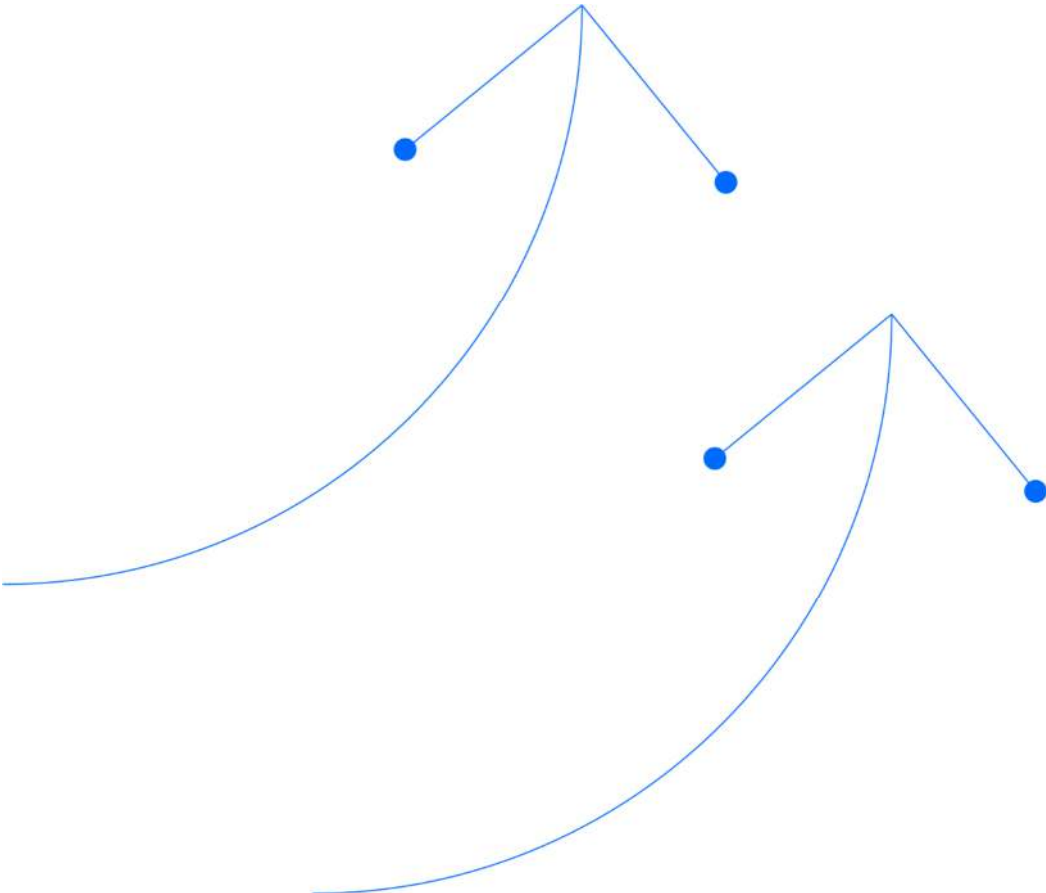


NARRABRI GAS PROJECT EPBC 2014/7376 COMPLIANCE REPORT 2025

March 2026



Project name		Narrabri Gas Project					
Document title		Narrabri Gas Project EPBC 2014/7376 Compliance Report 2025					
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Key terms, abbreviations and acronyms

Acronym	Description
BMP	<i>Biodiversity Management Plan, Rev0C, 29 May 2024</i>
CoA	Condition of Approval EPBC 2014/7376
CoC	Conditions of Consent for SSD 6456
Compliance Report	This EPBC Compliance Report, prepared for the 2025 Reporting Period
CRAF	Chemical Risk Assessment Framework
CSG	Coal Seam Gas
Cth	Commonwealth
D&C	Drilling and Completions
DCCEEW	Commonwealth Department of Climate Change, Energy, the Environment and Water
DPE	Former NSW Department of Planning and Environment (now DPHI)
DPHI	NSW Department of Planning, Infrastructure and Environment
EMS	<i>Environmental Management Strategy, Rev0B, 24 January 2024</i>
EPBC Act	<i>Environmental Protection and Biodiversity Conservation Act (1999) (Cth)</i>
EPL	Environment Protection Licence
FDP	<i>Field Development Protocol, Rev0C, 18 November 2022</i>
FD Plan	<i>Field Development Plan, Rev0B, 25 September 2023</i>
GDE	Groundwater Dependent Ecosystem
GMP	<i>Groundwater Management Plan, Rev0C, 11 November 2022</i>
GMonP	<i>Groundwater Monitoring Plan, Rev0E, 11 November 2022</i>
ha	hectares
IEA	Independent Environmental Audit
km	kilometre
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
PAL	Petroleum Assessment Lease
PEL	Petroleum Exploration Licence
produced water	water generated from the coal seams in order to extract natural gas
Santos	Santos NSW (Eastern) Pty Ltd
SSD	State significant development
TARP	Trigger Action Response Plan
the Action	The Narrabri Gas Project
the Approval	EPBC 2014/7376

Acronym	Description
the Guidelines	Annual Compliance Report Guidelines
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
the Reporting Period	The period 1 January 2025 – 31 December 2025
Waste MP	<i>Waste Management Plan</i> , Rev0E, 24 January 2024
WMP	<i>Water Management Plan</i> , Rev0E, 24 January 2024
WTAG	Water Technical Advisory Group

1. Introduction

On 24 November 2020, Santos NSW (Eastern) Pty 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 kilometre (**km**) southwest of Narrabri, NSW under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (**EPBC Act**) (2014/7376).

This Compliance Report has been prepared to address the EPBC 2014/7376 approval (**the Approval**), Conditions of the Approval (**CoA**) 33 and 34 for the project. As directed by the definitions of the Approval, the Compliance Report has been prepared in accordance with the *Annual Compliance Report Guidelines* (Department of the Environment, 2014) (**the Guidelines**). The Compliance Report has been prepared for the period 1 January 2025 to 31 December 2025 (**the Reporting Period**).

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

1.1. Description of activities

On 30 September 2020, Santos obtained consent for State significant development (**SSD**) 6456 to develop the project.

The project includes the progressive installation 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 (**km**) (95,000 hectares [**ha**]) in size and the project footprint will only directly impact approximately 1% of that area. The general layout of the project is shown in Appendix 2 of the SSD 6456 Conditions of Consent (**CoC**) and reproduced in Figure 1.1.

In accordance with CoC A5, the project is staged 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
- Phase 4, comprising gas well and infrastructure decommissioning, rehabilitation and mine closure.

The project is currently in Phase 1. Phase 1 is defined in SSD 6456 as the phase of the development comprising ongoing exploration and appraisal activities in the project area, 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)
- 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.

Santos plans to continue exploration and appraisal including continued operation of Santos' existing wells, infrastructure and facilities in Petroleum Exploration Licence (**PEL**) 238 and Petroleum Assessment Lease (**PAL**) 2, and construction and operation of new core holes, pilot wells and supporting infrastructure permitted under Phase 1.

In accordance with CoA 3, Santos must notify DCCEEW 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 DCCEEW was notified of the commencement on 8 February 2023.

In accordance with CoA 3, Santos must also notify DCCEEW in writing of the date of completion of each Phase within two business days of the date of completion of that Phase. Phase 2 of the project did not commence during the Reporting Period.

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) 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:

27 March 2026

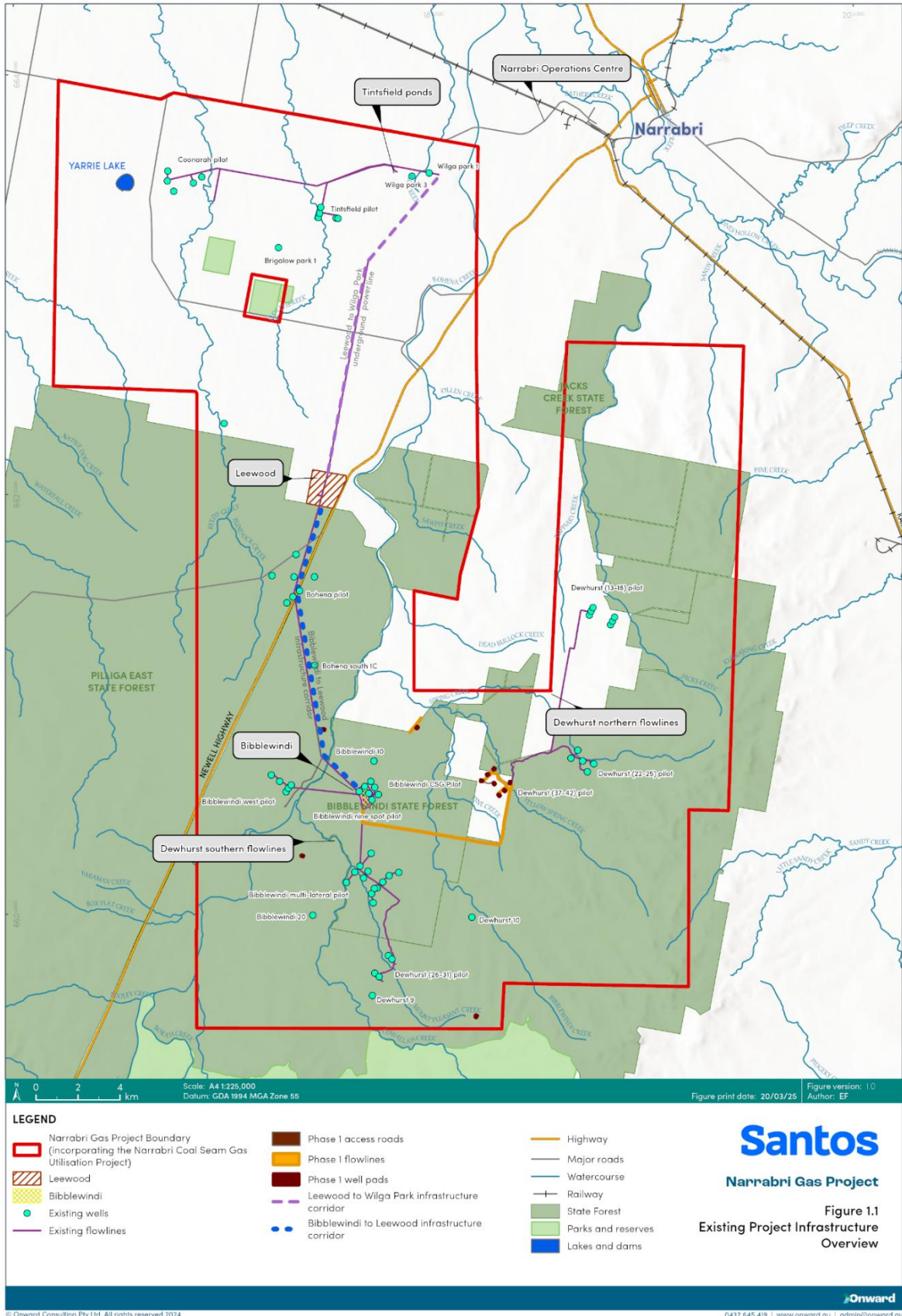


Figure 1.1 Existing project infrastructure

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 within this Compliance Report.

Table 1.1 Relevant obligations in CoA 33 and 34

Relevant obligation		Comment
CoA 33	The approval holder must prepare a compliance report every calendar year from commencement of the Action. The approval holder must:	Phase 1 of the project commenced on 7 February 2023. Santos has prepared Compliance Reports for the 2023 and 2024 reporting periods which are available on the Narrabri Gas Project website: https://narrabrigasproject.com.au/about/environment/
	a. publish each compliance report on the website within 60 business days following the relevant 12-month period	This Compliance Report has been prepared for the period from 1 January 2025 to 31 December 2025 (i.e. the Reporting 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	The previous Compliance Report was published on 26 March 2025 and DCCEEW was notified on 26 March 2025 within five business days as per CoA 33(b).
	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 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.	Regular reporting documentation for the project, including the Compliance Reports, can be accessed via the Narrabri Gas Project website: https://narrabrigasproject.com.au/about/environment/
CoA 34	The compliance report must also include a dedicated section on groundwater that includes, but is not limited to, the following information:	The reporting requirements of CoA 34 are discussed in Section 2.2, and the following subsections:
	a. all relevant interpreted and analysed groundwater monitoring data (including level, pressure and water quality).	<ul style="list-style-type: none"> Section 2.2.1 – Groundwater monitoring network. Section 2.2.4 – Groundwater monitoring data.
	b. evidence that groundwater performance criteria in the NSW-approved Groundwater Management Plan have been achieved.	Section 2.2.2 – Groundwater performance criteria.

Relevant obligation		Comment
	c. how the management measures committed to in the approved <i>Water Management Plan</i> , Rev0E, 24 January 2024 (WMP) have been effective in achieving performance measures and the outcomes for groundwater resources specified in Appendix B.	Section 2.2.5– Management measures.
	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.	Section 2.2.5– Management 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.	Section 2.2.6 – Recommendations – Water Technical Advisory Group (WTAG).
	f. evidence that all points in condition B39 (f) (vi) of the NSW Approval are not exceeded.	Section 2.2.7 – NSW Approval – condition B39(f)(vi).
	<i>Note: Compliance reports may be published on the Department's website</i>	

1.4. Key personnel

Key personnel responsible for operational and environmental management of the project during the Reporting Period are prescribed in the *Environmental Management Strategy*, Rev0B, 24 January 2024 (**EMS**) and as detailed 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. • Ensure the environmental performance of the project is consistent with the conditions of approval and the Santos Management System. • Responsible for legislative compliance, observation of contractual obligations and the maintenance of resources to achieve the main objectives of the Narrabri Gas Project 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 all employees and contractors are aware of the compliance requirements of the EMS. • Ensure adequate resources are available to advise on the implementation of the EMS and to undertake assurance of compliance in its implementation.
Drilling and Completion (D&C) Project Lead or D&C Manager	<ul style="list-style-type: none"> • Reports to the Manager Drilling and Completions CSG / NSW. • Responsible for the drilling and development of the well to operational handover.

Position	Responsibility
	<ul style="list-style-type: none"> Ensures the environmental performance of the project is consistent with the conditions of approval and the Santos Management System during drilling & completions activities. Responsible for legislative compliance, observation of contractual obligations and monitoring contractor risk controls and assurance activities to achieve the main objectives of the Narrabri Gas Project EMS.
Area Team Leader Narrabri	<ul style="list-style-type: none"> Reports to the Area Manager, Arcadia, Scotia and Narrabri. Maintains accountability, either directly or by delegation, for the overall management of the project site and the operation of project components. Retains responsibility for the conveyance of the Narrabri Gas Project EMS and its objectives to all employees and contractors entering site.
Team Leader Environment Eastern Queensland and NSW	<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 Narrabri Gas Project EMS. Advises operations, development and drilling & completions management on environmental issues. Reviews contractor HSE and Environmental Management Plan documentation (where applicable). Oversees the implementation of all management plans, protocols and strategies required under the CoC. Consults with regulatory authorities as required. Ensures required monitoring is undertaken, in cooperation with the Environmental Advisor. Ensures required maintenance is undertaken, in cooperation with the Area Manager. Provides measures for continual improvement to the plans and procedures. Ensures 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 this EMS. Responds to community complaints.
Senior Advisor Land Resources, Regional	<ul style="list-style-type: none"> Reviews soil moisture conditions and arranges irrigation to be undertaken on basis of those reviews. 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 Environment Eastern Queensland and NSW. Maintains accountability for the monitoring of compliance with the EMS.

Position	Responsibility
	<ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> – water – noise – biodiversity – rehabilitation – heritage – waste.
Construction Supervisor, Development Execution Construction	<ul style="list-style-type: none"> • Reports to the Team Leader Construction, Development Execution Construction • Responsible for ensuring implementation of the EMS, including all approved plans and protocols, during the construction phase. • Communicates the EMS compliance during construction phase.
Drilling and Completions 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 drilling & completions phase. • Communicates environmental compliance during the drilling & completions phase.
Operator Maintainer, Operations	<ul style="list-style-type: none"> • Reports to the Area Team Leader Narrabri. • Maintains accountability for the monitoring of compliance with the environmental obligations during the life of the operation. • Undertakes site inspections.
Santos personnel and contractors	<ul style="list-style-type: none"> • Perform tasks in an environmental responsible manner. • Notify the Environmental Advisor of any environmental incidents and exceedances • Undertake all activities in accordance with the EMS. • 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 CoA, including supporting evidence, is provided in Appendix A.

No non-compliances occurred during the Reporting Period.

2.2. Compliance with CoA 34 – Groundwater

This section addresses all obligations within CoA 34. The obligations within CoA 34 and where these obligations are addressed within this Compliance 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 0 – 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 <i>Groundwater Management Plan</i> , Rev0C, 11 November 2022 (<i>GMP</i>) have been achieved.	Section 2.2.4 – 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 WMP have been effective in achieving performance measures and the outcomes for groundwater resources specified in Appendix B.	Section 2.2.5 – 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 (WTAG) 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 2.2.6 – Recommendations – WTAG - 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 2.2.7– NSW Approval – Condition B39(f)(vi) - Provides a summary of the compliance with the condition.

2.2.1. Groundwater monitoring network

The project remained in Phase 1 for the duration of the Reporting Period. Phase 1 involves exploration and appraisal activities, including establishing a monitoring network of active groundwater monitoring bores to enable monitoring of the performance criteria and Level 2 and 3 triggers as outlined in the Trigger Action Response Plan (**TARP**) included in the GMP.

No new groundwater monitoring points were installed during the Reporting Period. Groundwater level monitoring continued during the Reporting Period including all level 2 triggers as depicted in Table 2.2. Groundwater quality monitoring continued during the Reporting Period at the locations listed in

Table 2.3.

A groundwater core hole was drilled in early 2025 at Dewhurst 35 to obtain data from formations that overlay the target coal seams. The data collection is a part of the Stage 3 (Data collection) commitment in the *Groundwater Modelling Plan, Rev0E, 11 November 2022 (GModP)* to validate and improve the confidence level of the groundwater model. Santos is continuing to progress Stage 3 (Data collection) and Stage 4 (Data interpretation) of the GModP.

Table 2.2 Phase 1 active groundwater monitoring bores (Level 2)

Monitoring point name	Monitored formation
TULPRDGY02	Digby Formation
BHNS1PRDGY02	Digby Formation
BWD6PRDGY02	Digby Formation
DWH9PRDGY02	Digby Formation
DWH43PRDGY02	Digby Formation
GW971623-1	Digby Formation
DWH35PRDGY02	Digby Formation
GW099044	Digby Formation

Table 2.3 Phase 1 active groundwater quality bores (Level 3)

Monitoring point name	Monitored formation
BHN14PRUPS02	Upper Piliga Sandstone
BWD26PRUPS01	Upper Piliga Sandstone
BWD26PRLPS02	Lower Piliga Sandstone
BWD27PRUPS02	Upper Piliga Sandstone
BWD27PRLPS03	Lower Piliga Sandstone
DWH3PRUPS01	Upper Piliga Sandstone
DWH3PRLPS02	Lower Piliga Sandstone
DWH14PRUPS01	Upper Piliga Sandstone
DWH14PRLPS02	Lower Piliga Sandstone
BHNS1PRLPS01	Lower Pilliga Sandstone
BWD6PRLPS01	Lower Pilliga Sandstone
DWH9PRLPS01	Lower Pilliga Sandstone
DWH43PRLPS01	Lower Pilliga Sandstone
DWH35PRLPS01	Lower Pilliga Sandstone

2.2.2. 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 for 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 produced water are considered reliable.

The GMP establishes that groundwater monitoring (including trigger monitoring) must be in place prior to extraction of produced water as modelled for Phase 1. This allows time for the new monitoring points to be installed. 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 pilot wells which is reflected in Section 3.3 of the *Groundwater Monitoring Plan, Rev0E, 11 November 2022 (GMonP)*. No new Phase 1 pilot wells were drilled during the Reporting Period.

Santos is undertaking groundwater monitoring to verify the model predictions are accurate and reliable. During the Reporting Period, the groundwater trigger levels in the GMP were not applicable as no Phase 1 pilot wells were drilled. The outcomes and sub-outcomes specified in Appendix B of the Approval are consistent with the groundwater triggers outlined in the GMP.

2.2.3. Monitoring of deeper hydrostratigraphic units

Santos is reviewing the GMP in consultation with the WTAG and the NSW Department of Planning, Housing and Infrastructure (DPHI), including clarification of monitoring bores relevant to the Napperby Sandstone.

Monitoring within the Digby Formation is considered to be more conservative insofar that it is located 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.

2.2.4. Groundwater monitoring data

No new Phase 1 pilot wells were drilled during the Reporting Period and, as such, no water extraction from new Phase 1 pilot wells occurred during the Reporting Period. Therefore, assessment of monitoring data has not yet commenced, and the groundwater trigger levels were not applicable during the Reporting Period.

Santos publish quarterly EPBC groundwater monitoring data reports on the Resources Library website (<https://waterportal.santos.com/>). Reporting in line with CoA 7(c) is in place following the amendment to Environment Protection Licence 20350 on 17 February 2025.

The monitoring data demonstrated the following:

- Groundwater levels within the Digby Formation remained relatively stable during the Reporting Period.
- Groundwater quality remained stable during the Reporting Period.

2.2.5. Management measures

During the Reporting Period, Santos continued to implement 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 new Phase 1 pilot wells were drilled.

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.

2.2.6. Recommendations – Water Technical Advisory Group

The WTAG held two meetings during the Reporting Period on 29 April 2025 and 10 December 2025.

A summary of their recommendations and how they have been implemented is provided in Table 2.4.

Table 2.4 Water Technical Advisory Group recommendations and implementation

Meeting	WTAG Recommendations	Implementation
29 April 2025	No recommendations	Not applicable
10 December 2025	No recommendations	Not applicable

Santos is reviewing the GMP to address the recommendations issued in the 2023 Independent Environment Audit (IEA) Hydrogeological Audit report and SSD 6456 2023 Annual Review including:

- Clarification on the timing of the remaining groundwater monitoring bore network installation.
- Clarification on the timing of the groundwater monitoring obligation (CoA 7).
- Clarification that the timing for the commencement of full monitoring obligations will be prior to water production from the Phase 2 gas wells.

2.2.7. SSD 6456 Condition of Consent B39(f)(vi)

CoC B39(f)(vi) requires the groundwater model for the project 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 (2012).
- Groundwater management response triggers in the GMP.

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 new Phase 1 pilot wells were drilled.

In accordance with CoC 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 CoC B39(f)(iv) and will report the findings in the relevant Compliance Report.

2.3. Non-compliances

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

No non-compliances occurred during the Reporting Period.

2.4. Amendments to plans

Revision to the Phase 1 Rehabilitation Management Plan was approved by DPHI on 4 February 2025. The revision included updates to account for the change to the location of the Dewhurst 34 well pad and access track. Updates to other management plans regarding this change were completed in 2024.

2.5. New environmental risks

No new environmental risks were identified during the Reporting Period.

3. Conclusions

This Compliance Report was prepared in March 2026, and covers activities completed during the Reporting Period. A review of compliance with the CoA was completed. A summary of compliance is outlined in Appendix A.

No non-compliances were identified during the Reporting Period.

4. References

Department of the Environment (2014). *Annual Compliance Report Guidelines*. NSW Department of the Environment

Department of Climate Change, Energy, the Environment and Water (2023). *Annual Compliance Report Guidelines*. NSW Department of Climate Change, Energy, the Environment and Water

Department of Primary Industries (2012). *NSW Aquifer Interference Policy*. NSW Department of Primary Industries

Office of Environment and Heritage (2014). *NSW Biodiversity Offsets Policy for Major Projects*. NSW Office of Environment and Heritage

Standards Australia (2019). *Australian Standard/New Zealand Standard International Standards Organisation 4282:2019 - Control of the obtrusive effects of outdoor lighting*

Standards Australia (2010). *Australian Standard/New Zealand Standard International Standards Organisation 1158:2010 - Lighting for roads and public spaces for roadways and plant*

Department of Planning and Environment. *Dark Sky Planning Guideline*. NSW Department of Planning and Environment

Appendix A - Summary of compliance

CoA	Is the project compliant with this CoA?	Evidence/comments
Part A – Conditions Specific to the action		
1. The approval holder must undertake the Action as described in and in accordance with the NSW Approval.	Compliant	The SSD 6456 2025 Annual Review provides a summary of the environmental performance during the period 1 January 2025 to 31 December 2025. No non-compliances occurred during the Reporting Period. The SSD 6456 2025 Annual Review will be available on the Narrabri Gas Project website following acceptance of the report by DPHI.
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.	Compliant	No new disturbance was undertaken during the Reporting Period. Surface disturbance of native vegetation that has occurred during Phase 1 is about 2.92 ha as at 31 December 2025. No vegetation was cleared outside the project area, as evidenced in the SSD 6456 Annual Review.
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.	Compliant	A new Phase of the NGP did not commence within the Reporting Period. The NGP is still within Phase 1 and, as such, a notification to DCCEEW was not required.

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, Rev0C, 18 November 2022 (FDP) required by condition B2 of the NSW Approval and the Field Development Plan, Rev0B, 25 September 2023 (FD 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. 	Compliant	The FDP or FD Plan were not amended during the Reporting Period.
<p><u>Water Resources</u></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. 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>	Compliant	During the Reporting Period, Santos complied with CoC 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 (SSD 6456). This is evidenced in the SSD 6456 2025 Annual Review, which can be accessed via the Narrabri Gas Project website when the report is accepted by DPHI.

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>The WMP was not updated during the Reporting Period.</p>
<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). In addition to the monitoring requirements specified in the approved GMP required under condition B41 of the NSW Approval, the approval holder must:</p> <p>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</p>	<p>Compliant</p>	<p>During the Reporting Period 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). • In accordance with CoA 7(c), groundwater monitoring data is published on the Santos website. This can be accessed via: https://waterportal.santos.com/resources-library/. • Santos is reviewing the GMP to address the recommendations issued in the 2023 IEA Hydrogeological Audit report and the SSD 6456 2023 Annual Review as outlined in Section 2.2.6.

CoA	Is the project compliant with this CoA?	Evidence/comments
<ul style="list-style-type: none"> 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>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>	Not applicable	CoA 8 was not triggered during the Reporting Period as Santos did not exceed any of the groundwater performance criteria specified in the GMP, as noted in Section 2.2. The groundwater model was not updated during the Reporting Period.
<p>9. The approval holder must, within 6 months of detecting or predicting an exceedance as</p>	Not applicable	CoA 9 was not triggered during the Reporting Period as an exceedance, as described in CoA 8, did not occur.

CoA	Is the project compliant with this CoA?	Evidence/comments
<p>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>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>

CoA	Is the project compliant with this CoA?	Evidence/comments
<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>
<p>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.</p>	<p>Not applicable</p>	<p>CoA 12 was not triggered during the Reporting Period as CoA 11 was not triggered.</p>

CoA	Is the project compliant with this CoA?	Evidence/comments
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.
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.	Not applicable	Santos was not required to cease groundwater extraction pursuant to CoA 15 during the Reporting Period. As such, CoA 17 was not triggered.

CoA	Is the project compliant with this CoA?	Evidence/comments
<u>Chemicals management</u>		
<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>	Compliant	<p>During the Reporting Period, potential waste impacts associated with the project were managed in accordance with CoC B67-B71. Santos complied with CoC B67-71 as evidence below:</p> <ul style="list-style-type: none"> • Requirements under CoC B67 are outlined within the approved <i>Waste Management Plan, Rev0E, 24 January 2024 (Waste MP)</i>. • 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 2025 Annual Review, which will be available on the Narrabri Gas Project website once the report is accepted by DPHI. In accordance with CoC B68, Santos did not receive waste in the project area for storage, treatment, processing, reprocessing or disposal. • In accordance with CoC 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 the former NSW Department of Planning and Environment (DPE) on 11 November 2022. • In accordance with CoC 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>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> <p>a. Details of how these risks will be assessed consistent with best practice risk</p>	Compliant	<p>Compliance is evidenced in the development of the CRAF and approval letter from DCCEEW dated 8 August 2022.</p> <p>The project commenced on 7 February 2023 which is after the approval of the CRAF.</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> <p>An update of the CRAF was not required within the Reporting Period.</p>

CoA	Is the project compliant with this CoA?	Evidence/comments
<p>assessment methodologies, and how assessment will address:</p> <ul 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. <p>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:</p> <ul style="list-style-type: none"> i. combined persistence, bioaccumulative and toxicity assessment 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> <p>c. Detail a risk assessment process for each chemical to determine risk to protected matters from the chemical's use. This process must:</p> <ul style="list-style-type: none"> i. ii. identify the risk assessment requirements based on the chemical's category 		

CoA	Is the project compliant with this CoA?	Evidence/comments
<ul style="list-style-type: none"> iii. 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 iv. consider the likely environmental fate of the chemical and v. 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 expert, to demonstrate that risks have been adequately assessed; and 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 		

CoA	Is the project compliant with this CoA?	Evidence/comments
<p>demonstrate no adverse impacts to protected matters, including processes to notify the Department if an adverse impact to protected matters is detected.</p> <p>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>		
<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>	Compliant	<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.</p> <p>See Appendix C for a copy of the approval letter.</p> <p>The CRAF documentation can be accessed via: https://www.santos.com/about-us/corporate-governance/public-notice/</p> <p>An update of the CRAF was not required within the Reporting Period.</p>
<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>	Compliant	<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 DCCEE in email correspondence “EPBC 2014-7376 – notification of low-risk chemicals” dated 14 September 2022, 19 September 2022, and 25 November 2022.</p> <p>An update of the CRAF was not required within the Reporting Period.</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>	Compliant	<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.

CoA	Is the project compliant with this CoA?	Evidence/comments
		<ul style="list-style-type: none"> 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>An update of the CRAF was not required within the Reporting Period.</p> <p>The Register of Assessed Chemicals documentation can be accessed via: https://www.santos.com/about-us/corporate-governance/public-notice/</p> <p>See Appendix D for copies of the approval letters.</p>
<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> <ol style="list-style-type: none"> an assessment of whether all risk assessments on the register are consistent with current scientific knowledge an evaluation of the adequacy of relevant monitoring, mitigation and management measures that have been implemented by the approval holder and 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.</p> <p>The peer review of the CRAF is due within 5 years of this date, being prior to 1 April 2027.</p> <p>Santos will engage a chemical risk assessment expert to conduct a review of all the risk 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 1 April 2027.</p> <p>Santos will submit the outcomes of the risk assessment review to DCCEE within 60 business days following the review.</p>

CoA	Is the project compliant with this CoA?	Evidence/comments
<u>Threatened species and communities</u>		
<p>25. The approval holder must comply with conditions B43 - B52 of the NSW Approval as they relate to the following protected matters:</p> <ol style="list-style-type: none"> Brigalow woodland Weeping Myall woodland Regent Honeyeater Koala Spotted-tail Quoll Swift Parrot Superb Parrot South-eastern Long-eared Bat Pilliga Mouse <i>Bertya opposens</i> <i>Lepidium aschersonii</i> <i>Lepidium monoplocoides</i> <i>Androcalva procumbens</i> and <i>Tylophora linearis</i>. 	Compliant	<p>During the Reporting Period, Santos complied with CoC B43-B52 of SSD 6456 (where triggered) as evidenced below:</p> <ul style="list-style-type: none"> CoC B45 and B46 of SSD 6456 were not triggered during the Reporting Period as Phase 2 of the project has not commenced. In accordance with CoC B47 of SSD 6456, 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. CoC B48 and B49 of SSD 6456 were not triggered during the Reporting Period as the project is in Phase 1. In accordance with CoC B50 of SSD 6456, Santos established a Biodiversity Advisory Group prior to the commencement of Phase 1. The Biodiversity Advisory Group met on 29 April 2025 and 9 December 2025 during the Reporting Period. In accordance with CoC B51 and B52 of SSD 6456, Santos prepared a Biodiversity Management Plan, Rev0B, 11 November 2022 (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. No additional vegetation disturbance occurred during the Reporting Period, as such no threatened flora or fauna habitat were impacted by the project, with no significant differences in biodiversity values observed as part of biodiversity monitoring conducted from 2 to 28 September 2025. Two biodiversity TARPs were triggered during the Reporting Period, which were caused by: <ul style="list-style-type: none"> a decrease of 10 or greater in VI scores at one individual impact site in absence of similar decline at paired control site likely attributed to inter-seasonal variability in ground cover and leaf litter composition and structure a total of six pest flora species identified at ten monitoring sites that had not been identified on location previously.

CoA	Is the project compliant with this CoA?	Evidence/comments
		<ul style="list-style-type: none"> This is evidenced within the SSD 6456 2025 Annual Review, which will be available on the Narrabri Gas Project website once the report is accepted by DPHI.
<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>	Not applicable	CoA 26 was not triggered during the Reporting Period as Phase 2 of the project has not commenced.
<p>27. Prior to the commencement of Phase 3, the approval holder must provide the Department with:</p> <ol style="list-style-type: none"> 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 shapefiles of the actual clearance areas for each of the protected matters and 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. 	Not applicable	CoA 27 was not triggered during the Reporting Period as Phase 3 of the project has not commenced.
<p><u>Commonwealth land</u></p>		
<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>	Compliant	<p>Santos considers lighting as part of the design process for development of the project.</p> <p>As part of the FD Plan, 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>

CoA	Is the project compliant with this CoA?	Evidence/comments
		<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 • good lighting design principles defined in the <i>Dark Sky Planning Guideline</i>. <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 CoC B66 of SSD 6456.</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 CoC B65(b)(ii) of SSD 6456.</p>
Part B – Standard administrative conditions		
<u>Notification of date of commencement of the Action</u>		
<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>	Compliant	<p>Compliance is evidenced in the commencement letters dated:</p> <ul style="list-style-type: none"> • 8 February 2023 • 21 February 2023. <p>DCCEEW 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</p>	Not applicable	<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>

CoA	Is the project compliant with this CoA?	Evidence/comments
commence the Action without the prior written agreement of the Minister.		
<u>Compliance records</u>		
31. The approval holder must maintain accurate and complete compliance records.	Compliant	Santos maintains accurate and complete compliance records. The compliance records will be made available to DCCEEW upon request.
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.	Not applicable	CoA 30 was not triggered as no written requests from DCCEEW were received during the Reporting Period.
<u>Annual compliance reporting</u>		
<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 	Compliant	<p>This Compliance Report is evidence of compliance with CoA 33. In accordance with CoA 33(a) and CoA 33(b), Santos will notify DCCEEW 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
Department within 5 business days of publication.		
<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 	Compliant	The elements of CoA 34 are addressed in Section 2.2.

CoA	Is the project compliant with this CoA?	Evidence/comments
<u>Reporting non-compliance</u>		
<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. 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 	Compliant	No incidents or non-compliances were identified during the Reporting Period.
<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. 	Not Applicable	No incidents or non-compliances were identified during the Reporting Period.

CoA	Is the project compliant with this CoA?	Evidence/comments
<u>Submission and publication of plans</u>		
<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. 	Compliant	<p>Compliance with the submission of Management Plans to the DCCEEW 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 Narrabri Gas Project homepage.</p> <p>Santos exclude all sensitive ecological data from published plans and will keep plans published on the Narrabri Gas Project homepage for the period of the Approval.</p> <p>The Pollution Incident Response Management Plan and Dam Safety Emergency Plan were revised to address changes made to the Onshore Emergency Response Plan. DCCEEW approved this revision on 11 April 2025.</p>
<u>Independent audit</u>		
<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>	Not applicable	<p>A request to conduct an independent audit of compliance with the CoA was not required by the Minister during the Reporting Period.</p>
<p>39. For each independent audit, the approval holder must:</p>	Not applicable	<p>An independent audit of compliance with the CoA was not required during the Reporting Period, as such CoA 39 was not triggered.</p>

CoA	Is the project compliant with this CoA?	Evidence/comments
<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>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>	Not applicable	An independent audit of compliance with the CoA was not required during the Reporting Period, as such CoA 40 was not triggered.
<p><u>Completion of the Action</u></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 c. the approval holder must notify the Department in writing and provide completion data. <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>	Not applicable	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.

Appendix B - Supporting evidence for CoA 3 and 29



Australian Government
**Department of Climate Change, Energy,
the Environment and Water**

Ref: EPBC 2014/7376

Email: EPBCmonitoring@dcceew.gov.au

[REDACTED]
Development Manager NSW/NT
Santos Ltd
60 Flinders Street
ADELAIDE SA 5000

Dear [REDACTED]

**Commencement of the Action – The Narrabri Gas Project, Gunnedah Basin, NSW,
EPBC 2014/7376**

I refer to your letter on 21 February 2023 on behalf of Santos NSW (Eastern) Pty Ltd notifying the Department of Climate Change, Energy, the Environment and Water (the department) of commencement of the action for The Narrabri Gas Project, Gunnedah Basin, NSW in accordance with condition 29 of the *Environment Protection and Biodiversity Conservation Act 1999* (the Act) EPBC 2014/7376 approval.

I note that the action commenced on 07 February 2023.

Condition 33 – Annual Compliance Reporting

Condition 33 of the approval requires the approval holder to prepare an Annual Compliance Report for every calendar year from the of commencement of the action. The approval holder must continue to publish each report and notify the department of publication until the expiry of the approval on **31 December 2045**. The reports must be published within 60 business days of every 12 month anniversary of commencement. Documentary evidence of publication must be provided to the department within 5 business days the report is published.

Please notify the department of publication of the reports by email, including the link to where the report is publicly available, to EPBCmonitoring@dcceew.gov.au. Please note the first Annual Compliance Report is due to the department by **6 May 2024**.

When preparing the report please refer to the department's Annual Compliance Report Guidelines available on the department's website at <http://www.environment.gov.au/epbc/publications/annual-compliance-report-guidelines>


Please note that the conditions of approval require the approval holder to maintain accurate records of all activities associated with, or relevant to, the approval conditions so that they can be made available to the department on request. These documents may be subject to audit and be used to verify compliance. Summaries of audits may be published by the department.

More information about the department's Monitoring and Audit program is available on the department's website at <http://www.environment.gov.au/epbc/compliance-and-enforcement/auditing>.

Section 142 of the Act requires an approval holder to comply with conditions attached to an approval. Penalties may apply to approval holders who contravene conditions.

If you would like to discuss this matter further, please contact Hannah Brugman at EPBCmonitoring@dcceew.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Th', is written over the closing 'Yours sincerely,'.

Thomas Long
Assistant Director
Environmental Audit Section

21 March 2023

Appendix C - Supporting evidence for CoA 19 and 20



██████████
Senior Environmental Advisor
Onshore Oil & Gas
Santos Ltd
32 Turbot Street
BRISBANE QLD 4000

Dear ██████████

**Chemical Risk Assessment Framework, Narrabri Gas Project (EPBC 2014/7376)
Dated 1 April 2022**

Thank you for your correspondence on 6 April 2022 providing the Chemical Risk Assessment Framework (CRAF), dated 1 April 2022 in accordance with condition 19 of the above project under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Officers of the Department have advised me on the CRAF and the requirements of the conditions of the approval for this project. On this basis, and as a delegate of the Minister for the environment, I have decided to approve the CRAF. The CRAF must now be implemented.

Please note section 142 of the EPBC Act requires an approval holder to comply with conditions attached to an approval. Penalties may apply to approval holders who contravene conditions.

As you are aware, the Department has an active monitoring program which includes monitoring inspections, desk top document reviews and audits. Please ensure that you maintain accurate records of all activities associated with, or relevant to, the conditions of approval so that they can be made available to the Department on request.

Should you require any further information, please contact Derek Yates, Water Resources Regulatory Support at derek.yates@environment.gov.au or postapproval@environment.gov.au.

Yours sincerely

Kim Farrant
Assistant Secretary
Environment Assessments (Vic and Tas) and Post Approvals Branch
Environment Approvals Division

8 August 2022

DCCEEW.gov.au

John Gorton Building - King Edward Terrace, Parkes ACT 2600 Australia
GPO Box 3090 Canberra ACT 2601 ABN: 63 573 932 849

Appendix D - Supporting evidence for CoA 22



Ref: EPBC 2014/7376

[REDACTED]
Principal Environmental Adviser
Environment and Access
Santos Ltd
60 Flinders St
ADELAIDE SA 5000

**EPBC 2014/7376 – Narrabri Gas Project –
Approval to use Tetrahydro-3,5-dimethyl-1,3,5-thiadiazine-2-thione (Dazomet) /
Methyl isothiocyanate (MITC) and glutaraldehyde**

Dear [REDACTED]

Thank you for your correspondence of 5 September 2022 to the Department of Climate Change, Energy, the Environment and Water, seeking approval of the chemical risk assessment for Tetrahydro-3,5-dimethyl-1,3,5-thiadiazine-2-thione (Dazomet) / Methyl isothiocyanate (MITC) and glutaraldehyde in accordance with condition 22 of the above project under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Officers of the department have advised me on the chemical risk assessment and the requirements of the conditions of the approval for this project. On this basis, and as a delegate of the Minister for the Environment, I have decided to approve the use of Dazomet/MITC and glutaraldehyde. Use of these chemicals must now be undertaken in accordance with the approved Chemical Risk Assessment Framework, including the publishing of the chemical risk assessments.

Should you require any further information please contact Carl Zimmermann, Water Resources Regulatory Support, on 02 6275 9959 or postapproval@environment.gov.au.

Yours sincerely,

Kim Farrant
Branch Head
Environment Assessments (Vic and Tas) and Post Approvals Branch
Environment Approvals Division
27 October 2022



Australian Government

Department of Climate Change, Energy,
the Environment and Water

Ref: EPBC 2014/7376

██████████
Environmental Adviser
Environment and Access
Santos Ltd
60 Flinders St
ADELAIDE SA 5000

EPBC 2014/7376 – Narrabri Gas Project – Approval to use hydrochloric acid

Dear ██████████

Thank you for your correspondence of 3 May 2023 to the Department of Climate Change, Energy, the Environment and Water, seeking approval of the chemical risk assessment for hydrochloric acid in accordance with condition 22 of the above project under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Officers of the department have advised me on the chemical risk assessment and the requirements of the conditions of the approval for this project. On this basis, and as a delegate of the Minister for the Environment, I have decided to approve the use of hydrochloric acid. Use of this chemical must now be undertaken in accordance with the approved Chemical Risk Assessment Framework, including the publishing of the chemical risk assessment.

Should you require any further information please contact Derek Yates, within the Water Resources Regulatory Support section, at Derek.Yates@dcceew.gov.au (CC: WRRS@dcceew.gov.au).

Yours sincerely

Rachel Short
Branch Head
Environment Assessments (Vic and Tas) and Post Approvals Branch

11 July 2023

DCCEEW.gov.au

John Gorton Building - King Edward Terrace, Parkes ACT 2600 Australia
GPO Box 3090 Canberra ACT 2601 ABN: 63 573 932 849