



ID Q-1000-01-RP-0002

Integrated Gas

Australia Pacific LNG

Annual Compliance Report 2021-2022

EPBC 2017/7902 (Alfredson)

Review record

Rev	Date	Reason for issue	Reviewer/s	Consolidator	Approver
0	16 Nov 2022	2 Sept 2021 to 1 Sept 2022 report	N Buchanski L James C Owen	L Follent	S. Thatcher

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1. Purpose

This Report provides the compliance status for each condition of *Environment Protection and Biodiversity and Conservation Act* (EPBC Act) 2017/7902 Approval (the Approval).

This Report has been prepared in accordance with condition 14 and the definition of 'compliance report' in the Approval:

Condition 14: The approval holder must prepare a compliance report for each 12 month period following the date of the approval of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:

a) publish each compliance report on its website within 60 business days following the relevant 12 month period;

b) notify the Department by email that a compliance report has been published on its website within 5 business days of the date of publication;

c) keep all compliance reports publicly available on its website for the duration of this approval;

d) exclude or redact sensitive ecological data from compliance reports published on its website; and

e) where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication.

Note: Compliance reports may be published on the Department's website.

Compliance report means written reports:

i. providing accurate and complete details of compliance, incidents, and non-compliance with the conditions and plans;

ii. consistent with the Department's Annual Compliance Report Guidelines (2014) (or subsequent revision);

iii. include a shapefile of any impact on any habitat for listed threatened species undertaken within the relevant 12 month period; and

iv. identifying the version/s of the plans prepared and in existence in relation to the conditions of this approval during the relevant 12 month period.

2. Details of activities and scope

Table 1 sets out the scope and details of the relevant activities subject to EPBC Approval 2017/7902 and this compliance report.

Table 1: Key Approval and Project Details

Element	Description
EPBC number:	2017/7902
Project Name:	Alfredson
Approval Holder and ABN:	Australia Pacific LNG Pty Limited, 001 646 331
The Approved Action:	To construct, operate and decommission up to 68 coal seam gas wells and associated gathering infrastructure (gas and water gathering flowlines, access road, power and communication systems, laydowns, stockpiles,

	storage areas) in the Alfredson Block Development on PLIOII, 40 km south of Miles in Queensland
Location of the Project:	40 km south of Miles in Queensland
Person Accepting Responsibility for this Report:	Refer to Declaration (Section 7)
Dates for the Reporting Period for the Report:	2 September 2021 to 1 September 2022 inclusive
Date of Preparation of the report:	16 November 2022

3. Abbreviations

Definitions for terms and acronyms are provided Table 2.

Table 2: Terms and Acronyms

Term/Acronym	Definition/Expansion
CSG	Coal Seam Gas
Department	The Australian Government agency responsible for administering the EPBC Act.
EPBC Act 1999	Environment Protection and Biodiversity Conservation Act 1999
Ha	hectare
LNG	Liquid Natural Gas
M	metre
Minister	The Australian Government Minister administering the EPBC Act including any delegate thereof.
MNES	Matters of National Environmental Significance
MP	Management Plan
RAMP	Revised Action Management Plan

4. Compliance Assessment

4.1 Compliance

Compliance with the conditions of the Approval for the reporting period is set out in Table 3.

4.2 Non-Compliances

No non-compliances have been identified in the reporting period.

Table 3: Compliance with the conditions of the Approval for the reporting period

Condition No.	Condition	2022 Status	2022 Compliance Statement
Part A - Conditions specific to the action Maximum Impact Limits			
1	The approval holder must not impact more than: a. 5.4 ha of Brigalow (<i>Acacia harpophylla</i> dominant and co-dominant) threatened ecological community. b. 6.1 ha of habitat for snails.	Compliant	a. 0.026 ha disturbed (0.011 ha disturbance within this reporting period – shapefile provided) b. 0.55 ha disturbed (unchanged from last report)
Water Resources - Monitoring and Management Plans			
2	The approval holder must implement the following action management plans for the duration of this approval or as otherwise agreed to in writing by the Minister: a. Groundwater Monitoring Plan; and b. Talinga-Condabri Integrated CSG Water Management Plan.	Compliant	Groundwater Management Plan (Revision 5) and CSG Water Management Plan (Revision 7) are being implemented.
3	Within two years of the approval of the action, the approval holder must submit revised versions of the approved action management plans specified in condition 2 for the written approval of the Minister. The revised action management plans must be in accordance with the Department's Environmental Management Plan Guidelines and Coal seam gas water management guidelines, and include, but not limited to: a. an assessment of the effectiveness of measures contained in the plans provided in the preliminary documentation in avoiding, monitoring, mitigating and managing impacts on protected matters; b. a detailed comparison of actual impacts on protected matters with impacts predicted in the preliminary documentation; and c. the measures proposed to be implemented, in light of the findings of the analyses required by parts a. and b. above, to monitor groundwater and manage CSG produced water as part of the action.	Compliant	A revised Groundwater Monitoring Plan and CSG Water Management Plan were submitted to the Department on 1 September 2021, within two years of the approval of the action. Another revision of the CSG Water Management Plan was submitted to the Department for approval on 21 October 2022. Written approval for the revised action management plans has not been received.

Condition No.	Condition	2022 Status	2022 Compliance Statement
4	The approval holder must not implement the revised action management plans required under condition 3 until these have been approved in writing by the Minister. The approved revised action management plans must be implemented unless subsequently revised in accordance with one or other provision of conditions 20 - 25.	N/A	The revised action management plans are not being implemented.
Water Resources - Coal Seam Gas (CSG) Produced Water			
5	All CSG produced water produced by the action must be managed in accordance with the Talinga- Condabri Integrated CSG Water Management Plan and used only for: a. beneficial use of water for construction and rehabilitation activities; b. irrigation and stock watering; and/or c. contingent dam storage.	Compliant	All CSG produced water produced in the development area was managed in accordance with the condition.
Chemical Risk Assessment			
6	Prior to the use of any new drilling fluid compound, the approval holder must undertake a chemical risk assessment. The chemical risk assessment must be undertaken in accordance with best practice risk assessment methodology.	N/A	No new drilling fluid compounds have been used.
7	The approval holder must implement the approved chemical risk assessment.	N/A	As above.
8	The approval holder must not use any new drilling fluid compound considered high risk until the chemical risk assessment for that new drilling fluid compound has been approved in writing by the Minister.	N/A	As above.
Part B - Standard administrative conditions Notification of date of commencement of the action			

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Condition No.	Condition	2022 Status	2022 Compliance Statement
9	The approval holder must notify the Department in writing of the date of the commencement of the action within 10 business days after the date of the commencement of the action.	N/A	Not applicable to this reporting period. The date of the commencement of the action was 14 October 2019.
10	If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the written agreement of the Minister.	N/A	Not applicable, the action commenced prior to 5 years from the date of the approval.
Compliance Records			
11	The approval holder must maintain accurate and complete compliance records.	Compliant	Compliance records are maintained in the relevant systems and are accurate and complete.
12	If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request. Note: Compliance records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the Department's website or through the general media.	N/A	No requests were received from the Department.
Preparation and publication of plans			

Condition No.	Condition	2022 Status	2022 Compliance Statement
13	<p>The approval holder must:</p> <ul style="list-style-type: none"> a. submit the plans electronically to the Department for written approval by the Minister; b. publish each plan on its website within 20 business days of the date the plan is approved by the Minister or, in the case of revised action management plans submitted in accordance with condition 22 within 2 business days of the date on which the approval holder will implement the revised action management plan unless the Minister gives a notice under condition 24 in respect of the revised action management plan; c. exclude or redact sensitive ecological data from plans published on its website or provided to a member of the public; and d. keep plans published on its website for the duration of this approval. 	N/A	No plans were submitted to the Department for written approval or approved by the Minister in the reporting period.
Annual Compliance Reporting			
14	<p>The approval holder must prepare a compliance report for each 12 month period following the date of the approval of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must:</p> <ul style="list-style-type: none"> a. publish each compliance report on its website within 60 business days following the relevant 12 month period; b. notify the Department by email that a compliance report has been published on its website within 5 business days of the date of publication; c. keep all compliance reports publicly available on its website for the duration of this approval; d. exclude or redact sensitive ecological data from compliance reports published on its website; and e. where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication. <p>Note: Compliance reports may be published on the Department's website.</p>	Compliant	<p>The annual compliance report was prepared and published within the required timeframes, and the Department was notified by email of the publication. All reports are available on the website https://aplng.com.au/management-plans/.</p>

Condition No.	Condition	2022 Status	2022 Compliance Statement
Reporting Non-compliance			
15	The approval holder must notify the Department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable but no later than 2 business days after becoming aware of the incident or non-compliance. The notification must specify: a. the condition which is or may be in breach; and b. a short description of the incident and/or non-compliance.	Compliant	Origin is not aware of any incidents; non-compliance with the conditions; or non-compliance with the commitments made in plans during this reporting period. There have been no notifications submitted during this reporting period.
16	The approval holder must provide to the Department the details of any incident or non-compliance with the conditions or commitments made in the plans as soon as practicable but no later than 10 business days after becoming aware of the incident or non-compliance, specifying: a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future; b. the potential impacts of the incident or non-compliance; and c. the method and timing of any remedial action that will be undertaken by the approval holder.	Compliant	As above.
Independent Audit			
17	The approval holder must ensure that independent audits of compliance with the conditions of approval are conducted when requested in writing by the Minister.	N/A	There have been no independent audits conducted during the reporting period

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Condition No.	Condition	2022 Status	2022 Compliance Statement
18	For each independent audit, the approval holder must: a. provide the name and qualifications of the independent auditor and the draft audit criteria to the Department; b. only commence the independent audit once the audit criteria have been approved in writing by the Department; and c. submit an audit report to the Department within the timeframe specified in the approved audit criteria.	N/A	As above.
19	The approval holder must publish the audit report on its website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on its website for the duration of this approval.	N/A	As above.
Revision of action management plan			
20	The approval holder may apply to the Minister for a variation to the action management plan required under conditions 3 and 5, or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves the revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.	Compliant	Revised Groundwater Monitoring Plan and CSG Water Management Plan were submitted to the Department on 1 September 2021 in accordance with Condition 3. Another revision of the CSG Water Management Plan was submitted to the Department on 21 October 2022. The revised action management plans have not been approved by the Minister.
21	The approval holder may choose to revise an action management approved by the Minister under conditions 3 and 5, or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the RAMP would not be likely to have a new or increased impact.	N/A	No action management plans have been revised without the submission for approval.

Condition No.	Condition	2022 Status	2022 Compliance Statement
22	<p>If the approval holder makes the choice under condition 21 to revise an action management plan without submitting it for approval, the approval holder must:</p> <ul style="list-style-type: none"> a. notify the Department in writing that the approved action management plan has been revised and provide the Department with: <ul style="list-style-type: none"> i. an electronic copy of the RAMP; ii. an electronic copy of the revised RAMP marked up with track-changes to show the differences between the approved action management plan and the RAMP; iii. an explanation of the differences between the approved action management plan and the RAMP; iv. the reasons the approval holder considers that taking the action in accordance with the RAMP would not be likely to have a new or increased impact; and v. written notice of the date on which the approval holder will implement the RAMP (RAMP implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the Department. b. subject to condition 24, implement the RAMP from the RAMP implementation date. 	N/A	As above.
23	<p>The approval holder may revoke its choice to implement the RAMP under condition 21 at any time by giving written notice to the Department. If the approval holder revokes its choice, the approval holder must implement the previous action management plan approved by the Minister.</p>	N/A	As above.

Condition No.	Condition	2022 Status	2022 Compliance Statement
24	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 RAMP would be likely to have a new or increased impact, then: <ol style="list-style-type: none"> a. condition 21 does not apply, or ceases to apply, in relation to the RAMP; and b. the approval holder must implement the action management plan specified by the Minister in the notice. 	N/A	As above.
25	At the time of giving the notice under condition 24, the Minister may also notify that for a specified period of time, condition 21 does not apply for one or more specified action management plans. Note: conditions 20 to 25 are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a RAMP, at any time, to the Minister for approval.	N/A	As above.
Completion of the action			
26	Within 30 days after the completion of the action, the approval holder must notify the Department in writing and provide completion data.	N/A	The action has not been completed.
Monitoring Data			
27	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under conditions 2 and 6, is prepared in accordance with the Department's Guidelines for biological survey and mapped data (2018) and submitted electronically to the Department in accordance with the requirements of the plans.	N/A	No data in accordance with the Department Guidelines for Biological survey and mapped data has been prepared.

5. Management plans referenced

Documents referenced in this Compliance report are listed below.

Table 4: Management Plans


Document Number	Title
CDN/ID 8229619	Talinga-Condabri Integrated CSG Water Management Plan (Revision 7)
CDN/ID 11788517	Groundwater Monitoring Plan (Revision 5)

6. New Environmental Risks

There have been no new environmental risks identified during the relevant reporting period.

7. 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: 
[Stephen Thatcher \(Nov 16, 2022 13:41 GMT+10\)](#)

Full name (please print): Steve Thatcher

Position (please print): General Manager, Asset East

Organisation (please print including ABN/ACN if applicable):

Australia Pacific LNG Pty Limited, ACN 001 646 331

Date: 16/11/2022