

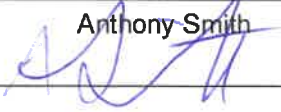


CO-00-RI-20002

Santos

## Coniston/Novara Field Development Project (EPBC 2011/5995) Annual Compliance Report 2019-2020

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

Rev	Owner	Reviewer/s <i>Managerial/Technical/Site</i>	Approver
	Environment Adviser	HSE Team Lead, Production	Manager – Oil Assets
0	Patrick Becker 	Tim Robinson 	Anthony Smith 

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Rev	Rev Date	Author / Editor	Amendment
A	15/05/2020	Diana Della Penna	Draft version for internal review
0	22/05/2020	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 sixth annual compliance report for EPBC 2011/5995 and covers the period 3 February 2019 to 3 February 2020 (referred to herein as the '2019-2020 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 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
Cth	Commonwealth
CST	Crisis Support Team
DAWE	Department of Agriculture Water and Environment (formerly Department of Environment and Energy)
DC	Drill Centre
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>
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
IMT	Incident Management Team
NC	Non-Conformance
NOPSEMA	National Offshore Petroleum Safety and Environmental Management Authority

Abbreviation	Description
NV	Ningaloo Vision
OFI	Opportunity for Improvement
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
PLEM	Pipe Line End Manifold
Q1	Quarter 1
Q2	Quarter 2
Q3	Quarter 3
Q4	Quarter 4
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

21/5/20

### 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 based on 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 2019 to 3 February 2020

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 11<sup>th</sup> May 2015.

Further information is available on Santos website:

<https://www.santos.com/about-us/corporate-governance/public-notice/>



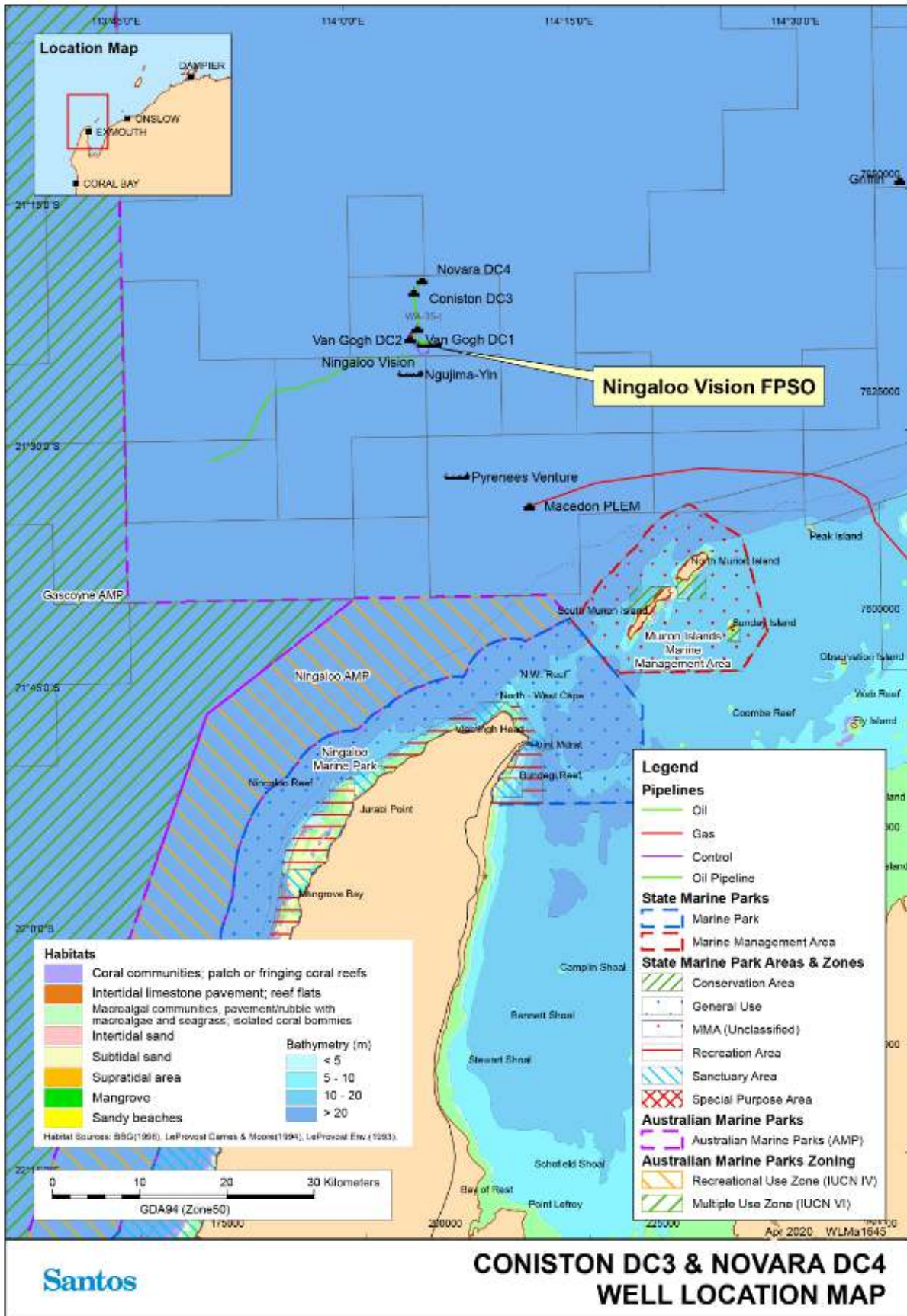
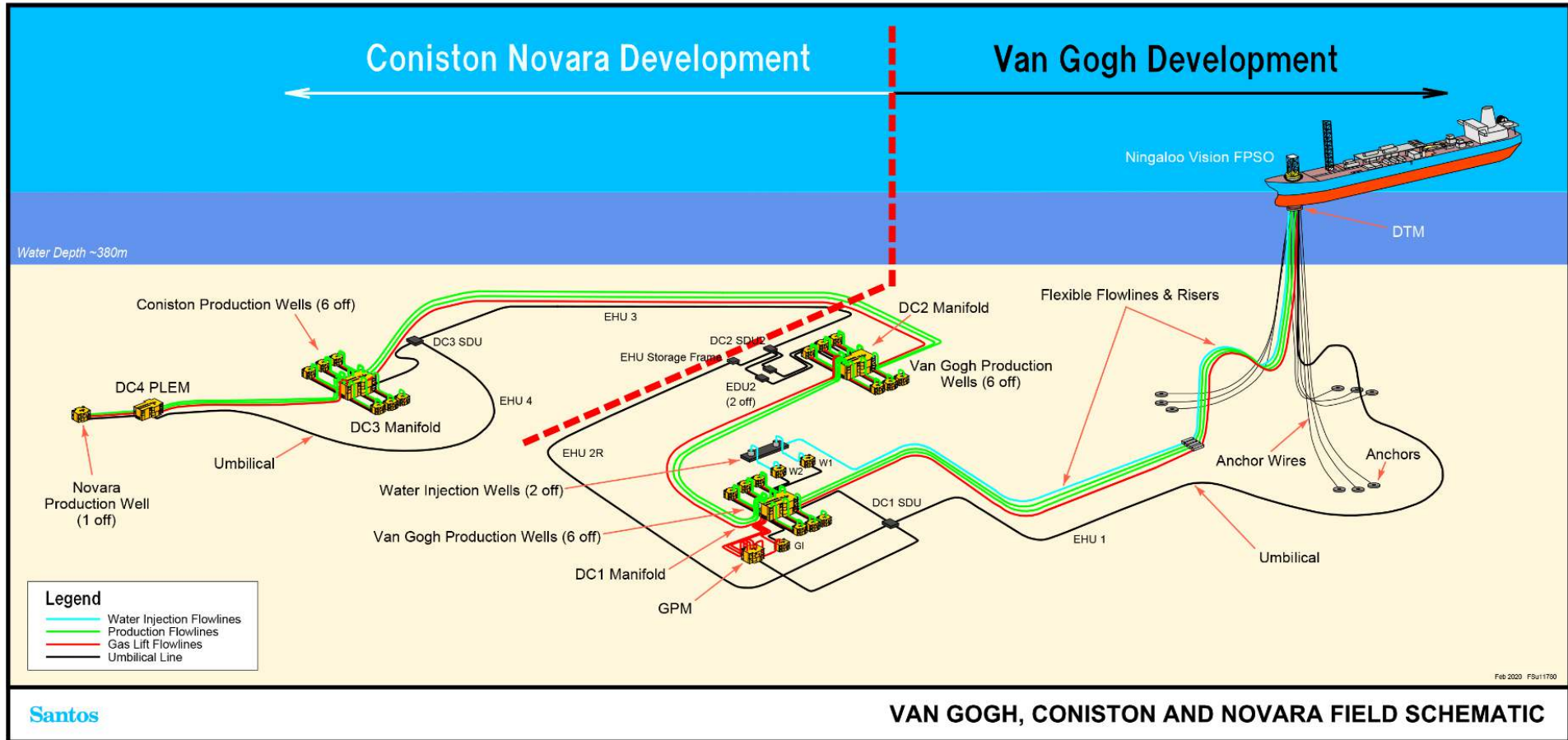


Figure 3-1: Coniston/Novara Field Location Map



**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)**

### 1.1.1 Activities Undertaken during the 2019-2020 Reporting Period

Activities completed during the 2019-2020 reporting period is summarised as follows:

Activity Name	Start	Finish
Offtake	3-Mar-19	4-Mar-19
Disconnect for Tropical Cyclone – Veronica Avoidance	21-Mar-19	26-Mar-19
Shutdown for Tropical Cyclone	06-Apr-19	11-Apr-19
Cargo Tank Inspection - 2C and 3C COT	14-Apr-19	19-Apr-19
Well Integrity Testing	22-Apr-19	29-Apr-19
Gas Lift Jumper Integrity Testing	25-Apr-19	30-Apr-19
Offtake	30-Apr-19	1-May-19
Well Integrity Testing	1-May-19	8-May-19
Offtake	30-May-19	31-May-19
Well Integrity Testing	4-Jun-19	11-Jun-19
Well Integrity Testing	24-Jun-19	1-Jul-19
Offtake	1-Jul-19	2-Jul-19
Facility Shutdown for PSV Recertification and ESD testing	2-Jul-19	16-Jul-19
Offtake	14-Aug-19	16-Aug-19
Facility Shutdown for PSV Installation	28-Aug-19	28-Aug-19
Offtake	14-Sep-19	16-Sep-19
Cargo Tank Inspection – 5C	22-Sep-19	1-Oct-19
Offtake	7-Oct-19	8-Oct-19
Gas Lift Jumper ROV Campaign - Trip 2 Phase 2 (Removal and replacement of P41 and P32 Gas Lift Jumpers)	23-Oct-19	9-Nov-19
Cargo Tank Inspection - 6C	5-Nov-19	16-Nov-19
Offtake	5-Nov-19	6-Nov-19
Offtake Santos	28-Nov-19	3-Dec-19
Cargo Tank Inspection - 7C	3-Dec-19	12-Dec-19
Offtake	30-Dec-19	31-Dec-19
Disconnect for Tropical Cyclone – Claudia Avoidance	13-Jan-20	19-Jan-20
Well Integrity Testing	18-Jan-20	22-Jan-20

During the 2019-2020 reporting period, the following Offshore Support Vessels (OSV's) were utilised by Santos WA to support field operations:

- Mermaid Cove (Contractor – Mermaid Marine Australia Offshore);
- Mermaid Vision (Contractor – Mermaid Marine Australia Offshore);
- Toll Provider (Contractor – Toll Marine);
- Skandi Singapore (Contractor – DOF Subsea);
- Jetwave Maddison (Contractor - Jetwave Marine Services);
- Jetwave Escape (Contractor - Jetwave Marine Services);
- Jetwave Element (Contractor - Jetwave Marine Services); and
- Jetwave Lightning (Contractor - Jetwave Marine Services).

During the reporting period, the Mermaid Cove was the main vessel supporting cargo supply and offtake support for Ningaloo Vision. Supply activities were also carried out by Mermaid Vision and Toll Provider for short durations throughout the year.

The Gas Lift Jumper Inspection Maintenance Repair (GLJIMR) scope involved repair, refurbishment and installation scope of work on the DTM Mooring and was executed in May – June 2019. DOF Subsea mobilised the Installation Support Vessel (ISV) '*Skandi Singapore*', and completed the DTM Mooring Survey Scope, GLJ change out at DC1 (x1), DC2 (x1) and 2 of the 4 GLJs at DC3. The installation campaign was completed in June, with the Skandi Singapore departing the field on Thursday the 6th of June.



## 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 2019-2020 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 four (4) routine Level 1 (small scale) spill exercises on the Ningaloo Vision FPSO during the 2019 – 2020 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. 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 as per the Ningaloo Vision Operations Oil Pollution Emergency Plan (TV-00-RI-00003.02) and provide training to IMT/CST members in spill response management. The last major spill exercise was held in November 2019 and was based on a Ningaloo Vision oil spill scenario. 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. A deployment exercise of dispersant spray systems and offshore containment and recovery equipment and a review of Forward Operating Base facilities was undertaken in Exmouth in November 2019. This equipment facilities would be potentially used in a response to a Ningaloo Vision oil spill.

#### 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 2019-2020 reporting period, numerous 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) and the Facility Safety and Environment (HSE Inspections) Procedure (TV-22-IF-10001). The audits and inspections conducted by Santos WA aim to ensure compliance to and identify non-conformances against 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 and in-field audits completed during the reporting period did not identify any non-compliance with any EPBC condition and matters of national environmental significance.

**Table 4-1** provides an overview of the environmental audits and inspections conducted during the 2019-2020 reporting period which are of relevance to EPBC 2011/5995. The referral conditions are incorporated as measurement criteria in the commitments register assigned to the accepted EP and Santos WA undertakes audits of selected criteria on annually basis.

**Table 4-1: Environmental Audits and Inspections Conducted during the 2019-2020 reporting period relevant to activities conducted under EPBC 2011/5995**

<b>Date</b>	<b>Facility / Vessel</b>	<b>Audit / Inspection Type</b>	<b>Audit / Inspection Criteria</b>
Monthly	NV FPSO	Monthly HSE Inspection Checklist	To assess compliance against various HSE requirements including specific criteria related to the accepted NV EP.
February 2019	NV FPSO	Ningaloo Vision 2019 Q1 Environmental Audit Report	The audit was completed within Santos Offices and assessed compliance with performance standards and compliance with specific elements to the EP. Three (3) NCs and One (1) OFI were identified. This audit did not identify any non-compliance against the EPBC conditions.
June – July 2019	NV FPSO	Ningaloo Vision 2019 Q2 Environmental Audit Report	The audit was conducted on board the Ningaloo Vision and assessed compliance with performance standards and compliance with specific elements to the EP. During the audit, evidence was available to demonstrate compliance with 65 requirements. Two (2) non-conformances and five (5) opportunities for improvement were identified. This audit did not identify any non-compliance against the EPBC conditions.
Nov 2019	NV FPSO	Ningaloo Vision 2019 Q3 Environmental Audit Report	The audit was conducted within Santos Offices and assessed compliance with performance standards and compliance with specific elements to the EP. During the audit, evidence was available to demonstrate compliance with 33 requirements. The audit also identified zero (0) non-conformances and four (4) opportunities for improvement. This audit did not identify any findings against the EPBC conditions.
Dec 2019	NV FPSO	Ningaloo Vision 2019 Q4 Environmental Audit Report	The audit was conducted within Santos Offices and assessed compliance with performance standards and compliance with specific elements to the EP. During the audit, evidence was available to demonstrate compliance with 36 requirements. The audit also identified two (2) non-conformances and six (6) opportunities for improvement. These audit findings and associated recommendations are entered in the Santos action tracking database (Enablon) for formal tracking and close out. This audit did not identify any non-compliance against the EPBC conditions.
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).

### 4.1.3 Environmental Audits Conducted by Regulators

No environmental audits were carried out by regulatory authorities during the 2019-2020 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**

<b>Compliant</b>	'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.
<b>Non-compliant</b>	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.
<b>Not applicable</b>	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 2019-2020 reporting period. For example, a condition which applies to an activity that has not yet commenced.

## 4.3 2019 - 2020 Compliance Summary

Santos WA Energy's compliance with EPBC 2011/5995 for the 2019-2020 reporting period can be summarised as follows:

- Compliant: 7 conditions.
- Non-compliant: 0 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 regards to these conditions during the 2019-2020 reporting period.

**Table 4-3: Compliance Summary for EPBC 2011/5995 Coniston/Novara Field Development Project for the 2019-2020 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 2019-2020 reporting period.</p> <p>Based on the above, Santos WA Energy considers that Condition 1 was not applicable during the 2019-2020 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 (<b>Section 4.1</b>). 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>Based on the above, Santos WA Energy considers that it was in compliance with Condition 2 during the 2019-2020 reporting year.</p>



3	<p>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.</p> <p>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.</p>	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. Due to the Covid-19 pandemic, an extension requested by Santos WA to submit the annual compliance report by 22 May 2020 was granted by the Department of Agriculture, Water and the Environment (Michaela Ballard) on 4 May 2020.</p> <p>Santos WA Energy published its annual compliance report for EPBC 2011/5995 for 2019-2020 on 22 May 2020 (available at: <a href="https://www.santos.com/about-us/corporate-governance/public-notice/">https://www.santos.com/about-us/corporate-governance/public-notice/</a>)</p> <p>Based on the above, Santos WA Energy considers that it was non-compliant with Condition 3 during the 2019-2020 reporting year.</p>
4	<p>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.</p>	Not Applicable	<p>Activities during the 2019-2020 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 2019-2020 reporting period.</p> <p>Based on the above, Santos WA Energy considers that Condition 4 was not applicable during the 2019-2020 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	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 2019-2020 reporting period.  Based on the above, Santos WA Energy considers that Condition 5 was not applicable during the 2019-2020 reporting year.
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	The approved action substantially commenced on 03 February 2013. Therefore, this condition no longer applies.  Based on the above, Santos WA Energy considers that Condition 6 was not applicable during the 2019-2020 reporting year.

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>During the reporting period 3 Feb 2019 to 3 Feb 2020, the Ningaloo Vision Operations Oil Pollution Emergency Plan (OPEP) was continuously available on the Santos Ltd website under Public Notifications (<a href="https://www.santos.com/about-us/corporate-governance/public-notice/">https://www.santos.com/about-us/corporate-governance/public-notice/</a>).</p> <p>There was no re-approval of the document during the reporting period. The OPEP has been revised (minor revision) and updated on the website subsequent to the reporting period.</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>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>Based on the above, Santos WA Energy considers that it was compliant with Condition 7 during the 2019-2020 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 2019-2020 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.	2019 – 2020 Compliant	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 Department of Agriculture Water and Environment (DAWE) (formerly Department of Environment and Energy).

<p><b>10</b></p>	<p>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 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:</p> <p>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;</p> <p>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;</p> <p>c) A description of resources available for use in containing and minimising impacts in the event of a spill and arrangements for accessing them;</p> <p>d) A demonstrated capacity to respond to a spill at the site. Identification of the response measures that can feasibly, and</p>	<p>Compliant</p>	<p>Ongoing operations from the Coniston and Novara Development are managed under the approved Ningaloo Vision Operations Environment Plan and supporting OPEP. The OPEP can be found on the Santos Ltd website: (<a href="https://www.santos.com/about-us/corporate-governance/public-notices/">https://www.santos.com/about-us/corporate-governance/public-notices/</a>).</p> <p>The current version the OPEP available on the Santos Ltd website addresses Condition 10 specifically as follows:</p> <table border="1" data-bbox="1234 448 2056 1342"> <thead> <tr> <th>Condition ref.</th> <th>Key Sections in Ningaloo Vision Operations OPEP addressing EPBC 2011/5995.</th> </tr> </thead> <tbody> <tr> <td>10 a)</td> <td>Section 3.3 - Predicted spill trajectory area, sensitivities and response priorities.</td> </tr> <tr> <td>10 b)</td> <td>Section 3.3 - Predicted spill trajectory area, sensitivities and response priorities. Section 6.2 - Applying Net Environmental Benefit Analysis.</td> </tr> <tr> <td>10 c), d)</td> <td>Sections: 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</td> </tr> <tr> <td>10 e)</td> <td>Section 2.7 – Cost Recovery</td> </tr> <tr> <td>10 f)</td> <td>Section 20.1 – CMT/IMT Training Section 20.2 – Oil Spill Responder Training Section 20.3 – Response Testing Section 20.4 – Testing Schedule</td> </tr> </tbody> </table>	Condition ref.	Key Sections in Ningaloo Vision Operations OPEP addressing EPBC 2011/5995.	10 a)	Section 3.3 - Predicted spill trajectory area, sensitivities and response priorities.	10 b)	Section 3.3 - Predicted spill trajectory area, sensitivities and response priorities. Section 6.2 - Applying Net Environmental Benefit Analysis.	10 c), d)	Sections: 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	10 e)	Section 2.7 – Cost Recovery	10 f)	Section 20.1 – CMT/IMT Training Section 20.2 – Oil Spill Responder Training Section 20.3 – Response Testing Section 20.4 – Testing Schedule
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10 f)	Section 20.1 – CMT/IMT Training Section 20.2 – Oil Spill Responder Training Section 20.3 – Response Testing Section 20.4 – Testing Schedule														

	<p>will, be applied within the first 48 hours of a spill occurring;</p> <p>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;</p> <p>f) Training of staff in spill response measures and identifying roles and responsibilities of personnel during a spill response;</p> <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,</p>		<table border="1"> <tr> <td data-bbox="1223 189 1391 236">10 g)</td> <td data-bbox="1391 189 2051 236">Section 7 – Notification and Reporting Plan</td> </tr> <tr> <td data-bbox="1223 236 1391 351">10 h)</td> <td data-bbox="1391 236 2051 351">Section 20.3 – Response Testing Section 20.4 – Testing Schedule Section 22 – Document Review and Revision</td> </tr> </table>	10 g)	Section 7 – Notification and Reporting Plan	10 h)	Section 20.3 – Response Testing Section 20.4 – Testing Schedule Section 22 – Document Review and Revision	<p>Based on the above, Santo WA Energy considers that it was in compliance with Condition 10 during the 2019-2020 reporting year.</p>
10 g)	Section 7 – Notification and Reporting Plan							
10 h)	Section 20.3 – Response Testing Section 20.4 – Testing Schedule Section 22 – Document Review and Revision							

	<p>that plan may be submitted for the purpose of this condition.</p>														
<p><b>11</b></p>	<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 environmental reparations required as a result of the spill;</p> <p>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;</p> <p>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</p>	<p>Compliant</p>	<p>Ongoing operations from the Coniston and Novara Development are managed under the Ningaloo Vision Operations Environment Plan and supporting OPEP. The OPEP outlines the operational and scientific arrangements that will be implemented in the event of a spill.</p> <p>The OPEP addresses Condition 11 specifically as follows:</p> <table border="1" data-bbox="1249 496 2047 967"> <thead> <tr> <th>Condition ref.</th> <th>Key Sections in Ningaloo Vision Operations OSCP addressing EPBC 2011/5995.</th> </tr> </thead> <tbody> <tr> <td>11 a) 11 b)</td> <td>Section 9 – Monitor &amp; Evaluate Plan (Operational Monitoring) and Appendix Q – Scientific Monitoring Plans.</td> </tr> <tr> <td>11 c)</td> <td>Section 2.7 – Cost Recovery.</td> </tr> <tr> <td>11 d)</td> <td>Section 16.5 – Scientific Monitoring Plan and Appendix Q – Scientific Monitoring Plans.</td> </tr> <tr> <td>11 e)</td> <td>Appendix Q – Scientific Monitoring Plans And Appendix S – SMP Activation Process and Form.</td> </tr> <tr> <td>11 f)</td> <td>Section 16.5 – Scientific Monitoring Plan.</td> </tr> </tbody> </table> <p>Based on the above, Santos WA Energy considers that it was in compliance with Condition 11 during the 2019-2020 reporting year.</p>	Condition ref.	Key Sections in Ningaloo Vision Operations OSCP addressing EPBC 2011/5995.	11 a) 11 b)	Section 9 – Monitor & Evaluate Plan (Operational Monitoring) and Appendix Q – Scientific Monitoring Plans.	11 c)	Section 2.7 – Cost Recovery.	11 d)	Section 16.5 – Scientific Monitoring Plan and Appendix Q – Scientific Monitoring Plans.	11 e)	Appendix Q – Scientific Monitoring Plans And Appendix S – SMP Activation Process and Form.	11 f)	Section 16.5 – Scientific Monitoring Plan.
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	<p>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.</p> <p>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</p> <p>f) Provision for periodic review of the program.</p> <p>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.</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>12</p>	<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</p>	<p>Compliant</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</p>

	<p>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>		<p>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>Based on the above, Santos WA Energy considers that it was in compliance with Condition 12 during the 2019-2020 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> <ul style="list-style-type: none"> <li>• 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;</li> <li>• Flexible flowlines and umbilicals can be disconnected at the manifolds and Subsea Distribution Units (SDU) respectively and individually retrieved to surface;</li> <li>• Gas lift jumpers, electro-hydraulic flying leads and rigid tie-in spools are all designed for individual recovery;</li> <li>• The DC2 SDU and DC3 SDUs can 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</li> <li>• The wells can be plugged and the casing cut internally below the mud line for Christmas Tree (XT) removal and abandonment.</li> </ul> <p>Based on the above, Santos WA Energy considers that it was in compliance with Condition 13 during the 2019-2020 reporting year.</p>



<b>14</b>	<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	The facility is still in the operational phase, so Condition 14 did not apply during the 2019-2020 reporting period.
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