



ENVIRONMENTAL COMPLIANCE REPORT

EPBC 2013/7047- SURAT BASIN DEVELOPMENT PROJECT (“Surat North Project”)

The Surat Basin Development Project (Surat North Project), which authorises the development of approximately 400 CSG production wells and associated infrastructure within the Project area was approved by the Department of Environment and Energy (DoEE), on 17 December 2014.

Under EPBC approval 2013/7047 (**the Approval**), the holder of the approval is required to publish a Compliance Report addressing compliance with the below conditions on its website within three months of every anniversary of the commencement of the action.

This document is QGC’s Compliance Report for referral approval EPBC 2013/7047 – Surat Basin Development for the period from 20 October 2018 to 19 October 2019 (**the Reporting Period**).

Condition 34 of the approval requires that the following information be included in the Compliance Report:

- (a) a reconciliation of actual impacts against whole of project maximum disturbance limits for EPBC Act listed threatened species and communities listed in Table 1;
- (b) the number and spatial distribution of boreholes where hydraulic fracturing is expected to occur and, detailed separately, has occurred; and
- (c) details of constituent components of hydraulic fracturing agents used and any other reinjected fluid(s), their toxicity as individual substances and as total effluent toxicity and ecotoxicity.

This report complies with these requirements.

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1.0 BACKGROUND

1.1 The Surat Basin Development Project

The Surat Basin Development Project (Surat North Project) involves development of new coal seam gas (CSG) fields in Queensland's northern Surat Basin. The Project area lies approximately 20km west of Wandoan, 35km south-west of Taroom, and 16 km north of Woleebee.

The infrastructure project involves:

- ▶ Coal seam gas production wells with associated infrastructure including gas and water gathering lines;
- ▶ Up to three field compression stations, where gas is received and compressed for transfer through trunklines to the existing and previously approved Woleebee Creek Central Processing Plant;
- ▶ Regional storage ponds and in-field water storage, including ponds, tanks and pumping stations for transfer through trunklines to the existing and previously approved Woleebee Creek Water Treatment Plant;
- ▶ Trunklines for transportation of gas and water within the referral area; and
- ▶ Ancillary and support infrastructure including access roads, electrical supply infrastructure, communications, laydown areas, borrow pits and temporary camps.

1.2 Project Activities during the reporting Period

QGC is currently approaching completion of the first phase of development within the Project Area. Operational activities currently conducted include wells operations, gathering lines and trunklines for gas and water, a field compression station, in-field water storage and supporting infrastructure.

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2.0 CONCLUSION

In compiling this Compliance Report, QGC has not identified any new instances of non-compliance with the conditions of EPBC approval 2013/7047. **Appendix A** of this report provides details of compliance with each of the approval conditions for the reporting period.



Surat Basin Project Area – EPBC 2013/7047 – Assessment of Compliance with Conditions



Condition		Statement of Compliance	Status																
Conditions of Approval																			
1.	The Minister may determine that a plan, strategy or program approved by the Queensland Government satisfies a plan, strategy or program required under these conditions.	QGC is not aware of any decision of the Minister regarding this matter.	Compliant																
Project Area																			
2.	For the purpose of the action, the approval holder must not take any action outside the project area.	The project area is confined to the area identified at Attachment A of the approval.	Compliant																
Disturbance Limits																			
3	The action is limited to a maximum of 400 coal seam gas production wells and associated infrastructure.	This condition was revoked on 11 July 2018.	Archived																
4.	<p>The approval holder must not exceed the maximum disturbance limits in Table 1.</p> <p>Table 1- Whole of project maximum disturbance limits</p> <table border="1" data-bbox="280 874 1075 1437"> <thead> <tr> <th data-bbox="280 874 683 975">Threatened Fauna Species</th> <th data-bbox="683 874 1075 975">Maximum disturbance (hectares) to core habitat known and core habitat potential</th> </tr> </thead> <tbody> <tr> <td data-bbox="280 975 683 1042">South-eastern long-eared Bat (<i>Nyctophilus corbeni</i>)</td> <td data-bbox="683 975 1075 1042">105.9</td> </tr> <tr> <td data-bbox="280 1042 683 1206">Koala (<i>Phascolarctos cinereus</i>) (combined populations of Queensland, New South Wales and the Australian Capital Territory)</td> <td data-bbox="683 1042 1075 1206">71.7</td> </tr> <tr> <td data-bbox="280 1206 683 1241">Yakka Skink (<i>Egernia rugosa</i>)</td> <td data-bbox="683 1206 1075 1241">59.3</td> </tr> <tr> <th data-bbox="280 1241 683 1276">Threatened Flora Species</th> <th data-bbox="683 1241 1075 1276">Maximum disturbance (hectares)</th> </tr> <tr> <td data-bbox="280 1276 683 1343">Belson’s Panic Grass (<i>Homopholis belsonii</i>)</td> <td data-bbox="683 1276 1075 1343">47.5</td> </tr> <tr> <td data-bbox="280 1343 683 1378">Ooline (<i>Cadellia pentastylis</i>)</td> <td data-bbox="683 1343 1075 1378">4</td> </tr> <tr> <th data-bbox="280 1378 683 1437">Threatened Ecological Communities</th> <th data-bbox="683 1378 1075 1437">Maximum disturbance (hectares)</th> </tr> </tbody> </table>	Threatened Fauna Species	Maximum disturbance (hectares) to core habitat known and core habitat potential	South-eastern long-eared Bat (<i>Nyctophilus corbeni</i>)	105.9	Koala (<i>Phascolarctos cinereus</i>) (combined populations of Queensland, New South Wales and the Australian Capital Territory)	71.7	Yakka Skink (<i>Egernia rugosa</i>)	59.3	Threatened Flora Species	Maximum disturbance (hectares)	Belson’s Panic Grass (<i>Homopholis belsonii</i>)	47.5	Ooline (<i>Cadellia pentastylis</i>)	4	Threatened Ecological Communities	Maximum disturbance (hectares)	<p>Limits have not been exceeded. No disturbance to MNES has been recorded during the reporting period.</p> <p>See reconciliation of actual impacts against the maximum disturbance limits for EPBC Act listed threatened species and communities listed in Table 1.</p>	Compliant
Threatened Fauna Species	Maximum disturbance (hectares) to core habitat known and core habitat potential																		
South-eastern long-eared Bat (<i>Nyctophilus corbeni</i>)	105.9																		
Koala (<i>Phascolarctos cinereus</i>) (combined populations of Queensland, New South Wales and the Australian Capital Territory)	71.7																		
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Belson’s Panic Grass (<i>Homopholis belsonii</i>)	47.5																		
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Threatened Ecological Communities	Maximum disturbance (hectares)																		



	Brigalow (Acacia harpophyl/a dominant and co-dominant)	15		
	Semi-evergreen vine thickets of the Brigalow Belt (North and South) and Nandewar Bioregions	4		
	Coolibah- Block Box Woodlands of the Darling Riverine Plains and the Brigalow Belt South Bioregions	2		
Pre-clearance surveys				
5.	The approval holder must undertake pre-clearance surveys of proposed disturbance areas.		Pre-clearance surveys have been undertaken.	Compliant
6.	Pre-clearance surveys must be supervised by a suitably qualified person and undertaken in accordance with the Department’s survey guidelines in effect at the time of the survey or other survey methodology endorsed by the Department in writing.		Pre-clearance surveys undertaken within the project area are supervised by suitably qualified person and in accordance with the applicable methodology.	Compliant
7.	All pre-clearance survey reports must be published on the approval holder’s website within one month of completion and at least 20 business days prior to the clearing of vegetation which is the subject of a pre-clearance survey, and remain published on the website for the life of the project.		Applicable pre-clearance surveys are published on QGC’s website. Please refer to http://www.shell.com.au/about-us/projects-and-locations/qgc/environment/environment-management/pre-clearance-surveys.html	Compliant
Matters of National Environmental Significance Impact Management Plans				
8.	The approval holder must manage impacts to EPBC Act listed threatened species and communities that are known or likely to occur in the project area in accordance with the Significant Species Management Plans (SSMP).		SSMP (QCQGC-BX00-ENV-PLN-000010) has been implemented.	Compliant
9.	Where EPBC Act listed threatened species or EPBC Act listed ecological communities which do not have a SSMP are identified in the development area, the approval holder		No additional EPBC Act listed threatened species or EPBC Act listed ecological communities have been	Not activated



	will develop a SSMP and submit within 3 months of identifying these MNES, a copy of the SSMP to the Minister for written approval.	identified within the project area during the reporting period.	
10.	The approval holder must manage impacts to EPBC Act listed threatened species and communities from pest and weed species in accordance with the Pest and Weed Management Plan.	QGC’s Biosecurity Manual, which replaced the Pest and Weed Management Plan, was approved by the Department on 15 May 2018 and has been implemented. QGC manages impacts from pest and weed species in accordance with this plan.	Compliant
11.	The approval holder must implement the Remediation, Rehabilitation and Recovery Monitoring Plan.	The Remediation, Rehabilitation and Recovery Monitoring Plan (QCQGC-BX00-ENV-PLN-000015) has been implemented. QGC submitted its Reinstatement and Rehabilitation Manual (QCQGC-BX00-ENV-MAN-000005) for DoEE approval on 15 May 2019 to supersede the Remediation, Rehabilitation and Recovery Monitoring Plan. The Department approved the Manual on 9 January 2020.	Compliant
12.	The approval holder must implement the Constraints Planning and Field Development Protocol.	The approved Constraints Planning and Field Development Protocol (QCQGC-BX00-ENV-PCE-000001) has been implemented.	Compliant
Revised MNES Impact Management Plans			



13.	<p>The approval holder must submit, within 14 months of commencement, Revised MNES Impact Management Plans for the written approval of the Minister. The Revised MNES Impact Management Plans must include:</p> <p>(a) the results of pre-clearance surveys for all areas proposed to be impacted, subject to the approval holder being granted appropriate land access to undertake the surveys;</p> <p>(b) any changes in whole of project maximum disturbance limits in Table 1 as a result of these pre-clearance survey results; and</p> <p>(c) revisions of the Pest and Weed Management Plan, Remediation, Rehabilitation and Recovery Monitoring Plan and the Constraints Planning and Field Development Protocol and any other plans altered to take account of new information.</p>	<p>QGC advised the Department on 22 December 2016 that there were no changes in the predictions of impacts to MNES as a result of commencing the project and pre-clearance surveys undertaken. Hence, there was no requirement to update the MNES Impact Management Plans and any associated plans to account for any new information within 14 months of the commencement.</p>	Compliant
14.	<p>The approval holder must implement the approved Revised MNES Impact Management Plans.</p> <p>Note 1: Where Land access is not granted, in sufficient time for pre-clearance surveys to inform the Revised MNES Impact Management Plans required within 14 months of commencement, the approval holder may use an alternate methodology such as Geographic Information System analysis of satellite imagery to assess potentially impacted areas for the purposes of these plans.</p>	See condition 13.	Not triggered
15.	<p>The approval holder must review the approved Revised MNES Impact Management Plans at least once each five years. If the MNES Impact Management Plans require updating to reflect any new information, including from pre-clearance surveys or management practice, the approval holder must submit the updated plan(s) to the Minister within two months of revision, requesting written approval.</p>	<p>Since the commencement of the activities within this area, the following plans have been reviewed and updated:</p> <ul style="list-style-type: none">• Constraints Planning and Field Development Protocol (QCQGC-BX00-ENV-PCE-000001) approved by the Department on 4 January 2017.	Compliant



		<ul style="list-style-type: none"> • Biosecurity Manual (QCQGC-BX00-ENV-MAN-000002) (which replaced the Pest and Weed Management Plan) approved by the Department on 15 May 2018 • Reinstatement and Rehabilitation Manual (QCQGC-BX00-ENV-MAN-000005) which replaced the RRRMP, submitted to Department on 15 May 2019, approved 9 January 2020 • Significant Species Management Plan (QCQGC-BX00-ENV-PLN-000010) revised December 2019 and submitted to Department 19 December 2019 	
Offsets			
16.	The approval holder must ensure that the environmental offsets comply with the principles of the EPBC Act Environmental Offsets Policy.	QGC’s environmental offsets comply with the principles of the EPBC Act Environmental Offsets Policy.	Compliant
17.	To compensate for authorised unavoidable significant residual impacts on Matters of National Environmental Significance, the approval holder must, within 14 months of commencement, prepare and submit an Offset Management Plan to the Minister for written approval.	The Offset Area Management Plan and Surat Basin Acreage Development, Commonwealth Offset Verification Report Property H-Valkyrie were initially submitted to the Minister on 2 December 2016. The Offset Management Plan was approved on 15 August 2017.	Compliant



		The Plan is currently being implemented.	
18.	<p>The Offset Management Plan must include:</p> <p>(a) details of the offset site(s) proposed for the residual Significant impacts for each maximum disturbance limit in Table 1, including, for each proposed offset site, the location, tenure, site description, map of environmental values and shapefiles;</p> <p>(b) the locations of EPBC listed threatened species habitat and communities in the proposed offset areas, including maps in electronic Geographic Information System (GIS) format;</p> <p>(c) detailed description of the quality, condition, site context and environmental values of the offset site(s) and include details of connectivity of the offset area with relevant habitats and biodiversity corridors outside the proposed offset areas;</p> <p>(d) details of the management measures that will be implemented for the protection of EPBC Act listed threatened species and EPBC Act listed ecological communities, including a table setting out how the measures proposed have regard to, and are consistent with, the measures in relevant conservation advice, recovery plans and threat abatement plans;</p> <p>(e) details of how offset sites have been, or will be, legally secured and the proposed legal mechanism(s) for securing the offset within the required timeframe specified at Condition 20;</p> <p>(f) a monitoring program for the proposed offset site(s) suitable to measure the success of the management measures against stated performance criteria including monitoring locations, parameters and timing;</p>	<p>The Offset Area Management Plan and Surat Basin Acreage Development, Commonwealth Offset Verification Report Property H-Valkyrie were initially submitted to the Minister on 2 December 2016.</p> <p>The Offset Management Plan was approved on 15 August 2017.</p> <p>The Plan is currently being implemented.</p>	Compliant



	<p>(g) a description of the potential risks to the successful implementation of the Offset Management Plan, and details of contingency measures that will be implemented to mitigate these risks; and</p> <p>(h) a detailed proposal to offset any significant residual impacts on any EPBC Act listed threatened species and EPBC Act listed ecological communities not identified in Table 1.</p>		
19.	<p>The approval holder must not convey outside the project area gas derived from the action unless the Minister has approved the Offset Management Plan. The approval holder must implement the approved Offset Management Plan.</p>	<p>Gas started being conveyed outside the project area following the approval of the Offset Management Plan.</p> <p>The current OAMP has been implemented.</p>	<p>Compliant</p>



20.	<p>The approval holder must legally secure the offset areas proposed in the Offset Management Plan approved by the Minister within 36 months of commencement.</p>	<p>QGC and the previous landholder signed a heads of agreement (HoA) including clauses to protect the habitat intended for offsets on 25th March 2015.</p> <p>Subsequent to the HoA QGC purchased the Valkyrie property in early 2016 as freehold land for the purpose of establishing biodiversity offsets.</p> <p>The Valkyrie Offset Area Management Plant (OAMP) including provision for Surat Basin Acreage Development (SBAD) (EPBC 2013/4047) offsets was approved by DOEE on 15 August 2017.</p> <p>A voluntary declaration on 3 KL162 - Isaac Regional Council was certified by the Queensland Department of Natural Resources and Mines (DNRM) on 2 September 2019.</p>	Completed
21.	<p>The approval holder must, within 50 months of commencement, submit a Revised Offset Management Plan to the Minister for written approval. The Revised Offset Management Plan must constitute a revision of the approved Offset Management Plan, taking account of all new information including the results of all pre-clearance surveys. If the residual impact of the project on any MNES is greater than that predicted in the approved Offset Management Plan, the approval holder must propose in the Revised Offset Management Plan an offset or offsets for the additional residual impact. The approval holder must implement the approved Revised Offset Management Plan.</p>	<p>Noted. This condition was not activated during the reporting period.</p>	



22.	<p>The approval holder must legally secure the offset areas proposed in the Revised Offset Management Plan approved by the Minister within 12 months from the date of the Minister’s approval of this plan.</p> <p>Note 2: Offsets for some species may be accommodated within ecological communities of overlap State approval requirements or other species habitat requirements, as long as they meet the requirements of these conditions of approval in respect of each individual species and community being offset.</p> <p>Note 3: The Minister may determine that offsets approved by the Queensland Government may satisfy the requirements for offsetting EPBC ACT MNES so long as any required offsets comply with the principles of the EPBC Act Environmental Offsets Policy or an equivalent Queensland Government offsets policy that ensures the maintenance and protection of MNES,</p>	Noted. This condition has not yet been activated.	Not triggered
Water management and monitoring			
23.	<p>The approval holder must submit a Coal Seam Gas Water Monitoring and Management Plan (CSG WMMP) at least two months prior to the extraction of water or coal seam gas, for the written approval of the Minister who may seek the advice of an expert panel. The CSG WMMP must contain:</p> <p>(a) parameters and a sampling regime to establish baseline data for surface and groundwater resources that may be impacted by the action, including: surface water quality and quantity in the project area, and upstream and downstream of potential impact areas; groundwater quality, levels and pressures for each formation that may</p>	<p>The CSG WWMP was submitted to the Department on 13 July 2016.</p> <p>The plan was approved on 13 December 2016 and has been implemented.</p> <p>The 2019 monitoring report required under item (e) has been published on QGC website.</p> <p>Annual Report 2018- Water Management Plans</p>	Compliant



<p>be impacted by the project and for determining connectivity between different formations and between surface water and groundwater that may be impacted by the project;</p> <p>(b) provide for the early detection of any changes in groundwater quality, levels of pressure in each hydrogeological unit and changes to connectivity between formations or surface/groundwater connectivity;</p> <p>(c) monitor relevant formations to determine any changes to hydraulic connectivity and provide for early detection of impacts;</p> <p>(d) an assessment of potential impacts from the action on non-spring based groundwater dependent ecosystems through potential changes to surface-groundwater connectivity and interactions with the sub-surface expression of groundwater, including in areas adjacent to the Dawson River;</p> <p>(e) a program to monitor subsidence impacts from the action, including trigger thresholds and reporting of monitoring results in annual reporting required by Condition 34;</p> <p>(f) provisions to make monitoring results publicly available within 6 months of their collection, and retained on the approval holder’s website for the life of the project, to facilitate a greater understanding of cumulative impacts;</p> <p>(g) a discussion on how the approval holder is contributing to the Joint Industry Plan, including its periodic review. The approval holder must contribute to the Joint Industry Plan and comply with any part of the Joint Industry Plan, or future iterations of the Joint Industry Plan, that applies to the approval holder;</p>	<p>f) Monitoring results are published on the Shell Australia website;</p> <p>g) The JIP revision is currently being assessed by the Department;</p> <p>h) Early warning triggers have been developed and are part of the relevant Exceedance Response Plans. Revised triggers are being developed for the GDE management Plan due in Q1 2020;</p> <p>i) The monitoring network is operating</p> <p>j) Exceedance response Plans are operating</p> <p>k) Data is available and provided on request</p>	
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<p>(h) early warning indicators, trigger thresholds and their reference values derived from baseline data for each monitoring point, including investigation and/or mitigation activities for both early warning indicators and trigger thresholds:</p> <p>(i.) for aquatic ecology and aquatic ecosystems; and</p> <p>(ii.) for groundwater, including groundwater drawdown limits for all aquifers potentially impacted by the action.</p> <p>(i) details of ongoing monitoring measures that:</p> <p>(i.) sets out the frequency of monitoring and rationale for the frequency; (ii.) includes continued collection of data for each monitoring site over the life of the project;</p> <p>(iii.) outlines the approach to be taken to analyse the results including the methods to determine trends to indicate potential impacts and describes the data and evidentiary standards to derive baseline conditions, reference values, triggers, thresholds and limits, and that data and evidentiary standards be included in regular reporting against the approval conditions; and</p> <p>(iv.) builds on the groundwater early warning system required at Condition h and sets out early warning indicators and trigger thresholds and limits for groundwater and surface water.</p> <p>(j) a risk based exceedance response plan that details the actions the approval holder will take and the timeframes in which those actions will be undertaken if, early warning indicators and trigger threshold values contained in the CSG WMMP are exceeded, or there are any emergency discharges; and</p> <p>(k) provisions to make monitoring data available to the Department and Queensland Government authorities (if requested) for inclusion in any cumulative impact</p>		
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	assessment, regional water balance model, bioregional assessment or relevant research.		
24.	The CSG WMMP may refer to relevant sections of the QGC Stage 3 Water Monitoring and Management Plan approved in accordance with EPBC Approval 2008/4398, provided that the above information required in Condition 23 has been met. To avoid doubt, if a condition of another approval, held by the approval holder, requires a Water Monitoring and Management Plan, the approval holder may submit a single document which satisfies the requirements of each approval.	The technical work covered in the QGC Stage 3 WMMP was designed and implemented to also cover the Surat Basin development. When applicable, relevant sections of that plan are referred in the CSG WMMP approved on 13 December 2016.	Compliant
25.	The approval holder must revise the CSG WMMP at least every three years including by incorporating changes to measures, parameters and actions reflecting the results of updated OGIA modelling and revisions to the Underground Water Impact Report. Updated modelling results must reflect actual measurements and monitoring data associated with this action. The revisions of the CSG WMMP may be submitted in accordance with the timing required for the Stage 3 Water Monitoring and Management Plan required under EPBC Approval 2008/4398, unless otherwise determined by the Minister.	With the approved CSG WMMP, QGC committed to align the revision of the WMMP to occur on a three yearly cycle and six months following the publication of the Underground Water Impact Report (UWIR) by OGIA. OGIA's UWIR was activated on 16th December 2019, accordingly, QGC will review of the CSG WMMP will occur by 16th June 2020.	Compliant
26.	Any revisions to the CSG WMMP must be peer reviewed by a suitably qualified water resources expert/s approved by the Minister in writing. A peer review must be submitted to the Minister together with the CSG WMMP and a statement from the suitably qualified water resources expert/s stating that they carried out the peer review and endorse the findings and the content of the CSG WMMP	The CSG WMMP was peer reviewed. Any updates will also be reviewed.	Compliant



27.	<p>The approval holder must not commence the extraction of water or coal seam gas until the CSG WMMP has been approved by the Minister in writing. The approved CSG WMMP must be implemented by the approval holder.</p> <p>Note 4: To ensure efficiency the approval holder may prepare and align the CSG WMNP with the requirements of the Queensland Government, as long as the relevant matters under the conditions of this approval are clearly and adequately addressed.</p> <p>Note 5: The Minister may throughout the life of the project life seek advice from experts, or an expert panel. As a consequence, specific matters identified through such advice may need to be addressed on the CSG WMMP. Where such advice is sought the approval holder will be provided with opportunity to submit information and respond to the specific matters identified, in order to ensure the CSG WMMP is based on the best available information. Review requirements will facilitate adaptive management, align with Queensland Government approval requirements, and account for potential accumulative impacts as new scientific information becomes available over the life of the project.</p>	Extraction of water or coal seam gas did not start prior to the plan approval.	Compliant
Well Construction and Operation			
28.	<p>The approval holder must ensure that gas wells are constructed, operated and decommissioned in accordance with best practice principles in the Queensland Code of Practice for Construction and Abandoning CSG wells.</p>	QGC meets the principles and means of compliance or have an approved alternate means of compliance as described in the Code of Practice.	Compliant



29.	The Minister may direct in writing that the approval holder cease water or gas extraction and/or water discharge or use if an early warning indicator, trigger threshold or limit is exceeded, and if the Minister is not satisfied that the action proposed or taken by the approval holder will remedy the situation. The Minister may direct the approval holder to implement alternative action at the expense of the approval holder.	No direction has been received from the Minister during the reporting period.	Not triggered
30.	If the Minister has directed in writing that the approval holder must cease water or gas extraction and/or water discharge or use pursuant to Condition 29, the approval holder must not recommence such activities until the Minister has given approval in writing for the recommencement of those activities. Approval to recommence activities may be subject to conditions that the Minister considers reasonable.	No direction has been received from the Minister during the reporting period.	Not triggered
31.	If the OGIA model ceases to exist, then the approval holder must submit an alternate model to be used for the purpose of these conditions that replaces the OGIA model as referred to in these conditions. The alternate model must be approved by the Minister in writing.	The OGIA model is activated.	Not triggered
General			
32.	Within 20 business days after the commencement of the action, the approval holder must advise the Department in writing of the actual date of commencement.	Commencement of the action in the project area occurred on 20 October 2015. The Department was notified in writing on 17 November 2015.	Compliant



33.	<p>The approval holder must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the management plans, reports or strategies required by this approval, and make them available upon request to the Department. The annual report (Condition 34) must state all confirmed cases of non-compliance along with details of any remedial actions. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the Department’s website. The results of audits may also be publicised through the general media.</p>	<p>Accurate records, including measures taken to implement approved reports or strategies required under this approval are kept at QGC’s head office.</p> <p>No non- compliances with the conditions of this approval have been identified during the reporting period.</p>	Compliant
34.	<p>Within three months of every 12 month anniversary of the commencement of the action, the approval holder must publish a report on its website for the life of the approval outlining how they have been compliant with the conditions of this approval over the previous 12 months, including the implementation of any management plans, strategies or programs as specified in the conditions. The approval holder must also provide in this report:</p> <p>(a) a reconciliation of actual impacts against whole of project maximum disturbance limits for EPBC Act listed threatened species and communities listed in Table 1;</p> <p>(b) the number and spatial distribution of boreholes where hydraulic fracturing is expected to occur and, detailed separately, has occurred; and</p> <p>(c) details of constituent components of hydraulic fracturing agents used and any other reinjected fluid(s), their toxicity as individual substances and as total effluent toxicity and ecotoxicity.</p>	<p>This demonstrates compliance with this condition.</p> <p>(a) No impact to MNES has been recorded during the reporting period. A reconciliation of actual impacts against whole of project maximum disturbance limits for EPBC Act listed threatened species and communities listed in Table 1 is presented as appendix B;</p> <p>(b) Not applicable- QGC currently has no well stimulations planned for 2020 within the wells covered by this approval.</p> <p>(c) Not applicable- No hydraulic fracturing has occurred within the wells covered by this approval to</p>	Compliant



	Note 6: For the purpose of publication of information required under condition 34c, the approval holder may, with the written approval of the Minister, redact any information that is subject to confidentiality restrictions imposed on the approval holder by a third party. However, the approval holder must provide an unredacted version of the report to the Minister with the request regarding redaction.	date. QGC notes that all chemicals used by QGC on stimulation activities as well as its risk assessments are published on QGC's website.	
35.	The approval holder must provide to the Minister a copy of their 'Freshwater Ecotoxicity of Coal Seam Gas Stimulation Fluids' and Stimulation chemicals risk assessment reports.	The relevant documents were provided to the Minister on 10 November 2016. All Stimulation chemicals risk assessment reports are published on QGC's website. No stimulation has been conducted during the reporting period.	Compliant
36.	The approval holder must provide documentary evidence to the Department providing proof of the date of publication of the report required under Condition 34 at the same time as the report is published.	The Department will be provided with proof of the date of the publication at the same time as the report is published.	Compliant
37.	The approval holder must notify the Department in writing of potential non-compliance with any condition of this approval as soon as practical and in any event within two business days of becoming aware of the potential non-compliance. The notice provided to the Department under this condition must specify: (a) the condition which the approval holder has potentially breached; (b) the nature of the potential non-compliance; and	No notifications to the department were made during the reporting period.	Not triggered



	<p>(c) when and how the approval holder became aware of the potential noncompliance.</p> <p>Within no later than twenty business days of becoming aware of the potential noncompliance, the notice to the Department under this condition must also specify:</p> <p>(d) how the non-compliance will affect the anticipated impacts of the approved action, in particular how the non-compliance will affect the impacts on the matters of national environmental significance;</p> <p>(e) the measures the approval holder will take to address the impacts of the non-compliance on the matters of national environmental significance and rectify the non-compliance; and</p> <p>(f) the time by when the approval holder will rectify the non-compliance.</p>		
38.	<p>Upon the direction of the Minister, the approval holder must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister. The audit must not commence unless and until the Minister has approved the independent auditor and audit criteria. The audit report must address the criteria to the satisfaction of the Minister.</p>	<p>QGC has not been requested by the Minister to conduct an independent audit.</p>	<p>Not triggered</p>
39.	<p>If the approval holder wishes to carry out any activity other than in accordance with the management plans as specified in the conditions, the approval holder must submit to the Department for the Minister’s written approval a revised version of that management plan. The approval holder must not commence the varied activity until the Minister has approved the varied management plan. The Minister will not approve a varied management plan unless the revised management plan would result in an equivalent or improved environmental outcome over time. If the Minister approves the</p>	<p>QGC submitted Reinstatement and Rehabilitation Manual (QCQGC-BX00-ENV-MAN-000005) for DoEE approval on 15 May 2019 to supersede the Remediation, Rehabilitation and Recovery Monitoring Plan. Department approved Manual on 9 January 2020.</p> <p>QGC revised the Significant Species Management Plan (QCQGC-BX00-ENV-PLN-000010) in December</p>	<p>Compliant</p>



	revised management plan, that management plan must be implemented in place of the management plan originally approved.	2019 and submitted to Department 19 December 2019. In addition, QGC is currently planning a substantial review of the SSMP and will provide the updated version for approval once it is finalised.	
40.	If the Minister believes that it is necessary or convenient for the better protection of EPBC Act listed threatened species, listed migratory species or water resources to do so, the Minister may request that the approval holder make specified revisions to the management plans specified in the conditions and submit the revised management plan for the Minister’s written approval. The approval holder must comply with any such request within the timeframe specified by the Minister. The revised approved management plan must be implemented. Unless the Minister has approved the revised management plan, then the person taking the action must continue to implement the management plan originally approved, as specified in the conditions.	QGC has not received a request from the Minister to make specified revisions of the management plans during the reporting period	Not triggered
41.	If, at any time after five years from the date of this approval, the approval holder has not commenced the action, then the approval holder must not commence the action without the written agreement of the Minister.	The action commenced within 5 years of the approval date.	Compliant
42.	Unless otherwise agreed to in writing by the Minister, the approval holder must publish all management plans referred to in these conditions of approval on its website. Each management plan must be published on the website within 1 month of being approved by the Minister and remain available on that website for the life of the approval.	Approved plans are published at QGC’s website. Reinstatement and Rehabilitation Manual will be published by 9 February 2020.	Compliant



APPENDIX B – LISTED THREATENED SPECIES AND COMMUNITIES- RECONCILIATION

Threatened Fauna/Flora Species	Maximum disturbance (hectares) to core habitat known and core habitat potential	Actual/cumulative disturbance whole of project (hectares)
South-eastern long-eared Bat <i>(Nyctophilus corbeni)</i>	105.9	6.94
Koala (<i>Phascolarctos cinereus</i>) (combined populations of Queensland, New South Wales and the Australian Capital Territory)	71.7	3.98
Yakka Skink (<i>Egernia rugosa</i>)	59.3	5.3
Belson's Panic Grass <i>(Homopholis belsonii)</i>	47.5	0
Ooline (<i>Cadellia pentastylis</i>)	4	0
Threatened Ecological Communities	Maximum disturbance (hectares)	Actual and cumulative disturbance whole of project (hectares)
Brigalow (<i>Acacia harpophylla</i> dominant and co-dominant)	15	5.11
Semi-evergreen vine thickets of the Brigalow Belt (North and South) and Nandewar Bioregions	4	0
Coolibah- Block Box Woodlands of the Darling Riverine Plains and the Brigalow Belt South Bioregions	2	0



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