

Annual Compliance Report 2021-2022 Coniston/Novara Field
Development Project (EPBC 2011/5995)

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

Rev	Owner	Reviewer/s <i>Managerial/Technical/Site</i>	Approver
	Environment Adviser	Operations Superintendent	Manager – Oil Assets
0	Kurt Wiegele	Mitchell Sherston	Anthony Smith
	<i>Kwiegele</i>	<i>M. Sherston</i>	Anthony Smith <small>Digitally signed by Anthony Smith Date: 2022.05.03 09:42:35 +08'00'</small>

Any hard copy of this document, other than those identified above, are uncontrolled. Please refer to the Santos Offshore Business Document Management System for the latest revision.

Rev	Rev Date	Author / Editor	Amendment
0	02/05/2022	Glenn Creed	Issue for Approval for submission to Regulator

Contents

1.	Introduction	4
1.1	Overview	4
1.2	Terms, Definitions and Abbreviations	4
2.	Declaration of Accuracy	5
3.	Approved Action	6
3.1	Regulatory Context	6
3.2	Description of Activities	7
4.	Compliance Assessment	11
4.1	Compliance Evaluation	11
4.2	Compliance Designations	13
4.3	2021 - 2022 Compliance Summary	13

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 eighth annual compliance report for EPBC 2011/5995 and covers the period 3 February 2021 to 3 February 2022 (referred to herein as the '2021-2022 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
DAWE	Department of Agriculture Water and Environment (formerly Department of the Environment and Energy)
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	Environment Plan
FPSO	Floating, Production, Storage and Offloading
HSE	Health, Safety and Environment
IMT	Incident Management Team
NOPSEMA	National Offshore Petroleum Safety and Environmental Management Authority
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 Emergency Plan
OSCP	Oil Spill Contingency Plan
OSMP	Operational and Scientific Monitoring Program

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	Production Manager – Ningaloo Vision
Organisation	Santos WA Energy Limited (ABN 39 009 301 964)
Date	29 April 2022

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 2021 to 3 February 2022

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 of Coniston/Novara Field 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 May 2015.

Further information is available on Santos website:

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

3.2.2 Current Project Status

Remote Operated Vehicle (ROV) inspection on the Van Gogh, Coniston & Novara subsea assets in December 2020 identified collapsed sections on the 12" subsea production flexible flowlines between DC3 and DC2 on both the Coniston and Novara lines.

Both flowlines are considered not fit for service and have been isolated between DC3 and DC2. As such activities and production from Coniston and Novara fields has been suspended until remedial work is completed.

The Ningaloo Vision hub development review is currently underway to determine the business case for remediation of the flowlines.

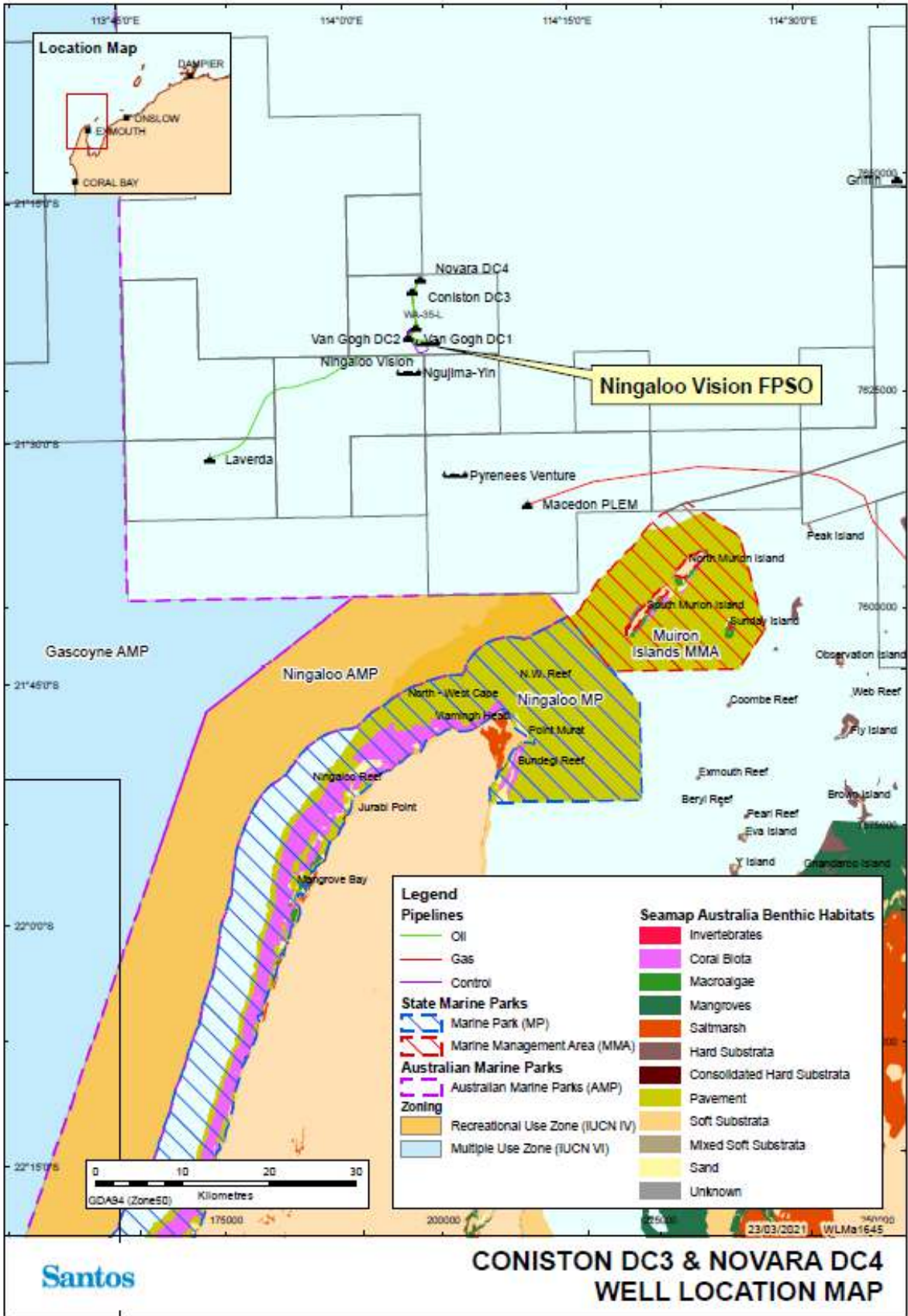


Figure 3-1: Coniston/Novara Field Location Map

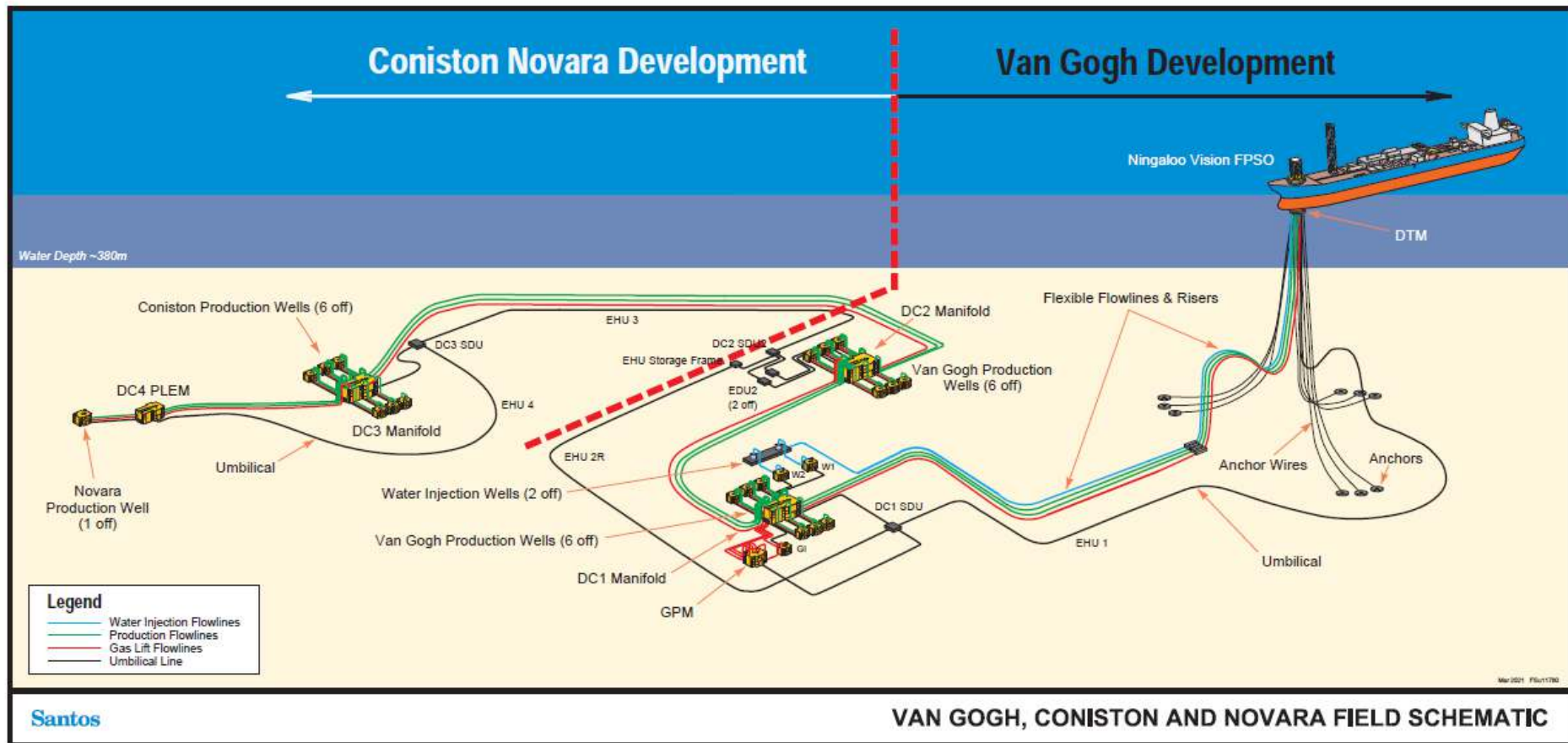


Figure 3-2: Schematic of the Coniston/Novara Development (including DC3 and DC4) and existing infrastructure of the Van Gogh Operation (including Ningaloo Vision FPSO, DC1 and DC2)

3.2.3 Activities Undertaken for the Coniston/Novara Development during the 2021-2022 Reporting Period

As both flowlines are not fit for service and are isolated between DC3 and DC2, there has been no production from Coniston and Novara fields during the reporting period.

The only vessel-based activities undertaken during the period was a ROV integrity inspection at DC3 / DC4 and pipeline from the Vessel the Vos Shine in March 2021.

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 2021-2022 reporting period. These sources of information are discussed in the following sub-sections.

4.1.1 Incident Response Exercises

Santos WA undertook two (2) routine Level 1 (small scale) spill exercise on the Ningaloo Vision FPSO during the 2021 – 2022 reporting period as part of the Annual Drill Schedule. These exercises were 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) are activated 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 members in spill response management. The last major spill exercise was held in November 2021 and was based on *Ningaloo Vision Operations Oil Pollution Emergency Plan (Van Gogh and Coniston-Novara Fields)* (TV-00-RI-00003.02) oil spill scenario.

Furthermore, Santos WA 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 December 2021. This equipment facilities would be potentially used in a response to a Ningaloo Vision (*Coniston-Novara Fields*) 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 2021-2022 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 Health, 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-00003.01) 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: Environmental Audits and Inspections Conducted during the 2021-2022 reporting period.

Date	Facility / Vessel	Audit / Inspection Type	Audit / Inspection Criteria
Monthly	NV FPSO	Monthly HSE Inspection Checklist	To assess compliance against various HSE requirements including specific criteria related to the accepted NV EP.
May 2021	NV FPSO	Q1 and Q2, Ningaloo Vision Environment Plan Audit – 2021	The audit was completed within Santos Offices and assessed compliance with performance standards and compliance with specific elements to the EP. This audit did not identify any non-compliance against the EPBC conditions.
Dec 2021	NV FPSO	Q3 and Q4 - Ningaloo Vision Environment Plan Audit – 2021	The audit was conducted within Santos Offices and assessed compliance with performance standards and compliance with specific elements to the EP.
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 Inspections Conducted by Regulators

NOPSEMA undertook an inspection from 24-25 March 2021 which covered the following:

- Item 1: Emissions and Discharges Produced Formation Water (PFW) Discharge Management – confirmation of appropriate arrangements to manage including status of PFW discharge and implementation of controls, assumptions underpinning the PFW management plan outlined in EP and quality assurance associated with OIW discharge management.
- Item 2: Invasive marine species – confirmation of appropriate arrangements to manage IMS including IMS management, antifoulant system and ballast water management.
- Item 3: Emergency Response Testing – verify that arrangements in place for ensuring appropriate and regular spill response (OSR) exercise / testing of Santos-owned OSR equipment and employed OSR personnel.

The inspection resulted in the three Opportunities for Improvement being issued to Santos for action and close out. Santos’ response to these recommendations were entered into the Santos Action Tracking Database for formal tracking and close out.

4.2 Compliance Designations

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

Table 4-2: Compliance Designations

Compliant	‘Compliance’ is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
Non-compliant	A designation of ‘non-compliance’ should be given where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
Not applicable	A designation of ‘not applicable’ should be given where the requirements of a condition or elements of a condition fall outside of the scope of the 2021-2022 reporting period. For example, a condition which applies to an activity that has not yet commenced.

4.3 2021 - 2022 Compliance Summary

Santos WA Energy’s compliance with EPBC 2011/5995 for the 2021-2022 reporting period can be summarised as follows:

- + Compliant: 8 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 2021-2022 reporting period.

Table 4-3: Compliance Summary for EPBC 2011/5995 Coniston/Novara Field Development Project for the 2021-2022 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 2021-2022 reporting period.</p> <p>Based on the above, Santos WA Energy considers that Condition 1 was not applicable during the 2021-2022 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 Operations Oil Pollution Emergency Plan (OPEP) required by EPBC 2011/5995 and Environment Plans required under OPGGS (E) Regulations.</p> <p>Environmental audits and inspections provide evidence of compliance with record keeping requirements, as well as implementation of environment plans and environmental performance more generally (Section 4.1). The corrective and preventative actions arising from these audits and inspections are managed using an online tracking system which includes assignment of responsibilities, timeframes, and status reporting and close-out records.</p> <p>Based on the above, Santos WA Energy considers that it was in compliance with Condition 2 during the 2021-2022 reporting year. It is also noted that the department has not exercised its right to undertake action under Section 458 of the EPBC Act during the 2021-2022 reporting year.</p>

<p>3</p>	<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. 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>	<p>Compliant</p>	<p>The approved action commenced on 03 February 2013; therefore, annual compliance reports for EPBC 2011/5995 must be published by 03 May each year.</p> <p>Santos WA Energy published its annual compliance report for EPBC 2011/5995 for 2021-2022 on 3 May 2021 available at:</p> <p>https://www.santos.com/about-us/corporate-governance/public-notice/</p> <p>Based on the above, Santos WA Energy considers that it was compliant with Condition 3 during the 2021-2022 reporting year.</p>
<p>4</p>	<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>	<p>Not Applicable</p>	<p>Activities during the 2021-2022 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 2021-2022 reporting period.</p> <p>Based on the above, Santos WA Energy considers that Condition 4 was not applicable during the 2021-2022 reporting year.</p>

<p>5</p>	<p>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.</p>	<p>Not Applicable</p>	<p>No requests were made to Santos WA Energy by the Minister to revise the plans or programs specified in conditions of EPBC 2011/5995 during the 2021-2022 reporting period.</p> <p>Based on the above, Santos WA Energy considers that Condition 5 was not applicable during the 2021-2022 reporting year.</p>
<p>6</p>	<p>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.</p>	<p>Not Applicable</p>	<p>The approved action substantially commenced on 03 February 2013. Therefore, this condition no longer applies.</p> <p>Based on the above, Santos WA Energy considers that Condition 6 was not applicable during the 2021-2022 reporting year.</p>

7	<p>Unless otherwise agreed to in writing by the Minister, the person taking the action must publish all plans or programs referred to in these conditions of approval on their website. Each plan or program must be published on the website within one month of being approved.</p> <p>Note: The Minister may agree in writing to exclude the requirement to publish information that is considered confidential.</p>	Compliant	<p>During the reporting period 3 Feb 2021 to 3 Feb 2022, the Ningaloo Vision OPEP was continuously available on the Santos Ltd website under Public Notifications (https://www.santos.com/about-us/corporate-governance/public-notices/).</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.</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 2021-2022 reporting year.</p>
8	<p>The Exmouth Gulf must not be used by support vessels during the period 15 September to 31 October.</p>	Not Applicable	<p>This condition is not applicable for the 2021-2022 reporting period as there were no construction/drilling activities associated with Coniston Novara Field Development project during this period.</p>
9	<p>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.</p>	Compliant	<p>Vessels and aircraft contracted to Santos WA implement the <i>Protected Marine Fauna Interaction and Sighting Procedure</i> (EA-91-II-00003) which is consistent with Part 8 of the Environment Protection and Biodiversity Conservation Regulations 2000 and includes reporting of cetacean sightings to the Department of Agriculture Water and Environment (DAWE) (formerly Department of Environment and Energy).</p>
10	<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</p>	Compliant	<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: (https://www.santos.com/about-us/corporate-governance/public-notices/).</p>

	<p>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>The earlier revision of the OPEP available on the Santos Ltd website during the reporting period addresses Condition 10 specifically as follows:</p> <p>Based on the above, Santo WA Energy considers that it was in compliance with Condition 10 during the 2021-2022 reporting year.</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>Section 10.4 Oil Spill Trajectory Modelling and 10.8 Shoreline and Coastal Habitat Assessment</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>Section 10.4 Oil Spill Trajectory Modelling and 6.8 Net Environmental Benefit Analysis (NEBA)</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>10 c), d) Sections: 9 – Source Control Plans 10 – Monitoring and Evaluate Plan 11 – Containment and Recovery Plan 12 – Mechanical Dispersion Plan 13 – Chemical Dispersion and Application Plan 14 – Shoreline Protection and Deflection Plan</p>
	<p>d) A demonstrated capacity to respond to a spill at the site. Identification of the response measures that can feasibly, and will, be applied within the first 48 hours of a spill occurring;</p>		

			<p>15 – Shoreline Clean-up Plan</p> <p>16 – Oiled Wildlife Response Plan</p> <p>17 – Waste Management Plan</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>Section 5.4 – Cost Recovery</p>
	<p>f) Training of staff in spill response measures and identifying roles and responsibilities of personnel during a spill response;</p>		<p>Section - 5.5 Training and Exercises</p>
	<p>g) Procedures for reporting spill incidents to the department; and</p>		<p>Section 7 – 7 External Notifications and Reporting Procedures</p>
	<p>h) A demonstrated procedure for testing, maintenance and review of the OSCP.</p>		<p>Section 5.5.3 – Response Testing</p> <p>Section 5.5.4 – Testing Schedule</p> <p>Section 20.1 – Document Review and Revision</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</p>		

	<p>until the OSCP is approved by the Minister. The approved OSCP must be implemented.</p> <p>Note: If a legal requirement is held by the proponent that requires submission of a plan that meets the above requirements, that plan may be submitted for the purpose of this condition.</p>		
11	<p>The person taking the action must develop and submit to the Minister for approval, an Operational and Scientific Monitoring Program that will be implemented in the event of a spill to determine the potential extent and ecosystem consequences of such a spill, including, but not limited to:</p>	Compliant	<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>
	<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>Section 10 – Monitor & Evaluate Plan (Operational Monitoring) and Appendix P – Scientific Monitoring Plans.</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>Section 10 – Monitor & Evaluate Plan (Operational Monitoring) and Appendix P – Scientific Monitoring Plans.</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</p>		<p>Section 5.4 – Cost Recovery.</p>

	environmental damage arising from potential spills;		
	d) Inclusion of sufficient baseline information on the biota and the environment that may be impacted by a potential spill, to enable an assessment of the impacts of such a spill. This must include sufficient information to determine the impact on the Whale shark population that feeds in the Ningaloo Marine World Heritage Area, including the reliance of this population of Whale sharks on coral spawning in the World Heritage Area as opposed to other food sources.		Section 18 – Scientific Monitoring Plan and Appendix N – Scientific Monitoring Plans.
	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		Section 18 – Scientific Monitoring Plan and Appendix N – Scientific Monitoring Plans.
	f) Provision for periodic review of the program.		18.5 Baseline Monitoring

	<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>		
12	<p>In the event of a spill, the person taking the action must pay all costs associated with:</p> <ul style="list-style-type: none"> a) All operational and scientific monitoring undertaken in response to the spill, as outlined in the OSMP approved by the Minister under Condition 11; b) any environmental management and remediation and/or equivalent determined necessary by the results of the OSMP. 	Compliant	<p>In accordance with Section 571(2) of the OPGGS Act, NOPSEMA require titleholders maintain financial assurance sufficient to give the titleholder carrying out the petroleum activity the capacity to meet the costs, expenses and liabilities that may result in connection with carrying out the petroleum activity. This includes the cost of spill response operational activities, including operational and scientific monitoring and remediation in response to a worst-case oil spill. NOPSEMA have endorsed the APPEA methodology for calculating the appropriate levels of financial assurance for pollution incidents (refer NOPSEMA guideline N-04750-GL1381). Santos undertook the calculation for ongoing operations using data from spill modelling conducted for worst case spill scenarios in accordance with this APPEA methodology and maintains insurances to cover these costs.</p> <p>Based on the above, Santos WA Energy considers that it was in compliance with Condition 12 during the 2021-2022 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. Santos WA Energy considers that it was in compliance with Condition 13 during the 2021-2022 reporting year.</p>
14	<p>The person taking the action must submit a Decommissioning Plan to the Minister for approval at least twelve months prior to commencement of the decommissioning phase. Appropriate consideration must be given to matters of national environmental significance as defined by the EPBC Act and the net environmental benefit analysis of pursuing the proposed plan.</p> <p>Note: If a legal requirement held by the person taking the action requires submission of a plan that meets the above requirements, that plan may be submitted for the purpose of this condition.</p>	Not applicable	<p>The facility is still in the operational phase, so Condition 14 did not apply during the 2021-2022 reporting period.</p>