

**Santos Gas Field Development Project
(GFD Project)**

**EPBC Approval No. 2012 / 6615
Annual Environmental Return 2017**

Introduction

In November 2012, the Gas Field Development Project (the GFD Project) was referred to the Commonwealth Minister under the Commonwealth EPBC Act. The GFD Project is an extension of the existing approved GLNG gas field development and will involve the construction, operation, decommissioning and rehabilitation of an additional 6,100 production wells and the associated supporting infrastructure needed to provide additional gas. On 22 March 2016, the GFD project received conditional approval (EPBC Act Approval 2012/6615) from the Minister for the Environment.

The 2017 Annual Environmental Return (**2017 AER**) has been developed to satisfy Condition 34 of the EPBC Approval.

Condition 34 states:

*Unless otherwise agreed to in writing by the Minister, within three months of every 12 month anniversary of the **commencement** of the **action**, the **approval holder** must publish a report on its 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 details of 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. Reports must remain published for life of the approval.*

The date of commencement of the action was 20 November 2016. The relevant anniversary date of the EPBC Approval for the purposes of the 2017 AER is 20 February 2018.

The 2017 AER covers the period 20 November 2016 – 20 November 2017 (**AER Period**) and will be published on the internet by 20 February 2018. The following table outlines Santos' compliance with the conditions of the GFD approval during this period.

Condition	Compliance Notes
<p>1. For the purpose of the action, the approval holder must only construct coal seam gas production wells within the GFD Project Tenements shown at Attachment A.</p>	<p>All development including the construction of coal seam gas production wells was within the GFD Project Tenements shown at Attachment A.</p> <p>EPBC Act approval 2012/6615 was varied on 28 August 2017 to reflect contemporary project boundaries. To affect this change Attachment A was substituted with a new Attachment A.</p>
<p>2. The action is limited to a maximum of 6,100 coal seam gas production wells and associated infrastructure.</p>	<p>The action is limited to a maximum of 6,100 coal seam gas production wells. The number of production wells has not exceeded 6,100.</p>
<p>3. The maximum disturbance limits in Annex 1 apply to the action to protect those EPBC threatened species, EPBC communities and EPBC migratory species (identified in Annex 1) within the project area. The approval holder must not exceed these maximum disturbance limits.</p>	<p>The disturbance limits provide in Annex 1 have not been exceeded.</p>
<p>4. The approval holder must undertake pre-disturbance surveys of proposed disturbance areas, unless the approval holder has an alternative methodology to identify EPBC threatened species, EPBC communities and migratory species or habitat for an EPBC threatened species or EPBC migratory species approved by the Minister in writing.</p> <p><i>Note 1: The approval holder may submit the alternative methodology for identifying EPBC threatened species, EPBC communities or habitat for an EPBC threatened species as part of the Constraints Protocol required at condition 7.</i></p>	<p>An alternative methodology to identify EPBC threatened species, EPBC communities and migratory species or habitat for an EPBC threatened species or EPBC migratory species is provided in Appendix A of the Environmental Protocol for Constraints Planning and Field Development (Constraints Protocol). This Constraints Protocol was approved by the Minister in writing on 26 October 2016. The surveys conducted within this reporting period were undertaken in accordance with Appendix A of the Constraints Protocol.</p>
<p>5. Pre-disturbance surveys must be supervised by a suitably qualified person and undertaken in accordance with the Department's survey guidelines in effect at the time of the survey or other equivalent survey methodology</p>	<p>Surveys conducted within this reporting period were supervised by a suitably qualified person and accordance with Appendix A of the Constraints Protocol.</p>

Condition	Compliance Notes
<p>6. When an EPBC threatened species, EPBC community or EPBC migratory species found in the project area for which there is no maximum disturbance limit identified in <u>Annex 1</u>, the approval holder must notify the Department in writing within five business days of finding the EPBC threatened species, EPBC community or EPBC migratory species. The approval holder must cease any activities that may or will impact on that EPBC threatened species, EPBC community or migratory species until relevant management plans have been revised to address these impacts and approved by the Minister in writing</p>	<p>No EPBC threatened species, EPBC community or EPBC migratory species for which there is no maximum disturbance limit identified in Annex 1 was found in the project area during the reporting period.</p>
<p>7. The approval holder must submit an Environmental Protocol for Constraints Planning and Field Development (Constraints Protocol) for the Minister's written approval. The Constraints Protocol must:</p> <ul style="list-style-type: none"> a. detail the constraints which will apply to project activities with regard to their impact on EPBC threatened species, EPBC migratory species and their habitat, and to EPBC communities. b. be based on levels of constraints, including, but not limited to: <ul style="list-style-type: none"> i. the listing status of an EPBC threatened species and EPBC community; ii. the quality of the EPBC community and habitat for an EPBC threatened species and EPBC migratory species; iii. the number of different EPBC threatened species, EPBC migratory species and EPBC communities impacted by a project activity; and iv. the value of the EPBC community and habitat for an EPBC threatened species and EPBC migratory species in a regional context. 	<p>The Environmental Protocol for Constraints Planning and Field Development (Constraints Protocol) inclusive of the details required in Conditions 7a and 7b, was approved by the Minister in writing on 26 October 2016.</p>

Condition	Compliance Notes
<p>8. The approval holder must not commence the action until the Constraints Protocol is approved by the Minister in writing.</p>	<p>The Environmental Protocol for Constraints Planning and Field Development (Constraints Protocol) was approved by the Minister in writing on 26 October 2016. The action had not commenced before this date.</p>
<p>9. The approval holder must submit a Significant Species Management Plan for the Minister's written approval. The Significant Species Management Plan must include:</p> <ul style="list-style-type: none"> a. measures that will be taken to avoid, mitigate and manage impacts to EPBC threatened species and EPBC migratory species and their habitat, and EPBC communities during clearance of vegetation, including supervision by a suitably qualified person at all times during clearance of vegetation; b. measures that will be taken to avoid, mitigate and manage impacts to EPBC threatened species and EPBC migratory species and their habitat, and to EPBC communities during construction, operation and decommissioning of the action; c. details of how the approved Constraints Protocol has been applied to avoid and minimise impacts to EPBC threatened species and EPBC migratory species and their habitat and EPBC communities during construction, operation and decommissioning of the action; d. a monitoring program to determine the success of mitigation and management measures to ensure adaptive management for the duration of this approval; e. details of the timeframe for a regular review of the approved Significant Species Management Plan; and f. a discussion of relevant conservation advice, recovery plans and threat abatement plans and how measures proposed in the Significant Species Management Plan take into account relevant conservation advice and are consistent with the measures contained in relevant recovery plans and threat abatement plans 	<p>The Significant Species Management Plan (SSMP) inclusive of the details required in Conditions 9a and 9f, was approved by the Minister in writing on 27 October 2016.</p> <p>EPBC Act approval 2012/6615 was varied on 28 August 2017 to reflect contemporary project boundaries. In accordance with Condition 36, the SSMP was revised to reflect the project variation and Revision 1 of the SSMP was submitted to the Department on the 20 November 2017.</p>

Condition	Compliance Notes
<p>10. The approval holder must not commence the action until the Significant Species Management Plan has been approved by the Minister in writing. The approved Significant Species Management Plan must be implemented by the approval holder.</p> <p><i>Note 2: The approval holder may submit an update to an existing management plan as required under the conditions of approval for the GLNG project (EPBC 2008/4059) provided the relevant matters under the conditions of this approval are clearly and adequately addressed. The approval holder may prepare and align a management plan required under these conditions with the requirements of the Queensland Government, provided the relevant matters under the conditions of this approval are clearly and adequately addressed</i></p>	<p>The Significant Species Management Plan (SSMP) was approved by the Minister in writing on 27 October 2016. The action had not commenced before this date.</p>
<p>11. The approval holder must ensure that environmental offsets comply with the principles of the EPBC Act Environmental Offsets Policy.</p>	<p>All offsets delivered during the reporting period through the Stage 1 Offset Plan 2012 - 2021 comply with the principles of the EPBC Act Environmental Offsets Policy.</p>
<p>12. The approval holder may carry out the action in project stages. The approval holder must deliver environmental offsets for residual significant impacts to matters of national environmental significance for each project stage.</p>	<p>For the purposes of environmental offsets, Santos GLNG have carried out the approval in stages. Environmental offsets for residual significant impacts resultant from stage 1 have been delivered through the Stage 1 Offset Plan 2012 – 2021.</p>
<p>13. The approval holder must submit an Offset Management Plan for the Minister's written approval. The Offset Management Plan may be prepared and submitted to the Minister for written approval in stages. If the approval holder submits the Offset Management Plan in stages, each stage of the Offset Management Plan must correspond with a project stage.</p>	<p>The Stage 1 Offset Plan 2012 - 2021 was approved by the Minister in writing on 31 October 2016.</p>
<p>14. The Offset Management Plan must include:</p> <ul style="list-style-type: none"> a. a method for assessing residual significant impacts to EPBC threatened species, EPBC migratory species and EPBC communities; b. results from pre-disturbance surveys and/or an alternative 	<p>The Stage 1 Offset Plan 2012 – 2021, inclusive of the details required in Conditions 14a to 14k, was approved by the Minister in writing on 31 October 2016.</p>

Condition	Compliance Notes
<p>approved methodology (if used) for the project stage as required under conditions 4 and 5;</p> <ul style="list-style-type: none"> c. details of the offset areas required to address residual significant impacts to EPBC threatened species, EPBC migratory species and EPBC communities for the project stage; d. a survey and description of the current condition (prior to any management activities) of each offset area proposed, including existing vegetation (the baseline condition). This must include a shapefile of each offset property boundary; e. information about how the offset areas provide connectivity with other relevant habitats and biodiversity corridors, including a map depicting the offset areas in relation to other habitats and biodiversity corridors; f. performance and completion criteria for evaluating the management of the offset area, and criteria for triggering remedial action (if necessary); g. a description of the management measures that will be implemented for the protection of EPBC threatened species, EPBC migratory species and EPBC communities, including a discussion of how measures outlined take into account relevant conservation advice and are consistent with the measures in relevant recovery plans and threat abatement plans; h. a program to monitor and report on the effectiveness of these measures, and progress against the performance and completion criteria; i. a description of potential risks to the successful implementation of the plan, and a description of the contingency measures that would be implemented to 	

Condition	Compliance Notes
<p>mitigate against these risks;</p> <ul style="list-style-type: none"> j. a timeline for when actions identified in the Offset Management Plan will be implemented for each offset area; and k. the proposed legal mechanism for securing the offset 	
<p>15. The approval holder must not commence the action until the Offset Management Plan has been approved by the Minister in writing. The approved Offset Management Plan must be implemented by the approval holder.</p>	<p>The Stage 1 Offset Plan 2012 - 2021 was approved by the Minister in writing on 31 October 2016. The action had not commenced before this date.</p>
<p>16. The approval holder must register and legally secure offsets for the first project stage identified in the Offset Management Plan within two years of commencement of the action.</p>	<p>A Voluntary Declaration under the Queensland <i>Vegetation Management Act 1999</i> has been lodged with the Queensland Department of Natural Resources and Mines. Once the application has been accepted the Stage 1 Offset area will have been legally secured.</p>
<p>17. The approval holder must register and legally secure offsets for a project stage which are sufficient to acquit the residual significant impacts of that project stage.</p>	<p>A Voluntary Declaration under the Queensland <i>Vegetation Management Act 1999</i> has been lodged with the Queensland Department of Natural Resources and Mines. Once the application has been accepted the Stage 1 Offset area will have been legally secured.</p> <p>Stage 2 of the project has not commenced. An updated Offset Management Plan for Stage 2, inclusive of details in Conditions 18a – 18c, will be submitted for written approval by the Minister prior to commencement of Stage 2.</p>
<p>18. If the approval holder submits the Offset Management Plan in stages, the approval holder must prepare and submit an updated Offset Management Plan for each subsequent project stage, for written approval by the Minister. The updated Offset Management Plan must:</p> <ul style="list-style-type: none"> a. include the information required for the Offset Management Plan at condition 14 for the relevant project stage; b. include a reconciliation of actual residual significant impacts to EPBC threatened species, EPBC migratory species and EPBC communities against offsets secured for the previous project stage. The reconciled offset obligations may be subtracted from the obligations required for the subsequent project stage; and 	

Condition	Compliance Notes
<ul style="list-style-type: none"> c. demonstrate how the offset builds on offsets already secured for previous project stages and will contribute to a larger strategic offset for cumulative project impacts. 	
<p>19. The approval holder must not commence the subsequent project stage until:</p> <ul style="list-style-type: none"> a. the Offset Management Plan, updated for that project stage, has been approved by the Minister in writing; and b. the offset for that project stage has been registered and legally secured in accordance with Queensland legislation. 	<p>Stage 2 of the project has not commenced. An updated Offset Management Plan for Stage 2 will be submitted for written approval by the Minister prior to commencement of Stage 2.</p> <p>A Voluntary Declaration under the Queensland <i>Vegetation Management Act 1999</i> has been lodged with the Queensland Department of Natural Resources and Mines. Stage 2 of the project will not commence until the Stage 1 Offset area has been legally secured.</p>
<p>20. The approval holder must submit a Groundwater Management and Monitoring Plan (GMMP) for the written approval of the Minister who may seek the advice of an expert panel. The GMMP must contain:</p> <ul style="list-style-type: none"> a. details of a groundwater monitoring network for the measurement of impacts on water resources associated directly or indirectly with the action, including the ability to: <ul style="list-style-type: none"> i. provide for the early detection of any changes in the groundwater regime in terms of amplitude and frequency of fluctuations in water pressure, water level and water quality in groundwater systems and changes in connectivity with surface water; ii. monitor relevant formations to determine hydraulic connectivity and provide for early detection of impacts prior to reaching migration pathways to other formations (e.g. faults and unconformities known to connect two or more hydrogeological units); iii. monitor potential impacts on groundwater 	<p>An interim '<i>Groundwater Management and Monitoring Plan (GMMP) Project Stage 1</i>', inclusive of the details required in Conditions 20a and 20h, was approved by the Minister in writing on 5 October 2017. During the reporting period petroleum activities conducted under this approval were restricted to activities on Petroleum Lease (PL) 176. The GMMP for project Stage 1 was developed to monitor and manage groundwater impacts on PL 176.</p>

Condition	Compliance Notes
<p>dependent ecosystems, including spring based and non-spring based ecosystems, and provide for the early detection of impacts;</p> <ul style="list-style-type: none"> iv. monitor changes to the project area water balance; and v. monitor changes to water availability for water users and the environment. <p>b. details of a baseline monitoring data acquisition program for the action;</p> <p>c. a rationale for the design of the monitoring network with respect to the nature of potential impacts and the location and occurrence of matters of national environmental significance;</p> <p>d. details of proposed early warning indicators, trigger thresholds and limits for detecting impacts on groundwater levels and a description of how and when these measures will be finalised and subsequently reviewed in accordance with the requirements of the Underground Water Impact Report, including that groundwater drawdown does not exceed 0.2 metres at EPBC springs as a result of the project;</p> <p>e. details of a risk based exceedance response for the actions the approval holder will take, and the timeframes in which these actions will be undertaken, if early warning indicators or trigger threshold values are exceeded, including reporting of the location and severity of exceedance/s to the Minister;</p> <p>f. details of the timeframe for a regular review of the approved GMMP in accordance with the requirements of the Underground Water Impact Report, and the incorporation of the outcomes of any updates to the numerical groundwater model and water balance</p>	

Condition	Compliance Notes
<p>calculations;</p> <p>g. provisions to make monitoring results publicly available on the approval holder's website for the life of the project; and</p> <p>h. provisions to make monitoring data available to the Department and Queensland Government authorities (if requested) for inclusion in any cumulative impact assessment, regional water balance model, bioregional assessment or relevant research.</p>	
<p>21. The GMMP, including any revised plans, must be peer reviewed by a suitably qualified water resources expert/s approved by the Minister in writing. The peer review must be submitted to the Minister together with the GMMP and a statement from the suitably qualified water resources expert/s stating that they carried out the peer review and evaluated the adequacy of the monitoring, mitigation and management measures.</p>	
<p>22. The approval holder must not commence the extraction of water or coal seam gas until the GMMP has been approved by the Minister in writing. The approved GMMP must be implemented by the approval holder.</p>	<p>An interim '<i>Groundwater Management and Monitoring Plan (GMMP) Project Stage 1</i>' was approved by the Minister in writing on 5 October 2017 and was subsequently implemented. No water or coal seam gas was extracted prior to 5 October 2017.</p>
<p>23. The Minister may direct in writing that the approval holder cease water extraction from a coal seam gas well or coal seam gas wells when an early warning indicator, trigger threshold or limit is exceeded (required at condition 20d), and if the Minister is not satisfied that the action proposed or taken by the approval holder will remedy the situation. The Minister may direct the approval holder to implement alternative action at the expense of the approval holder.</p>	<p>No early warning indicator, trigger threshold or limit were exceeded during the reporting period.</p> <p>The minister did not make any directions to cease water extraction from a coal seam gas well/s.</p>
<p>24. If the Minister has directed in writing that the approval holder must cease water or coal seam gas extraction pursuant to condition 23, the approval holder must not recommence such activities until the Minister has given approval in writing for the</p>	

Condition	Compliance Notes
<p>recommencement of those activities. Approval to recommence activities may be subject to conditions that the Minister considers reasonable.</p> <p><i>Note 3: The approval holder may prepare and align the GMMP with the requirements of the UWIR, provided the relevant matters under the conditions of this approval are clearly and adequately addressed.</i></p>	
<p>25. The approval holder must submit a CSG Waste Management Plan (CSGWMP) for the written approval of the Minister. The CSGWMP must:</p> <ul style="list-style-type: none"> a. detail measures that will be implemented to avoid, mitigate and manage impacts to surface and groundwater resources, EPBC threatened species, EPBC migratory species and EPBC communities as a result of the production, storage and disposal of CSG produced water and waste products, during the life of the project; b. detail monitoring to measure the amount of CSG produced water and waste products produced; c. detail the storage, management and disposal of CSG produced water and waste products, including, but not limited to: <ul style="list-style-type: none"> i. beneficial reuse; ii. re-injection into groundwater aquifers; iii. irrigation; and iv. transfer to a licensed waste management facility. d. details of proposed early warning indicators, trigger thresholds and limits for detecting impacts on surface and groundwater quality; and e. details of a risk based exceedance response for the actions the approval holder will take, and the timeframes in which these actions will be undertaken, if early warning indicators or trigger 	<p>An interim 'Project Stage 1 Coal Seam Gas Waste Management Plan' (CSGWMP), inclusive of the details required in Conditions 25a and 25e, was approved by the Minister in writing on 5 October 2017. During the reporting period petroleum activities conducted under this approval were restricted to activities on Petroleum Lease (PL) 176. The interim CSGWMP was developed to monitor and manage production, storage and disposal of CSG produced water on PL 176.</p>

Condition	Compliance Notes
<p>threshold values are exceeded, including reporting of the location and severity of exceedance/s to the Minister.</p>	
<p>26. The Minister may direct in writing that the approval holder cease water or coal seam gas extraction from a coal seam gas well or coal seam gas wells when an early warning indicator, trigger threshold or limit is exceeded (required at condition 25d), and if the Minister is not satisfied that the action proposed or taken by the approval holder will remedy the situation. The Minister may direct the approval holder to implement alternative action at the expense of the holder.</p>	<p>No early warning indicator, trigger threshold or limit were exceeded during the reporting period.</p> <p>The minister did not make any directions to cease water extraction from a coal seam gas well/s.</p>
<p>27. The approval holder must not commence the extraction of water or coal seam gas until the CSGWMP has been approved by the Minister in writing. The approved CSGWMP must be implemented by the approval holder.</p> <p><i>Note 4: The release of CSG produced water to watercourses is not an element of the action assessed under the EPBC Act. If releases to watercourses are sought, and a significant impact to matters of national environmental significance is likely, a further referral will be required under the EPBC Act.</i></p>	<p>An interim CSGWMP was approved by the Minister in writing on 5 October 2017 and was subsequently implemented. No water or coal seam gas was extracted prior to 5 October 2017.</p>
<p>28. The approval holder must submit terms of reference for a chemical risk assessment of the chemicals proposed to be used in coal seam gas extraction to the Minister for written approval. The terms of reference must incorporate best practice risk assessment methodology for the assessment of the potential impacts of the chemicals proposed to be used in coal seam gas extraction on matters of national environmental significance.</p>	<p>The terms of reference for a chemical risk assessment incorporating best practice risk assessment methodology for the assessment of the potential impacts of the chemicals proposed to be used in coal seam gas extraction was submitted and approved by the minister on 20 October 2016.</p>
<p>29. The approval holder must submit a Water Quality Management Plan for the written approval of the Minister. The Water Quality Management Plan must include:</p> <ol style="list-style-type: none"> a. a chemical risk assessment of the chemicals to be used in coal seam gas extraction in accordance with the terms of reference approved under condition 28; b. a complete list of chemicals to be used in coal seam gas extraction for the purpose of undertaking the action. This list must include the chemical name, CAS registry number, likely quantities, 	<p>Santos GLNG Gas Field Development Project - Water Quality Management and Chemical Risk Assessment Plan- Revision 2 was approved on 3 November 2016. During the reporting period petroleum activities conducted under this approval were restricted to activities on Petroleum Lease (PL) 176. The interim Water Quality Management Plan was developed to monitor and manage the chemicals used in drilling on PL 176.</p>

Condition	Compliance Notes
<p>concentrations and the chemical's general purpose and function;</p> <p>c. a description of the scale of hydraulic fracturing proposed, including the likely number of wells, number of fracturing events per well and types of wells to be stimulated;</p> <p>d. consideration of the chemical life-cycle under specific site conditions at both the surface and subsurface;</p> <p>e. mitigation and management measures to reduce the risk to matters of national environmental significance to a low level for each chemical to be used in coal seam gas extraction;</p> <p>f. a monitoring and reporting framework to assess the efficacy of the mitigation and management measures identified in the plan (in accordance with condition 29e) and for the measurement and monitoring of fracture propagation;</p> <p>g. a schedule for the regular review of the Water Quality Management Plan including the inclusion of new chemicals; and</p> <p>h. a peer review by a suitably qualified chemical risk assessment expert/s. The peer review must include a statement from the suitably qualified chemical risk assessment expert/s stating that they carried out the peer review of the findings of the chemical risk assessment required at condition 29a and evaluated the adequacy of the monitoring, mitigation and management measures proposed in the Water Quality Management Plan.</p>	<p>Revision 5 of the Water Quality Management Plan was approved by the department on 5 October 2017. This version of the plan contemplated chemicals used in hydraulic fracturing.</p> <p>On 10 October 2017, Revision 6 of the Water Quality Management Plan was provided to the Department. This version contained an updated description of Project Stage 1 to be consistent with the earlier. This version was submitted in accordance with Condition 36.</p>
<p>30. The Water Quality Management Plan must be approved by the Minister in writing prior to the commencement of construction of coal seam gas production wells. All updates of the Water Quality Management Plan must be approved by the Minister in writing.</p>	<p>The construction of coal seam gas production wells had not occurred prior to 20 October 2016. All updated to the Water Quality Management Plan are detailed above.</p>
<p>31. The approved Water Quality Management Plan must be implemented by the approval holder. Chemicals must only be used in the manner identified in the approved Water Quality Management Plan:</p>	<p>The approved Water Quality Management Plan was implemented.</p>

Condition	Compliance Notes
<p>32. Within 20 days after the commencement of the action, the approval holder must advise the Department in writing of the actual date of commencement.</p>	<p>The GFD project officially commenced on 20 November 2016. The Department was notified in writing via a letter dated 21 November 2016.</p>
<p>33. The approval holder 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</p>	<p>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 have been maintained</p>
<p>34. Unless otherwise agreed to in writing by the Minister, within three months of every 12 month anniversary of the commencement of the action, the approval holder must publish a report on its 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 details of 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. Reports must remain published for life of the approval.</p>	<p>This document is the Annual Environmental Return. This report addresses compliance with each of the conditions of this approval.</p>
<p>35. Upon the direction of the Minister, the approval holder must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister. The independent auditor and audit criteria must be approved by the Minister prior to the commencement of the audit. The audit report must address the approved criteria to the satisfaction of the Minister.</p>	<p>During the reporting period there was no independent audit of compliance directed by the minister.</p>
<p>36. The approval holder may choose to revise a management plan approved by the Minister under conditions 9, 20, 25, and 29 without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the revised plan or strategy would not be likely to have a new or increased impact. If the approval holder makes this choice it must:</p> <p>a. notify the Department in writing that the approved plan or</p>	<p>All amendments made to management plans approved by the Minister under conditions 9, 20, 25, and 29 are discussed in the relevant sections above.</p> <p>Revision 2 of the SSMP and Revision 6 of the Water Quality Management Plan were submitted in accordance with this condition.</p>

Condition	Compliance Notes
<p>strategy has been revised and provide the Department with an electronic copy of the revised plan or strategy;</p> <ul style="list-style-type: none"> b. implement the revised plan or strategy from the date that the plan or strategy is submitted to the Department; and c. for the life of this approval, maintain a record of the reasons the approval holder considers that taking the action in accordance with the revised plan or strategy would not be likely to have a new or increased impact. 	
<p>37. The approval holder may revoke its choice under condition 36 at any time by notice to the Department. If the approval holder revokes the choice to implement a revised plan or strategy, without approval under section 143A of the Act, the plan or strategy most recently approved by the Minister must be implemented.</p>	<p>During the reporting period the choice provided for under condition 36 was not revoked.</p>
<p>38. If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the revised plan or strategy would be likely to have a new or increased impact, then:</p> <ul style="list-style-type: none"> a. condition 36 does not apply, or ceases to apply, in relation to the revised plan or strategy; and b. the approval holder must implement the plan or strategy most recently approved by the Minister. <p>To avoid any doubt, this condition does not affect any operation of conditions 36 and 37 in the period before the day the notice is given.</p> <p>At the time of giving the notice the Minister may also notify that for a specified period of time that condition 36 does not apply for one or more specified plans or strategies required under the approval.</p>	<p>During the reporting period no amendments were made to management plans approved by the Minister under conditions 9, 20, 25, and 29</p>

Condition	Compliance Notes
<p>39. Conditions 36, 37 and 38 are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised plan or strategy to the Minister for approval.</p>	
<p>40. If, at any time after 10 years from the date of this approval, the approval holder has not substantially commenced the action, then the approval holder must not substantially commence the action without the written agreement of the Minister.</p>	<p>The GFD project officially commenced on 20 November 2016. The Department was notified in writing via a letter dated 21 November 2016.</p>
<p>41. Unless otherwise agreed to in writing by the Minister, the approval holder must publish all management plans, strategies and reports, referred to in these conditions of approval on its website. Each management plan and/or strategy must be published on the website within 1 month of being approved by the Minister. All published reports must remain on website for the life of the approval</p>	<p>All management plans, strategies and reports, referred to in these conditions of approval were published on the Santos website within 1 month of being approved by the Minister. All published reports will remain on website for the life of the approval.</p>