

Santos Titleholder Report on Public Comments

Santos WA Northwest Pty Ltd (Santos) proposes to drill up to seven (7) exploration and/or appraisal wells in Commonwealth waters within the Bedout Basin. The *Bedout Multi-Well Exploration and Appraisal Drilling Environment Plan (EP)* will cover drilling, evaluating, well testing and abandonment activities related to proposed exploration and appraisal drilling.

Activities also include geophysical, hydrographic and geotechnical surveys to gather critical seabed and subsurface data that will enable the safe and accurate placement of a Mobile Offshore Drilling Unit (MODU/drilling rig) to undertake the drilling.

The wells are proposed to be drilled between Q3 2026 and Q3 2031 using a moored semi-submersible MODU and/or jack-up MODU. The wells will each take between ~40–110 days to drill, including contingency. The wells may be drilled singularly or as part of a campaign of multiple wells. The wells will be drilled within the defined Bedout Basin Operational Areas (herein referred to as OAs) named Curie, Ara, Wallace and Mestrel/Bancroft which are in the Exploration Permit Areas of WA-541-P, WA-435-P and WA-436-P.

The EP was submitted to NOPSEMA for completion check on 3 December 2025, and on acceptance, was released for 30-day public comment from 9 December 2025 to 8 January 2026 (inclusive). The following report has been prepared in accordance with NOPEMA's Guidance Note: *Titleholder report on public comment N-04750-FM1846: A662604 (10/01/2024)*.

This report provides an evaluation of the issue or theme as it relates, or otherwise, to the environment management of the activity, and a statement by Santos as to how the issue or theme has been taken into account, or otherwise in the EP.

Where Santos has made changes to the EP as a result of information received through the public comment process, these have been clearly identified in the report by both reference to the EP section and underlined text. A summary response is shown in shaded text, with further detailed provided where required.

Where comments have been received that do not relate to the EP, or the activity to which the EP relates, the report outlines the nature of these comments with a clear statement that due to the irrelevancy of the comments, they have not been considered further in preparing the EP.

A total of 100 public submissions were received¹, the majority of which drew content from *Briefing Note: Santos's Bedout gas proposal (19 December 2025)* prepared by the Conservation Council of WA Fossil Fuels Team and published on its website by the Go Beyond Gas community movement. No new relevant persons (whose functions, interests or activities may be affected by the activity) self-identified through the public comment process. Santos did not identify any new or potentially relevant persons through the public comment process. Further, in responding to the public comments (including those provided from certain relevant persons), Santos has confirmed that: further consultation is not required and that it has discharged its obligations pursuant to section 25 of the OPGGS(E) R.

Titleholder details and EP liaison contact information is provided in Table 1 below:

¹ One submission was received during the public comment period which has been excluded from this response on the basis that it contains sensitive information. That submission, and Santos' responses to it, has not been published in this document.

Table 1: Titleholder and contact information

Titleholder		ACN	Business Address	
Santos WA Northwest Pty Ltd		009 140 854	Level 7, 100 St Georges Terrace Perth WA 6000	
Santos WA Southwest Pty Limited		050 611 688		
BP Developments Australia Pty Ltd		081 102 856	Level 15, 240 St Georges Terrace, Perth WA 6000	
Carnarvon Energy Limited		002 688 851	Level 2, 76 Kings Park Road, West Perth WA 6005	
OPIC Australia Pty Limited		008 603 487	14F, NO.3, Sungren Road, Shinyi District, Taipei, Taiwan 110207, R.O.C.	
Nominated liaison person				
Name	Business address	Email		Phone contact
Dawn MacInnes Manager Environmental Approvals WA, NA, TL	Level 7, 100 St Georges Terrace, Perth, Western Australia (WA) 6000	WA.NT.Regulatory@santos.com		(08) 6218 7100

Table 2: Public comments received and titleholder response

#ID	Comments received	Santos response
Key Matter: Seabed disturbance		
1SD	<ul style="list-style-type: none"> <i>Claim: Concerns are that the drilling will cause damage to the seabed; and that the results of the drilling, if the project is approved, will cause harm to the environment and to Australia.</i> 	<p>Santos notes the claims regarding seabed disturbance and has reviewed the EP to ensure that impacts of seabed disturbance have been adequately considered and addressed. Revisions to the EP, where required, are set out below.</p> <p>The activity will disturb a small area of seabed around each drilling location. We expect the seabed in these areas to be mainly soft sand and rocks with no sensitive habitats or significant features. Santos will undertake surveys to confirm this before the activity starts. These areas will naturally recover within weeks to months following completion of the activity. There is no planned anchoring of support vessels within the OAs, further minimising seabed interaction and the potential for anchor or chain drag across the seafloor.</p> <p>Section 6.2 of the EP describes the potential Seabed and Benthic Habitat Disturbance that may occur in the operational areas (OAs) from the activities, the proposed environmental outcomes and control measures and the environmental impact and assessment.</p> <p><u>Santos has revised Section 6.2.5 of the EP which describes how Santos will ensure impacts to seabed and benthic habitats are reduced to as low as reasonably practicable (ALARP). This section provides further clarification regarding site surveys prior to mooring of the drilling rig MODUs.</u></p> <p><u>An additional control measure BB-CM-65 “Monitoring of mooring equipment” has been added to the EP (Table 6-3) to commit Santos to this monitoring of mooring equipment.</u></p> <p>Santos notes the claim regarding results of the drilling and harm to the environment if the project is approved, and notes that any future activities beyond the stated scope of the EP will be the subject of separate regulatory approvals under the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations (Cth) 2023 (OPGG(E)R).</p>

Key matter: Climate change		
<p>2CC</p>	<ul style="list-style-type: none"> • <i>Claim: Concern regarding new gas projects and the 1.5-degree warming targets set by the Paris Agreement.</i> • <i>Claim: Concern regarding delaying the transition to renewables.</i> • <i>Claim: This proposal represents a significant escalation of offshore gas exploration and is incompatible with Australia’s stated climate policy framework, national and International obligations.</i> 	<p>Santos notes the claims regarding climate change and the impact of global warming and has reviewed the EP to ensure that these matters are appropriately considered and addressed.</p> <p>The Greenhouse Gas (GHG) emissions from the proposed Bedout exploration and appraisal drilling activities are estimated to be approximately 0.03% of total annual Australian GHG emissions. As such, these proposed activities will not substantially contribute to Australia’s GHG emissions levels. Section 6.5.2 of the EP addresses the release of gases and other substances into the air (emissions), and more specifically GHG emissions. Section 6.5.3 of the EP details the proposed control measures for managing atmospheric emissions.</p> <p>The proposed Bedout exploration activity supports the provision of WA’s future gas supply.</p> <p>Santos notes that the EP is for drilling, evaluating, well testing and abandonment activities related to proposed drilling exploration and appraisal activities only.</p> <p>Future operation/production activities are not covered by this EP and will be subject to separate regulatory approvals if this exploration and appraisal drilling campaign is successful, and the titleholders determine to proceed.</p>
Key matter: Loss of well control (LOWC) and inadequate spill response capability		
<p>3LOWC</p>	<ul style="list-style-type: none"> • <i>Claim: Exploration drilling presents a high risk/probability of blowouts. The proposal therefore poses unacceptable risks of oil spills which could impact a vast area of Western Australia’s oceans, reefs, marine life and coastlines.</i> • <i>Claim: Proposed mitigation and response measures rely largely on procedural controls and do not demonstrate that impacts will be reduced to as low as reasonably practicable (ALARP), particularly in a remote offshore context with limited spill response capacity.</i> • <i>Claim: The Browse project and the Bedout proposal both cite a worst-</i> 	<p>Santos notes the claims regarding loss of well control (LOWC) and oil spills related to drilling and has reviewed the EP and <i>Bedout Multi Well Exploration and Appraisal Drilling Oil Pollution Emergency Plan (OPEP)</i> to ensure that this matter is appropriately considered and addressed. Revisions to the EP and Oil Pollution Emergency Plan (OPEP), where required, are set out below.</p> <p>Exploration drilling does not pose a high risk of a LOWC. There is a remote chance of a LOWC occurring, at less than a 0.02%. The EP includes plans to respond to a worst-case spill; in the remote chance it occurs. The regulator’s (NOPSEMA) assessment of the EP ensures that this plan will reduce the risk and impact to as low as reasonably practicable (ALARP) and acceptable levels, as required by the Regulations.</p> <p>The OPEP addresses spill response operations, and Section 7.6 of the EP addresses LOWC.</p> <p>Probability of LOWC</p> <p>As detailed in Section 7.6.4. of the EP, the likelihood of LOWC is considered ‘remote’. This likelihood is based on a past global occurrence frequency of 1.5×10^{-4} per well, (or stated more simply, approximately 1 event per 6,667 wells drilled) (IOGP, 2019).</p> <p>Over the course of the last decade, the offshore petroleum industry has globally developed and implemented significantly more rigorous well-control regulations. As a result, large oil spills from LOWC are now rare.</p>

	<p><i>case scenario oil spill lasting 77 days. The response from the EPA prompted Woodside to amend its project proposal.</i></p> <p><i>‘Tactical response plans for priority protection areas’ (OPEP p79) cites a ten-day window to have services procured, and to have Tactical Response Plans drafted and issued for use; and 77 days before a relief well could be drilled (EP p101).</i></p>	<p>The claims raised here appear to be the result of a misunderstanding. - A LOWC event has a 99.985% (based on 1 in 6,667 frequency) [IOGP, 2019] or 99.996% (based on a 1 in 25,510 frequency) [S. L. Ross, 2017] chance of NOT happening during the drilling of any single well.</p> <p>The claims appear to present concerns regarding LOWC as if the probabilities were interpreted to have the inverse meaning: that LOWC is an actuality or inevitable outcome of the drilling activities. Section 7.6.4 of the EP already reflects the correct position as has been clarified in this response. Therefore, Santos has not made any updates in the EP in response to this comment.</p> <p>In addition to an accepted EP, proponents must have in place a NOPSEMA approved Well Operations Management Plan (WOMP) that details how the LOWC will be prevented; and a Source Control Plan to manage it if it occurs, to minimise the impact.</p> <p>ALARP demonstration</p> <p>The principle of ALARP applies to the environmental impact assessments conducted by Santos. With respect to hydrocarbon spill risk and response planning, this includes an assessment to demonstrate that oil spill response control measures reduce risk to a level that is ALARP consistent with the regulations. Appendix B of the OPEP summarises the oil spill response ALARP framework and guidance documents applied to the oil spill risks of the proposed Bedout Multi-well exploration drilling activity.</p> <p>As per NOPSEMA Guidance Note – ALARP (NOPSEMA 2020), minimising costs is not the goal of an ALARP assessment process. The ALARP principle clearly encompasses a wide range of factors including environmental outcomes, functionality, availability, reliability, survivability, dependency, compatibility, and feasibility (the time, cost, and effort required to implement the control measure). Cost is therefore an element of the feasibility factor. None of the Santos documentation states that cost minimisation is the priority. However, cost is considered as a factor with respect to feasibility, especially when considering the risk and likelihood of unplanned events.</p> <p><u>An additional ALARP assessment and an update of the cost of a subsea first response toolkit (SFRT) vessel has been added to the ALARP assessment worksheets in Appendix B of the OPEP.</u></p> <p><u>Santos has added additional justification in Table 7-22 and Section 7.6.6 of the EP to address this claim.</u></p> <p>Worst case scenarios and tactical response plans</p> <p>Santos cannot comment on correspondence between the EPA and another operator such as Woodside. However, Santos has carefully reviewed the durations to execute a relief well in the Bedout Basin in the event that a worst case LOWC event were to eventuate. Santos has used conservative assumptions such as allowing sufficient time of 28 days to mobilise a MODU from as far as South-East Asia.</p> <p>The OPEP has been developed to describe Santos’ response to a hydrocarbon spill during the Bedout multi well drilling activities. The OPEP has been developed to meet all relevant requirements of the OPGGS(E)R. It is consistent with the National and State (WA) systems for oil pollution preparedness and response, being the <i>National Plan for Maritime Environmental Emergencies</i> (AMSA 2020) managed by</p>
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		<p>AMSA; and the <i>WA State Hazard Plan for Maritime Environmental Emergencies (SHP-MEE)</i> (WA DoT 2024a).</p> <p>Santos has already provided a list of the documents which were considered in the preparation of the OPEP in Sections 3.5 and 3.6, and in Appendix B of the OPEP – therefore has not revised the OPEP to address this claim.</p> <p>The 77-day release period referenced in the EP and OPEP represents the time taken to implement a well kill (i.e. stop the source of the hydrocarbon release) in the remote chance of a LOWC, via the construction of a relief well and execution of a well kill. The key schedule assumptions are presented in Table 9-4 and Table 9-6 of the OPEP. The calculated 77 days is the estimated maximum duration for which an accidental worst-case LOWC event has the potential to release hydrocarbons into the marine environment.</p>
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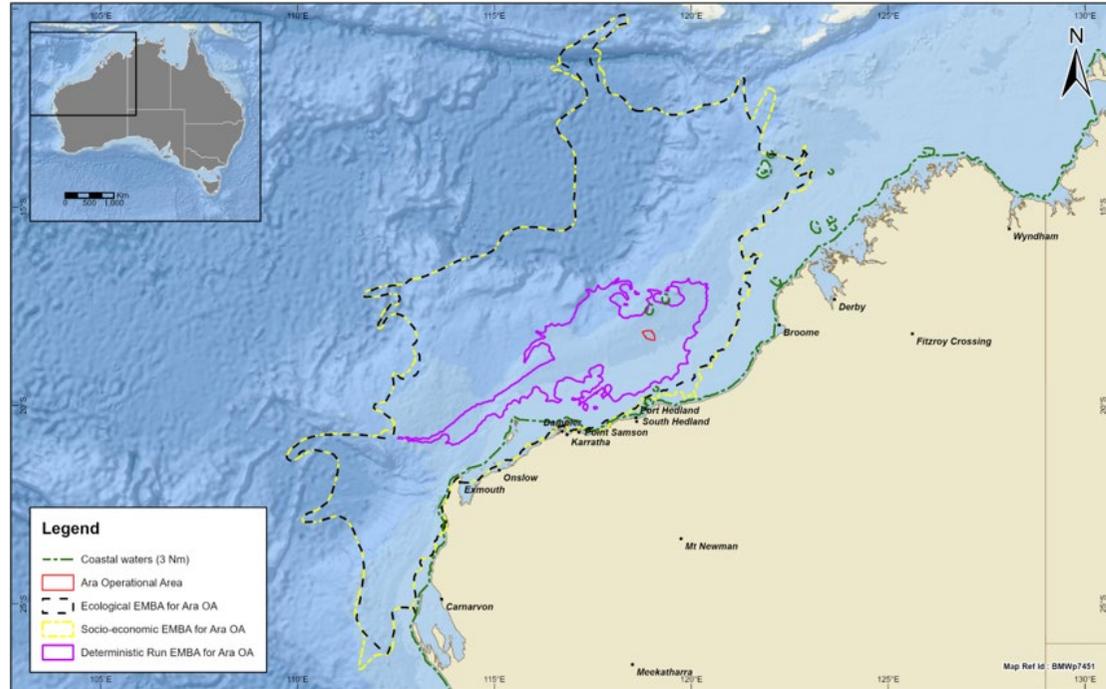
Key matter: Proximity to Rowley Shoals

<p>4RS</p>	<ul style="list-style-type: none"> • <i>Claim: Rowley Shoals marine park is only 40km from the nearest operational area</i> • <i>Claim: Concern about the proposed exploration drilling impact on the local and nearby marine environment and particularly upon the Rowley Shoals Marine Park.</i> • <i>Claim: Potential for spills to impact Rowley Shoals</i> 	<p>Santos notes the claims regarding the potential spill risk to Rowley Shoals Marine Park. Santos has reviewed the EP and OPEP to ensure that these matters are appropriately considered and addressed. Santos does not consider revision to the EP or OPEP is necessary.</p> <p>The Rowley Shoals is a receptor location that surrounds the two marine parks (Clerke Reef Marine Park [MP] and Imperieuse Reef MP), and consists of wholly submerged features, (i.e. there is no shoreline within this receptor). The probability of an incident occurring that may affect the Rowley Shoals environment is estimated to be remote at less than 0.02% (see Table 7-21 of the EP).</p> <p>Santos’ oil spill modelling shows that, in the remote event that a LOWC occurred, the earliest arrival time for shoreline accumulation with the Rowley Shoal was within 4 days, 19 hours. Santos can deploy protection and deflection resources/shoreline clean-up resources to the relevant location within 60-72 hours of shoreline contact (predicted or observed).</p> <p>Santos will locate equipment at its Dampier facilities to support containment and recovery spill response activities. Santos also has access to shared subsea first response toolkit in Jandakot and capping stack in Singapore, including technical expertise and deployment personnel.</p> <p>The claims raised appear to be the result of a misunderstanding as to the probability of that LOWC event taking place. Section 7.6.1 of the EP has been updated to clarify that a LOWC event has a 99.985% likelihood of not occurring, as discussed in response 3 above.</p> <p>The OPEP (Section 14.2) addresses shoreline protection and deflection, and shoreline cleanup in the remote chance of a LOWC Event.</p>
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Key matter: Potential impact to World heritage areas, marine parks and protected species (biodiversity)

<p>5BIO</p>	<ul style="list-style-type: none"> • <i>Claim: The EP fails to adequately manage spill risks through robust</i> 	<p>Santos notes the claims regarding proximity to areas of environmental and cultural sensitivity (including, world heritage listed areas, Commonwealth and WA State marine parks) and has reviewed the EP to</p>
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	<p><i>prevention or mitigation, relying on modelling that inaccurately defines the EMBA and overlooks worst-case scenarios.</i></p> <ul style="list-style-type: none"> • <i>Claim: The proposal poses unacceptable risks of oil spills which could impact World Heritage Areas, and areas of high environmental, biological, cultural and economic significance for West Australians within the proposals ‘environment that may be affected’.</i> • <i>Claim: Santos assumes that marine mammals can simply “move away” from an oil spill, despite the fact that a worst-case scenario oil spill would reach over 1,500 km in length and over 500 km in width if it were to occur.</i> • <i>Claim: This proposal occurs in waters adjacent to internationally significant marine ecosystems.</i> • <i>Claim: Inadequate consideration of potential oil spill impacts to reefs.</i> • <i>Claim: Inconsistent with Recovery Plans or threat abatement plans.</i> • <i>Claim: Impact to dusky sea snakes and marine reptiles</i> 	<p>ensure that this matter is appropriately considered and addressed. Revisions to the EP, where required, are set out below.</p> <p>The maps in the EP (Figure 3-1) showing the Environment That May Affected (EMBA) shows the largest area where all modelled spills could have a potential environmental consequence – it represents the total of all possible spill scenarios, not an individual spill (see below for examples of individual spill modelling in different seasons).</p> <p>In addition, the EMBA and the examples of individual spill modelling below do not consider that the area will be reduced through implementing our spill response plan. Therefore, the area of 1,500 km in length and over 500 km in width is not the expected impact of an unplanned spill.</p> <p>The EP includes the recovery plans, conservation advice and species management plans relevant to the threatened and migratory species that have been identified as potentially occurring within the EMBA.</p> <p>A comprehensive risk and impact assessment is included in the EP. The consequence from planned activities (operational area for planned activities does not contain any sensitive habitats or significant features) is negligible to minor. The residual risk from unplanned events such as a spill is low to very low.</p> <p>Section 7.5 of the EP describes spill scenario selection and 7.6 and 7.7. of the EP addresses a LOWC event, and a hydrocarbon spill of marine diesel oil event.</p> <p>While the EMBA outlines the maximum potential spatial extent of all modelled spill scenarios, a single simulation run (i.e. deterministic) (e.g. the 1,367,291 m³ surface release of Caley crude scenario), more realistically represents a much smaller spatial footprint, and not to the spatial extent as claimed (1500 km x 500 km for a single worst-case spill).</p> <p>As described in Section 7.6 of the EP, in the event of a LOWC, the hydrocarbon released is a condensate and is expected to weather quickly through evaporation and dispersion. Section 7.6.4.2 of the EP explains the exposure durations and expected impacts to marine mammals.</p> <p>An example output of the deterministic runs (three separate figures) showing the predicted low threshold exposure area for a single simulation (winter) following a LOWC event resulting in the maximum swept area with floating oil at, or above, 50 g/m² is presented in Appendix H of the EP, as shown below:</p>
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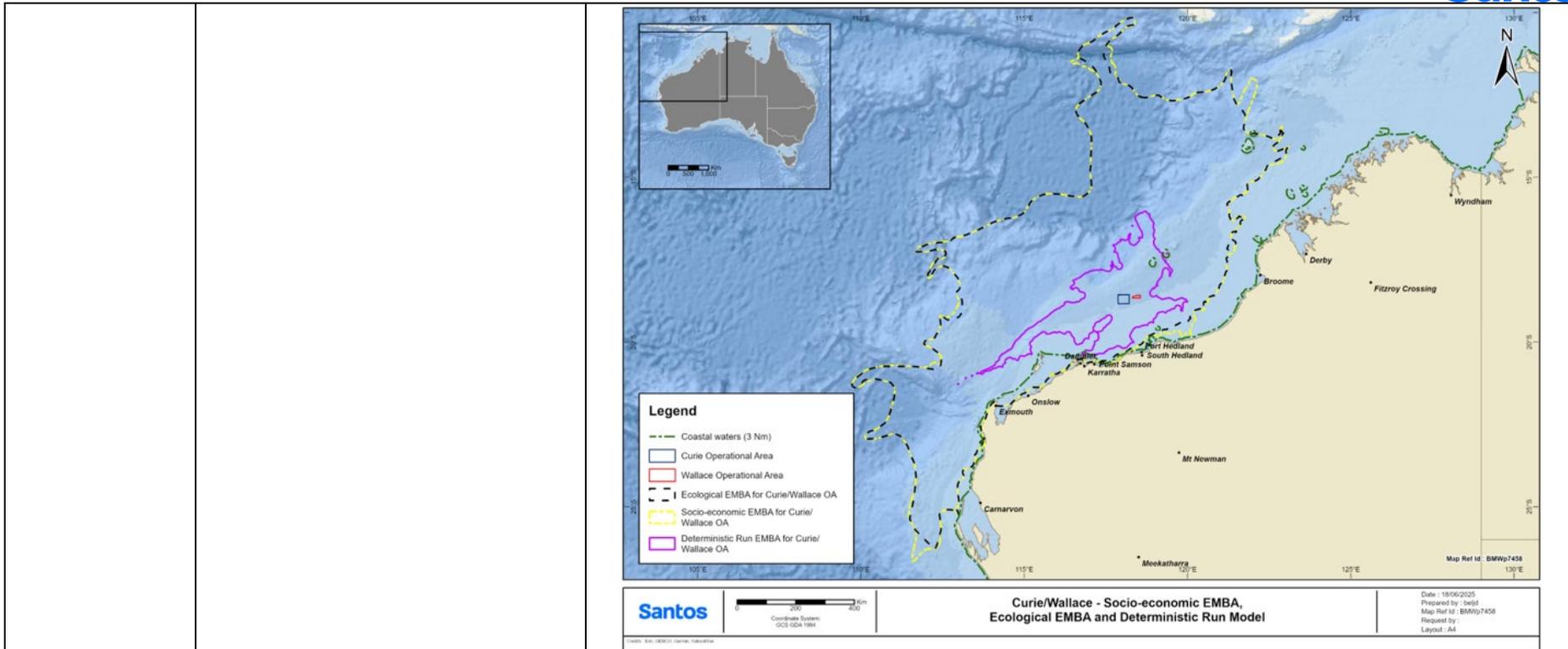
- Legend**
- Coastal waters (3 Nm)
 - Ara Operational Area
 - - - Ecological EMBA for Ara OA
 - - - Socio-economic EMBA for Ara OA
 - Deterministic Run EMBA for Ara OA

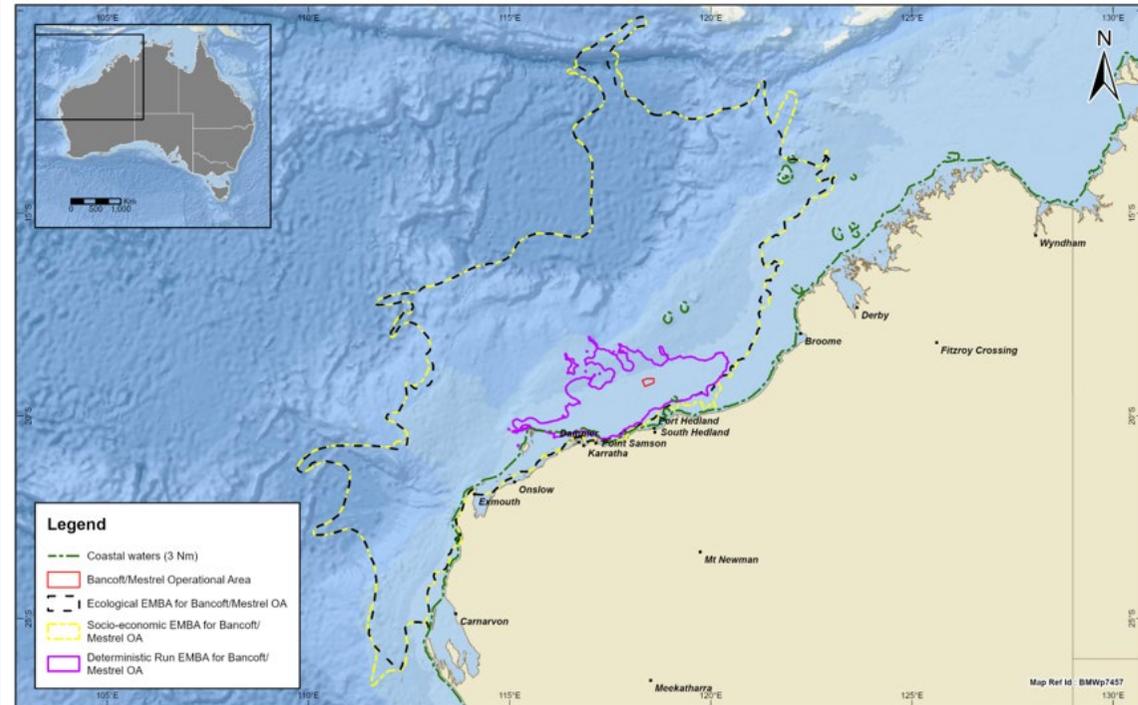
Santos

0 200 400 Km
Coordinate System:
GCS GDA 1984

ARA - Socio-economic EMBA, Ecological EMBA and Deterministic Run Model

Date : 15/06/2025
Prepared by : jehd
Map Ref id : BMWp7451
Requested by :
Layout : A4






0 200 400 km
Coordinate System
GCS GDA 1984
**Bancroft/Mestrel - Socio-economic EMBA,
Ecological EMBA and Deterministic Run Model**
Date: 18/08/2025
Prepared by: belid
Map Ref Id: BMWp7457
Requested by:
Layout: A4

The OPGGS(E)R requires impact assessment of all potential events, including accidental unplanned events, regardless of the likelihood.

Protected and sensitive areas identified in the OAs and EMBA are listed in Table 3-6 and illustrated in Figure 3-4 to Figure 3-8 of the EP. Santos provides a summary of these areas (as described in the EP) below, noting impacts from planned activities typically occur within each OA.

Section 3.2.4 and Section 3.2.5 of the EP set out proximity of the OAs to environmental values and sensitivities. The OAs do not overlap any Australian marine parks (AMPs), State protected areas or key ecological features as summarised below:

- The OAs do not overlap any Australian Marine Parks (AMPs), State protected areas or key ecological features (KEFs). The AMP closest to the Mestrel/Bancroft OA is Eighty Mile Beach AMP (48 km) and the AMP closest to the Ara, Curie, and Wallace OAs is the Argo-Rowley Terrace AMP (40 km, 90 km and 93 km, respectively) (see Table 3-6 of the EP)

		<ul style="list-style-type: none"> • There are no World Heritage Areas (WHAs), National Heritage Listed (NHL) areas or Commonwealth Heritage Listed (CHL) areas within the OAs (see Table 3-6 of the EP) • There are no wetlands of national or international importance within the OAs (see Table 3-6 of the EP) • A search of DCCEEW and National Native Title Tribunal (NNTT) data identified no Indigenous Protected Areas (IPAs) within the OAs (the closest IPA is Nyangumarta Warrarn, located ~110 km south-east of the closest OA (Mestrel/Bancroft) (see Section 3.2.7.1 of the EP) • A search of the Aboriginal Cultural Heritage Inquiry System (ACHIS) identified no registered or lodged Aboriginal heritage sites within the OAs (see Section 3.2.7.1 of the EP) • There are no listed or recorded shipwrecks within or in the vicinity of the OAs (see Section 3.2.7.2 of the EP) • There are no coastal habitats (e.g. mangroves), or recognised reefs, shoals or banks within the OAs (see Section 3.2.4.2.2) • The nearest landmass is Bedout Island, located ~65 km south of the nearest OA (Mestrel/Bancroft) (see Section 3.2.4.1 of the EP). <p>Consistency with Recovery Plans and Threat Abatement Plans</p> <p>Table 3-11 of the EP summarises the recovery plans, conservation advice and species management plans relevant to the threatened and migratory species that have been identified as potentially occurring within the OAs and the EMBA. This table identifies the relevant recovery plans for each species, the threats and strategies identified as relevant to the activity, relevant conservation actions, and where in the EP these matters have been addressed – to show consistency with the recovery plans, conservation advice and management plans for those species.</p> <p>As is set out in Table 3-11 of the EP, relevant conservation actions for the dusky sea snake (<i>Conservation Advice for Aipysurus fuscus (dusky sea snake)</i> (DCCEEW, 2024b)) and the short-nosed sea snake (<i>Approved Conservation Advice for Aipysurus praefrontalis (Short nosed Sea Snake)</i> (TSSC, 2010b)) include avoiding seismic noise within/adjacent to reefs and shoals where the sea snake occurs and ensuring there is no anthropogenic disturbance to in areas where the sea snakes occur. The Scott Reef complex is a critical area for protection of the dusky sea snake (<i>Conservation Advice for Aipysurus fuscus (dusky sea snake)</i> (DCCEEW, 2024b)). This nearest OA to this complex is Ara, 526km away. Seismic noise will not be generated from the activities within or adjacent to the reefs. Santos is consistent with this conservation advice.</p> <p>Santos considers the EP adequately describes the proximity to and potential impact on marine fauna, WHAs, AMPs, NHLs and other sensitive areas. Santos therefore has not made any amendments to the EP to address these claims.</p>
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Key matter: Seismic impacts (noise)

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- *Claim: Proposed acoustic blasting and other noise and light pollution associated with exploration may have a damaging effect on endangered marine and bird life.*
- *Claim: Seismic blasting is cruel and all sea life will be harmed by the activity.*
- *Claim: Seismic activity from blasts from an airgun used to map the geological profile of the ocean floor. This activity is particularly concerning. The proposal to use loud blasts of 160dB, which will continue every few seconds for 18 hours each time a survey is conducted.*
- *Claim: Seismic blasts can be heard underwater for thousands of kilometres.*

Santos notes the claims regarding noise impacts (through seismic activities) and has reviewed the EP to ensure that this matter is appropriately considered and addressed in section 6.4 of the EP. Revisions to the EP, where required, are set out below.

The terminology of Vertical Seismic Profiling (VSP) used in the EP to describe the acquisition of acoustic data for depth verification may have caused confusion. Conventional seismic activities are not proposed under this EP. The relatively low-level noise emissions from VSP activities compared to conventional seismic surveys, combined with the short duration of VSP (<12 hours), means that the risk to marine fauna is very low.

Santos has updated sections 6.4 of the EP to clarify the difference between conventional seismic survey and the method that will be used in the well bore. Section 6.4 of the EP now refers to the process as “Vertical Acoustic Profiling (VAP)”. This is a more accurate description of the process and represents the boom type of noise (similar to a gas cannon gun used to deter birds from fruit crops). The acoustic noise in the wellbore is then detected and measured with a fibre optic cable along the full vertical length, to assist understanding of the local geology.

The activity does not occur within any critical habitat such as resting, feeding, calving or confined migratory pathways, nor will it occur within any world heritage sites.

Given the transient and mobile nature of marine mammals, and the short-term nature of the VAP activities, the impact of noise on marine mammals is expected to be limited.

Santos has updated the EP to include a control measure (BB-CM-27). This control measure adopts the use of a marine fauna observer as part of VAP activities, as follows:

Prior to conducting VAP, a fauna observation period will be undertaken by a crew member on the MODU who has received training in sighting and reporting of marine fauna. Fauna observers are typically stationed on the heli-deck to take advantage of clearer views and greater height for better ability to observe any nearby fauna.

This will be performed for a minimum of 30 minutes within 3 hours of the (VAP) commencing. If fauna is detected within the exclusion zone, the activity will be shut down until they move on.

Any nearby support vessels will also be asked to report any marine fauna sightings at this time.

Santos considers this is an appropriate control measure (BB-CM-27) given the short duration of VAP activities of <12 hours.

Key matter: Lighting impacts		
7LI	<ul style="list-style-type: none"> • <i>Claim: Light pollution associated with exploration may have a damaging effect on endangered marine and bird life. More research needs to be done to research how marine and bird species will be affected.</i> • <i>Claim: Pollution from industrial light would impact all coastal environments including coral reefs, mangroves and seagrass communities.</i> 	<p>Santos notes the claims regarding potential lighting impacts on marine species and coastal environments and has reviewed the EP to ensure this matter is appropriately considered and addressed in section 6.3 of the EP. Santos does not consider revision to the EP is necessary.</p> <p>There will be lighting required to undertake this activity, however the EP details how the activity will be undertaken in a manner which minimises the extent of lighting impacts.</p> <p>The potential impact of lighting has been assessed in the EP - the impact to turtles, fish, sharks and sea birds will be limited to short-term behavioural effects with no impact at population level. Based on light radiance modelling, light emissions would not be visible at coastal environments and therefore impact to turtle nesting/hatchlings is unlikely. This is consistent with <i>National Light Pollution Guidelines for Wildlife</i> (DCCEEW, 2023a). In line with these guidelines, the EP has assessed the potential for light impacts within 20 km of the OAs (Commonwealth of Australia, 2023).</p> <p>The intensity of the lighting will be primarily dictated by operational safety and navigational requirements, in accordance with the <i>Navigation Act 2012 (Cth)</i> Navigational and safety lighting will be required on a 24-hour basis for the duration of the activity.</p> <p>MODU and vessels will typically use external lighting at night to ensure safe navigation and operations. This lighting, usually bright white (e.g. metal halide, halogen, fluorescent), is similar to that used in other offshore activities such as fishing and shipping.</p> <p>Flaring is an intermittent source of light emission which, if undertaken, will last ~24–48 hours per well, over a period of 2–5 days.</p> <p>Section 6.3 of the EP provides a description of the extent and duration of light emissions from the activity and contains a detailed assessment of the potential impacts associated with lighting on threatened, migratory or local fauna (marine mammals, marine turtles, sharks, rays, fish, and seabirds), cultural receptors (totemic species), seagrass communities and coastal environments.</p> <p>Santos considers the EP adequately assesses and addresses lighting impacts of the activity to an ALARP and acceptable level and has not made any amendments to the EP to address this claim.</p>
Key matter: Data gaps		
8DG	<ul style="list-style-type: none"> • <i>Claim: Data gaps exist for impacts on affected species, potentially resulting in the down- playing of impacts or under-estimation of risk.</i> 	<p>Santos notes the claims regarding data gaps and has reviewed the EP to ensure this matter is appropriately considered and addressed. Santos does not consider revision to the EP is necessary.</p> <p>Appendix C of the EP, describes the EMBA and includes details of the relevant values and sensitivities of that environment, as required by the Commonwealth OPGGS(E)R.</p> <p>In addition to Appendix C, Santos has also prepared the <i>Operational and Scientific Monitoring Bridging Implementation Plan: North West Shelf (7715-650-ERP-0002) (OSM-BIP)</i> which provides monitoring</p>

		<p>guidance and arrangements for all Santos activities referred to in the North West Shelf Region. This document is publicly available as part of the EP submission.</p> <p>Santos considers the data and information used to inform the EP is adequate and has not made any amendments to the EP to address this claim.</p>
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Key matter: Cumulative impacts

<p>9CI</p>	<ul style="list-style-type: none"> • <i>Claim: The area also contains other oil and gas proposals, which could produce cumulative impacts to the environment.</i> • <i>Claim: Cumulative impacts from multiple offshore petroleum activities, climate change and fisheries depletion are not properly assessed.</i> 	<p>Santos notes the claims regarding cumulative impacts to the environment and has reviewed the EP to ensure this matter is appropriately considered and addressed in section 6 (Planned Activities) and section 7 (Unplanned Events) of the EP. Santos does not consider revision to the EP is necessary.</p> <p>Whilst not planned to occur, Santos has addressed the cumulative impacts of concurrent activities (e.g. both a jack-up and semi-submersible drill rig drilling concurrently within separate OAs) for planned activities (Section 6) and unplanned events (Section 7) within the EP.</p> <p>Other oil and gas operators</p> <p>Santos identified oil and gas operators whose titles are within the EMBA as part of the relevant persons identification detailed in Section 4 of the EP. Santos consulted these operators and did not receive feedback that would suggest other petroleum activities are proposed within proximity of the OAs for this EP.</p> <p>Based on searches undertaken by Santos during development of the EP, it is unaware of any other offshore regulatory approvals that are proximate to the OAs that may give rise to cumulative impacts.</p> <p>Other activities</p> <p>The EP has considered broader climate change issues in Section 6.5 of the EP.</p> <p>Santos notes fisheries depletion is a global issue. The EP considers potential impacts to fish, including commercial fish species, in the planned activities and unplanned events sections of the EP.</p> <p>Santos considers the EP adequately assesses cumulative impacts of the activity and has not made any amendments to the EP to address this claim.</p>
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Key matter: Public comment period

<p>10PC</p>	<ul style="list-style-type: none"> • <i>Claim: Concern that the comment process has been opened over the busy holiday period, presumably so less people notice and have the time to make a submission.</i> 	<p>Santos notes the claim regarding the public comment period occurring over a holiday period.</p> <p>NOPSEMA, as the decision maker, defines the public comment period in accordance with the OPGGS(E)R, and set this period from 9 December 2025 to 8 January 2026.</p> <p>Santos has not made any amendments to the EP to address this claim.</p>
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Key matter: Impact to recreational activities		
<p>11RA</p>	<ul style="list-style-type: none"> • <i>Claim: Concern regarding impact to recreational diving at Rowley Shoals.</i> • <i>Claim: The scale of the spill would make the local waters unusable for recreational swimming.</i> • <i>Claim: Fails to meaningfully recognise existing public and community use of the marine environment, including recreational fishing, tourism and charter operations associated with high-value areas such as Ningaloo and adjacent marine parks.</i> 	<p>Santos notes the claims regarding impact to recreational activities and has reviewed the EP to ensure this matter is appropriately considered and addressed. Revisions to the EP, where required, are set out below.</p> <p>The EP considers and recognises public, community and recreational use of high values areas, and contains appropriate measures to address the risk of planned impacts and unplanned events on these areas.</p> <p>Although there is less than 0.02% chance a loss of well control resulting in a spill, the EP includes plans to respond to a worst-case spill, in the remote chance that a spill occurs. NOPSEMA will assess the EP to ensure the risks and impacts are reduced to as low as reasonably practicable and acceptable, in accordance with the Regulations.</p> <p>Section 3 of the EP describes the Environmental Values and Sensitivities of the EMBA, and further detail regarding concerns raised is provided below.</p> <p>There are several sections of the EP where use of the marine environment as it relates to recreational, fishing, tourism and charter operations has been identified, for example:</p> <ul style="list-style-type: none"> • Section 3.2.5 Protected and significant areas including marine parks (e.g. Ningaloo AMP, Rowley Shoals) • Australian and state marine management zones (Table 3-7) • State managed fisheries (Table 3-12) • Section 3.2.7.4 Recreational fisheries • Section 3.2.7.5 Tourism and recreation, including diving activities. <p>Impact to social and economic receptors (encompassing recreational) has been addressed in each Planned Activities and Unplanned Events environmental impact assessment section of the EP (e.g. Section 6.1.4, 6.2.4, 6.3.4).</p> <p><u>Santos has updated Section 3.2.7.5 of the EP to acknowledge recreational diving may occur at the Argo Rowley Terrace AMP.</u></p> <p>Santos considers the EP adequately considers and recognises public, community and recreational use of high values areas, and contains appropriate measures to address the risk of planned impacts and unplanned events on these areas.</p>
Key matter: Impact to marine fauna		
<p>12MF</p>	<ul style="list-style-type: none"> • <i>Claim: Increased activity and movement in these areas has the potential to cause physical and</i> 	<p>Santos notes the claims regarding potential for injury or mortality to marine fauna exists in the event of a collision or entanglement during operations and has reviewed the EP to ensure this matter is appropriately considered and addressed in section 7.3 of the EP ‘marine fauna interaction’. Revisions to the EP, where required, are set out below.</p>

	<p><i>behavioural changes to marine fauna.</i></p> <ul style="list-style-type: none"> • <i>Claim: There is a high risk of marine fauna/vessel collisions in an area with a sudden escalation of vessel movement where before there was little to none.</i> • <i>Claim: There is insufficient evidence provided for the capability of the Proposal to address the risk of vessel collision with marine fauna or to apply soft start procedures.</i> • <i>Claim: The area also contains migratory routes for several other listed species, including the Blue Whale, Pygmy Blue Whale and Humpback Whale.</i> 	<p>Table 3-11 of the EP summarises how Santos has addressed relevant conservation actions for marine fauna, including marine mammals.</p> <p>Vessel strikes are a well understood risk in maritime operations, including commercial shipping and fishing. Several standard control measures to manage the risk of vessel interactions are set out in the EP. All vessel operations will comply with relevant maritime standards and EPBC regulations to minimise risks to marine fauna. Controls that reduce the risk of harm to cetaceans, whale sharks and turtles, including Soft Start procedures are included in Table 8-2 of the EP.</p> <p>Section 7.3 of the EP addresses marine fauna interaction, and further detail regarding concerns raised is provided below.</p> <p>Santos has added an additional control measure (BB-CM-27) to the EP to address fauna interaction during VAP activities as follows:</p> <p><u>Prior to conducting VAP, a fauna observation period will be undertaken by a crew member on the MODU who has received training in spotting and reporting of marine fauna. This will be performed for a minimum of 30 minutes within 3 hours of the (VAP).</u></p> <p><u>Fauna observers are typically stationed on the heli-deck to take advantage of clearer views and greater height for better ability to observe any nearby fauna. Any nearby support vessels will also be asked to report any marine fauna sightings at this time.</u></p> <p>Santos considers this is an appropriate control measure given the short duration of VAP activities of <12 hours.</p> <p>Santos acknowledge the risk of marine fauna interactions, and considers the EP adequately assessed and addressed the impacts of the activity to an ALARP and acceptable level. As is set out in response to claim 6NI above, section 6.4 of the EP has also been updated to include the use of a marine fauna observer during VAP activities to further reduce the risk of impact to marine fauna.</p>
<p>Key matter: Discharge impacts</p>		
<p>14DI</p>	<ul style="list-style-type: none"> • <i>Claim: Concerns regarding risk of pollution of the seawater.</i> • <i>Claim: Discharge from vessels will have a significant negative effect on the pristine marine environment.</i> • <i>Claim: Pollution from industrial discharge would impact coastal environments including coral reefs,</i> 	<p>Santos notes the claims regarding discharge impacts and has reviewed the EP to ensure this matter has been appropriately considered and addressed in:</p> <ul style="list-style-type: none"> • section 6.6 of the EP, which describes the types of operational discharges from the MODU and vessels along with the assessment of potential impacts on the marine environment; and • section 6.7 of the EP, which describes the types of discharges from drilling activity along with the assessment of potential impacts on the marine environment. <p>Santos does not consider revision to the EP is necessary.</p> <p>Santos acknowledge the risk of marine discharges, and considers the EP adequately assessed and addressed the impacts of the activity to an ALARP and acceptable level. The discharges arising from</p>

	<p><i>mangroves and seagrass communities.</i></p>	<p>vessels, MODU and drilling discharges have all been assessed as having a negligible consequence and therefore are not anticipated to have a significant effect on the marine environment. The drilling activities are located offshore and are not within close proximity to coastal communities including mangroves and seagrass communities and will not be impacted by the drilling activities. Santos has not made any amendments to the EP to address this claim.</p>
<p>Key Matter: Impacts to Fisheries</p>		
<p>15FI</p>	<p><i>Claim: Approval would expose vulnerable fisheries to unacceptable environmental risk.</i></p> <p><i>Claim: A number of fisheries are located within the proposals OA and EMBA, including fisheries for economically important species in WA such as Western Rock Lobster, scallops, abalone and prawns. Demersal Scalefish Fisheries, which have recently been closed due to severe stock depletion threatening population collapse, also overlap both the OA and EMBA.</i></p>	<p>Santos notes the claims regarding impact to fisheries and has reviewed the EP to ensure this matter has been appropriately considered and addressed. Santos does not consider revision to the EP is necessary.</p> <p>Potential impacts to fisheries is expected to be limited to operational inconveniences, such as brief displacement from fishing grounds around the operating areas and exclusion zones and will only last for the short duration of the activities.</p> <p>Section 6.1 of the EP addresses impact to other marine users – including fisheries and further detail regarding concerns raised is provided below.</p> <p>Santos considers the EP appropriately addresses impact to fisheries through:</p> <ul style="list-style-type: none"> • Planned activities as follows: <ul style="list-style-type: none"> ○ displacement from the OAs is considered and assessed in Section 6.1.2 of the EP. • Unplanned events as follows: <ul style="list-style-type: none"> ○ invasive marine species (Section 7.2), ○ loss of well control (Section 7.6), ○ hydrocarbon spill (marine diesel oil) (Section 7.7 of the EP). <p>The State Pilbara Demersal Scalefish fisheries (includes trawl, trap and line fisheries) have been active in recent years over the OAs (see Section 3.2.7.3), specifically the Pilbara fish trawl (Interim) managed fishery which has catch in the Mestrel/Bancroft OA (Table 3-12). There is potential for interaction with this state commercial fishery during the activities in these OAs. However, in December 2025, the WA government implemented management changes across the state to protect at-risk demersal fish and help stocks recover for future generations. In the Pilbara region, recreational and charter fishing will remain open; a 50% catch reduction for commercial fisheries from 1 January 2026; and permanent closure of commercial trawl fishing for demersal scalefish from 1 January 2026.</p> <p>Due to the distance offshore it is unlikely recreational fishing will take place within the OAs. Recreational fishing and tourism are likely to occur within shallower waters closer to the mainland coast inshore and around reefs located outside of the OAs.</p>

		<p>Section 6.4.2.4 refers to the short duration VAP activities and survey activities are not anticipated to result in any impacts, particularly given the lack of commercially exploited invertebrate stocks (e.g. pearl oysters, rock lobsters) in the OAs.</p> <p>Santos has not made any updates to address this specific claim. However, Santos notes that Section 6.1.2.1 of the EP has been updated to include information on the recent Government introduced Demersal fishing reforms.</p>
<p>Matter: Peer review</p>		
<p>16PR</p>	<ul style="list-style-type: none"> <i>Claim: Request independent peer review and reopening of public comment period once review is completed.</i> 	<p>Santos notes the claim.</p> <p>Santos has followed the public comment process as set out under the OPGGS(E)R and in accordance with NOPSEMA guidance. Santos notes that, NOPSEMA will consider the public comments and, assess whether Santos has taken these into account through its assessment of the EP, when determining if the acceptance criteria of the OPGGS(E)R have been met.</p>
<p>Matter: Proponent environmental compliance history</p>		
<p>18EC</p>	<ul style="list-style-type: none"> <i>Claim: The Proponent's past compliance breaches need to be carefully considered by the regulator to ensure that any environmental management problems have been suitably rectified.</i> 	<p>Santos notes the claim regarding past compliance and has reviewed the to ensure that it contains suitable monitoring and compliance procedures.</p> <p>Whilst the EP contains administrative controls, there are also other higher effectiveness controls which have been adopted, see control measure evaluation tables in Section 6 and 7 of the EP and Table 8-2 .</p> <p>Section 8.8 to 8.11 of the EP provides further detail on incident reporting, notifications, audits and reviews. Environmental recordable and reportable incidents will be reported to NOPSEMA as required, in accordance with Table 8-4 of the EP.</p>
<p>Matter: General objection</p>		
<p>19GO</p>	<p><i>Claim: General objection to the oil and gas industry.</i></p>	<p>Santos notes the public comments concerning a broader objection to the oil and gas industry.</p> <p>Gas will continue to play a critical role as a flexible and dependable source of energy for decades to come.</p> <p>At Santos, our goal is to backfill and sustainably grow our oil and gas portfolio to meet growing energy demand and provide reliable, affordable energy the world needs for modern life and human progress, to help create a better world for everyone.</p> <p>If this EP is accepted by NOPSEMA, Santos will undertake the proposed activities in a manner by which the environmental impacts and risks of the activity will be reduced to a level that is ALARP and acceptable.</p> <p>Where appropriate, Santos has revised this EP to address the public comments received however, it has not made amendments to the EP address objections to the industry generally.</p>