

Santos

**EPBC APPROVAL NO.
2012/6615 SANTOS
GAS FIELD
DEVELOPMENT
PROJECT (GFD
PROJECT)
ANNUAL
COMPLIANCE
REPORT 2024**

20 February 2025

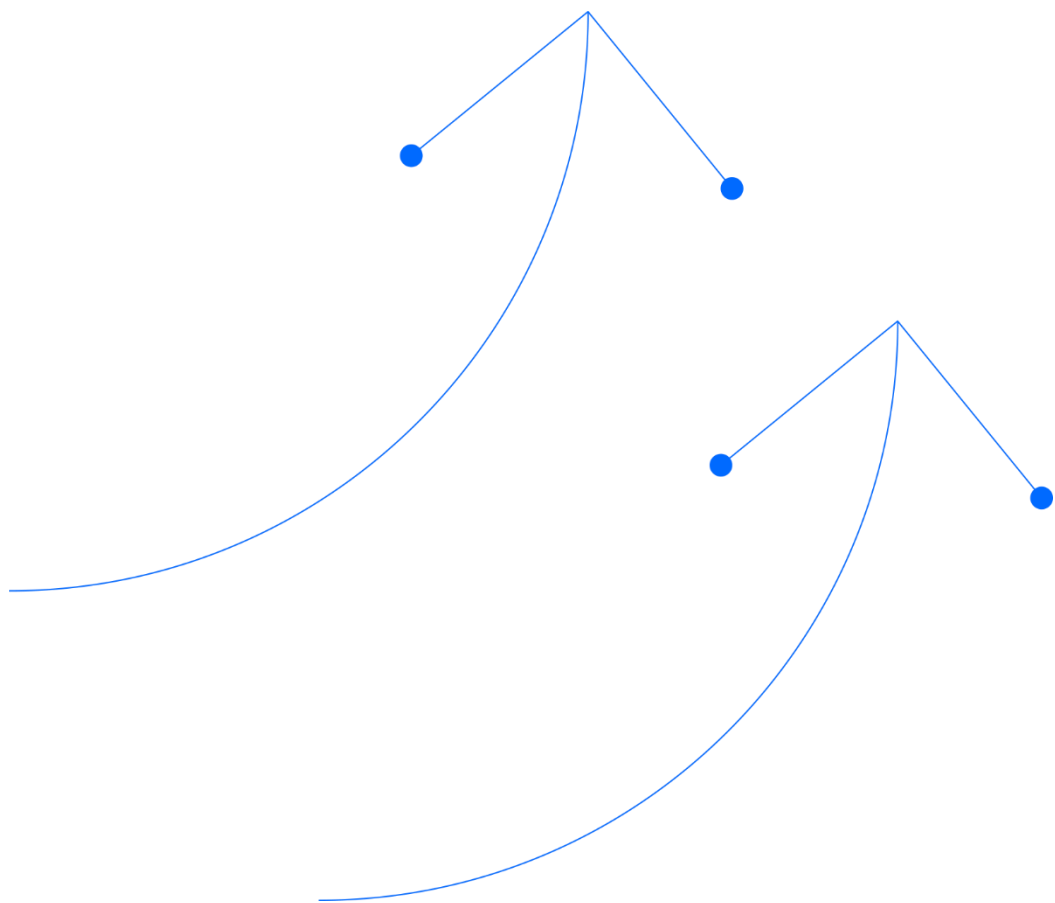



Table of contents

Declaration of Accuracy	2
1. Introduction	3

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	David Gornall
Position	Manager Environment EA PNG
Organisation	Santos Limited (ABN 80 007 550 923)
Date	18/2/25

1. Introduction

In November 2012, the Gas Field Development Project (the GFD Project) was referred to the Commonwealth Minister under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act). The GFD Project is an extension of the existing approved GLNG gas field development and will involve the construction, operation, decommissioning and rehabilitation of an additional 6,100 production wells and the associated supporting infrastructure needed to provide additional gas. On 22 March 2016, the GFD project received conditional approval (EPBC Act Approval 2012/6615) from the Minister for the Environment.

The 2024 Annual Compliance Report (2024 ACR) has been developed to satisfy Condition 34 of the EPBC Approval.

Condition 34 states:

“Unless otherwise agreed to in writing by the Minister, within three months of every 12-month anniversary of the commencement of the action, the approval holder must publish a report on its website addressing compliance with each of the conditions of this approval, including implementation of any management plans as specified in the conditions. Documentary evidence providing proof of the date of publication and details of non-compliance with any of the conditions of this approval must be provided to the Department at the same time as the compliance report is published. Reports must remain published for life of the approval.”

The date of commencement of the action was 20 November 2016. The relevant anniversary date of the EPBC Approval for the purposes of the 2024 ACR is 20 February 2025.

The EPBC Approval was amended on 28 April 2021. The amendment approved a number of variations to the conditions of approval relating to offsets, groundwater monitoring and management, CSG waste management, water quality management and the general conditions.

The 2024 ACR covers the period 20 November 2023 – 20 November 2024 (ACR Period). Table 1 outlines Santos' compliance with the conditions of the GFD approval during the ACR period and depicts the date of variation for each condition.

Table 1 - Compliance with Conditions of EPBC Act Approval No. 2012/6615

Date of decision	Conditions attached to approval	Is the Project compliant with the condition?	Compliance Notes
Variation dated 14 December 2018	1. The approval holder must only construct coal seam gas production wells within the GFD Project Tenements shown at <u>Attachment A</u> .	Compliant	All development including the construction of coal seam gas production wells was within the GFD Project Tenures shown on Attachment A. EPBC Act approval 2012/6615 was varied on 28 April 2021. The variation included changes to the following condition types; general, offsets, groundwater monitoring and management, CSG waste management and water quality management.
Original dated 22 March 2016	2. The action is limited to a maximum of 6,100 coal seam gas production wells and associated infrastructure.	Compliant	The action is limited to a maximum of 6,100 coal seam gas production wells. The number of production wells has not exceeded 6,100.
Variation dated 23 December 2016	2A. a. The approval holder must not release or discharge CSG produced water to surface water b. Condition 2A (a) will not apply if: i. the approval holder has referred the proposed release or discharge of CSG produced water to surface water to the Minister ; and ii. either: – the Minister has approved that release or discharge of CSG produced water ; or – the Minister has determined that the proposed release or discharge of CSG produced water does not require approval under the EPBC Act .	Compliant	Santos received approval on the 19 November 2023 to undertake controlled releases of desalinated co-produced water from the GLNG Gas Field Development (EPBC 2016/6615) to the Dawson River and tributary water courses, 50 km east of Injune, Queensland. See EPBC Act referral 2021/8914. No GFD CSG produced water has been released to surface water during the reporting period, with the approved action under EPBC act 2021/8914 not yet commenced.

Original dated 22 March 2016	3. The maximum disturbance limits in Annex 1 apply to the action to protect those EPBC threatened species, EPBC communities and EPBC migratory species (identified in Annex 1) within the project area . The approval holder must not exceed these maximum disturbance limits.	Compliant	The disturbance limits provide in Annex 1 have not been exceeded.
	Pre-disturbance surveys		
Original dated 22 March 2016	4. The approval holder must undertake pre-disturbance surveys of proposed disturbance areas, unless the approval holder has an alternative methodology to identify EPBC threatened species, EPBC communities and migratory species or habitat for an EPBC threatened species or EPBC migratory species approved by the Minister in writing.	Compliant	An alternative methodology to identify EPBC threatened species, EPBC communities and migratory species or habitat for an EPBC threatened species or EPBC migratory species is provided in Appendix A of the Environmental Protocol for Constraints Planning and Field Development (Constraints Protocol). This Constraints Protocol was approved by the Minister in writing on 26 October 2016. The surveys conducted within this reporting period were undertaken in accordance with Appendix A of the Constraints Protocol.
Original dated 22 March 2016	<i>Note 1: The approval holder may submit the alternative methodology for identifying EPBC threatened species, EPBC communities or habitat for an EPBC threatened species as part of the Constraints Protocol required at condition 7.</i>	Compliant	No changes to the methodology in Appendix A of the Constraints Protocol were submitted during the reporting period.
Original dated 22 March 2016	5. Pre-disturbance surveys must be supervised by a suitably qualified person and undertaken in accordance with the Department's survey guidelines in effect at the time of the survey or other equivalent survey methodology.	Compliant	Surveys conducted within this reporting period were supervised by a suitably qualified person in accordance with Appendix A of the Constraints Protocol.
Original dated 22 March 2016	6. When an EPBC threatened species, EPBC community or EPBC migratory species found in the project area for which there is no maximum disturbance limit identified in Annex 1, the approval holder must notify the Department in writing within five business days of finding the EPBC threatened species, EPBC community or EPBC migratory species . The approval holder must cease any activities that may or will impact on that EPBC threatened species, EPBC community or migratory species until relevant management plans have been revised to address these impacts and approved by the Minister in writing.	Compliant	No EPBC threatened species, EPBC community or EPBC migratory species for which there is no maximum disturbance limit identified in Annex 1 were found in the project area during the reporting period.

	EPBC Species Impact Management		
Original dated 22 March 2016	<p>7. The approval holder must submit an Environmental Protocol for Constraints Planning and Field Development (Constraints Protocol) for the Minister's written approval. The Constraints Protocol must:</p> <ul style="list-style-type: none"> a. detail the constraints which will apply to project activities with regard to their impact on EPBC threatened species, EPBC migratory species and their habitat, and to EPBC communities. b. be based on levels of constraints, including, but not limited to: <ul style="list-style-type: none"> i. the listing status of an EPBC threatened species and EPBC community; ii. the quality of the EPBC community and habitat for an EPBC threatened species and EPBC migratory species; iii. the number of different EPBC threatened species, EPBC migratory species and EPBC communities impacted by a project activity; and iv. the value of the EPBC community and habitat for an EPBC threatened species and EPBC migratory species in a regional context. 	Compliant	The Environmental Protocol for Constraints Planning and Field Development (Constraints Protocol) inclusive of the details required in Conditions 7a and 7b, was approved by the Minister in writing on 26 October 2016.
Original dated 22 March 2016	<p>8. The approval holder must not commence the action until the Constraints Protocol is approved by the Minister in writing.</p>	Compliant	The Environmental Protocol for Constraints Planning and Field Development (Constraints Protocol) was approved by the Minister in writing on 26 October 2016. The action had not commenced before this date.

<p>Original dated 22 March 2016</p>	<p>9. The approval holder must submit a Significant Species Management Plan for the Minister's written approval. The Significant Species Management Plan must include:</p> <ul style="list-style-type: none"> a. measures that will be taken to avoid, mitigate and manage impacts to EPBC threatened species and EPBC migratory species and their habitat, and EPBC communities during clearance of vegetation, including supervision by a suitably qualified person at all times during clearance of vegetation; b. measures that will be taken to avoid, mitigate and manage impacts to EPBC threatened species and EPBC migratory species and their habitat, and to EPBC communities during construction, operation and decommissioning of the action; c. details of how the approved Constraints Protocol has been applied to avoid and minimise impacts to EPBC threatened species and EPBC migratory species and their habitat and EPBC communities during construction, operation and decommissioning of the action; d. a monitoring program to determine the success of mitigation and management measures to ensure adaptive management for the duration of this approval; e. details of the timeframe for a regular review of the approved Significant Species Management Plan; and f. a discussion of relevant conservation advice, recovery plans and threat abatement plans and how measures proposed in the Significant Species Management Plan take into account relevant conservation advice and are consistent with the measures contained in relevant recovery plans and threat abatement plans. 	<p>Compliant</p>	<p>The Significant Species Management Plan (SSMP) inclusive of the details required in Conditions 9a and 9f, was approved by the Minister in writing on 27 October 2016.</p> <p>EPBC Act approval 2012/6615 was varied on 28 August 2017 to reflect contemporary project boundaries. In accordance with Condition 36, the SSMP was revised to reflect the project variation and Revision 1 of the SSMP was submitted to the Department on the 20 November 2017.</p> <p>No revisions of the SSMP were sought during the reporting period.</p>
<p>Original dated 22 March 2016</p>	<p>10. The approval holder must not commence the action until the Significant Species Management Plan has been approved by the Minister in writing. The approved Significant Species Management Plan must be implemented by the approval holder.</p>	<p>Compliant</p>	<p>The Significant Species Management Plan (SSMP) was approved by the Minister in writing on 27 October 2016. The action had not commenced before this date.</p>

Original dated 22 March 2016	<i>Note 2: The approval holder may submit an update to an existing management plan as required under the conditions of approval for the GLNG project (EPBC 2008/4059) provided the relevant matters under the conditions of this approval are clearly and adequately addressed. The approval holder may prepare and align a management plan required under these conditions with the requirements of the Queensland Government, provided the relevant matters under the conditions of this approval are clearly and adequately addressed.</i>	Compliant	No updates to any existing management plans were sought during the reporting period.
	Offsets		
Original dated 22 March 2016	11. The approval holder must ensure that environmental offsets comply with the principles of the EPBC Act Environmental Offsets Policy .	Compliant	All offsets are being managed in accordance with the relevant approved Offset Plans. All environmental Offset Plans comply with the principles of the EPBC Act Environmental Offsets Policy.
As varied on the date this instrument was signed (28 April 2021)	12. The approval holder may carry out the action in project phases . The approval holder must deliver environmental offsets for residual significant impacts to protected matters for each project phase .	Compliant	For the purposes of environmental offsets, Santos GLNG have carried out the approval in stages. Environmental offsets for residual significant impacts resultant from the Project have been delivered through the Staged Offset Plans.
As varied on the date this instrument was signed (28 April 2021)	13. The approval holder must submit an Offset Management Plan for the Minister's written approval. The Offset Management Plan may be prepared and submitted to the Minister for written approval in stages. If the approval holder submits the Offset Management Plan in stages, each version of the Offset Management Plan must address the known and predicted impacts of the completed, current, and next proposed project phases .	Compliant	The Stage 1 Offset Plan was approved by the Minister in writing on 31 October 2016. The Stage 2 Offset Plan was approved by the Minister in writing on 29 June 2018. A revised Stage 2 Offset Plan (Revision 6) was approved by the Minister in writing on 24 October 2019. A Stage 3 Offset Plan was approved by the Minister in writing on 17 May 2021. A Stage 4 Offset Plan was approved by the Minister in writing on 23 September 2021. A Stage 5 Offset Plan was approved by the Minister in writing on 24 March 2021. A stage 6 Offset Plan was submitted for approval on 24 th August 2023.
As varied on the	14. The Offset Management Plan must include for the first project phase :	Compliant	The Stage 1 Offset Plan was approved by the Minister in writing on 31 October 2016.

<p>date this instrument was signed (28 April 2021)</p>	<ol style="list-style-type: none"> a method for assessing residual significant impacts to EPBC threatened species, EPBC migratory species and EPBC communities; results from pre-disturbance surveys and/or an alternative approved methodology (if used) for the project phase as required under conditions 4 and 5; details of the offset areas required to address predicted residual significant impacts to EPBC threatened species, EPBC migratory species and EPBC communities for the project phase; a survey and description of the current condition (prior to any management activities) of each offset area proposed, including existing vegetation (the baseline condition). This must include a shapefile of each offset property boundary; information about how the offset areas provide connectivity with other relevant habitats and biodiversity corridors, including a map depicting the offset areas in relation to other habitats and biodiversity corridors; performance and completion criteria for evaluating the management of the offset area, and criteria for triggering remedial action (if necessary); a description of the management measures that will be implemented for the protection of EPBC threatened species, EPBC migratory species and EPBC communities, including a discussion of how measures outlined take into account relevant conservation advice and are consistent with the measures in relevant recovery plans and threat abatement plans; a program to monitor and report on the effectiveness of these measures, and progress against the performance and completion criteria; a description of potential risks to the successful implementation of the plan, and a description of the contingency measures that would be implemented to mitigate against these risks; a timeline for when actions identified in the Offset Management Plan will be implemented for each offset area; and 		<p>The Stage 2 Offset Plan was approved by the Minister in writing on 29 June 2018. A revised Stage 2 Offset Plan (Revision 6) was approved by the Minister in writing on 24 October 2019.</p> <p>A Stage 3 Offset Plan was approved by the Minister in writing on 17 May 2021.</p> <p>A Stage 4 Offset Plan was approved by the Minister in writing on 23 September 2021.</p> <p>A Stage 5 Offset Plan was approved by the Minister in writing on 24 March 2021</p> <p>All approved plans address these conditions.</p>
--	--	--	--

	k. the proposed legal mechanism and timing for legally securing the offset.		
As varied on the date this instrument was signed (28 April 2021)	15. The currently approved Offset Management Plan must be implemented by the approval holder .	Compliant	The currently approved Offset Management Plans are being implemented.
Variation dated 14 December 2018	16. The approval holder must register and legally secure offsets for the first project phase identified in the Offset Management Plan within two years of commencement of the first project phase .	Compliant	The project commenced on 16 November 2016. Offsets for the first project phase were acquitted on the Springwater property, with legal security being achieved on 6 April 2018, when a voluntary declaration was certified. The Springwater Offset Area is now identified as an area of high nature conservation value under section 19F of the <i>Vegetation Management Act 1999</i> (Qld).
As varied on the date this instrument was signed (28 April 2021)	17. The approval holder must register and legally secure offsets for a project phase which are sufficient to acquit the predicted residual significant impacts of that project phase .	Compliant	<p>The Springwater Offset Area is now identified as an area of high nature conservation value under section 19F of the <i>Vegetation Management Act 1999</i> (Qld). This property provides sufficient values to acquit impacts for project phase 1-3 and part of phase 4. Legal security of the approved offset area for subsequent project phases has commenced.</p> <p>During the 2021 reporting period (6 July 2021) the Queensland Department of Resources declared the Crowman Offset Area an area of high nature conservation value under section 19F of the <i>Vegetation Management Act 1999</i> (Qld).</p> <p>During the 2022 reporting period (12 September 2022) the Queensland Department of Resources declared the Bottle Tree Offset Area an area of high nature conservation value under section 19F of the <i>Vegetation Management Act 1999</i> (Qld).</p> <p>During the 2023 reporting period the Queensland Department of Resources declared the Mt Tabor Offset Area (4 January 2023) and the Cobbadah Offset Area (2 February 2023) areas of high nature conservation value under section 19F of the <i>Vegetation Management Act 1999</i> (Qld).</p>

As varied on the date this instrument was signed (28 April 2021)	<p>18. If the approval holder submits the Offset Management Plan in stages, the approval holder must prepare and submit the Offset Management Plan revised to address each subsequent project phase, for written approval by the Minister. Each revised Offset Management Plan must:</p> <ol style="list-style-type: none"> include the information required for the Offset Management Plan at condition 14 for the next project phase; include a reconciliation of actual and predicted but yet to be actualised residual significant impacts to EPBC threatened species, EPBC migratory species and EPBC communities against offsets secured for the commenced project phases. Secured offsets in excess of requirements arising from actual and predicted but yet to be actualised impacts of any commenced project phases may be subtracted from the obligations required for subsequent project phases. Any shortfall in secured offsets relative to the requirements arising from actual and predicted but yet to be actualised impacts of any commenced project phases must be added to the obligations required for the next project phase; and demonstrate how the offset builds on offsets already secured for previous project phases and will contribute to a larger strategic offset for cumulative project impacts. 	Compliant	<p>The Stage 1 Offset Plan was approved by the Minister in writing on 31 October 2016.</p> <p>The Stage 2 Offset Plan was approved by the Minister in writing on 29 June 2018. A revised Stage 2 Offset Plan (Revision 6) was approved by the Minister in writing on 24 October 2019.</p> <p>A Stage 3 Offset Plan was approved by the Minister in writing on 17 May 2021.</p> <p>A Stage 4 Offset Plan was approved by the Minister in writing on 23 September 2021.</p> <p>Stage 5 Offset Plan was approved by the Minister in writing on 24 March 2021</p> <p>All offset plans have been drafted to meet the requirements of Conditions 14a to 14k and 18a to 18c.</p>
As varied on the date this instrument was signed (28 April 2021)	<p>19. The approval holder must not commence the project phase until the Offset Management Plan for that project phase has been approved by the Minister in writing.</p>	Compliant	<p>There are currently five project phases. Each project phase has an approved offset plan. Commencement of each project phase has not occurred until the Offset Management Plan for that project phase has been approved.</p>
	Water management and monitoring		
As varied on the date this instrument was signed (28 April 2021)	<p>20. For the protection of water resources and EPBC-listed springs within the Surat CMA, the approval holder must ensure that the outcomes and sub-outcomes specified in the table below are achieved and maintained:</p>	Compliant	<p>The outcomes and sub-outcomes for the protection of water resources and EPBC-listed springs within the Surat CMA are being achieved and maintained.</p>

April 2021)	Controlling provision	Sections 18 and 18A EPBC Act	Section 24D and 24E EPBC Act					
	Protected matter or associated user of the protected matter	EPBC-listed springs	Water supply bores	Aquatic GDEs	Terrestrial GDEs	Subterranean GDEs		
	Outcome	Groundwater impacts due to CSG development must have no impact on the EPBC-listed springs. No impact is achieved by maintaining or enhancing groundwater discharge and environmental values at EPBC-listed springs.	Conditions within unconsolidated and consolidated hydrogeological units, including water level/pressure and water quality, maintain or improve ecosystem services and access by associated users.					
	Sub-outcome	None	Water supply bore continues to supply water for its intended purpose, or is made good.	No adverse effects on the function and environmental values due to CSG development.	No adverse effects to ensure habitat is maintained or improved.			
As varied on the date this instrument was signed (28 April 2021)	Note 2A: The approval holder is considered to have achieved and maintained an outcome for water resources within the Surat CMA when it has achieved and maintained the corresponding sub-outcome/s for water resources.						Compliant	Noted.

As varied on the date this instrument was signed (28 April 2021)	21. To ensure the outcomes in Condition 20 are achieved and maintained, the approval holder must manage impacts on water resources and EPBC-listed springs in accordance with the relevant risk management framework/s .	Compliant	Impacts on water resources and EPBC listed springs is managed in accordance with the risk management framework.																							
As varied on the date this instrument was signed (28 April 2021)	21A. If, at any time during the period for which this approval has effect, an impact/s potentially occurring within the approval holder’s project area is, or has been, identified as a high risk or very high risk impact in accordance with the relevant risk management framework/s , the approval holder must notify the Department within 20 business days .	Compliant	<p>On 4 June 2021, and in accordance with Condition 21A of EPBC Approval 2012/6615, Santos notified the Department of the potential for the following high risk or very high risk impacts to aquatic GDE’s (spring groups) in the GFD Project Area, as identified in the 2019 Underground Water Impact Report (UWIR) for the Surat Cumulative Management Area (CMA). The relevant spring groups are listed below.</p> <table><tr><th>Spring Group</th><th>Complex / Watercourse</th><th>Unmitigated Risk</th></tr><tr><td rowspan="3">Springrock</td><td>Springrock Creek (561)</td><td>Very high</td></tr><tr><td>Hutton Creek (W216)</td><td>Very high</td></tr><tr><td>Hutton Creek (W217)</td><td>Very high</td></tr><tr><td>Lonely Eddie</td><td>Lonely Eddie (339)</td><td>High</td></tr><tr><td rowspan="3">311</td><td>Dawson River (W40)</td><td>High</td></tr><tr><td>Hutton Creek (W81)</td><td>Very high</td></tr><tr><td>311 (311), Yebna 2 (591)</td><td>Very high</td></tr><tr><td>Lucky Last</td><td>Lucky Last (230)</td><td>Very high</td></tr></table>	Spring Group	Complex / Watercourse	Unmitigated Risk	Springrock	Springrock Creek (561)	Very high	Hutton Creek (W216)	Very high	Hutton Creek (W217)	Very high	Lonely Eddie	Lonely Eddie (339)	High	311	Dawson River (W40)	High	Hutton Creek (W81)	Very high	311 (311), Yebna 2 (591)	Very high	Lucky Last	Lucky Last (230)	Very high
Spring Group	Complex / Watercourse	Unmitigated Risk																								
Springrock	Springrock Creek (561)	Very high																								
	Hutton Creek (W216)	Very high																								
	Hutton Creek (W217)	Very high																								
Lonely Eddie	Lonely Eddie (339)	High																								
311	Dawson River (W40)	High																								
	Hutton Creek (W81)	Very high																								
	311 (311), Yebna 2 (591)	Very high																								
Lucky Last	Lucky Last (230)	Very high																								

As varied on the date this instrument was signed (28 April 2021)	21B. If a high risk or very high risk impact is identified under Condition 21A before the UWIR 2019 is replaced with an updated UWIR , the approval holder must submit the information required under Condition 21C within 3 months (or a timeframe otherwise agreed to by the Minister in writing) of notifying the Department of the high risk or very high risk impact .	Compliant	<p><u>Aquatic GDEs</u></p> <p>On 4 June 2021, and in accordance with Condition 21A of EPBC Approval 2012/6615, Santos notified the Department of the potential for the following high risk or very high risk impacts to aquatic GDE’s (spring groups) in the GFD Project Area, as identified in the 2019 Underground Water Impact Report (UWIR) for the Surat Cumulative Management Area (CMA). The relevant spring groups are listed below.</p> <table><tr><th>Spring Group</th><th>Complex / Watercourse</th><th>Unmitigated Risk</th></tr><tr><td rowspan="3">Springrock</td><td>Springrock Creek (561)</td><td>Very high</td></tr><tr><td>Hutton Creek (W216)</td><td>Very high</td></tr><tr><td>Hutton Creek (W217)</td><td>Very high</td></tr><tr><td>Lonely Eddie</td><td>Lonely Eddie (339)</td><td>High</td></tr><tr><td rowspan="3">311</td><td>Dawson River (W40)</td><td>High</td></tr><tr><td>Hutton Creek (W81)</td><td>Very high</td></tr><tr><td>311 (311), Yebna 2 (591)</td><td>Very high</td></tr><tr><td>Lucky Last</td><td>Lucky Last (230)</td><td>Very high</td></tr></table> <p>On 4 June 2021, it was requested that an extension of time of six months be granted by the Minister for Santos to satisfy the information requirements of Condition 21B and 21C as Santos was advised the new draft UWIR for the Surat CMA will revise the risk level of impact to some or all of the above identified springs.</p>	Spring Group	Complex / Watercourse	Unmitigated Risk	Springrock	Springrock Creek (561)	Very high	Hutton Creek (W216)	Very high	Hutton Creek (W217)	Very high	Lonely Eddie	Lonely Eddie (339)	High	311	Dawson River (W40)	High	Hutton Creek (W81)	Very high	311 (311), Yebna 2 (591)	Very high	Lucky Last	Lucky Last (230)	Very high
Spring Group	Complex / Watercourse	Unmitigated Risk																								
Springrock	Springrock Creek (561)	Very high																								
	Hutton Creek (W216)	Very high																								
	Hutton Creek (W217)	Very high																								
Lonely Eddie	Lonely Eddie (339)	High																								
311	Dawson River (W40)	High																								
	Hutton Creek (W81)	Very high																								
	311 (311), Yebna 2 (591)	Very high																								
Lucky Last	Lucky Last (230)	Very high																								

			<p>The delegate's letter in response to Santos' request for an extension of time to provide information to satisfy the information requirements of Condition 21B and 21C under EPBC 2012/6615 was received on 3 September 2021.</p> <p>A statement as to why the provision of performance criteria, trigger values, limits and contributing well/s was not necessary was provided to the Department for the written agreement of the Minister, in accordance with Condition 21C of EPBC 2012/6615, on 16 May 2023.</p> <p>Santos received a request for more information from the Department. Santos provided the requested information on 30 November 2023. The Department provided comments on the information on 27 June 2024 requesting additional actions by Santos. Santos responded to the Department's comments and actions on 19 December 2024.</p>																
As varied on the date this instrument was signed (28 April 2021)	<p>21C. Within 9 months (or a timeframe otherwise agreed to by the Minister in writing), of notifying the Department of a high risk or very high risk impact, the approval holder must provide for the written approval of the Minister:</p> <p>a. description and location of impact/s and associated users;</p> <p>b. performance criteria;</p> <p>c. trigger values;</p> <p>d. limits; and</p> <p>e. the contributing well/s, including identification number, GPS coordinates and shapefiles.</p> <p>Or provide a statement as to why the provision of performance criteria, trigger values, limits and contributing well/s is not necessary for the written agreement of the Minister.</p>	Compliant	<p>On 4 June 2021, and in accordance with Condition 21A of EPBC Approval 2012/6615, Santos notified the Department of the potential for the following high risk or very high risk impacts to aquatic GDE's (spring groups) in the GFD Project Area, as identified in the 2019 Underground Water Impact Report (UWIR) for the Surat Cumulative Management Area (CMA). The relevant spring groups are listed below.</p> <table><tr><th>Spring Group</th><th>Complex / Watercourse</th><th>Unmitigated Risk</th></tr><tr><td rowspan="3">Springrock</td><td>Springrock Creek (561)</td><td>Very high</td></tr><tr><td>Hutton Creek (W216)</td><td>Very high</td></tr><tr><td>Hutton Creek (W217)</td><td>Very high</td></tr><tr><td>Lonely Eddie</td><td>Lonely Eddie (339)</td><td>High</td></tr><tr><td>311</td><td>Dawson River (W40)</td><td>High</td></tr></table>	Spring Group	Complex / Watercourse	Unmitigated Risk	Springrock	Springrock Creek (561)	Very high	Hutton Creek (W216)	Very high	Hutton Creek (W217)	Very high	Lonely Eddie	Lonely Eddie (339)	High	311	Dawson River (W40)	High
Spring Group	Complex / Watercourse	Unmitigated Risk																	
Springrock	Springrock Creek (561)	Very high																	
	Hutton Creek (W216)	Very high																	
	Hutton Creek (W217)	Very high																	
Lonely Eddie	Lonely Eddie (339)	High																	
311	Dawson River (W40)	High																	

	Hutton Creek (W81)	Very high
	311 (311), Yebna 2 (591)	Very high
Lucky Last	Lucky Last (230)	Very high

On 4 June 2021, it was requested that an extension of time of six months be granted by the Minister for Santos to satisfy the information requirements of EPBC Approval 2012/6615 Condition 21B and 21C as Santos was advised the new draft UWIR for the Surat CMA will revise the level risk of impact to some or all of the above identified springs.

The delegate's letter in response to Santos' request for an extension of time to provide information to satisfy the information requirements of Condition 21B and 21C under EPBC 2012/6615 was received on 3 September 2021.

A statement as to why the provision of performance criteria, trigger values, limits and contributing well/s was not necessary was provided to the Department for the written agreement of the Minister, in accordance with Condition 21C of EPBC 2012/6615, on 16 May 2023.

Santos received a request for more information from the Department. Santos provided the requested information on 30 November 2023. The Department provided comments on the information on 27 June 2024 requesting additional actions by Santos. Santos responded to the Department's comments and actions on 19 December 2024.

Terrestrial GDEs

In accordance with Condition 21A of the Santos Gas Field Development (GFD) Project EPBC 2012-6614 approval, Santos notified DCCEEW on 1 November 2022 of the potential for high-risk impact to terrestrial groundwater dependent ecosystems (TGDEs) that had been identified in a supplementary risk assessment undertaken in accordance with Section 6.4 of the Coal Seam Gas - Joint Industry Framework (JIF) dated 17 March 2021.

			In accordance with Condition 21C of the EPBC 2012-6614 approval, within 9 months (or a timeframe otherwise agreed to by the Minister in writing) of notifying the Department of a high-risk Santos must provide a description of the impacts, performance criteria, trigger values, limits and contributing wells, accompanied by a site-specific assessment (as per condition 21E).
As varied on the date this instrument was signed (28 April 2021)	21D. If the statement provided under Condition 21C is not agreed to by the Minister in writing, the approval holder must provide the description and location of impact/s and associated users, performance criteria , trigger values , limits and contributing well/s for the written approval of the Minister within a timeframe specified by the Minister in writing.	Compliant	This condition was not triggered during the reporting period.
As varied on the date this instrument was signed (28 April 2021)	21E. A description and location of impact/s and associated users, performance criteria , trigger values , limits and contributing well/s , or statement provided under Condition 21C, must be submitted to the Minister with an accompanying site-specific assessment prepared by a suitably qualified water resources expert and accompanied by a peer review undertaken by an independent suitably qualified water resources expert .	Compliant	This condition was not triggered during the reporting period.
As varied on the date this instrument was signed (28 April 2021)	<i>Note 2B: The approval holder may submit a SIMS mitigation plan as its site-specific assessment for EPBC-listed springs and aquatic GDEs provided that it meets the requirements of the site-specific assessment. Where a SIMS mitigation plan is determined by the Minister in writing to meet the requirements of the site-specific assessment, the SIMS mitigation plan is taken to be peer reviewed and therefore does not need to be accompanied by a site-specific assessment prepared by a suitably qualified water resources expert.</i>	NA	Noted.
As varied on the date this instrument was signed (28 April 2021)	21F. If the information specified in Conditions 21C(a) to 21C(e) has not been approved by the Minister in writing within 6 months of being provided to the Minister , the approval holder must undertake impact management in accordance with any interim performance criteria , trigger values and limits set by the Minister in writing.	Compliant	This condition was not triggered during the reporting period.

As varied on the date this instrument was signed (28 April 2021)	Note 2C: The approval holder will only be required to undertake impact management in accordance with interim performance criteria, trigger values and limits where the Minister is not satisfied that the information specified in Conditions 21C(a) to 21C(e) will ensure the outcome/s specified under Condition 20 will be, or are likely to be, achieved.	NA	Noted.
As varied on the date this instrument was signed (28 April 2021)	Note 2D: The Minister , in determining whether to direct the approval holder to undertake impact management in accordance with interim performance criteria, trigger values and limits , will consider all relevant information including, but not limited to, legislation and policy, information provided by the approval holder under Condition 21C and Condition 21E, and any other relevant information available to the Minister at the time of the decision.	NA	Noted.
As varied on the date this instrument was signed (28 April 2021)	21G. The approval holder must undertake impact management in accordance with the interim performance criteria, trigger values and limits until the performance criteria, trigger values and limits required under Condition 21C are approved by the Minister in writing.	Compliant	This condition was not triggered during the reporting period.

As varied on the date this instrument was signed (28 April 2021)	<p>21H. The approval holder must submit an Outcomes Assurance Statement for each high risk or very high risk impact to the Minister for each 12 month period: following the date of approval of the description and location of impact/s and associated users, performance criteria, trigger values and limits; or</p> <ol style="list-style-type: none"> following the date the Minister notified the approval holder in writing that interim performance criteria, trigger values and limits had been set; or following the date the Minister notified the approval holder in writing that interim performance criteria, trigger values and limits had been set; or following the date otherwise agreed to in writing by the Minister. <p>The Outcomes Assurance Statement must be submitted in accordance with reporting requirements specified in the JIF.</p>	Compliant	This condition was not triggered during the reporting period.
As varied on the date this instrument was signed (28 April 2021)	<p>21I. The approval holder must provide any additional information requested by the Minister in writing, within the timeframe specified by the Minister in writing, to substantiate an Outcomes Assurance Statement and/or to verify the risk of not achieving the outcome/s specified in Condition 20.</p>	Compliant	This condition was not triggered during the reporting period.
As varied on the date this instrument was signed (28 April 2021)	<p>Note 2E: The Minister may throughout the life of this approval seek advice from experts, or an expert panel. As a consequence, specific matters identified through such advice may need to be addressed in the site-specific assessment or any Outcomes Assurance Statement. Where such advice is sought, the approval holder will be provided with the opportunity to submit information and respond to the specific matters identified, in order to ensure Outcomes Assurance Statements are based on the best available information. Review requirements will facilitate adaptive management, align with Queensland Government approval requirements, and account for potential cumulative impacts as new scientific information becomes available over the life of this approval.</p>	NA	Noted.

As varied on the date this instrument was signed (28 April 2021)	21J. If the Minister believes on the basis of an Outcomes Assurance Statement , any information provided under Condition 21K and any other relevant information that the outcomes in Condition 20 are not likely to be achieved, the Minister may notify the approval holder in writing specifying the areas requiring improvement or additional information. If notified, the approval holder must develop and implement adaptive management responses to address the specified areas and provide a written report to the Minister within 3 months of the notification setting out the responses and their effectiveness.	Compliant	This condition was not triggered during the reporting period.
As varied on the date this instrument was signed (28 April 2021)	Note 2F: If there is an exceedance of a limit , Condition 21L requires this to be reported to the Minister and Condition 22 requires the approval holder to cease groundwater extraction within 10 business days of that notification.	NA	Noted.
As varied on the date this instrument was signed (28 April 2021)	21K. If the approval holder detects that an approved or interim trigger value has been exceeded, the approval holder must implement an appropriate management response to ensure approved or interim limits are not exceeded. The approval holder must report this exceedance, and the contributing well/s , to the Department within 10 business days of the detection.	Compliant	This condition was not triggered during the reporting period.
As varied on the date this instrument was signed (28 April 2021)	21L. If the approval holder detects that an approved or interim limit has been exceeded, the approval holder must report this and the contributing well/s to the Department within 10 business days of the detection.	Compliant	This condition was not triggered during the reporting period.

As varied on the date this instrument was signed (28 April 2021)	22. Unless otherwise notified by the Minister in writing, the approval holder must cease groundwater extraction associated with the contributing well/s identified in Condition 21L within 10 business days of an exceedance of a limit being reported to the Department , or of receiving notification that the Minister has determined that the outcome/s specified under Condition 20 have not been achieved.	Compliant	This condition was not triggered during the reporting period.
As varied on the date this instrument was signed (28 April 2021)	Note 2G: The Minister , in determining whether to give notice to the approval holder that it is not required to cease groundwater extraction , will consider all relevant information including but not limited to legislation and policy, information provided by the approval holder (including any submissions made by the approval holder on alternative corrective actions that it proposes to take) and any other information available to the Minister at the time of the decision.	NA	Noted.
As varied on the date this instrument was signed (28 April 2021)	22A. Revoked	NA	This condition was inserted on 14 December 2018 and revoked on 28 April 2021.
As varied on the date this instrument was signed (28 April 2021)	22B. Revoked.	NA	This condition was inserted on 14 December 2018 and revoked on 28 April 2021.
As varied on the date this instrument was signed (28 April 2021)	22C. Revoked.	NA	This condition was inserted on 14 December 2018 and revoked on 28 April 2021.

April 2021)			
As varied on the date this instrument was signed (28 April 2021)	23. If the approval holder has been required to cease groundwater extraction pursuant to Condition 22, the approval holder must urgently implement corrective actions to reduce performance criteria below approved or interim limits and trigger values . The approval holder must not recommence groundwater extraction until: <ul style="list-style-type: none"> a. the impact has been reversed; or b. the Minister has agreed, in writing, that the outcome/s specified in Condition 20 has been achieved; and c. written approval to recommence groundwater extraction has been given by the Minister. 	Compliant	This condition was not triggered during the reporting period.
As varied on the date this instrument was signed (28 April 2021)	Note 2H: Approval to recommence groundwater extraction may be subject to conditions that the Minister considers reasonable.	NA	Noted.
As varied on the date this instrument was signed (28 April 2021)	23A. Revoked.	NA	This condition was inserted on 14 December 2018 and revoked on 28 April 2021.
As varied on the date this instrument was signed (28 April 2021)	24. Revoked.	NA	This condition was inserted on 14 December 2018 and revoked on 28 April 2021.

April 2021)			
As varied on the date this instrument was signed (28 April 2021)	Note 3: Revoked	NA	This condition was inserted on 14 December 2018 and revoked on 28 April 2021.
	CSG Waste Management		
As varied on the date this instrument was signed (28 April 2021)	25. The approval holder must submit a CSG Waste Management Plan (CSGWMP) for the project area to the Minister for approval.	Compliant	The CSGWMP, inclusive of the details required in Condition 25B was approved by the Minister in writing on 28 April 2021.
As varied on the date this instrument was signed (28 April 2021)	25A. Revoked	NA	This condition was inserted on 14 December 2018 and revoked on 28 April 2021.

As varied on the date this instrument was signed (28 April 2021)	<p>25B. A CSGWMP must include, for the relevant area:</p> <ol style="list-style-type: none"> measures that will be implemented to avoid, mitigate and manage impacts to surface water and groundwater resources, EPBC threatened species, EPBC migratory species and EPBC communities as a result of the storage and disposal of CSG produced water and waste products during the life of the action; monitoring to measure the amount of CSG produced water and waste products produced during the life of the action; details of how the CSG produced water and waste products will be stored, managed and disposed of including, but not limited to: <ul style="list-style-type: none"> beneficial reuse; re-injection into groundwater aquifers; and transfer to a licensed waste management facility. early warning indicators, trigger thresholds and limits for detecting impacts on surface water and groundwater quality as a result the storage and disposal of CSG produced water and waste products; and details of a risk based exceedance response for the activities the approval holder will undertake, and the timeframes in which these activities will be undertaken, if early warning indicators, trigger threshold values or limits are exceeded, including reporting of the location and severity of exceedances to the Minister. 	Compliant	The CSGWMP, inclusive of the details required in Condition 25B was approved by the Minister in writing on 28 April 2021.
As varied on the date this instrument was signed (28 April 2021)	<p>26. The Minister may direct, in writing, that the approval holder cease an activity associated with the storage and disposal of CSG produced water and waste products if:</p> <ol style="list-style-type: none"> that activity results in the exceedance of an early warning indicator, trigger threshold or limit in the approved CSGWMP; and the Minister is not satisfied that the corrective activities proposed or taken by the approval holder will reduce likely impacts on protected matters to acceptable levels. 	Compliant	<p>No early warning indicator, trigger threshold or limit were exceeded during the reporting period.</p> <p>The Minister did not make any directions to cease water extraction from a coal seam gas well/s during the reporting period.</p>

As varied on the date this instrument was signed (28 April 2021)	26A. If Condition 26 applies, the Minister may direct the approval holder to implement alternate corrective activities at the expense of the approval holder , provided those corrective activities are unlikely to have a significant impact on protected matters .	NA	Not applicable – see response to Condition 26.
As varied on the date this instrument was signed (28 April 2021)	26B. If Condition 26 applies, the approval holder must not recommence the activity identified in Condition 26 until the Minister has given approval in writing for the recommencement of that activity. Approval to recommence the activity may be subject to conditions that the Minister considers reasonable.	NA	Not applicable – see response to Condition 26.
As varied on the date this instrument was signed (28 April 2021)	27. The approval holder must not commence the storage and disposal of CSG produced water and waste products until the CSGWMP has been approved for the project area . An approved CSGWMP must be implemented by the approval holder .	Compliant	The CSGWMP, inclusive of the details required in Condition 25B was approved by the Minister in writing on 28 April 2021. The CSGWMP was implemented during the reporting period.
Variation dated 14 December 2018	27A. Revoked	NA	This condition was inserted on 29 September 2017 and revoked on 14 December 2018.
Variation dated 23 December 2016	<i>Note 4: Revoked</i>	NA	This condition was inserted on 22 March 2016 and revoked on 23 December 2016.

	Water Quality Management		
As varied on the date this instrument was signed (28 April 2021)	<p>28. The approval holder must, prior to the commencement of coal seam gas operations, submit to the Minister for approval a Chemical Risk Assessment Framework (CRAF) that details how the risk of adverse impacts on protected matters posed by chemicals will be assessed and managed for the duration of this approval. The CRAF must include, but is not limited to:</p> <ul style="list-style-type: none"> a. Details of how the risks will be assessed consistent with best practice risk assessment methodology, and how the assessment will address: <ul style="list-style-type: none"> i. the process lifecycle for chemicals; ii. how risk from geogenic chemicals in CSG produced water and recovered drilling fluids will be managed to prevent adverse impacts to protected matters; and iii. minimum mitigation and management measures to be undertaken as part of coal seam gas operations. b. Details of the criteria by which chemicals will be categorised, based on the properties of each chemical. Criteria must include, but not be limited to: <ul style="list-style-type: none"> i. combined persistence, bioaccumulative and toxicity assessment; ii. chemical database of concern assessment; and iii. specific persistence, bioaccumulative and toxicity assessment. <p>These details must be used to determine the risk assessment requirements appropriate to all chemicals in each category. This will include consideration of toxicological profile, qualitative risk assessment, quantitative risk assessment and site-specific information requirements.</p> <ul style="list-style-type: none"> c. Detail a risk assessment process for each chemical to determine risk to protected matters from the chemical's use. This process must: <ul style="list-style-type: none"> i. identify the risk assessment requirements based on the chemical's category; 	Compliant	The CRAF, inclusive of the details required in Condition 28 was approved by the Minister in writing on 28 April 2021.

	<ul style="list-style-type: none"> ii. consider the chemical's intended use and function, and an estimation of the quantity of the chemical likely to be used, and at what concentration, in a typical year; iii. consider the likely environmental fate of the chemical; and iv. consider what, if any, mitigation and management measures are needed to prevent adverse impacts to protected matters from that chemical for the duration of this approval. <p>d. Details of the process by which risk assessments for low-risk chemicals will be peer reviewed by an independent chemical risk assessment expert. This process must:</p> <ul style="list-style-type: none"> i. consider any checklists completed by the independent chemical risk assessment expert, to demonstrate that risks have been adequately assessed; and ii. include provision of a signed and dated statement from the independent chemical risk assessment expert confirming that the chemical has been correctly categorised. <p>e. Details of the process for recording each chemical's risk assessment in a register on the approval holder's website and for the provision of each chemical's risk assessment to the Department.</p> <p>f. A commitment to link any relevant mitigation and management measures required for the storage and disposal of waste products arising from coal seam gas operations in the CSGWMP.</p> <p>g. Details of a process to monitor and report on the implementation of any mitigation and management measures undertaken during use and handling of chemicals, to demonstrate no adverse impacts to protected matters, including:</p> <ul style="list-style-type: none"> i. a monitoring and reporting framework that can measure and monitor the scale of hydraulic fracturing; and ii. to notify the Department if an adverse impact to protected matters is detected. 		
--	---	--	--

	h. Details of the process by which information in the risk assessments will be adaptively used to address any accidental release of a chemical to prevent adverse impacts to protected matters .		
As varied on the date this instrument was signed (28 April 2021)	28A. The approval holder must not commence coal seam gas operations until the CRAF has been approved by the Minister in writing. The approval holder must implement the approved CRAF for the duration of this approval and publish the CRAF on its website within 20 business days of it being approved by the Minister and for the duration of this approval.	Compliant	<p>The CRAF, inclusive of the details required in Condition 28A was approved by the Minister in writing on 28 April 2021. The CRAF was implemented during the reporting period.</p> <p>The CRAF was published on the Santos website on 28 April 2021, within 20 business days of being approved by the Minister. The CRAF will remain on the website for the life of the approval.</p>
As varied on the date this instrument was signed (28 April 2021)	28B. The approval holder may, at any time, submit a revised CRAF to the Minister for written approval.	Compliant	This condition was not triggered during the reporting period.
Variation dated 14 December 2018	29. Revoked	NA	This condition was inserted on 14 December 2018 and revoked on 28 April 2021.

Variation dated 14 December 2018	29A. Revoked	NA	This condition was inserted on 14 December 2018 and revoked on 28 April 2021.
Variation dated 14 December 2018	29B. Revoked	NA	This condition was inserted on 14 December 2018 and revoked on 28 April 2021.
As varied on the date this instrument was signed (28 April 2021)	29C. Revoked	NA	This condition was inserted on 18 December 2018 and revoked on 28 April 2021.
As varied on the date this instrument was signed (28 April 2021)	29D. Revoked	NA	This condition was inserted on 18 December 2018. Revoked 28 April 2021.
As varied on the date this instrument was signed (28 April 2021)	30. Revoked	NA	This condition was inserted on 14 December 2018 and revoked on 28 April 2021.
As varied on the date this instrument was signed (28 April 2021)	30A. The approval holder must not use a low risk chemical until that chemical's risk assessment has been recorded in the register and it has been provided to the Department as required by the approved CRAF.	Compliant	The CRAF was approved by the Minister in writing on 28 April 2021. No low-risk chemical(s), as assessed in accordance with the CRAF, were used prior to the risk assessment being recorded on the register or prior to the provision to the Department.

April 2021)			
As varied on the date this instrument was signed (28 April 2021)	30B. The approval holder must not use a high risk chemical until the Minister has approved that chemical's risk assessment in writing and the risk assessment has been recorded in the register as required by the approved CRAF.	Compliant	The CRAF was approved by the Minister in writing on 28 April 2021. No high risk chemical(s), as assessed in accordance with the CRAF, were used prior to the risk assessment being approved by the Minister or prior to being recorded in the register.
As varied on the date this instrument was signed (28 April 2021)	31. Revoked	NA	This condition was inserted on 14 December 2018 and revoked on 28 April 2021.
As varied on the date this instrument was signed (28 April 2021)	31A. The approval holder must engage a chemical risk assessment expert to peer review all risk assessments at least once every 5 years, commencing from the date of the Minister's approval of the CRAF. The peer review of all risk assessments must be completed before the end of each 5-year anniversary of the Minister's approval of the CRAF. The peer review must include: <ul style="list-style-type: none"> a. an assessment of whether all risk assessments on the register are consistent with current scientific knowledge; b. an evaluation of the adequacy of relevant monitoring, mitigation and management measures that have been implemented by the approval holder; and c. an explanation of how the approval holder will address or has addressed any concerns raised by the peer review. 	Compliant	This condition was not triggered during the reporting period.

As varied on the date this instrument was signed (28 April 2021)	31B. The approval holder must, within 60 business days of the completion of the peer review, submit to the Department a signed statement by the chemical risk assessment expert detailing the findings of the 5-year peer review and evidence of how any concerns raised by the peer review have been addressed.	Compliant	This condition was not triggered during the reporting period.
	General		
Original dated 22 March 2016	32. Within 20 days after the commencement of the action , the approval holder must advise the Department in writing of the actual date of commencement .	Compliant	The GFD project commenced on 20 November 2016. The Department was notified in writing via a letter dated 25 November 2016.
Original dated 22 March 2016	33. The approval holder must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the management plans required by this approval, and make them available upon request to the Department . Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act , or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media.	Compliant	Records substantiating activities associated with the requirements of the approval have been maintained.
Original dated 22 March 2016	34. Unless otherwise agreed to in writing by the Minister , within three months of every 12 month anniversary of the commencement of the action , the approval holder must publish a report on its website addressing compliance with each of the conditions of this approval, including implementation of any management plans as specified in the conditions. Documentary evidence providing proof of the date of publication and details of non-compliance with any of the conditions of this approval must be provided to the Department at the same time as the compliance report is published. Reports must remain published for life of the approval.	Compliant	This document is the Annual Compliance Report. This report addresses compliance with each of the conditions of this approval.

Original dated 22 March 2016	35. Upon the direction of the Minister , the approval holder must ensure that an independent audit of compliance with the conditions of approval is conducted, and a report submitted to the Minister . The independent auditor and audit criteria must be approved by the Minister prior to the commencement of the audit. The audit report must address the approved criteria to the satisfaction of the Minister .	Compliant	During the reporting period there was no independent audit of compliance directed by the Minister.
As varied on the date this instrument was signed (28 April 2021)	36. The approval holder may choose to revise an action management plan approved by the Minister under conditions 9 and 25 without submitting it for approval under section 143A of the EPBC Act , if the taking of the action in accordance with the revised plan would not be likely to have a new or increased impact . If the approval holder makes this choice, the approval holder must: <ul style="list-style-type: none"> a. notify the Department in writing that the approved plan has been revised and provide the Department with: <ul style="list-style-type: none"> i. an electronic copy of the revised plan marked up with track changes to show the differences between the approved plan and the revised plan; ii. an explanation of the differences between the approved plan and the revised plan; iii. the reasons the approval holder considers that taking the action in accordance with the revised plan would not be likely to have a new or increased impact; and iv. written notice of the date on which the approval holder will implement the revised plan (revised plan implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the Department. b. subject to condition 38, implement the revised plan from the revised plan implementation date. 	Compliant	Any amendments made to management plans approved by the Minister under conditions 9 and 25 are discussed in the relevant sections above.

Original dated 22 March 2016	37. The approval holder may revoke its choice under condition 36 at any time by notice to the Department . If the approval holder revokes the choice to implement a revised plan or strategy, without approval under section 143A of the Act, the plan or strategy most recently approved by the Minister must be implemented.	Compliant	During the reporting period the choice provided for under condition 36 was not revoked.
Original dated 22 March 2016	38. If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the revised plan or strategy would be likely to have a new or increased impact , then: <ul style="list-style-type: none"> a. condition 36 does not apply, or ceases to apply, in relation to the revised plan or strategy; and b. the approval holder must implement the plan or strategy most recently approved by the Minister. To avoid any doubt, this condition does not affect any operation of conditions 36 and 37 in the period before the day the notice is given. At the time of giving the notice the Minister may also notify that for a specified period of time that condition 36 does not apply for one or more specified plans or strategies required under the approval.	Compliant	Any amendments made to management plans approved by the Minister under conditions 9 and 25 are discussed in the relevant sections above.
As varied on the date this instrument was signed (28 April 2021)	38A. If the approval holder proposes to vary a management plan approved under conditions 9 and 25 and the taking of the action in accordance with the revised plan would have a new and increased impact on a protected matter , the approval holder must submit the revised plan to the Minister for approval.	Compliant	Any amendments made to management plans approved by the Minister under conditions 9 and 25 are discussed in the relevant sections above.
Variation dated 14 December 2018	38B. If condition 38A applies, the approval holder must not implement the revised plan unless it has been approved by the Minister .	Compliant	No plans varied under condition 38A were implemented without first being approved by the Minister.
Variation dated 14 December 2018	38C. If condition 38A applies, the approval holder must implement the revised plan if it has been approved by the Minister .	Compliant	All approved plans have been implemented.

Variation dated 14 December 2018	39. Conditions 36, 37, 38, 38A, 38B and 38C are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised plan or strategy to the Minister for approval.	NA	Noted.
Original dated 22 March 2016	40. If, at any time after 10 years from the date of this approval, the approval holder has not substantially commenced the action , then the approval holder must not substantially commence the action without the written agreement of the Minister .	Compliant	The GFD project commenced on 20 November 2016. The Department was notified in writing via a letter dated 25 November 2016.
Original dated 22 March 2016	41. Unless otherwise agreed to in writing by the Minister , the approval holder must publish all management plans, strategies and reports, referred to in these conditions of approval on its website. Each management plan and/or strategy must be published on the website within 1 month of being approved by the Minister . All published reports must remain on website for the life of the approval.	Compliant	All management plans, strategies and reports, referred to in these conditions of approval were published on the Santos website within 1 month of being approved by the Minister. All published reports will remain on website for the life of the approval.