

Western Surat Gas Project EPBC 2015-7469

Annual Compliance Report Nov 2023 – Nov 2024

Date: 7 November 2024

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Document Status

Revision History

Revision	Release Date	Document Status	Revision Comments
A			For review
0	7 November 2024	Final	For distribution to DCCEEW and upload to Senex website

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: John Anderson

John Anderson (Nov 7, 2024 14:06 GMT+10)

Full name: John Anderson

Position: Acting Chief Commercial Officer

Organisation: Stuart Petroleum Cooper Basin Pty Ltd, ACN: 130 588 055

Date: 07-Nov-2024

Introduction

Stuart Petroleum Cooper Basin Gas Pty Ltd (ACN 130 588 055) is developing the Western Surat Gas Project (WSGP) in south-central Queensland (**Error! Reference source not found.**). The approved action (EPBC 2015-7469) is to develop 425 production wells, undertaking a staged drilling program. Supporting infrastructure approved as part of the project includes:

- gas and water gathering networks;
- gas field compression facilities and a central processing facility;
- medium pressure infield and sales gas pipelines;
- a central processing plant; water storage and treatment facilities; and
- other associated and ancillary facilities.

Relevant project details for the approved action are provided in Table 1.

Table 1: WSGP Project Details

Approved Action Details	
Title of the Action	Stuart Petroleum Cooper Basin Gas Pty Ltd Western Surat Gas Project, NE of Roma, Queensland (EPBC 2015/7469)
Person to whom the approval is granted	Stuart Petroleum Cooper Basin Gas Pty Ltd
Proponent's ABN	130 588 055
Date of Decision	10 August 2018
Expiry date of approval	30 June 2068
Contact details	Level 30, 180 Ann Street, Brisbane Queensland 4000

This annual compliance report is for the period November 2023 – November 2024

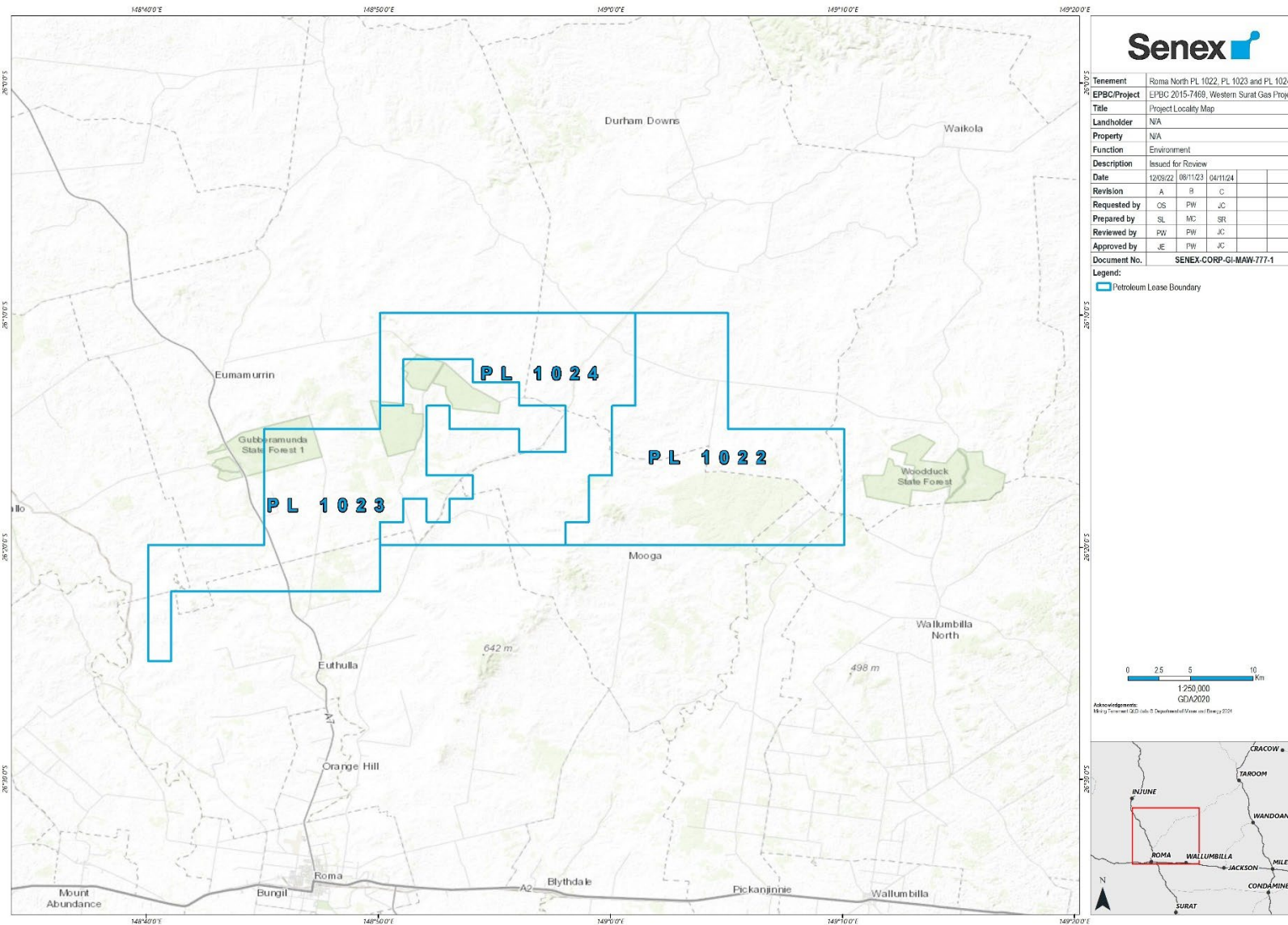


Figure 1: WSGP Location Overview

Annual Compliance Report

Senex is required to publish a report (the Annual Compliance Report) addressing compliance with each of the conditions of the approval during the previous 12 months (Condition 16). The report is to be published on the Senex website and can be found at: <https://senexenergy.com.au/news/roma-north-environmental-reports/>.

The report has been prepared to satisfy EPBC 2015/7469 condition 16 and covers activities undertaken from **November 2023 to November 2024**.

The EPBC 2015/7469 conditions of approval together with evidence to support Senex's compliance status are provided in Table 2.

Table 2: Annual Report - EPBC 2015/7469 Western Surat Gas Project

Section	Condition	Is the project compliant with this condition?	Evidence/Comments
Clearance Limits	1. The approval holder must not clear more than: a. 102 hectares (ha) of habitat for the Koala and Yakka Skink (at Attachment A) in Stage 1; and	Compliant	<p>Senex uses several processes and procedures to track disturbance as activities progress through development to ensure that approved disturbance limits are not exceeded. Senex actively works to minimise potential disturbance of listed species habitat through the implementation of an Environmental Constraints Protocol and avoidance during early design and scoping.</p> <p>During the reporting period, there was no clearing of koala or yakka skink habitat.</p> <p>Prior unavoidable clearing of Koala and Yakka Skink habitat as a result of petroleum activities in the WSGP field does not exceed the maximum clearing limits for Stage 1.</p>
	b. 130 ha of habitat for EPBC Act listed threatened species (at Attachment A) in Stage 2.	N/A	N/A - Stage 2 has not yet commenced
Stage 1 Offset Management Plan	2. To compensate for the loss of 102 ha of habitat for the Koala and Yakka Skink in Stage 1, the approval holder must implement the Stage 1 Offset Management Plan.	Partially Compliant	<p><i>Senex Energy WSGP EPBC Offsets Stage 1 – Offset Area Management Plan</i> dated April 2018 (OAMP) was approved by the Department together with the broader WSGP approval in August 2018.</p> <p>The OAMP sets out a reporting schedule for the Offset Area Report and five-yearly ecological survey results. Due to unforeseen internal staff changes, there was a delay in submitting the 2023 annual Offset Area Report and associated five-year ecological condition assessment by 30 June 2023 as required by the OAMP.</p> <p>Upon Senex becoming aware of this oversight, Senex sought an extension for later submission of the 2023 deliverables and has since closed this matter with the Department.</p>

Section	Condition	Is the project compliant with this condition?	Evidence/Comments
			<p>To prevent potential recurrence of the delayed submission, Senex has hired a team of capable and competent environmental professionals and has implemented an improved environmental compliance management system inclusive of escalating reminders for upcoming tasks.</p> <p>Senex otherwise confirms that the offset area is being managed in accordance with the OAMP and that the five-year ecological condition report confirms appropriate management of the offset area.</p>
	<p>3. The approval holder must legally secure the 168 ha offset area specified in the Stage 1 Offset Management Plan within two (2) years from the commencement of the action.</p>	Compliant	<p>Stage 1 offsets area legally secured</p> <p>The commencement date for the controlled action, the subject of the EPBC approval (WSGP), was 10 August 2018.</p> <p>On 27 March 2019, the Queensland Department of Resources declared the WSGP Stage 1 Offset Area an area of high nature conservation value under section 19G(1)(b) of the Vegetation Management Act 1999 (Queensland).</p>
Stage 2 Offset Management Plan	<p>4. Prior to the commencement of Stage 2, the approval holder must undertake pre-clearance surveys and habitat assessment for EPBC Act listed threatened species. The preclearance surveys must be undertaken by a suitably qualified person and in accordance with the Department's survey guidelines or best practice guidelines in effect at the time of the survey.</p>	N/A	N/A - Stage 2 has not yet commenced
	<p>5. The approval holder must submit a Stage 2 Offset Management Plan (OMP) for the written approval of the Minister. The Stage 2 OMP must be prepared by a suitably qualified person in accordance with the Department's Environmental Management Plan Guidelines and meet the requirements of the EPBC Act Environmental Offsets Policy.</p>	N/A	N/A - Stage 2 has not yet commenced
	<p>6. The approval holder must legally secure the environmental offsets for Stage 2 within two (2) years of the approval of the Stage 2 OMP.</p>	N/A	N/A - Stage 2 has not yet commenced

Section	Condition	Is the project compliant with this condition?	Evidence/Comments
	7. The approval holder must not commence Stage 2 until the Stage 2 OMP has been approved by the Minister in writing. The Stage 2 OMP must be implemented.	N/A	N/A - Stage 2 has not yet commenced
Management Plans	8. The approval holder must implement the following management plans:		
	a. Western Surat Gas Project Coal Seam Gas Water Management Plan	Compliant	Currently approved versions of these plans are available on the Senex website: https://senexenergy.com.au/news/roma-north-environmental-reports/ Implementation occurs via Senex's internal Health, Safety, Environment management System (HSEMS) and associated Senex processes and procedures.
	b. Western Surat Gas Project Water Monitoring and Management Plan	Compliant	
	c. Western Surat Gas Project Environmental Management Plan	Compliant	
	d. Western Surat Gas Project Significant Species Management Plan	Compliant	
	9. Between years three (3) and five (5) after the approval date, the approval holder must submit a revised Western Surat Gas Project Coal Seam Gas Water Management Plan and Western Surat Gas Project Water Monitoring and Management Plan for the written approval of the Minister. The revised plans must:	Compliant	The updated plans were initially submitted to the Department for approval on 18 August 2023, and resubmitted based on commentary provided by the Department in April 2024. Ministerial approval of the updated plans was received on 25 October 2024. Updated plans have been uploaded to the Senex Energy website.
	a. be in accordance with the Department's Environmental Management Plan Guidelines	Compliant	
	b. include an assessment of the effectiveness of measures contained in the Western Surat Gas Project Coal Seam Gas Water Management Plan and Western Surat Gas Project Water Monitoring and Management Plan in avoiding, mitigating and managing impacts on protected matters, and	Compliant	
	c. include a comparison of impacts on protected matters against impacts predicted in the Public Environment Report.	Compliant	

Section	Condition	Is the project compliant with this condition?	Evidence/Comments
	10. The approval holder must not implement the revised Western Surat Gas Project Coal Seam Gas Water Management Plan and Western Surat Gas Project Water Monitoring and Management Plan until the revised plans have been approved by the Minister. The approved revised plans must be implemented within 12 months of plan approval.	Compliant	Updated plans were submitted for DCCEEW approval on 18 August 2023 and approved on 25 October 2024. Updated plans have been uploaded to the Senex Energy website and are now being implemented.
Chemical Risk Assessment	11. Prior to use of new drilling fluid compound/s, the approval holder must undertake a chemical risk assessment.	Compliant	Original Chemical Risk Assessment was submitted with the WSGP Public Environment Report. No new chemicals for drilling purposes have been assessed post the 2023 annual compliance report.
	12. Where a new drilling fluid compound/s is determined by the chemical risk assessment to be high risk, the approval holder must submit the chemical risk assessment for the high risk new drilling fluid compound/s for the written approval of the Minister.	Compliant	No update from the previous 2023 reporting period, as no new chemicals for drilling purposes have been assessed.
	13. The approval holder must not use the new drilling fluid compound/s considered high risk until the chemical risk assessment has been approved by the Minister.	N/A	N/A - See above
Administrative conditions	14. Within 20 business days after the commencement of the action, the approval holder must advise the Department in writing of the actual date of commencement.	Compliant	The action commenced on 10 August 2018 as per correspondence sent to Merinda Nash 6 September 2018 and acknowledged by Valerie Hush on 10 September 2018.
	15. 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 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.	Compliant	Current approved versions of the plans required by this approval are available on the Senex website: https://senexenergy.com.au/news/roma-north-environmental-reports/ Compliance against the conditions of approval for EPBC 2015/7469 is actively monitored and tracked via Senex' environmental compliance management system and associated software. Appropriate records have been kept and measures taken to ensure relevant plans are implemented.

Section	Condition	Is the project compliant with this condition?	Evidence/Comments
			All data can be made available to the department upon request.
	16. Within three (3) months of every 12 month anniversary of the commencement of the action, the approval holder must publish a report (the Annual Compliance Report) on its website addressing compliance with each of the conditions of this approval during the previous 12 months. 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 Annual Compliance Report is published. Reports must remain published for the duration of this approval. The approval holder must continue to publish the Annual Compliance Report until otherwise advised by the Minister in writing.	Compliant	On submission of this report to the Department, Senex will (on the same day) upload the same report to its website and submit a further email to the Department providing the weblink to the report and summarising Senex' compliance record over the last 12 months.
	17. Any contravention of the conditions of this approval (including contravention of a commitment made in a management plan, program or strategy) must be reported to the Department within 7 days of the approval holder becoming aware of the contravention.	Non-Compliant	<p>Senex has a strong record of compliance with its approval conditions.</p> <p>During the reporting period, it was identified that an administrative non-compliance with condition 2 of the approval had not been notified to the Department within the required timeframe. Measures including the introduction of environmental compliance management software have since been implemented to prevent a recurrence.</p> <p>Further details of the non-compliance are summarised against Condition 2 of this report.</p>

Section	Condition	Is the project compliant with this condition?	Evidence/Comments
	18. 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 approval holder must not commence the audit until the Minister approves the independent auditor and audit criteria in writing. The audit report must address the criteria to the satisfaction of the Minister.	N/A	N/A - The Minister has not requested an independent audit of compliance against the conditions of approval during this reporting period.
	19. The approval holder may choose to revise a management plan specified under conditions 8 and 9 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, it must:	N/A	N/A - No revisions to plans named in this approval have been submitted. Current approved versions of all named plans are available on Senex's website. Updated versions of the CSG WMP and CSG WMMP were submitted in accordance with condition 9 and correspondence approving the updated plans was received from the Minister on 25 October 2024.
	<p>a. notify the Department in writing that the approved plan has been revised and provide the Department, at least four (4) weeks before implementing the revised plan, with:</p> <ul style="list-style-type: none"> i. an electronic copy of the revised plan; ii. an explanation of the differences between the revised plan and the approved plan; and iii. reasons the approval holder considers that the taking of the action in accordance with the revised plan would not be likely to have a new or increased impact. 	N/A	N/A – See above
	20. The approval holder may revoke its choice under condition 19 at any time by notice to the Department. If the approval holder revokes the choice to implement a revised plan, without approval under section 143A of the EPBC Act, the plan approved by the Minister must be implemented.	N/A	N/A
	21. 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 would be likely to have a new or increased impact, then:	N/A	N/A

Section	Condition	Is the project compliant with this condition?	Evidence/Comments
	a. condition 19 does not apply, or ceases to apply, in relation to the revised plan; and		
	b. the approval holder must implement the plan approved by the Minister.	N/A	N/A
	To avoid any doubt, this condition does not affect any operation of conditions 19 and 20 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 condition 19 does not apply for one or more specified plans required under the approval.	N/A	N/A
	22. Conditions 19, 20 and 21 are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised plan to the Minister for approval.	N/A	N/A
	23. If, after five (5) years from the date of this approval, the approval holder has not commenced the action, then the approval holder must not commence the action without the written agreement of the Minister.	Compliant	The action commenced on 10 August 2018 as per email correspondence sent to the Department 6 September 2018 and acknowledged by the Department on 10 September 2018.
	24. Unless otherwise agreed to in writing by the Minister, the approval holder must publish all plans referred to in the conditions of this approval on its website. Each plan must be published on the website within one (1) month of being approved by the Minister. All plans must remain on the website for the duration of this approval unless otherwise agreed to in writing by the Minister.	Compliant	Current approved versions of the plans required by this approval are available on the Senex website: https://senexenergy.com.au/news/roma-north-environmental-reports/



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Final Audit Report

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