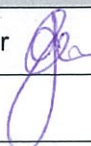
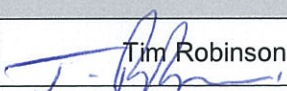
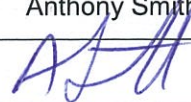


Coniston/Novara Field Development Project (EPBC 2011/5995) Annual Compliance Report 2018-2019

| | |
|---------------------------------|---|
| PROJECT / FACILITY | Coniston/Novara Field Development Project |
| REVIEW INTERVAL (MONTHS) | No Review Required |
| SAFETY CRITICAL DOCUMENT | NO |

| Rev | Owner | Reviewer/s <i>Managerial/Technical/Site</i> | Approver |
|-----|---|---|---|
| | Senior HSE Adviser, Oil Assets, Logistics | HSE Team Lead, Production | Manager – Oil Assets |
| 0 | Jason Crozier  | Tim Robinson  | Anthony Smith  |
| | | | |
| | | | |
| | | | |

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| Rev | Rev Date | Author / Editor | Amendment |
|-----|------------|-------------------|-----------------------------------|
| A | 10/4/2019 | Michelle Morrison | Draft version for internal review |
| 0 | 13/05/2019 | Diana Della Penna | Issue for Submission |
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1. Introduction

1.1 Overview

This report addresses compliance with each of the conditions of the Coniston/Novara Field Development Project, Western Australia approval EPBC 2011/5995.

Specifically, this report has been prepared to meet the requirements of Condition 3 of EPBC 2011/5995:

Within three months of every 12 month anniversary of the commencement of the action, the person taking the action must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of any management plans as specified in the conditions. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of this approval must be provided to the department at the same time as the compliance report is published.

The approved action commenced on 3 February 2013 (Novara) & 14 February 2013 (Coniston). This is the fifth annual compliance report for EPBC 2011/5995, and covers the period 3 February 2018 to 3 February 2019 (referred to herein as the '2018-2019 reporting period').

The report has been prepared in accordance with the Department of the Environment and Energy Annual Compliance Report Guidelines, 2014 (referred to herein as the Guidelines).

1.2 Change in Titleholder

On 27 November 2018, Santos completed its acquisition of Quadrant Energy. This has the effect that Santos Limited is now the ultimate holding company of Quadrant Energy Holdings Pty Ltd and its subsidiaries, however ABN and ACN remain unchanged. Santos and its affiliates have assumed responsibility for all commitments and obligations pursuant to the Coniston/Novara Field Development Project, Western Australia approval EPBC 2011/5995.

1.3 Terms, Definitions and Abbreviations

The terms, definitions and abbreviations used in this report are listed below in **Table 1-1**.

Table 1-1: Terms, Definitions and Abbreviations

| Abbreviation | Description |
|--------------|--|
| CMMS | Computerised Maintenance Management System |
| CN | Coniston Novara |
| Cth | Commonwealth |
| CST | Crisis Support Team |
| DC | Drill Centre |
| Department | Department of the Environment and Energy |
| DoEE | Department of the Environment and Energy (previously known as Department of Environment) |
| DoT | Department of Transport |
| DSEWPac | Department of Sustainability, Environment, Water, Population and Communities |
| EPBC | Environment Protection and Biodiversity Conservation |
| EPBC Act | <i>Environment Protection and Biodiversity Conservation Act 1999</i> |

| Abbreviation | Description |
|----------------------|--|
| EP | Environmental Plan |
| FPSO | Floating, Production, Storage and Offloading |
| Guidelines | Environment Annual Compliance Report Guidelines, Department of the Environment, 2014 |
| HSE | Health, Safety and Environment |
| ICT | Incident Command Team |
| IMT | Incident Management Team |
| MoC | Management of Change |
| NOPSEMA | National Offshore Petroleum Safety and Environmental Management Authority |
| NV | Ningaloo Vision |
| NV EP | NOPSEMA Approved Environmental Plan - Ningaloo Vision Operations Environmental Plan WA-35-L Van Gogh/Coniston/Novara Fields TV-00-RI-00003 |
| NVO OPEP | Ningaloo Vision Operations Oil Pollution Emergency Plan (Van Gogh and Coniston Novara fields) |
| PLEM | Pipe Line End Manifold |
| OPGGs(E) Regulations | <i>Commonwealth Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009</i> |
| OPEP | Oil Pollution Energy Plan |
| OSCP | Oil Spill Contingency Plan |
| OSMP | Operational and Scientific Monitoring Program |
| OSV | Offshore Support Vessel |
| OSRC | Oil Spill Response Capability |
| OSR | Oil Spill Response |
| SDU | Subsea Distribution Units |
| XT | Christmas Tree |

2. Declaration of Accuracy

In accordance with the Department's Guidelines, Santos WA Energy Limited as the approval holder makes the following declaration.

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

Anthony Smith

Position

Manager – Oil Assets

Organisation

Santos WA Energy Limited (ABN 39 009 301 964)

Date

13/5/19

3. Approved Action

3.1 Regulatory Context

Santos Energy (formerly Quadrant Energy Australia Limited (Quadrant)) submitted a referral under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) to the then Commonwealth Department of Sustainability, Environment, Water, Population and Communities (DSEWPaC) on 13 June 2011 to develop the Coniston/Novara fields within the Exmouth sub-basin of the North West Shelf (EPBC 2011/5995).

The proposal was determined by DSEWPaC to be a “controlled action” on 15 July 2011, which was to be assessed on the basis of preliminary documentation and further information.

The proposed action was approved on 15 October 2012 under sections 130(1) and 133 of the EPBC Act, subject to conditions attached to the approval EPBC 2011/5995. The approval has effect until 1 January 2038.

Table 3-1: Details of Approved Action under EPBC 2011/5995

| | |
|--|---|
| EPBC number | 2011/5995 |
| Project name | Coniston/Novara Field Development Project, Western Australia |
| Approval holder | Santos WA Energy Limited (Formerly Quadrant Energy Australia Limited) |
| ABN | 39 009 301 964 |
| Approved Action | To develop seven subsea production wells and related infrastructure in the Exmouth Sub-basin on the North West Shelf in water depths of approximately 400 metres, approximately 28 kilometres north of the Ningaloo Coast, with a production life of approximately 20 years; as described in the referral received by the department on 16 June 2011 [See EPBC Act referral 2011/5995]. |
| Date of commencement of the Project | 3 February 2013 (Novara) 14 February 2013 (Coniston) |
| Reporting Period for this Annual Compliance Report | 3 February 2018 to 3 February 2019 |

The environmental performance of the Coniston/Novara Field Development Project is also regulated by the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) in accordance with the Commonwealth *Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009* (OPGGs (E) Regulations).

The Coniston/Novara fields tie-back to the Van Gogh Field Development (and Ningaloo Vision Floating, Production, Storage and Offloading (FPSO)) subsea infrastructure. This field is operated under the referral EPBC 2007/3213 for the Van Gogh Oil Field Operation and regulated by NOPSEMA under the OPGGS(E) Regulations.

This annual report is concerned with compliance with EPBC 2011/5995 only.

3.2 Description of Activities

3.2.1 Project Overview

The Coniston and Novara fields are located approximately 8 km north of the Ningaloo Vision FPSO (Van Gogh field) in the Exmouth Basin offshore North West Australia (**Figure 3-1**).

The Coniston/Novara Field Development Project is a subsea oil field development located in the Exmouth Basin offshore North West Australia. The Project involved the installation of hydrocarbon retrieval infrastructure from the Coniston and Novara oilfields (**Figure 3-1**) which tie-back to subsea infrastructure already in place

for the Santos WA Energy operated Van Gogh field development. The retrieved hydrocarbons are flowed back to the Ningaloo Vision FPSO for partial processing and offload (**Figure 3-2**). This Santos WA Energy-operated activity, a joint venture between Santos WA Energy and INPEX, commenced in late 2011 with first production on the 11th May 2015.

Further information is available on Santos website:

<https://www.santos.com/what-we-do/key-facts/public-notifications/>

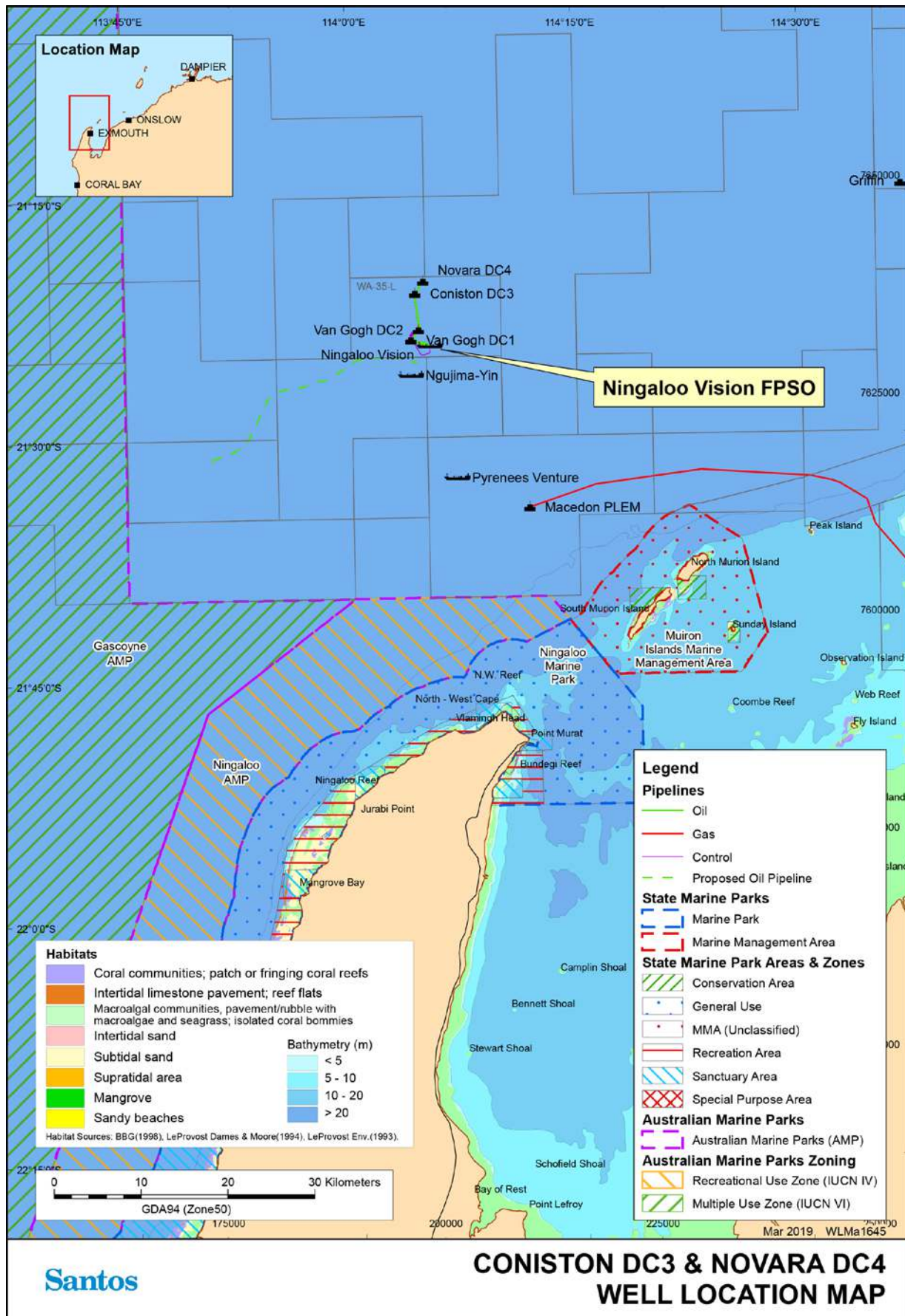


Figure 3-1: Coniston/Novara Field Location Map

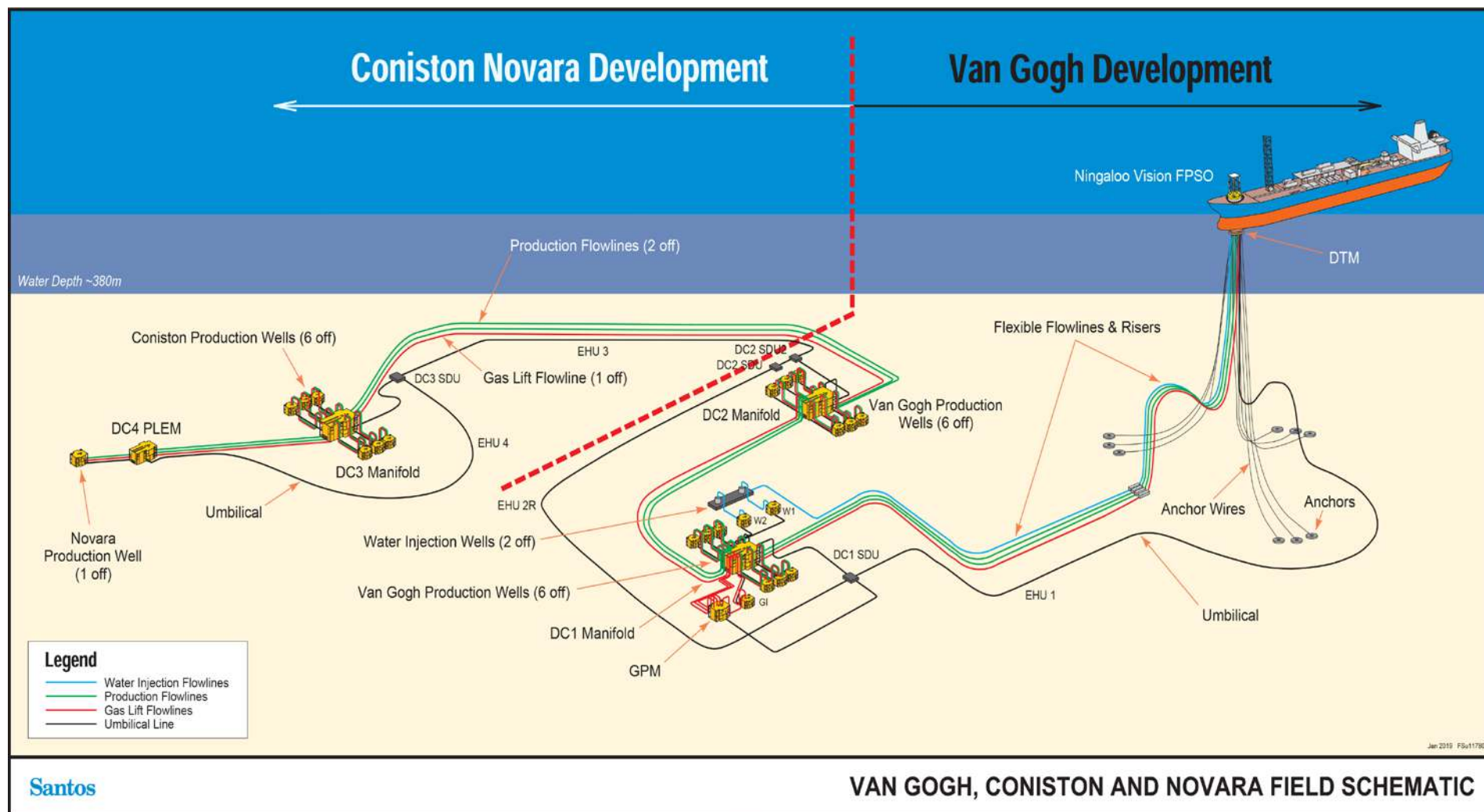


Figure 3-2: Schematic of the Coniston/Novara Development (including DC3 and DC4) and existing infrastructure of the Van Gogh Operation (including Ningaloo Vision FPSO, DC1 and DC2)

3.2.2 Activities Undertaken during the 2018-2019 Reporting Period

Activities completed during the 2018-2019 reporting period is summarised as follows:

| Date | Activity |
|--|---|
| 2018-2019 Reporting Period | |
| 4 th Feb 2018 | Completion of third cycle of gas injection in Coniston Well P31 |
| 10 th Feb 2018 | Coniston Well P31 back on production |
| 1 st Mar 2018 | Gas injection commenced in Coniston Well P34 |
| 22 nd Mar 2018 | Coniston Well P34 back on production |
| 4 th April 2018 | Coniston Well P34 shut in and gas injection |
| 23 rd April 2018 | Coniston Well P34 back on production |
| 12 th May 2018 | Field was shut down and the subsea system was de-pressurised in preparation for the scheduled shut-down |
| 12 th May to 26 th June 2018 | NV Maintenance Campaign Shutdown |
| 19-25 th June 2018 | Gas Injecting G1 Annulus Integrity Testing |
| 28 th June 2018 | Coniston field restarted |
| 25 th September | Gas Lift Jumper integrity testing |
| 13 th October 2018 | Well P9 shut in due to BOP movement as part of the Van Gogh Infill campaign at DC2 |
| 14 th October 2018 | ROV conducted inspection of Coniston Well P32 and Coniston Well P33 Gas Lift Jumpers - no leaks were evident |
| 30 th December 2018 | Coniston Well P34 & Coniston Well P35 gas lift jumpers isolated from subsea trees & gas lift headers and isolation valves tested in preparation for removal of gas lift jumpers |
| 13 th January 2019 | Van Gogh Infill Well P11 and P12 commenced production |
| 19 th January 2019 | Coniston Well P32 Gas Lift Jumpers isolated pending repair |
| 26-29 th January 2019 | Facility shutdown for threat of Tropical Cyclone Riley |
| 3 rd February 2018 – 03 rd February 2019 | Field production operations with a total of 7 crude offtakes completed. |

During the 2018-2019 reporting period, the following additional offshore support vessels (OSV's) were utilised by Santos WA to support field operations:

- MMA Cove (Contractor - Mermaid Marine)
- MMA Voyager (Contractor - Mermaid Marine)
- MMA Vision (Contractor - Mermaid Marine)
- Skandi Singapore (Contractor Sapura)
- Jetwave Maddison (Contractor Jetwave Marine Services)
- Jetwave Escape (Contractor Jetwave Marine Services)
- Jetwave Element (Contractor Jetwave Marine Services)
- Jetwave Lightning (Contractor Jetwave Marine Services)
- Maersk Master (Contractor - Maersk)
- Maersk Mariner (Contractor - Maersk)

- Siem Aquamarine (Contractor - SIEM)

The MMA Cove is the main vessel for Ningaloo Vision. Some other vessels were chartered but did not enter the operational area. The Maersk and Siem vessels were supporting the GSF Development Driller-1 (DD1) drilling campaign and may have dropped supplies to NV at times.

Two new wells in the Van Gogh field (VGB-14H and VGB-15H) were drilled by the mobile offshore drilling unit (MODU) - DD1 from 5th September 2018 to 4th January 2019. The activity was completed in accordance with the *Van Gogh, Coniston and Novara Drilling and Completions Environment Plan* (EA-00-RI-10060) and EPBC referral EPBC 2007/3495.

Tie-in of the Van Gogh wells was undertaken by the Skandi Singapore 31st December 2018 to 10th January 2019. The installation activity was completed in accordance with the *Van Gogh Infill Installation Environment Plan* (TV-35-RE-10001.01) and EPBC referral 2007/3213.

4. Compliance Assessment

4.1 Compliance Evaluation

Santos WA has based this assessment of compliance with EPBC 2011/5995 on the outcomes of internal environmental audits and inspections that were conducted during the 2018-2019 reporting period. These sources of information are discussed in the following sub-sections.

4.1.1 Incident Response Exercises

Santos WA undertook a total of eight (8) routine Level 1 (small scale) spill exercises on the Ningaloo Vision FPSO during the 2018-2019 reporting period as part of the Annual Drill Schedule. These exercises are designed to ensure that the response by personnel to an oil spill is in compliance with the approved Incident Response Plan and Oil Spill Contingency Plan. Any lessons learned from these exercises are reported and managed to ensure improvement in operating practices as per the Ningaloo Vision Incident Response Plan (TV-22-IF-00005, 404-OP-ERP-001).

In addition, Santos WA undertakes an annual major spill exercise each year where the office based Incident Management Team (IMT) and Crisis Support Team (CST) are stood up to respond to a simulated major oil spill from a Santos WA facility or activity. These exercises test arrangements applicable for responding to a Ningaloo Vision spill and provide training to IMT/CST members in spill response management. The last major spill exercise was held in June 2018. Santos WA furthermore, undertakes an annual program of deployment and testing of oil spill response equipment to ensure the ongoing familiarity with, and functionality of, the equipment. This is done at Exmouth, Dampier and Varanus Island with the deployment exercise at Exmouth testing first strike equipment that would be deployed to a major Ningaloo Vision spill. The last Exmouth deployment exercise took place in October 2018 and tested deployment of offshore containment and recovery equipment and vessel dispersant spray systems.

4.1.2 Environmental Audits and Inspections

Internal audits and inspections are a key component of Santos WA's compliance assurance program for EPBC 2011/5995.

During the 2018-2019 reporting period, a number of environmental audits and inspections were undertaken by Santos WA. The audit / inspection process involves a desktop review of documentation and records, interviews with relevant personnel and field observations in accordance with Santos WA Assurance Procedure (QE-91-IQ-10022). The audits / inspections conducted by Santos WA aim to identify non-conformances against audit criteria drawn from the current in force Ningaloo Vision Operations Environment Plan (EP) (TV-00-RI-00003) and other environmental standards and requirements maintained by Santos WA.

The environmental inspections or in-field audits identified zero non-compliance against any EPBC condition and matters of national environmental significance.

Table 4-1 provides an overview of the environmental audits and inspections conducted of relevance to EPBC 2011/5995 during the 2018-2019 reporting period. The referral conditions are incorporated as measurement criteria in the commitments register assigned to the accepted EP and Santos WA ensures that each commitment is inspected at least once annually.

Table 4-1: Environmental Audits and Inspections Conducted during the 2018-2019 reporting period relevant to activities conducted under EPBC 2011/5995

| Date | Facility / Vessel | Audit / Inspection Type | Audit / Inspection Criteria |
|---|------------------------------|--|---|
| 27 th - 29 th March 2018 | NV FPSO | Q1 HSE Audit | To assess compliance to routine discharges to the marine environment meet design and legislative requirements as per the Environmental Plan. |
| 30 th July 2018 | NV FPSO | Q2 HSE Audit | To assess compliance to Section 7 “No Unplanned Release of Crude Oil to the Marine Environment” and Section 6 “No unintended disturbance to the seabed and marine environment within the Operational Area” of the Ningaloo Vision Operational Environment Plan. |
| 27 th September 2018 | NV FPSO | Q3 HSE Audit | To assess compliance to relevant performance standards for Section 8 Environmental Implementation Strategy and Sections 10.7 & 10.8 Stakeholder Consultation within the Operational Area of the Ningaloo Vision Operational Environment Plan. |
| 6 th – 8 th November 2018 | NV FPSO | Q4 HSE Audit | To assess Section 6.5 Planned Discharges to the Marine Environment. |
| Ongoing | Offshore Support Vessels | Daily and weekly checklists | Ningaloo Vision Operations Environmental Plan WA-35-L Van Gogh/Coniston/Novara Fields (TV-00-RI-00003) Environmental Compliance Requirements for Marine Vessels Procedure (EA-91-IH-10001). |
| Ongoing | Offtake Tankers | Offtake tankers questionnaires | Ningaloo Vision Operations Environmental Plan WA-35-L Van Gogh/Coniston/Novara Fields (TV-00-RI-00003) Berthing and Terminal Handbook (TV-22-IG-00067). |
| Ongoing | NV FPSO & Quadrant ICT & IMT | Exercise OSRC by the deployment/ inspection of OSR equipment and personnel | Ningaloo Vision Operations Oil Pollution Emergency Plan (Van Gogh and Coniston-Novara fields) TV-00-RI-00003.02 and applicable plans/procedures. |

4.1.3 Environmental Audits Conducted by Regulators

On the 28-29 November 2018, NOPSEMA conducted an office based inspection of the Ningaloo Vision facility which focused on compliance with the requirements of the Ningaloo Vision Operations Environment Plan (TV-00-RI-00003). This inspection scope did not specifically focus on any EPBC conditions. There were no NOPSEMA inspection findings/recommendations relevant to the EPBC conditions (NOPSEMA Annual Environmental Audit Report No. 1611, document number A585172). No other environmental audits carried out by regulatory authorities occurred during the 2018-2019 reporting period.

4.2 Compliance Designations

In accordance with the department's Guidelines, **Table 4-2** describes the compliance designations used in this report.

Table 4-2: Compliance Designations

| | |
|-----------------------|--|
| Compliant | 'Compliance' is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions. |
| Non-compliant | A designation of 'non-compliance' should be given where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met. |
| Not applicable | A designation of 'not applicable' should be given where the requirements of a condition or elements of a condition fall outside of the scope of the 2018-2019 reporting period. For example a condition which applies to an activity that has not yet commenced. |

4.3 Non-Compliance (2013-2015)

Finding: Non-Compliance against Condition 9.

As determined by the 2015 DoEE directed independent audit CN Field Development - Audit of EPBC 2011/5995 Conditions 30 July 2015 (42908865/R1801/M&C3964/0) - "There are inconsistencies in documents regarding the requirements for interactions with marine fauna; a number of documents do not allow for the fact that vessels must not approach within the caution zones when calves are present (i.e. 300m and 150m respectively for whales and dolphins)." This finding related to the drilling and construction stages of the activity that had been undertaken prior to the audit.

To address this finding, a review of the relevant documents regarding marine fauna interaction was completed to manage out inconsistencies and ensure alignment with Part 8 of the Environment Protection and Biodiversity Conservation Regulations 2000.

Santos WA Energy is compliant with Condition 9 in the reporting period 2018 – 2019, for the operation of the CN field.

4.4 2018 - 2019 Compliance Summary

Santos WA Energy's compliance with EPBC 2011/5995 for the 2018-2019 reporting period can be summarised as follows:

- Compliant: 7 conditions
- Non-compliant: 1 condition
- Not Applicable: 6 conditions

Table 4-3 details the conditions of approval under EPBC 2011/5995 for the Coniston/Novara Field Development Project and provides compliance status with regard to these conditions during the 2018-2019 reporting period.

Table 4-3: Compliance Summary for EPBC 2011/5995 Coniston/Novara Field Development Project for the 2018-2019 reporting period

| Condition Number | Condition | Compliance Status | Evidence/Comments |
|------------------|---|-------------------|--|
| 1 | Within 30 days after the commencement of the action, the person taking the action must advise the department in writing of the actual date of commencement. | Not Applicable | <p>The commencement date for the approved action was 03 February 2013. Therefore, Condition 1 did not apply during the 2018-2019 reporting period.</p> <p>On the basis of the above, Santos WA Energy considers that Condition 1 was not applicable during the 2018-2019 reporting year.</p> |
| 2 | The person taking the action must maintain accurate records, substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the management plans, required by this approval, and make them available upon request to the department. Such records may be subject to audit by the department or an independent auditor in accordance with section 458 of the EPBC Act, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the department's website. The results of audits may also be publicised through the general media. | Compliant | <p>Environmental records relating to activities undertaken for Coniston/Novara Field Development Project are maintained on Santos WA Energy's Document Management System. These include records relating to routine environmental monitoring activities conducted in accordance with relevant management plans, including the OPEP required by EPBC 2011/5995 and Environment Plans required under OPGGS (E) Regulations.</p> <p>Environmental audits and inspections provide evidence of compliance with record keeping requirements, as well as implementation of environment plans and environmental performance more generally (Section 4.1). The corrective and preventative actions arising from these audits and inspections are managed using an online tracking system which includes assignment of responsibilities, timeframes, and status reporting and close-out records.</p> <p>On the basis of the above, Santos WA Energy considers that it was in compliance with Condition 2 during the 2018-2019 reporting year.</p> |

| | | | |
|---|---|----------------|--|
| 3 | Within three months of every 12 month anniversary of the commencement of the action, the person taking the action must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of any management plans as specified in the conditions. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of this approval must be provided to the department at the same time as the compliance report is published. | Non-compliant | <p>The approved action commenced on 03 February 2013; therefore, annual compliance reports for EPBC 2011/5995 must be published by 03 May each year.</p> <p>Santos WA Energy published its annual compliance report for EPBC 2011/5995 for 2018-2019 on 14 May 2019 (available at: https://www.santos.com/what-we-do/key-facts/public-notifications/)</p> <p>On the basis of the above, Santos WA Energy considers that it was non-compliant with Condition 3 during the 2018-2019 reporting year.</p> |
| 4 | If the person taking the action wishes to carry out any activity otherwise than in accordance with the plans or programs as specified in the conditions, the person taking the action must submit to the department for the Minister's written approval a revised version of that plan or program. The varied activity shall not commence until the Minister has approved the varied plan or program in writing. The Minister will not approve a varied plan or program unless the revised plan or program would result in an equivalent or improved environmental outcome over time. If the Minister approves the revised plan or program, that plan or program must be implemented in place of the plan or program originally approved. | Not Applicable | <p>Activities during the 2018-2019 reporting period were carried out in accordance with the plans and programs as specified in the conditions of EPBC 2011/5995.</p> <p>No submissions to the department to vary the activity, plans or programs specified in EPBC 2011/5995 were made during the 2018-2019 reporting period.</p> <p>On the basis of the above, Santos WA Energy considers that Condition 4 was not applicable during the 2018-2019 reporting year.</p> |

| | | | |
|---|--|----------------|---|
| 5 | If the Minister believes that it is necessary or convenient for the better protection of World Heritage properties (sections 12 & ISA), National Heritage places (sections 158 & 15C), Listed threatened species and communities (sections 1.8 & 1.8A, Listed migratory species (sections 20 & 20A) and/or Commonwealth marine areas (sections 23 & 24A), the Minister may request that the person taking the action make specified revisions to the plan or program specified in the conditions and submit the revised plan or program for the Minister's written approval. The person taking the action must comply with any such request. The revised approved plan or program must be implemented. | Not Applicable | <p>No requests were made to Santos WA Energy by the Minister to revise the plans or programs specified in conditions of EPBC 2011/5995 during the 2018-2019 reporting period.</p> <p>On the basis of the above, Santos WA Energy considers that Condition 5 was not applicable during the 2018-2019 reporting year.</p> |
| 6 | If, at any time after 5 years from the date of this approval, the person taking the action has not substantially commenced the action, then the person taking the action must not substantially commence the action without the written agreement of the Minister. | Not Applicable | <p>The approved action substantially commenced on 03 February 2013. Therefore, this condition no longer applies.</p> <p>On the basis of the above, Santos WA Energy considers that Condition 6 was not applicable during the 2018-2019 reporting year.</p> |
| 7 | <p>Unless otherwise agreed to in writing by the Minister, the person taking the action must publish all plans or programs referred to in these conditions of approval on their website. Each plan or program must be published on the website within one month of being approved.</p> <p>Note: The Minister may agree in writing to exclude the requirement to publish information that is considered confidential.</p> | Compliant | <p>The below document was displayed on the Quadrant Energy website throughout the 2018-2019 reporting period.</p> <p>The DoT published an Offshore Petroleum Industry Guidance Note on December 2017 following a WA State & Industry Emergency Response Exercise in September 2017. In accordance with the Guidance Note, Quadrant Energy, prepared a revised version of the Ningaloo Vision Operations Oil Pollution Emergency Plan (Van Gogh and Coniston-Novara fields – Revision 3.1, dated 31 August 2017) to reflect administrative changes incorporated in DoT's Guidance Note.</p> <p>Following review and sign off by DoT, the revision of the OPEP was determined as administrative through Santos's Management of Change process (MoC 186), as the same response objectives and strategies have been retained. This version was published on the Quadrant Energy website on 5 April 2018 replacing the OSCP.</p> |

| | | | |
|----|--|--------------------------|--|
| | | | <p>Note: Redactions were made to the OPEP before publishing to address concerns relating to confidentiality and commercial sensitivity, in consultation and with the prior agreement of the department.</p> <p>On 27 November 2018 Santos completed its acquisition of Quadrant Energy. At this point, the abovementioned document continues to be displayed on the Quadrant Energy internet site.</p> <p>The conditions of EPBC 2011/5995 also refer to a Decommissioning Plan (Condition 14); however, this plan is not required until 12 months before commencement of the decommissioning phase.</p> <p>On the basis of the above, Santos WA Energy considers that it was compliant with Condition 7 during the 2018-2019 reporting year.</p> |
| 8 | The Exmouth Gulf must not be used by support vessels during the period 15 September to 31 October. | Not Applicable | This condition is not applicable for the 2018-2019 reporting period as there were no construction/drilling activities associated with Coniston Novara Field Development project during this period. |
| 9 | The person taking the action must implement cetacean and Whale shark (<i>Rhincodon typus</i>) interaction procedures for supply vessels and aircraft that are used to carry out the action, through all stages of the action from commencement. These procedures must be consistent with Part 8 of the Environment Protection and Biodiversity Conservation Regulations 2000 at a minimum, and must include provision of cetacean sightings reports to the department. | 2018 – 2019 Compliant | <p>Vessels and aircraft contracted to Santos WA implement the <i>Protected Marine Fauna Interaction and Sighting Procedure</i> (EA-91-II-00003) which is consistent with Part 8 of the Environment Protection and Biodiversity Conservation Regulations 2000, and includes reporting of cetacean sightings to the DoEE.</p> <p>As previously reported in 2016, the procedures implemented during the construction and drilling phases in 2013 – 2015 were not consistent with the requirements of Part 8 of the EPBC Regulations specifically only for the management of interaction with cetacean calves. All other aspects of the procedures and associated evidence e.g. training, reporting sightings etc. were consistent with the requirements of the EPBC Regulations 2000.</p> |
| 10 | The person taking the action must develop and submit to the Minister for approval, an Oil Spill Contingency Plan (OSCP) that demonstrates the response preparedness of the person taking the action for any spills, including from offshore wells and infrastructure, pipelines, construction and operation vessels. This must include | Compliant | Ongoing operations from the Coniston and Novara Development are managed under the Ningaloo Vision Operations Environment Plan and supporting OPEP. The following approved OPEP can be found on Santos WA Energy's website: https://www.santos.com/what-we-do/key-facts/public-notifications/ . |

the capacity to respond to a spill and mitigate the environmental impacts on World and National heritage values, the Commonwealth marine area and species listed as threatened or migratory under the EPBC Act. The OSCP must include, but is not limited to:

- a) Identification of sensitive areas, species or habitats that may be impacted by a potential spill, as determined by site-specific modelling of worst case scenario spills;
- b) Specific response measures for those sensitive areas, species or habitats and prioritisation of those areas during a spill response, including a net environmental benefit analysis of the response options;
- c) A description of resources available for use in containing and minimising impacts in the event of a spill and arrangements for accessing them;
- d) A demonstrated capacity to respond to a spill at the site. Identification of the response measures that can feasibly, and will, be applied within the first 48 hours of a spill occurring;
- e) Details of the insurance arrangements that have been made in respect of paying the costs associated with operational and scientific monitoring as outlined in the OSCP and Operational and Scientific Monitoring Program required under Conditions 10 and 11, and repairing environmental damage arising from potential spills, as determined from the results of the Operational and Scientific Monitoring Program;
- f) Training of staff in spill response measures and identifying roles and responsibilities of personnel during a spill response;

Ningaloo Vision Operations Oil Pollution Emergency Plan (Van Gogh and Coniston-Novara fields) (NVO OPEP).

NVO OPEP (above) addresses Condition 10 specifically as follows:

| Condition ref. | Key Sections in Ningaloo Vision Operations OSCP addressing EPBC 2011/5995 |
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| 10 a) | Section 3.3 - Predicted spill trajectory area, sensitivities and response priorities |
| 10 b) | Section 4 – Assess applicable response options |
| 10 c), d) | Section 8 – Source Control Plans 9 – Monitoring and Evaluate Plan 10 – Containment and Recovery Plan 11 – Dispersion Plan 12 – Protection and Deflection Plan 13 – Shoreline Clean-up Plan 14 – Oiled Wildlife Response Plan 15 – Waste Management Plan 16 – Operational and Scientific Monitoring Plan 17 – Forward Operations Plan 5-18 – Response Arrangements |
| 10 e) | Section 2.7 – Cost Recovery |
| 10 f) | Section 20.1 – CMT/IMT Training Section 20.2 – Oil Spill Responder Training |
| 10 g) | Section 7 – Notification and Reporting Plan |
| 10 h) | Section 20.1 – CMT/IMT Training Section 20.2 – Oil Spill Responder Training Section 20.3-20.5 – Response Testing, Testing Schedule & Audits |

| | <p>g) Procedures for reporting spill incidents to the department; and</p> <p>h) A demonstrated procedure for testing, maintenance and review of the OSCP.</p> <p>The OSCP must be submitted at least three months prior to the commencement of the action, or as otherwise agreed to in writing by the Minister. The person taking the action must not commence the action until the OSCP is approved by the Minister. The approved OSCP must be implemented.</p> <p>Note: If a legal requirement is held by the proponent that requires submission of a plan that meets the above requirements, that plan may be submitted for the purpose of this condition.</p> | | <p>With regard to implementation of the approved OPEPs, the key activities are the maintenance of training and ongoing competency of spill response personnel and the exercising and testing of personnel and equipment. For the reporting period this has been done as follows:</p> <ul style="list-style-type: none">• Personnel training and competency has been managed and recorded using Santos WA Energy training database.• Level 1 (small scale) spill exercises have been conducted on the Ningaloo Vision FPSO during the reporting period as part of the Annual Drill Schedule.• A larger Level 2/3 spill exercises involving the mobilisation and testing of external personnel and equipment and exercising of IMT/CMT roles was also completed for the reporting period in June 2018. This involved testing of arrangements relevant to the Ningaloo Vision Operations Oil Pollution Emergency Plan (Van Gogh and Coniston-Novara field). <p>On the basis of the above, Santo WA Energy considers that it was in compliance with Condition 10 during the 2018-2019 reporting year.</p> | | | | |
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| 11 | <p>The person taking the action must develop and submit to the Minister for approval, an Operational and Scientific Monitoring Program that will be implemented in the event of a spill to determine the potential extent and ecosystem consequences of such a spill, including, but not limited to:</p> <p>a) Triggers for the initiation and termination of the Operational and Scientific Monitoring Program, including, but not limited to, spill volume, composition, extent, duration and detection of impacts;</p> <p>b) A description of the studies that will be undertaken to determine the operational response, potential extent of impacts, ecosystem consequences and potential</p> | Compliant | <p>Ongoing operations from the Coniston and Novara Development are managed under the Ningaloo Vision Operations Environment Plan and supporting OPEP. The following approved OPEP can be found on Santos WA Energy website:</p> <p>https://www.santos.com/what-we-do/key-facts/public-notifications/</p> <p>Ningaloo Vision Operations Oil Pollution Emergency Plan (Van Gogh and Coniston-Novara fields) (NVO OPEP)</p> <p>NVO OPEP (above) addresses Condition 11 specifically as follows:</p> <table><tr><th>Condition ref.</th><th>Key Sections in Ningaloo Vision Operations OSCP addressing EPBC 2011/5995</th></tr><tr><td>11 a) 11 b)</td><td>Section 16.4 – Monitoring Background Section 16.5 - Scientific Monitoring Plan</td></tr></table> | Condition ref. | Key Sections in Ningaloo Vision Operations OSCP addressing EPBC 2011/5995 | 11 a) 11 b) | Section 16.4 – Monitoring Background Section 16.5 - Scientific Monitoring Plan |
| Condition ref. | Key Sections in Ningaloo Vision Operations OSCP addressing EPBC 2011/5995 | | | | | | |
| 11 a) 11 b) | Section 16.4 – Monitoring Background Section 16.5 - Scientific Monitoring Plan | | | | | | |

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| environmental reparations required as a result of the spill; | 11 c) | Section 2.7 – Cost Recovery |
| c) Details of the insurance arrangements that have been made in respect of the costs associated with operational and scientific monitoring and repairing any environmental damage arising from potential spills; | 11 d) 11 e) | Section 16.5 – Scientific Monitoring Plan |
| d) Inclusion of sufficient baseline information on the biota and the environment that may be impacted by a potential spill, to enable an assessment of the impacts of such a spill. This must include sufficient information to determine the impact on the Whale shark population that feeds in the Ningaloo Marine World Heritage Area, including the reliance of this population of Whale sharks on coral spawning in the World Heritage Area as opposed to other food sources. | 11 f) | Section 22 – Document Review and Revision |
| e) A strategy to implement the scientific monitoring plan, including timelines for delivery of results and mechanisms for the timely peer review of studies; and | | |
| f) Provision for periodic review of the program. | | |
| The OSMP must be submitted at least three months prior to the commencement of the action, or as otherwise agreed in writing by the Minister. The person taking the action must not commence the action until the OSMP is approved by the Minister. The approved OSMP must be implemented. | | |
| Note: If a legal requirement is held by the proponent that requires submission of a plan that meets the above requirements, that plan may be submitted for the purpose of this condition. | | |

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| On the basis of the above, Santos WA Energy considers that it was in compliance with Condition 11 during the 2018-2019 reporting year. |
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| 12 | <p>In the event of a spill, the person taking the action must pay all costs associated with:</p> <p>a) All operational and scientific monitoring undertaken in response to the spill, as outlined in the OSMP approved by the Minister under Condition 11;</p> <p>b) any environmental management and remediation and/or equivalent determined necessary by the results of the OSMP.</p> | Compliant | <p>During the period 2018-2019, Santos were operating under the Ningaloo Vision Operations Environment Plan WA-35-L (Van Gogh/Coniston/Novara fields) (TV-00-RI-00003) and the supporting OPEP.</p> <p>In accordance with Section 571(2) of the OPGGS Act, NOPSEMA require titleholders maintain financial assurance sufficient to give the titleholder carrying out the petroleum activity the capacity to meet the costs, expenses and liabilities that may result in connection with carrying out the petroleum activity. This includes the cost of spill response operational activities, including operational and scientific monitoring and remediation in response to a worst case oil spill. NOPSEMA have endorsed the APPEA methodology for calculating the appropriate levels of financial assurance for pollution incidents (refer NOPSEMA guideline N-04750-GL1381). Santos undertook the calculation for ongoing operations using data from spill modelling conducted for worst case spill scenarios in accordance with this APPEA methodology, and maintains insurances to cover these costs.</p> <p>During the December 2017 NOPSEMA inspection (5-7 December 2017), NOPSEMA reviewed the calculation and insurance certificates and determined that adequate financial assurance was in place for the activity (NOPSEMA Recommendations ID 1611-3 & 1611-4 in NOPSEMA Annual Environmental Audit Report No. 1611, document number A585172).</p> <p>On the basis of the above, Santos WA Energy considers that it was in compliance with Condition 12 during the 2018-2019 reporting year.</p> |
| 13 | <p>The development must be designed and constructed to allow for the complete removal of all structures and components above the seafloor during the decommissioning phase.</p> | Compliant | <p>As reported in the previous annual compliance report, the features of the engineering design that allow for removal of structures and components during decommissioning are described in the Coniston/Novara Construction and Installation Environment Plan. Installation and Retrieval Guidelines have also been developed for the subsea equipment. Key features of the design that will facilitate decommissioning include:</p> |

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| | | <ul style="list-style-type: none">• The Drill Centre (DC) 3 Manifold, DC 4 pipeline end manifold and Gas Production Manifold (PLEM) structures are designed for single lift recovery at decommissioning;• Flexible flowlines and umbilicals will be disconnected at the manifolds and Subsea Distribution Units (SDU) respectively and individually retrieved to surface;• Gas lift jumpers, electro-hydraulic flying leads and rigid tie-in spools are all designed for individual recovery;• The DC2 SDU and DC3 SDUs will be retrieved directly from the support frames on their respective mudmats and the mudmat base frames are provided with dedicated pad-eyes for lifting free from the seabed; and• The wells can be plugged and the casing cut internally below the mud line for Christmas Tree (XT) removal and abandonment. <p>On the basis of the above, Santos WA Energy considers that it was in compliance with Condition 12 during the 2018-2019 reporting year.</p> |
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| 14 | <p>The person taking the action must submit a Decommissioning Plan to the Minister for approval at least twelve months prior to commencement of the decommissioning phase. Appropriate consideration must be given to matters of national environmental significance as defined by the EPBC Act and the net environmental benefit analysis of pursuing the proposed plan.</p> <p>Note: If a legal requirement held by the person taking the action requires submission of a plan that meets the above requirements, that plan may be submitted for the purpose of this condition.</p> | Not applicable | <p>At the end of the commercial lifetime, the field will be decommissioned, involving the removal of all infrastructure and materials above the seabed.</p> <p>Therefore, Condition 14 did not apply during the 2018-2019 reporting period.</p> |
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