

Australian Gas Infrastructure Group

2024 Compliance Assessment Report – MS 112 & MS 1209

JBS&G 67730 14 November 2024





We acknowledge the Traditional Custodians of Country throughout Australia and their connections to land, sea and community.

We pay respect to Elders past and present and in the spirit of reconciliation, we commit to working together for our shared future.

Caring for Country The Journey of JBS&G Artist: Patrick Caruso, Eastern Arrente



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Abbreviations

Term	Definition
AGID	AGI Development Group Nominees Pty Limited
AGIG	Australian Gas Infrastructure Group
ASW	Ashburton West Facilities
САР	Compliance Assessment Plan
CAR	Compliance Assessment Report
DWER	Department of Water and Environmental Regulation
GHG	Greenhouse Gas



1. Introduction

1.1 Project Background

On 8th October 1990, the Minister for the Environment released Ministerial Statement 112 (MS112) under the *Environmental Protection Act 1986* (EP Act) for the development of the Tubridgi Gas Field. This statement scope includes the Tubridgi Gas onshore wells, flowlines, gas processing plant and the Tubridgi Lateral pipeline.

The Tubridgi Gas Field was initially commissioned in 1991 by Doral Resources. BHP (formerly known as BHP Billiton) acquired the Tubridgi Gas Field in 2005, conducted reinjection and storage trials in 2006 and later plugged and abandoned all wells in 2011. DBP Development Group Nominees Pty Ltd (DDG) acquired the Tubridgi Gas Field and all obligations under MS112 in 2012.

In October 2016, construction commenced on the Tubridgi Gas Storage Facility (TGS), a subsurface natural gas injection and extraction facility.

In July 2020, DDG informed the Department of Water and Environmental Regulation (DWER) of a name change. DDG is now AGI Development Group Nominees Pty Limited (AGID).

A Section 46 application was submitted in early 2021 to DWER to update a single commitment in relation to heritage management to match the existing agreement with the Traditional Owners. On 15th August 2023, the Minister for the Environment released the section 46 amendment to MS112, MS1209, under the EP Act for the expansion of the Tubridgi Gas Development. This application was to upgrade the existing process facilities, construct four wells and install new flowlines to increase the withdrawal capacity of stored gas to 70 TJ/day.

Operation of the Tubridgi Gas Storage Facility (i.e. the onshore wells and flowlines) is regulated by the Department of Energy, Mines, Industry Regulation and Safety (DEMIRS) via Production Licence (L9) issued under the Petroleum and Geothermal Energy Resources Act 1967. Other infrastructure approved under MS112, including the operational Tubridgi Lateral and gas processing plant is also regulated by DEMIRS via Pipeline Licence 16 (PL16), issued under the *Petroleum Pipelines Act 1969*. Associated with these licences, the following DEMIRS approved Environment Plans (EP) are (or have been) in place:

- TGS Operations Environment Plan (covering injection and withdrawal operations);
- TGS Project Flowlines Environment Plan [E-PLN-043 Rev 7] (covering the construction and commissioning of TGS project flowlines)
- Ashburton West (ASW) Environment Plan (covering the adjacent gas interconnector plant and the Tubridgi Lateral pipeline).

During the reporting period, the Tubridgi Lateral was operational, enabling the delivery of gas from the DBNGP to the Tubridgi Gas Storage Facility as required. Operations continued within TGS with the injection and withdrawal of gas from the associated wells.

1.2 Proponent

In a letter dated 16 February 2012, BHP and DBP Services Co Nominees Pty Ltd (changed name to DBP Development Group Nominees Pty Ltd, DDG) jointly requested the transfer of proponent of MS112 from BHP to DDG. Nomination of DDG as proponent for MS112 was formally accepted by the Environmental Protection Authority (EPA) in correspondence dated 10 September 2012.

In July 2020, DDG informed the DWER of a name change. DDG is now AGI Development Group Nominees Pty Limited (AGID).

AGID is operated as part of the Australian Gas Infrastructure Group (AGIG) and is 100% owned by a consortium comprising CK Infrastructure Holdings Limited (CKI), CK Asset Holdings Limited (CK Asset) and Power Asset



Holdings Limited (Power Asset). CKI, CK Asset and Power Assets are members of the CK Group, a large privately owned, Hong Kong public listed global group with investments in energy infrastructure.

1.3 Objectives and Scope

The objective of this document is to provide the EPA an assessment against compliance with conditions set out in MS 112 and MS 1209. Specifically, the scope of this report covers the period commencing 15 August 2023 to 14 August 2024.

1.4 Proponent Details

The details of the proponent are detailed below in Table 1.1.

Table 1.1: Proponent Details

Subject	Detail
Project:	Tubridgi Gas Field Development, Near Onslow
Proponent:	AGI Development Group Nominees Pty Limited (AGID).
ACN:	153 396 911
Proponent Address:	Level 22, 140 St Georges Terrace
	Perth WA 6000

2. Current Implementation Status

During the reporting period, the Tubridgi Lateral was operational, enabling the delivery of gas from the DBNGP to the TGS as required. Operations continued within TGS with the injection of gas into the associated wells and testing of the withdrawal process. Key activities conducted under MS112 / MS1209 included:

- Operation of the Tubridgi Gas Field as a Gas Storage Facility;
- Flowline construction;
- Five-year pressure shutdown valve inspection and testing
- Intelligent pigging
- Four-year internal pressure vessel and piping inspections
- Production tubing wireline integrity survey
- TGS tower and communication maintenance;
- Aerial Surveillance;
- Maintenance of access tracks;
- Rehabilitation monitoring; and
- Wellhead and ongoing plant management, including maintenance.

There was 8.343 ha cleared under MS1209 in the reporting period as part of the Tubridgi Expansion Project for the purposes of flowlines and anodes for the new production wells TRW 2, 8, 10 and exploratory well TCW 11. A further 6.24 ha was cleared for the TRW 2, 8, 10 and TCW well pads under Environmental Protection (Clearing of Native Vegetation) Regulation 2004 exemption Regulation 5 item 20 Schedule 1.



3. Audit Methodology

This Compliance Assessment Report (CAR) addresses the current status and compliance of operations at the Project with respect to the conditions in MS 112, the consolidated list of commitments attached to it and MS 1209.

3.1 Audit Period

This CAR addresses the 12-month reporting period from 15 August 2023 to 14 August 2024.

3.2 Audit Criteria

This assessment was conducted in accordance with the 'Development and Operation of the Tubridgi Gas Field, Ministerial Statement 112 & 1209' Compliance Assessment Plan (JBS&G 2024). The audit table contains each condition separated into audit elements for auditing purposes (i.e. the audit criteria), and includes the following headings:

- Audit code: Ministerial Statement reference number
- Subject: the environmental theme/issue
- Requirement: what the proponent must do
- How: the manner in which the requirements of an audit element should be achieved
- Evidence: information or data collected to verify compliance, i.e. report/letter/site inspection requirements
- Phase: project phase applicable to audit element
- Timeframe: specific timing for achieving the requirements of an audit element
- Status: notes about the fulfilment of compliance using compliance status terms
- Further information: additional comments to support compliance findings, where required.

3.3 Methodology

The desktop audit was undertaken by lead auditor Andrea Wills of JBS&G with interviews with personnel in Table 3.2 and review of relevant documents.

Table 3.1: Persons consulted during audit

Person & Position	Organisation	Purpose
JZ Khoo	AGIG	Provision of Evidence and Verification of Proposal compliance
Melanie Kenny	AGIG	Provision of Evidence and Verification of Proposal compliance

3.4 Terminology

All conditions have been assessed and assigned a compliance status as defined in Table 3.3 below.

Abbreviation	Definition
С	Implementation of the proposal has been carried out in
	accordance with the requirements of the audit element.
CLD	A requirement with a finite period of application has been
	satisfactorily completed.
NR	The requirements of the audit element were not triggered
	C CLD

Table 3.2: Action implementation status (adapted from OEPA [2012b])



		during the reporting period.
Potentially non-compliant	PNC	Possible or likely failure to meet the requirements of the audit
		element.
Non-compliant	NC	Implementation of the proposal has not been carried out in
		accordance with the requirements of the audit element.
In process	IP	Where an audit element requires a management or monitoring
		plan be submitted to the DWER or another government agency
		for approval, that submission has been made and no further
		information or changes have been requested by the DWER or
		the other government agency and assessment by the DWER or
		other government agency for approval is still pending.

4. Statement of Compliance

Compliance with the 11 applicable conditions of MS 112 / MS 1209 (Appendix D) and 22 relevant consolidated commitments for the Project (Appendix E) have been assessed. A statement of compliance is included in Appendix C.

4.1 Details of the declared compliance status with Ministerial Statement

This assessment of compliance with the MS 112 / MS 1209 approval for this auditing period has found of the 28 sub-conditions that:

- 20 conditions were assessed as compliant with one of those 'compliant complete';
- Six conditions were assessed as not relevant at this time (NRATS);
- One condition was assessed to be potentially non-compliant.

The potential non-compliance relates to the compliance assessment plan being submitted after the commencement of clearing for the flowline project.

Statement of Compliance is also completed and forms part of this submission (Appendix C).

4.2 Details of the declared compliance status with Consolidated Commitments

This assessment of conformance with the 27 consolidated commitments associated with MS112 for this auditing period has found that:

- 20 commitments were assessed to be compliant
- Three commitments were assessed to be not applicable
- Four commitments were assessed to be not determined
- Zero commitments were assessed to be potentially non-compliant

5. Environmental Management Plan Status

5.1 Compliance with Rehabilitation Plan

The Tubridgi Gas Storage Project Operational Environment Plan Addendum (Tubridgi Gas Storage Project – Flowlines (E-PLN-043)) has been implemented and the assessment (Appendix F) found:

• Three commitments were assessed as compliant



- Two commitments were assessed as not applicable
- Zero commitments were assessed as potentially not conformant

5.2 Compliance with Environmental Management and Monitoring Programme

Conformance with the Environmental Management and Monitoring Programmes associated with MS112 / MS1209 was assessed for the reporting period:

- Tubridgi Gas Storage Project Operations Environment Plan (TGSOEP) [E-PLN-023] (Appendix G) and
- Tubridgi Gas Storage Project Wells, Flowlines and Facilities Construction Environmental Management Plan (CEMP) [E-PLN-042] (Appendix H)

The assessment found for 57 commitments in the TGSOEP that:

- 34 commitments were assessed as compliant
- 22 commitments were assessed as not applicable
- One commitment was assessed as potentially non-compliant

The potential non-compliance relates to the requirement for a System Audit to confirm compliance to the Hazardous Materials Handling and Storage Procedure once every three years that has not been completed. The last Systems Audit in April 2021 did not audit hazardous materials handling.

The assessment found for 45 commitments in the CEMP that:

- 33 commitments were assessed as compliant
- Two commitments were assessed as not applicable
- 11 commitments were assessed as potentially non-compliant

The potential non-compliances related to:

- The CEMP required a HSE Systems audit to be undertaken during flowline clearing to confirm clearing works were undertaken in accordance with the Native Vegetation Clearing Procedure (E PRO- 002)
- Aerial surveillance of the flowlines is not being undertaken to monitor:
 - o areas recently cleared
 - o erosion
 - o weeds
- Waste transfers (type and volume) for the flowline construction project were not being reported quarterly (Quarterly Emissions and Discharges Reports)

5.3 Compliance with Cultural Heritage Management Plan

The CHMP was submitted to DWER in the reporting period. AGID received feedback on 30/07/2024 and prepared a response which was submitted with Revision 1 of the CHMP after the reporting period on 04/09/2024. Compliance with the CHMP has not been assessed in this CAR.

6. Corrective, remedial and preventative actions

6.1 Corrective Actions

Corrective actions that are to be implemented to address non-compliances are presented in Table 6.1.



Table 6.1: Action implementation status (adapted from OEPA [2012b])

Non-compliance	Corrective Action	Progress
The compliance assessment plan was submitted after the commencement of clearing for the flowline project.	Compliance Assessment Plan was submitted 07 May 2024.	Complete
Hazardous Materials Handling and Storage Procedure Audit has not been completed once every three years	A Hazardous Materials Handling and Storage Procedure Audit is proposed for 2025	Planned for 2025
The CEMP required a HSE Systems audit to be undertaken during flowline clearing	 Future projects will require HSE Field Audit to confirm the following and record with the ACV document: Rehabilitation and reinstatement of non-operational areas Segregation of topsoil and subsoil Topsoil stockpiles to not exceed 2 m in height Reinstatement of soil profile following excavation Ripping of compacted subsoil before reinstating topsoil 	To be implemented for future projects
Aerial surveillance of the flowlines is not being undertaken	Aerial surveillance of flowlines will commence monthly and monitor for erosion, weeds and rehabilitating area	To be implemented
Waste transfers (type and volume) for the flowline construction project were not being reported quarterly (Quarterly Emissions and Discharges Reports)	Correct E&Ds will be included in DEMIRS AER and future Tubridgi Gas Storage Project –Flowlines Environment Plan [E-PLN-043] E&Ds will be included in the TGSO EP Quarterly Report.	In preparation



6.2 **Opportunities for Improvement**

The following opportunities for improvement have been identified for the TGS Operations EP:

- Ensure unplanned emissions events are reported in the DEMIRS Emissions and Discharges Quarterly Report
- Add checks of the specific required chemical signage to the Weekly HSE inspection checklist.
- OFI: Future HSE System Audits check:
 - Selected personnel are trained in responding to fires.
 - o All prohibited items are kept away from hazardous areas.
 - Permit to Work and Hot Works Certificate including gas testing for hazardous areas as per the Hot Works Procedure

7. Revision of CAP

The current revision of the Compliance Assessment Plan (CAP) (JBS&G 2024) is Revision 1 dated 13 May 2024. There are no plans to update the CAP at this stage.

8. References

- JBS&G 2024 Development and Operation of the Tubridgi Gas Field, Ministerial Statement 112 & 1209 Compliance Assessment Plan for AGID 13 May 2024.
- Office of Environmental Protection Authority (OEPA) 2012b, *Post Assessment Guideline for Preparing an Audit Table*, OEPA, Perth, August 2012.
- Office of Environmental Protection Authority (OEPA) 2012d, *Post Assessment Guideline for Preparing a Compliance Assessment Report*, OEPA, Perth, August 2012.



Appendix A Ministerial Statement MS112

State #



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WESTERN AUSTRALIA MINISTER FOR THE ENVIRONMENT

STATEMENT THAT A PROPOSAL MAY BE IMPLEMENTED (PURSUANT TO: THE PROVISIONS OF THE ENVIRONMENTAL PROTECTION ACT 1986)

TUBRIDGI GAS FIELD DEVELOPMENT, NEAR ONSLOW

This proposal may be implemented subject to the following conditions:

- 1. In implementing the proposal, the proponent shall fulfil the commitments (which) are not inconsistent with the conditions or procedures contained in this statement) made in the Consultative Environmental Review and in responses to issues raised during the assessment. (A copy of the consolidated list of commitments is attached).
- 2. Subject to these conditions, the manner of detailed implementation of the proposal shall conform in substance with that set out in any designs, specifications, plans or other technical material submitted by the proponent to the Environmental Protection Authority with the proposal. Where, in the course of that detailed implementation, the proponent seeks to change those designs, specifications, plans or other technical material in a way that the Minister for the Environment determines on the advice of the Environmental Protection Authority and the Department of Mines, is not substantial, those changes may be effected.
- 3. Prior to the commencement of any siteworks, the proponent shall prepare a rehabilitation plan. The plan shall be prepared and implemented to the satisfaction of the Minister for the Environment on advice from the Department of Agriculture, the Department of Mines and the Environmental Protection Authority. The rehabilitation plan will also address soil conservation issues and the control of noxious weeds.
- 4. Prior to commencement of any siteworks, the proponent shall prepare an environmental management and monitoring programme to the satisfaction of the Minister for the Environment. The programme shall be implemented and reports provided to the satisfaction of the Environmental Protection Authority on advice from the Department of Mines.
- 5. In the event of noise levels and tonal components which result in unacceptable noise amenity at the Urala Station homestead as determined by the Environmental Protection Authority, the proponent shall resolve the problem to the satisfaction of the Authority.
- 6. The proponent shall be responsible for decommissioning and removal of the plant and installations and rehabilitating the site and its environs to the satisfaction of the Environmental Protection Authority. At least six months prior to cessation of operations, the proponent shall prepare and subsequently implement a decommissioning and rehabilitation plan to the satisfaction of the Environmental Protection Authority upon advice from the Department of Mines and the Department of Agriculture.

Published on

- **B**; OCT 1990

- 7. No transfer of ownership, control or management of the project which would give rise to a need for the replacement of the proponent shall take place until the Minister for the Environment has advised the proponent that approval has been given for the nomination of a replacement proponent. Any request for the exercise of that power of the Minister shall be accompanied by a copy of this statement endorsed with an undertaking by the proposed replacement proponent to carry out the project in accordance with the conditions and procedures set out in the statement.
- 8. If the proponent has not substantially commenced the project within five years of the date of this statement then the approval to implement the proposal as granted in this statement shall lapse and be void. The Minister for the Environment shall determine any question as to whether the project has been substantially commenced. Any application to extend the period of five years referred to in this condition shall be made before the expiration of that period, to the Minister for the Environment by way of a request for a change in the condition under Section 46 of the Environmental Protection Act. (On expiration of the five year period, further consideration of the proposal can only occur following a new referral to the Environmental Protection Authority).

Bob Pearce, MLA MINISTER FOR THE ENVIRONMENT

- 8 OCT 1990

The following is a summary of the commitments made by the Joint Venturers to be undertaken during the project design, construction and operation:

- 1. The pipeline, flowlines and processing plant site will not be constructed through significant archaeological and environmentally sensitive sites. A minimum buffer of 200 m will be provided at these sites.
- 2. Pets and firearms will be banned from site during construction and operation.
- 3. Fire fighting facilities will be available during construction and operation on access roads and tracks within the plant boundary.
- 4. Construction and operation will be monitored by the Operator to ensure compliance with environmental obligations.
- 5. All personnel employed on the project will be trained in the environmental management methods made in this statement.
- 6. Penalties for breaking environmental regulations will be included in contracts.
- 7. Any Aboriginal relics discovered during the work will be treated in accordance with the Aboriginal Heritage Act.
- 8. Camps will not be sited within 500 m of water holes.
- 9. Approval of the pastoralists and advice from environmental consultants will be sought for obtaining water from surface water sources.
- 10. Hydrotest water will contain a biodegradable inhibitor and will be disposed of in dry, sandy depressions, so that it will not enter the surface drainage system.
- 11. Domestic wastes will be deposited at the Onslow tip.
- 12. Industrial wastes will be deposited in a manner consistent with Ashburton Shire policy.
- 13. Sewage will be treated in septic tanks.
- 14. Treated and brackish water will be discharged to an impervious evaporation pond.
- 15. Power will be generated using production gas, other than in emergencies when diesel will be used.
- 16. Noise attenuation will be provided to limit noise levels under normal operating conditions to 70dB(A) at 100 m from the plant boundary.
- 17. Topsoil will be reserved and re-spread over backfilled excavations.
- 18. Backfilled excavations will be graded to ensure natural drainage is maintained.
- 19. Excavations and damaged land will be restored to acceptable ground conditions.
- 20. Cleared vegetation will be re-spread over the pipeline easement.
- 21. Imported materials for construction activity will be removed from the site and disposed of according for Ashburton Shire policy after construction is complete.
- 22. Regular inspections of the pipeline easement will be carried out and also after periods of heavy rain to monitor environmental conditions and to effect repairs where necessary.
- 23. Abandonment of the gas gathering system will include purging and sealing of pipelines, and removal of equipment at the processing plant followed by ground restoration.



Appendix B Ministerial Statement MS 1209



Hon Reece Whitby MLA Minister for Environment; Climate Action; Racing and Gaming

Statement No. 1209

STATEMENT TO CHANGE THE IMPLEMENTATION CONDITIONS APPLYING TO A PROPOSAL

(Section 46 of the Environmental Protection Act 1986)

TUBRIDGI GAS FIELD DEVELOPMENT, NEAR ONSLOW

Proposal: Development and operation of the Tubridgi Gas Field

Proponent: AGI Development Group Nominees Pty Limited (AGID)

Australian Company Number 153 397 632

Proponent Address: Level 22, 140 St Georges Terrace, Perth, WA 6000

Report of the Environmental Protection Authority: 1743

Preceding Statement Relating to this Proposal: 112

Introduction: Pursuant to section 45(8) as applied by the *Environmental Protection Act 1986*, as applied by section 46(8), amendments to the implementation conditions have been agreed, and the proposal must now be implemented in accordance with the following implementation conditions and procedures.

Commitment 1 of conditions 1 is deleted and replaced with:

9 Aboriginal Cultural Heritage

- 9-1 The proponent must implement the proposal to meet the following environmental outcomes:
 - (1) no direct **disturbance** of the **Aboriginal cultural heritage** exclusion zones; and
 - (2) subject to reasonable health and safety requirements, no interruption of ongoing access to land utilised for traditional use or custom by the Thalanyji People.

Published on:

- 9-2 The proponent must implement the proposal to meet the following environmental objectives:
 - (1) avoid, where practicable, and otherwise minimise direct **disturbance** to **Aboriginal cultural heritage** sites;
 - (2) avoid, where possible, and otherwise minimise indirect impacts to **Aboriginal cultural heritage** within and surrounding the development envelope; and
 - (3) ongoing consultation and engagement with Traditional Owners about achievement of the outcomes and objectives in conditions 9-1 and 9-2 for the life of the proposal.
- 9-3 Prior to constructing or re-aligning the pipelines and flowlines, the proponent must, in consultation with the Thalanyji People prepare a Cultural Heritage Management Plan that demonstrates how the environmental outcomes for Aboriginal cultural heritage will be substantiated, how Aboriginal cultural heritage objectives will be achieved and satisfies the requirements of conditions 9-1 and 9-2 and submit to the CEO.
- 9-4 The Cultural Heritage Management Plan required by condition 9-3 must include:
 - a framework for consultation with the Thalanyji People during the life of the proposal;
 - (2) a procedure that staff and contracting personnel are made aware of their obligations under the *Aboriginal Heritage Act* 1972 or subsequent *Aboriginal Cultural Heritage Act* 2021;
 - risk-based management actions that will be implemented to demonstrate compliance with the outcomes and objectives specified in conditions 9-1 and 9-2;
 - (4) measurable **management target(s)** to determine the effectiveness of the risk-based **management actions**;
 - (5) monitoring to measure the effectiveness of management actions against management targets;
 - (6) mitigation actions to be implemented in the event that monitoring demonstrates that management targets will not be met;
 - (7) involvement of Thalanyji People in heritage monitoring;
 - (8) a process for review and revision of the Cultural Heritage Management Plan in consultation with the Thalanyji People; and

- (9) reporting on compliance with the objectives in condition 9-1 to the Thalanyji People and the **CEO** including timing and format of report(s).
- 9-5 The proponent:
 - (1) must implement the most recent version of the Cultural Heritage Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated the outcomes and objectives in conditions 9-1 and 9-2 have been met or are able to be met under another statutory decision-making process; and
 - (2) shall review and revise the Cultural Heritage Management Plan in consultation with the Thalanyji People and submit it to the CEO as and when directed by the CEO.

Commitment 1 of conditions 1 is deleted and replaced with:

10 Environmentally Sensitive Sites Outcome

- 10-1 The proponent shall ensure the following outcomes are achieved when constructing or re-aligning, and or undertaking operations, decommissioning and closure of pipelines, and flowlines:
 - (1) avoid or minimise **disturbance** to threatened and priority ecological communities, and threatened and priority species; and
 - (2) avoid or minimise impact on biologically valuable areas such as heathlands, wetlands, creek crossing and sand dunes.
- 10-2 The pipeline will only have a single crossing of the Ashburton River at its southeastern end. The river crossing will be open excavated only during April to October.

11 Compliance Reporting

- 11-1 The proponent must provide an annual Compliance Assessment Report to the **CEO** for the purpose of determining whether the implementation conditions are being complied with.
- 11-2 Unless a different date or frequency is approved by the CEO, the first annual Compliance Assessment Report must be submitted within fifteen (15) months of the date of this Statement, and subsequent plans must be submitted annually from that date.
- 11-3 Each annual Compliance Assessment Report must be endorsed by the proponent's Chief Executive Officer, or a person approved by proponent's Chief Executive Officer to be delegated to sign on the Chief Executive Officer's behalf.

11-4 Each annual Compliance Assessment Report must:

- (1) state whether each condition of this Statement has been complied with, including:
 - (a) exceedance of any proposal limits and extents;
 - (b) achievement of environmental outcomes;
 - (c) achievement of environmental objectives;
 - (d) requirements to implement the content of environmental management plans;
 - (e) monitoring requirements;
 - (f) implement contingency measures;
 - (g) requirements to implement adaptive management; and
 - (h) reporting requirements.
- (2) provide evidence to substantiate statements of compliance, or details of where there has been a non-compliance;
- (3) include the corrective, remedial and preventative actions taken in response to any potential non-compliance;
- (4) be provided in a form suitable for publication on the proponent's website and online by the Department of Water and Environmental Regulation; and
- (5) be prepared and published consistent with the latest version of the Compliance Assessment Plan required by condition 11-5 which the CEO has confirmed by notice in writing satisfies the relevant requirements of Management Plans and Compliance Reporting.
- 11-5 The proponent must prepare a Compliance Assessment Plan which is submitted to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition 11-2, or prior to implementation of the proposal, whichever is sooner.
- 11-6 The Compliance Assessment Plan must include:
 - (1) what, when and how information will be collected and recorded to assess compliance;
 - (2) the methods which will be used to assess compliance;

- (3) the methods which will be used to validate the adequacy of the compliance assessment to determine whether the implementation conditions are being complied with;
- (4) the retention of compliance assessments;
- (5) the table of contents of Compliance Assessment Reports, including audit tables; and
- (6) how and when Compliance Assessment Reports will be made publicly available, including usually being published on the proponent's website within sixty (60) days of being provided to the CEO.

Hon Reece Whitby MLA MINISTER FOR ENVIRONMENT; CLIMATE ACTION

15 AUG 2023

Affected decision-making authorities consulted under section 46(8A): Minister for Lands Minister for Aboriginal Affairs Minister for Mines and Petroleum

Acronym or Abbreviation	Definition or Term
Aboriginal cultural heritage	Means the tangible and intangible elements that are important to the Aboriginal people of the State, and are recognised through social, spiritual, historical, scientific, or aesthetic values, as part of Aboriginal tradition to the extent they directly affect or are affected by physical or biological surroundings.
Another statutory decision-making process	Under the Aboriginal Heritage Act 1972 or subsequent Aboriginal Cultural Heritage Act 2021.
CEO	The Chief Executive Officer of the Department of the Public Service which is responsible for the administration of section 48 of the <i>Environmental Protection Act 1986</i> , or the CEO's delegate.
Confirmed	In relation to a plan required to be made and submitted to the CEO, means, by notice in writing, meets the requirements of the relevant condition. In relation to a plan required to be implemented without the need to be first submitted to the CEO, means that plan until it is revised, and then means, at the relevant time, the plan that the CEO confirmed, by notice in writing, meets the requirements of the relevant condition.
	Flora – result in death, destruction, removal, severing or doing substantial damage to
Disturbance	Fauna – has the effect of altering the natural behaviour of fauna to its detriment
	Direct – causes or immediately has the disturbance effect Indirect – materially contributes to the disturbance effect
Management action(s)	The identified actions implemented with the intent of achieving the environmental objective
Management target(s)	A type of indicator to evaluate whether an environmental objective is being achieved.

Table 1: Abbreviations and definitions to be added to Ministerial Statement 112



Appendix C Statement of Compliance

Statement of Compliance

1. Proposal and Proponent Details

Proposal Title	Tubridgi Gas Field Development Near Onslow
Statement Number	112
Proponent Name	AGI Development Group Nominees Pty Limited (AGID).
Proponent's Australian Company Number (where relevant)	153 396 911

2. Statement of Compliance Details

Reporting Period	15/08/23 to 14/08/24

Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))									
Pre-construction		Construction	Х	Operation	х	Decommissioning			

Audit Table for Statement addressed in this Statement of	C
Compliance is provided at Attachment:	Z

An audit table for the Statement addressed in this Statement of Compliance must be provided as Attachment 2 to this Statement of Compliance. The audit table must be prepared and maintained in accordance with the Department of Water and Environmental Regulation (DWER) *Post Assessment Guideline for Preparing an Audit Table*, as amended from time to time. The 'Status Column' of the audit table must accurately describe the compliance status of each implementation condition and/or procedure for the reporting period of this Statement of Compliance. The terms that may be used by the proponent in the 'Status Column' of the audit table are limited to the Compliance Status Terms listed and defined in Table 1 of Attachment 1.

Were all implementation conditions and/or procedures of the Statement complied with within the reporting period? (please tick \checkmark the appropriate box)							
No (please proceed to Section 3)	~	Yes (please proceed to Section 4)					

3. Details of Non-compliance(s) and/or Potential Non-compliance(s)

The information required Section 3 must be provided for each non-compliance or potential non-compliance identified during the reporting period covered by this Statement of Compliance.

Non-compliance/potential non-compliance 3-1

Which implementation condition or procedure was non-compliant or potentially non-compliant? MS1209:M11-5

The proponent must prepare a Compliance Assessment Plan which is submitted to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition D2-2, or prior to implementation of the proposal, whichever is sooner.

Was the implementation condition or procedure non-compliant or potentially non-compliant? Potentially non-compliant

On what date(s) did the non-compliance or potential non-compliance occur (if applicable)? N/A

Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?

Yes

□ Reported to DWER verbally □ Reported to DWER in writing

Date _____ Date _____

🔽 No

What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance? The potential non-compliance relates to the initial version of the compliance assessment plan (07/05/2024) being submitted after the implementation of the proposal (December 2023).

What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates) Not applicable

What was the cause(s) of the non-compliance or potential non-compliance? Organisational resource allocation

What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance? Compliance Assessment Plan submitted 07/05/2024.

What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?

Compliance assessed for Compliance Assessment Report under approved Compliance Assessment Plan following reporting period (15/08/2023 to 14/08/2024).

Please provide information/documentation collected and recorded in relation to this implementation condition or procedure:

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance. INITIALS:

- in the reporting period addressed in this Statement of Compliance; and
- as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance.

(the above information may be provided as an attachment to this Statement of Compliance)

For additional non-compliance or potential non-compliance, please duplicate this page as required.

4. Proponent Declaration

I, Tawake Rakai (EGM Transmissions Asset Management) declare that I am authorised on behalf of AGI Development Group Nominees Pty Limited (AGID) to submit this form and that the information contained in this form is true and not misleading.

1 Hahan

Date: 10 December 2024

Please note that:

Signature:..

• it is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give or cause to be given information that to his knowledge is false or misleading in a material particular; and

.....

• the Chief Executive Officer of the DWER has powers under section 47(2) of the *Environmental Protection Act 1986* to require reports and information about implementation of the proposal to which the statement relates and compliance with the implementation conditions.

5. Submission of Statement of Compliance

One hard copy and one electronic copy (preferably PDF on CD or thumb drive) of the Statement of Compliance are required to be submitted to the Chief Executive Officer, DWER, marked to the attention of Manager, Compliance (Ministerial Statements).

Please note, the DWER has adopted a procedure of providing written acknowledgment of receipt of all Statements of Compliance submitted by the proponent, however, the DWER does not approve Statements of Compliance.

6. Contact Information

Queries regarding Statements of Compliance, or other issues of compliance relevant to a Statement may be directed to Compliance (Ministerial Statements), DWER:

Manager, Compliance (Ministerial Statements)

Department of Water and Environmental Regulation

Postal Address: Locked Bag 10 Joondalup DC WA 6919

Phone: (08) 6364 7000

Email: <u>compliance@dwer.wa.gov.au</u>

7. Post Assessment Guidelines and Forms

Post assessment documents can be found at www.epa.wa.gov.au

ATTACHMENT 1

Table 1 Compliance Status Terms

Compliance Status Terms	Abbrev	Definition	Notes
Compliant	С	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	 This term applies to audit elements with: ongoing requirements that have been met during the reporting period; and requirements with a finite period of application that have been met during the reporting period, but whose status has not yet been classified as 'completed'.
Completed	CLD	A requirement with a finite period of application has been satisfactorily completed.	 This term may only be used where: audit elements have a finite period of application (e.g. construction activities, development of a document); the action has been satisfactorily completed; and the DWER has provided written acceptance of 'completed' status for the audit element.
Not required at this stage	NR	The requirements of the audit element were not triggered during the reporting period.	This should be consistent with the 'Phase' column of the audit table.
Potentially Non-compliant	PNC	Possible or likely failure to meet the requirements of the audit element.	This term may apply where during the reporting period the proponent has identified a potential non-compliance and has not yet finalized its investigations to determine whether non-compliance has occurred.
Non-compliant	NC	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.	This term applies where the requirements of the audit element are not "complete" have not been met during the reporting period.
In Process	IP	Where an audit element requires a management or monitoring plan be submitted to the DWER or another government agency for approval, that submission has been made and no further information or changes have been requested by the DWER or the other government agency and assessment by the DWER or other government agency for approval is still pending.	The term 'In Process' may not be used for any purpose other than that stated in the Definition Column. The term 'In Process' may not be used to describe the compliance status of an implementation condition and/or procedure that requires implementation throughout the life of the project (e.g. implementation of a management plan).

Appendix D Assessment of Compliance MS112 & MS 1209

Table D.1: Ministerial Statement 112 and 1209 Audit Table

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS112:M1	Implementation	In implementing the proposal, the proponent shall fulfil the commitments (which are not inconsistent with the conditions or procedures contained in this statement) made in the Consultative Environmental Review and in responses to issues raised during the assessment. (A copy of the	The proponent shall fulfill the commitments in Table E.2.	R01_MS112_MS1209 CAR 2024 Appendix E	Overall	Ongoing	Compliant	Appendix B assesses project compliance in the reporting year against the commitments of the consultative review and found that:
		consolidated list of commitments is attached)						 20 commitments were assessed to be compliant;
								Three commitments were assessed to be not applicable
								Four commitments were assessed to be not determined
								Zero commitments were assessed to be potentially non- compliant
MS112:M2.1	Implementation	Subject to these conditions, the manner of detailed implementation of the proposal shall conform in substance with that set out in any designs, specifications, plans or other technical material submitted by the proponent to the Environmental Protection Authority with the proposal.	The proposal will be implemented to comply with MS112 and MS1209 and the TGS Well Activities and Operations Environment Plan (TGS EP) obligations.	R01_MS112_MS1209 CAR 2024 Appendix C R05_E-PLN-023 TGSP Operations EP Rev3 R16_TGS DWER CEMP_Rev 1	Overall	Ongoing	Compliant	 The proponent continued to implement the proposal to conform in substance with the designs, specifications. plans and technical material submitted by the proponent to the EPA with the proposal. There were 7 wells in operation and 3 flowlines under construction in the reporting period. This ACR (R01) contains an assessment of the implementation of the Objectives, Standards and Measurement Criteria in the TGS management and monitoring programmes (R05 and R16). Refer to MS112:M4.2 and Appendix G and Appendix H.
MS112:M2.2	Implementation	Where, in the course of that detailed implementation, the proponent seeks to change those designs, specifications, plans or other technical material in a way that the Minister for the Environment determines on the advice of the Environmental Protection Authority and the Department of Mines, is not substantial, those changes may be effected.	Changes to the proposal can be made on advice from the Minister. Evidence: DWER correspondence on proposed changes to proposal	CO4_EXTERNAL_ RE_ AGI Tubridgi s45C application (MS112)	Overall	Ongoing	Compliant	 AGID submitted a 45C application (CO4) to amend the Tubridgi Gas Field Development during the reporting period to: 1. Request a change to proposal under section 45C and a change to conditions under section 46 of the EP Act to confirm the authorised extent of the approved proposal and contemporise the implementation conditions. 2. Apply for a licence under Part V of the EP Act for the operation of the upgraded TGS Facility noting that most of the new and upgraded infrastructure has been installed.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	St
MS112:M3	Rehabilitation	Prior to commencement of any siteworks, the proponent shall prepare a rehabilitation plan. The plan shall be prepared and implemented to the satisfaction of the Minister for the Environment on advice from the Department of Agriculture, the Department of Mines; and the Environmental Protection Authority. The rehabilitation plan will also address soil conservation issues and the control of noxious weeds.	The proponent shall prepare a rehabilitation plan which includes measures to address soil conservation issues and the control of noxious weeds.	R03_DBP2302_Tubridgi_Reh abilitation Report 2023 R06_TGSP Flowlines EP_Rev 7 M02_MS112_MS1209 CAR Evidence Request Response Rev 2 R15_Flowline Rehabilitation Plan Addendum R01_MS112_MS1209 CAR 2024 Appendix F C07_EXTERNAL_ MS112_MS1209 CAR Evidence Request R17_E-STU-078 Tubridgi Rehabilitation Report and Appendices 2024 R14_E-PLN-023 TGSP Operations EP Rev5	Pre-construction	Prior to commencement of any siteworks	Cu



Status	Further Information
Compliant	Further InformationMS112The rehabilitation plan was accepted byEPA 08/12/2016. The plan addressedsoil conservation issues and the controlof noxious weeds. The plan wasimplemented on the initial TubridgiPipeline works and are currently beingmonitored. The latest monitoringassessment was undertaken in August2024 and the monitoring report is
	pending. The December 2023 Rehabilitation Assessment Report (R03) recommended that further monitoring is continued to be undertaken for sites within CP3 communities that have not met completion criteria. All monitored sites have met the completion criteria associated with weeds. Rehabiltation monitoring was undertaken in 2024 (R17).
	MS1209 16.4 ha of clearing is permitted under MS1209 with 9 ha to be rehabilitated. The Construction EP (R06) contains no specific rehabilitation requirements required in a rehabilitation plan. AGID report (M02) that DWER have deferred rehabilitation to be regulated by DEMIRS under the TGS EP Addendum (R15). No evidence was provided of the Ministers satisfaction with the deferred regulation or the document. However, AGIG reported that the condition was currently part of a 45C application (C07) to remove the condition 3 as the commitment is part of the unapproved TGS EP (R14).
	The Tubridgi Gas Storage Project Operational Environment Plan Addendum (Tubridgi Gas Storage Project – Flowlines (E-PLN-043)) has been implemented and the assessment (Appendix F) found:
	 Three commitments were assessed as compliant Two commitments were assessed
	 as not applicable Zero commitments were assessed as potentially not conformant

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS112:M4.1	Implementation	Prior to commencement of any site works, the proponent shall prepare an environmental management and monitoring programme to the satisfaction of the Minister for the Environment.	The proponent shall prepare environmental management and monitoring programme.	M02_MS112_MS1209 CAR Evidence Request Response Rev 2 R05_E-PLN-023 TGSP Operations EP Rev3 R06_TGSP Flowlines EP_Rev 7 C07_EXTERNAL_ MS112_MS1209 CAR Evidence Request C08_MS112 Condition Environment Plan submission – Tubridgi R16_TGS DWER CEMP_Rev 1	Pre-construction	Prior to commencement of any siteworks	Compliant	MS112The original environmental management and monitoring programme was accepted by the Minister for Environment 08/12/2016.MS1209AGID report (M02) that DWER have deferred environmental management and monitoring of the TGS Operations to be regulated by DEMIRS under the TGS EP (R05). The Flowline CEMP (R16) was provided to the Minister (C08) 21/11/2022. No feedback was provided by the Minister on the CEMP prior to the implementation of the MS1209 activities. The DEMIRS Flowline EP was submitted 3 May 2023.
MS112:M4.2	Implementation	The environmental management and monitoring programme shall be implemented and reports provided to the satisfaction of the Environmental Protection Authority on advice from the Department of Mines.	The proponent will implement the TGS EPs.	R01_MS112_MS1209 CAR 2024 Appendix G R01_MS112_MS1209 CAR 2024 Appendix H R05_E-PLN-023 TGSP Operations EP Rev3 R06_TGSP Flowlines EP_Rev 7	Overall	Ongoing	Compliant	 The TGS Operations EP has been implemented and the results of the assessment of the 57 performance measurement criteria (Appendix G) is as follows: 34 commitments were assessed as compliant 22 commitments were assessed as not applicable One commitment was assessed as potentially non-compliant The Flowlines CEMP has been implemented and the results of the assessment of the 46 audit criteria (Appendix H) is as follows: 33 commitments were assessed as not applicable Two commitments were assessed as not applicable 11 commitments were assessed as potentially non-compliant This CAR is being submitted to DWER to report on the implementation of the environmental management and monitoring programme.
MS112:M5	Implementation	In the event of noise levels and tonal components which result in unacceptable noise amenity at the Urala Station homestead as determined by the Environmental Protection Authority, the proponent shall resolve the problem to the satisfaction of the Authority.	The proponent shall monitor noise levels and report and resolve any issues to the satisfaction of the EPA Evidence: Noise Survey Report is included in Annual CAR	R07_Rpt00-AU01967-NIA- AGIG TGS Noise Study E08_TGS Communication Log July 2023 to 17 Oct 2024	Overall	Ongoing	Compliant	No events have been raised of noise complaints at Uralla Station (E08). A Noise survey was conducted in October 2023 with three recommendations made. Noise levels at Uralla Station meet the requirements of the environmental noise regulations (<35 dB(A)).
MS112:M6	Decommissionin g	The proponent shall be responsible for decommissioning and removal of the plant and installations and rehabilitating the site and its environs to the satisfaction of the Environmental Protection Authority. At least six months prior to cessation of operations, the proponent shall prepare and subsequently implement a decommissioning and rehabilitation plan to the satisfaction of the Environmental Protection Authority upon advice from the Department of Mines and the Department of Agriculture.	The proponent will submit a decommissioning and rehabilitation plan which includes advice from the Department of Mines and the Department of Agriculture. Evidence: Written advice from Department of Mines, Written advice from Department of Agriculture, Approval documentation from the EPA	M01_MS112_MS1209 CAR Evidence Request Response Rev 1	Decommissioning	Six months prior to cessation of operations	NRATS	No decommissioning has been planned or undertaken in the reporting year.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS112:M7	Proponent	No transfer of ownership, control or management of the project which would give rise to a need for replacement of the proponent shall take place until the Minister for the Environment has advised the proponent that approval has been given for the nomination of a replacement proponent. Any request for the exercise of that power of the Minster shall be accompanied by a copy of this statement endorsed with an undertaking by the proposed replacement proponent to carry out the project in accordance with the conditions and procedures set out in the statement.	An application to the Minister is required as per condition MS112:M7 for a change in proponent. Evidence: Approval documentation from the Minister	M01_MS112_MS1209 CAR Evidence Request Response Rev 1	Overall	Ongoing	NRATS	There has been no change to the proponent or proponent address in the reporting period.
MS112:M8	Proponent	If the proponent has not substantially commenced the project within five years of the date of this statement then the approval to implement the proposal as granted in this statement shall lapse and be void. The Minister for the Environment shall determine any question as to whether the project has been substantially commenced. Any application to extend the period of five years referred to in this condition shall be made before the expiration of that period, to the Minister for the Environment by way of a request for a change in the condition under Section 46 of the Environmental Protection Act (on expiration of the five year period, further consideration of the proposal can only occur following a new referral to the Environmental Protection Authority).	The project must commence before 08/10/1995 or an application to extend is required.	Notification of commencement of project	Pre-construction	Before 08/10/1995	Compliant (Complete)	Action commenced prior to 08/10/1995
MS1209:M9- 1(1)	Aboriginal Cultural Heritage	 The proponent must implement the proposal to meet the following environmental outcomes: (1) no direct disturbance of the Aboriginal cultural heritage exclusion zones; 	Have no direct disturbance of the Aboriginal cultural heritage exclusion zones. Evidence: Cultural Heritage Survey, Aboriginal Monitoring, Incident Register	M01_MS112_MS1209 CAR Evidence Request Response Rev 1	Overall	Ongoing	Compliant	There was no disturbance of Aboriginal cultural heritage exclusion zones in the reporting period (M01).
MS1209:M9- 1(2)	Aboriginal Cultural Heritage	 The proponent must implement the proposal to meet the following environmental outcomes: (2) subject to reasonable health and safety requirements, no interruption of ongoing access to land utilised for traditional use or custom by the Thalanyji People; 	Have no interruption of ongoing access to land utilised for traditional use or custom by the Thalanyji People. Evidence: Audit of Cultural Heritage Management Plan	R08_C02_E-COR-0299 CHMP TGS Project EPA Comments Updated August 2024 Draft for BTAC consideration	Overall	Ongoing	NRATS	The CHMP has not been approved as at the 14/09/2024.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe
MS1209:M9- 2(1)	Aboriginal Cultural Heritage	The proponent must implement the proposal to meet the following environmental objectives: (1) avoid, where practicable, and otherwise minimise direct disturbance to Aboriginal cultural heritage sites;	Avoid direct disturbance to Aboriginal cultural heritage sites. Evidence: Cultural Heritage Survey, Aboriginal Monitoring, Incident Register	R04_EPA Report 1743 - Tubridgi Gas Field - s.46 inquiry E02_Cleared Areas E03_ACV0167_TGS Expansion Flowlines E04_ACV 0161_TGS Well Pad Clearing_v2 R08_C02_E-COR-0299 CHMP TGS Project EPA Comments Updated August 2024 Draft for BTAC consideration E05_TGS Expansion Wells and Flowlines Construction System Audit E16_BTAC Consultation for Nov 2023 - Nov 2024 M01_MS112_MS1209 CAR Evidence Request Response Rev 1	Overall	Ongoing
MS1209:M9- 2(2)	Aboriginal Cultural Heritage	 The proponent must implement the proposal to meet the following environmental objectives: (2) avoid, where possible, and otherwise minimise indirect impacts to Aboriginal cultural heritage within and surrounding the development envelope; 	Avoid indirect impacts to Aboriginal cultural heritage within and surrounding the development envelope. Evidence: Cultural Heritage Survey, Aboriginal Monitoring, Incident Register	E03_ACV0167_TGS Expansion Flowlines E04_ACV 0161_TGS Well Pad Clearing_v2 M01_MS112_MS1209 CAR Evidence Request Response Rev 1	Overall	Ongoing
MS1209:M9- 2(3)	Aboriginal Cultural Heritage	 The proponent must implement the proposal to meet the following environmental objectives: (3) ongoing consultation and engagement with Traditional Owners about achievement of the outcomes and objectives in conditions 9-1 and 9-2 for the life of the proposal. 	Conduct ongoing consultation and engagement with Traditional Owners. Evidence: Consultation Register	E16_BTAC Consultation for Nov 2023 - Nov 2024	Overall	Ongoing
MS1209:M9-3	Aboriginal Cultural Heritage	Prior to constructing or re-aligning the pipelines and flowlines, the proponent must, in consultation with the Thalanyji People prepare a Cultural Heritage Management Plan that demonstrates how the environmental outcomes for Aboriginal cultural heritage will be substantiated, how Aboriginal cultural heritage objectives will be achieved and satisfies the requirements of conditions 9-1 and 9-2 and submit to the CEO.	Prepare a Cultural Heritage Management Plan in consultation with the Thalanyji People prior to constructing or re-aligning the pipelines and flowlines. Evidence: Correspondence of submission of CHMP to DWER	C03_E-COR-0300 APP025468 Statement1209 EPA to AGIG Letter Att1 - CHMP Update table C01_E-COR-0298 Letter to DWER Ministerial statement 1209 amendments to CHMP	Pre-construction	Pre-construction



Status	Further Information
Compliant	A total of 8.343 ha (E02) of the maximum 16.4 ha (R04) was cleared under the MS1209 limit in the reporting period for flowline and anode clearing (E03) and an additional 6.24 ha cleared for wells (E04) under EP Act exemption. Surveys were undertaken as reported in
	 the CHMP (R08): Report on an Aboriginal Archaeological and Ethnographic Survey of Four Tubridgi Gas Wells, Three Access Roads and Two Flowlines for AGIG's Gas Storage Project at Urala Station, Pilbara, WA (December 2022) Report of an Archaeological and Ethnographic Survey for AGIG's
	 Phase 3 Tubridgi Gas Storage Expansion Project (December 2022) Report on an Aboriginal Archaeological Survey of the Tubridgi Gas Wells for AGIG's Gas Storage Project at Urala Station, Pilbara, WA (August 2021) Expansion Wells and Flowlines Construction System Audit (E05) commits to cultural heritage monitors being in place for top-soil disturbance activities, consultation register (E16) records email on monitors 20/11/2023.
	No aboriginal cultural heritage sites were identified (M01).
Compliant	ACVs (E03, E04) state that works in the heritage areas shall be avoided and mechanical transit shall remain on existing track only. The ACVs report that no clearing was undertaken outside of the approved clearing boundaries. No aboriginal cultural heritage sites were identified (M01).
Compliant	Consultation register (E16) records ongoing consultation with Traditional Owners.
Compliant	The CHMP (version 0) endorsed by BTAC (Thalanyji People) was submitted to DWER 20/11/2023 and AGID received DWER review comments on 30/07/2024 (C03). AGID modified the CHMP and resubmitted version 1 on 04/09/2024 (C01).

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS1209:M9-4	Aboriginal Cultural Heritage	 The Cultural Heritage Management Plan required by condition 9-3 must include: (1) a framework for consultation with the Thalanyji People during the life of the proposal; (2) a procedure that staff and contracting personnel are made aware of their obligations under the Aboriginal Heritage Act 1972 or subsequent Aboriginal Cultural Heritage Act 2021; (3) risk-based management actions that will be implemented to demonstrate compliance with the outcomes and objectives specified in conditions 9-1 and 9-2; (4) measurable management target(s) to determine the effectiveness of the risk-based management actions; (5) monitoring to measure the effectiveness of management actions against management targets; (6) mitigation actions to be implemented in the event that monitoring demonstrates that management targets will not be met; (7) involvement of Thalanyji People in heritage monitoring; (8) a process for review and revision of the Cultural Heritage Management Plan in consultation with the Thalanyji People; and (9) reporting on compliance with the objectives in condition 9-1 to the Thalanyji People and the CEO including timing and format of report(s). 	Incorporate the criteria in MS1209:M9-4 when preparing the Cultural Heritage Management Plan. Evidence: Approved CHMP document	C03_E-COR-0300 APP025468 Statement1209 EPA to AGIG Letter Att1 - CHMP Update table C01_E-COR-0298 Letter to DWER Ministerial statement 1209 amendments to CHMP	Pre-construction	Pre-construction	NRATS	AGID modified the CHMP to meet the requirements of M9-4 based on DWER feedback (C03) and resubmitted version 1 on 04/09/2024 (C01). The CHMP was not approved in the reporting period.
MS1209:M9- 5(1)	Aboriginal Cultural Heritage	The proponent must implement the most recent version of the Cultural Heritage Management Plan until the CEO has confirmed by notice in writing that the proponent has demonstrated the outcomes and objectives in conditions 9-1 and 9-2 have been met or are able to be met under another statutory decision-making process.	Implement the Cultural Heritage Management Plan. Evidence: Audit of Cultural Heritage Management Plan	C02_MS112_MS1209 CAR Evidence Request	Overall	Ongoing	NRATS	The CHMP was not approved in the reporting period (C02).
MS1209:M9- 5(2)	Aboriginal Cultural Heritage	The proponent shall review and revise the Cultural Heritage Management Plan in consultation with the Thalanyji People and submit it to the CEO as and when directed by the CEO.	Review and revise the Cultural Heritage Management Plan in consultation with the Thalanyji People then submit to the CEO. Evidence: Submission of CHMP to DWER correspondence	C03_E-COR-0300 APP025468 Statement1209 EPA to AGIG Letter Att1 - CHMP Update table C01_E-COR-0298 Letter to DWER Ministerial statement 1209 amendments to CHMP	Overall	As and when directed by the CEO.	Compliant	The CHMP was being updated as per the DWER review (C03) in the reporting period.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS1209:M10- 1(1)	Environmentally Sensitive Sites Outcome	 The proponent shall ensure the following outcomes are achieved when constructing or re-aligning, and or undertaking operations, decommissioning and closure of pipelines, and flowlines: (1) avoid or minimise disturbance to threatened and priority ecological communities, and threatened and priority species; 	Avoid disturbance to threatened and priority ecological communities, and threatened and priority species. Evidence: DEMIRS Environment Plan, Vegetation Survey, Annual Environmental Report reporting on annual disturbance footprint	R06_TGSP Flowlines EP_Rev 7 E03_ACV0167_TGS Expansion Flowlines	Overall	Ongoing	Compliant	 The Pipeline and Flowlines EP (R06) states that no threatened or priority ecological communities were recorded or inferred to occur within the TGSP area. It identifies: no threatened species likely to occur one priority species (P3) identified as occurring one priority species (P3) likely to occur one priority species (P3) possible to occur one priority species (P3) possible to occur AGID implemented the following to avoid and minimise disturbance to priority species: Delineation of approved area prior to clear and grade (pegging). Internal clearing authorisation process Reduction in the right of way corridor Inductions Rehabilitating areas not required
M51209:M10- 1(2)	Environmentally Sensitive Sites Outcome	 The proponent shall ensure the following outcomes are achieved when constructing or re-aligning, and or undertaking operations, decommissioning and closure of pipelines, and flowlines: (2) avoid or minimise impact on biologically valuable areas such as heathlands, wetlands, creek crossing and sand dunes. 	Avoid heathlands, wetlands, creek crossing and sand dunes. Evidence: DEMIRS Environment Plan, Vegetation Survey, Annual Environmental Report reporting on annual disturbance footprint	R06_TGSP Flowlines EP_Rev 7 E03_ACV0167_TGS Expansion Flowlines	Overall	Ongoing	Compliant	for future operational use The TGSP addresses the risk of erosion and sedimentation with the ACV stipulating that wetlands shall not be interfered with while water is in the system and clearing of riparian vegetation avoided. Note: The EP states that vegetation units within the proximity of the proposed works include coastal dunes with no specific management or mitigation controls in place for these biologically valuable areas.
MS1209:M10-2	Environmentally Sensitive Sites Outcome	The pipeline will only have a single crossing of the Ashburton River at its south- eastern end. The river crossing will be open excavated only during April to October.	Excavate a single crossing only by open excavation in the period between April and October. Evidence: Design drawings, Daily reports, Site inspection / aerial surveillance	M01_MS112_MS1209 CAR Evidence Request Response Rev 1	Construction	Construction	NRATS	There was no construction work on the Ashburton River crossing in the reporting period.
MS1209:M11-1	Compliance reporting	The proponent must provide an annual Compliance Assessment Report to the CEO for the purpose of determining whether the implementation conditions are being complied with.	Provide an annual CAR outlining compliance with the conditions	R01_MS112_MS1209 CAR 2024	Overall	15 November (Annually)	Compliant	This ACR (R01) is the first CAR for Ministerial Statement MS1209.
MS1209:M11-2	Compliance reporting	Unless a different date or frequency is approved by the CEO, the first annual Compliance Assessment Report must be submitted within fifteen (15) months of the date of this Statement, and subsequent reports must be submitted annually from that date.	Provide the first CAR within 15 months of the date of this CAP unless specified otherwise by the CEO	R01_MS112_MS1209 CAR 2024	Overall	15 November (Annually)	Compliant	This ACR (R01) is the first CAR for Ministerial Statement MS1209.
MS1209:M11-3	Compliance reporting	Each annual Compliance Assessment Report must be endorsed by the proponent's Chief Executive Officer, or a person approved by proponent's Chief Executive Officer to be delegated to sign on the Chief Executive Officer's behalf.	Either the proponent's CEO or other approved person to endorse each annual CAR	R01_MS112_MS1209 CAR 2024	Overall	15 November (Annually)	Compliant	This ACR (R01) is the first CAR for Ministerial Statement MS1209.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS1209:M11-4	Compliance reporting	 Each annual Compliance Assessment Report must: state whether each condition of this Statement has been complied with, including: a. exceedance of any proposal limits and extents; b. achievement of environmental outcomes; c. achievement of environmental objectives; d. requirements to implement the content of environmental management plans; e. monitoring requirements; f. implementation of contingency measures; g. requirements to implement adaptive management; h. reporting requirements; 2. provide evidence to substantiate statements of compliance, or details of where there has been a noncompliance; 3. include the corrective, remedial and preventative actions taken in response to any potential noncompliance; 4. be provided in a form suitable for publication on the proponent's website and online by the Department of Water and Environmental Regulation; and 5. be prepared and published consistent with the latest version of the Compliance Assessment Plan required by condition D2-5 which the CEO has confirmed by notice in writing satisfies the relevant requirements of Part C and Part D. 	Annual CAR must complete the objectives set out in the condition including being published within 60 days of submission to the DWER CEO. Evidence: Submission email to CEO with Annual CAR attached	R01_MS112_MS1209 CAR 2024 R13_67055 R01 MS1209 Tubridgi CAP Rev 1	Overall	15 November (Annually)	Compliant	 This CAR (R01) contains the following requirements: 1. state whether each condition of this Statement has been complied with (Appendix D) 2. provide evidence to substantiate statements of compliance, or details of where there has been a non-compliance (Section 5) 3. include the corrective, remedial and preventative actions taken in response to any potential non-compliance (Section 7) 4. be provided in a form suitable for publication on the proponent's website and online by the Department of Water and Environmental Regulation (this document submission is in pdf format) 5. be prepared and published consistent with the latest version of the Compliance Assessment Plan (R13)
MS1209:M11-5	Compliance reporting	The proponent must prepare a Compliance Assessment Plan which is submitted to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition D2-2, or prior to implementation of the proposal, whichever is sooner.	Provide a CAP within the timeframe required Evidence: Submission of CAP to DWER	E03_ACV0167_TGS Expansion Flowlines R13_67055 R01 MS1209 Tubridgi CAP Rev 1	Prior to construction	6 months before first CAR or before implementation, whichever is sooner	Potentially non-compliant	Clearing for the flowlines under MS1209 (E03) was undertaken in December 2023. The initial version of the CAP (R13) was not submitted until 07 May 2024.



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
MS1209:M11-6	Compliance reporting	 The Compliance Assessment Plan must include: 6. what, when and how information will be collected and recorded to assess compliance; 	Provide a CAP which contains the relevant information required by the condition	R13_67055 R01 MS1209 Tubridgi CAP Rev 1	Prior to construction	6 months before first CAR or before implementation, whichever is	Compliant	The CAP (R13) contains the information required by the condition:1. what, when and how information will be collected and recorded to
	 7. the methods which will be used to assess compliance; 8. the methods which will be used to validate the adequacy of the compliance assessment to determine whether the implementation conditions are being complied with; 9. the retention of compliance assessments; 		sooner		 assess compliance (Table A.1) the methods which will be used to assess compliance (Table A.1) the methods which will be used to validate the adequacy of the 			
		 the table of contents of Compliance Assessment Reports, including audit tables; and how and when Compliance Assessment Reports will be made publicly available, including usually being published on the proponent's website within sixty (60) days of being provided to the CEO. 						 compliance assessment to determine whether the implementation conditions are being complied with (Table A.1) 4. the retention of compliance assessments (Section 3.3) 5. the table of contents of Compliance Assessment Reports, including audit tables (Section 3.1.1)
								 how and when Compliance Assessment Reports will be made publicly available, including usually being published on the proponent's website within sixty (60) days of being provided to the CEO (Section 3.4)



Appendix E MS112 Consultative Environmental Review Commitment Compliance Assessment

Audit Code	Subject	Requirement	How	Verification Metod	Evidence	Phase	Timeframe	Status	Further Information
MS112:P02.1	Tubridgi Facilities	Pets and firearms will be banned from site during construction and operation.	No pets and firearms on site during construction	Induction Incident Register	E06_TGS-Z-MAN-006-01_2 Operations Induction E17_Event Reports 05-11- 2024	Construction	Construction	Compliant	Construction workers are required to undertake the construction induction and the operations induction (E06). Slide 44 of the operations induction outlines prohibited items on site including firearms and pets. There were no reported incidents of pets or firearms on site in the reporting period (E17).
MS112:P02.2	Tubridgi Facilities	Pets and firearms will be banned from site during construction and operation.	No pets and firearms on site during operation	Induction Incident Register	E06_TGS-Z-MAN-006-01_2 Operations Induction E17_Event Reports 05-11- 2024	Operations	Ongoing	Compliant	Slide 44 of the operations induction (E06) outlines prohibited items on site including firearms and pets. There were no reported incidents of pets or firearms on site in the reporting period (E17).
MS112:P03.1	Tubridgi Facilities	Fire fighting facilities will be available during construction and operation on access roads and tracks with the plant boundary	Fire fighting facilities will be available during construction on access roads and tracks within the plant boundary	HSE Site Inspection Workorder for Extinguisher Maintenance	E07_20240326 TGS Flowlines Project - HSE Field Audit (INX- 19577) E05_TGS Expansion Wells and Flowlines Construction System Audit	Construction	Construction	Compliant	Field audits undertaken during construction during the reporting period identified appropriate fire fighting equipment (extinguishers) in place.
MS112:P03.2	Tubridgi Facilities	Fire fighting facilities will be available during construction and operation on access roads and tracks with the plant boundary	Fire fighting facilities will be available during operations on access roads and tracks within the plant boundary	HSE Site Inspection Workorder for Extinguisher Maintenance	E09_Fire Equipment Service 1001560197_TGS_5951881	Operations	Ongoing	Compliant	Fire fighting facilities for operations were checked and serviced in March (E09) in accordance with PM300414.
MS112:P04.1	Tubridgi Facilities	Construction and operation will be monitored by the Operator to ensure compliance with environmental obligations.	Construction will be monitored by the Operator to ensure compliance with environmental obligations.	HSE Site Inspection Construction Environmental Audit	R01_MS112_MS1209 CAR 2024 R06_TGSP Flowlines EP_Rev 7 E05_TGS Expansion Wells and Flowlines Construction System Audit	Construction	Construction	Compliant	TGS Expansion Wells and Flowlines Construction System Audit (E05) provides an audit of a selected number of environmental obligations in the objectives, standards and measurement criteria of the construction EP (R06). This CAR (R01) audits all environmental obligations under the Flowline EP, MS112 and MS1209.
MS112:P04.2	Tubridgi Facilities	Construction and operation will be monitored by the Operator to ensure compliance with environmental obligations.	Operations will be monitored by the Operator to ensure compliance with environmental obligations.	Operator Site Inspection HSE Site Inspection Environmental Audit	R01_MS112_MS1209 CAR 2024 E10_Weekly HSE Inspection - Alltype Slug Catcher 19-05-24 E11_Weekly HSE Inspection - Alltype Slug Catcher 26-05-24 R05_E-PLN-023 TGSP Operations EP Rev3	Operations	Ongoing	Compliant	The proponent provided site walk around checklists (E10, E11) for operations (signage, bunds, spill kits). This CAR (R01) audits environmental obligations for operations under the TGS EP or MS112, MS1209.

Table E.2: MS112 Consultative Environmental Review Commitments Audit Table



Audit Code	Subject	Requirement	How	Verification Metod	Evidence	Phase	Timeframe	5
MS112:P05	Implementation	All personnel employed on the Project will be trained in the environmental management methods made in this statement.	All personnel will be aware of their obligations under MS112 and MS1209	Induction Presentation Induction Register	E06_TGS-Z-MAN-006-01_2 Operations Induction E12_TGS Flowline Site Specific Induction	Overall	Ongoing	C
MS112:P06	Tubridgi Facilities	Penalties for breaking environmental regulations will be included in contracts.	Contracts are to be written so that contractors comply with legislation and legal liability applies to breaches of environmental regulation. This requirement is to be communicated during induction.	Induction Presentation Induction Register	E06_TGS-Z-MAN-006-01_2 Operations Induction	Overall	Ongoing	C
MS112:P07	Tubridgi Facilities	Any Aboriginal relics discovered during the work will be treated in accordance with the Aboriginal Heritage Act.	Aboriginal cultural heritage artefacts will be treated in accordance with the Aboriginal Heritage Act.	Assessment of conformance with the Cultural Heritage Management Plan.	M01_MS112_MS1209 CAR Evidence Request Response Rev 1	Overall	Ongoing	N a
MS112:P08	Tubridgi Facilities	Camps will not be sited within 500 m of water holes	Camps will not be sited within 500 m of water holes.	HSE Site Inspection	R02_MS112_MS1209 CAR 2023	Overall	Ongoing	C
MS112:P09	Tubridgi Facilities	Approval of the pastoralists and advice from environmental consultants will be sought for obtaining water from surface water sources.	The proponent will obtain water resource advice and pastoral and regulatory approval prior to the extraction of surface water.	Stakeholder correspondence records Consultant advice report	E13_SWL166334(6) M01_MS112_MS1209 CAR Evidence Request Response Rev 1	Overall	Ongoing	C
MS112:P10	Tubridgi Facilities	Hydrotest water will contain a biodegradable inhibitor and will be disposed of in dry, sandy depressions, so that it will not enter the surface drainage system.	Hydrotest water will contain a biodegradable inhibitor and will be disposed of in dry, sandy depressions, so that it will not enter the surface drainage system.	Daily Report	M01_MS112_MS1209 CAR Evidence Request Response Rev 1	Construction	Construction	C
MS112:P11	Tubridgi Facilities	Domestic wastes will be deposited at the Onslow tip.	Domestic waste will be disposed in accordance with the requirements of the Shire of Ashburton	Waste register Waste receipts/records	E14_Remondis TGS FY2024 Report M02_MS112_MS1209 CAR Evidence Request Response Rev 2	Overall	Ongoing	(



Status	Further Information
Compliant	The HSE induction (E06) is completed by all personnel working at ASW or on TGS and covers: Incident Reporting Environmental Hazards Heritage Fauna Weed Management Chemicals and Spills Waste Fire Land and Soil Management Emergency Response Construction personnel also undertake the flowline induction (E12).
Compliant	Contracts are written so that contractors must comply with legislation. Legal liability applies to any contractors who breach environmental regulation. The TGS induction (E06) outlines the regulatory framework that workers (including contractors and subcontractors) are required to adhere to (applicability specified on both slide 4 and 5).
Not applicable	No cultural heritage artefacts were discovered during work undertaken in the reporting period.
Compliant	 The 2023 CAR reports that: The TGS accommodation camp is not located within 500m of any natural water holes. The temporary drill camp is stored and situated >500m from any water hole.
Compliant	Surface water was being accessed under SWL166334 (E10) up to 11/12/2023 for dust suppression associated with the TGS expansion project. No additional approvals were required within the reporting period. There was no additional surface water accessed in the reporting period.
Compliant	Water used for hydrotesting flowlines was disposed of into an evaporation pond in the reporting period (did not enter surface drainage system).
Compliant	The Remondis waste register (E14) lists the volume of domestic waste taken from Tubridgi. Waste is taken to Seven Mile Waste Facility in Karratha (M02) rather than Onslow however the Karratha facility is a Class III landfill as well as accepting oily waste, tyres, comingled recycling and scrap metal. TGS have not reported any Class IV waste requiring disposal at Onslow.

Audit Code	Subject	Requirement	How	Verification Metod	Evidence	Phase	Timeframe	
MS112:P12	Implementation	Industrial wastes will be deposited in a manner consistent with Ashburton Shire policy.	Industrial waste will be disposed in accordance with the requirements of the Shire of Ashburton	Waste register Waste receipts/records	E14_Remondis TGS FY2024 Report	Overall	Ongoing	
MS112:P13	Tubridgi Facilities	Sewage will be treated in septic tanks.	Sewage will be treated in septic tanks.	Ashburton Shire approval to construct /operate an apparatus for the treatment of sewage	R02_MS112_MS1209 CAR 2023 R09_2023 Q3 TGS Quarterly Emissions R10_2023 Q4 TGS Quarterly Emissions R11_2024 Q1 TGS Quarterly Emissions R12_2024 Q2 TGS Quarterly	Overall	Ongoing	(
MS112:P14	Tubridgi Facilities	Treated and brackish water will be discharged to an impervious evaporation pond.	Treated and brackish water will be discharged to an impervious evaporation pond.	Liner integrity results Monitoring Bore Data Emissions and Discharges Report	Emissions E15_TGS-C-020- 01_B4_24.02.2022 - Evap Pond Plan and Design	Overall	Ongoing	(
MS112:P15	Tubridgi Facilities	Power will be generated using production gas, other than in emergencies when diesel will be used.	Power will be generated using production gas, other than in emergencies when diesel will be used.	NGERS Reporting Diesel Usage	E18_NGER E-REP-179 FY24 TGS S19 SUBMITTED REPORT	Overall	Ongoing	
MS112:P16	Tubridgi Facilities	Noise attenuation will be provided to limit noise levels under normal operating conditions to 70 dB(A) at 100 m from the plant boundary.	The noise level will be attenuated to 70 dB(A) at 100 m from the plant boundary.	Annual noise survey	R07_Rpt00-AU01967-NIA- AGIG TGS Noise Study R18_TGS Noise Survey Report Rev 1	Overall	Ongoing	C
MS112:P17	Tubridgi Facilities	Topsoil will be reserved and re-spread over backfilled excavations.	Topsoil will be reserved and re-spread over backfilled excavations.	HSE Site Inspection Aerial Survey	C06_E-AUD-119 TGS Flowlines EP Draft Audit	Construction	Construction	I C
MS112:P18	Tubridgi Facilities	Backfilled excavations will be graded to ensure natural drainage is maintained.	Backfilled excavations will be graded to ensure natural drainage is maintained.	HSE Site Inspection Aerial Survey	Refer to MS112:P17	Construction	Construction	1



Status	Further Information
Compliant	 Waste is segregated into (E14): Batteries (recycled) Cardboard (recycled) Chemicals Comingled (recycled) Dry-recyclable (recycled) Dry waste (Landfill) Hydrocarbons (recycled) Oily water (recycled) Putresicble (Landfill) Steel (recycled) Waste is removed by a licenced waste contractor.
Compliant	The 2023 CAR reports that the TGS Accommodation utilises a biomax septic and treatment tank system onsite and sub- surface irrigation. The emissions and discharges reported for 2023-24 (R09, R10, R11, R12) reported 116 kL irrigated and 0 kL untreated sludge taken to licenced waste facility.
Compliant	Condensate is disposed into a 50m x 50m 2mm HDPE UV and hydrocarbon resistant lined evaporation pond (E15). Installation involved QA/QC of the compacted surfaces and liner.
Compliant	The 2023/24 emissions and discharges for the facility shows that the generator usage is follows: Diesel: 1,341 t CO2-e / annum or the equivalent of 22.48 kL diesel Gas: 6,233 t CO2-e / annum This indicates that the diesel is used for backup generator to the gas generator. TGS Wellhead facilities use solar panels and battery backups for power.
Compliant	The noise modelling undertaken in October 2023 found that the requirement for noise to be 70dB(A) at 100 m from the plant boundary was exceeded at two locations (77 dB(A) and 76 dB(A). The compressor has not been installed and these are modelled results. The nearest noise sensitive premises is >100m from the plant boundary and AGIG are investigating modifying this condition if validated results exceed the threshold in the current condition. The previous noise survey (measured) (R18) found that noise levels 100m from the plant boundary did not exceed the required level.
Not determined	No monthly aerial surveillance of flowlines was available for this audit.
Not determined	Refer to MS112:P17

Audit Code	Subject	Requirement	How	Verification Metod	Evidence	Phase	Timeframe	Status	Further Information
MS112:P19	Implementation	Excavations and damaged land will be restored to acceptable ground conditions.	Excavations and damaged land will be restored to acceptable ground conditions.	HSE Site Inspection Aerial surveillance records Rehabilitation reports	Refer to MS112:P17	Construction	Construction	Not determined	Refer to MS112:P17
MS112:P20	Implementation	Cleared vegetation will be re-spread over the pipeline easement.	Cleared vegetation will be re-spread over the pipeline easement.	Environmental Audit Rehabilitation reports	C06_E-AUD-119 TGS Flowlines EP Draft Audit	Construction	Construction	Not determined	No monthly aerial surveillance of flowlines was available for this audit.
MS112:P21	Rehabilitation	Imported materials for construction activity will be removed from the site and disposed of according to Shire of Ashburton policy after construction is completed	Imported materials for construction activity will be removed from the site and disposed of according to Shire of Ashburton requirements after construction is completed.	Waste register Waste receipts/records	M01_MS112_MS1209 CAR Evidence Request Response Rev 1 E14_Remondis TGS FY2024 Report	Construction	Construction	Compliant	Construction activities were completed in May 2024 with all material removed from site at that time in accordance with Shire of Ashburton policy.
MS112:P22a	Pipeline easement	Regular inspections of the pipeline easement will be carried out and also after periods of heavy rain to monitor environmental conditions.	Regular inspections of the pipeline easement will be carried out to monitor environmental conditions.	Aerial surveillance records	E19_AGID Tubridgi Gas Storage Aerial Surveillance Report June 2024 E20_AGID Ashburton West Pipeline Aerial Surveillance Report June 2024	Overall	Ongoing	Compliant	Aerial surveillance is undertaken for TGS and flowlines (E19) and the ASW pipeline (E202) on a monthly basis with reports used to identify environmental issues
MS112:P22b	Pipeline easement	Regular inspections of the pipeline easement will be carried out and also after periods of heavy rain to monitor environmental conditions.	Inspections of the pipeline easement will be carried out after periods of heavy rain to monitor environmental conditions.	Aerial surveillance records	M01_MS112_MS1209 CAR Evidence Request Response Rev 1	Overall	After periods of heavy rain	Compliant	Aerial surveillance was carried out monthly. No additional surveillance was undertaken after periods of heavy rain.
MS112:P22c	Pipeline easement	Repair the pipeline easement as required.	Repair the pipeline easement as required.	Aerial surveillance records	M01_MS112_MS1209 CAR Evidence Request Response Rev 1	Overall	As required	Not applicable	No repairs of the pipeline easement were required or undertaken in the reporting period.
MS112:P23	Decommissionin g	Abandonment of the gas gathering system will include purging and sealing of pipelines, and removal of equipment at the processing plant followed by ground restoration.	Abandonment of the gas gathering system will include purging and sealing of pipelines, and removal of equipment at the processing plant followed by ground restoration. Abandonment requirements	DMIRS EP Photo evidence Plugged and abandonment report DMIRS correspondence	M01_MS112_MS1209 CAR Evidence Request Response Rev 1	Decommissioning	Decommissioning	Not applicable	Abandonment of gas gathering system is not applicable at this stage.



Appendix F Rehabilitation Plan Compliance Assessment

Table F.3: Rehabilitation Plan Audit Table

Commitment	Requirement	Measurement Criteria	Evidence	Assessment	Status
01	All contractors will be advised of the requirements and obligations under the EP and this addendum through the induction provided on arrival at the facility.	All personnel are inducted on the requirements and obligations under this EP relevant to their role.	E12_TGS Flowline Site Specific Induction	 Induction undertaken by all personnel outlines: There is no access outside of approved areas; Clearing shall be specific to the requirements of the clearing approval; No parking on vegetation; Stay on designated cleared tracks; No turn around tracks to be created unless approved; Minimise driving at night, dusk and dawn; Twice daily (sunrise and sunset) fauna inspections are to be completed of all open excavations; Trenches and bell holes left open overnight shall have egress ramps every 500 metres and shelters every 100 metres; Machinery and vehicles shall be weed and seed free with certificates in place; Conservation Flora species (next page) shall be protected where possible; and Be aware of dangerous fauna (snakes etc.) Conduct rehabilitation progressively as soon as possible; Stockpile topsoil and vegetation separately (<2m high); Install erosion controls to prevent sediment loss offsite. Apply dust and noise controls to minimise offsite impacts (i.e. water cart) and no night works planned; Gas only introduced post leak testing and precommissioning tasks; Flaring volumes are minimised and captured (estimation of volume); No driving over soil stockpiles and reduced speed on right of way. Smoking only in designated areas; Daily check on fire ratings and fire bans; Fire training for selected personnel (i.e. fire watch); Required fire fighting water available onsite (DFES required) and test equipment daily (e.g. Water Truck, Trailer); Fire fighting equipment on all plant and vehicles. 	Complian



Commitment	Requirement	Measurement Criteria	Evidence	Assessment	Status
RP 02	 To meet the rehabilitation criteria to minimise impacts from the TGSP flowlines construction, immediately after disturbance (within 6 months post-construction), areas are appropriately reinstated, with the following measures implemented as a minimum: removal of all waste; and restriction of vehicle and personnel access (limited to the flowline disturbance footprint, camp site and access tracks). 	ACV Records (Site Closure Inspection and Pre- and Post- construction Photos) confirm that the site has been appropriately reinstated soon after disturbance (within 6 months post-construction) with measures implemented as per the relevant EPS.	E03_ACV0167_TGS Expansion Flowlines C06_E-AUD-119 TGS Flowlines EP Draft Audit C09_EXTERNAL_ MS112_MS1209 Aerial Surveillance	ACV record confirms that clearing has been undertaken however it does not confirm that that the site has been appropriately reinstated soon after disturbance (within 6 months post-construction). Construction Manager (Brenan McClure) confirms no unnecessary delay in backfilling/reinstating flowline disturbance footprint. There is aerial surveillance monitoring to confirm reinstatement within 6 months.	Compliant
RP 03	Ongoing consultation with relevant stakeholders (particularly pastoral lease holders) will be undertaken with regards to rehabilitation activities under this addendum.	GIS Records (via X-Info Connect) confirm that ongoing consultation with relevant stakeholder have been undertaken in relation.	R06_TGSP Flowlines EP_Rev 7	Flowlines EP (R06) documents consultation with landholder on post construction land use.	Compliant
RP 04	The flowline (post-construction) rehabilitation areas will meet the vegetation completion criteria (Section 6.1). Further monitoring and/or additional management measures will be implemented as per the recommendations in the relevant rehabilitation monitoring report (including targeted weed management).	 Rehabilitation Assessment / Monitoring Reports confirm that the rehabilitation areas have met the vegetation completion criteria as per Table 6-2. Rehabilitation progress and outcomes are included in the Annual Environmental Report. 	Not applicable	Completion criteria monitoring undertaken in Spring 2024. Report pending.	Not applicable
RP 05	Rehabilitation Monitoring: Ongoing site evaluation of (vegetation) rehabilitation program until the completion criteria are met or on advice from an environmental specialist (botanist / ecologist); annually for a minimum of three years and until the rehabilitated areas have regenerated to a stable condition.	Rehabilitation Assessment / Monitoring Reports confirm that the rehabilitation areas have met the vegetation completion criteria as per Table 6-2.	Not applicable	Completion criteria monitoring undertaken in Spring 2024. Report pending.	Not applicable



Appendix G Tubridgi Gas Storage Project Environment Plan Compliance Assessment

Table G.4: TGS Environment Plan Audit Table

Commitment	Requirement	Measurement Criteria	Evidence	Assessment
TGSOEP 01	 To minimise change to soil profile from excavation activities ensure that any works impacting the topsoil or soil profile shall abide by the Native Vegetation Clearance Procedure (E- PRO-002) which shall ensure at a minimum the: rehabilitation and reinstatement of non-operational areas; topsoil and subsoil are stockpiled separately; stockpiles are <2m high; reinstatement of soil profile following excavation; ripping of compacted subsoil before reinstating topsoil; and Authorisation to Clear Vegetation (ACV) or an equivalent process is implemented. 	No non-compliances identified against requirements of the Native Vegetation Clearance Procedure A HSE System Audit against the requirements of the Native Vegetation Clearance Procedure (E-PRO-002). Audit Report. Once every three years	C05_E-AUD-120 TGS OEP Draft Audit Findings	No works impacti undertaken assoc reporting period.
TGSOEP 02	 To minimise change to soil profile from excavation activities ensure that any works impacting the topsoil or soil profile shall abide by the Native Vegetation Clearance Procedure (E- PRO-002) which shall ensure at a minimum the: rehabilitation and reinstatement of non-operational areas; topsoil and subsoil are stockpiled separately; stockpiles are <2m high; reinstatement of soil profile following excavation; ripping of compacted subsoil before reinstating topsoil; and Authorisation to Clear Vegetation (ACV) or an equivalent process is implemented. 	Aerial Surveillance monitors for erosion events on a monthly basis	E19_AGID Tubridgi Gas Storage Aerial Surveillance Report June 2024 E20_AGID Ashburton West Pipeline Aerial Surveillance Report June 2024	Aerial surveillance basis during the re were identified.
TGSOEP 03	If erosion is identified associated with AGIT activities, erosion repairs shall be undertaken and if warranted, erosion and sediment control structures shall be constructed.	All corrective actions for erosion inconsistent with surrounding areas are closed out within the due date. Event Report Review. Incident or event information reviewed in relation to erosion or soil quality. Trend Analysis is conducted to ensure ongoing identification of trends. INX – Event Reports Trend Analysis. Opportunistic Annual – Trend Analysis	E19_AGID Tubridgi Gas Storage Aerial Surveillance Report June 2024 E20_AGID Ashburton West Pipeline Aerial Surveillance Report June 2024	No erosion identif surveillance and r
TGSOEP 04	 To prevent the occurrence of soil erosion and sediment transport into watercourses through effective controls, the Procedure for Management of Erosion Risk Areas (E-PRO-003) shall be implemented and include: the identification and implementation of erosion and sediment controls as required; restricting vehicle (including aircraft) movements to minimise disturbance; the management of erosion from water discharge; and regular inspections of erosion controls. 	 Aerial Surveillance monitors the stability and effectiveness of erosion controls at waterway crossings on a monthly basis. Opportunistic observation for evidence of areas impacted by erosion. 	E20_AGID Ashburton West Pipeline Aerial Surveillance Report June 2024	Erosion repairs we KP 82.92 and mon undertaken (E20).



:	Status
npacting topsoil or soil profile were associated with TGS operations in the eriod.	Not applicable
illance was undertaken on a monthly ; the reporting period. No erosion events fied.	Compliant
identified during monthly aerial and regular field checks by personnel.	Not applicable
airs were implemented at WAWP ROW d monthly inspection of affected area (E20).	Compliant

Commitment	Requirement	Measurement Criteria	Evidence	Assessment	Status
TGSOEP 05	To prevent acidification of potential ASS soils conduct ASS investigations where required and implement any subsequent ASS Management Plan.	No non-compliances identified against ASSMP requirements. HSE System Audit. A HSE System Audit against the requirements of the Acid Sulphate Soil Management Plan (ASSMP). Once during implementation NOTE: ASSMP audits can only be conducted on projects where implemented.	C05_E-AUD-120 TGS OEP Draft Audit Findings	No works impacting soil profile were undertaken associated with TGS operations in the reporting period.	Not applicable
TGSOEP 06	 Minimise and manage the disturbance to remnant native vegetation by ensuring that all clearing is managed through an internal authorisation process which facilitates pre clearing checks by a competent person to: minimise clearing where possible; review the proposed location and method of clearing and conduct impact assessment; obtain any approvals required to ensure compliance to all relevant laws; and establish any conditions necessary in order to minimise impact (including at a minimum the segregation and stockpiling of soil to enable reinstatement). 	All vegetation clearing conducted in compliance with internal authorisation process. Vegetation Clearing Review. Review of all vegetation clearing to record location; date of clearing; total hectares; photos of reinstatement (where required) and Supervisor's declaration of compliance against the ACV. Annual	C05_E-AUD-120 TGS OEP Draft Audit Findings	No works clearing native vegetation were undertaken associated with TGS operations in the reporting period.	Not applicable
TGSOEP 07	 Minimise and manage the disturbance to remnant native vegetation by ensuring that all clearing is managed through an internal authorisation process which facilitates pre clearing checks by a competent person to: minimise clearing where possible; review the proposed location and method of clearing and conduct impact assessment; obtain any approvals required to ensure compliance to all relevant laws; and establish any conditions necessary in order to minimise impact (including at a minimum the segregation and stockpiling of soil to enable reinstatement). 	No clearing conducted outside the internal authorisation process.	C05_E-AUD-120 TGS OEP Draft Audit Findings	No works clearing native vegetation were undertaken associated with TGS operations in the reporting period.	Not applicable
TGSOEP 08	 Minimise and manage the disturbance to remnant native vegetation by ensuring that all clearing is managed through an internal authorisation process which facilitates pre clearing checks by a competent person to: minimise clearing where possible; review the proposed location and method of clearing and conduct impact assessment; obtain any approvals required to ensure compliance to all relevant laws; and establish any conditions necessary in order to minimise impact (including at a minimum the segregation and stockpiling of soil to enable reinstatement). 	Any actions arising from non-compliances identified against requirements of the Native Vegetation Clearance Procedure are closed out within the due dates HSE System Audit A HSE System Audit against the requirements of the Native Vegetation Clearance Procedure (E-PRO-002). Once every three years (may be linked to DBP Audits where clearing not being completed on TGSP)	C05_E-AUD-120 TGS OEP Draft Audit Findings	No works clearing native vegetation were undertaken associated with TGS operations in the reporting period.	Not applicable
TGSOEP 09	Minimise and manage the disturbance to remnant native vegetation by ensuring that areas of vegetation disturbance not required for future operational use shall be rehabilitated.	Non-operational areas are not impacted and rehabilitation is occurring Aerial Surveillance. Opportunistic observation for evidence of areas requiring clearing or recently cleared. Opportunistic reviews of rehabilitation locations through project work to ensure rehabilitation is occurring. Monthly	R03_DBP2302_Tubridgi_Rehabilitation Report 2023	Rehabilitation monitoring of is being undertaken on the TGS2 well site and along two flowlines originating from the TGS Facility. Survey was undertaken September 2023 with recommendations for follow up monitoring until all sites within the vegetation community have achieved completion criteria. Rehabilitation monitoring was undertaken in Spring 2024 with the report currently pending.	Compliant
TGSOEP 10	Minimise and manage the disturbance to remnant native vegetation by ensuring that areas of vegetation disturbance not required for future operational use shall be rehabilitated.	Any actions arising from Project Environmental Inspections in relation to rehabilitation requirements are closed out within the due dates. Project Environmental Inspections. Inspections against a pre- determined checklist to review environmental management of key risk areas including rehabilitation implementation. Weekly during construction activities	M01_MS112_MS1209 CAR Evidence Request Response Rev 1	The monitoring recommended in 2023 was undertaken in 2024.	Compliant



Commitment	Requirement	Measurement Criteria	Evidence	Assessment	Status
TGSOEP 11	Avoid disturbance within conservation significant and environmentally sensitive areas to the maximum extent practicable by maintaining a GIS Environmental Database to present up to date publically available information regarding the location of conservation significant and environmentally sensitive areas.	GIS database is up to date and contains all relevant DBNGP environmental information. Review of GIS Database Register. Reviews GIS data for relevancy and ensure data is up to date.2 yearly	C05_E-AUD-120 TGS OEP Draft Audit Findings	GIS Environmental Database is up to date with publicly available information and AGIG specific environmental information.	Compliant
TGSOEP 12	 Minimise the potential for new weeds to be introduced into the operational area from external sources or spreading existing weeds by implementing the Clean on Entry procedure which ensures: the delineation and demarcation of locations of high sensitivity to weeds or pathogens (i.e. COE areas); the preferential scheduling of work in COE areas for drier periods; clean on entry signage is installed for internal and external (third party) interest; and the clean down of vehicles prior to entering COE areas (as per GIS database). 	All vegetation clearing conducted in compliance with internal authorisation process. Vegetation Clearing Review - Review of all vegetation clearing to record location; date of clearing; total hectares; photos of reinstatement (where required) and Supervisor's declaration of compliance against the ACV.	C05_E-AUD-120 TGS OEP Draft Audit Findings	No works clearing native vegetation were undertaken associated with TGS operations in the reporting period.	Not applicable
TGSOEP 13	 Minimise the potential for new weeds to be introduced into the operational area from external sources or spreading existing weeds by undertaking a targeted weed management program to promote control of new or existing populations, this includes: the timely management of weed locations; the documentation of weed management activities; landholder liaison on weed management activities; the identification and management of Weeds of National Significance (WONS); ensuring no overspray or product being sprayed offsite; managing previous weed spray organic material build up; and keeping records of new or previously unreported weed areas. 	All corrective actions for weed management arising from audits are closed out within the due date. HSE System Audit All corrective actions for weed management are closed out within the due date. Event Report Review - Event information reviewed in relation to weed events raised. Trend Analysis is conducted to ensure ongoing identification of trends. Aerial Surveillance monitors the presence of weeds in facilities on a monthly basis. Aerial Surveillance - Opportunistic observation for evidence of areas requiring weed management and disturbance to areas of rehabilitation. No landholder complaints in relation to poor weed management techniques. Landholder Management System (LMS) Records of landholder interactions including complaints	C05_E-AUD-120 TGS OEP Draft Audit Finding E08_TGS Communication Log July 2023 to 17 Oct 2024	Routine weed management undertaken as scheduled. No corrective actions for weed management were raised from audit within the reporting period. An opportunity for improvement for weed management was raised during the reporting period. There were no landholder complaints in relation to poor weed management techniques in the reporting period.	Compliant
TGSOEP 14	 Minimise or eliminate any impact to native vegetation / crops caused by targeted weed management. by ensuring all weed and seed requirements are implemented including: fill is certified weed and seed free; and vehicles and plant are inspected frequently and cleaned down when required. 	Project Environmental Inspections verify 100% compliance with weed and seed and rehabilitation requirements. Inspections against a pre- determined checklist to review environmental management of key risk areas including weed and seed requirements.	C05_E-AUD-120 TGS OEP Draft Audit Findings	There were no projects undertaken associated with TGS operations in the reporting period.	Not applicable
TGSOEP 15	 Minimise or eliminate any impact to native vegetation / crops caused by targeted weed management. by ensuring the following associated with the civils program: all fill is certified weed and seed free prior to use; local borrow pits are preferred; and third party access is discouraged. 	 100% compliance that any fill used in civil operations is certified weed and seed free. (Note that the local Urala Station borrow pit is classed as local fill and does not need certification) HSE System Audits - HSE System audit reviews implementation of weed management work orders (within Maximo), includes a visual inspection for the presence of weed and evidence of weed management. Audit reviews activities including fill to ensure certification (weed and seed free) is in place. 	R02_MS112_MS1209 CAR 2023	Fill is sourced from the local Urala Station borrow pit which is deemed compliant with the requirement for certification.	Compliant
TGSOEP 16	Minimise or eliminate any impact to native vegetation / crops caused by targeted weed management. by rehabilitation of non- operational areas is completed.	Aerial Surveillance opportunistically monitors rehabilitation of disturbed areas and third party access.	R03_DBP2302_Tubridgi_Rehabilitation Report 2023 E19_AGID Tubridgi Gas Storage Aerial Surveillance Report June 2024 E20_AGID Ashburton West Pipeline Aerial Surveillance Report June 2024	Rehabilitation monitoring continues to be undertaken by air and on ground.	Compliant



Commitment	Requirement	Measurement Criteria	Evidence	Assessment	Status
TGSOEP 17	 To prevent bushfires as a results of construction and operational activities and ensure no pipeline operation caused bushfires all activities are conducted in accordance with relevant fire restrictions (local, state), notifications and Hot Works Procedure. This includes ensuring that: all plant and equipment comply to fire safety standards; high gas risk areas are demarcated and signed; facility fire breaks and smoking areas are in place and maintained appropriate firefighting equipment is available at all times; specific personnel are trained in responding to fires; inductions include fire risks (hot works and smoking); and all non-approved items are kept away from hazardous areas 	All corrective actions in relation to fire prevention are closed out within the due date. HSE Field Audits confirm use of certificates under the Permit to Work system including hot works certificate application – 100% compliant at all times. HSE Field Audit Checklist. Monthly. A checklist review conducted by the HSE team onsite to ensure procedural and EP controls are in place including firefighting equipment, hot work certificate application and training	C05_E-AUD-120 TGS OEP Draft Audit Findings E25_DBP-S-FRM-054.1 Rev8 HSE Field Audit SMP	No corrective actions in relation to fire prevention were raised within the reporting period.	Not applicable
TGSOEP 18	 To prevent bushfires as a results of construction and operational activities and ensure no pipeline operation caused bushfires all activities are conducted in accordance with relevant fire restrictions (local, state), notifications and Hot Works Procedure. This includes ensuring that: all plant and equipment comply to fire safety standards; high gas risk areas are demarcated and signed; facility fire breaks and smoking areas are in place and maintained appropriate firefighting equipment is available at all times; specific personnel are trained in responding to fires; inductions include fire risks (hot works and smoking); and all non-approved items are kept away from hazardous areas 	Monthly review of facility fire breaks as part of Aerial Surveillance. Opportunistic observation for evidence of facility fire breaks.	E19_AGID Tubridgi Gas Storage Aerial Surveillance Report June 2024 E20_AGID Ashburton West Pipeline Aerial Surveillance Report June 2024	Aerial surveillance is conducted monthly and includes check of firebreaks.	Compliant
TGSOEP 19	 To prevent bushfires as a results of construction and operational activities and ensure no pipeline operation caused bushfires all activities are conducted in accordance with relevant fire restrictions (local, state), notifications and Hot Works Procedure. This includes ensuring that: all plant and equipment comply to fire safety standards; high gas risk areas are demarcated and signed; facility fire breaks and smoking areas are in place and maintained appropriate firefighting equipment is available at all times; specific personnel are trained in responding to fires; inductions include fire risks (hot works and smoking); and all non-approved items are kept away from hazardous areas 	Project Environmental Inspection Checklist - Weekly during construction activities. Inspections against a pre-determined checklist to review environmental management of key risk areas including firefighting equipment.	C05_E-AUD-120 TGS OEP Draft Audit Findings	There were no construction activities under the Tubridgi Operations EP in the reporting period.	Not applicable



Commitment	Requirement	Measurement Criteria	Evidence	Assessment
TGSOEP 20	 To minimise the direct impacts on fauna through impacts with vehicles, aircraft, entrapment in excavation works, or extraordinary exposure to predators, all personnel shall abide by the requirements of the Fauna Interaction Procedure (E-PRO-004) including: planned interactions in consultation with trained and licensed personnel; travel on existing access tracks only; minimise travel at dusk and dawn; recording of all fauna interactions including location data and date; and capturing all fauna interactions (injury, relocation or fatality) as an event. 	No non-compliances to the Fauna Licence - Fauna Licence Review is a review to document all details of fauna interactions including personnel involved, the date, location, species and release details. Annual	E17_Event Reports 05-11-2024 E06_TGS-Z-MAN-006-01_2 Operations Induction E12_TGS Flowline Site Specific Induction	Induction outlines d minimising driving a Event register (E17) with vehicles, aircra works, or extraordin
TGSOEP 21	 To minimise the direct impacts on fauna through impacts with vehicles, aircraft, entrapment in excavation works, or extraordinary exposure to predators, all personnel shall abide by the requirements of the Fauna Interaction Procedure (E-PRO-004) including: planned interactions in consultation with trained and licensed personnel; travel on existing access tracks only; minimise travel at dusk and dawn; recording of all fauna interactions including location data and date; and capturing all fauna interactions (injury, relocation or fatality) as an event. 	All fauna interactions are captured as an event and reported in InControl. Event Report Review - Incident or event information reviewed in relation to fauna interactions. Trend Analysis is conducted to ensure ongoing identification of trends. Opportunistic Annual – Trend Analysis	E17_Event Reports 05-11-2024	Fauna interactions (evaporation pond) v (Event Management interactions in previ analysis).
TGSOEP 22	 To minimise the direct impacts on fauna through impacts with vehicles, aircraft, entrapment in excavation works, or extraordinary exposure to predators, all personnel shall abide by the requirements of the Fauna Interaction Procedure (E-PRO-004) including: planned interactions in consultation with trained and licensed personnel; travel on existing access tracks only; minimise travel at dusk and dawn; recording of all fauna interactions including location data and date; and capturing all fauna interactions (injury, relocation or fatality) as an event. 	Any evidence of fauna impacts to site are identified and actioned. Facility HSE Inspection. Housekeeping inspections at each site to ensure adequacy of controls including evidence of trapped fauna. 6 monthly	E17_Event Reports 05-11-2024	The kangaroo tracks been present but ha
TGSOEP 23	 To minimise the direct impacts on fauna through impacts with vehicles, aircraft, entrapment in excavation works, or extraordinary exposure to predators, ensure any open trench (outside of a fenced facility) shall require at a minimum the: completion of daily trench inspections within 3 hours of sunrise installation of fauna egress from excavations or trenches (i.e. exit ramps every 500m of trench at a minimum) inspection of pipework for fauna prior to welding, including use of caps for pipe sections; installation of fauna shelters every 100m if trench is >500m in length fencing shall be considered in sensitive areas and where feasible; and completion of a fauna inspection within 30mins prior to lowering in/backfill operations commencing 	Any non-compliances in relation to trench management are closed out within 2 days - Project Environmental Inspections - Inspections against a pre-determined checklist to review environmental management of key risk areas including fauna inspections and egress controls. Weekly during construction activities	C05_E-AUD-120 TGS OEP Draft Audit Findings	There were no open period.



t	Status
butlines driving on access tracks only and driving at dusk and dawn. ter (E17) repoorts no incident of impacvts es, aircraft, entrapment in excavation extraordinary exposure to predators.	Compliant
ractions (kangaroo tracks inside n pond) were recorded in INX InControl nagement System) INX19293. Two fauna s in previous reporting period (trend	Compliant
oo tracks indicated that a kangaroo had ont but had exited the area INX19293.	Compliant
e no open trenches during the reporting	Not applicable

Commitment	Requirement	Measurement Criteria	Evidence	Assessment	Status
TGSOEP 24	To minimise the direct impacts on fauna through impacts with vehicles, aircraft, entrapment in excavation works, or extraordinary exposure to predators, ensure gates are maintained as required (as found) to prevent livestock loss and minimise stock crossing points.	No landholder complaints in relation to poor livestock interactions. Landholder Management System (LMS). Records of landholder interactions including complaints. Annual	E08_TGS Communication Log July 2023 to 17 Oct 2024	There were no landowner complaints in relation to livestock in the reporting period.	Not applicable
TGSOEP 25	 To minimise the temporary and permanent reduction or fragmentation of existing fauna habitat, AGIT shall implement the Native Vegetation Clearance Procedure (E- PRO-002) in relation to: the identification of potential conservation significant fauna species as part of the ACV development; checking for fauna in habitat trees prior to clearing; minimisation of clearing to reduce habitat fragmentation; and conducting clearing in a manner that does not trap fauna. 	No non-compliances identified against requirements of the Native Vegetation Clearance Procedure - HSE System Audit. A HSE System Audit against the requirements of the Native Vegetation Clearance Procedure (E-PRO-002). Once every three years	C05_E-AUD-120 TGS OEP Draft Audit Finding	No works clearing native vegetation were undertaken associated with TGS operations in the reporting period.	Not applicable
TGSOEP 26	 To avoid disturbance to Aboriginal heritage sites identified for protection near the pipeline corridor, all clearing is managed through an internal authorisation process which facilitates pre clearing checks by a competent person to: review the proposed location of clearing and conduct cultural impact assessment; assess impacts to sites via the GIS system; obtain any approvals required to ensure compliance to all relevant laws; and establish any conditions necessary in order to avoid or minimise cultural impact. 	All vegetation clearing conducted in compliance with internal authorisation process. Vegetation Clearing Review - Review of all vegetation clearing for compliance to conditions set out in the ACV under the Native Vegetation Clearance Procedure including Cultural Heritage. Annual	C05_E-AUD-120 TGS OEP Draft Audit Finding	No works clearing native vegetation were undertaken associated with TGS operations in the reporting period.	Not applicable
TGSOEP 27	 To avoid disturbance to Aboriginal heritage sites identified for protection near the pipeline corridor, all clearing is managed through an internal authorisation process which facilitates pre clearing checks by a competent person to: review the proposed location of clearing and conduct cultural impact assessment; assess impacts to sites via the GIS system; obtain any approvals required to ensure compliance to all relevant laws; and establish any conditions necessary in order to avoid or minimise cultural impact. 	No non-compliances identified against requirements of the Native Vegetation Clearance Procedure. HSE System Audit. A HSE audit undertaken to assess EP and procedural controls are implemented including compliance to the Native Vegetation Clearance Procedure. One system audit every two years	C05_E-AUD-120 TGS OEP Draft Audit Finding	No works clearing native vegetation were undertaken associated with TGS operations in the reporting period.	Not applicable
TGSOEP 28	 To manage new Aboriginal heritage sites/artefacts uncovered or identified in accordance with the requirements of the Aboriginal Heritage Act 1972, all relevant personnel working on or near an Aboriginal site shall be made aware of their responsibilities under the Aboriginal Heritage Act 1972. This includes: no clearing outside of approved areas; and if a previously unidentified cultural heritage site is uncovered then a 30m buffer must be established around the new site within which work must cease. 	The HSE Field Audit confirms completion of mandatory training including induction (which contains Cultural Heritage requirements). HSE Field Audit Report - A HSE Checklist approach to assess EP and procedural controls are implemented including completion of all mandatory training (including the induction) Annual	E06_TGS-Z-MAN-006-01_2 Operations Induction	 The induction outlines: Cultural heritage is known within Urala. If identified, please do not disturb the site and notify the Operator's Representative. No entry to these areas is required for operations; If artefacts are found. All work in the area must stop, notify the Operator's Representative and establish a 30m exclusion zone. 	Compliant
TGSOEP 29	 To manage new Aboriginal heritage sites/artefacts uncovered or identified in accordance with the requirements of the Aboriginal Heritage Act 1972, all relevant personnel working on or near an Aboriginal site shall be made aware of their responsibilities under the Aboriginal Heritage Act 1972. This includes: no clearing outside of approved areas; and if a previously unidentified cultural heritage site is uncovered then a 30m buffer must be established around the new site within which work must cease. 	All events relating to identification of a cultural heritage site are captured as an Event. Event Report Review - Incident or event information reviewed in relation to impacts on cultural heritage. Trend Analysis is conducted to ensure ongoing identification of trends. Opportunistic Annual (Trend Analysis)	E17_Event Reports 05-11-2024 C05_E-AUD-120 TGS OEP Draft Audit Finding	No events relating to identification of a cultural heritage site were identified in the reporting period (E17). No works clearing native vegetation were undertaken associated with TGS operations in the reporting period.	Not applicable



Commitment	Requirement	Measurement Criteria	Evidence	Assessment	Status
TGSOEP 30	To avoid impacts to landholder including livestock, access, water and weeds, landholders are communicated with at least annually and complaints responded to within 14 days.	LMS verifies the 100% response within timeframes to all received complaints. LMS review. Annual and Opportunistic	E08_TGS Communication Log July 2023 to 17 Oct 2024	Landowner consultation report (E08) confirms landholders are communicated with at least annually. No landholder complaints received during the reporting period.	Compliant
TGSOEP 31	To minimise emissions of natural gas, all gaseous emissions shall be monitored to enable informed operations that minimize emissions to the extent practicable.	100% compliance with statutory requirements in relation to gas emissions. Emissions Monitoring. Continuous monitoring and/or calculation of planned emissions and unplanned emissions. Quarterly and Annual	R09_2023 Q3 TGS_Quarterly Emissions R10_2023 Q4 TGS_Quarterly Emissions R11_2024 Q1 TGS_Quarterly Emissions R12_2024 Q2 TGS_Quarterly Emissions E18_NGER E-REP-179 FY24 TGS S19 SUBMITTED REPORT	 Gaseous emissions are monitored and reported: Emissions and Discharges reports are submitted quarterly to DEMIRS (R09, R10, R11, R12) National Greenhouse Energy Reporting reports are submitted annually to Clean Energy Regulator (E18) 	Compliant
TGSOEP 32	To minimise emissions of natural gas, all unplanned emissions shall be reported.	All unplanned emissions are captured as an event and reported in InControl. Event Report Review	E17_Event Reports 05-11-2024 R10_2023 Q4 TGS_Quarterly Emissions R11_2024 Q1 TGS_Quarterly Emissions	Two emissions of natural gas reported in INX in the reporting period INX19185 and INX19505. Note: No unplanned emissions were reported in the DEMIRS Emissions and Discharges Report for either of these events. OFI: Ensure unplanned emissions events are reported in the DEMIRS Emissions and Discharges Quarterly Report	Compliant
TGSOEP 33	 To minimise dust impacts from activities, where excessive airborne dust is generated or a substantiated landholder complaint received, any combination of one or more of the following shall be implemented as required. This includes: the application of water or stabilisers via water trucks and sprayers to dampen down soil and stockpiles. No run-off should be generated from application. Applications shall be frequent enough to provide persistent dust suppression; ensuring vehicles with dust emitting loads must be covered (except when loading and unloading); and capturing any dust or particles emissions from grit blasting activities; 	All corrective actions for dust complaints are closed out within the due date. Event Report Review. Incident or event information reviewed in relation to unplanned emissions, odorant release or dust complaints and trend analysis process to capture ongoing event trends. Opportunistic Annual – Trend Analysis Inspections against a pre-determined checklist to review environmental management of key risk areas including emissions especially dust management and noise controls. Weekly during construction activities	E08_TGS Communication Log July 2023 to 17 Oct 2024	No dust complaints were received in the reporting period (E08).	Compliant
TGSOEP 34	Minimise noise impacts from construction and operations activities, especially venting from pigging by implementing noise controls as required to minimise noise impacts including notification to landholders / stakeholders prior to commencement of potentially noisy activities.	No landholder complaints received in relation to noise. Land Management System (LMS). The LMS assists in identifying local landholders / stakeholder and captures ongoing consultation and notifications. Annual and Opportunistic	E08_TGS Communication Log July 2023 to 17 Oct 2024	No noise complaints were received in the reporting period (E08).	Compliant
TGSOEP 35	 To ensure that natural surface water flow patterns are not detrimentally impacted by AGIT activities, AGIT shall implement the Waterway Crossing Procedure (E-PRO-017) including requirements to ensure: all approvals are in place prior to any impact to beds and banks; water crossings are maintained in a stable condition; and erosion controls are installed to prevent sedimentation into waterways. 	Aerial Surveillance monitors the stability of erosion controls at waterway crossings on a monthly basis. Aerial inspections review waterway crossings as well as signs of erosion or impacts to waterways. Monthly	E20_AGID Ashburton West Pipeline Aerial Surveillance Report June 2024	Erosion repairs were implemented at WAWP ROW KP 82.92 and monthly inspection of affected area undertaken (E20).	Compliant
TGSOEP 36	 To ensure that natural surface water flow patterns are not detrimentally impacted by AGIT activities, AGIT shall implement the Waterway Crossing Procedure (E-PRO-017) including requirements to ensure: all approvals are in place prior to any impact to beds and banks; water crossings are maintained in a stable condition; and erosion controls are installed to prevent sedimentation into waterways. 	A HSE System Audit verifies that regulatory conditions and the Waterway Crossing Procedure (E-PRO-017) are implemented. A HSE System Audit shall be undertaken during construction against the Waterway Crossing Procedure (E-PRO-017) to assess implementation and effectiveness. Once during implementation	C05_E-AUD-120 TGS OEP Draft Audit Findings	No waterway construction works were undertaken in the reporting period.	Not applicable



Commitment	Requirement	Measurement Criteria	Evidence	Assessment	Status
TGSOEP 37	To minimise any impacts from groundwater abstraction including to other land users and local vegetation, AGIT shall monitor and comply with all surface and groundwater license conditions including volume.	Annual license abstraction conditions are 100% compliant. Project Environmental Inspections ensures all project controls are in place including tracking of water (abstraction and discharge) Weekly during project Annual reporting (online) against approved volumes Maximo records of abstraction Groundwater license register	E13 _SWL166334(6) M02_MS112_MS1209 CAR Evidence Request Response Rev 2 C05_E-AUD-120 TGS OEP Draft Audit Findings	The annual surface water licence allocation is 34,600kL (E10). The volume abstracted for the reporting year was 530 kL (M02). No groundwater is currently being abstracted (C05)(applicable licences GWL179552 and GWL179066).	Compliant
TGSOEP 38	AGIT shall ensure all activities minimise the risk of surface and groundwater contamination through the maintenance of waste water systems, approval for any water discharge offsite and contained storage of waste liquids.	Project Environmental Inspections ensure all water discharges are managed as per requirements under legislation, ANZECC or dewatering guidelines and records kept.	E15_TGS-C-020-01_B4_24.02.2022 - Evap Pond Plan and Design R09_2023 Q3 TGS_Quarterly Emissions R10_2023 Q4 TGS_Quarterly Emissions R11_2024 Q1 TGS_Quarterly Emissions R12_2024 Q2 TGS_Quarterly Emissions	Liquid wastes are contained in the evaporation pond (E15). Excluding waste disposed offsite, there are no other offsite discharges (E09, E10, E11, E12).	Compliant
TGSOEP 39	AGIT shall ensure all activities minimise the risk of surface and groundwater contamination through the maintenance of waste water systems, approval for any water discharge offsite and contained storage of waste liquids.	Biocycle septic systems running as per requirements and verified through event reports and maintenance logs. Operational records of scheduling and completion of maintenance to RO and Septic systems as required under the Asset Management Plan (AMP). Annual (at minimum). Work Orders Incident or event information reviewed in relation to discharge of waste water to surface water or groundwater and annual Trend Analysis. Annual – Trend Analysis	E24_ATU Service Report 28 February 2024	ATU service report was provided for February 2024. Note: 6 monthly Service report for August 2024 was not provided.	Compliant
TGSOEP 40	AGIT shall ensure all activities minimise the risk of surface and groundwater contamination through the maintenance of waste water systems, approval for any water discharge offsite and contained storage of waste liquids.	Waste Contractor records verify the removal and disposal location of waste liquids as required. Waste Transfer Monitoring. Records of waste liquid, including hazardous wastes removed from site from waste contractor including disposal locations. Quarterly	E24_Cleanaway Controlled Waste Docket WO15587504 16.05.24	Cleanaway controlled waste docket verifies the removal and disposal location of waste liquid emulsion to Toxfree Karratha (E24). No septic waste was taken offsite in the reporting period.	Compliant
TGSOEP 41	 To prevent the contamination of groundwater, surface water and soil due to accidental spills of hazardous materials all chemicals management shall comply with S-PRO-016 Hazardous Materials Storage and Handling Procedure. This includes: an approval process for all hazardous chemicals including minimisation of volumes held onsite; ensuring secondary containment is in place; labelling all containers; signage is implemented for storage locations; and the availability of a current SDS to personnel. 	Facility HSE or Project Environmental Inspections verify the implementation of hazardous substances controls (including discharge) with any non-conformances actioned within one week. Facility HSE Inspections and Project Environmental Inspections Project Environmental Inspections - Inspections against a pre- determined checklist to review environmental management of key risk areas including storage of hazardous goods, spill kits and SDS. Weekly during construction activities Facility HSE Inspections -Housekeeping inspections at each site to ensure adequacy of controls including bunding and labelling of hazardous goods and spill kit adequacy. 6 monthly	E10_Weekly HSE Inspection - Alltype Slug Catcher 19-05-24 E11_Weekly HSE Inspection - Alltype Slug Catcher 26-05-24	 Weekly HSE inspection verifies: MSDS's and chemical register available and up to date (4.11) Spill kits are available and stocked (4.12) Hazardous liquid substances are all stored in bunded areas (4.13) Hazardous substances are all labelled and lidded (4.13) Compliant SDS (5 year date) and approved chemical risk assessments are available and reviewed for any chemicals used and controls in place (4.15) <u>OFI:</u> Add checks of the specific required chemical signage to the Weekly HSE inspection checklist. 	Compliant
TGSOEP 42	 To prevent the contamination of groundwater, surface water and soil due to accidental spills of hazardous materials all chemicals management shall comply with S-PRO-016 Hazardous Materials Storage and Handling Procedure. This includes: an approval process for all hazardous chemicals including minimisation of volumes held onsite; ensuring secondary containment is in place; labelling all containers; signage is implemented for storage locations; and the availability of a current SDS to personnel. 	All corrective actions relating to hazardous substances are closed out within the due date. Field Audits	E10_Weekly HSE Inspection - Alltype Slug Catcher 19-05-24	No corrective actions related to hazardous substances were raised during the weekly HSE Inspection 19/05/2024 (E10).	Not applicable



Commitment	Requirement	Measurement Criteria	Evidence	Assessment	Status
TGSOEP 43	 To prevent the contamination of groundwater, surface water and soil due to accidental spills of hazardous materials all chemicals management shall comply with S-PRO-016 Hazardous Materials Storage and Handling Procedure. This includes: an approval process for all hazardous chemicals including minimisation of volumes held onsite; ensuring secondary containment is in place; labelling all containers; signage is implemented for storage locations; and the availability of a current SDS to personnel. 	All corrective actions relating to hazardous substances are closed out within the due date. HSE System Audit	E07_20240326 TGS Flowlines Project - HSE Field Audit (INX-19577) C05_E-AUD-120 TGS OEP Draft Audit Finding	No corrective actions relating to hazardous substances were identified in HSE Field Audit 26/03/2024 (E07).	Not applicable
TGSOEP 44	 To prevent the contamination of groundwater, surface water and soil due to accidental spills of hazardous materials all chemicals management shall comply with S-PRO-016 Hazardous Materials Storage and Handling Procedure. This includes: an approval process for all hazardous chemicals including minimisation of volumes held onsite; ensuring secondary containment is in place; labelling all containers; signage is implemented for storage locations; and the availability of a current SDS to personnel. 	All major operational facilities have an up to date site register available - ChemAlert Register	C05_E-AUD-120 TGS OEP Draft Audit Finding E10_Weekly HSE Inspection - Alltype Slug Catcher 19-05-24 E11_Weekly HSE Inspection - Alltype Slug Catcher 26-05-24	ChemAlert Register checked during Weekly HSE Inspection (E10, E11).	Compliant
TGSOEP 45	Minimise the residual impacts to groundwater, surface water and soil associated with accidental spills with the appropriate spill response equipment, including containment and recovery equipment, available on site and in vehicles undertaking work where there is the potential for fuel or chemical spillage.	Facility HSE or Project Environmental Inspections confirm that suitable spill response equipment is in place with any non- conformances actioned within one week. Facility HSE Inspections and Project Environmental Inspections	C05_E-AUD-120 TGS OEP Draft Audit Finding E26_Enviromentalinspection 20241012	Weekly HSE Inspection stocktakes all spill kits for restocking.	Compliant
TGSOEP 46	All spills shall be contained as soon as possible and clean up actioned as soon as feasible to minimise the residual impacts to groundwater, surface water and soil associated with accidental spills.	The Event Report Review verifies the completion of actions associated with any spills and 100% close out of actions by the due date. Incident or event information reviewed in relation to spills including annual trend analysis information for historical trending of events Opportunistic Annual – Trend Analysis	C05_E-AUD-120 TGS OEP Draft Audit Finding E17_Event Reports 05-11-2024	The five spills identified in the reporting period were contained and cleaned up: INX 19259 (09/12/2023) INX 19364 (15/01/2024) INX 19504 (03/03/2024) INX 20183 (12/10/2024) INX 20191 (14/10/2024)	Compliant
TGSOEP 47	Personnel shall be aware of and abide by requirements of the Oil Spill Response Procedure (E-PRO-016). Completion of annual spill drill (or equivalent process) to ensure awareness and knowledge of spill response requirements and escalation. Annual (or as per project specifications).	An oil spill (or equivalent scenario) drill is completed annually with documented report on outcomes and 100% close out of actions.	C05_E-AUD-120 TGS OEP Draft Audit Finding E22_Spill Drill June 2023	A spill drill was conducted under the OSCP on 09/06/2024. A thorough evaluation of the drill produced learnings and three corrective actions were raised following the drill.	Compliant
TGSOEP 48	HSE Monthly Field Audit reviews SDS compliance, secondary containment (including liquid wastes) and labelling of hazardous chemicals.	HSE Field Audit Checklist	E10_Weekly HSE Inspection - Alltype Slug Catcher 19-05-24 E11_Weekly HSE Inspection - Alltype Slug Catcher 26-05-24	Refer to EP 6.9.1. This commitment is met during weekly HSE inspections.	Compliant
TGSOEP 49	System Audit conducted once every three years to confirm compliance to the Hazardous Materials Handling and Storage procedure.	HSE System Audit Report Dangerous Goods training records Dangerous Goods licences (transport)	M02_MS112_MS1209 CAR Evidence Request Response Rev 2	No System Audit has been undertaken to confirm compliance to the Hazardous Materials Handling and Storage procedure. The last HSE compliance audit was 04/04/2021 and it did not audit hazardous materials handling.	Potentially non-compliant



Commitment	Requirement	Measurement Criteria	Evidence	Assessment	Status
TGSOEP 50	 To prevent contamination or environmental harm due to inappropriate storage or disposal of waste all personnel shall abide by the Waste Management Procedure (E- PRO-015). This includes requirements for: ensuring the labelling of receptacles and that they have lids or appropriate covers; removing all non-operational equipment and waste post project works; ensuring that segregation and containment are appropriate; and all liquid chemical waste disposal includes bunding during storage 	Compliance to the Waste Management Procedure (E-PRO-015) shall be verified through HSE Field Audits with close out of actions 100% by due date. HSE Field Audit. A HSE Checklist approach to assess EP and procedural controls are implemented including waste receptacles being lidded and labelled, segregation, bunding for hazardous liquid wastes and adequacy of disposal. Opportunistic. Evaluation Reports	E26_Enviromentalinspection 20241012	 Field inspections (E26)have been undertaken with the following prompts: Are the bins emptied and not overflowing? Are bins being used for the type of recycling they are designed for? 	Compliant
TGSOEP 51	 To prevent contamination or environmental harm due to inappropriate storage or disposal of waste all personnel shall abide by the Waste Management Procedure (E- PRO-015). This includes requirements for: ensuring the labelling of receptacles and that they have lids or appropriate covers; removing all non-operational equipment and waste post project works; ensuring that segregation and containment are appropriate; and all liquid chemical waste disposal includes bunding during storage 	Compliance to the Waste Management Procedure (E-PRO-015) shall be verified through Project Environmental and Facility HSE Inspections with close out of actions 100% by due date. Project Environmental Inspections - Inspections against a pre- determined checklist to review environmental management of key risk areas including waste management. Weekly during construction activities. Project Environmental Inspection Checklist Facility HSE Inspections - Housekeeping inspections at each site to ensure adequacy of controls including waste management such as litter, use of bins and labels on bins. 6 monthly. Facility HSE Inspection Checklist	E10_Weekly HSE Inspection - Alltype Slug Catcher 19-05-24 E11_Weekly HSE Inspection - Alltype Slug Catcher 26-05-24	 HSE inspections have been undertaken with the following prompts: Segregation of waste streams including hydrocarbon waster and batteries (4.16) Waste containers are lidded and labelled and no stockpiles of waste in evidence (4.17) Covering over skip bins (except scrap metal) to prevent fauna attraction (4.18) All liquid chemical wastes are in a bunded area or have secondary containment (4.19) 	Compliant
TGSOEP 52	To prevent contamination or environmental harm due to inappropriate storage or disposal of waste all waste (including pigging waste) shall be captured and stored and then disposed of by a licensed contractor to a licensed waste facility (except sewage where treated onsite).	All waste records are captured and reported quarterly. Waste Transfer Monitoring. Reporting of waste amounts including type and volume. Quarterly. Quarterly Emissions Report. Contractor supplied waste records / receipts	E14_Remondis TGS FY2024 Report E24_Cleanaway Controlled Waste Docket WO15587504 16.05.24 E23_ATU Service Report 28 February 2024 E15_TGS-C-020-01_B4_24.02.2022 - Evap Pond Plan and Design	Waste is captured and taken offsite to Karratha for disposal (E14, E24). Sewage is treated on site through the ATU (BioMax system) (E23). Process water and condensate is discharged into the evaporation pond (E15).	Compliant
TGSOEP 53	To prevent contamination or environmental harm due to inappropriate storage or disposal of waste sewage shall be treated onsite prior to disposal either via water treatment system or pumped to a septic or portable tank where sludge is retained for collection and offsite disposal by a licenced contractor. The drill camp may include irrigation of treated waste water in approved areas only.	Project Environmental Inspections verify the capture, treatment and containment of all sewage waste.	Not applicable	No project related activity under operations undertaken in the reporting period.	Not applicable
TGSOEP 54	To prevent contamination or environmental harm due to inappropriate storage or disposal of waste sewage shall be treated onsite prior to disposal either via water treatment system or pumped to a septic or portable tank where sludge is retained for collection and offsite disposal by a licenced contractor. The drill camp may include irrigation of treated waste water in approved areas only.	Annual check as part of AMP that sewage related work orders (Maximo) have been completed for Biomax systems and any irrigation of treated wastewater occurs in HSE approved areas only. Operational records of scheduling and completion of maintenance to RO and Septic systems as required under the Asset Management Plan (AMP). Annual (at minimum). Work Orders	C05_E-AUD-120 TGS OEP Draft Audit Finding E23_ATU Service Report 28 February 2024	Sewage is contained within the ATU (BioMax system) and serviced on a 6 monthly basis scheduled through Maximo as per licensed contractor Coral Coast Plumbing Report (E23) for inspection conducted 28/02/2024.	Compliant
TGSOEP 55	Project (construction activities) Environmental Inspections Weekly inspections against a pre-determined checklist to review environmental management of key risk areas including waste management.	Project Weekly Environmental Inspection Checklist completed weekly during construction activities.	Not applicable	No project related activity under operations undertaken in the reporting period.	Not applicable
TGSOEP 56	To meet rehabilitation criteria to minimise impacts from operations, ensure rehabilitation criteria set and monitoring in place to ensure recovery of disturbed locations no longer required for operational use.	As per rehabilitation criteria, annual monitoring completed and included with Annual Environmental Report.	R03_DBP2302_Tubridgi_Rehabilitation Report 2023	The December 2023 Rehabilitation Assessment Report (R03) recommended that further monitoring is continued to be undertaken for sites within CP3 communities that have not met completion criteria. All monitored sites have met the completion criteria associated with weeds. Rehabiltation monitoring was undertaken in 2024 and the report is pending at the time of this audit.	Compliant



Commitment	Requirement	Measurement Criteria	Evidence	Assessment	Status
TGSOEP 57	To meet rehabilitation criteria to minimise impacts from operations, immediately post disturbance activities, areas are reinstated including removal of all wastes and potential reduction of compaction impacts.	Final Construction Inspection Checklist includes all reinstatement activities including fencing, signage, access track conditions and awareness of rehabilitation areas. Checklist post construction (Construction completion sign off process) – Site Closure Inspection - A checklist assisted inspection of the suitability of reinstatement and rehabilitation efforts and ensure all construction materials, wastes and disturbance areas have been removed/reinstated. Once, upon construction completion.	M02_MS112_MS1209 CAR Evidence Request Response Rev 2	There was no site closure conducted in the reporting period.	Not applicable



Appendix H Construction Environmental Management Plan Compliance Assessment

Commitment	Requirement	Measurement Criteria	Timing	Evidence	Assessment	Status
CEMP 01	Separate Environment Plans will be prepared for the wells and flowlines under the Petroleum and Geothermal Energy Resources (Environment) Regulations 2012 to the satisfaction of the Department of Mines, Industry Regulation and Safety (DMIRS). The Wells Construction Environment Plan has been submitted and is under assessment.	 Approved DEMIRS wells and flowlines will be in place for the activity. 	Prior to commencement of project	R06_TGSP Flowlines EP_Rev 7 C10_TGSP Flowlines EP_Rev 7 Approval	The DEMIRS Flowline EP (R06) was approved for the project by DEMIRS (C10) 02/02/2024.	Compliant
CEMP 02	 Management targets / Threshold Criteria 100% of viable topsoil, stripped as part of well, flowline and access road construction, shall be retained for future reuse. Management action Any works impacting the topsoil or soil profile shall abide by the Native Vegetation Clearing Procedure (EPRO- 002) [or an equivalent procedure] which shall ensure at a minimum the: Rehabilitation and reinstatement of non- operational areas Segregation of topsoil and subsoil Topsoil stockpiles to not exceed 2 m in height Reinstatement of soil profile following excavation Ripping of compacted subsoil before reinstating topsoil Authorisation to Clear Vegetation (ACV) or an equivalent process is implemented Dust suppression to control soil loss. 	A HSE System Audit will be undertaken against the Native Vegetation Clearing Procedure (E-PRO- 002)/or equivalent procedures to assess implementation and effectiveness.	Once during the construction phase, whilst clearing is occurring.	E03_ACV0167_TGS Expansion Flowlines	 A Vegetation Clearance Review was conducted which verified that all clearing was conducted in compliance with the internal approval process, however it did not document: Rehabilitation and reinstatement of non-operational areas Segregation of topsoil and subsoil Topsoil stockpiles to not exceed 2 m in height Reinstatement of soil profile following excavation Ripping of compacted subsoil before reinstating topsoil Dust suppression to control soil loss. 	Potentially non-compliant
CEMP 03	Management targets / Threshold Criteria No new areas of significant soil erosion are created as a result of the TSGP wells and facilities. Management action If erosion is identified associated with AGIG activities, erosion repairs shall be undertaken and if warranted, erosion and sediment control structures shall be constructed.	Project environmental inspections will be undertaken against a pre-determined checklist to review environmental management of key risk areas soil erosion	Weekly during the construction phase	E21_Weekly HSE Inspection - PC TRW8-6 Coaters 17-03-24 C06_E-AUD-119 TGS Flowlines EP Draft Audit E27_DBP-S-REG-054 Project Corrective Action Register Rev0 - TGS Expansion Project - 28.03.2024	Weekly inspection (E21) inspects for risk areas soil erosion. No erosion was identified (C06).	Compliant
CEMP 04	 Management targets / Threshold Criteria No new areas of significant soil erosion are created as a result of the TSGP wells and facilities. Management action If erosion is identified associated with AGIG activities, erosion repairs shall be undertaken and if warranted, erosion and sediment control structures shall be constructed. 	Monitoring of erosion events via the use of aerial surveillance as documented in Aerial Surveillance Reports.	Monthly	C09_EXTERNAL_ MS112_MS1209 Aerial Surveillance Response	There is no evidence that aerial surveillance monitoring of the installed flowlines is being undertaken.	Potentially non-compliant

Table H.5: Construction Environmental Management Plan Audit Table [E-PLN-042 Rev 1]



Commitment	Requirement	Measurement Criteria	Timing	Evidence	Assessment
CEMP 05	 Management targets / Threshold Criteria No new areas of significant soil erosion are created as a result of the TSGP wells and facilities. Management action The Procedure for Management of Erosion Risk Areas (E-PRO-003) shall be implemented including: Sticking to existing tracks Rehabilitation of non-operational areas Erosion controls implemented on stockpiles (where required) or discharge points. 	Project environmental inspections will be undertaken against a pre-determined checklist to review environmental management of key risk areas soil erosion	Weekly during the construction phase	E21_Weekly HSE Inspection - PC TRW8-6 Coaters 17-03-24 C06_E-AUD-119 TGS Flowlines EP Draft Audit E27_DBP-S-REG-054 Project Corrective Action Register Rev0 - TGS Expansion Project - 28.03.2024	Weekly inspection (E21) insp erosion was identified (C06).
CEMP 06	 Management targets / Threshold Criteria If encountered, all ASS or PASS is identified and effectively treated prior to reinstatement Management action Prior to excavation to a depth greater than 3m or excavation of a total of 100 m3; or dewatering, consult the GIS Environmental Database and characterise the ASS risk ranking of the proposed disturbance site. Within areas of a moderate – high risk of ASS, conduct an ASS investigation prior to conducting the works if those works will either disturb more than 100m3 of soil or require dewatering. Where practicable, avoid disturbance in areas where ASS are identified. If evidence of ASS is found post excavation, sampling and treatment shall be undertaken prior to any backfill operations. Review risk of encounter of ASS using WA ASS Risk Map. Implement ASS Management Plan. 	Monitoring of ASS against the requirements of the ASS Management Plan as documented in the ASS Management Plan Audit Report	Once during construction earthworks activities.	C06_E-AUD-119 TGS Flowlines EP Audit E03_ACV0167_TGS Expansion Flowlines	 ACV 167 (E06) identifies that due to the nature of the is considered unlikely (proximity to an area w ASS should be avoided AGIG report (C06) confrisk areas was undertained
CEMP 07	Management targets / Threshold Criteria No significant hydrocarbon, chemical or sewage spills to land (>500L) during construction activities.	 Any spills of hydrocarbons, sewage or chemicals shall be entered into INX InControl (the AGIT internal Event Management System). The following details will be recorded: Date/Time and Location. Type of spill and volume. Response measures implemented. 	Within 24hrs of any spill event occurring during construction phase	C06_E-AUD-119 TGS Flowlines EP Draft Audit E32_INX 19504 Investigation Report Diesel Spill TGS March 2024	There was one unplanned dia reported during the reportin threshold criteria. Immediate the incident was investigated being tracked through to cor
CEMP 08	 Management targets / Threshold Criteria No significant hydrocarbon, chemical or sewage spills to land (>500L) during construction activities. Management action Septic waste will be managed and monitored in accordance with the Waste Management Procedure (E-PRO-015). Wastewater management including biocycle septic and system maintenance and evaporation pond leak detection and inspections. 	 Project environmental inspections will be undertaken against a pre-determined checklist to review environmental management of key risk areas including hydrocarbon, sewage and chemical handling and storage areas. A HSE System Audit will be undertaken against the Hazardous Materials Storage and Handling Procedure and Waste Management Procedure to assess implementation and effectiveness. 	Weekly during the construction phase	E21_Weekly HSE Inspection - PC TRW8-6 Coaters 17-03-24 M02_MS112_MS1209 CAR Evidence Request Response Rev 2 C06_E-AUD-119 TGS Flowlines EP Draft Audit E27_DBP-S-REG-054 Project Corrective Action Register Rev0 - TGS Expansion Project - 28.03.2024	The weekly HSE Inspection (E Septic waste from ablutions No HSE System Audit was un was operational (M02). No spills of sewage were rep



	Status
spects for risk areas soil erosion. No 5).	Compliant
at: the clearing; interaction with ASS soils ((however, please note TRW-2 is in the with high to moderate risk). ed through no excavation. nfirms that no excavation within ASS taken during the reporting period.	Compliant
discharge, 200L diesel spill (E32), ing period. This did not trigger the ate actions undertaken were recorded, ed and further corrective actions are ompletion.	Compliant
(E21) confirms there are no spills of s block (4.23). Indertaken while the construction camp eported in the reporting period (C06).	Compliant

Commitment	Requirement	Measurement Criteria	Timing	Evidence	Assessment	Status
CEMP 09	 Management targets / Threshold Criteria No significant hydrocarbon, chemical or sewage spills to land (>500L) during construction activities. Management action All chemicals used shall be transported, stored and handled and disposed of in accordance with the requirements of the relevant legislation and industry standards and S-PRO-016 Hazardous Materials Storage and Handling Procedure. This includes: MSDS's and Chemical register available onsite. Spill kits in heavy vehicles and at all storage locations. Use of drip trays during refuelling / vacuum removal from tanks. Bunding/self-containment of fixed plant and equipment (i.e. Generators). All liquid chemical waste disposal includes bunding during storage. ChemAlert subscription including risk assessment, max storage volumes and approval process 	 Project environmental inspections will be undertaken against a pre-determined checklist to review environmental management of key risk areas including hydrocarbon, sewage and chemical handling and storage areas. A HSE System Audit will be undertaken against the Hazardous Materials Storage and Handling Procedure and Waste Management Procedure to assess implementation and effectiveness. 	Weekly during the construction phase	E21_Weekly HSE Inspection - PC TRW8-6 Coaters 17-03-24 E05_TGS Expansion Wells and Flowlines Construction System Audit E27_DBP-S-REG-054 Project Corrective Action Register Rev0 - TGS Expansion Project - 28.03.2024	 Weekly HSE Inspections verify: The availability of a current SDS to personnel (4.15) That the project has an up-to-date chemical site register available (4.11). Use of drip trays under refuelling points (4.08); Secondary containment (Chemicals, fixed plant and chemicals) is in place (4.13); All liquid chemical waste disposal includes bunding during storage (4.19). The pre-construction audit (E05) confirms: SDS are located on site (ENV-0027) The chemical register is available onsite (ENV-0028) Bunding/self-containment of fixed plant and equipment (i.e. Generators) (ENV-0032) All liquid chemical waste disposal includes bunding during storage (ENV-0038). Preconstruction audit identified corrective action on use of drip trays which was completed by 31/12/2023. 	Compliant
CEMP 10	 Management targets / Threshold Criteria No significant hydrocarbon, chemical or sewage spills to land (>500L) during construction activities. Management action Refuelling process: all mobile refuelling will be undertaken within the access track, well site or campsite cleared area (away from environmentally sensitive areas). use of drip trays under refuelling points. fuel transfer operations to be attended at all times. No hazardous materials handling will be undertaken within 100 m of a watercourse (i.e. refuelling, decanting) except for <20L water abstraction pump inside a bunded area. 	 Project environmental inspections will be undertaken against a pre-determined checklist to review environmental management of key risk areas including hydrocarbon, sewage and chemical handling and storage areas. A HSE System Audit will be undertaken against the Hazardous Materials Storage and Handling Procedure and Waste Management Procedure to assess implementation and effectiveness. 	Weekly during the construction phase	E21_Weekly HSE Inspection - PC TRW8-6 Coaters 17-03-24 E27_DBP-S-REG-054 Project Corrective Action Register Rev0 - TGS Expansion Project - 28.03.2024	 Weekly HSE Inspection confirms that: All mobile refuelling is undertaken within the access track or flowlines (4.02) No hazardous materials handling will be undertaken within 100 m of a watercourse (i.e. refuelling, decanting) except for <20L water abstraction pump inside a bunded area (4.07) Use of drip trays under refuelling points (4.08); Fuel transfer operations are always attended (4.09); 	Compliant
CEMP 11	 Management targets / Threshold Criteria No significant hydrocarbon, chemical or sewage spills to land (>500L) during construction activities. Management action E-PRO-015 Waste Management Procedure sets out the controls for waste onsite and the disposal process including the: Licensing of waste contractor Segregation of waste streams including hydrocarbon waster and batteries Collection of all pigging waste in sealed containers Bunding or containment of liquid wastes. 	 Project environmental inspections will be undertaken against a pre-determined checklist to review environmental management of key risk areas including hydrocarbon, sewage and chemical handling and storage areas. A HSE System Audit will be undertaken against the Hazardous Materials Storage and Handling Procedure and Waste Management Procedure to assess implementation and effectiveness. Any spills of waste shall be entered into INX InControl (the AGIT internal Event Management System). The following details will be recorded: Date/Time and Location. Type of spill and volume. Response measures implemented. 	Weekly during the construction phase	E21_Weekly HSE Inspection - PC TRW8-6 Coaters 17-03-24 E14_Remondis TGS FY2024 Report E05_TGS Expansion Wells and Flowlines Construction System Audit C06_E-AUD-119 TGS Flowlines EP Draft Audit E27_DBP-S-REG-054 Project Corrective Action Register Rev0 - TGS Expansion Project - 28.03.2024	 Weekly inspection confirms: Segregation of waste streams including hydrocarbon waste and batteries (4.16); Bunding or containment of liquid wastes (4.19) Waste records (E14) show that waste is removed by a licenced contractor. The pre-construction audit (E05) confirms: Licensing of waste contractor (ENV-0037) Bunding or containment of liquid wastes. AGIG report (C06) confirms that there were no spills of waste in the reporting period. 	Compliant



Commitment	Requirement	Measurement Criteria	Timing	Evidence	Assessment
CEMP 12	 Management targets / Threshold Criteria All waste is removed from the construction area at the completion of works. Management action All personnel shall abide by the Waste Management Procedure (E-PRO-015). This includes requirements for: Segregation of waste streams as far as possible Covering over skip bins (except scrap metal) to prevent fauna attraction Minimisation of wastes where possible (reduce, reuse) Ensuring the labelling of receptacles Frequent waste contractor removal of wastes to prevent build up Additional waste storage available in case of severe weather All waste shall be captured and stored and then disposed of in a licensed contractor to a licensed waste facility. 	Project environmental inspections will be undertaken weekly during the construction phase against a pre-determined checklist to review environmental management of key risk areas including waste handling and storage areas. A HSE System Audit will be undertaken once during the construction phase against the Waste Management Procedure to assess implementation and effectiveness.	Weekly during the construction phase	E21_Weekly HSE Inspection - PC TRW8-6 Coaters 17-03-24 E14_Remondis TGS FY2024 Report E05_TGS Expansion Wells and Flowlines Construction System Audit C06_E-AUD-119 TGS Flowlines EP Draft Audit E27_DBP-S-REG-054 Project Corrective Action Register Rev0 - TGS Expansion Project - 28.03.2024	 Weekly inspection (E21) conf Segregation of waste st Covering over skip bins fauna attraction (4.18) Minimisation of wastes Ensuring the labelling of Housekeeping to a high Waste records (E14) show th contractor. The pre-construction audit (E Licensing of waste cont Bunding or containment AGIG report (C06) confirms to the reporting period.
CEMP 13	 Management targets / Threshold Criteria All waste is removed from the construction area at the completion of works. Management action All personnel shall abide by the Waste Management Procedure (E-PRO-015). This includes requirements for: Segregation of waste streams as far as possible Covering over skip bins (except scrap metal) to prevent fauna attraction Minimisation of wastes where possible (reduce, reuse) Ensuring the labelling of receptacles Frequent waste contractor removal of wastes to prevent build up Additional waste storage available in case of severe weather All waste shall be captured and stored and then disposed of in a licensed contractor to a licensed waste facility. 	Monitoring of waste transfers will be undertaken, including type and volume.	Quarterly	C06_E-AUD-119 TGS Flowlines EP Draft Audit	Planned and unplanned emis installation and commissionir DEMIRS via the Quarterly Em



	Status
onfirms:	Compliant
onfirms: e streams as far as possible (4.16) ins (except scrap metal) to prevent 8) tes where possible (reduce, reuse) g of receptacles (4.17) igh standard (3.02) that waste is removed by a licenced : (E05) confirms: ontractor (ENV-0037) hent of liquid wastes. s that there were no spills of waste in	Compliant
nissions associated with the flowline ning project are not provided to Emissions Report.	Potentially non-compliant

Commitment	Requirement	Measurement Criteria	Timing	Evidence	Assessment	Status
CEMP 14	 Management targets / Threshold Criteria All vegetation clearing is conducted in compliance with the internal authorisation process and confines of the approved clearing areas. Management action All clearing shall be managed through an internal Native Vegetation Clearance Procedure (E-PRO-002): Authorisation to Clear Vegetation (ACV) or an equivalent process. Access track routes and well site and camp site locations will be selected to reduce requirement for clearing of conservation significant flora to ALARP including utilising existing cleared roads/tracks or well sites, where available. Delineation of approved area prior to clear and grade (pegging). Vegetation clearing to be undertaken in adherence to the ten clearing principles. Vehicle movements to be limited to established tracks. Areas of vegetation disturbance not required for future operational use shall be rehabilitated. 	A review of all vegetation clearing shall be undertaken to ensure compliance to regulatory approval conditions. This will be completed via a Vegetation Clearing review: • Vegetation Clearing Register • Completed clearing records (survey records)	Annually	E03_ACV0167_TGS Expansion Flowlines E01_E-REG-001-2 Vegetation Clearing Register E02_Cleared Areas	 Assessment shows that: Clearing was managed through the internal Native Vegetation Clearance Procedure ACV 167 (E03). Existing access tracks and camp sites were utilised where possible. Vehicle movements were limited to established tracks and flowline easements. Areas of vegetation disturbance not required for future were prepared for rehabilitation. ACV 167 states "Ensure that the clearing footprint is maintained to within the spatial limits of the well pad area" but does not require the delineation of approved flowline area prior to clear and grade (pegging). There is no reconciliation of the proposed area of clearing (E02) with the reported area (E01). 	Potentially non- compliant.
CEMP 15	 Management targets / Threshold Criteria All vegetation clearing is conducted in compliance with the internal authorisation process and confines of the approved clearing areas. Management action All clearing shall be managed through an internal Native Vegetation Clearance Procedure (E-PRO-002): Authorisation to Clear Vegetation (ACV) or an equivalent process. Access track routes and well site and camp site locations will be selected to reduce requirement for clearing of conservation significant flora to ALARP including utilising existing cleared roads/tracks or well sites, where available. Delineation of approved area prior to clear and grade (pegging). Vegetation clearing to be undertaken in adherence to the ten clearing principles. Vehicle movements to be limited to established tracks. Areas of vegetation disturbance not required for future operational use shall be rehabilitated. 	A HSE System Audit will be undertaken against the Native Vegetation Clearing Procedure (E-PRO- 002)/or equivalent Proposal procedures to assess implementation and effectiveness.	Once during the construction phase, whilst vegetation clearing activities are occurring.	E05_TGS Expansion Wells and Flowlines Construction System Audit	The HSE System Audit was not undertaken whilst vegetation clearing activities are occurring.	Potentially non- compliant.



Commitment	Requirement	Measurement Criteria	Timing	Evidence	Assessment
CEMP 16	Management targets / Threshold Criteria	Monitoring of areas recently cleared via the use of aerial	Monthly	C09_EXTERNAL_	There is no evidence that aeria
	No disturbance/removal of a priority listed flora species, without legislative approval.	surveillance as documented in Aerial Surveillance Reports.		MS112_MS1209 Aerial Surveillance Response	installed flowlines is being un
	Management action				
	 All clearing shall be managed through an internal Native Vegetation Clearance Procedure: Authorisation to Clear Vegetation (ACV) or an equivalent process. 				
	 Access track routes and well site and camp site locations will be selected to eliminate any clearing of conservation significant flora to ALARP including utilising existing cleared roads/tracks or well sites, where available. 				
	 Delineation of approved area prior to clear and grade (pegging). 				
	 Vegetation clearing to be undertaken in adherence to the ten clearing principles. 				
	 Vehicle movements to be limited to established tracks. 				
CEMP 17	Management targets / Threshold Criteria No introduction or spread of significant weed species, as a result of TGPS construction activities.	Monitoring of weeds via the use of aerial surveillance as documented in Aerial Surveillance Reports.	Monthly	C09_EXTERNAL_ MS112_MS1209 Aerial Surveillance Response	There is no evidence that aeria installed flowlines is being und
	Management action				
	A Clean on Entry procedure shall be implemented that ensures:				
	 the delineation and demarcation of locations of high sensitivity to weeds or pathogens (i.e. COE areas); 				
	 the preferential scheduling of work in COE areas for drier periods; 				
	 clean on entry signage is installed for internal and external (third party) interest; and 				
	 the clean down of vehicles prior to entering COE areas (as per GIS database). 				
CEMP 18	Management targets / Threshold Criteria	A HSE System Audit will be undertaken against the Clean on	Once during the	E05_TGS Expansion Wells	Earthmoving equipment are ce
	No introduction or spread of significant weed species, as a result of TGPS construction activities.	Entry Procedure/or equivalent Proposal procedures to assess implementation and effectiveness.	construction phase, whilst earthworks are occurring.	and Flowlines Construction System Audit	weed and seed hygiene certific preconstruction audit (E05).
	Management action			C06_E-AUD-119 TGS	The Clean on Entry procedure (not within field) (C06).
	A Clean on Entry procedure shall be implemented that			Flowlines EP Draft Audit	
	 ensures: the delineation and demarcation of locations of high sensitivity to weeds or pathogens (i.e. COE areas); 				
	 the preferential scheduling of work in COE areas for drier periods; 				
	 clean on entry signage is installed for internal and external (third party) interest; and 				
	 the clean down of vehicles prior to entering COE areas (as per GIS database). 				



	Status
at aerial surveillance monitoring of the	Potentially
ng undertaken.	non-compliant
A second s	Detertielle
at aerial surveillance monitoring of the ng undertaken.	Potentially non-compliant
t are certified to be weeds and seeds free;	Compliant
certificates provided during 205).	
edure was applicable on entry to site only	

Commitment	Requirement	Measurement Criteria	Timing	Evidence	Assessment	Status
CEMP 19	 A targeted weed management program shall be undertaken to promote control of new or existing populations, this includes: the timely management of weed locations; the documentation of weed management activities; landholder liaison on weed management activities; the identification and management of Weeds of National Significance (WONS); ensuring no overspray or product being sprayed offsite; and keeping records of new or previously unreported weed areas. 	A HSE System Audit will be undertaken against the Clean on Entry Procedure/or equivalent Proposal procedures to assess implementation and effectiveness.	Once during the rehabilitation phase.	C06_E-AUD-119 TGS Flowlines EP Draft Audit E28_Weed Management WO 1001630251 E05_TGS Expansion Wells and Flowlines Construction System Audit	No reports of new weed infestations in INX Control (C06). No WONS identified (E05). Routine weed management (E28) undertaken as scheduled. No corrective actions raised in relation weed management.	Compliant
CEMP 20	Management targets / Threshold Criteria No bushfires are started as a direct result of TGSP construction activities. Management action Abide by all Bushfire Regulations including total fire ban requirements (conduct daily checks on fire danger rating for daily prestart)	A HSE System Audit will be undertaken against the relevant Permit to Work system, including hot works certificate to assess implementation and effectiveness.	Once during the construction phase, whilst earthworks are occurring.	E34_TGS Construction Daily Report #259 10-02- 2024 E35_TGS Construction Daily Report #309 19-04- 2024	The construction daily report (E27) reports on the fire danger rating. For the 10/02/2024 and 19/04/2024, the rating was High with no total fire ban in place.	Compliant
CEMP 21	 Management targets / Threshold Criteria No bushfires are started as a direct result of TGSP construction activities. Management action All activities are conducted in accordance with relevant fire restrictions (local, state), notifications and permitting procedures. This includes: Designated smoking areas. All plant and equipment comply to fire safety standards. Fire breaks are in place and maintained. High gas risk areas are demarcated and signed. Inductions include fire risks (hot works and smoking). Selected personnel are trained in responding to fires. Appropriate, maintained firefighting equipment is available at all times. All prohibited items are kept away from hazardous areas. Permit to Work and Hot Works Certificate including gas testing for hazardous areas as per the Hot Works Procedure 	A HSE System Audit will be undertaken against the relevant Permit to Work system, including hot works certificate to assess implementation and effectiveness.	Once during the construction phase, whilst earthworks are occurring.	E05_TGS Expansion Wells and Flowlines Construction System Audit E21_Weekly HSE Inspection - PC TRW8-6 Coaters 17-03-24	 The HSE Audit (E05) confirmed that the weekly HSE Inspection checklist (E21) verified the following: Designated smoking areas, no cigarette butts outside these areas (4.27) Firebreaks are in place and maintained (5.04). High gas risk areas are demarcated and signed (5.05). Inductions include fire risks (hot works and smoking (5.06). Appropriate, maintained firefighting equipment is available at all times (5.01). The HSE Audit (E05) found that one fire extinguisher required service which was completed 31/12/2023. OFI: Future HSE System Audits check: Selected personnel are trained in responding to fires. All prohibited items are kept away from hazardous areas. Permit to Work and Hot Works Certificate including gas testing for hazardous areas as per the Hot Works Procedure 	Compliant



Commitment	Requirement	Measurement Criteria	Timing	Evidence	Assessment	Status
CEMP 22	Management targets / Threshold Criteria No bushfires are started as a direct result of TGSP construction activities. Management action Project environmental inspections will be undertaken against a pre-determined checklist to review environmental management of key risk areas including firefighting equipment.	Project environmental inspections will be undertaken against a pre-determined checklist to review environmental management of key risk areas including firefighting equipment.	Weekly during the construction phase	E21_Weekly HSE Inspection - PC TRW8-6 Coaters 17-03-24 E27_DBP-S-REG-054 Project Corrective Action Register Rev0 - TGS Expansion Project - 28.03.2024	The weekly HSE inspection (E21) checks that there is appropriate, maintained firefighting equipment available at all times (5.01).	Compliant
CEMP 23	 Management targets / Threshold Criteria No clearing or disturbance to fauna habitat outside of approved clearing areas during construction. Management action All clearing shall be managed through an internal Native Vegetation Clearance Procedure (E-PRO-002): Authorisation to Clear Vegetation (ACV) or an equivalent process. Delineation of approved area prior to clear and grade (pegging). The identification of potential conservation significant fauna species Clearing will be undertaken in stages (to allow for progressive movement of fauna outside of disturbance area) Clearing will be conducted in a manner that does not entrap fauna. 	A review of all vegetation clearing shall be undertaken to ensure compliance to regulatory approval conditions. This will be completed via a Vegetation Clearing Review.	Annually	E03_ACV0167_TGS Expansion Flowlines E01_E-REG-001-2 Vegetation Clearing Register E02_Cleared Areas	 Assessment shows that: Clearing was managed through the internal Native Vegetation Clearance Procedure ACV 167 (E03). Existing access tracks and camp sites were utilised where possible. Vehicle movements were limited to established tracks and flowline easements. Areas of vegetation disturbance not required for future were prepared for rehabilitation. ACV 167 states "Ensure that the clearing footprint is maintained to within the spatial limits of the well pad area" but does not require the delineation of approved flowline area prior to clear and grade (pegging). There is no reconciliation of the proposed area of clearing (E02) with the reported area (E01).	Potentially non- compliant.
CEMP 24	 Management targets / Threshold Criteria No clearing or disturbance to fauna habitat outside of approved clearing areas during construction. Management action All clearing shall be managed through an internal Native Vegetation Clearance Procedure (E-PRO-002): Authorisation to Clear Vegetation (ACV) or an equivalent process. Delineation of approved area prior to clear and grade (pegging). The identification of potential conservation significant fauna species Clearing will be undertaken in stages (to allow for progressive movement of fauna outside of disturbance area) Clearing will be conducted in a manner that does not entrap fauna. 	A HSE System Audit will be undertaken against the Native Vegetation Clearing Procedure (E-PRO- 002)/or equivalent Proposal procedures to assess implementation and effectiveness.	Once during the construction phase, whilst vegetation clearing activities are occurring.	E05_TGS Expansion Wells and Flowlines Construction System Audit	The HSE System Audit was not undertaken whilst vegetation clearing activities are occurring.	Potentially non- compliant.



Commitment	Requirement	Measurement Criteria	Timing	Evidence	Assessment	Status
CEMP 25	 Management targets / Threshold Criteria No injuries or deaths of fauna outside of approved construction areas. Management action All personnel shall abide by the requirements of the Fauna Interaction Procedure (E-PRO-004) or equivalent procedure including: planned interactions in consultation with trained and licensed personnel; all fauna handling to be conducted by a licensed fauna handler; fauna interaction controls (minimise handling, release ASAP to safe location, report all handling events); speed limits (80km/h unsealed roads); reduce speeds / minimise travel in dawn and dusk periods; vehicles to remain on existing tracks; inspection of habitat trees prior to felling; recording of all fauna interactions including location data and date; and capturing all fauna interactions (injury, relocation or fatality) data. 	 Any fauna interactions, including all fauna removals, deaths or injuries shall be recorded with any fatalities entered into the INX InControl system. The following details will be recorded: Date/Time and Location Type and number of fauna Status (e.g., Dead/Alive/Injured) Method of removal Location of removal Details of person (Name, Contact Registration/Licence details). 	After each fauna interaction	C06_E-AUD-119 TGS Flowlines EP Draft Audit	 There were no reported non-compliances with the Fauna Interaction Procedure: Speed limits (80km/h unsealed roads, 60km/h on well site access roads, 40 km/h along the pipeline easement and 5km/h on site roads with facilities); Travel on existing access tracks only; Minimise travel at dusk and dawn; Recording of all fauna interactions including location data and date. 	Compliant
CEMP 26	 Management targets / Threshold Criteria No injuries or deaths of fauna outside of approved construction areas. Management action All personnel shall abide by the requirements of the Fauna Interaction Procedure (E-PRO-004) or equivalent procedure including: planned interactions in consultation with trained and licensed personnel; all fauna handling to be conducted by a licensed fauna handler; fauna interaction controls (minimise handling, release ASAP to safe location, report all handling events); speed limits (80km/h unsealed roads); reduce speeds / minimise travel in dawn and dusk periods; vehicles to remain on existing tracks; inspection of habitat trees prior to felling; recording of all fauna interactions including location data and date; and capturing all fauna interactions (injury, relocation or fatality) data. 	Project environmental inspections will be undertaken against a pre-determined checklist to review environmental management of key risk areas including fauna inspections and egress controls.	Weekly during the construction phase	E21_Weekly HSE Inspection - PC TRW8-6 Coaters 17-03-24 E30_Frazier, Nick - Fauna Handler 21112023 E31_Harbron, Richard - Venomous Snake Handler 240523	 Weekly HSE Inspection (E21) verifies: Vehicles and pedestrians stick to existing tracks (4.02). Fauna interactions all recorded including location data, date, injury or fatality (4.20). Fauna inspections carried out twice daily (sunrise and sunset) for all open excavations, trenches and drilling sump and records in place (4.21). Installation of fauna egress points (such as geotextile matting) installed on open excavations and drilling sump (4.22). Training records verify that relevant personnel were qualified in Fauna Handling (E30, E31). 	Compliant



Commitment	Requirement	Measurement Criteria	Timing	Evidence	Assessment
CEMP 27	 Management targets / Threshold Criteria No injuries or deaths of fauna outside of approved construction areas. Management action Any open trench (outside of a fenced facility) shall require at a minimum the: Completion of twice daily trench inspections, one within 3 hours of sunrise and one within 3 hours of work completion; Daily inspection of bellholes within 3 hours of sunrise; Installation of fauna egress from excavations or trenches (i.e. exit ramps every 500m of trench at a minimum and each excavation); Inspection of pipework for fauna prior to welding, including use of caps for pipe sections; Installation of fauna shelters every 100m if trench is >500m in length; Fauna ramps to be placed at both ends of trenches (intervals not to exceed 500 m). 	Inspections of any open trenches will be undertaken against a pre-determined inspection form, to confirm no fauna species are present within any trench prior to the start of each work shift. Records shall include the time of inspection, date, any interactions including species, status of fauna and location and relocation site information (i.e. GPS location)	Daily (prior to start of workshift) during construction trenching activities and towards end of day.	C06_E-AUD-119 TGS Flowlines EP Draft Audit E21_Weekly HSE Inspection - PC TRW8-6 Coaters 17-03-24 E33_J3816 - Fauna Inspection Register	Weekly HSE inspection (E21) out twice daily (sunrise and so trenches and drilling sump an Trench inspection register pro
CEMP 28	 Management targets / Threshold Criteria No injuries or deaths of fauna outside of approved construction areas. Management action Any open trench (outside of a fenced facility) shall require at a minimum the: Completion of twice daily trench inspections, one within 3 hours of sunrise and one within 3 hours of work completion; Daily inspection of bellholes within 3 hours of sunrise; Installation of fauna egress from excavations or trenches (i.e. exit ramps every 500m of trench at a minimum and each excavation); Inspection of pipework for fauna prior to welding, including use of caps for pipe sections; Installation of fauna shelters every 100m if trench is >500m in length; Fauna ramps to be placed at both ends of trenches (intervals not to exceed 500 m). 	Inspections of any open trenches will be undertaken against a pre-determined inspection form, to confirm no fauna species are present within any trench prior to the start of each work shift. Records shall include the time of inspection, date, any interactions including species, status of fauna and location and relocation site information (i.e. GPS location)	Personnel shall conduct an inspection prior to any backfilling or lowering in to confirm the absence of fauna. If fauna is present, the trained fauna handler shall be utilised to relocate.	E33_J3816 - Fauna Inspection Register	The fauna interaction and ins twice daily trench inspections and within 3 hours of work co



	Status
	Compliant
on (E21) confirms fauna inspections carried rise and sunset) for all open excavations, g sump and records in place (4.21). register provided.	
n and inspection register (E33) records the spections conducted within 3 hours of sunrise	Compliant
, f work completion.	

Commitment	Requirement	Measurement Criteria	Timing	Evidence	Assessment	Status
CEMP 29	 Management targets / Threshold Criteria No disturbance or destruction of known and unknown Aboriginal sites. Management action The Project induction will address Aboriginal heritage elements and be provided to all AGIT personnel. All clearing shall be managed through an internal Native Vegetation Clearance Procedure (E-PRO- 002): Authorisation to Clear Vegetation (ACV). Access track routes and well site and camp site locations will be selected to reduce requirement for clearing of conservation significant flora to ALARP including utilising existing cleared roads/tracks or well sites, where available. Delineation of approved area prior to clear and grade (pegging). Vegetation clearing to be undertaken in adherence to the ten clearing principles. Vehicle movements to be limited to established tracks. Areas of vegetation disturbance not required for future operational use shall be rehabilitated in accordance with the RMP. if a previously unidentified cultural heritage site is uncovered then a 30m buffer must be established around the new site within which work must cease. 	A review of all vegetation clearing shall be undertaken to ensure compliance to regulatory approval conditions. This will be completed via a Vegetation Clearing Review.	Annually	E03_ACV0167_TGS Expansion Flowlines E01_E-REG-001-2 Vegetation Clearing Register E02_Cleared Areas	 Assessment shows that: Clearing was managed through the internal Native Vegetation Clearance Procedure ACV 167 (E03). Existing access tracks and camp sites were utilised where possible. Vehicle movements were limited to established tracks and flowline easements. Areas of vegetation disturbance not required for future were prepared for rehabilitation. ACV 167 states "Ensure that the clearing footprint is maintained to within the spatial limits of the well pad area" but does not require the delineation of approved flowline area prior to clear and grade (pegging). There is no reconciliation of the proposed area of clearing (E02) with the reported area (E01). 	Potentially non- compliant.



Commitment	Requirement	Measurement Criteria	Timing	Evidence	Assessment	Status
CEMP 30	 Management targets / Threshold Criteria No disturbance or destruction of known and unknown Aboriginal sites. Management action The Project induction will address Aboriginal heritage elements and be provided to all AGIT personnel. All clearing shall be managed through an internal Native Vegetation Clearance Procedure (E-PRO- 002): Authorisation to Clear Vegetation (ACV). Access track routes and well site and camp site locations will be selected to reduce requirement for clearing of conservation significant flora to ALARP including utilising existing cleared roads/tracks or well sites, where available. Delineation of approved area prior to clear and grade (pegging). Vegetation clearing to be undertaken in adherence to the ten clearing principles. Vehicle movements to be limited to established tracks. Areas of vegetation disturbance not required for future operational use shall be rehabilitated in accordance with the RMP. if a previously unidentified cultural heritage site is uncovered then a 30m buffer must be established around the new site within which work must cease. 	A HSE System Audit will be undertaken against the Native Vegetation Clearing Procedure (E-PRO- 002)/or equivalent Proposal procedures to assess implementation and effectiveness (including avoidance of known aboriginal heritage sites).	Once during the construction phase, whilst vegetation clearing activities are occurring.	E05_TGS Expansion Wells and Flowlines Construction System Audit E12_TGS Flowline Site Specific Induction E03_ACV0167_TGS Expansion Flowlines E01_E-REG-001-2 Vegetation Clearing Register E02_Cleared Areas	 The HSE System Audit was not undertaken whilst vegetation clearing activities are occurring. Assessment shows that: The Project induction addresses Aboriginal heritage elements (E12) The induction records that if a previously unidentified cultural heritage site is uncovered then work must cease. Clearing was managed through the internal Native Vegetation Clearance Procedure ACV 167 (E03). Existing access tracks and camp sites were utilised where possible. Vehicle movements were limited to established tracks and flowline easements. Areas of vegetation disturbance not required for future were prepared for rehabilitation. Note: ACV 167 states "Ensure that the clearing footprint is maintained to within the spatial limits of the well pad area" but does not require the delineation of approved flowline area prior to clear and grade (pegging). 	Compliant



Commitment	Requirement	Measurement Criteria	Timing	Evidence	Assessment	Status
CEMP 31	 Management targets / Threshold Criteria No disturbance or destruction of known and unknown Aboriginal sites. Management action The Project induction will address Aboriginal heritage elements and be provided to all AGIT personnel. All clearing shall be managed through an internal Native Vegetation Clearance Procedure (E-PRO- 002): Authorisation to Clear Vegetation (ACV). Access track routes and well site and camp site locations will be selected to reduce requirement for clearing of conservation significant flora to ALARP including utilising existing cleared roads/tracks or well sites, where available. Delineation of approved area prior to clear and grade (pegging). Vegetation clearing to be undertaken in adherence to the ten clearing principles. Vehicle movements to be limited to established tracks. Areas of vegetation disturbance not required for future operational use shall be rehabilitated in accordance with the RMP. if a previously unidentified cultural heritage site is uncovered then a 30m buffer must be established around the new site within which work must cease. 	Project environmental inspections will be undertaken against a pre-determined checklist to review environmental management of key risk areas including inspections of controls relating to Aboriginal heritage sites.	Weekly during construction activities	E21_Weekly HSE Inspection - PC TRW8-6 Coaters 17-03-24 E12_TGS Flowline Site Specific Induction E03_ACV0167_TGS Expansion Flowlines C06_E-AUD-119 TGS Flowlines EP Draft Audit E27_DBP-S-REG-054 Project Corrective Action Register Rev0 - TGS Expansion Project - 28.03.2024	The weekly HSE inspection (E21) verifies that all heritage locations have been delineated as per CHMP (1.07). Slides 6, 7 & 8 of the induction address project address Aboriginal heritage elements. Clearing was managed under ACV 167 (E03). No unidentified cultural heritage sites were reported (C06).	Compliant
CEMP 32	 Management targets / Threshold Criteria Maintain regular communication between AGIT and landholder (Urala Station) representatives. Management action Landholder notifications will be completed for specific activities. For example, notification to pastoral stations of aerial surveillance activities. Signage will be placed around the boundary of the construction areas. Landholders will be communicated with at least annually and complaints responded to within 14 days. 	Any queries or complaints received, shall be recorded within the AGIT internal Land Management System (LMS).	 Landholder shall be communicated with at least annually. Any queries and/or complaints shall be responded to within 14 days. 	R06_TGSP Flowlines EP_Rev 7 E08_TGS Communication Log July 2023 to 17 Oct 2024	Communication with Mindaroo Station prior to project 16/03/2023 is documented in the EP (R06). No consultation on the flowline project during construction is documented in the Stakeholder Communication Register (E08). Annual review of the register confirms that Mindaroo have been contacted twice in the reporting period and that there were no complaints received.	Compliant



Commitment	Requirement	Measurement Criteria	Timing	Evidence	Assessment	Status
CEMP 33	 Management targets / Threshold Criteria No continuous visible dust plumes extending off the construction area footprint. Management action Reduced speed limited on unsealed roads and right of way. Minimise time between clear and grade (stripping) and backfill / reinstatement. Method Statements and Job Hazard Analysis to identify dust risk at time of activity and apply controls (i.e. water cart/ truck) Minimise grit blasting through other techniques (wire brush) where possible. Install enclosures and containment of overspray particles The application of water or stabilisers via water trucks and sprayers to dampen down soil. No runoff should be generated from application. Applications shall be frequent enough to provide persistent dust suppression Ensure vehicles with dust emitting loads are covered (except when loading and unloading) Potential use of dust stabilisers, water, tarps or geo- textile materials to suppress dust generated from temporary stockpiles. 	Project environmental inspections will be undertaken against a pre-determined checklist to review environmental management of key risk areas including emissions especially dust management and noise controls.	Weekly during construction activities	E21_Weekly HSE Inspection - PC TRW8-6 Coaters 17-03-24 E27_DBP-S-REG-054 Project Corrective Action Register Rev0 - TGS Expansion Project - 28.03.2024	 The weekly HSE inspection (E21) confirms that: Dust suppression is used (4.04) SWMS / JHA controls implemented and effective (2.07) Vehicles and pedestrians stick to existing tracks (4.02) Topsoil stockpiles don't exceed 2 m in height (4.03) Corrective action register (E27) raises 14 dust related actions. 	Compliant



Commitment	Requirement	Measurement Criteria	Timing	Evidence	Assessment
CEMP 34	 Management targets / Threshold Criteria No substantiated complaints received from landowners relating to dust or noise impacts. Management action Reduced speed limited on unsealed roads and right of way. Minimise time between clear and grade (stripping) and backfill / reinstatement. Method Statements and Job Hazard Analysis to identify dust risk at time of activity and apply controls (i.e. water cart/ truck) Minimise grit blasting through other techniques (wire brush) where possible. Install enclosures and containment of overspray particles The application of water or stabilisers via water trucks and sprayers to dampen down soil. No runoff should be generated from application. Applications shall be frequent enough to provide persistent dust suppression Ensure vehicles with dust emitting loads are covered (except when loading and unloading) Potential use of dust stabilisers, water, tarps or geo- textile materials to suppress dust generated from temporary stockpiles. Regularly maintained and muffled equipment and machinery. Compliance with Statutory requirements. Reduce pressure to as low as possible prior to venting, to minimise noise. 	Any queries or complaints received, shall be recorded within the AGIT internal Land Management System (LMS).	 Landholder shall be communicated with at least annually. Any queries and/or complaints shall be responded to within 14 days. 	E08_TGS Communication Log July 2023 to 17 Oct 2024	There were no dust or noise co
CEMP 35	 Management targets / Threshold Criteria All GHG emission targets relating to the TGSP are met, as outlined within the GHG Management Plan. Management action Flaring, if required during well construction, will be undertaken using a closed loop flare system which is a fully contained method of flaring any excess gas and any liquids released during well control situations. Flaring will be minimised to use during emergency situations only. Regular maintenance of vehicles and equipment, to ensure operation at maximum efficiency. Respond in a timely manner to all gas leaks and uncontrolled emissions Complete all regulatory reporting in relation to GHG emissions 	Continuous automated monitoring of air emissions arising from the TGSP shall be undertaken. GHG Management Plan (submitted to DWER)	Annually	M02_MS112_MS1209 CAR Evidence Request Response Rev 2	No GHG Management Plan pro advise that a GHG Managemen to EPA relinquishing Greenhou TGSP E&Ds reports were provi



	Status
	Not applicable
complaints in the reporting period.	
provided to the auditor. However AGIG	Compliant
ment Plan was provided to DWER prior house Gas Assessment.	
ovided quarterly to DEMIRS.	

Commitment	Requirement	Measurement Criteria	Timing	Evidence	Assessment	Status
CEMP 36	 Management targets / Threshold Criteria No significant hydrocarbon, chemical or sewage spills to surface water (ie. ephemeral drainage lines or lying water) (>200L) during construction activities. Management action Septic waste will be managed and monitored in accordance with the Waste Management Procedure (E-PRO-015). Wastewater management including biocycle septic and system maintenance and evaporation pond leak detection and inspections. 	Project environmental inspections will be undertaken against a pre-determined checklist to review environmental management of key risk areas including hydrocarbon, sewage and chemical handling and storage areas.	Weekly during construction activities	E21_Weekly HSE Inspection - PC TRW8-6 Coaters 17-03-24 C06_E-AUD-119 TGS Flowlines EP Draft Audit E27_DBP-S-REG-054 Project Corrective Action Register Rev0 - TGS Expansion Project - 28.03.2024	The weekly HSE Inspection (E21) confirms there are no spills of Septic waste from ablutions block (4.23). No spills of sewage were reported in the reporting period (C06).	Compliant
CEMP 37	 Management targets / Threshold Criteria No significant hydrocarbon, chemical or sewage spills to surface water (ie. ephemeral drainage lines or lying water) (>200L) during construction activities. 	 Any spills of hydrocarbons, sewage or chemicals shall be entered into INX InControl (the AGIT internal Event Management System). The following details will be recorded: Date/Time and Location. Type of spill and volume. Response measures implemented. 	Within 24hrs of any spill event occurring during construction	C06_E-AUD-119 TGS Flowlines EP Draft Audit E32_INX 19504 Investigation Report Diesel Spill TGS March 2024	There was one unplanned discharge, 200L diesel spill (E32), reported during the reporting period. This did not trigger the threshold criteria. Immediate actions undertaken were recorded, the incident was investigated and further corrective actions are being tracked through to completion.	Compliant
CEMP 38	 Management targets / Threshold Criteria No significant hydrocarbon, chemical or sewage spills to surface water (ie. ephemeral drainage lines or lying water) (>200L) during construction activities. Management action All chemicals used shall be transported, stored and handled and disposed of in accordance with the requirements of the relevant legislation and industry standards and S-PRO-016 Hazardous Materials Storage and Handling Procedure. This includes: MSDS's and Chemical register available onsite. Spill kits in heavy vehicles and at all storage locations. Use of drip trays during refuelling / vacuum removal from tanks. Bunding/self-containment of fixed plant and equipment (i.e. Generators). All liquid chemical waste disposal includes bunding during storage. ChemAlert subscription including risk assessment, max storage volumes and approval process 	A HSE System Audit will be undertaken against the Waste Management Procedure and Hazardous Materials Storage and Handling Procedure to assess implementation and effectiveness.	Once during the construction phase	E21_Weekly HSE Inspection - PC TRW8-6 Coaters 17-03-24 E05_TGS Expansion Wells and Flowlines Construction System Audit E27_DBP-S-REG-054 Project Corrective Action Register Rev0 - TGS Expansion Project - 28.03.2024	 Weekly HSE Inspections verify: The availability of a current SDS to personnel (4.15) That the project has an up-to-date chemical site register available (4.11). Use of drip trays under refuelling points (4.08); Secondary containment (Chemicals, fixed plant and chemicals) is in place (4.13); All liquid chemical waste disposal includes bunding during storage (4.19). The pre-construction audit (E05) confirms: SDS are located on site (ENV-0027) The chemical register is available onsite (ENV-0028) Bunding/self-containment of fixed plant and equipment (i.e. Generators) (ENV-0032) All liquid chemical waste disposal includes bunding during storage (ENV-0038). Preconstruction audit identified corrective action on use of drip trays which was completed by 31/12/2023. 	Compliant



Commitment	Requirement	Measurement Criteria	Timing	Evidence	Assessment	Status
CEMP 39	 Management targets / Threshold Criteria No significant hydrocarbon, chemical or sewage spills to surface water (ie. ephemeral drainage lines or lying water) (>200L) during construction activities. Management action Refuelling process: all mobile refuelling will be undertaken within the access track, well site or campsite cleared area (away from environmentally sensitive areas). use of drip trays under refuelling points. fuel transfer operations to be attended at all times. No hazardous materials handling will be undertaken within 100 m of a watercourse (i.e. refuelling, decanting). 	A HSE System Audit will be undertaken against the Waste Management Procedure and Hazardous Materials Storage and Handling Procedure to assess implementation and effectiveness.	Once during the construction phase	E21_Weekly HSE Inspection - PC TRW8-6 Coaters 17-03-24 E05_TGS Expansion Wells and Flowlines Construction System Audit E27_DBP-S-REG-054 Project Corrective Action Register Rev0 - TGS Expansion Project - 28.03.2024	 Weekly HSE Inspections (E21) verify: All mobile refuelling is undertaken within the access track or flowlines (4.02) Use of drip trays under refuelling points (4.08); Fuel transfer operations are always attended (4.09); No hazardous materials handling will be undertaken within 100 m of a watercourse (i.e. refuelling, decanting) except for <20L water abstraction pump inside a bunded area (4.07) Preconstruction audit (E05) identified corrective action on use of drip trays which was completed by 31/12/2023. 	Compliant
CEMP 40	 Management targets / Threshold Criteria No significant hydrocarbon, chemical or sewage spills to surface water (ie. ephemeral drainage lines or lying water) (>200L) during construction activities. Management action E-PRO-015 Water Management Procedure sets out the controls for waste onsite and the disposal process including the: Licensing of waste contractor Segregation of waste streams including hydrocarbon waster and batteries Collection of all pigging waste in sealed containers Bunding or containment of liquid wastes. 	A HSE System Audit will be undertaken against the Waste Management Procedure and Hazardous Materials Storage and Handling Procedure to assess implementation and effectiveness.	Once during the construction phase	E21_Weekly HSE Inspection - PC TRW8-6 Coaters 17-03-24 E14_Remondis TGS FY2024 Report E05_TGS Expansion Wells and Flowlines Construction System Audit C06_E-AUD-119 TGS Flowlines EP Draft Audit E27_DBP-S-REG-054 Project Corrective Action Register Rev0 - TGS Expansion Project - 28.03.2024	 Weekly inspection confirms: Segregation of waste streams including hydrocarbon waste and batteries (4.16); Bunding or containment of liquid wastes (4.19) Waste records (E14) show that waste is removed by a licenced contractor. The pre-construction audit (E05) confirms: Licensing of waste contractor (ENV-0037) Bunding or containment of liquid wastes. AGIG report (C06) confirms that there were no spills of waste in the reporting period. 	Compliant
CEMP 41	 Management targets / Threshold Criteria Procedures will be implemented to ensure existing natural surface water flows are maintained. Management action Water Management The TGSP is designed to capture all stormwater for controlled release (via infiltration basin). New access tracks and wells will be situated and designed to minimise impacts to local water flows and prevent water pooling. Suitable siting of soil and vegetation stockpiles to not hinder water flows. erosion controls are installed to prevent sedimentation into waterways. Management of Erosion Risk Areas procedure. Native Vegetation Clearance Procedure (ACV process). 	A HSE System Audit will be undertaken against the audit requirements including inspection and review of erosion controls and management of stormwater.	Once during the construction phase	E07_20240326 TGS Flowlines Project - HSE Field Audit (INX-19577)	HSE Field Audit confirmed no evidence of erosion or uncontrolled water discharge (5.1).	Compliant



Commitment	Requirement	Measurement Criteria	Timing	Evidence	Assessment	Status
CEMP 42	 Management targets / Threshold Criteria Procedures will be implemented to ensure existing natural surface water flows are maintained. Management action Water Management The TGSP is designed to capture all stormwater for controlled release (via infiltration basin). New access tracks and wells will be situated and designed to minimise impacts to local water flows and prevent water pooling. Suitable siting of soil and vegetation stockpiles to not hinder water flows. erosion controls are installed to prevent sedimentation into waterways. Management of Erosion Risk Areas procedure. Native Vegetation Clearance Procedure (ACV process). 	Monitoring of erosion controls via the use of aerial surveillance as documented in Aerial Surveillance Reports.	Monthly	C09_EXTERNAL_ MS112_MS1209 Aerial Surveillance	There is no evidence that aerial surveillance monitoring of the installed flowlines is being undertaken.	Potentially non-compliant
CEMP 43	 Management targets / Threshold Criteria Annual water license abstraction conditions are 100% compliant. Management action Water flow monitoring installed on all active bores or pumps or measured through water tanker use. Compliance to water abstraction license requirements including volume. Maintenance of plant and equipment to eliminate leaks or repair once identified. 	Tracking of abstracted water volumes shall be undertaken via flowmeters on abstraction bores or pumps or if not available via truck volume readings.	Quarterly (Water Online)	E29_E-REG-013-0 Water Licence Register	No groundwater was abstracted for the flowline project in the reporting period (E29).	Not applicable
CEMP 44	 The CEMP / Operations Environment Plan review shall: assess the appropriateness of the EP to the operations of facilities based on audit information; and determine if any changes to the EP are required as a result of operational, legislative or organisational changes. All revisions shall be submitted to DMIRS for approval. 	CEMP and Operations Environment Plans are reviewed every 5 years and submitted to DEMIRS	Minimum of every five years or earlier if in response to a material change to the activities and/or the use of equipment or in response to actions arising from any audit taken.	R06_TGSP Flowlines EP_Rev 7	The CEMP was replaced by the DEMIRS Flowlines EP (R06) originally submitted to DEMIRS 03/05/2023 (Rev 1) revised Rev 2 to Rev 6 and approved by DEMIRS 02/02/2024 (Rev 7). The TGSP Operations EP is under assessment with DEMIRS having been revised from the approved July 2022 version (Rev 3).	Compliant
CEMP 45	As per Section 7.3, DBP undertakes a targeted annual review to ensure a process to identify trends, key factors and areas of focus for upcoming awareness programs and evaluations. This allows DBP to assess the potential risk from both events as well as audit and evaluation findings to target areas of concern or ongoing opportunities for improvement.	A targeted annual review of trends, key factors and areas of focus for upcoming awareness programs and evaluations is undertaken annually.	Annually	C06_E-AUD-119 TGS Flowlines EP Draft Audit	The draft assessment (C06) provided identifies opportunities for improvement.	Compliant



Commitment	Requirement	Measurement Criteria	Timing	Evidence	Assessment	Status
CEMP 46	 AGIT is committed to ongoing consultation with all stakeholders that may be impacted during the construction phase: Department of Water and Environmental Regulation Department of Mines, Industry Regulation and Safety (DMIRS) Shire of Ashburton Native Title Claimant group Thalanyji (BTAC) Leaseholders for Minderoo Station – Crown Lease 56/1967 	AGIT are undertaking ongoing consultation with impacted stakeholders.	During construction	R06_TGSP Flowlines EP_Rev 7 E08_TGS Communication Log July 2023 to 17 Oct 2024 C11_Ongoing Consultation Reporting Year	Notice of decision on the Flowlines EP (R06) indicates consultation with DEMIRS in the reporting period. Stakeholder consultation register (E08) indicates no flowline related correspondence in the reporting period. Email from AGIG (C11) recorded construction related consultation with the Shire of Ashburton (camp, road closures and conditions, waste disposal), Minderoo Station (access agreement), Traditional Owners (monitoring and CHMP) and DEMIRS.	Compliant

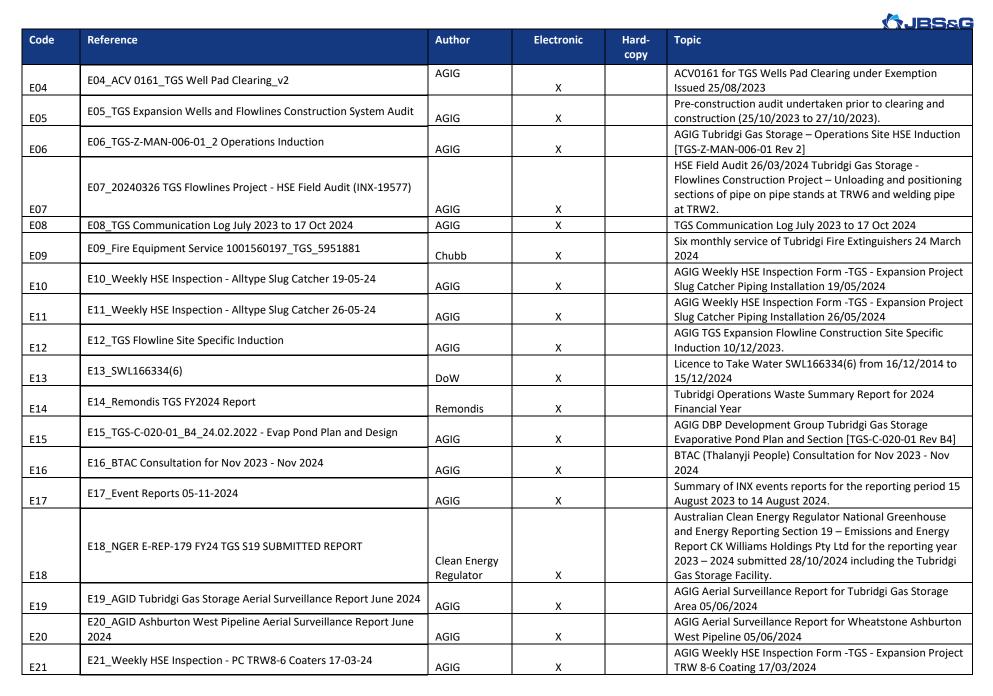




Appendix I Evidence Register

Table I.6: Evidence Register

Code	Reference	Author	Electronic	Hard- copy	Торіс
004	C01_E-COR-0298 Letter to DWER Ministerial statement 1209 amendments to CHMP				Letter dated 04/09/2024 from AGIG submitting the updated CHMP to DWER in response to the request for
C01 C02	C02_MS112_MS1209 CAR Evidence Request	AGIG	x		amendments from DWER. Advice 24/09/2024 from AGIG to JBS&G that the CHMP is currently under assessment and review by DWER.
C02	C03_E-COR-0300 APP025468 Statement1209 EPA to AGIG Letter Att1 -CHMP Update table	DWER	x		DWER CHMP comments sheet dated 30/07/2024.
C04	C04 EXTERNAL RE AGI Tubridgi s45C application (MS112)	AGIG	X		AGI Tubridgi s45C application (MS112)
C05	C05_E-AUD-120 TGS OEP Draft Audit Finding	AGIG	x		TGS Flowlines EP Audit Report 30/10/2024 [E-AUD-120 Rev 0] InControl Ref #20229: To audit compliance of ongoing operational activities against the DEMIRS approved TGS OEP Rev 3 (E-PLN-023).
C06	C06_E-AUD-119 TGS Flowlines EP Audit	AGIG	x		TGS Flowlines EP Audit Report 30/10/2024 [E-AUD-119 Rev 0] InControl Ref #20228: To audit compliance of flowline constructions activities against the DEMIRS approved TGS Flowlines EP Rev 7 (E-PLN-043).
C07	C07_EXTERNAL_ MS112_MS1209 CAR Evidence Request	AGIG	x		AGIG response 14/11/2024 to JBS&G request for information on Minister's satisfaction of rehabilitation plan and environmental management and monitoring programmes.
C08	C08_MS112 Condition Environment Plan submission – Tubridgi	AGIG	X		AGIG submission email 21/11/2022 of the flowlines environmental management and monitoring programme (CEMP).
C09	C09_EXTERNAL_MS112_MS1209 Aerial Surveillance	AGIG	x		AGIG email notification 14/11/2024 to JBS&G that aerial surveillance does not capture flowlines.
C10	C10_TGSP Flowlines EP_Rev 7 Approval	DEMIRS	x		Approval letter dated 02/02/2024 for Tubridgi Gas Storage Project – Flowlines Environment Plan (E-PLN-043, Rev 7)
C11	C11_Ongoing Consultation Reporting Year	AGIG	x		Email 21/11/2024 from AGIG to JBS&G outlining consultation in the reporting period.
E01	E01_E-REG-001-2 Vegetation Clearing Register	DBP	x		DBP Vegetation Clearing Register (E-REG-001 Rev 0 08/07/2013)
E02	E02_Cleared Areas	JBS&G	x		Calculations of areas proposed to be cleared under ACV 161 and ACV 167.
E03	E03_ACV0167_TGS Expansion Flowlines	AGIG	x		ACV0167 for TGS Expansion Flowlines under MS 112 Issued 21/11/2023



Code	Reference	Author	Electronic	Hard- copy	Торіс
E22	E22_Spill Drill June 2023	DBP	х		Spill Drill Evaluation 09/06/2024 TGS Flammable Goods Sea Container [E-FRM-015.1]
E23	E23_ATU Service Report 28 February 2024	Coral Coast Plumbing	x		Inspection Report for Tubridgi Operations Camp ATU service conducted 28/02/2024
E24	E24_Cleanaway Controlled Waste Docket WO15587504 16.05.24	Cleanaway	x		Cleanaway waste receipts, DWER controlled waste tracking forms and waste accepatance receipt for 6.8 t of emulsion (J100).
E25	E25_DBP-S-FRM-054.1 Rev8 HSE Field Audit SMP	DBP	Х		DBP HSE Field Audit (11/08/2024) TGS SMP Slugcatcher
E26	E26_Enviromentalinspection 20241012	DBP	x		DBP Site Inspection Facilities TGS 12/10/2024 [S-FRM-505- 8] including stocktake of spill kits.
E27	E27_DBP-S-REG-054 Project Corrective Action Register Rev0 - TGS Expansion Project - 28.03.2024	AGIG	x		AGIG Project Corrective Action Register DBP-S-REG-009.1 Rev 0 17/11/2022.
E28	E28_Weed Management WO 1001630251	AGIG	x		AGIG Maximo Workorder 1001630251 Tubridgi Gas Plant Weed Control
E29	E29_E-REG-013-0 Water Licence Register	AGIG	Х		AGIG Water Licence Register [E-REG-013]
E30	E30_Frazier, Nick - Fauna Handler 21112023	AnimalArk	x		Certificate confirming Nick Frazier has successfully completed the AnimalArk Fauna Handling Course 21/11/2023.
E31	E31_Harbron, Richard - Venomous Snake Handler 240523	AnimalArk	x		Certificate confirming Richard Habron has successfully completed the AnimalArk Venomous Snake Handling & Relocation Course 24/05/2023.
E32	E32_INX 19504 Investigation Report Diesel Spill TGS March 2024	DBP	x		DBP ICAM Investigation Report – 04/03/2024 Diesel Spill TGS Drill Camp [DBP-S-INV-62 Version: B 28/03/2024]
E33	E33_J3816 - Fauna Inspection Register	Pipecraft	x		Pipecraft Fauna Interaction and Inspection Register [HSEFM-000-31 Rev 0]
E34	E34_TGS Construction Daily Report #259 10-02-2024	AGIG	x		AGIG TGS Expansion Project Construction Daily Report 10/02/2024
E35	E35_TGS Construction Daily Report #309 19-04-2024	AGIG	x		AGIG TGS Expansion Project Construction Daily Report 19/04/2024
M01	M01_MS112_MS1209 CAR Evidence Request Response Rev 1	AGIG	x		AGIG response to JBS&G request for evidence to collate this compliance assessment report.
M02	M02_MS112_MS1209 CAR Evidence Request Response Rev 2	AGIG	x		AGIG response to JBS&G follow up request for evidence to collate this compliance assessment report.
R01	R01_MS112_MS1209 CAR 2024	JBS&G	Х		This compliance assessment report.
R02	R02_MS112_MS1209 CAR 2023	JBS&G	x		Australian Gas Infrastructure Group Tubridgi Gas Reservoir 2023 Compliance Assessment Report – Ministerial Statement 112 JBS&G [65375 10 January 2024]



Code	Reference	Author	Electronic	Hard- copy	Topic
R03	R03_DBP2302_Tubridgi_Rehabilitation Report 2023	Mattiske	X		Rehabilitation Assessment of the Tubridgi Flowlines and TSG2 Well. Prepared By Mattiske Consulting Pty Ltd for Australian Gas Infrastructure Group (V2 19/12/2023).
R04	R04_EPA Report 1743 - Tubridgi Gas Field - s.46 inquiry	EPA	x		Report 1743 June 2023 Tubridgi Gas Field Development, near Onslow – inquiry under Section 46 of the <i>Environmental Protection Act 1986</i> to amend Ministerial Statement 112.
R05	R05_E-PLN-023 TGSP Operations EP Rev3	AGIG	x		Tubridgi Gas Storage Project Operations Environment Plan [E-PLN-023 Rev 3]
R06	R06_TGSP Flowlines EP_Rev 7	AGIG	x		Tubridgi Gas Storage Project - Flowlines Environment Plan [E-PLN-043 Rev 7]
R07	R07_Rpt00-AU01967-NIA- AGIG TGS Noise Study	Wood	x		DBP Tubridgi Gas Storage Plant Noise Study [Rpt00- AU01967 Rev 0] 05-10-2023
R08	R08_C02_E-COR-0299 CHMP TGS Project EPA Comments Updated August 2024 Draft for BTAC consideration	AGIG	x		Tubridgi Gas Field Development (Near Onslow) Project Cultural Heritage Management Plan Rev 1
R09	R09_2023 Q3 TGS Quarterly Emissions	AGIG	x		AGI Tubridgi Pty Ltd Tubridgi Gas Storage Emissions and Discharges for Quarter 3 2023 under Tubridgi Gas Storage Project Operations Environment Plan – Revision 1.1, October 2018
R10	R10_2023 Q4 TGS Quarterly Emissions	AGIG	x		AGI Tubridgi Pty Ltd Tubridgi Gas Storage Emissions and Discharges for Quarter 4 2023 under Tubridgi Gas Storage Project Operations Environment Plan – Revision 1.1, October 2018
R11	R11_2024 Q1 TGS Quarterly Emissions	AGIG	x		AGI Tubridgi Pty Ltd Tubridgi Gas Storage Emissions and Discharges for Quarter 1 2024 under Tubridgi Gas Storage Project Operations Environment Plan – Revision 1.1, October 2018
R12	R12_2024 Q2 TGS Quarterly Emissions	AGIG	x		AGI Tubridgi Pty Ltd Tubridgi Gas Storage Emissions and Discharges for Quarter 2 2024 under Tubridgi Gas Storage Project Operations Environment Plan – Revision 1.1, October 2018
R13	R13_67055 R01 MS1209 Tubridgi CAP Rev 1	JBS&G	x		AGI Development Group Nominees Pty Ltd Development and Operation of the Tubridgi Gas Field, Ministerial Statement Nos. 112 & 1209 Compliance Assessment Plan Prepared by JBS&G [67055 13 May 2024]
R14	R14_E-PLN-023 TGSP Operations EP Rev5	AGIG	x		Tubridgi Gas Storage Project Operational Environmental Plan [E-PLN-023 Rev 5] 18/10/2024
R15	R15_Flowline Rehabilitation Plan Addendum	AGIG	x		Tubridgi Gas Storage Project Operational Environment Plan Addendum (Tubridgi Gas Storage Project – Flowlines (E- PLN-043)) Rev 0 18/10/2024



Code	Reference	Author	Electronic	Hard-	Торіс
				сору	
	R16_TGS DWER CEMP_Rev 1				Tubridgi Gas Storage Project Wells, Flowlines and Facilities Construction Environmental Management Plan [E-PLN-042
R16		AGIG	Х		Revision 1] November 2022
	R17_E-STU-078 Tubridgi Rehabilitation Report and Appendices 2024				Rehabilitation Assessment of the Tubridgi Flowlines and TSG2 Well Prepared by Mattiske Consulting Pty Ltd for
R17		Mattiske	Х		Australian Gas Infrastructure Group [V2 07/10/2024]



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