

Western Surat Gas Project – EPBC 2015/7469

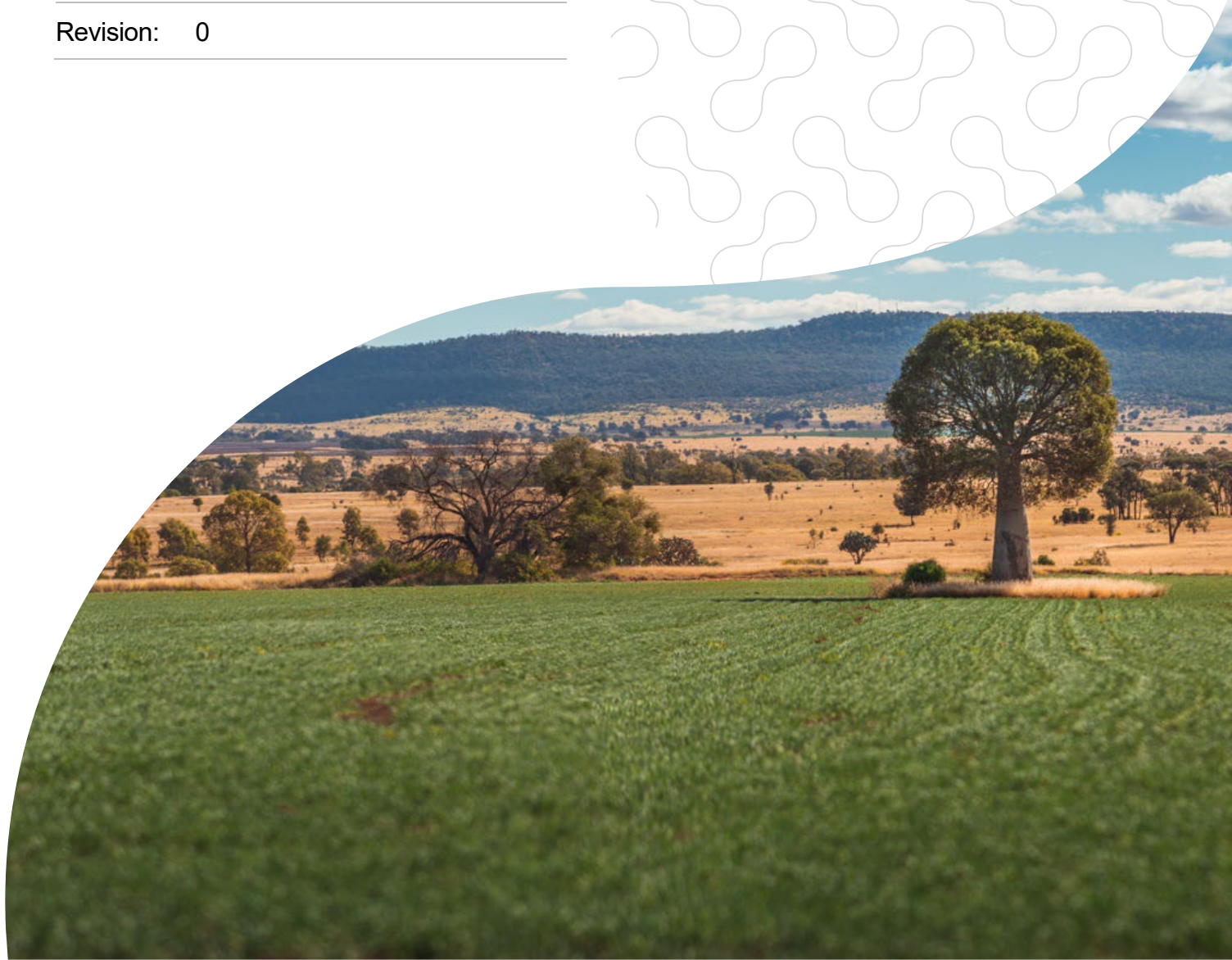
Annual Compliance Report

10 August 2024 to 9 August 2025

Date: 13 October 2025

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Document Version Control

Revision	Release Date	Document Status	Revision Comments
A	02 October 2025	Draft	Issued for review
0	13 October 2025	Final	Issued for use

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) 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:

Jacob Cumpstay

Position:

Environment Manager

Organisation:

Senex Energy Pty Ltd

Date:

13 October 2025

Annual Compliance Report

Description of Activities

Stuart Petroleum Cooper Basin Gas Pty Ltd is developing the Western Surat Gas Project (the **Project**) in southwest Queensland. The Project involves the construction and operation of a coal seam gas field and supporting infrastructure, including the drilling of up to 425 wells.

Project details for the approved action are outlined in Table 1.

Table 1: Description of Activities

EPBC Number	2015/7469
Project Name	Western Surat Gas Project (WSGP)
Approval Holder	Stuart Petroleum Cooper Basin Gas Pty Ltd (a wholly owned subsidiary of Senex Energy Pty Ltd (Senex)) ACN: 130 588 055
Approved Action	The construction and operation of a coal seam gas field and supporting infrastructure, including the drilling of up to 425 wells, near Roma in southwest Queensland (as described in EPBC referral 2015/7469 received on 24 April 2015 and the variation of proposal described in the correspondence dated 28 February 2017)
Date of decision	10 August 2018
Expiry date of approval	30 June 2068
Location of the Project	Southwest Queensland, near Roma. Refer Figure 1.
Dates of reporting period	10 August 2024 to 10 August 2025
Dates of preparation of report	01 October to 13 October

EPBC approval conditions and compliance table

This Annual Compliance Report was prepared to satisfy the requirements of Condition 16 of the Western Surat Gas Project's approval under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (**EPBC Act**) (the **Approval**).

The full compliance assessment is at Table 2. The following condition of the Approval requires this report:

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.

Terms used in this report have the same meaning as those in the Approval, unless otherwise defined.

Environmental risks

No new environmental risks have been identified during the reporting period.

Figure 1: Location of Project

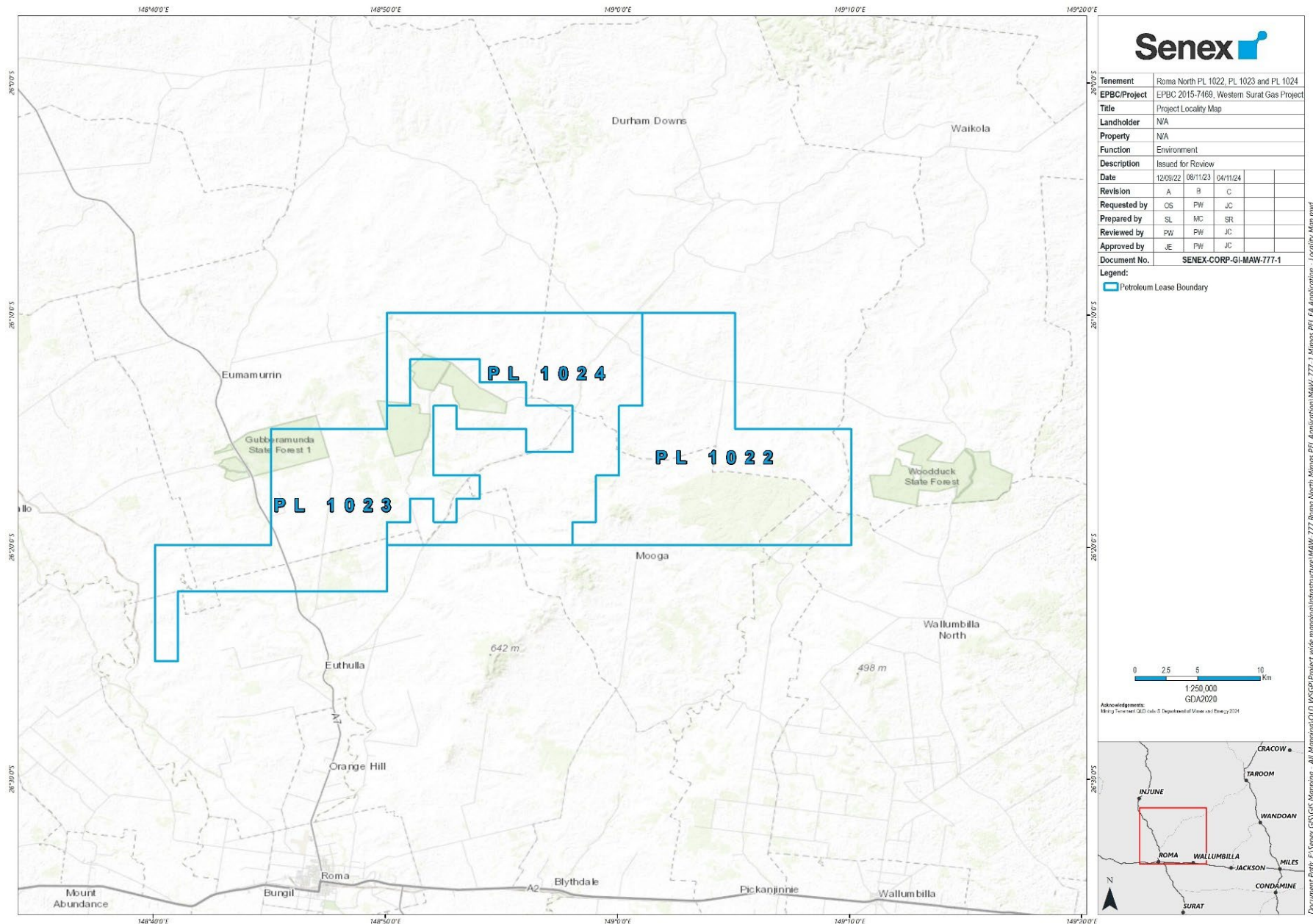


Table 2: EPBC 2015/7469 Western Surat Gas Project Compliance Assessment

Condition Number	Condition	Is the project compliant with this condition?	Evidence/Comments
Clearance Limits			
1.	The approval holder must not clear more than:	Compliant	The Approval Holder has unavoidably cleared 76.6 ha of habitat for the Koala and Yakka Skink to date, which remains within the approved limits.
1.a.	102 hectares (ha) of habitat for the Koala and Yakka Skink (at Attachment A) in Stage 1; and		
1.b.	130 ha of habitat for EPBC Act listed threatened species (at Attachment A) in Stage 2.	Not applicable	Stage 2 of the project 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.	Compliant	<i>Senex Energy WSGP EPBC Offsets Stage 1 – Offset Area Management Plan</i> dated April 2018 (OAMP) was approved by the Department with the Approval in August 2018. This offset area is being managed in accordance with the approved OAMP. Section 7 of the OAMP sets out a reporting schedule with the next report to the Department due in 2028.
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.	Compliant	The Stage 1 offset area has been legally secured since 27 March 2019 by way of a declaration under section 19G(1)(b) of the <i>Vegetation Management Act 1999</i> (Qld).
Stage 2 Offset Management Plan			
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.	Not applicable	Stage 2 has not yet commenced.

Condition Number	Condition	Is the project compliant with this condition?	Evidence/Comments
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.		
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.		
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.		
Management Plans			
8.	The approval holder must implement the following management plans:	Compliant	Versions of these management plans being implemented are available on the Senex website: https://senexenergy.com.au/news/roma-north-environmental-reports/
8.a.	Western Surat Gas Project Coal Seam Gas Water Management Plan		
8.b.	Western Surat Gas Project Water Monitoring and Management Plan		
8.c.	Western Surat Gas Project Environmental Management Plan		
8.d.	Western Surat Gas Project Significant Species Management Plan		

Condition Number	Condition	Is the project compliant with this condition?	Evidence/Comments
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	Revised: - Western Surat Gas Project Coal Seam Gas Water Management Plan; and - Western Surat Gas Project Water Monitoring and Management Plan, were submitted to the Department for written approval on 18 August 2023, as varied in April 2024 based on the Department's feedback. The Minister provided written approval of the revised plans on 25 October 2024.
9.a.	be in accordance with the Department's Environmental Management Plan Guidelines	Compliant	
9.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	
9.c.	include a comparison of impacts on protected matters against impacts predicted in the Public Environment Report.	Compliant	
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	Revised plans were approved by the Minister in October 2024 and are being implemented.

Condition Number	Condition	Is the project compliant with this condition?	Evidence/Comments
Chemical Risk Assessment			
11.	Prior to use of new drilling fluid compound/s, the approval holder must undertake a chemical risk assessment.	Compliant	The original WSGP Chemical Risk Assessment was submitted with the Public Environment Report. The Approval Holder engaged EHS Support to undertake a chemical risk assessment for a new drilling fluid compound (SuperScavenger) in early 2025. This assessment determined the chemicals within SuperScavenger to be either Tier 1 or Tier 2 and of low toxicity and low hazard with negligible risks.
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 new drilling fluid compound/s were determined to be high risk during the reporting period.
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.	Not applicable	
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 per advice to the Department on 6 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	Compliance against the conditions of approval for EPBC 2015/7469 is actively monitored and recorded via the Approval Holder's environmental compliance management system and associated software. Appropriate records have been kept and measures taken to ensure relevant plans are implemented.

Condition Number	Condition	Is the project compliant with this condition?	Evidence/Comments
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	Senex's EPBC Annual Compliance Reports for the WSGP can be accessed online at the following address: https://senexenergy.com.au/news/roma-north-environmental-reports/ Senex will include this weblink in the email submission of this report to the Department.
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.	Compliant	The Approval Holder has a strong record of compliance with its approval and is not aware of any contravention of a condition requiring reporting to the Department during this reporting period.
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.	Not applicable	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:	Not applicable	No plans named in this approval have been revised within the reporting period.

Condition Number	Condition	Is the project compliant with this condition?	Evidence/Comments
19.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: 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.	Not applicable	
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.	Not applicable	
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:	Not applicable	
21.a.	condition 19 does not apply, or ceases to apply, in relation to the revised plan; and	Not applicable	
21.b.	the approval holder must implement the plan approved by the Minister.	Not applicable	
21 (cont.)	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.	Not applicable	

Condition Number	Condition	Is the project compliant with this condition?	Evidence/Comments
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.	Not applicable	
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.
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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