



Executive Summary

Purpose

The Coal Seam Water Monitoring and Management Annual Report 2018 for the Santos GLNG Project, is required by the Commonwealth Department of the Environment (DOE).

This Annual Report:

- Has been prepared in accordance with Conditions 49 i) and 53 c)ix) of *the Environment Protection and Biodiversity Conservation Act 1999* (Commonwealth) (EPBC Act) Approval 2008/4059;
- Reports progress against the Santos GLNG Stage 2 CSG Water Management and Monitoring Plan (Revision 2) (Stage 2 CWMMP Rev 2); and
- Covers the period 1 January 2018 to 31 December 2018.

Approval Context

In October 2010, the Minister for the former Department of Sustainability, Environment, Water, Population and Communities (now DOE) granted the EPBC Approval under the EPBC Act, with various conditions. Conditions included the submission of a Stage 1 and Stage 2 Coal Seam Gas Water Monitoring and Management Plan (CWMMP) in which Santos GLNG made commitments for addressing the EPBC Act Approval conditions. The Stage 1 CWMMP and Stage 2 CWMMP Rev 2 were approved by the Minister for the Environment on 29 November 2013.

Features of this Annual Report

Santos GLNG is progressing as planned against the commitments in the Stage 2 CWMMP Rev 2. The Santos GLNG project continues to be developed and operated in a sustainable manner, with the appropriate mitigation measures implemented. The potential risk of adverse impact to Matters of National Environmental Significance (MNES) remains low.

Table A provides a summary of Santos GLNG's commitments made for the period covered in the Stage 2 CWMMP Rev 2 and provides a status update of progress up to the end of December 2018.



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Table A: Stage 2 CWMMP Rev 2 Commitments & Progress Update

● Commitment Complete; ► Commitment In Progress; ◆ Continuous Commitment

Condition	Commitment	Target Completion Date Specified in Stage 2 CWMMP Rev 2	Status	Annual Report Reference
49a, 49d,53c.vi	Groundwater Drawdown			
	Drawdown limits are now defined for the source aquifer at selected locations. These limits are subject to periodic updates.	Completed.	●	Section 3
	Installation of Early Warning Spring (EWS) monitoring network.	End 2016.	►	Section 3
	Ground truthing of a selection of springs to assess the presence of EPBC listed species and EPBC communities.	On and off tenure springs baseline initiated as part of the JIP, to be reported April 2015.	●	Section 3
	Santos GLNG will assume responsibility of mitigation (if required) for on-tenure springs and those off-tenement springs as will be assigned by the Surat Underground Water Impact Report (UWIR)/DOTE.	Ongoing.	◆	Section 3
	Comparison of drawdown to UWIR predictions will occur on a quarterly basis.	Quarterly.	◆	Section 3



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● Commitment Complete; ► Commitment In Progress; ◆ Continuous Commitment

Condition	Commitment	Target Completion Date Specified in Stage 2 CWMMP Rev 2	Status	Annual Report Reference
49b, 53b, 53d(i)4)	Aquifer Connectivity			
	Santos GLNG commits to provide further characterisation on the level of connectivity between the formations, including undertaking the following upcoming and ongoing hydraulic connectivity programs. Note that the results will be presented in future updates to the CWMMP.			
	Multi-level monitoring bores.	Ongoing monitoring and data assessment.	◆	Section 4
	Contact Zone Program.	Ongoing after installation.	►	Section 4
	Wallumbilla Fault Program.	Installation planned for 2014.	●	Section 4
	Aquifer Response.	Ongoing.	◆	Section 4
	Isotope and geochemical signature.	Ongoing.	◆	Section 4
	Pumping response observations and assessments.	Annually from 2014.	◆	Section 4
	The outcomes of the conventional oil and gas well and water bore risk assessment will be presented in an update to the CWMMP.	Updated CWMMP will be submitted for approval in due course.	►	Section 4



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● Commitment Complete; ► Commitment In Progress; ◆ Continuous Commitment

Condition	Commitment	Target Completion Date Specified in Stage 2 CWMMP Rev 2	Status	Annual Report Reference
49c, 53a, 53 d)ii	Aquifer Re-injection			
	Santos GLNG has developed a Managed Aquifer Recharge (MAR) pilot program and schedule for piloting of aquifer reinjection.			
	Fairview CSG Field Stage 1– Desktop Study.	Completed March 2012.	●	Section 5
	Roma CSG Field Stage 1– Desktop Study.	Completed January 2011.	●	Section 5
	Roma CSG Field Stage 2 – Investigations and Assessment.	Completed January 2011.	●	Section 5
	Roma CSG Field pilot trial (Hermitage) Stage 3 – Construction and Commissioning.	Completed Q1/Q2 2012.	●	Section 5
	Roma CSG Field pilot trial (Hermitage) Stage 4 – Operation.	Completed Q4 2012.	●	Section 5
	Roma CSG Field (The Bend) Stage 3 – Construction and Commissioning.	Due for completion Q3 2014.	●	Section 5
	Roma CSG Field (The Bend) Stage 4 – Operation.	Due to commence Q3/Q4 2014.	●	Section 5
	Arcadia Valley CSG Field Stage 1 – Desktop Study.	Completed September 2013.	●	Section 5
	All approved Injection Management Plans will be provided in an update to the CWMMP.	Ongoing.	◆	Section 5



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● Commitment Complete; ► Commitment In Progress; ◆ Continuous Commitment

Condition	Commitment	Target Completion Date Specified in Stage 2 CWMMP Rev 2	Status	Annual Report Reference
49e	<p>Hydraulic Fracturing</p> <p>Santos GLNG will provide a projection of the anticipated number of wells to be hydraulically stimulated during each year as well as the number of hydraulic stimulations completed in the preceding year. Additional details to be reported will also include location information and the depth of each respective hydraulic stimulation.</p>	Annually.	◆	Section 6
49f	<p>Santos GLNG has agreed with the DOTE to undertake additional Direct Toxicity Assessment that will include:</p> <ul style="list-style-type: none"> • an ecotoxicological program, involving, for example, a comparison of (i) coal seam water, (ii) coal seam water with hydraulic fracturing chemicals, and (iii) hydraulic fracturing chemicals in freshwater; • assessing the risk of individual hydraulic fracturing chemicals of concern; and • assessing contribution of hydraulic fracturing chemicals to toxicity of hydraulic fracturing fluids and flowback waters (mixture toxicity). <p>Santos GLNG is committed to undertaking these assessments, as part of the joint industry Ecotoxicity Work Program; the result of which will be provided to the DOTE upon completion.</p>	December 2013	●	Section 6



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● Commitment Complete; ► Commitment In Progress; ◆ Continuous Commitment

Condition	Commitment	Target Completion Date Specified in Stage 2 CWMMP Rev 2	Status	Annual Report Reference
49.g.iv)	Surface Water Baseline			
	Ongoing collection of surface water baseline data.	End of 2014.	●	Section 2
	EPBC spring hydrogeological conceptual model.	Initial conceptual models to be provided in November 2013.	●	Section 3
	Atmospheric pressure monitoring – 1 installation (barrologger or other) at each EPBC spring complex or cluster of spring complexes.	Completed.	●	Section 3
49.g.vi)	Surface Water Threshold Values			
	Collection and reviewing 2 years of baseline data and development of upper and lower confidence levels (Threshold values) for key parameters (relevant to MNES). These threshold values will be provided in an update to the CWMMP.	End of 2014. Completed, data acquisition ongoing.	●	Section 7
49.g.x)	Brine Management Plans			
	Provision of Brine Management Plans developed for Arcadia Valley, Roma and Fairview gas fields as a state government requirement within the respective gas field's environmental authorities (EA's). These will be provided in the next update to the CWMMP.	December 2014.	►	Section 8



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● Commitment Complete; ► Commitment In Progress; ◆ Continuous Commitment

Condition	Commitment	Target Completion Date Specified in Stage 2 CWMMP Rev 2	Status	Annual Report Reference
49i, 53c(ix)	Reporting			
	A Coal Seam Water Monitoring and Management Annual Report will be developed for each calendar year and submitted to the DOTE within the first quarter of the following year.	31 March 2017 and annually thereafter.	◆	Section 10
	Digital data can be provided to the DOTE on request.	Ongoing.	◆	Section 10
	Santos GLNG will publish the following reports on the internet (via the Santos Water Portal): <ul style="list-style-type: none"> ▪ Coal Seam Water Monitoring and Management Annual Report; and ▪ Link to the latest Surat Cumulative Management Area (CMA) Underground Water Impact Report (UWIR). 	Annually	◆	Section 10
	Santos GLNG will regularly publish data from the water monitoring network on the Santos Water Portal.	Ongoing	◆	Section 10
55	The next revision of the CWMMP is currently planned to be submitted to the DOEE 6 months after next revision of the UWIR.	Report to be submitted 3 months prior to first LNG cargo	►	Section 10



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● Commitment Complete; ► Commitment In Progress; ◆ Continuous Commitment

Condition	Commitment	Target Completion Date Specified in Stage 2 CWMMP Rev 2	Status	Annual Report Reference
53.c)iv)	Groundwater Baseline			
	Groundwater baseline data collection completion.	End of 2014.	●	Section 2
	Santos GLNG, in collaboration with the other Proponents (APLNG and QGC), will by the end of 2013 develop a statistical methodology to enable definition of significant exceedances from the baseline water pressure and water quality levels. The establishment of this methodology can only reasonably be commenced once the three Projects all have sufficient confirmation of their EPBC conditions being met by the respective CWMMPs.	Completed.	●	Section 3
53.d.i.III	Subsidence			
	The Subsidence Management Plan provides a response plan into exceedance of the defined subsidence trigger. The Subsidence Management Plan describes the monitoring undertaken to establish variation of ground level over time.	Completed.	●	Section 9
	Subsidence baseline.	Completed.	●	Section 9
	Monitoring through satellite measurements.	Ongoing.	◆	Section 9



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1.0 Introduction

1.1 Scope of the Annual Report

The Santos Gladstone Liquefied Natural Gas (GLNG) Coal Seam Water Monitoring and Management Annual Report 2017 (Annual Report) has been prepared in accordance with Condition 49 i) and 53 c)ix) of the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) Approval 2008/4059 (EPBC Approval). This Annual Report provides progress against commitments made in the Santos GLNG Stage 2 Coal Seam Gas Water Management and Monitoring Plan (Revision 2) (Stage 2 CWMMP Rev 2) for the period 1 January 2018 to 31 December 2018.

Annual Reports will be submitted to the Department of Environment and Energy (DOEE) by 31 March of each calendar year. Each Annual Report will cover the progress for the previous calendar year (January to December) against commitments made in the Stage 2 CWMMP Rev 2. The focus of this annual report is to:

- Document the progress against each commitment summarised in Table-A from 1 January 2018 to 31 December 2018; and
- Provide commentary on findings from completed work.

The report has been structured to present progress on commitments under the following subject areas:

- Section 1 Introduction;
- Section 2 Surface Water and Groundwater Baseline Monitoring;
- Section 3 EPBC Springs;
- Section 4 Aquifer Connectivity;
- Section 5 Managed Aquifer Recharge;
- Section 6 Hydraulic Fracturing;
- Section 7 Surface Water Monitoring;
- Section 8 Brine Management;
- Section 9 Subsidence;
- Section 10 Reporting; and
- Section 11 Third Party Audit

1.2 Project Context

In May 2010, the Queensland Coordinator-General approved the project under the *State Development and Public Works Organisation Act 1971*. In October 2010, the Minister for the former Department of Sustainability, Environment, Water, Population and Communities (now the Department of Environment and Energy (DOEE)) granted approval under the EPBC Act. The GLNG project area location is shown in Figure 1-1.

The EPBC Act provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities and heritage places — defined in the EPBC Act as Matters of National Environmental Significance (MNES). Accordingly, the CWMMP has been developed to manage the risk of adverse impact to MNES in relation to coal seam water management.

Santos GLNG prepared both Stage 1 and Stage 2 CWMMPs within the specified timeframes to meet the requirements of these conditions. The Stage 1 CWMMP and Stage 2 CWMMP Rev 2 were approved by the Minister for the Environment on 29 November 2013. The Stage 2 CWMMP Rev 2 fulfils the requirements of Conditions 49, 52 and 53.

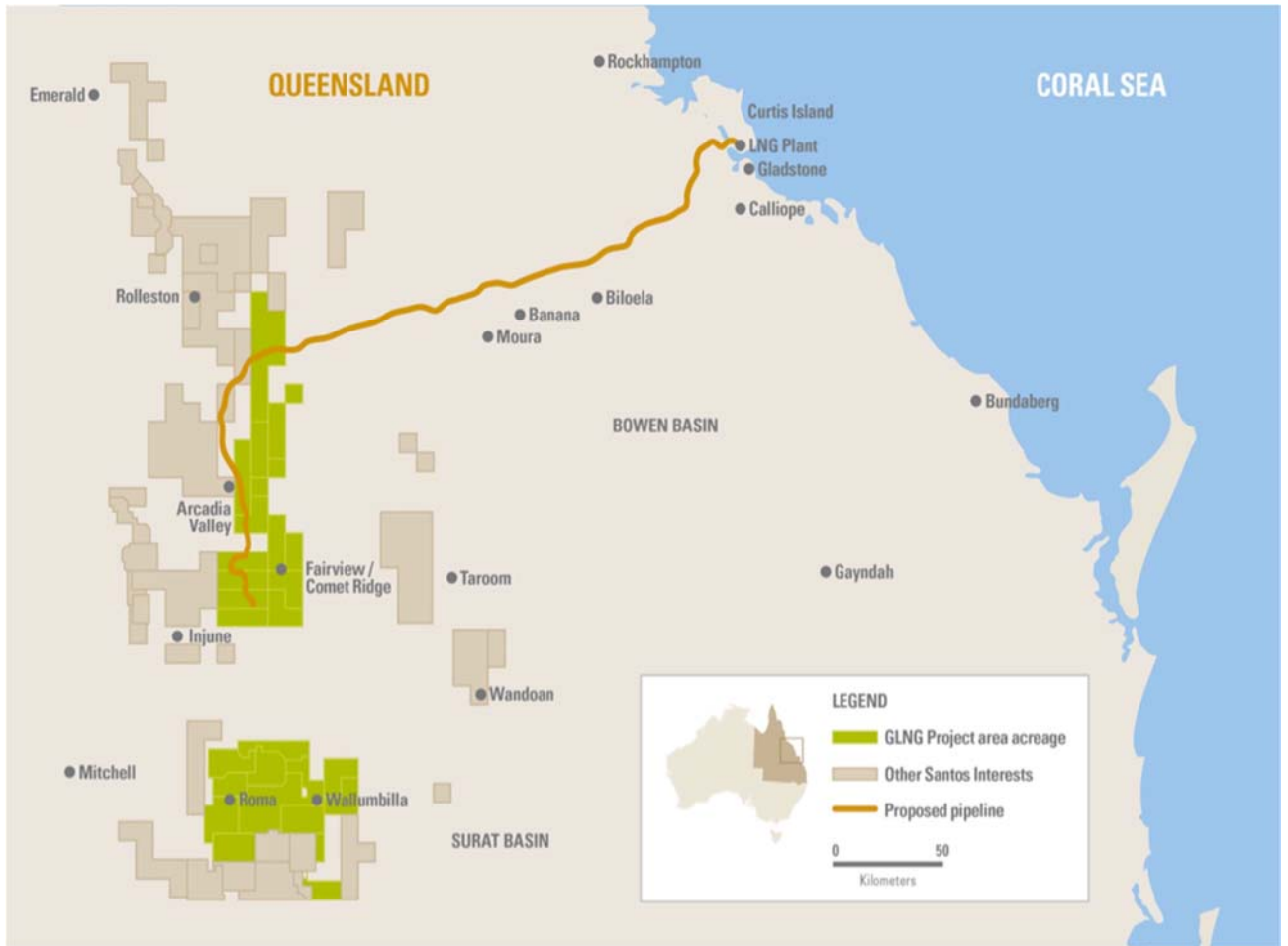


Figure 1-1: Santos GLNG Project Area

2.0 Surface Water and Groundwater Baseline Monitoring

2.1 Overview

Baseline surface water and groundwater data is information which establishes attributes of the water environment prior to the onset of development. This information can be used for comparison in the future to establish if changes have occurred. It may also be possible, dependent upon the nature of the change, to utilise baseline in order to establish a cause, i.e. being potentially related to development activities or not. In relation to MNES, baseline data may also be useful in determining meaningful targets for impact mitigation and management controls.

The water quality baseline data that has been collected over several years, comprises:

- Baseline for surface water quantity and quality;
- Baseline for groundwater pressure and quality; and
- Baseline for springs and wetlands.

The period of data collection that may be required to establish baseline will be location specific, and depend upon the nature of the environment being monitored. This is the case where ambient groundwater conditions are inter- and intra-seasonally dynamic, and affected by a number of interdependent variables such as rainfall, evapotranspiration potential, localised and regional groundwater abstraction activity, land-use changes and more.

Groundwater monitoring may be ongoing throughout the life of Santos GLNG development. It is expected that in most instances, monitoring will continue to gather data many years in advance of potential discernible changes that may be linked to production activities, and therefore such data will continue to be considered baseline data. The need for and extent of ongoing monitoring, however, is dictated by the need to monitor and manage specific risks and therefore the potential need for impact mitigation to manage the risk of adverse impact to MNES. Groundwater monitoring proposed in respect of such risks, is described in more detail in the relevant chapters (Chapter 3 – EPBC Springs, Chapter 4 - Aquifer Connectivity and Chapter 5 - Managed Aquifer Recharge).

2.2 Coal Seam Water Monitoring and Management Plan Commitments

Table 2-1 provides an outline of the commitments made in the Stage 2 CWMMP Rev 2 specific to surface water and groundwater baseline monitoring and progress against each commitment.

Table 2-1: Stage 2 CWMMP Rev 2 Commitments – Surface Water and Groundwater Baseline Monitoring

Condition	Commitment	Target Completion Date Specified in Stage 2 CWMMP Rev 2	Status
53.c)iv)	Groundwater Baseline		
	Groundwater baseline data collection completion.	End of 2014.	Completed. Data acquisition ongoing.
49.g.iv)	Surface Water Baseline		
	Ongoing collection of surface water baseline data.	End of 2013.	Completed. Data acquisition ongoing.

2.3 Surface Water Baseline Monitoring

A surface water monitoring has been ongoing since 2003, with monitoring increasing significantly in 2009-2012 and included a number of perennial, ephemeral and spring sampling locations across the Roma, Fairview and Arcadia Valley gas fields. A total of 17 grab samples were collected in 2018 from perennial sampling points in the Dawson River in Fairview. A further 53 samples were taken from an waterhole adjacent to the Dawson River in Fairview.

Surface water baseline monitoring requirements have been met for both Fairview and Roma fields and associated surface water threshold values have been calculated.

2.4 Baseline for Regional Groundwater Pressure and Quality

Santos GLNG has implemented a program for the regional groundwater level monitoring of private bores, dedicated groundwater monitoring bores and multi-level monitoring installations (such as vibrating wire piezometers (VWPs)) since 2008. The groundwater level monitoring network extends across Santos GLNG tenures and across all relevant aquifers. Development of the monitoring network is ongoing based on field development, a summary of the currently active water level monitoring points, and the cumulative number of bores that have become active by the end 2018 are summarised in Table 2-2.

Table 2-2: Summary of Regional Groundwater Level Monitoring Points Active Year End 2018

Formation	Private Water Bores	GLNG Multi-level Monitoring Points	GLNG Dedicated Monitoring Bores	Total
Alluvium	2	-	-	2
Volcanics	1	-	-	1
Bungil Formation	1	-	-	1
Mooga Sandstone	6	10	4	20
Orallo Formation	8	3	4	15
Gubberamunda Sandstone	5	18	13	36
Westbourne Formation	-	10	-	10
Springbok Sandstone	-	6	-	6
Walloon Coal Measures (WCM, targeting various seams)	-	43	2	45
Eurombah Formation	-	1	-	1
Hutton Sandstone	-	1	4	5
Evergreen Formation	1	-	-	1
Boxvale Sandstone	-	-	-	-
Precipice Sandstone	3	2	18	23
Clematis Sandstone	-	-	2	2
Rewan Formation	1	-	-	1
Bandanna Formation	-	3	16	19
Unknown*	4	-	-	4
TOTAL	32	97	63	192

Notes: These numbers may differ from those in the 2016 Annual Report due to ongoing refinement of the monitoring network.

- no bores present.

* unknown indicates that the aquifer is to be confirmed through ongoing assessment.

Data source: Santos GLNG (as of December 2017).

Details of the groundwater quality monitoring program undertaken during 2018 are provided below. The summary includes groundwater quality samples taken from dedicated monitoring bores across Roma, Fairview and Arcadia Valley gas fields. Table 2-3 provides a summary of the number of currently active water quality monitoring points.

From January 2018 to December 2018, a total of 39 samples have been collected as part of the groundwater quality monitoring program.

- 21 samples from the Roma field;
- 14 samples from the Fairview field; and
- 4 samples for the Arcadia Valley field.

Table 2-3: Summary of the Number of Regional Groundwater Quality Monitoring Sampling Points in 2018

Formation	Number of sampling events
Mooga Sandstone	6
Orallo Formation	2
Gubberamunda Sandstone	10
Springbok Sandstone	1
Hutton Sandstone	4
Precipice Sandstone	12
Clematis Sandstone	4
TOTAL	39

Notes:

* unknown indicates that the aquifer is to be confirmed through ongoing assessment.

Data source: Santos GLNG (as of December 2018).

2.6 Baseline for Springs and Wetlands

Baseline conditions at EPBC-listed and non EPBC-listed springs have been established by the Office of Groundwater Impact Assessment (OGIA) on behalf of the CSG industry and are presented within reports by KCB (2012) and Queensland Herbarium (2012), outlined in the Surat Cumulative Management Area (CMA) Underground Water Impact Report (UWIR 2012, and UWIR 2016).

In addition to this baseline, Santos GLNG has initiated spring monitoring as required under the Surat UWIR and Santos GLNG approval conditions on Santos GLNG tenures. A joint industry spring baseline program was implemented consisted of quarterly monitoring events and inclusive of ecological and hydrogeological parameters monitoring. The findings of this monitoring is provided by Jacobs (2015) as has not been developed further. An update and forward work program will be provided in the next revision of the CWMMP.

3.0 EPBC Springs

3.1 Overview

Groundwater drawdown propagating from natural gas production has the potential to impact springs hosting ecological communities that are listed as MNES under the EPBC Act, or springs that are sourced from the Great Artesian Basin (GAB). These are known as “EPBC Springs”.

Operators in the southern Bowen and Surat Basins (Santos GLNG, Origin Energy and Origin Energy on behalf of APLNG and the Queensland Gas Company (QGC)) have developed a Joint Industry Plan (JIP) for a groundwater monitoring and management system to ensure EPBC Springs are not adversely impacted by groundwater drawdown associated with gas production.

The methodology for monitoring and management of EPBC Springs is defined in the JIP, which was approved by the Minister for the Environment in November 2013 and provided as an appendix to the Santos GLNG Stage 2 CWMMP Rev 2.

3.2 Coal Seam Water Monitoring and Management Plan Commitments

Table 3-1 provides an outline of Santos GLNG’s commitments presented in the Stage 2 CWMMP Rev 2, specific to EPBC Springs and progress against each commitment.

Table 3-1: Stage 2 CWMMP Rev 2 Commitments – EPBC Springs

Condition	Commitment	Target Completion Date Specified in the Stage 2 CWMMP Rev 2	Status
49a, 49d, 53c.vi	Drawdown limits are now defined for the source aquifer at selected locations. These limits are subject to periodic updates.	Completed.	Completed (2013).
	Installation of Early Warning Spring (EWS) monitoring network.	End 2016.	Ongoing (see Table 3-2).
	Ground truthing of a selection of springs to assess the presence of EPBC listed species and EPBC communities.	On and off tenure springs baseline initiated as part of the (JIP), to be reported in April 2015.	Completed (2015).
	Santos GLNG will assume responsibility of mitigation (if required) for on-tenure springs and those off-tenement springs as will be assigned by the Surat Underground Water Impact Report (UWIR)/DOEE.	Ongoing.	Ongoing.



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Condition	Commitment	Target Completion Date Specified in the Stage 2 CWMMP Rev 2	Status
	Comparison of drawdown to UWIR predictions will occur on a quarterly basis - Graphic comparisons will be provided in the Santos GLNG Annual Report for Early Warning System bores that Santos GLNG is responsible for.	Quarterly.	The methodology has evolved – once groundwater level reference values are defined, Santos GLNG is assessing the feasibility of programing a system of alerts in the database. Until then, three monthly data checks will be completed.
49.g.iv)	EPBC spring hydrogeological conceptual model.	Initial conceptual models to be provided in November 2013. Additional conceptual models will be provided at completion of spring baseline assessment (April 2015).	Completed April 2015.
	Atmospheric pressure monitoring – 1 installation (barrologger or other) at each EPBC Spring complex or cluster of spring complexes.	Completed.	Completed for on-tenure EPBC springs 2013.
53.c)iv)	Santos GLNG, in collaboration with the other Proponents (APLNG and QGC), will by the end of 2013 develop a statistical methodology to enable definition of significant exceedances from the baseline water pressure and water quality levels. The establishment of this methodology can only reasonably be commenced once the three Projects all have sufficient confirmation of their EPBC conditions being met by the respective CWMMPs.	Completed.	Ongoing. The JIP provided a statistical methodology for groundwater level trend analysis that has not yet been implemented in practice.

3.3 EPBC Springs Monitoring Progress

Details of activities undertaken during 2018 are summarised in the following subsections.

3.3.1 Progress on the EPBC Springs Early Warning System Implementation

The potential risk of impact on EPBC Springs continue to be monitored through a network of groundwater monitoring bores, providing early warning of potential impact propagating from the gas production towards the EPBC Spring in the source aquifer. The JIP defines the responsibilities for the implementation and monitoring of the groundwater monitoring bores.

There are 12 groundwater level monitoring installations which fall under Santos GLNG responsibility within the JIP, of which 10 are operational and the remaining one is scheduled for completion in 2019. One monitoring point is not required since there is no groundwater present. A summary status is provided in Table 3-2.

Table 3-2: Progress on EPBC Springs Early Warning System Monitoring Implementation

Bore	Lat. (WGS84)	Long. (WGS84)	Aquifer	EPBC Spring	Date Water Level Monitoring Commenced	Status
OKSGWP01	-25.8098	148.8276	Precipice Sandstone	Abyss, Lucky Last	December 2016	Active
MHTGWH01	-25.8250	148.7916	Hutton Sandstone	Abyss	Nov 2014	Active
MHTGWP01	-25.8250	148.7916	Precipice Sandstone	Lucky Last	Dec 2013	Active
MNHGWP02*	-25.7881	148.9233	Precipice Sandstone	Abyss, Lucky Last	Aug 2015	Active
AVLOP01	-25.9419	150.0742	Precipice Sandstone	Cockatoo Creek	Dec 2015	Active
AVLGWH	-25.9141	150.0736	Hutton Sandstone	Cockatoo Creek	Dec 2013	Active
AVLVWH1 AVLVWH2	-25.9379	150.0739	Hutton Sandstone	Cockatoo Creek	Dec 2012	Active
AVLVWP1 AVLVWP2	-25.9379	150.0739	Precipice Sandstone	Cockatoo Creek	Dec 2012	Active
EWMI7	-24.6074	149.0761	Clematis Sandstone	Elgin 2	-	To be equipped in 2018
SBNGWH01	-25.8263	149.0370	Hutton Sandstone	Yebna 2	-	No groundwater present
SBNGWP01	-25.8263	149.0370	Precipice Sandstone	Yebna 2	Nov 2014	Active
MW0902	-25.7347	149.0829	Precipice Sandstone	Yebna 2	Jan 2011	Active

Notes: * MNHGWP02 replaces MW0905 as originally specified in the JIP.

3.3.2 Spring Baseline Acquisition

The Industry has delivered quarterly spring baseline surveys throughout 2015. Surveys were conducted in 2016 in accordance with the requirements of the Spring Impact Monitoring Strategy outlined in the UWIR for the Surat CMA.

3.4 EPBC Spring Hydrogeological Conceptual Models

Using information collected during the baseline monitoring and additional research conducted both by the OGIA and by GLNG, the OGIA prepared conceptualisation reports for the EPBC listed spring sites. These conceptualisation reports were submitted to the DOTE in a letter from the OGIA dated 30th April 2015.

Re-conceptualisation of spring hydrogeology is proposed to be reported in the next revision to the CWMMP.

3.5 Assessment of Trends for Analysis of Groundwater Data

The definition of reference values is ongoing based on the period that the equipped monitoring bores have been able to gather data. Of the bores that have been equipped with monitoring, there are monitoring locations that have data over a period of more than a year. Whilst assessment of the groundwater level trends in these bores is ongoing, a summary of the assessment to date is summarised for each of these bores.

To date apparent generalised upward or downward trends that seem or are conclusively typical across the periods in which monitoring data has been collected have not been identified. Most trends appear to be seasonal, with seasonal (i.e. intra-annual) groundwater pressure variations being less than inter-annual variations.

A statistical methodology is being defined which can objectively define the meaningful threshold values against which the significance of groundwater pressure variations can be assessed against baseline water pressures. It is predicted that several years of data collection before baseline values and threshold trigger values for a change to groundwater pressures at an Early Warning Spring (EWS) can be objectively determined.

The following sections present a summary of the observed groundwater level trends data collected to date.

3.5.1 Yebna 2 Spring Complex

MW0902 and SBNGWP01 are EWS bores for the Yebna 2 EPBC spring complex. Groundwater pressure data for these bores is displayed graphically in Figure 3-1.

MW0902 has been monitoring the Precipice Sandstone since January 2011 and has shown a general upward trend in groundwater level since Q4 in 2012. The groundwater level has increased by approximately 1 metre (m) through 2015, therefore at a rate of approximately 1 m increase per year. The short-term variation of the longer term groundwater level trend (i.e. the short-term 'noise') has range of up to around 0.5 m. Since the beginning of 2017, the groundwater level has stabilised and trended slightly downward by about 0.5m through the last year.

SBNGWP01 has been monitoring the Precipice Sandstone since December 2014 and has shown a general upward trend in groundwater level since that time. The groundwater level has increased by approximately 1 metre (m) through 2015, therefore at a rate of approximately 1 m increase per year. In 2016 the groundwater level increased by approximately 0.5m. The upward trend seen in 2016 continued through the first half of 2017. The second half of 2017 saw a slightly decreasing water level trend of around 0.2m over around 6 months. In 2018 it decreased by a further 0.5m. The short-term variation of the longer term groundwater level trend (i.e. the short-term 'noise') has range of up to around 0.25 m.

The recent increase and decrease in groundwater pressures is related to an increase and subsequent decrease in injection rate into the Precipice Sandstone by the Australia Pacific LNG Project (Origin, 2018).

3.5.2 Abyss / Lucky Last Spring Complexes

MHTGWP01, MHTGWH01, MNHGWP02 and OKSGWP01 are EWS bores for the Abyss and Lucky Last EPBC spring complexes. Groundwater pressure data for these bores is displayed graphically in Figure 3-2, Figure 3-4 and Figure 3-4.

MHTGWP01 has been monitoring the Precipice Sandstone since December 2013, and is located more than 10 km west of any active gas field development. It generally shows a downward trend since April 2014, and a stable trend since August 2014. From 2014, groundwater pressures vary by up to around 0.1 m approximately monthly, and up to around 0.5 m over an approximately annual cycle.

MHTGWH01 has been monitoring the Hutton Sandstone since November 2014, and is located more than 10 km west of any active gas field development. It generally shows a stable trend since monitoring commenced. Throughout this period, groundwater pressures vary up to around 0.2m in approximately fortnightly cycles.

MNHGWP02 has been monitoring the Precipice Sandstone since August 2015, and is also located more than 10 km west of any active gas field development. It generally shows a stable trend since monitoring commenced up to the first quarter of 2017. Groundwater pressures vary by up to around 0.3 m over fortnightly cycles. Since the start of 2018 groundwater pressures have declined by about 0.4m.

OKSGWP01 has been monitoring the Precipice Sandstone since mid-December 2016. The monitoring bore is located approximately 3km west of active CSG wells, on the unconformable contact zone between the Precipice Sandstone and the underlying Bandanna Formation. Initial data over the first 6 months show an exponential decay pattern of declining groundwater level. Groundwater levels in the bore for the remainder of 2017 and into the first half of 2018 show a water level decline of about 0.5 m/year. The initial exponential decay pattern suggests the monitoring bore is poorly connected to the Precipice Sandstone, and that the bore was initially over pressurised with drilling/workover fluids and is slowly returning to ambient groundwater pressure. This was verified in June 2018, which is indicated by a pressure spike as a slug test was performed. As a result, the bore was worked over in February 2019 to improve the connectivity of the monitoring with the adjacent formation.

3.5.3 Cockatoo Creek Spring Complexes

AVLGWH01, AVLVWH1, AVLVWH2, AVLVWP1 and AVLVWP2 are EWS bores for the Cockatoo Creek Spring Complex. Groundwater pressure data for these bores is displayed graphically in Figure 3-5.

3.5.3.1 AVLGWH01

AVLGWH01 has been monitoring the Hutton Sandstone since January 2013, and is located more than 30 km north of Santos GLNG gas field development areas. AVLGWH01 is a landholder bore that is understood to remain in operation as an active extraction bore.

The observed groundwater pressures in the bore generally show a downward trend since the record began in January 2013. Throughout 2013 the rate of decline was approximately 0.2 m/year, in 2014 the rate of decline was approximately 0.7 m/year and appears to be related to a period of intense extraction from the bore. Since 2015, extraction appears to have ceased, and groundwater levels stabilised and have trended upward at a rate of about 0.5 m/year, stabilising at levels last seen in 2012.

3.5.3.2 AVLVWH1/AVLVWH2

AVLVWH1 and AVLVWH2 are monitoring points located within the same Vibrating Wire Piezometer (VWP) monitoring location. There is no Santos GLNG gas field development area in close proximity to this location. The two monitoring points are monitoring different depths in the Hutton Sandstone, with H1 being at 155 mbgl and H2 at 250 mbgl. The deeper monitoring point is stratigraphically closer to the Bandanna Formation, which is the formation targeted by CSG wells operated by Santos which are

closest the monitoring location. The site went down in Q3 2017 and was being investigated for rectification throughout the following year. The site came back online at the end of 2018.

The VWP has been monitoring the Hutton Sandstone since December 2012. The two monitoring depths show different groundwater level trends.

- H1 (the shallowest) shows a general downward trend in groundwater level since records began. The groundwater level has decreased by approximately 5 m from December 2012 to May 2014. Since May 2014, water levels appeared to have stabilised at approximately 247 mAHD, and increased from around May 2015. Throughout 2016, groundwater pressures decline by around a metre. This pattern continues throughout 2017. Groundwater levels vary around the longer term average water level by up to around 4 m. By the time the sensor comes back online at the end on 2018, the groundwater level trend appears to have stabilised for AVLVWH1.
- H2 (the deeper) shows a period of increasing groundwater levels from December 2012 to June 2013 (13 m increase), prior to demonstrating a period of decline from June 2013 to April 2015 (~13m). It fluctuates heavily throughout the remainder of 2015 though appears to be trending upward. 2016 shows a general decline of around 3 m that appears to stabilise in the final quarter. This stable trend is generally reflected throughout 2017, albeit the data does fluctuate by around 5m over less than monthly cycles. By the time the sensor comes back online at the end on 2018, the groundwater level appears to be trending downward by about 2.5 m/year. This cannot be a result of CSG activity, since the intervening aquifer (the Precipice Sandstone) does not show worse declining level trends. The downward pressure trend is likely due to local and regional abstraction by other groundwater users in the same formation.

3.5.3.3 *AVLVWP1/AVLVWP2*

AVLVWP1 and AVLWP2 are monitoring points located within the same VWP monitoring location. The two monitoring points are monitoring different depths in the Precipice Sandstone, with P1 being at 490 mbgl and P2 at 528 mbgl. The deeper monitoring point is stratigraphically closer to the Bandanna Formation, which is the formation targeted by CSG wells operated by Santos which are closest the monitoring location. The site went down in Q3 2017 and was being investigated for rectification throughout the following year. The site came back online at the end of 2018.

The VWP has been monitoring the Precipice Sandstone since December 2012. The two monitoring depths show different groundwater level trends.

- P1 (the shallowest) shows a general upward trend in groundwater levels, with a decline in 2015, and general increase throughout 2016 and 2017. The groundwater level has increased by approximately 12 m from December 2012 to December 2014, approximately 6 m/year. In August 2015, groundwater levels dropped rapidly by around 15 m and appear broadly stable throughout the rest of 2015. In 2016 groundwater levels increased by around 5 m. In 2017, groundwater levels jumped another 25 metres. Within any single year, the groundwater level may vary by up to around 10 m around longer term trends. By the time the sensor comes back online at the end on 2018, the groundwater level trend is sharply downward trending but is not lower than recorded in 2012-2016.
- P2 (the deeper) shows a period of decreasing but stabilising groundwater levels from December 2012 to December 2016. Over this period the water level decreased by approximately 3.5 m/year. Throughout 2016 groundwater pressures increased by around a metre and were stable throughout 2017. Within any single year, the groundwater level may vary by up to around 1 m around longer term trends. By the time the sensor comes back online at the end on 2018, the groundwater level trend appears to have trended slightly downward, but appears somewhat stable. More data is required to confirm if this is a genuine declining trend.

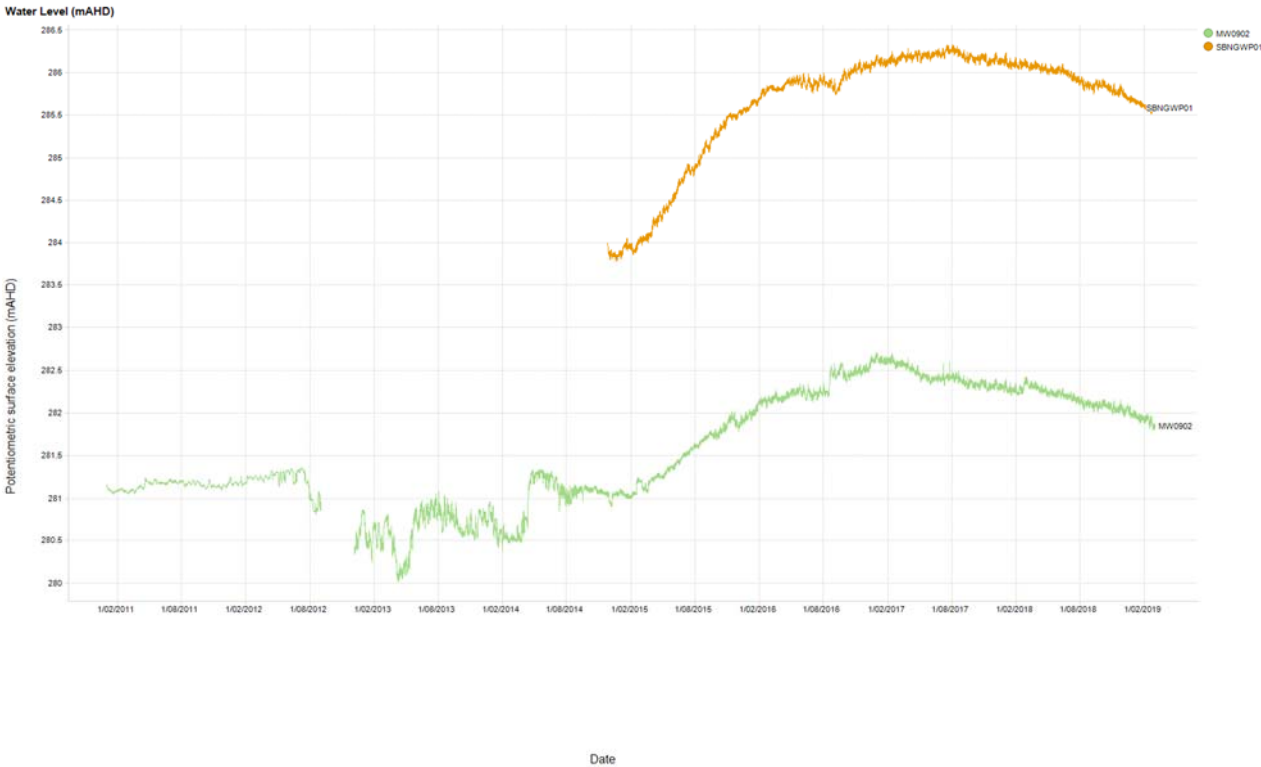


Figure 3-1: Yebna 2 EWS Groundwater Pressure Data at MW0902 and SBNGWP01

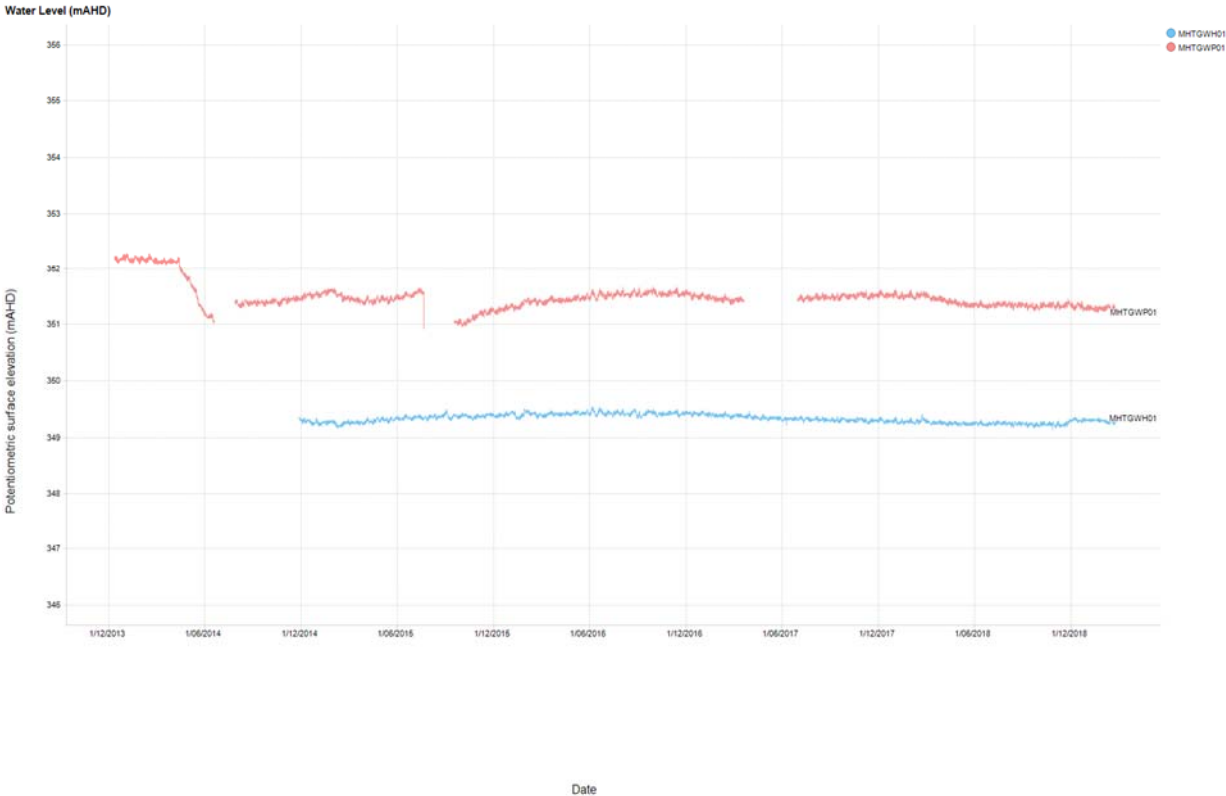


Figure 3-2: Abyss and Lucky Last EWS Groundwater Pressure Data at MHTGWP01 and MHTGWH01

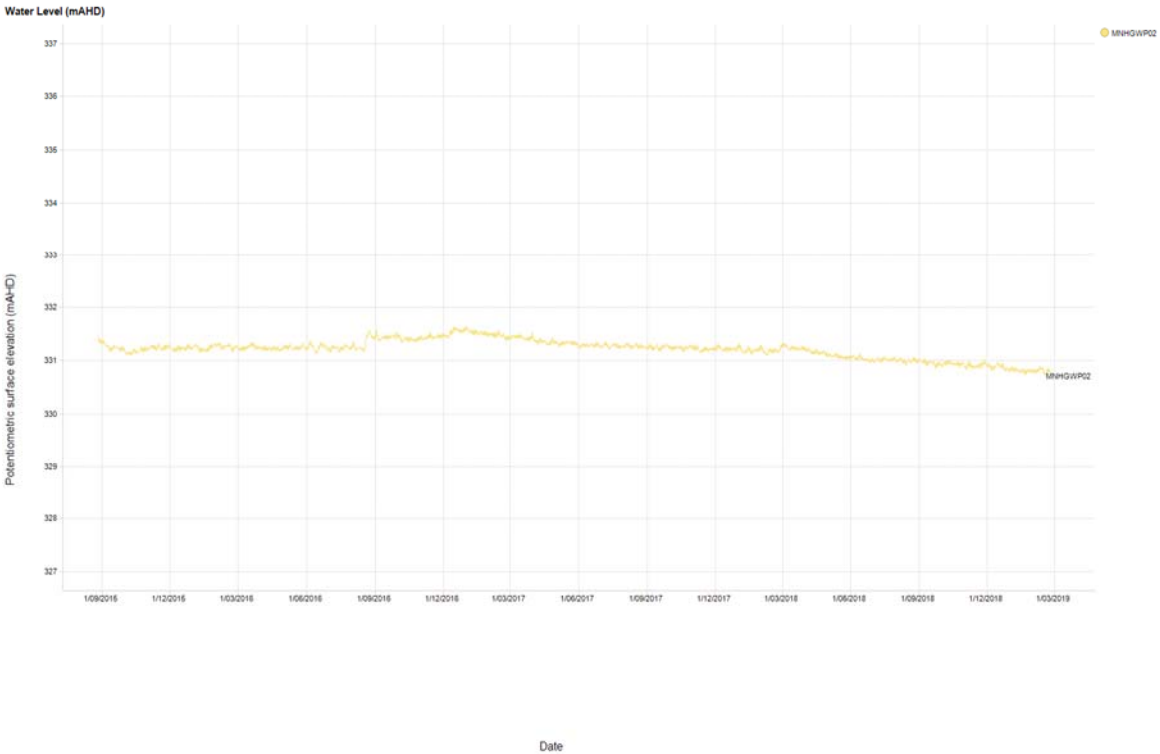


Figure 3-3: Abyss and Lucky Last EWS Groundwater Pressure Data at MNHGWP02

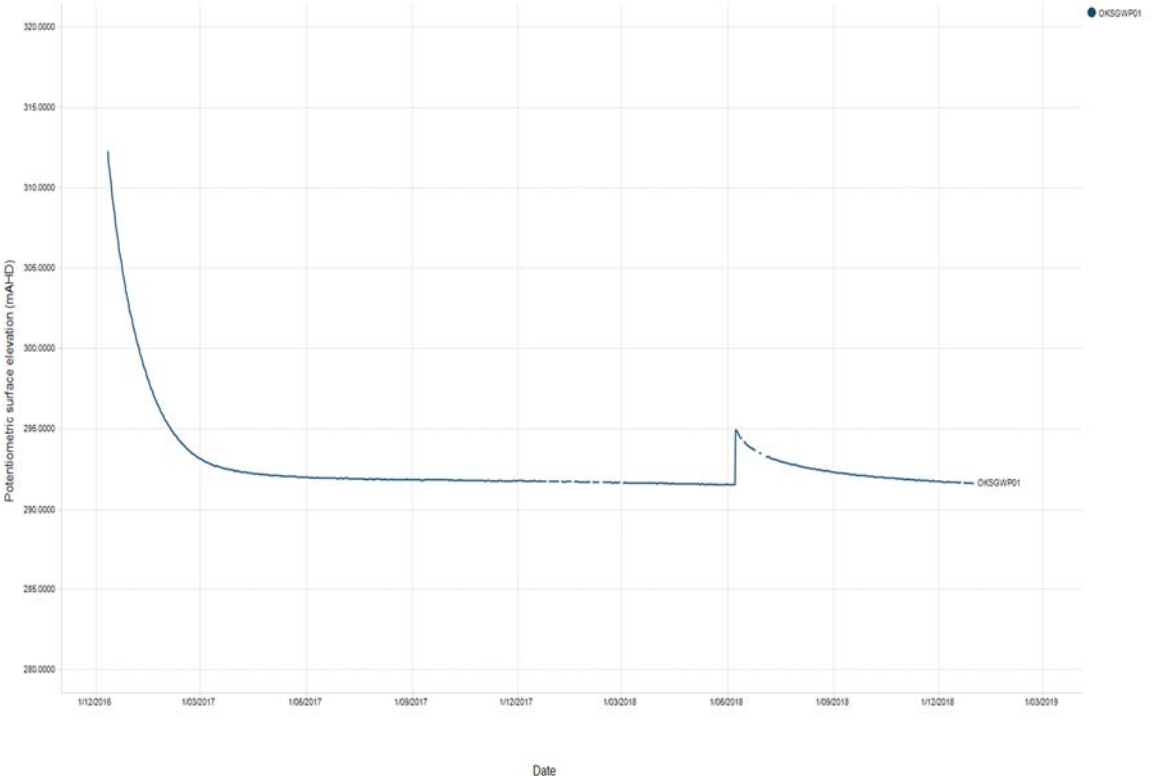


Figure 3-4: Abyss and Lucky Last EWS Groundwater Pressure Data at OKSGWP01

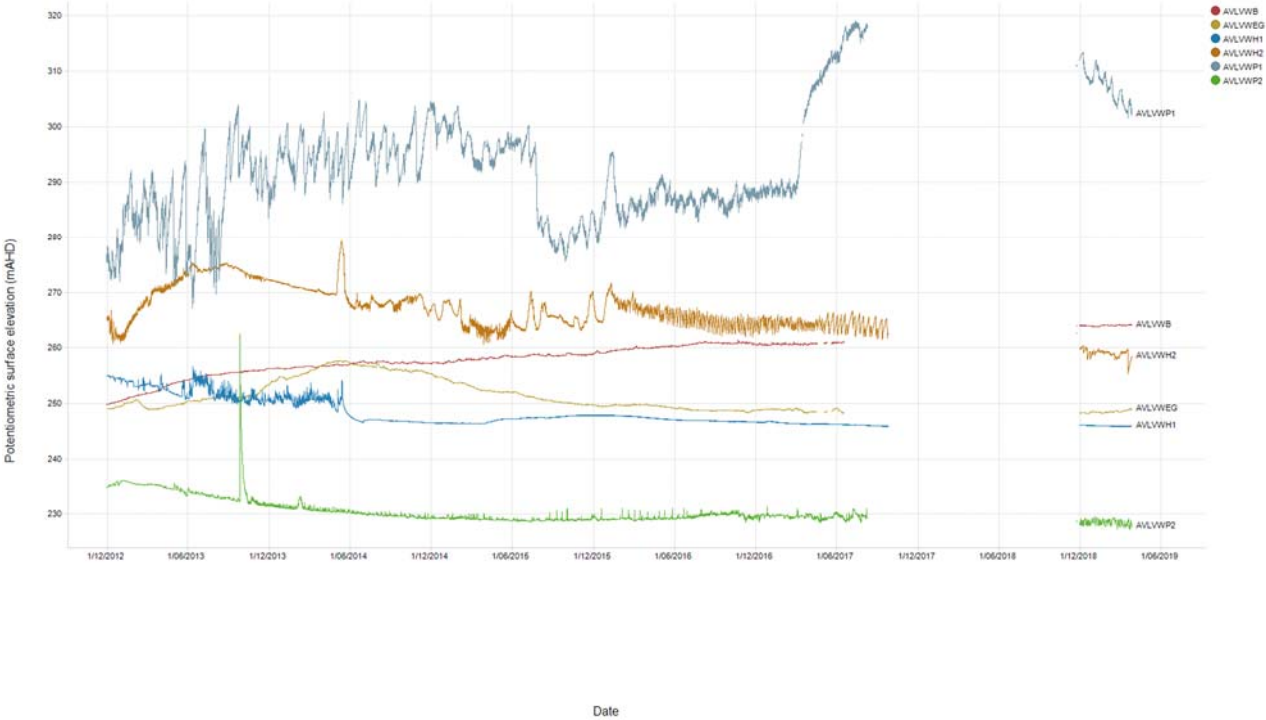


Figure 3-5: Cockatoo Creek Spring Complex EWS Groundwater Pressure Data

4.0 Aquifer Connectivity

4.1 Overview

In accordance with approval conditions Santos GLNG has undertaken its own primary data collection and interpretation related to aquifer connectivity. Santos GLNG has also provided data to various work programs being undertaken by State and Federal Government departments, including the OGIA, Commonwealth Scientific and Industrial Research Organisation (CSIRO) and the Office of Water Science.

Santos GLNG activities and results to October 2013 were reported in the Stage 2 CWMMP Rev 2. No major updates have occurred since the submission of the Stage 2 CWMMP Rev 2. The forward work program is outlined in the following sections.

4.2 Coal Seam Water Monitoring and Management Plan Commitments

Table 4-1 provides an outline of Santos GLNG's commitments presented in the Stage 2 CWMMP Rev 2, specific to aquifer connectivity and progress against each commitment.

Table 4-1: Stage 2 CWMMP Rev 2 Commitments – Aquifer Connectivity

Condition	Commitment	Target Completion Date Specified in the Stage 2 CWMMP Rev 2	Status
49b, 53b, 53d(i)4)	Santos GLNG committed to provide further characterisation on the level of connectivity between the formations. Most of the studies, at this stage, are ongoing and not yet conclusive. Note that the results, where available, will be presented in future updates to the CWMMP.		
	Multi-level monitoring bores.	Ongoing monitoring and data assessment.	Completion of monitoring bores in 2016, ongoing data collection took place in 2016.
	Contact Zone Program.	Ongoing after installation.	Contact zone monitoring well installed in 2016.
	Wallumbilla Fault Program.	Installation planned for 2014.	Complete. Additional monitoring data not feasible.
	Aquifer response to CSG depressurisation.	Ongoing.	Ongoing.
	Isotope and geochemical signature.	Ongoing.	Ongoing.
	Pumping response observations and assessments.	Annually from 2014.	Ongoing.
	The outcomes of the conventional oil and gas well and water bore risk assessment will be presented in an update to the CWMMP.	2014.	Ongoing.

4.3 Multi-level monitoring

The Santos GLNG monitoring network includes multi-level piezometers and nested single-zone groundwater level monitoring bores. These piezometers target aquifers and specific monitoring zone depths to pre-defined data acquisition objectives. The number of multi-level monitoring locations is summarised in the Table 4-2.

Table 4-2: Number of Active Multi-level Groundwater Level Monitoring Installations

Gas Field	Number of Active, Multi-level Installations or Nested Bore Sites
Roma	19
Fairview	2
Scotia	2

Multi-level monitoring data will continue to be collected, such data are provided to the OGIA.

4.4 Contact Zone near the Fairview Field

Erosion of the Rewan Formation in the south western corner of Fairview prior to deposition of the Precipice Sandstone has resulted in an unconformity where the Precipice Sandstone directly overlies the Bandanna Formation. This area is referred to as a contact zone. The contact zone does not underlie an area that is proposed to be an operational gas field for the Bandanna Formation. The nearest potentially producing gas well in the Bandanna Formation is located approximately 3 km from the contact zone.

Since the initial definition of this study program, the location and extent of the contact zone in Fairview has been reviewed using more recently acquired geological data. This has reduced the size of the contact zone.

The project plan was to investigate the geological stratigraphy and monitor the contact zone through the construction of a number of groundwater monitoring bores as defined in Table 4-3. Two vibrating wire piezometers were installed in 2009 (VWP0902 and VWP0903), and one monitoring bore was installed in 2013 (QWC129, also referred to as MTGWP01 or the Mount Hutton bore). Given the revised location of the contact zone, the Mount Hutton bore, VW0902 and VW0903 are no longer interpreted to be in the contact zone. The closest monitoring point is VW0902 which is expected to be less than 400 m from the contact zone.

Santos GLNG drilled OKSGWP01 in 2016. The data does not suggest there is not a discernible downward trend in groundwater pressures in the Precipice related to the proximity of the contact zone.

Table 4-3: Status of Groundwater Level Monitoring Installations Investigating the Contact Zone in Fairview

Bore name	Monitored Formation	Status
VW0902	Precipice Sandstone	Completed
VW0903	Precipice Sandstone	Completed
OKSGWP01	Precipice Sandstone	Completed
"Contact zone"	Hutton Sandstone	Completed - Hutton not present.
QWC 129 – Mount Hutton	Precipice Sandstone	Completed
	Hutton Sandstone	Completed
Spring Gully – PB1	Precipice Sandstone	Completed
	Hutton Sandstone	Not completed*

*Proposed bore location is to be delivered by APLNG as it is on their tenure, drilling and completion schedule not known.

4.5 Hutton-Wallumbilla Fault

The Hutton-Wallumbilla Fault (also called the Wallumbilla Fault) is defined as a complex faulting system. The fault system consists of a main fault to which are associated a number of secondary significant faults. The fault system spreads in width of approximately two kilometres. The main fault is not a straight box offset fault type and its characteristics vary along the fault profile. The main fault offset can be made of a number of offsets with varying displacements. The amplitude of the displacement varies from a few metres to the south to about 50 m to the north of the Roma field.

The fracturing and the displacement do not affect the full stratigraphic profile. The main faulting occurred during a compressive phase of mid-Triassic. The faults were reactivated during the mid-cretaceous causing minor faulting throughout the Secondary sequences or causing folding. Fractures affecting the Secondary could also result from differential sediments compaction and as such be tension fractures.

Using the Boxgrove Ironstone Member (a reliable geophysical/seismic marker) at the top of the Boxvale Sandstone, seismic sections show that the formations above the Evergreen Formation are continuous across the fault. Therefore it is now interpreted that the coal beds of the Walloon Coal Measures and all the aquifers above them are continuous across the fault zone.

Beneath the Walloon Coal Measure, the Precipice Sandstone would have been deposited, over the structure prior to the significant displacement and therefore is hydrogeologically a non-continuous structure across the Roma Shelf. The displacement of the Precipice Sandstone appears to be over 50 m, whereas the Precipice Sandstone at this location is not more than 25 m thick. Besides discontinuity, lateral permeability is limited by lithology with the Precipice Sandstone comprising well cemented fine-grained sands, less typical of the highly permeable, coarse sandstone depositions of Precipice Sandstone observed in other areas of the Surat Basin, away from the Roma Shelf.

In terms of its hydraulic properties, the Hutton-Wallumbilla Fault is not necessarily considered to be a barrier to horizontal flow through aquifers that are younger than the Evergreen Formation. Conversely, lateral extent and integrity of lower permeability aquitards layers above the Evergreen Formation are also considered to be continuous, and as such provide a continuous throttle to vertical pressure propagation and fluid flow. As such, the fault is not expected to play a major role in controlling drawdown resulting from coal seam depressurisation neither vertically (i.e. between formations) and horizontally (i.e. across formations).

A hydrogeochemistry review was undertaken of bore water chemistries around the Hutton-Wallumbilla Fault in the Roma field to understand whether this data might elude to the presence of vertical flow and connectivity pathways between the shallow (above coal) water bearing formations of the Bungil, Mooga, Orallo and Gubberamunda sandstones. The review concluded that the water chemistry data that had been obtained as part of the regional bore inventory and baseline assessment program did not provide a clear indication of the impact that the Hutton-Wallumbilla Fault may have on vertical and lateral connectivity of shallow aquifers.

4.6 Aquifer Response to Depressurisation

The intention of this program is to continue to monitor aquifer groundwater levels, to periodically review the measured values and to share the data with regulating authorities as they request it.

To date there has been no discernible response to aquifer groundwater levels in aquifers in response to CSG development.

4.7 Isotope and Geochemical Signature

Baseline isotope and geochemistry data will continue to be collected from regional groundwater monitoring bores, as required and stipulated by various regulatory drivers which require it. All data is supplied to the regulating authorities as required.

4.8 Pumping Response to Depressurisation

Measurement of groundwater pressures throughout the life of the project will provide evidence of drawdown effects that may be due to depressurisation of gas bearing formations. The ongoing groundwater pressure monitoring program will include the regional groundwater pressure monitoring as stipulated by the UWIR, as in compliance with the *Water Act 2000* (Qld), and as required by other impact assessments such as spring impact monitoring in accordance with the JIP.

4.9 Support of OGIA Research

Future programs of work will focus on supporting the hydraulic connectivity work programs that are identified and implemented by the OGIA. The findings of these research programs are reported by the OGIA annually and are being carried out in collaboration with CSIRO, Geoscience Australia, universities, other research institutions and petroleum tenure holders.

The OGIA manages and interprets a number of hydraulic connectivity investigations across the Surat CMA. The OGIA directly manages some investigations directly, but is also the principal stakeholder of research being undertaken by others parties such as the Queensland Herbarium, University of Queensland Centre for Coal Seam Gas, Geoscience Australia, the Geological Survey of Queensland, Gas Industry Social and Economic Research Alliance (GISERA), and Queensland University of Technology.

Current research themes that are being considered for inclusion in the next UWIR include geology, hydrogeology, groundwater flow modelling and springs. Specific research topics under each of these themes are developed or advocated by OGIA where they are deemed to improve certainty of model prediction and management outcome. More detail about specific research topic under each of the major themes is usually provided on OGIA's website, which may be periodically updated as research themes develop.

In addition to specific studies, the OGIA use monitoring data to verify conceptual understanding of hydraulic connectivity. The OGIA reviews the adequacy of the groundwater model at least every years (annual review) for example. Such reviews compare monitoring data with predicted changes to the groundwater regime that have been modelled. This is a statutory roles of the OGIA that is required to prepare and maintain a UWIR.

As an example, monitoring data may provide evidence that the location of connecting geological structures such as faults and unconformities that connect two or more hydrogeological units needs to be re-assessed. In this way, the OGIA's evaluation of the monitoring data forms a fundamental process for verifying the degree of hydraulic connectivity that is assumed by the groundwater model now and into the future.

5.0 Managed Aquifer Recharge

5.1 Overview

Managed aquifer recharge (MAR) is the purposeful recharge (or injection) of water to aquifers for subsequent recovery. In the case of the proposed Santos GLNG MAR trial in Roma, the injected water comprises treated coal seam water.

This section provides an update on the water monitoring and management strategies that Santos GLNG proposes to implement for the MAR trial. This reiterates the work that has been completed to date, and provides an update to the development schedule that was outlined in the Stage 2 CWMMP Rev 2.

5.2 Coal Seam Water Monitoring and Management Plan Commitments

Table 5-1 provides an outline of Santos GLNG's commitments presented in the Stage 2 CWMMP Rev 2, specific to MAR and progress against each commitment.

Table 5-1: Stage 2 CWMMP Rev 2 Commitments – MAR

Condition	Commitment	Target Completion Date Specified in the Stage 2 CWMMP Rev 2	Status
49c, 53a, 53d)ii	Santos GLNG has developed a MAR pilot program and schedule for gas field piloting of aquifer reinjection:		
	Fairview CSG Field Stage 1– Desktop Study.	Completed March 2012.	Completed March 2012.
	Roma CSG Field Stage 1– Desktop Study.	Completed January 2011.	Completed January 2011.
	Roma CSG Field Stage 2 – Investigations and Assessment.	Completed January 2011.	Completed January 2011.
	Roma CSG Field pilot trial (Hermitage) Stage 3 – Construction and Commissioning.	Completed in Q1/Q2 2012.	Completed Q1/Q2 2012.
	Roma CSG Field pilot trial (Hermitage) Stage 4 – Operation.	Completed Q4 2012.	Completed Q4 2012.
	Roma CSG Field Trial (The Bend) Stage 3 – Construction and Commissioning.	Due for completion Q3 2014.	Determined as not technically feasible.
	Roma CSG Field Trial (The Bend) Stage 4 – Operation.	Due to commence Q3/Q4 2014.	Determined to not be technically feasible.
	Arcadia CSG Field Stage 1 – Desktop Study.	Completed September 2013.	Completed September 2013.
	All approved Injection Management Plans will be provided in an update to the CWMMP.	Ongoing.	Ongoing.



5.3 Status of Feasibility and Regulatory Approval

Santos GLNG is assessing the feasibility of implementation of MAR within the Roma field at the location of water treatment and gas compressor station Roma Hub Compressor Station 2 (HCS-02).

MAR in Roma would comprise injection of treated water via a number of injection wells, as few as four and as many as 12 injection wells may be used. The number of wells will depend upon the total volume of water produced by Santos GLNG activities and the injection rate that can be achieved at each well; less the demands for coal seam water from the portfolio of alternative beneficial re-use requirements such as construction, dust suppression and irrigation.

An application to the Queensland Government was sought to amend Environmental Authority (EA) conditions to permit the operation of MAR in the Roma field. This amendment was approved in 2014 following the submission including an Injection Management Plan (IMP) in support of the amendment application.

The IMP adopts a risk management framework consistent with the "National Water Quality Management Strategy, Australian Guidelines for Water Recycling Managing Health and Environmental Risks (Phase 2), Managed Aquifer Recharge". The finalised IMP that was submitted to DEHP on 15 January 2014 was provided in the 2013 CWMMP Annual Report (Santos GLNG, 2014).

MAR is not being pursued as a technically feasible long-term water management solution in Roma.

6.0 Hydraulic Fracturing

6.1 Overview

Hydraulic fracturing is employed in the petroleum industry to improve the production efficiency wells (i.e. more efficient and more economical extraction of gas from the coal seams). Hydraulic fracturing is not carried out on all wells as the process is only necessary at locations with lower permeability.

Hydraulic fracturing is carried out as one of the last activities in the construction of a well and prior to bringing the well into service. It is typically performed on newly drilled and constructed wells after the final well casing pipe has been inserted and the bore annulus cemented and after the casing has been perforated (i.e. the well is opened to access specific coal seams).

Hydraulic fracturing uses a mix of water, sand and minor concentrations of specific additives mixed on the surface and then injected down into the well and then through the perforations into the coal seam. The water and sand are typically comprise up to around 99% of the volumes of the hydraulic fracturing fluids, the remainder being specific chemical additives used to disinfect the water, prevent corrosion and adjust the properties of the fluid.

The hydraulic fracturing process occurs under varying positive high hydraulic pressures (ranging from approximately 7,000 to 34,500 KPa) in order to open existing fractures in the coal matrix. A proppant (such as sand) is then placed to hold open the fractures. The hydraulic fracturing fluids are injected through the perforations in the steel well casing pipe via wellhead works on the surface and coil-tube pipe down to a device which isolates the coal seam to be fractured.

After completion of the stimulation, the well can be put into production. The initial produced fluids (often referred to "flow-back") largely comprises the water used in the hydraulic fracturing fluid mixture, degraded additives as well as coal seam water and other geo-genic constituents sourced from the target formation.

6.2 Coal Seam Water Monitoring and Management Plan Commitments

Table 6-1 provides an outline of Santos GLNG's commitments presented in the Stage 2 CWMMP Rev 2, specific to hydraulic fracturing and progress against conditions.

Table 6-1: Stage 2 CWMMP Rev 2 Commitments – Hydraulic Fracturing

Condition	Commitment	Target Completion Date Specified in Stage 2 CWMMP Rev 2	Status
49e	Santos GLNG will provide a projection of the anticipated number of wells to be hydraulically stimulated during each year (up to and including 2016) as well as the number of hydraulic stimulations completed in the preceding year. Additional details to be reported will also include location information and the depth of each respective hydraulic stimulation.	Annually.	Complete Provided in Table 6.2 of this Annual Report.
49f	Santos GLNG has agreed with the Department of the Environment to undertake additional Direct Toxicity Assessment that will include:	December 2013.	Completed Q4 2016.



Condition	Commitment	Target Completion Date Specified in Stage 2 CWMMP Rev 2	Status
	<ul style="list-style-type: none"> • an ecotoxicological program, involving, for example, a comparison of (i) coal seam water, (ii) coal seam water with fracking chemicals, and (iii) fracking chemicals in freshwater; • assessing the risk of individual fracking chemicals of concern; and • assessing contribution of fracking chemicals to toxicity of fracking fluids and flow-back waters (mixture toxicity). <p>Santos GLNG provided the Department the joint industry Ecotoxicity Work Program results during 2018.</p>		

6.3 Hydraulic Fracturing in 2018

As of December 2018, 44 wells within the Santos GLNG tenures had been hydraulically fractured in 2018. A total of 141 hydraulic fracturing events/stages were completed within these wells. The location and depth of the hydraulic fracturing stages are presented in Table 6-2.

Table 6-2: Hydraulic Fracturing Locations and Perforation Details Completed in 2018

WELL CODE	Top of Perforation (mbgl)	Bottom of Perforation (mbgl)	Latitude (WGS84)	Longitude (WGS84)
FV10-35-21	1348.38	1386.11	-25.673497	148.908792
FV10-35-22	1366.28	1422.28	-25.673422	148.908775
FV10-36-21	1359.38	1393.27	-25.672381	148.916625
FV10-38-21	1364.38	1453.08	-25.676333	148.915244
FV10-39-21	1379.48	1486.64	-25.678047	148.911297
FV10-40-21	1362.93	1412.83	-25.681961	148.913572
FV10-42-21	1436.98	1542.2	-25.686456	148.913036
FV10-43-21	1346.68	1414.87	-25.688931	148.916931
FV11-49-21	1271.48	1277.84	-25.691544	148.949061
FV11-69-21	1396.78	1456.34	-25.677831	148.919572
FV11-70-21	1418.18	1425.9	-25.678069	148.925384
FV11-71-21	1412.68	1524.93	-25.686392	148.921225
FV11-73-21	1410.88	1462.57	-25.691350	148.921194
FV11-75-21	1311.18	1319.08	-25.690828	148.937953
FV11-75-22	1234.16	1243.08	-25.690756	148.937928
FV11-77-21	1261.48	1273.94	-25.694492	148.937072
FV12-22-4	1414.28	1626.69	-25.730239	149.076339
FV12-37-1	1512.08	1673.02	-25.734805	149.074494
FV12-37-2	1517.98	1689.88	-25.734877	149.074526
FV12-38-1	1461.18	1567.03	-25.737686	149.073100
FV12-39-1	1387.48	1524	-25.739458	149.080486
FV12-40-1	1384.38	1548.35	-25.741561	149.078647
FV12-41-1	718.38	842.65	-25.744042	149.071775
FV12-42-1	1460.38	1503.2	-25.744603	149.078711
FV12-43-1	1351.88	1469.14	-25.747942	149.075500
FV13-28-1	1428.88	1585.48	-25.737050	149.087211
FV13-29-1	1522.68	1605.2	-25.744256	149.085253
FV18-61-1	808.08	858.08	-25.820892	149.147717
Tarcoola Station 10	552.65	612.75	-25.457031	148.910100
Tarcoola Station 11	585.4	645.6	-25.456431	148.913681
Tarcoola Station 12	531.3	590.4	-25.464083	148.909261
Tarcoola Station 13	553.95	617.45	-25.460578	148.911222
Tarcoola Station 14	591.35	652.45	-25.459906	148.915064
Tarcoola Station 15	615	676.3	-25.457236	148.917789
Tarcoola Station 16	586.3	642.1	-25.463378	148.914228
Tarcoola Station 17	619.5	677.3	-25.461492	148.918764
Tarcoola Station 6	515.65	576.35	-25.455878	148.906558
Tarcoola Station 7	560.35	619.45	-25.453886	148.910872
Tarcoola Station 8	602.55	660.05	-25.453269	148.915744
Tarcoola Station 9	516.55	578.65	-25.460167	148.907389
Yebna South 1	813.20	888.82	-25.771805	149.119350

mbgl – metres below ground level



6.4 Direct Toxicity Assessment

As detailed in the Stage 2 CWMMP Rev 2, Santos GLNG committed to undertake additional Direct Toxicity Assessments as part of the joint Industry Working Group (IWG) CSG Fracturing Fluid Ecotoxicology Work Plan (Hydrobiology, June 2013). The Ecotoxicology Work Plan, prepared by Hydrobiology and approved by the former Department of Sustainability, Environment, Water, Population and Communities (now DOTE) and the Expert Panel for major coal seam gas projects, was developed to assess the incremental toxicity of fracturing fluids in the context of the natural ecotoxicity of coal seam gas water to surface water organisms.

The direct toxicity assessment for various waters and fluids commenced in December 2015, this involves testing representative coal seam waters from wells to be fractured and testing the hydraulic fracturing fluid and coal seam water as formulated for injection. The assessment report was provided to the Department in 2018.

7.0 Surface Water Monitoring

7.1 Overview

The Fairview and Arcadia Valley fields are located within the Fitzroy Basin, whilst the Roma field is located in Condamine – Balonne Catchment. The main water systems within the Fairview field are the Dawson River and its tributaries Baffle Creek and Hutton Creek. There are five creeks running through the Roma field which drain south to the Balonne River, including Dargal Creek, Bungil Creek, Blyth Creek, Wallumbilla Creek, and Yuleba Creek. All watercourses are highly ephemeral. The Arcadia Valley field lies within both the Comet River and Dawson River catchments, where the surface water network is largely limited to ephemeral streams except the Upper Dawson which is weekly perennial.

Santos GLNG has established surface water monitoring programs for springs, treated coal seam water discharge points and ephemeral streams.

7.2 Coal Seam Water Monitoring and Management Plan Commitments

Table 7-1 provides an outline of the commitments made in the Stage 2 CWMMMP Rev 2, specific to surface water monitoring and progress against each commitment.

Table 7-1: Stage 2 CWMMMP Rev 2 Commitments – Surface Water Monitoring

Condition	Commitment	Target Completion Date Specified in Stage 2 CWMMMP Rev 2	Status
49.g.vi)	Surface Water Threshold Values		
	Collection and reviewing 2 years of baseline data and development of upper and lower confidence levels (Threshold values) for key parameters (relevant to MNES).	End of 2014.	Completed.

7.2.1 Surface Water Threshold Values

As summarised in Section 2, baseline threshold values for surface water have been established. This is reported in “Baseline Threshold Values for Surface Water Quality in Fairview and Roma Project Areas”, dated February 2015. These threshold values will be reported in the next update to the CWMMMP.

8.0 Brine Management

8.1 Overview

Brine is defined as the concentrated reverse osmosis waste stream (RO concentrate). Once RO concentrate reaches above 40,000 mg/L total dissolved solids (TDS), it is then defined by DES as 'brine'. Santos GLNG has the following mechanisms currently in place for RO concentrate management:

- **Fairview field:** Santos GLNG stores and manages RO concentrate production in brine containment ponds.
- **Roma field:** Santos GLNG stores and manages RO concentrate production in brine containment ponds.
- **Arcadia Valley field:** No RO concentrate will be produced in Arcadia Valley field within the scope of the Santos GLNG Stage 2 CWMMP Rev 2.

Further brine management options or expansion of current options may be required as gas fields develop, Santos GLNG is currently assessing options for the long-term management of brine and solid salt.

8.2 Coal Seam Water Monitoring and Management Plan Commitments

Table 8-1 provides an outline of Santos GLNG's commitments presented in the Stage 2 CWMMP Rev 2, specific to brine management and progress against each commitment.

Table 8-1: Stage 2 CWMMP Rev 2 Commitments – Brine Management

Condition	Commitment	Target Completion Date Specified in Stage 2 CWMMP Rev 2	Status
49.g.x)	Brine Management Plans Provision of Brine Management Plans developed for Arcadia Valley, Roma and Fairview gas fields as a state government requirement within the respective gas field's EA's. These will be provided in an update to the CWMMP.	December 2014.	March 2020 Due to an extension granted by the state government (DES) for provision of Brine Management Plans to December 2019.

8.3 Brine Management Progress

As stated since the 2014 CWMMP Annual Report there continues a significant reduction in water volumes (approximately 30%-50%) then originally predicted in the CWMMP Rev 2, for the Roma and Fairview gas fields. This has therefore significantly reduced estimated brine production volumes.

During 2018, the focus on brine management studies included maximising beneficial use options for coal seam water that meets relevant standards, understanding and capitalising on these opportunities as priority will minimise brine and solid salt production.

The outcomes of brine and salt management feasibility assessments are ongoing; however, based on current sanctioned Development Projects, Santos GLNG has constructed sufficient storage capacity in the Fairview field for brine management for the project life. The Arcadia Valley field is not estimated to



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start production until Q3 2019 and therefore there will be no brine to manage during the scope of the Stage 2 CWMMP Rev 2.

Extension was previously granted by the state government (DEHP) for provision of Brine Management Plans for Roma field and Fairview and Arcadia Valley fields by December 2019.

9.0 Subsidence

9.1 Overview

Pressure reductions in the subsurface due to coal seam water production have the potential to cause subsidence within the coal seam and a risk of deformation at the ground surface. Santos GLNG is required by EPBC Act Approval Condition 65 to undertake:

- a) baseline and ongoing geodetic monitoring programs to quantify deformation at the land surface within the proponent’s tenures. This should link from the tenement scale to the wider region across which groundwater extraction activities are occurring as well as to any relevant regional program of monitoring;
- b) modelling to estimate the potential hydrological implications of the predicted surface and subsurface deformation; and
- c) methods for linking surface and sub-surface deformation arising from CSG activities.

Santos GLNG has developed a Subsidence Management Plan which defines the process for identifying a reportable subsidence occurrence. The Subsidence Management Plan was provided as an appendix to the Santos GLNG Stage 2 CWMMP Rev 2.

Santos GLNG is using InSAR (interferometric synthetic aperture radar) technology to detect ground movement and deformation across the entire extent of its fields.

9.2 Coal Seam Water Monitoring and Management Plan Commitments

Table 9-1 provides an outline of Santos GLNG’s commitments presented in the Stage 2 CWMMP Rev 2, specific to subsidence monitoring and progress against each commitment.

Table 9-1: Stage 2 CWMMP Rev 2 Commitments – Subsidence

Condition	Commitment	Target Completion Date Specified in the Stage 2 CWMMP Rev 2	Status
53.d.i.III	Subsidence		
	The Subsidence Management Plan provides a response plan into any exceedance of the defined subsidence trigger. The Subsidence Management Plan describes the monitoring undertaken to establish variation of ground level over time.	Completed.	Completed.
	Subsidence baseline.	Completed.	Completed.
	Monitoring through satellite measurements.	Ongoing.	Ongoing.



9.3 Findings to Date

Stage 1 of the monitoring program comprised collection and interpretation of baseline ground motion conditions across the Surat and Bowen basins where gas field development activity is expected to occur at some point in the future. The findings were used to inform the Subsidence Management Plan.

Stage 2 of the InSAR monitoring program commenced in July 2012. An Interim report on the Stage 2 InSAR monitoring program was submitted to the DOTE in November 2013 as per the commitment made in the Stage 2 CWMMP Rev 2 and described the interim findings of Stage 2 of the monitoring program. Stage 2 was completed in April 2015.

Stage 3 of the InSAR monitoring program commenced in April 2015. The first interim report for Stage 3 was provided to Santos in April 2016. Stage 3 occurred until February 2018. The next stage of monitoring was commissioned in 2017 provide continuous ground motion monitoring beyond February 2018.

Stage 3 of the InSAR monitoring program commenced in January 2018. The first interim report for Stage 3 was provided to Santos in June 2018, and the second in January 2019. Stage 4 is scheduled to continue until 2020.

To date, the results show a stable pattern over time for the whole Santos GLNG tenures. No direct correlation between ground deformation and exact locations of the gas activities is evident. The localised displacements measured over the Santos GLNG fields (accumulated values of up to 20 mm) are likely due to superficial processes. Such processes might include natural processes such as erosion, sediment deposition, and soil wetting/drying, as well as anthropogenic activity such as agricultural activities.

9.4 Ongoing Studies and Monitoring

InSAR image data acquisition will continue throughout the life of the project, as to committed in the Stage 2 CWMMP.

10.0 Reporting

10.1 Overview

This section will outline the reporting commitments made in the Stage 2 CWMMP Rev 2 and report on progress against each item.

10.2 Coal Seam Water Monitoring and Management Plan Commitments

Table 10-1 provides an outline of Santos GLNG's commitments presented in the Stage 2 CWMMP Rev 2, specific to reporting and progress against each commitment.

Table 10-1: Stage 2 CWMMP Rev 2 Commitments – Reporting

Condition	Commitment	Target Completion Date Specified in Stage 2 CWMMP Rev 2	Status
49i, 53c)ix)	Reporting		
	A Coal Seam Water Monitoring and Management Annual Report will be developed for each calendar year and submitted to DOTE within the first quarter of the following year.	Annually.	Complete.
	Digital data can be provided to DOTE on request.	Ongoing.	Ongoing.
	Santos GLNG will publish the following reports on the internet (via the Santos Water Portal): <ul style="list-style-type: none"> ▪ Coal Seam Water Monitoring and Management Annual Report; ▪ Link to the latest Surat Cumulative Management Area (CMA); and ▪ Underground Water Impact Report (UWIR). 	Annually	Complete.
	Santos GLNG will regularly publish data from the water monitoring network on the Santos Water Portal.	Ongoing.	Ongoing (last updated December 2018).
55	The next revision of the CWMMP is currently planned to be submitted to the DOTE 3 months prior to the first LNG cargo.	Report to be submitted 3 months prior to first LNG cargo	In progress.



10.3 2018 Reporting

10.3.1 CWMMP Annual Report

The first Annual Report was submitted to the DOTE on 31 March 2014. The 2013 Annual Report included progress updates from October 2013 to December 2013 which incorporated the 2013 period since submission of Stage 2 CWMMP Rev 2. The 2014 to 2017 Annual Reports were previously submitted and reported on progress during 2014, 2015, 2016 and 2017 respectively.

This 2018 Annual Report has been developed to provide progress against commitments from 1 January 2018 to 31 December 2018 and will be made available on the Santos Water Portal as required by Conditions 49 and 53 of the EPBC approval by the 31 March 2019.

10.3.2 Digital Data Requests

No digital data was requested by the DOEE during this reporting period.

10.3.3 Santos Water Portal

Updates to the water monitoring network were published on the Santos Water Portal, this included updated water level and water quality results for a range of groundwater bores and surface water monitoring locations. These were most recently updated in December 2018.

The Santos Water Portal can be accessed via <http://www.santoswaterportal.com.au/>.

10.3.4 Future Reporting

The forward work plan to meet reporting commitments is outlined below:

- Provision of digital data to the DOEE upon request;
- Updates to water monitoring network and data on the Santos Water Portal on a quarterly basis;
-
- Commencement of the Annual Report 2019 covering January 2019 to December 2019.



11.0 References

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