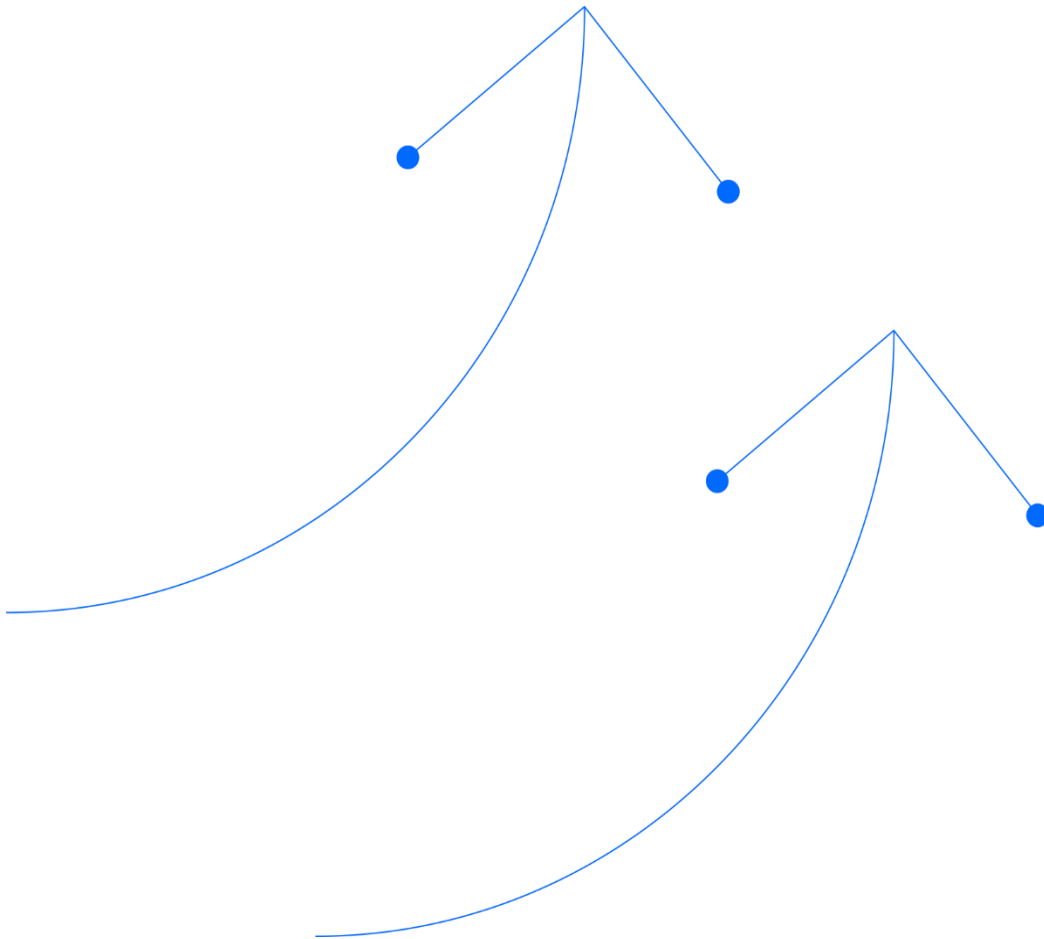




Annual Compliance Report 2024-2025 Coniston/Novara Field Development Project (EPBC 2011/5995)



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Rev	Rev Date	Author / Editor	Amendment
A	29/04/2026	PK Lim	Issued for Review
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1. INTRODUCTION

1.1 Overview

This report addresses compliance with each of the conditions of the Coniston/Novara Field Development Project, Western Australia approval EPBC 2011/5995.

Specifically, this report has been prepared to meet the requirements of Condition 3 of EPBC 2011/5995:

Within three months of every 12-month anniversary of the commencement of the action, the person taking the action must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of any management plans as specified in the conditions. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of this approval must be provided to the department at the same time as the compliance report is published.

The approved action commenced on 3 February 2013 (Novara) & 14 February 2013 (Coniston). This is the eleventh annual compliance report for EPBC 2011/5995 and covers the period 3 February 2024 to 3 February 2025 (referred to herein as the '2024-2025 reporting period').

The report has been prepared in accordance with the Department of the Environment 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**.

Abbreviation	Description
DAFF (prev. DAWE)	Department of Agriculture, Fisheries and Forestry Department of Agriculture Water and Environment (formerly Department of the Environment and Energy)
DCCEEW (prev. DSEWPAC)	Department of Climate Change, Energy, the Environment and Water 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

Abbreviation	Description
OSCP	Oil Spill Contingency Plan
OSMP	Operational and Scientific Monitoring Program

1.1 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	 <p>Signed by: <i>Ian Antao</i> <small>39B84705807C4C4...</small></p>
Full name	Ian Antao
Position	Asset Manager – Ningaloo Vision
Organisation	Santos WA Energy Limited (ABN 39 009 301 964)
Date	30 April 2026

2. Approved Action

2.1 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 (now DCCEEW) 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 2-1: 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 2024 to 3 February 2025

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.

2.2 Description of Activities

2.2.1 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 2-1).

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 2-1) 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 2-2). 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/>

2.2.2 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.

For the period under review, the Ningaloo Vision hub decommissioning project planning is currently underway, which will determine the method of recovery of the flowlines together with remaining sub-sea infrastructure.

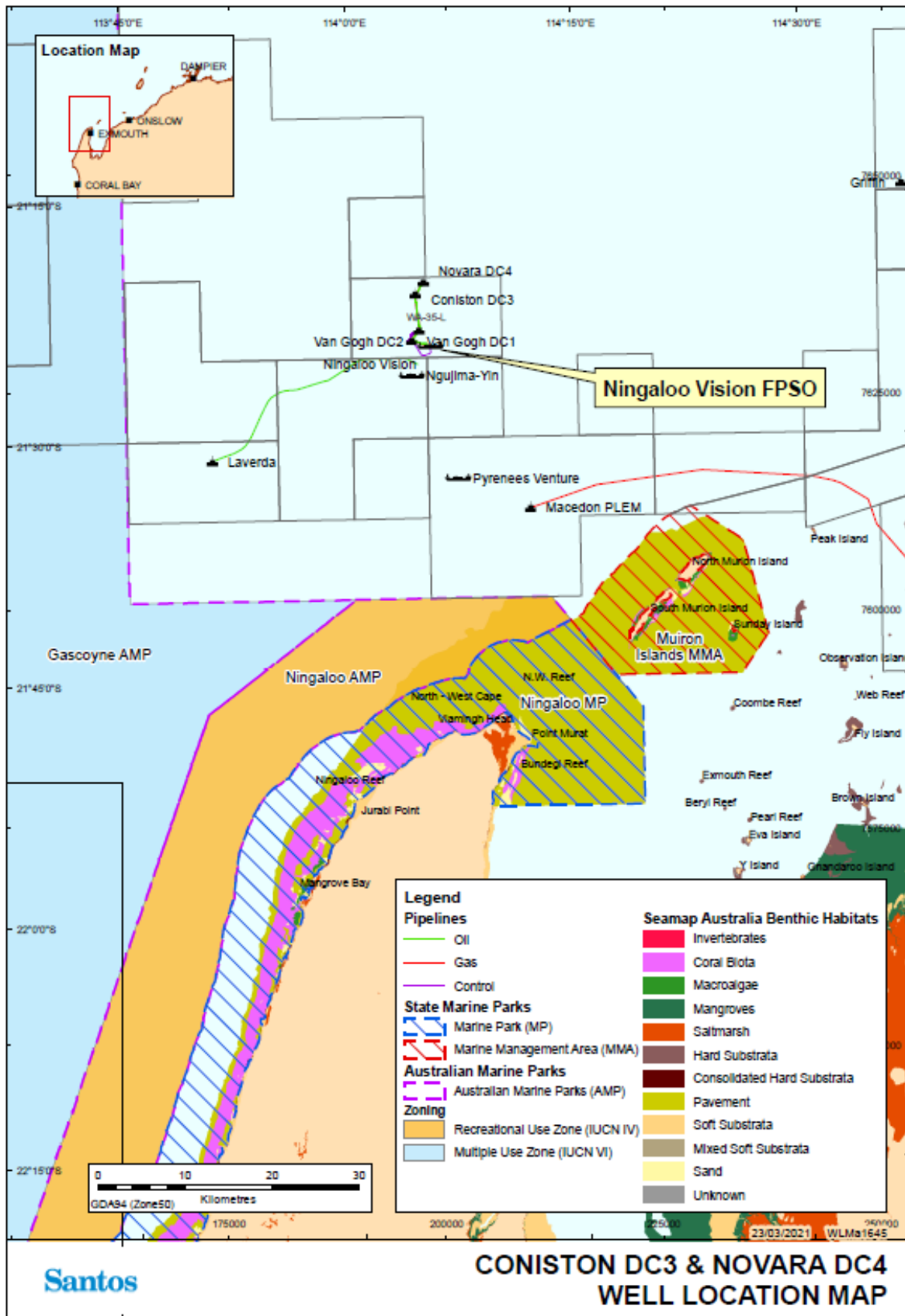


Figure 2-1: Coniston/Novara Field Location Map

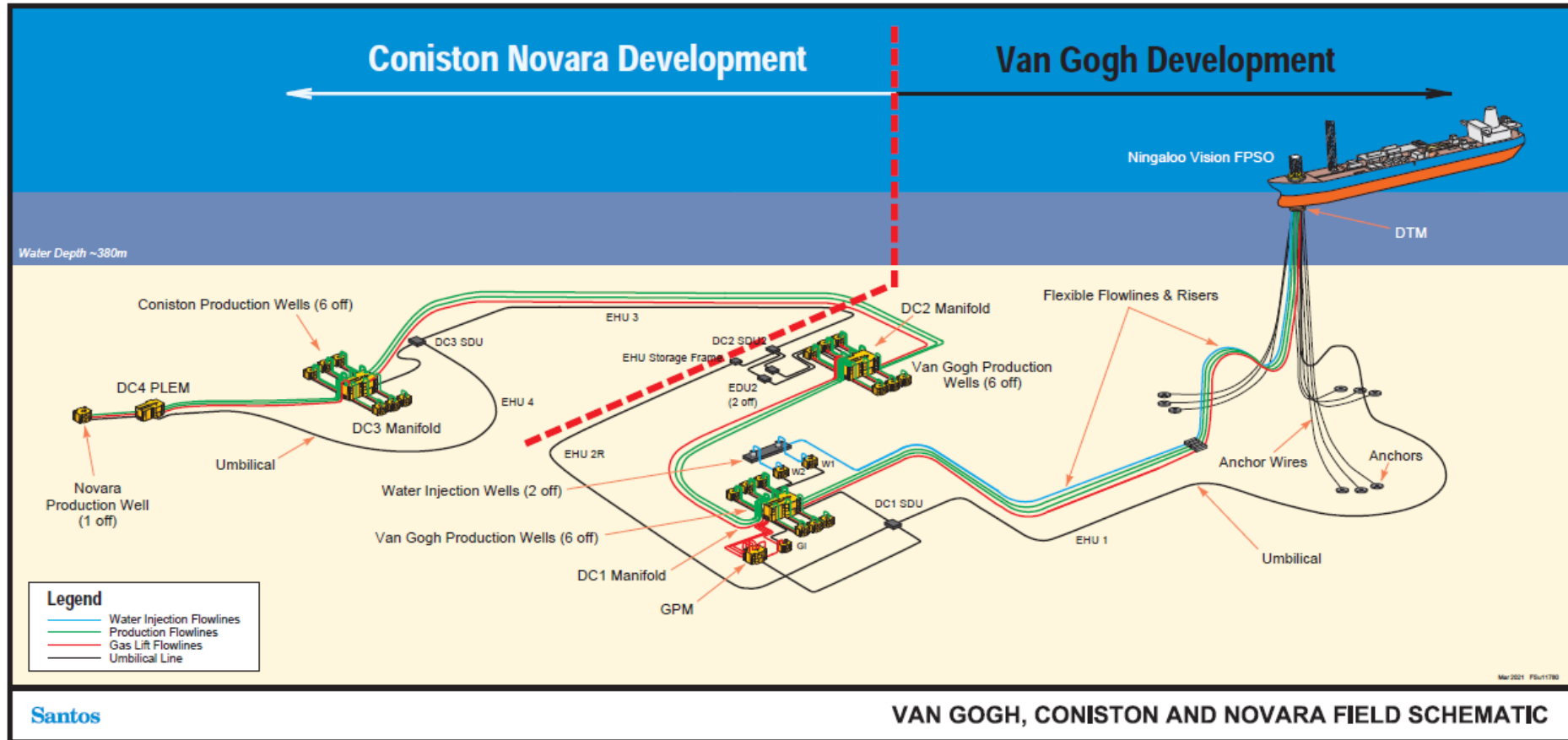


Figure 2-2: Schematic of the Coniston/Novara Development (including DC3 and DC4) and existing infrastructure of the Van Gogh Operation (including Ningaloo Vision FPSO, DC1 and DC2)

2.2.3 Activities Undertaken for the Coniston/Novara Development during the 2024-2025 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.

Annual survey of Coniston Novara hydrocarbon containing assets in March 2024 by the Sapura Constructor found no signs of hydrocarbon release.

The Ningaloo Vision Cessation of Production and Floating Asset Removal Environment Plan and supporting OPEP was submitted to and approved by NOPSEMA on 23 December 2024.

3. Compliance Assessment

3.1 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 2024-2025 reporting period. These sources of information are discussed in the following sub-sections.

3.1.1 Incident Response Exercises

Santos WA undertook two (2) spill exercises on the Ningaloo Vision FPSO during the 2024 – 2025 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 Emergency Response Plan (TV-22-IF-00005, 404-OP-ERP-001).

In addition, Santos WA undertakes an annual deployment exercise (Exmouth) to respond to a simulated oil spill incident in the region. This exercise was conducted in August 2024 and served to test operator response capability, to ensure familiarity with processes, and functionality of oil spill response equipment identified to support NV in the event of an incident.

Santos WA also undertakes an annual major spill (Level 3) exercise each year where the office-based Incident Management Team (IMT) are activated to respond to a simulated major oil spill from any 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 Level 3 exercise was held on 13 November 2024 and was based on one of the credible spills' scenarios based on a Santos in-force OPEPS, Barossa Production Operations Oil Pollution Emergency Plan (BAS-210 0134)

3.1.2 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 2024-2025 reporting period, an environmental audit was carried out 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 completed during the reporting period did not identify any non-compliance with any EPBC condition and matters of national environmental significance.

Table 3-1: Environmental Audits and Inspections Conducted during the 2024-2025 reporting period.

Date	Facility / Vessel	Audit / Inspection Type	Audit / Inspection Criteria
Oct-Dec 2024	NV FPSO	Ningaloo Vision Environment Plan Annual Audit	The audit was conducted within Santos Offices and assessed compliance with performance standards and specific elements to the EP.
Ongoing	Offshore Support Vessels	Pre-mobilisation and monthly 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).

3.1.3 Environmental Audits Inspections Conducted by Regulators

During the reporting period, no environmental audits/ inspections were carried out by regulators.

3.2 Compliance Designations

In accordance with the department’s Guidelines, **Table 3-2** describes the compliance designations used in this report.

Table 3-2: 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 2024-2025 reporting period. For example, a condition which applies to an activity that has not yet commenced.

3.3 2024 - 2025 Compliance Summary

Santos WA Energy’s compliance with EPBC 2011/5995 for the 2024-2025 reporting period can be summarised as follows:

- Compliant: 8 conditions.
- Non-compliant: 0 condition.
- Not Applicable: 6 conditions.

Table 3-3 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 2024-2025 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 2024-2025 reporting period.</p> <p>Based on the above, Santos WA Energy considers that Condition 1 was not applicable during the 2024-2025 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 <i>Oil Pollution Emergency Plan</i> (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 3.1). The corrective and preventative actions arising from these audits and inspections are managed using an online tracking system (EHS Toolbox) 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 2024-2025 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 2024-2025 reporting year.</p>
3	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	Compliant	<p>The approved action commenced on 03 February 2013; therefore, annual compliance reports for EPBC 2011/5995 must be published by 03 May each year.</p> <p>Santos WA Energy published its annual compliance report for EPBC 2011/5995 for 2023-2024 on 3 May 2023 available at: 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 2024-2025 reporting year.</p> <p>(This 2024-2025 report is overdue and will be reported as a non-compliance in the 2025 – 2026 report.)</p>

Condition Number	Condition	Compliance Status	Evidence/Comments
	department at the same time as the compliance report is published.		
4	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.	Not Applicable	<p>Activities during the 2024-2025 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 2024-2025 reporting period.</p> <p>Based on the above, Santos WA Energy considers that Condition 4 was not applicable during the 2024-2025 reporting year.</p>
5	If the Minister believes that it is necessary or convenient for the better protection of World Heritage properties (sections 12 & ISA), National Heritage places (sections 158 & 15C), Listed threatened species and communities (sections 1.8 & 1.8A, Listed migratory species (sections 20 & 20A) and/or Commonwealth marine areas (sections 23 & 24A), the Minister may request that the person taking the action make specified revisions to the plan or program specified in the conditions and submit the revised plan or program for the Minister's written approval. The person taking the action must comply with any	Not Applicable	<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 2024-2025 reporting period.</p> <p>Based on the above, Santos WA Energy considers that Condition 5 was not applicable during the 2024-2025 reporting year.</p>

Condition Number	Condition	Compliance Status	Evidence/Comments
	such request. The revised approved plan or program must be implemented.		
6	If, at any time after 5 years from the date of this approval, the person taking the action has not substantially commenced the action, then the person taking the action must not substantially commence the action without the written agreement of the Minister.	Not Applicable	<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 2024-2025 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 2024 to 3 Feb 2025, the following Ningaloo Vision OPEPs were available on the Santos Ltd website under Public Notifications (https://www.santos.com/about-us/corporate-governance/public-notices/).</p> <ul style="list-style-type: none"> • Ningaloo Vision Operations OPEP (in force up to 23 Dec 2024) • Ningaloo Vision Cessation of Operations and Floating Asset Removal (COPFAR) OPEP (approved on 24 Dec 2024) <p>The conditions of EPBC 2011/5995 also refer to a Decommissioning Plan (Condition 14). As required following NOPSEMA audit (2022), this VGCN Decommissioning Plan was submitted to NOPSEMA on 31st January 2023.</p> <p>Based on the above, Santos WA Energy considers that it was compliant with Condition 7 during the 2024-2025 reporting year.</p>
8	The Exmouth Gulf must not be used by support vessels during the period 15 September to 31 October.	Not Applicable	This condition is not applicable for the 2024-2025 reporting period as there were no construction/drilling activities associated with Coniston Novara Field Development project during this period.
9	The person taking the action must implement cetacean and Whale shark (<i>Rhincodon typus</i>) interaction procedures for supply vessels and aircraft that are used to carry out the action, through all stages of the action from commencement. These procedures must be consistent with	Compliant	Vessels and aircraft contracted to Santos WA implement the <i>Protected Marine Fauna Interaction and Sighting Procedure</i> (EA-91-II-00003) which is consistent with Part 8 of the Environment Protection and Biodiversity Conservation Regulations 2000 and includes reporting of cetacean sightings to the Department of Agriculture, Fisheries and Forestry (DAFF) (formerly Department of Agriculture, Water and Environment).

Condition Number	Condition	Compliance Status	Evidence/Comments
	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.		Based on the above, Santos WA Energy considers that it was compliant with Condition 9 during the 2024-2025 reporting year.
10	The person taking the action must develop and submit to the Minister for approval, an Oil Spill Contingency Plan (OSCP) that demonstrates the response preparedness of the person taking the action for any spills, including from offshore wells and infrastructure, pipelines, construction and operation vessels. This must include the capacity to respond to a spill and mitigate the environmental impacts on World and National heritage values, the Commonwealth marine area and species listed as threatened or migratory under the EPBC Act. The OSCP must include, but is not limited to:	Compliant	<p>Ongoing operations from the Coniston and Novara Development are managed under approved Ningaloo Vision Environment Plans and their supporting OPEPs. The OPEPs can be found on the Santos Ltd website. (https://www.santos.com/about-us/corporate-governance/public-notice/).</p> <p>The versions of the OPEPs available on the Santos Ltd website during the reporting period addresses the separate criteria of Condition 10 specifically as follows below.</p> <p>Based on the respective sections of the OPEP referenced below, Santos WA Energy considers that it was in compliance with Condition 10 during the 2024-2025 reporting year.</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><u>Ningaloo Vision Operations OPEP</u></p> <p>Section 10.4 <i>Oil Spill Trajectory Modelling</i> and 10.8 <i>Shoreline Clean-up Assessment</i></p> <p><u>Ningaloo Visions COPFAR OPEP</u></p> <p>Section 10.4 <i>Oil Spill Trajectory Modelling</i>, 14. <i>Shoreline Protection and Deflection Plan</i> and 15. <i>Shoreline Clean-up Plan</i></p>
	b) Specific response measures for those sensitive areas, species or habitats and prioritisation of those areas during a spill		<p><u>Ningaloo Vision Operations OPEP</u></p>

Condition Number	Condition	Compliance Status	Evidence/Comments
	response, including a net environmental benefit analysis of the response options;		<p>Section 10.4 <i>Oil Spill Trajectory Modelling</i> and 6.8 <i>Net Environmental Benefit Analysis (NEBA)</i></p> <p><u>Ningaloo Visions COPFAR OPEP</u></p> <p>Section 10.4 <i>Oil Spill Trajectory Modelling</i> and 6.6 <i>Net Environmental Benefit Analysis (NEBA)</i></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><u>Ningaloo Vision Operations OPEP</u></p> <p>10 c), d)</p> <p>Sections:</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>9 – <i>Source Control Plans</i></p> <p>10 – <i>Monitor and Evaluate Plan</i></p> <p>11 – <i>Containment and Recovery Plan</i></p> <p>12 – <i>Mechanical Dispersion Plan</i></p> <p>13 – <i>Chemical Dispersant Application Plan</i></p> <p>14 – <i>Shoreline Protection and Deflection Plan</i></p> <p>15 – <i>Shoreline Clean-up Plan</i></p> <p>16 – <i>Oiled Wildlife Response Plan</i></p> <p>17 – <i>Waste Management Plan</i></p> <p><u>Ningaloo Visions COPFAR OPEP</u></p> <p>10 c), d)</p> <p>Sections:</p> <p>9 – <i>Source Control Plans</i></p>

Condition Number	Condition	Compliance Status	Evidence/Comments
			10 – Monitor and Evaluate Plan 11 – Mechanical Dispersion Plan 12 – Chemical Dispersant Application Plan 13 – Offshore Containment and Recovery Plan 14 – Shoreline Protection and Deflection Plan 15 – Shoreline Clean-up Plan 16 – Oiled Wildlife Response Plan 17 – Operational Scientific Monitoring 18 – Waste Management Plan
	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;		<u>Ningaloo Vision Operations OPEP</u> Section 5.4 – <i>Cost Recovery</i> <u>Ningaloo Visions COPFAR OPEP</u> Section 5.3 – <i>Cost Recovery</i>
	f) Training of staff in spill response measures and identifying roles and responsibilities of personnel during a spill response;		<u>Ningaloo Vision Operations OPEP</u> Section - 5.5 <i>Training and Exercises</i> <u>Ningaloo Visions COPFAR OPEP</u> Section - 5.4 <i>Training and Exercises</i>
	g) Procedures for reporting spill incidents to the department; and		<u>Ningaloo Vision Operations OPEP</u>

Condition Number	Condition	Compliance Status	Evidence/Comments
			<p>Section 7 <i>External Notifications and Reporting Procedures</i></p> <p><u>Ningaloo Visions COPFAR OPEP</u></p> <p>Section 7 <i>External Notifications and Reporting Requirements</i></p>
	<p>h) A demonstrated procedure for testing, maintenance and review of the OSCP.</p>		<p><u>Ningaloo Vision Operations OPEP</u></p> <p>Section 5.5.3 – <i>Response Testing Arrangements and Audits</i></p> <p>Section 20.1 – <i>Document Review and Revision</i></p> <p><u>Ningaloo Visions COPFAR OPEP</u></p> <p>Section 5.5 – <i>Response Testing Arrangements and Audits</i></p> <p>Section 3.8 – <i>Document Review and Revision</i></p>
	<p>The OSCP must be submitted at least three months prior to the commencement of the action, or as otherwise agreed to in writing by the Minister. The person taking the action must not commence the action until the OSCP is approved by the Minister. The approved OSCP must be implemented.</p> <p>Note: If a legal requirement is held by the proponent that requires submission of a plan that meets the above requirements, that plan may be submitted for the purpose of this condition.</p>		<p>The commencement date for the approved action was 03 February 2013. Therefore, this component of Condition 10 did not apply during the 2024-2025 reporting period.</p>

Condition Number	Condition	Compliance Status	Evidence/Comments
11	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:	Compliant	<p>Ongoing operations from the Coniston and Novara Development are managed under the Ningaloo Vision Environment Plans and supporting OPEPs. The OPEPs outlines the operational and scientific arrangements that their will be implemented in the event of a spill.</p> <p>The OPEPs addresses Condition 11 specifically as follows below.</p> <p>Based on the respective sections of the OPEP referenced below, Santos WA Energy considers that it was in compliance with Condition 11 during the 2024-2025 reporting year.</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><u>Ningaloo Vision Operations OPEP</u></p> <p>Section 10 – <i>Monitor & Evaluate Plan</i> and Appendix N – <i>Scientific Monitoring Plans</i>.</p> <p><u>Ningaloo Visions COPFAR OPEP</u></p> <p>Section 10 – <i>Monitor & Evaluate</i> and Appendix N – <i>Scientific Monitoring Capability</i>.</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><u>Ningaloo Vision Operations OPEP</u></p> <p>Section 10 – <i>Monitor & Evaluate Plan</i> and Appendix N – <i>Scientific Monitoring Plans</i>.</p> <p><u>Ningaloo Visions COPFAR OPEP</u></p> <p>Section 10 – <i>Monitor & Evaluate</i> and Appendix N – <i>Scientific Monitoring Capability</i>.</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><u>Ningaloo Vision Operations OPEP</u></p> <p>Section 5.4 – <i>Cost Recovery</i>.</p>

Condition Number	Condition	Compliance Status	Evidence/Comments
	environmental damage arising from potential spills;		<p><u>Ningaloo Visions COPFAR OPEP</u> Section 5.3 – <i>Cost Recovery</i>.</p>
	d) Inclusion of sufficient baseline information on the biota and the environment that may be impacted by a potential spill, to enable an assessment of the impacts of such a spill. This must include sufficient information to determine the impact on the Whale shark population that feeds in the Ningaloo Marine World Heritage Area, including the reliance of this population of Whale sharks on coral spawning in the World Heritage Area as opposed to other food sources.		<p><u>Ningaloo Vision Operations OPEP</u> Section 18 – <i>Scientific Monitoring Plan</i> and Appendix N – <i>Scientific Monitoring Plans</i>.</p> <p><u>Ningaloo Visions COPFAR OPEP</u> Section 17 – <i>Operational and Scientific Monitoring</i> and Appendix N – <i>Scientific Monitoring Capability</i>.</p>
	e) A strategy to implement the scientific monitoring plan, including timelines for delivery of results and mechanisms for the timely peer review of studies; and		<p><u>Ningaloo Vision Operations OPEP</u> Section 18 – <i>Scientific Monitoring Plan</i> and Appendix N – <i>Scientific Monitoring Plans</i>.</p> <p><u>Ningaloo Visions COPFAR OPEP</u> Section 17 – <i>Operational and Scientific Monitoring</i> and Appendix N – <i>Scientific Monitoring Capability</i>.</p>
	f) Provision for periodic review of the program.		<p><u>Ningaloo Vision Operations OPEP</u> 18.5 <i>Baseline Monitoring</i></p> <p><u>Ningaloo Visions COPFAR OPEP</u> 3.8 <i>Document Review</i></p>

Condition Number	Condition	Compliance Status	Evidence/Comments
	<p>The OSMP must be submitted at least three months prior to the commencement of the action, or as otherwise agreed in writing by the Minister. The person taking the action must not commence the action until the OSMP is approved by the Minister. The approved OSMP must be implemented.</p> <p>Note: If a legal requirement is held by the proponent that requires submission of a plan that meets the above requirements, that plan may be submitted for the purpose of this condition.</p>		<p>The commencement date for the approved action was 03 February 2013. Therefore, this component of Condition 11 did not apply during the 2024-2025 reporting period.</p>
12	<p>In the event of a spill, the person taking the action must pay all costs associated with:</p> <p>a) All operational and scientific monitoring undertaken in response to the spill, as outlined in the OSMP approved by the Minister under Condition 11;</p> <p>b) any environmental management and remediation and/or equivalent determined necessary by the results of the OSMP.</p>	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 completed an Insurance Assurance review in February 2023 and 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 2024-2025 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.</p>

Condition Number	Condition	Compliance Status	Evidence/Comments
			Santos WA Energy considers that it was in compliance with Condition 13 during the 2024-2025 reporting year.
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	The facility is still in the operational phase, so Condition 14 did not apply during the 2024-2025 reporting period.