

Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L6284/1992/10	Licence file number:	DER2013/000949-3
Licence holder:	Santos WA Energy Limited		
Trading as:	Santos WA Energy Limited		
ACN:	009 301 964		
Registered address:	60 Flinders Street, Adelaide SA 5000		
Reporting period:	01 / 07 / 2021 to 30 / 06 / 2022		
Section B – Statement of Compliance with Licence Conditions			
Did you comply with all of your licence conditions during the reporting period? (please tick the appropriate box)			
<input type="checkbox"/> Yes – please complete: <ul style="list-style-type: none"> • section C; • section D if required; and • sign the declaration in Section F. 			
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none"> • section C; • section D if required; • section E; and • sign the declaration at Section F. 			
Section C – Statement of Actual Production			
Provide the actual production quantity for this reporting period. Supporting documentation is to be attached (See Appendix C.2).			
Prescribed Premises Category		Actual Production Quantity	
Category 10: Oil or gas production from wells			
Approved production/design capacity		7,050,000 tonnes per annual period	
Established production		1,884,966 tonnes	
Category 34: Oil and gas refining			
Approved production/design capacity		7,050,000 tonnes per annual period	
Established production		0	
Section D – Statement of Actual Part 2 Waste Discharge Quantity			
Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached (See Appendix C.2).			
Prescribed Premises Category		Actual Part 2 Waste Discharge Quantity	
Category 85: Sewage facility			
Approved production/design capacity		72 cubic metres per day	
Established production		34.84 cubic metres per day	

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	Condition 9 (b)	Date(s) of non-compliance:	July – Sep 2021
Details of non-compliance:			
<p><i>Condition 9 (b) - The licence holder must monitor and record emissions listed in Table 9: for the corresponding parameter.</i></p> <p>Condition 9 (b) Q1 sampling did not include sampling/analysis for metals, in-field free chlorine and surfactants. Failure to monitor all parameters during Q1 in accordance is non-compliance with condition 9(b)</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>The primary water quality data collected during the reporting period was confirmed to be within acceptable ranges when compared to the adopted trigger criteria. These results confirm that the WWTP has been operating within an expected and acceptable range. As such the omission of sampling/analysis for metals, in-field free chlorine and surfactants samples is not likely to have any impact on the environment.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Santos failed to engage a suitably experienced consultant to complete the sampling in accordance with Condition 9 (b). This non-compliance resulted from a change in entity engaged to undertake the WWTP sampling. The quarterly WWTP sampling scope was recently paired with another scope with the intention of streamlining the overall workflows. Upon review, the combined scope was likely too onerous on the contracted entity.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Information and guidance on water quality sampling expectations was initially provided to the sampling entity and is included in the Varanus Island Wastewater Monitoring Method Statement (EA-00-RI-10058.08).</p> <p>Santos has since engaged an alternative specialist contractor to undertake ongoing WWTP sampling and reporting as required by L6284. The new sampling entity was selected based on suitable past work experience and available trained staff who are familiar with sampling under AS/NZS 5667.1. It is expected that based on this change the risk of further non-compliances with the licence is greatly reduced.</p>			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Section E – Details of Non-Compliance with Licence Condition

Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.

Condition no:	Condition 9 (c)	Date(s) of non-compliance:	Sep – Dec 2021
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Details of non-compliance:

Condition 9 (c) - The licence holder must monitor and record emissions listed in Table 9: at the corresponding frequency.

Condition 9 (c) of the licence requires wastewater sampling to be undertaken on a quarterly frequency. The quarter 2 sampling event (Sep-Dec 2021) was not undertaken during the 2021-22 reporting period.

What was the actual (or suspected) environmental impact of the non-compliance?

NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.

The wastewater treatment plant was decommissioned, and a new activated sludge bioreactor (ASBR) type wastewater treatment plant (WWTP) was installed and commissioned in 2021 under W6266/2019/1. The upgraded ASBR type WWTP operated in compliance with design specifications during the commissioning period (Table 4-1 of the VI WWTP Upgrade Commissioning Report for W6266/2019/1 presented below) and was subsequently included on the L6284 Licence in Nov-2021. The new WWTP has operated in a stable state since it was installed and commissioned. There have been no major fluctuations with the number of people at the Varanus Island facility during the reporting period, and in particular during the Q2 period, and no exceedances of the sewage discharge limit required under Condition 8. As such Santos considers there was no environmental impact associated with this non-compliance.

Table 4-1: Laboratory Data Compliance with Works Approval W6266/2019/1

Parameter	Unit	Target	14/04/2021	19/05/2021	16/06/2021
pH (In-field) ¹	pH Units	8.0 – 8.4	7.91	7.66	7.99
pH (Lab) ¹	pH Units	8.0 – 8.4	8.2	7.9	8.3
BOD ²	mg/L	< 20	< 5	< 5	< 5
Total Nitrogen	mg/L	< 50	10	10	1.6
Total Phosphorus	mg/L	< 12	4.4	2.8	0.70
TSS	mg/L	< 30	5	< 2	4
TDS	mg/L	N/A	700	530	770
Free Chlorine (In-field)	mg/L	0.2 - 2.0	0.51	0.60	0.60
Free Chlorine (Lab) ³	mg/L	0.2 - 2.0	< 0.1	< 0.1	< 0.1
<i>E. Coli</i>	CFU/100mL	< 10	-	< 10	< 10
Anionic surfactants	mg/L	< 5	< 0.05	< 0.05	< 0.05
Oil and grease	mg/L	< 10	< 5	< 5	< 10

Department of Water and Environmental Regulation

Cause (or suspected cause) of non-compliance:	
The Quarter 2 sampling event was not completed due to logistical constraints in relation to the mobilisation of specialist contractors to Varanus Island. These constraints were due to a combination of COVID-19 travel restrictions and COVID infection management on Varanus Island.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
The scheduling of the quarterly WWTP sampling was realigned to occur earlier in the quarterly sampling window. This action provided additional contingency time to manage unforeseen delays from Covid and logistical constraints. Subsequent sampling events during the reporting period were successfully completed.	
Was this non-compliance previously reported to DWER?	
<input type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input type="checkbox"/> Reported to DWER in writing	Date: / /

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	Condition 9 (f)	Date(s) of non-compliance:	22-Sep-2021 16-Feb-2022 01-Jun-2022
Details of non-compliance:			
<p><i>Condition 9 (f) - The licence holder must monitor and record emissions listed in Table 9: using the corresponding method.</i></p> <p>Condition 9 (f) requires sampling to be undertaken in accordance with Australian Standards AS/NZS 5667.1. Quality assurance/ quality control (QAQC) samples, as required by AS/NZS 5667.1, were not collected and analysed during the Q1, Q3 and Q4 monitoring events. AS/NZS 5667.1 requires a duplicate sample to be tested at a rate of 1:20 samples or one duplicate per sampling day.</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>The primary water quality data collected during the reporting period was confirmed to be within acceptable ranges when compared to the adopted trigger criteria. These results confirm that the WWTP has been operating within an expected and acceptable range. As such the omission of QAQC samples is not likely to have any impact on the environment.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Santos failed to engage a suitably experienced consultant to complete the sampling in accordance with Condition 9 (f). This non-compliance resulted from a change in entity engaged to undertake the WWTP sampling. The quarterly WWTP sampling scope was recently paired with another scope with the intention of streamlining the overall workflows. Upon review, the combined scope was likely too onerous on the contracted entity. This combined with the contractors relative inexperience with the QAQC samples required by AS/NZS 5667.1 has resulted in non-compliance with Condition 9 (f).</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Information and guidance on water quality sampling expectations was initially provided to the sampling entity and is included in the Varanus Island Wastewater Monitoring Method Statement (EA-00-RI-10058.08).</p> <p>Santos has since engaged an alternative specialist contractor to undertake ongoing WWTP sampling and reporting as required by L6284. The new sampling entity was selected based on suitable past work experience and available trained staff who are familiar with sampling under AS/NZS 5667.1. It is expected that based on this change the risk of further non-compliances with the licence is greatly reduced.</p>			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Section F – Declaration			
I/We declare that the information in this Annual Audit Compliance Report is true and correct and is not false or misleading in a material particular ¹ . I/We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.			
Signature ² :		Signature:	
Name: (printed)		Name: (printed)	
Position:	Production Manager	Position:	
Date:	18/01/2023	Date:	
Seal (if signing under seal):			

¹ It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular.

² AACRs can only be signed by the licence holder or an authorised person with the legal authority to sign on behalf of the licence holder.