

ANNUAL RETURN

Information on this form is required in accordance with the conditions of your licence issued under the *Waste Management and Pollution Control Act 1998*

Failure to provide the information requested and/or the provision of false or misleading information is an offence under the legislation and you may be liable for heavy penalties.

Section 1. Licence Details

LICENCE NUMBER	EPL217 - 03	REPORTING PERIOD	19 September 2023 - 18 September 2024
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Please check your contact details including 24 hour emergency contact in [NT EPA online](#) and update if necessary. The NT EPA website will be updated using the details provided online.

Were the contact details correct? YES / NO

Section 2. Statement of Compliance

Were all conditions of the licence complied with during the reporting period? YES / NO

If Yes, proceed to Section 4. If not, complete the table below (add more rows if required)

Details of Non-compliance				
Condition number	Date of non-compliance (dd/mm/yy)	Was NT EPA notified? (Yes / No)	If yes, date NT EPA notified (dd/mm/yy)	If yes, how was NT EPA notified? (e.g. phone, email, Pollution Hotline)
		If no, complete Section 3		
44 & 77.2	07/08/2024	Yes	29/08/2024	Email
44 & 77.2	07/08/2024	Yes	29/08/2024	Email
44 & 77.2	14/02/2024	Yes	28/08/2024	Email
44 & 77.2	03/07/2024	Yes	22/08/2024	Email
44 & 77.2	04/10/2023	No	Refer to section 3	Refer to section 3

Section 3. Report of Non-compliance

Please supply the following details for each non-compliance not reported to the NT EPA identified in Section 2. Use a separate page for each non-compliance.

The date and time of the non-compliance.

A sample of the irrigation flowing stream (sample point 1SC-2919) was taken on 04/10/2023, which shows exceedances of ammonia nitrogen and nitrate which are greater than three times the trigger level value defined in Table 2 Appendix B of EPL217 - 03.

When the non-compliance was detected and by whom.

The non-compliance was detected by the Senior Environmental Advisor on 19/09/2024 during the preparation of the 2024 Annual Return.

The non-compliance was documented in the Darwin LNG Annual Environmental Monitoring Report (1 January 2023 – 31 December 2023), which was submitted to the NT EPA on 1 March 2024. Refer to Table 3-1 Summary of irrigation water quality results [[ntepa.nt.gov.au/ data/assets/pdf file/0009/1354707/epl217-03-santos-dlng-annual-environmental-monitoring-report-2023.pdf](https://ntepa.nt.gov.au/data/assets/pdf_file/0009/1354707/epl217-03-santos-dlng-annual-environmental-monitoring-report-2023.pdf)].

Santos has reviewed the history of non-compliance reporting, and no records were available to demonstrate that this non-compliance was notified to the NT EPA at the time of occurrence as per Condition 75 of EPL213 - 03.

The actual and potential causes and contributing factors to the non-compliance.

Total nitrogen for the same sample was recorded as 3.01 mg/L and in compliance with the 40 mg/L trigger value. The trigger values for the speciated nutrients (ammonia nitrogen, nitrate and nitrite) are set at a level that is disproportionate (0.02, 0.017 and 0.017 mg/L respectively) to that of total nitrogen and therefore in Santos' view, the inclusion of very low trigger values for speciated nutrients in the EPL is the primary cause of the non-compliance.

There has been no history of the non-compliance being reported to the NT EPA at the time of occurrence. As part of a cross-referencing task undertaken by the Senior Environmental Adviser, Santos identified that there was an exceedance reported in the Darwin LNG Annual Monitoring Report.

Santos will ensure that all exceedances of trigger values (which trigger Condition 77 of EPL217 - 03) are reported within 24 hours to the NT EPA.

The risk of environmental harm arising from the non-compliance.

Groundwater monitoring data, statistical assessments and evidence from other inter-related monitoring programs for the DLNG site demonstrate that irrigation practices present a low environmental risk:

Groundwater monitoring data – The groundwater monitoring data collected from the DLNG facility since 2015 demonstrates that current irrigation practices present a low environmental risk, and there is no correlation showing a worsening of water quality between the irrigation water and groundwater.

For instance, as detailed in the 2023 Annual Environmental Monitoring Report (AEMR) (Section 3.1.7), the latest groundwater monitoring results for the DLNG site did not indicate any linkages between

nutrient trends in irrigation water quality and groundwater quality. Accordingly, impacts to the receiving environment as a result of the non-compliance are likely to be negligible.

Statistical assessments – Statistical assessments (refer to the AEMRs) comparing the groundwater and irrigation water parameters using the Mann Kendal analysis have identified no correlation between the irrigation water discharges and the quality of groundwater. These assessments demonstrate that current irrigation practices have not adversely affected groundwater quality. The condition of the groundwater is considered in good health as determined by the long-term groundwater monitoring results.

Interrelated monitoring programs – This is supported by the positive findings from inter-related monitoring programs including the jetty outfall program and mangrove monitoring program as detailed in the AEMRs.

The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.

Wastewater discharges at the DLNG site have ceased, meaning that there is no ongoing exceedance of the trigger values due to wastewater discharges. Accordingly, no steps are required to mitigate or remediate environmental harm. With this said, out of an abundance of caution, Santos is implementing (or has implemented) the following measures to ensure future compliance with the EPL and to mitigate the risk of environmental harm occurring in the future:

- (a) **Installation of new STP** – Santos installed a new Sequencing Batch Reactor (SBR) STP utilising improved treatment technology and with improved reliability, which commenced commissioning on 15 November 2023. Weekly sampling and laboratory analysis during the commissioning period has been conducted to assist in optimising the performance of the STP.
- (b) **Wastewater specialist** – Santos has engaged a wastewater specialist consultant during the commissioning period to assist with the management of the STP as well as provide additional training for DLNG operators.
- (c) **Licence amendment** – Santos is intending to seek an amendment of the Trigger Values in the EPL as soon as practicable.

Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.

The disposal of wastewater by irrigation at the DLNG site has ceased under direction of the Santos General Manager – Darwin to ensure no further non-compliances with Condition 44. Therefore, the risk of further contravention has been eliminated.


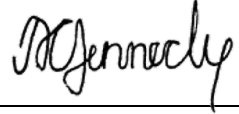
Santos acknowledges that this been a longstanding issue, and has previously engaged with the NT EPA to seek amendment of the trigger values. Santos intends to promptly make a further application to amend the EPL to replace the current trigger values with values that are more suitable.

Santos has and is taking action to further reduce risks of harm from wastewater at the DLNG site in the medium to long-term, which are set out in the section above.

If no action was taken, why no action was taken.

Not applicable.

Section 4. Signature and Certification

This declaration must only be signed by a person(s) with the legal authority to sign it. The ways in which the application may be signed, and the people who may sign the application, are set out in the categories below.			
If the licence holder is:	Check	The application must be signed and certified by one of the following:	
An individual	<input type="checkbox"/>	The individual.	
A partnership	<input type="checkbox"/>	A partner.	
A company	<input type="checkbox"/>	The common seal being affixed in accordance with the <i>Corporations Act</i> , or	
	<input type="checkbox"/>	Two directors, or	
	<input checked="" type="checkbox"/>	A director and a company secretary, or	
	<input type="checkbox"/>	If a proprietary company that has a sole director who is also the sole company secretary – by that director.	
A public authority	<input type="checkbox"/>	The Chief Executive Officer (CEO) of the public authority, or	
	<input type="checkbox"/>	By a person delegated to sign on the public authority's behalf in accordance with its legislation (Please note: a copy of the relevant instrument of delegation must be attached to this application).	
I/We hereby declare that the information provided in this Annual Return and accompanying documents is to the best of my/our knowledge, true and correct.			
Signature		Signature	
Name (printed)	Anthea McKinnell	Name (printed)	Amelia Senneck
Position	Director Santos NA Darwin Pipeline Pty Ltd	Position	Company Secretary Santos NA Darwin Pipeline Pty Ltd
Date	10/10/2024	Date	11/10/2024
Seal (if signing under seal):			

Return the completed signed form to environmentalregulation@nt.gov.au