1 of the NGP have not yet been drilled. CSG water production across the project area currently comprises a relatively minor rate of water production from existing CSG wells.

Santos will undertake groundwater monitoring to verify the model predictions are accurate and reliable when the monitoring points are constructed and active. During the reporting period, the groundwater trigger levels in the GMP were not applicable as no pilot wells relevant to the Project were operating, and the monitoring bores which will be constructed in Phase 1 are not yet active. The outcomes and sub-outcomes specified in Appendix B of the Approval are consistent with the groundwater triggers outlined in the GMP.

2.2.4. Management measures

During the reporting period, Santos implemented all relevant management measures in accordance with the GMP. As noted above, the groundwater trigger levels were not applicable during the reporting period as no pilot wells relevant to the Project were operating.

Santos will continue to manage groundwater through further development of the Project in accordance with the GMP, relevant licences, leases, and any other statutory approvals for the Project.

2.2.5. Recommendations – Water Technical Advisory Group

The Water Technical Advisory Group (WTAG) held two meetings during the reporting period on 14 February 2023 and 16 November 2023.

A summary of their recommendations and how they have been implemented is provided in Table 2-3.

Table 2-3 Water Technical Advisory Group Recommendations and Implementation

Meeting	WTAG Recommendation	Implementation
14 February 2023	No recommendations	Not applicable
16 November 2023	No recommendations	Not applicable

Comments provided by the WTAG on the draft Phase 1 WMP and Phase 1 GMP were addressed and implemented into the relevant plans prior to finalisation and subsequent approval from the former Department of Planning and Environment (DPE). A summary of the correspondence and response to the comments provided by the WTAG is provided in Appendix A of both plans.

2.2.6. NSW approval - Condition B39(f)(vi)

Condition B39(f)(vi) requires the groundwater model for the development to be updated periodically, to the satisfaction of the NSW Planning Secretary. When a groundwater model update occurs, the updated model must include 'consideration of the predicted impacts against the:

- previous model predictions and monitoring results;
- water management performance measures in Table 7 (of the NSW Approval);
- minimal harm considerations in the NSW Aquifer Interference Policy; and
- groundwater management response triggers in the WMP.'

The groundwater monitoring triggers outlined in the GMP determine if the groundwater model needs to be revised. Throughout Phase 1, if the triggers are not exceeded, then current model predictions are considered reliable. As noted above, the groundwater trigger levels were not applicable during the reporting period as no pilot wells relevant to the Project were operating.

In accordance with Condition B39(f)(vi), Santos will update the groundwater model prior to the commencement of Phase 2 of the Project, and at least every three years thereafter. Following the update of the groundwater model, Santos will consider whether the predicted impacts exceed the criteria listed in Condition B39(f)(iv) and will report the findings in the relevant Compliance Report.

2.3. Non-compliances

One non-compliance was identified during the reporting period. A summary of the non-compliance, the action plan and status is provided in Table 2-4. A summary of compliance with the remaining CoA, including supporting evidence, is provided in Appendix A – Summary of compliance.

Table 2-4 Non-compliance details and proposed action plan

CoA	Cause	Action Plan	Status
CoA 4(a)	<p>The revised FDP was approved by DPE on 28 November 2023.</p> <p>A copy of the approved FDP was provided to the Department on 31 January 2024.</p> <p>In accordance with CoA 4(a), a copy of the FDP was required to be provided to the Department within 10 business days of the plan being approved, that being 6 December 2023.</p>	<p>The Department was notified via email correspondence of the non-compliance on 18 March 2024.</p>	Closed

2.4. Amendments to plans

A minor revision to the FDP approved for Phase 1 of the Project was undertaken in the reporting period due to a change of location to the Dewhurst 34 well pad and associated access track. The location for the well pad and access track has been moved from private property to within the Bibblewindi State Forest. A Forest Permit under the *Forestry Act 2012* (NSW) is in place which authorises the well pad and access track within the State Forest. Forestry Corporation NSW will be notified of the works in accordance with the notification requirements of the Forest Permit.

In addition to the change to the location, the area of disturbance for the well pad and access track has reduced by 0.31 ha. As such, this change did not require additional ecosystem credits to be retired.

The FDP was amended throughout to ensure that figures and references to Dewhurst 34 are accurate and reflect this location change.

The Department was notified of the amended FDP on 31 January 2024.

Santos is progressing the revision to the remaining Phase 1 management plans, where necessary, to account for the change to the location of the Dewhurst 34 well pad and access track. The revision to the Phase 1 management plans will be reported in the 2024 Compliance Report.

2.5. New environmental risks

There were no new environmental risks identified in the reporting period.

3. Conclusion

This Compliance Report was prepared on 6 May 2024, and covers activities completed in the period from 7 February 2023 (the date of Project commencement) to 31 December 2023. A review of compliance with the CoA was completed.

One non-compliance was identified during the reporting period.

Appendix A – Summary of compliance

Table A-1 Compliance with CoA of EPBC Act Approval No. 2014/7376

CoA	Is the Project compliant with this CoA?	Evidence/Comments
<p>1. The approval holder must undertake the action as described in and in accordance with the NSW approval.</p>	<p>Compliant</p>	<p>Santos is undertaking the Project in accordance with the NSW approval. The NGP Independent Environmental Audit (IEA) 2023 (for the period of 30 September 2020 to 15 September 2023) found that Santos was:</p> <ul style="list-style-type: none"> compliant with 131 out of 133 applicable conditions; and non-compliant with two conditions in the NSW approval. <p>The non-compliances related to the following conditions of the NSW approval, being administrative in nature:</p> <ul style="list-style-type: none"> not meeting the content requirements of the Waste MP as prescribed by condition B70 (g) and B70 (h)(ii); and not having all published versions of statutory approvals on the Santos NGP website as required by condition D13 (a)(ii). Since the release of the NGP IEA 2023 report, Santos has resolved both non-compliances with the NSW approval. <p>The SSD 6456 NGP 2023 Annual Review provides a summary of the environmental performance during the period 7 February 2023 to 31 December 2023. The SSD 6456 NGP 2023 Annual Review found that Santos was compliant with the NSW approval.</p> <p>The NGP IEA 2023 report and SSD 6456 NGP 2023 Annual Review can be accessed via: https://narrabrigasproject.com.au/about/environment/</p>
<p>2. The approval holder must not clear more than 989 ha of native vegetation within the project area and must not clear outside the project area.</p>	<p>Compliant</p>	<p>The surface disturbance that occurred in Phase 1 during the reporting period was 2.92 ha. No vegetation was cleared outside the Project Area, as evidenced in the SSD 6456 NGP 2023 Annual Review.</p>
<p>3. The approval holder must notify the Department in writing of the date of commencement of each Phase within 2 business days of the date of commencement of that Phase. The approval holder must notify the Department in writing of the date of completion of each Phase within 2 business days of the date of completion of that Phase.</p>	<p>Compliant</p>	<p>Compliance is evidenced in the commencement letter to the Department dated 8 February 2023 and the acknowledgement of commencement letter from the Department dated 21 March 2023.</p> <p>A copy of the correspondence is provided in Appendix B.</p>

CoA	Is the Project compliant with this CoA?	Evidence/Comments
<p>4. To minimise impacts on protected matters, the approval holder must comply with conditions B1-B6 of the NSW approval relating to gas field development. The approval holder must:</p> <ul style="list-style-type: none"> a. Provide a copy of the approved Field Development Protocol required by condition B2 of the NSW approval and the Field Development Plan required by condition B4 of the NSW approval to the Department within 10 business days of them (and of any subsequent approved revised version of either plan) being approved by the NSW Government. b. Prior to the commencement of Phase 2, provide to the Department shapefiles of the approved location of all infrastructure. 	<ul style="list-style-type: none"> a. Non-compliant b. Not applicable 	<p>During the reporting period, the FDP was revised to incorporate a change of location to the Dewhurst 34 well pad and associated access tracks. The revised FDP was approved by DPE on 28 November 2023.</p> <p>In accordance with CoA 4(a), a copy of the FDP was required to be provided to the Department within 10 business days of the plan being approved, that being 6 December 2023.</p> <p>A copy of the approved FDP was provided to the Department on 31 January 2024. The Department was notified of the non-compliance via email correspondence on 18 March 2024. The provision of the FDP to the Department outside of the prescribed timeframe was an oversight in the reporting requirements of the Approval.</p> <p>As discussed in sections 2.1 and 2.3, at the time of writing this Compliance Report, the required actions had been completed.</p> <p>CoA 4(b) is not applicable for this reporting period as the Project is currently in Phase 1.</p>
<p>Water Resources</p>		
<p>5. For the protection of water resources, the approval holder must comply with conditions A15-A17 and B26-B42 of the NSW approval relating to water management.</p> <p>The approval holder must achieve and maintain the performance measures in the NSW approval to demonstrate that the outcomes and sub-outcomes specified in Appendix B are being achieved and maintained.</p>	<p>Compliant</p>	<p>During the reporting period, Santos complied with conditions A15-A17 (maximum volume of produced water, gas well integrity and hydraulic fracturing) and B26-B42 (sediment and erosion control, water supply, water management, groundwater modelling and water management plan), and the relevant performance measures in the NSW approval. This is evidenced in the SSD 6456 NGP 2023 Annual Review, which can be accessed via: https://narrabrigasproject.com.au/about/environment/</p>

CoA	Is the Project compliant with this CoA?	Evidence/Comments
<p>6. The approval holder must provide the Department with the approved WMP required by condition B41 of the NSW approval within 2 business days of its approval by the NSW Planning Secretary. The approval holder must notify the Department within 2 business days of any proposed changes to the approved WMP. If the NSW Planning Secretary approves a revised version of the WMP, the approval holder must provide the Department with the approved revised WMP within 2 business days of its approval by the NSW Planning Secretary.</p>	<p>Compliant</p>	<p>Compliance with the submission of the WMP to the Department is evidenced in the email correspondence titled 'Narrabri Gas Project, NSW EPBC 2014/7376 – Management Plan submissions' dated 21 November 2022. Santos also publish the approved WMP on the Project's website, which can be accessed via: https://narrabrigasproject.com.au/about/environment/</p>

CoA	Is the Project compliant with this CoA?	Evidence/Comments
<p>7. The approval holder must establish an early warning monitoring system to detect groundwater pressure changes in deeper hydrostratigraphic units, so as to be able to take corrective actions in sufficient time to prevent impacts in shallow productive aquifers and Groundwater Dependent Ecosystem (GDE)s. In addition to the monitoring requirements specified in the approved GMP required under condition B41 of the NSW approval, the approval holder must:</p> <ul style="list-style-type: none"> a. Establish and maintain a network of groundwater monitoring bores across the project area in the Napperby Sandstone. In the project area where the Napperby Sandstone is in direct contact with the Namoi Alluvium, an appropriate network of groundwater monitoring bores must also be established and maintained in those areas in the Digby Formation. These monitoring bores must be installed prior to the commencement of Phase 2; b. Monitor groundwater levels in these bores at a minimum of 3-monthly intervals from the commencement of Phase 1 or bore construction (whichever is first) until the completion of the action; and c. Publish all groundwater monitoring data from all bores, updated to add the most recent readings each quarter, on the website, and maintain that data on the website until the completion of the action. The monitoring data must include hydrographs for all monitoring bores and explain what the data means in relation to the groundwater performance criteria specified in the NSW-approved GMP. 	<p>Compliant</p>	<p>During the reporting period, Santos continued to establish the groundwater monitoring system in accordance with the GMP. Santos complied with CoA 7 as evidenced below:</p> <ul style="list-style-type: none"> • CoA 7(a) was not triggered during the reporting period as Phase 2 of the Project has not commenced; • In accordance with CoA 7(b), groundwater levels are monitored at a minimum of 3 monthly intervals (e.g. daily, weekly, or every 3 months); and • In accordance with CoA 7(c), groundwater monitoring data is published on the Santos website. This can be accessed via: http://map.santoswaterportal.com.au/.

CoA	Is the Project compliant with this CoA?	Evidence/Comments
<p>8. If, at any time until the end date of this approval:</p> <ul style="list-style-type: none"> a. the approval holder detects an exceedance of any groundwater performance criterion (including trigger levels), specified in the approved Groundwater Management Plan required by condition B41 of the NSW approval; and/or b. the groundwater model, including any update required under condition B39 of the NSW approval, predicts an exceedance of the groundwater performance criteria (including trigger levels), specified in the approved Groundwater Management Plan; <p>the approval holder must notify the Department of the exceedance within 10 business days of detecting or predicting the exceedance.</p>	<p>Not applicable</p>	<p>As noted in section 2.2, CoA 8 was not triggered during the reporting period as Santos did not exceed any of the groundwater performance criteria specified in the GMP. The groundwater model was not updated during the reporting period.</p>
<p>9. The approval holder must, within 6 months of detecting or predicting an exceedance as described in condition 8, publish on the website a report describing:</p> <ul style="list-style-type: none"> a. all potential and actual impacts to water resources arising from the exceedance; b. any further investigations undertaken to determine the cause of and remedy for the exceedance; and c. the mitigation and management measures that the approval holder has taken and proposes to take to reverse the exceedance, including data demonstrating the effectiveness of the mitigation and management measures. <p>The approval holder must notify the Department within 2 business days of the report being published and retain the report on the website for the life of the approval</p>	<p>Not applicable</p>	<p>CoA 9 was not triggered during the reporting period as an exceedance, as described in CoA 8 did not occur.</p>

CoA	Is the Project compliant with this CoA?	Evidence/Comments
<p>10. If, after the implementation of condition 9 the approval holder detects or predicts that the outcomes specified in Appendix B cannot or will not be achieved, or the Minister considers that the outcomes specified in Appendix B cannot or will not be achieved, then the approval holder must provide a site-specific assessment for the Minister’s written approval within 3 months of making the prediction or of receiving a request from the Minister.</p>	<p>Not applicable</p>	<p>CoA 10 was not triggered during the reporting period as the requirements of CoA 9 were not required to be implemented.</p>
<p>11. Each site-specific assessment must incorporate data collected from the groundwater monitoring bores required by condition 7 and be prepared by a suitably qualified water resources expert to derive a scientifically-robust cease-work limit. Each site-specific assessment must include justification for how the outcomes specified in Appendix B will be achieved and maintained and include:</p> <ul style="list-style-type: none"> a. multiple lines of evidence and field data to support the assessment of the environmental value and groundwater-dependence of any potential GDEs identified in the area of predicted impact; b. conceptual modelling, including a review of all historical monitoring data to determine the stressor-response relationships for any potential GDEs and consideration of potential contributing activities; c. local scale numerical modelling with consideration of potential contributing activities and identification of potential contributing well/s; and d. a peer review undertaken by an independent suitably qualified water resources expert including details of how the approval holder has addressed any inadequacies raised in the peer review. 	<p>Not applicable</p>	<p>CoA 11 was not triggered during the reporting period as CoA 7(a) was not triggered during the reporting period given that Phase 2 of the Project has not commenced.</p>

CoA	Is the Project compliant with this CoA?	Evidence/Comments
12. The approval holder must publish each site-specific assessment approved by the Minister on its website within 5 business days of receiving approval for the site-specific assessment and for the remainder of the life of the action.	Not applicable	CoA 12 was not triggered during the reporting period as CoA 11 was not triggered.
13. The Minister may specify an interim cease-work limit to manage groundwater impacts where the Minister is not satisfied that the cease-work limit proposed by the approval holder in accordance with condition 11 will ensure the outcome/s specified in Appendix B will be, or are likely to be, achieved and maintained.	Not applicable	A cease-work limit was not received during the reporting period. As such, CoA 13 was not triggered.
14. If the approval holder detects or is informed that a cease-work limit has been exceeded the approval holder must, in addition to the incident reporting requirements of condition 35, provide in writing details of the contributing well/s to the Department within 10 business days of the detection or of being informed.	Not applicable	A cease-work limit was not received during the reporting period. As such, CoA 14 was not triggered.
15. Unless otherwise notified by the Minister in writing, the approval holder must cease groundwater extraction associated with any contributing well/s within 10 business days of reporting the exceedance of a cease-work limit to the Department.	Not applicable	A cease-work limit was not received during the reporting period. As such, CoA 15 was not triggered.
16. If the approval holder has been required to cease groundwater extraction pursuant to condition 15 the approval holder must implement corrective actions so as to achieve and maintain the outcomes and sub-outcomes specified in Appendix B.	Not applicable	Santos was not required to cease groundwater extraction pursuant to CoA 15 during the reporting period. As such, CoA 16 was not triggered.

CoA	Is the Project compliant with this CoA?	Evidence/Comments
<p>17. The approval holder must not recommence groundwater extraction from any contributing well/s until it can be demonstrated that the outcomes and sub-outcomes specified in Appendix B are being achieved and the Minister approves in writing groundwater extraction from those contributing well/s.</p>	<p>Not applicable</p>	<p>Santos was not required to cease groundwater extraction pursuant to CoA 15 during the reporting period. As such, CoA 17 was not triggered.</p>
<p>Chemicals management</p>		
<p>18. To minimise impacts on water resources, the approval holder must comply with conditions B67-B71 of the NSW approval relating to chemicals and waste.</p>	<p>Compliant</p>	<p>During the reporting period, potential waste impacts associated with the Project were managed in accordance with conditions B67-B71 of the NSW approval. Santos complied with conditions B67-71 of the NSW approval as evidence below:</p> <ul style="list-style-type: none"> • Requirements under condition B67 are outlined within the approved Waste MP. During the reporting period, Santos operated and managed waste generated by the Project in accordance with the Waste MP. This is evidenced within the SSD 6456 NGP 2023 Annual Review, which can be accessed via: https://narrabrigasproject.com.au/about/environment/ • In accordance with condition B68, Santos did not receive waste in the Project Area for storage, treatment, processing, reprocessing or disposal; • In accordance with condition B69, Santos prepared a Produced Salt and Beneficial Reuse and Disposal Study in October 2022 (i.e. prior to the commencement of Phase 1). This report was approved by DPE on 11 November 2022; and • In accordance with conditions B70 and B71, Santos prepared a Waste MP which was approved by DPE prior to the commencement of Phase 1. Santos operates and manages waste generated by the Project in accordance with the Waste MP. <p>Notwithstanding, the SSD 6456 NGP IEA 2023 (for the period of 30 September 2020 to 15 September 2023) found that the Waste MP did not satisfy paragraphs (g) and (h)(ii) of condition B70 of the NSW approval in that the Plan:</p>

CoA	Is the Project compliant with this CoA?	Evidence/Comments
		<ul style="list-style-type: none"> • Did not describe the waste management system in detail, including a contingency strategy if beneficial reuse and/or disposal options become unavailable (condition B70(g)); and • Did not define what constitutes a waste-related incident or non-compliance and does not include a protocol for identifying and notifying DPHI and relevant stakeholders of these events (condition B70(h)(ii)).
<p>19. The approval holder must, prior to the commencement of coal seam gas operations, submit to the Minister for written approval a Chemical Risk Assessment Framework (CRAF) that details how the risk of adverse impacts on protected matters posed by chemicals will be assessed and managed for the duration of this approval. The CRAF must include, but is not limited to:</p> <ol style="list-style-type: none"> a. Details of how these risks will be assessed consistent with best practice risk assessment methodologies, and how assessment will address: <ol style="list-style-type: none"> i. the process lifecycle for chemicals; ii. how risk from geogenic chemicals in recovered drilling fluids will be managed to prevent adverse impacts to protected matters; and iii. minimum mitigation and management measures to be undertaken as part of coal seam gas operations. b. Details of the criteria by which chemicals will be categorised, based on the properties of each chemical. Criteria must include, but not be limited to: <ol style="list-style-type: none"> i. combined persistence, bioaccumulative and toxicity assessment; 	<p>Compliant</p>	<p>Compliance is evidenced in the development of the CRAF and approval letter from the Department dated 8 August 2022.</p> <p>The Project commenced on 7 February 2023 which is after the approval of the CRAF by the Department.</p> <p>The CRAF can be accessed via: https://www.santos.com/about-us/corporate-governance/public-notice/</p> <p>See Appendix C for a copy of the approval letter.</p>

CoA	Is the Project compliant with this CoA?	Evidence/Comments
<ul style="list-style-type: none"> ii. chemical database of concern assessment; and iii. specific persistence, bioaccumulative and toxicity assessment. <p>These details must be used to determine the risk assessment requirements appropriate to all chemicals in each category. This will include consideration of toxicological profile, qualitative risk assessment, quantitative risk assessment and site-specific information requirements.</p> <ul style="list-style-type: none"> c. Detail a risk assessment process for each chemical to determine risk to protected matters from the chemical's use. This process must: <ul style="list-style-type: none"> i. identify the risk assessment requirements based on the chemical's category; ii. consider the chemical's intended use and function, and an estimation of the quantity of the chemical likely to be used, and at what concentration, in a typical year; iii. consider the likely environmental fate of the chemical; and iv. consider what, if any, mitigation and management measures are needed to prevent adverse impacts to protected matters from that chemical for the duration of this approval. d. Details of the process by which risk assessments for low risk chemicals will be peer reviewed by an independent chemical risk assessment expert. This process must: <ul style="list-style-type: none"> i. consider any checklists completed by the independent chemical risk assessment 		

CoA	Is the Project compliant with this CoA?	Evidence/Comments
<p>expert, to demonstrate that risks have been adequately assessed; and</p> <ul style="list-style-type: none"> ii. include provision of a signed and dated statement from the independent chemical risk assessment expert confirming that the chemical has been correctly categorised. e. Detail a process for recording each chemical's risk assessment in a register on the approval holder's website and for the provision of each chemical's risk assessment to the Department. f. Details of a process to monitor and report on the implementation of any mitigation and management measures undertaken during use and handling of chemicals to demonstrate no adverse impacts to protected matters, including processes to notify the Department if an adverse impact to protected matters is detected. g. Details of the process by which information in the risk assessments will be adaptively used to address any accidental release of a chemical to prevent adverse impacts to protected matters. 		
<p>20. The approval holder must not commence coal seam gas operations until the CRAF has been approved by the Minister in writing. The approval holder must implement the approved CRAF for the duration of this approval and publish the CRAF on its website within 20 business days of it being approved by the Minister and for the duration of this approval.</p>	<p>Compliant</p>	<p>No operations commenced prior to the approval of the CRAF in August 2022. The CRAF was published on the Santos website within 20 business days of its approval.</p> <p>This is evidenced in the CRAF approval letter dated 8 August 2022. See Appendix C for a copy of the approval letter. The CRAF documentation can be accessed via: https://www.santos.com/about-us/corporate-governance/public-notice/</p>

CoA	Is the Project compliant with this CoA?	Evidence/Comments
<p>21. The approval holder must not use a low risk chemical until that chemical’s risk assessment has been recorded in the register and it has been provided to the Department as required by the approved CRAF.</p>	<p>Compliant</p>	<p>No low risk chemicals were used prior to the approval of NGP’s ‘Register of Assessed Chemicals’. This is evidenced in the NGP’s ‘Register of Assessed Chemicals’ itself and the email correspondence between Santos and the Department in the email thread “EPBC 2014-7376 – notification of low risk chemicals” dated 14 September 2022, 19 September 2022, and 25 November 2022.</p> <p>The Register of Assessed Chemicals documentation can be accessed via: https://www.santos.com/about-us/corporate-governance/public-notice/</p>
<p>22. The approval holder must not use a high risk chemical until the Minister has approved that chemical’s risk assessment in writing and the risk assessment has been recorded in the register as required by the approved CRAF.</p>	<p>Compliant</p>	<p>No high risk chemicals were used prior to the approval of NGP’s ‘Register of Assessed Chemicals’. This is evidenced in:</p> <ul style="list-style-type: none"> • the NGP’s ‘Register of Assessed Chemicals’; • the approval letter for the use of hydrochloric acid dated 11 July 2023; and • the approval letter for the use of Tetrahydro-3,5-dimethyl-1,3,5-thiadiazine-2-thione (Dazomet) / Methyl isothiocyanate (MITC) and glutaraldehyde dated 27 October 2022. <p>The Register of Assessed Chemicals documentation can be accessed via: https://www.santos.com/about-us/corporate-governance/public-notice/ See Appendix D for copies of the approval letters.</p>

CoA	Is the Project compliant with this CoA?	Evidence/Comments
<p>23. The approval holder must engage a chemical risk assessment expert to peer review all risk assessments at least once every 5 years, commencing from the date of the Minister’s approval of the CRAF. The peer review of all risk assessments must be completed before the end of each 5-year anniversary of the Minister’s approval of the CRAF. The peer review must include:</p> <ul style="list-style-type: none"> a. an assessment of whether all risk assessments on the register are consistent with current scientific knowledge; b. an evaluation of the adequacy of relevant monitoring, mitigation and management measures that have been implemented by the approval holder; and c. an explanation of how the approval holder will address or has addressed any concerns raised by the peer review. 	<p>Not applicable</p>	<p>The approved CRAF is dated 1 April 2022. The peer review of the CRAF is due within 5 years of this date, being prior to 1 April 2027. Santos will engage a chemical risk assessment expert to conduct a review of all the risks assessments prior to April 2027 (i.e. 5 years following the date of the approved CRAF).</p>
<p>24. The approval holder must, within 60 business days of the completion of the peer review, submit to the Department a signed statement by the chemical risk assessment expert detailing the findings of the 5-year peer review and evidence of how any concerns raised by the peer review have been addressed.</p>	<p>Not applicable</p>	<p>The peer review of the CRAF is due prior to April 2027. Santos will submit the outcomes of the risk assessment review to the Department within 60 business days following the review.</p>
<p>Threatened species and communities</p>		

<p>25. The approval holder must comply with conditions B43 - B52 of the NSW approval as they relate to the following protected matters:</p> <ul style="list-style-type: none"> a. Brigalow woodland; b. Weeping Myall woodland; c. Regent Honeyeater; d. Koala; e. Spotted-tail Quoll; f. Swift Parrot; g. Superb Parrot; h. South-eastern Long-eared Bat; i. Pilliga Mouse; j. Bertya opponens; k. <i>Lepidium aschersonii</i>; l. <i>Lepidium monoplocoides</i>; m. <i>Androcalva procumbens</i>; and n. <i>Tylophora linearis</i>. 	<p>Compliant</p>	<p>During the reporting period, Santos complied with conditions B43-B52 of the NSW Approval (where triggered) as evidenced below:</p> <ul style="list-style-type: none"> • In accordance with conditions B43 and B44 of the NSW Approval, Santos retired the required ecosystem, and fauna and flora species credits prior to the commencement of Phase 1. This is evidenced by the following: <ul style="list-style-type: none"> – Correspondence from Santos to the NSW Government on 20 January 2023 providing evidence of the Biodiversity Credit Retirement and reconciliation table against the Biodiversity Offset Scheme; and – Confirmation from the NSW Government on 1 February 2023 for the receipt of the evidence of the Biodiversity Credit Retirement. • Update of the Biodiversity Offset Strategy to reflect minor changes due to a change of location to the Dewhurst 34 well pad and associated access track. • Conditions B45 and B46 of the NSW Approval were not triggered during the reporting period as Phase 2 of the Project has not commenced; • In accordance with condition B47 of the NSW Approval, the calculation of credits was consistent with the <i>Framework for Biodiversity Assessment of the NSW Biodiversity Offset Policy for Major Projects</i> and the calculations derived for the Project; • Conditions B48 and B49 of the NSW Approval were not triggered during the reporting period as the Project is in Phase 1; • In accordance with condition B50 of the NSW Approval, Santos established a Biodiversity Advisory Group prior to the commencement of Phase 1. The Biodiversity Advisory Group met twice in 2021, three times in 2022 and twice during the reporting period; and • In accordance with conditions B51 and B52 of the NSW Approval, Santos prepared a Biodiversity Management Plan (BMP) which was approved by DPE prior to the commencement of Phase 1. Santos operates in accordance with the BMP to avoid, minimise, mitigate, rehabilitate and offset impacts on biodiversity values of the Project. <p>The above is evidenced by the NGP IEA 2023 report and SSD 6456 NGP 2023 Annual Review which can be accessed via: https://narrabrigasproject.com.au/about/environment/</p>
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CoA	Is the Project compliant with this CoA?	Evidence/Comments
<p>26. The approval holder must, prior to any exceedance of Phase 2 credits specified in Tables 8-10 of the NSW approval, advise the Department in writing of the actual impacts to any protected matters listed in condition 25 (a-i), or modelled impacts for protected matters listed in condition 25 (j-n), and the residual credits to be retired for protected matters.</p>	<p>Not applicable</p>	<p>CoA 26 was not triggered during the reporting period as Phase 2 of the Project has not commenced.</p>
<p>27. Prior to the commencement of Phase 3, the approval holder must provide the Department with:</p> <ul style="list-style-type: none"> a. shapefiles and other identifying information, as agreed to in writing by the Department, of all records of protected matters located during surveys undertaken for the assessment of the action and for in-field micro-siting; b. shapefiles of the actual clearance areas for each of the protected matters; and c. a copy of either the credit retirement report or statement of assessment of reasonable equivalence issued by BCD and shapefiles of the final offset/s. 	<p>Not applicable</p>	<p>CoA 27 was not triggered during the reporting period as Phase 3 of the Project has not commenced.</p>
<p>Commonwealth land</p>		

CoA	Is the Project compliant with this CoA?	Evidence/Comments
<p>28. To minimise visual and lighting impacts to Siding Spring Observatory, the approval holder must comply with condition B65 (a-d) of the NSW approval</p>	<p>Compliant</p>	<p>Santos considers lighting as part of the design process for development of the Project.</p> <p>As part of the FDP, the location of project related infrastructure to sensitive receivers and amenity was considered through the implementation of a 200m buffer. Reasonable and feasible measures will be further considered through development of the Project.</p> <p>Santos undertakes a completions and drilling assurance program for each campaign that includes a light survey. The survey details measured light levels and placement against a rig and site lighting schematic. All reasonable and feasible measures are implemented to minimise the visual and lighting impacts of the Project, including consideration of:</p> <ul style="list-style-type: none"> • Australian Standard 4282-1997 Control of obtrusive effects of outdoor lighting; • Australian Standard 1158-2010 Lighting for roads and public spaces for roadways and plant; and • good lighting design principles defined in the Dark Sky Planning Guideline. <p>No fixed outdoor lights shine directly above the horizontal or above the building line or any illuminated structure.</p> <p>To screen views to the Project from residences and road users, Santos will implement tree screening along the Newell Highway in the vicinity of the Project (including the Leewood facility), prior to the commencement of Phase 2, as required by condition B66 of the NSW approval.</p> <p>The Sliding Spring Observatory did not request monitoring of light levels during the reporting period.</p> <p>Santos acknowledges that all scheduled flaring must be undertaken in accordance with condition B65(b)(ii) of the NSW Approval.</p>
<p><u>Part B – Standard administrative conditions</u></p>		
<p>Notification of date of commencement of the action</p>		

CoA	Is the Project compliant with this CoA?	Evidence/Comments
<p>29. The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.</p>	<p>Compliant</p>	<p>Compliance is evidenced in the commencement letters dated:</p> <ul style="list-style-type: none"> • 8 February 2023; and • 21 February 2023. <p>The Department acknowledged the commencement notification in correspondence dated 21 March 2023.</p> <p>A copy of the correspondence is provided in Appendix B.</p>
<p>30. If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister.</p>	<p>Not applicable</p>	<p>CoA 30 was not triggered during the reporting period as the commencement of the Project occurred on 7 February 2023 (i.e. within 5 years from the date of EPBC 2014/7376 approval).</p>
<p>Compliance records</p>		
<p>31. The approval holder must maintain accurate and complete compliance records.</p>	<p>Compliant</p>	<p>Santos maintains accurate and complete compliance records. The compliance records will be made available to the Department upon request.</p>
<p>32. If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.</p>	<p>Not applicable</p>	<p>CoA 30 was not triggered as no written requests from the Department were received during the reporting period.</p>
<p>Annual compliance reporting</p>		

CoA	Is the Project compliant with this CoA?	Evidence/Comments
<p>33. The approval holder must prepare a compliance report every calendar year from commencement of the action. The approval holder must:</p> <ul style="list-style-type: none"> a. publish each compliance report on the website within 60 business days following the relevant 12 month period; b. notify the Department by email that a compliance report has been published on the website and provide the weblink for the compliance report within 5 business days of the date of publication; c. keep all compliance reports publicly available on the website until this approval expires; d. exclude or redact sensitive ecological data from compliance reports published on the website; and e. where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication. 	<p>Compliant</p>	<p>This Compliance Report is evidence of compliance with CoA 33. In accordance with CoA 33(a) and CoA 33(b), Santos will notify the Department that the Compliance Report has been published within 5 business days of the date of publication.</p>

CoA	Is the Project compliant with this CoA?	Evidence/Comments
<p>34. The compliance report must also include a dedicated section on groundwater that includes, but is not limited to, the following information:</p> <ul style="list-style-type: none"> a. all relevant interpreted and analysed groundwater monitoring data (including level, pressure and water quality). b. evidence that groundwater performance criteria in the NSW-approved GMP have been achieved. c. how the management measures committed to in the approved WMP have been effective in achieving performance measures and the outcomes for groundwater resources specified in Appendix B. d. if condition 9 is triggered, a description of any mitigation and management measures implemented to achieve the outcomes specified in Appendix B, and monitoring data showing the effectiveness of those measures. e. a report of all recommendations made by each Water Technical Advisory Group meeting. This must include a statement of how these recommendations have been implemented and where they have not, a statement as to why not. f. evidence that all points in condition B39 (f) (vi) of the NSW approval are not exceeded. 	<p>Compliant</p>	<p>The elements of CoA 34 are addressed in section 2.2.</p>
<p>Reporting non-compliance</p>		

CoA	Is the Project compliant with this CoA?	Evidence/Comments
<p>35. The approval holder must notify the Department in writing of any incident within 2 business days, or any non-compliance with the conditions of this approval within 10 business days. The notification must specify:</p> <ul style="list-style-type: none"> a. any condition which is or may be in breach, including a reference to the relevant NSW condition (if required); b. a short description of the incident and/or non-compliance; and c. the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available. 	<p>Compliant</p>	<p>The Department was notified via email on 18 March 2024 of the non-compliance with CoA 4. The notification addressed the requirements of CoA 35.</p>
<p>36. The approval holder must provide to the Department the details of any incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying:</p> <ul style="list-style-type: none"> a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future; b. the potential impacts of the incident or non-compliance; and c. the method and timing of any remedial action that will be undertaken by the approval holder. 	<p>Not Applicable</p>	<p>CoA 36 was not triggered during the reporting period. The non-compliance with CoA 4 did not relate to conditions or commitments made in plans.</p>
<p>Submission and publication of plans</p>		

CoA	Is the Project compliant with this CoA?	Evidence/Comments
<p>37. The approval holder must:</p> <ul style="list-style-type: none"> a. submit plans electronically to the Department; b. unless otherwise agreed to in writing by the Minister, publish each plan on the website within 20 business days of the date: <ul style="list-style-type: none"> i. of this approval, if the version of the plan to be implemented is specified in these conditions; or ii. that the plan is submitted to the Minister or the Department if the plan does not require the approval of the Minister but was not finalised before the date of this approval; or iii. that the plan was approved by the Minister in writing, if the plan requires the approval of the Minister; c. exclude or redact sensitive ecological data from plans that are to be published on the website or provided to a member of the public; and d. keep plans published on the website for the period for which this approval has effect. 	<p>Compliant</p>	<p>Compliance with the submission of Management Plans to the Department is evidenced in the email correspondence titled 'Narrabri Gas Project, NSW EPBC 2014/7376 - Management Plan submissions' dated 21 November 2022. Santos also publish the approved Management Plans on the Project's website, which can be accessed via: https://narrabrigasproject.com.au/about/environment/ Santos exclude all sensitive ecological data from published plans and will keep plans published on the website for the period of the Approval. The revised FPD was published on the NGP website on 30 November 2023.</p>
<p>Independent audit</p>		
<p>38. The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister.</p>	<p>Not applicable</p>	<p>A request to conduct an independent audit of compliance with the CoA was not required by the Minister during the reporting period.</p>

CoA	Is the Project compliant with this CoA?	Evidence/Comments
<p>39. For each independent audit, the approval holder must:</p> <ul style="list-style-type: none"> a. provide the name and qualifications of the independent auditor and the draft audit criteria to the Department; b. only commence the independent audit once the audit criteria have been approved in writing by the Department; and c. submit an audit report to the Department within the timeframe specified in the approved audit criteria. 	<p>Not applicable</p>	<p>An independent audit of compliance with the CoA was not required during the reporting period, as such CoA 39 was not triggered.</p>
<p>40. The approval holder must publish the audit report on the website within 10 business days of receiving the Department’s approval of the audit report and keep the audit report published on the website until the end date of this approval.</p>	<p>Not applicable</p>	<p>An independent audit of compliance with the CoA was not required during the reporting period, as such CoA 40 was not triggered.</p>
<p>Completion of the action</p>		
<p>41. Within 30 business days after whichever is the earlier of:</p> <ul style="list-style-type: none"> a. the completion of the action, or b. 60 business days before the end date of the period for which this approval has effect; <p>the approval holder must notify the Department in writing and provide completion data.</p> <p>If completion of the action is unlikely to occur before the end date of the period for which the approval has effect, the approval holder must submit to the Department, before the end date of the period for which the approval has effect, a request, in accordance with the requirements of section 145C of the EPBC Act, to extend the period of effect of the approval.</p>	<p>Not applicable</p>	<p>The project commenced on 7 February 2023. The project has an estimated operating period of approximately 20 years. As such, CoA 41 was not triggered during the reporting period.</p>

Appendix B – Supporting evidence for CoA 3 and 29

Appendix C – Supporting evidence for CoA 19 and 20

Appendix D – Supporting evidence for CoA 22