

Arrow Energy**Surat Gas Project EPBC Approval 2010/5344
Annual Compliance Report 2024/2025**

S00-ARW-ENV-REP-00119

Report

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Author		Position	Manager Environmental Compliance & Assurance

Current revision approval

	Name	Position	Signature	Date
Approver		Chief Operating Officer		

SECURITY CLASSIFICATION - 2 - Restricted**Controlled Document**

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1 Purpose

This report addresses compliance with the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) Approval 2010/5344 (EPBC Approval) for the annual period between 22 October 2024 to 21 October 2025.

2 Description of Activities

2.1 Approved Activities

EPBC Number:	2010/5344
Project Name:	Surat Gas Expansion Project (SGP), Surat Basin, Queensland, Australia
Approval Holder:	Arrow Energy Pty Ltd
ABN:	73 078 521 936
Approved Action:	To expand coal seam gas operations in the Surat Basin, Queensland, as described in the referral received under the EPBC Act on 2 February 2010; and as described in the Surat Gas Project Environmental Impact Statement (March 2012) and Supplementary Report to the Environmental Impact Statement (June 2013). [See EPBC Act referral 2010/5344].
Decision Date:	19 December 2013
Variation Date:	As relevant to this report: 29 March 2022, 27 February 2025, 9 June 2025, 10 November 2025, 15 January 2026
Action Commencement Date:	22 October 2020
Location of Project:	Surat Basin
Person Accepting responsibility for the report:	Anton Verdel Chief Operating Officer
Dates for Reporting period:	22 October 2024 to 21 October 2025
Date of Preparation of report:	21 May 2026

2.2 Current Activities

Disturbance activities associated with pipelines, gathering, tracks, wells, a field compression station, a water transfer station and road upgrades were undertaken by Arrow Energy Pty Ltd (Arrow) during the current reporting period for the following projects:

- Dalby Expansion Project (DXP)
 - Beneficial Use Network (BUN) South (PL198, PL260)
 - Grassdale Road Part 1 (PL198, PL260)
 - Kupunn Nandi Part 1 (PL260)
 - Kupunn Nandi Part 2 (PL198, PL260)
 - Nandi Springvale Part 2 (PL198, PL260)
 - Tipton 2023 (PL198)
- Kogan North
 - KNJV Initial Development (PL194, PPL2081)
 - KNJV North Joint Venture Pipeline (PPL2069)
- Surat Gas Project (North) (PL305, PL492)
 - Bellevue Part 1 (PL492)
 - Girraheeen Central (field compression station, water transfer station and access road) (PL305)
- Treated Water Return Pipeline (PPL2058 on tenure section overlapping PL194 and PL230)
- Girraheeen to Bellevue Pipeline (PPL2076 on tenure section overlapping PL492 and PL305)
- Road Scopes
 - Dalby Kogan Road (PL194)
 - Gearys Road (PL492)
 - Hennings Connection Road (PL198)

3 Approval Conditions

3.1 Compliance Table

EPBC approval conditions and an assessment of compliance against each condition is presented in Appendix A. The assessment demonstrates compliance with all conditions.

Records substantiating all activities associated with or relevant to EPBC Approval conditions are stored in Arrow's file directories.

3.2 Referenced Management Plans

The following management plans required under the EPBC Approval conditions are implemented and available on Arrow's website.

- Surat Gas Project Species Impact Management Plan, 2018 (SIMP)
- Surat Gas Project Stage 1 Offset Strategy, 2025 (Stage 1 Offset Strategy)
- Surat Gas Project Stage 2 Offset Strategy, 2025 (Stage 2 Offset Strategy)
- Surat Gas Project Stage 1 Offset Area Management Plan, 2025 (Stage 1 OAMP)
- Surat Gas Project Stage 1 CSG Water Monitoring and Management Plan, 2018 (Stage 1 CSG WMMP)
- Surat Gas Project Updated CSG Water Monitoring and Management Plan, 2019 (Updated CSG WMMP)

4 Non-compliances

- Nil

5 New environmental risks

- Nil

6 Report against disturbance limits

In accordance with Condition 28, Table 1 provides "*a report against disturbance limits*" as against the whole of project maximum disturbance limits in Condition 5 of the EPBC Approval, and the maximum disturbance limits for Stage 1 in Condition 6 of the EPBC Approval. For this annual return, all MNES disturbance calculations (see Table 1) for disturbance between 22 October 2020 and 21 October 2025 are based on 'as-disturbed' survey data. MNES disturbance calculations are based on spatial data extracted from the spatial repository on 21 May 2026.

Table 1 - Report against project maximum disturbance limits

	Whole of project approved limits (ha)	Stage 1 max disturbance limits	Cumulative impact total (ha)
Threatened Species			
Curly-bark Wattle, <i>Acacia curranii</i>	1,210		0
Hando's Wattle, <i>Acacia handonis</i>	1,210		0
Belson's Panic, <i>Homopholis belsonii</i>	140		0
<i>Prostanthera</i> sp Dunmore	380		0
Small-leaved Denhamia, <i>Denhamia parvifolia</i>	50		0
<i>Calytrix gurlmundensis</i>	1,210		0
Ooline, <i>Cadellia pentastylis</i>	No disturbance		0
Austral Toadflax, <i>Thesium australe</i>	160		0
<i>Acacia lauta</i>	990		0
<i>Xerothamnella herbacea</i>	110		0
Hawkweed, <i>Picris evae</i>	120		0
Austral Cornflower, <i>Rhaponticum australe</i>	160		0
<i>Eucalyptus virens</i>	170		0
King Blue-grass, <i>Dichanthium queenslandicum</i>	160		0
Queensland White-gum, <i>Eucalyptus argophloia</i>	10		0
<i>Macrozamia machinii</i>	No disturbance		0
South-eastern Long-eared Bat, <i>Nyctophilus corbeni</i>	4,080	485.52	274
Dunmall's Snake, <i>Furina dunmalli</i>	4,400	300	285
Five-clawed Worm-skink, <i>Anomalopus mackayi</i>	560	2	0
Squatter Pigeon (Southern), <i>Geophaps scripta scripta</i>	3,261	203	0
Regent Honeyeater, <i>Anthochaera phrygia</i>	20	1	0
Collared Delma, <i>Delma torquata</i>	90	11	0
Yakka Skink, <i>Egernia rugosa</i>	310	19	0

	Whole of project approved limits (ha)	Stage 1 max disturbance limits	Cumulative impact total (ha)
Threatened Species			
Australian Painted Snipe, <i>Rostratula australis</i>	5		0
Threatened Ecological Communities			
Brigalow (<i>Acacia harpophylla</i> dominant and co- dominant)	106	39	6
Coolibah - Black Box Woodlands of the Darling Riverine Plains and the Brigalow Belt South Bioregions	8	8	0
Weeping Myall Woodlands	1	0	0
Natural Grasslands of the Queensland Central Highlands and the northern Fitzroy Basin	No disturbance	0	0
White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland	No disturbance	0	0
Semi-evergreen vine thickets of the Brigalow Belt (North and South) and Nandewar Bioregions	No disturbance	0	0

7 Declaration of Accuracy

In making this declaration, I am aware that sections 490 and 491 of the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed : _____

Full name: Anton Verdel

Position: Chief Operating Officer

Organisation: Arrow Energy Pty Ltd

ABN: 73 078 521 936

Date: _____

Appendix A: EPBC Approval Conditions Compliance Table

Surat Gas Project EPBC Approval 2010/5344 Annual Compliance Report 2024/2025

Report

Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
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.	Full	Not applicable	There are no plans approved by the Queensland Government that are relevant to plans required under the conditions of the EPBC Approval.
2	For the purpose of the action, the approval holder must not take any action outside the project area.	Full	Compliant	All activities as described in Section 2.2 were undertaken within the project area for the purpose of the action.
3	The action is limited to a maximum of 6,500 coal seam gas production wells and associated infrastructure	Full	Compliant	The total number of production wells installed since the action commenced until the end of the annual reporting period is 335.
4	The approval holder must not undertake hydraulic fracturing.	Full	Compliant	Hydraulic fracturing was not undertaken during the reporting period.
5	To protect those EPBC listed species and communities within the project area the maximum disturbance limits in Table 1 apply to the project. The approval holder must not exceed these maximum disturbance limits.	Full	Compliant	Refer to Table 1 of this EPBC Approval Annual Compliance Report. Arrow has not exceeded these limits.
6	To protect EPBC listed species and communities within the project area the maximum disturbance limits in Table 2 apply to Stage 1. The approval holder must not exceed these disturbance limits.	Part 22 Oct 2024 - 26 Feb 2025	Compliant	Table 1 of this EPBC Approval Annual Compliance Report reconciles the planned impact of Project Stage 1 with the Project Stage 1 maximum disturbance limits as referenced in the approved SGP Stage 1 Offset Strategy. Arrow has not exceeded these limits.
6	To protect EPBC listed threatened species and communities within the project area the maximum disturbance limits in Table 2 apply to Stage 1. The approval holder must not exceed these disturbance limits.	Part 27 Feb 2025 - 21 Oct 2025	Compliant	Table 1 of this EPBC Approval Annual Compliance Report reconciles the planned impact of Project Stage 1 with the Project Stage 1 maximum disturbance limits as referenced in the approved SGP Stage 1 Offset Strategy. Arrow has not exceeded these limits.

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Report

Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
7A	Prior to the commencement of Stage 1, the approval holder must prepare and submit an EPBC Species Impact Management Plan for the Minister's written approval. The EPBC Species Impact Management Plan must include: a. measures that will be taken to avoid, mitigate and manage impacts to EPBC listed threatened species and their habitat during clearance of vegetation, including the involvement of a suitably qualified person at all times during clearance of vegetation; b. measures that will be taken to avoid, mitigate and manage impacts to EPBC listed threatened species and their habitat and to EPBC communities during construction, operation and decommissioning of the action; c. a monitoring program to determine the success of impacts avoidance and mitigation measures and that will inform adaptive implementation of the action to ensure adaptive management for the duration of this approval; and d. a description of how measures proposed in the EPBC Species Impact Management Plan are consistent with the measures in relevant conservation advice, recovery plans and threat abatement plans.	Full	Compliant	Arrow prepared and had approved by the minister, an EPBC Species Impact Management Plan (SIMP) which addressed each of the requirements in Condition 7A. The SIMP was approved on 14 December 2018, prior to the commencement of the SGP Project on 22 October 2020.

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Report

Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
7B	The approval holder must not commence Stage 1 until an EPBC Species Impact Management Plan has been approved by the Minister in writing. The approved EPBC Species Impact Management Plan must be implemented by the approval holder.	Full	Compliant	The SIMP was approved by the Minister in writing on 14 December 2018, which was prior to the commencement of the SGP Project on 22 October 2020. The approved SIMP is being implemented. Specific measures implemented from the SIMP include: • Arrow follows hierarchical management principles used to avoid, minimise and mitigate impacts to ecological values when positioning infrastructure. These principles are reflected in standard Arrow procedures. • Undertaking pre-clearance surveys of disturbance areas to identify any MNES values actually, or potentially, present. MNES habitats and TECs are delineated spatially prior to disturbance commencing. • No go areas are demarcated on-ground to prevent over-clearing. • Where impacts cannot be avoided, a qualified fauna spotter-catcher is present during clearing, with capture/release points captured as GPS coordinates. Records of these are maintained. • 'As-disturbed' survey data is provided by construction contractors permitting tracking of MNES disturbances against Table 1 of the approval. • Rehabilitation is undertaken of disturbed areas following completion of construction activities.
8A	If the approval holder has provided an offset in respect of impacts predicted for a development stage of the project which subsequently are not realised, such parts of the offset in excess of the obligation for that development stage can be applied towards offsets required for the impacts of subsequent development stages.	Part 22 Oct 2024 - 26 Feb 2025	Not applicable	This condition does not include a compliance requirement.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
8A	If the approval holder has provided an offset in respect of impacts to protected matters predicted for a development stage of the project which subsequently are not realised, such parts of the offset in excess of the obligation for that development stage can be applied towards offsets required for the impacts to protected matters of subsequent development stages.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	This condition does not include a compliance requirement.
8B	The Offset Strategy may be prepared and submitted to the Minister for approval in stages. Each stage of the Offset Strategy must provide information in respect of the subsequent development stage to commence and all earlier development stages. A development stage must not commence until an Offsets Strategy addressing offset obligations for that development stage has been approved by the Minister.	Full	Compliant	Arrow's Stage 1 Offset Strategy (28 June 2019) was approved by the Minister on 7 July 2019 prior to commencement of SGP Stage 1 development activities on 22 October 2020. It provided information in respect of securing offsets for Stage 1 activities. In February 2025 Arrow submitted a revised Stage 1 Offset Strategy that excluded offsets for MNES fauna species listed after the referral decision, removed the delisted Kogan Waxflower and addressed delays to the Stage 1 activities. The revised Stage 1 Offset Strategy (12 February 2025) was approved by the Department on 27 March 2025. The Department varied the conditions and definitions of the EPBC Approval on 27 February 2025. The Stage 1 definition was changed from 3 years from commencement of the action to installation of 350 gas wells and associated infrastructure. Arrow's Stage 2 Offset Strategy (30 April 2025) was approved by the Minister on 19 June 2025 prior to commencement of SGP Stage 2 development activities on 15 August 2025. It provides information in respect of securing offsets for Stage 2 activities including applying offsets secured for Stage 1 in excess of impacts incurred.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
8C a)	The Offset Strategy must: a. include a strategy to secure the offsets proposed for the residual significant impacts to the EPBC listed species and EPBC communities for the subsequent development Stage;	Full	Compliant	As described in the Stage 1 Offsets Strategy (Section 4) and Stage 2 Offsets Strategy (Section 4), Arrow will secure offsets proposed for the residual significant impacts to the EPBC listed species and EPBC communities through a combination of direct land-based offsets and indirect offsets (i.e. other compensatory measures) in accordance with the EPBC Act Offsets Policy.
8C b)	The Offset Strategy must: b. include a map of the location of each EPBC listed threatened species and its habitat and EPBC community in relation to infrastructure for the subsequent development stage;	Full	Compliant	Arrow has provided maps in Section 5 of the Stage 1 Offset Strategy and the Stage 2 Offset Strategy showing habitat for the EPBC listed threatened species and communities (as relevant) that were predicted to be impacted at the time each of the offset strategies were prepared based on an indicative location of the activities planned for each stage. It was noted in the Stage 1 Offset Strategy that the specific location of activities may change during the detailed design phase and Arrow shareholder and joint venture partner approval processes. The Stage 2 Offset Strategy noted that specific location of activities will depend on pre-clearance surveys, obligations in the SIMP and relevant approval conditions. However, the principles and strategies for securing offsets that are presented in both offset strategies will be implemented.
8C c)	The Offset Strategy must: c. describe the potential risks to the successful implementation of the Offset Strategy, and the contingency measures that would be implemented to mitigate against these risks;	Full	Compliant	The potential risks, existing controls, risk rating, monitoring and contingency measures are described in Table 6.1 of the Stage 1 Offsets Strategy and Table 6.1 of the Stage 2 Offsets Strategy, for Stages 1 and 2 respectively.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
8C d)	The Offset Strategy must: d. detail how the approval holder will address any residual significant impacts to any EPBC listed threatened species and its habitat and/or EPBC communities not identified in Table 1, in accordance with the EPBC Act Offsets Policy; and	Full	Compliant	No significant residual impacts to EPBC listed threatened species and its habitat and/or EPBC communities that were listed under the EPBC Act at the time of the EPBC Approval but not identified in Table 1 of the EPBC Approval have occurred. Section 7.2 of the Stage 1 Offset Strategy and Section 7 of the Stage 2 Offset Strategy describe the process that Arrow would follow should Arrow identify residual impacts to EPBC listed threatened species and their habitat and/or EPBC communities that were listed under the EPBC Act at the time of the EPBC Approval but not identified in Table 1 of the EPBC Approval. Arrow will offset residual significant impacts on these MNES values in accordance with the EPBC Act Offsets Policy. Direct land-based and indirect offsets would be provided and captured in the relevant OAMP.
8C e)	The Offset Strategy must: e. specify the proposed legal mechanism and timeframe for securing the offset(s).	Full	Compliant	Both the Stage 1 and Stage 2 Offset Strategies (Section 8) identified that the legal mechanism for securing the offsets for each stage would be via a Voluntary Declaration under the <i>Vegetation Management Act 1999</i> (Qld), with the offsets being legally secured prior to commencement of the subsequent stage. Arrow legally secured the Stage 1 offset via a Voluntary Declaration in accordance with the Stage 1 Offset Strategy prior to the commencement of Stage 2.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
8D	The approval holder must not commence the action until the Offset Strategy for Stage 1 has been approved by the Minister in writing. The approved Offset Strategy must be implemented by the approval holder.	Full	Compliant	Arrow submitted the Stage 1 Offset Strategy to the Minister which was approved on 7 July 2019. Stage 1 commenced on 22 October 2020, being after the Stage 1 Offset Strategy was approved. The approved Stage 1 Offset Strategy was implemented. Specific Offset Strategy measures that were implemented include: • pre-clearance surveys of disturbance areas to identify any MNES values actually, or potentially, present • tracking of disturbances to MNES values with the provision of 'as-disturbed' survey data provided by construction contractors • narrowing suitable properties for land-based offsets and engaging with relevant landholder for the identified property • executing a Call-option Agreement with a landholder to provide offsets for Stage 1 impacts to MNES listed in Table 2 of the EPBC Approval (dated 25 January 2023) • working with the Department for approval of the Stage 1 OAMP for the delivery of offsets • legally securing the Stage 1 offset via a Voluntary Declaration (2025/001723) as per the legal mechanism described in the Stage 1 Offset Strategy (executed on 5 August 2025)
9A	At least 3 months prior to the commencement of any development stage after Stage 1, the approval holder must submit a revised Offset Strategy for approval by the Minister.	Full	Compliant	On 30 April 2025, which was 3 months prior to Stage 2 commencing on 15 August 2025, Arrow submitted the Stage 2 Offset Strategy to the Department. It was approved by the Minister on 19 June 2025.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
9A a)	The updated Offset Strategy must include: a. a strategy to secure the minimum offsets proposed for the residual significant impacts to the EPBC listed species and communities for the subsequent development stage;	Full	Compliant	The Stage 2 Offset Strategy (Section 4) details Arrows strategy to secure the offsets proposed for the residual significant impacts to the EPBC listed threatened species and EPBC communities for Stage 2. Arrow will secure offsets through a combination of direct land-based offsets and indirect offsets (i.e. other compensatory measures) in accordance with the EPBC Act Offsets Policy.
9A b)	The updated Offset Strategy must include: b. a map of the location of each EPBC listed threatened species and its habitat and EPBC Community in relation to infrastructure for the subsequent development stage;	Full	Compliant	Maps have been provided in Section 5 of the Stage 2 Offset Strategy, to illustrate the location of each relevant MNES value in relation to the proposed Stage 2 activities.
9A c)	The updated Offset Strategy must include: c. the information required for the Offset Strategy Conditions 8Ca to 8Ce for the subsequent development stage;	Full	Compliant	The information required to be included in an Offset Strategy under conditions 8C(a) to 8C(e) is addressed in Section 4 to Section 8 of the Stage 2 Offset Strategy. Refer to the comments column of Condition 8C for further detail.
9A d)	The updated Offset Strategy must include: d. demonstration of how any proposed offset builds on offsets already secured and will contribute to a larger strategic offset for whole of project impacts;	Full	Compliant	Arrow aims to co-locate offsets for subsequent development stages where technically feasible, to improve the biodiversity value of each offset individually and strengthen other values such as connectivity and resilience. This is detailed in Section 14 of the Stage 2 Offset Strategy.
9A e)	The updated Offset Strategy must include: e. performance and completion criteria for evaluating the management of offset areas;	Full	Compliant	Section 15 of the Stage 2 Offset Strategy details development of interim performance criteria (with annual monitoring reporting for the offset site) to track implementation and success of site management actions towards final completion criteria. The interim criteria will be provided in the Stage 2 OAMP.
9A f)	The updated Offset Strategy must include: f. reconciliation of impacts predicted in the subsequent development stage and actual disturbance in preceding development stages against the maximum disturbance limits set out in Table 1.	Full	Compliant	A reconciliation of impacts predicted in the subsequent development stages and actual disturbance in Stage 1 against the maximum disturbance limits is provided in Section 16 of the Stage 2 Offset Strategy.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
10A	Offsets for development stages must be in accordance with the mechanism identified in the Offset Strategy and must be registered and legally secured in accordance with Queensland legislation prior to commencement of any subsequent development stage.	Full	Compliant	For Stage 1, Voluntary Declaration 2025/001723 was executed on 5 August 2025 declaring that the area, identified on Declared Area Map DAM 2025/001723, as an area of high nature conservation value in accordance with section 19F and 19G of the <i>Vegetation Management Act 1999</i>. The declaration was registered on the property title of Lots 19BO94, 15BO94, 16BO94 and 36BO175. The offset was registered and legally secured prior to the commencement of Stage 2 on 15 August 2025.
10B	Within 12 months of project commencement or the Minister approving the Offset Strategy for a subsequent development stage, the approval holder must submit for approval of the Minister an Offset Area Management Plan which includes:	Full	Compliant	Arrow submitted a draft Stage 1 OAMP for approval of the Minister on 21 October 2021 (within 12 months of project commencement). Revised OAMPs for Stage 1 were submitted on 6 March 2023, 13 September 2023 and 25 February 2025. The Stage 1 OAMP (2025) was approved by the Minister on 2 June 2025. Arrow is currently drafting the Stage 2 OAMP, which is due for submission for approval of the Minister prior to 19 June 2026. The Stage 1 OAMP includes the requirements of Condition 10B a) – i).
10B a)	a. a description of the management measures that will be implemented to protect EPBC listed threatened species and communities in each offset area;	Full	Compliant	Section 8 of the Stage 1 OAMP describes Arrows management measures that will be undertaken on the offset area in order to improve the attributes on each property and achieve the completion criteria.
10B b)	b. details of how the proposed offset(s) and Offset Area Management Plan are consistent with the principles EPBC Act Offsets Policy;	Full	Compliant	Section 2.1 of the Stage 1 OAMP outlines how eight overarching EPBC Act Environmental Offset Policy Principles have been considered in the Stage 1 OAMP (and references to relevant OAMP sections for each policy principle).

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
10B c)	c. a field validation survey and baseline description of the current condition (prior to any management activities) of the offset area(s), including existing vegetation;	Full	Compliant	Project activities and impact areas for Stage 1 are described in Section 1.5 of the Stage 1 OAMP. Field surveys conducted by suitably qualified ecologists for both the impact and offset areas have been undertaken. Ecological survey reports are included in Attachment 1 of the Stage 1 OAMP.
10B d)	d. a description and map (including shapefile(s)) to clearly define the location and boundaries of the offset area(s), accompanied by the offset attributes;	Full	Compliant	Sections 6.1-6.4 of the Stage 1 OAMP (and associated figures 7-9) define the offset area location and attributes for each MNES impacted in Stage 1 (South-Eastern Long-Eared Bat, Dunmall's Snake and Brigalow TEC).
10B e)	e. information about how the offset area(s) provide connectivity with other relevant habitats and biodiversity corridors including a map depicting the offset areas in relation to other habitats and biodiversity corridors;	Full	Compliant	Connectivity values of the proposed offset area are addressed in Section 5.1 of the Stage 1 OAMP. The location and regeneration activities are anticipated to • improve connectivity to the riparian vegetation along the Boyne River • extend the area of the available habitat and brigalow TEC • be linked to the corridors of the Barakula and Allies State Forests.
10B f)	f. details of how proposed management measures take into account relevant approved conservation advices and are consistent with the measures contained in relevant recovery plans and threat abatement plans;	Full	Compliant	Section 2.2 of the Stage 1 OAMP summarises how this plan addresses the relevant approved conservation advice for the relevant species and threatened ecological community identifying key threats and the provision of management measures to address the key threats (further described in Section 8).

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
10B g)	g. completion criteria and performance targets for evaluating the effectiveness of Offset Area Management Plan implementation, and criteria for triggering corrective actions (if necessary);	Full	Compliant	Offset completion criteria and interim performance targets are provided in Section 10 of the Stage 1 OAMP. Interim performance targets are used to track the trajectory of habitat quality toward the completion criteria during the management period. Section 8 describes management actions that will be implemented to enable the offset area to attain the completion criteria (and includes triggers for corrective actions, if required).
10B h)	h. a program to monitor, report on and review the effectiveness of the Offset Area Management Plan;	Full	Compliant	Section 11 of the Stage 1 OAMP identifies monitoring that will enable tracking of the trajectory of habitat quality towards the completion criteria by identifying changes in vegetation against baseline data. The monitoring will inform the nature of any management intervention of the offset area required. Reporting will be undertaken annually until the completion criteria is achieved. The OAMP includes third party ecology surveys and assessments be undertaken every five years starting in 2030 and landholder monitoring to be conducted every quarter. The OAMP was approved on 2 June 2025 and the offset property was secured on 5 August 2025. Arrow has complied with the monitoring requirements included in the OAMP for the reporting period. Monitoring data is included in the Annual Offset Area Report for the period 5 August 2025 to 21 October 2025 (note this covers only one quarter of landholder monitoring data for Year 1).
10B i)	i. a description of potential risks to the successful implementation of the offset(s) and Offset Area Management Plan, and contingency measures that would be implemented to mitigate against these risks.	Full	Compliant	Risks identified in the conservation advice are assessed in Section 7 of the OAMP taking into account required management actions. Triggers for implementing contingency measures and proposed contingency measures are provided in Section 8 of the Stage 1 OAMP.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
11A	The approval holder must not commence the subsequent development stage until the Offset Area Management Plan for the current development stage has been approved in writing by the Minister.	Full	Compliant	The Stage 1 OAMP was approved in writing by the Minister on 2 June 2025 which was prior to Stage 2 commencing on 15 August 2025.
13	Prior to commencement, the proponent must submit a Stage 1 Coal Seam Gas Water Monitoring and Management Plan (Stage 1 CSG WMMP) for the approval of the Minister who may seek the advice of an expert panel.	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Stage 1 CSG WMMP, addressing all of the requirements of Condition 13, was approved by the Minister on 18 December 2018. This was prior to the commencement of the action on 22 October 2020. The Stage 1 CSG WMMP remained in place for the reporting period following the variation to conditions approved on 27 February 2026 until the WRMMP was approved by the Minister on 21 November 2025. It remains published on Arrow's website.
13 a)	The Stage 1 CSG WMMP must include: a. an analysis of the results of the most recent OGIA model (built or endorsed by OGIA), relevant to all of the project's tenement areas;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Stage 1 CSG WMMP (Appendix E) included an analysis of results of the [then] most recent Office of Groundwater Impact Assessment (OGIA) model as described in the Groundwater Modelling Technical Memorandum.
13 b)	The Stage 1 CSG WMMP must include: b. a fit for purpose numerical simulation to assess potential impacts on water resources arising from the action in the project area, subsequent surface water-groundwater interactions in the Condamine Alluvium and impacts to dependent ecosystems;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Stage 1 CSG WMMP (Appendix F) described the numerical simulation used to assess potential impacts on water resources arising from the action in the project area, subsequent surface water-groundwater interactions in the Condamine Alluvium and impacts to dependent ecosystems.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
13 c)	The Stage 1 CSG WMMP must include: c. 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;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Stage 1 CSG WMMP (Section 3.4.2) (Appendix D Section 5) assessed the potential impacts on non-spring-based Groundwater Dependent Ecosystems (GDEs). The assessment identified that: - Ecosystems to the west of Millmerran (south-west of Cecil Plains) along the western slopes of the Kumbarilla Ridge (and western boundary of Arrow tenure) may be dependent on groundwater in the Springbok Sandstone and may be impacted by project-related groundwater drawdown. - Ecosystems south and west of Wandoan along minor drainage lines may be dependent on shallow groundwater in the Walloon Coal Measures and may be impacted by project-related groundwater drawdown. The actual dependence of these ecosystems was assessed through field investigations and the findings were reported in the Updated WMMP. The assessment did not identify any non-spring GDEs at potential risk of impact from the action and, as a result, there are no ongoing monitoring requirements required under the Updated WMMP for these features.
13 d)	The Stage 1 CSG WMMP must include: d. an assessment of predicted project wide groundwater drawdown levels and pressures from the action, together with confidence levels;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Stage 1 CSG WMMP (Section 3) included an assessment of predicted project wide groundwater drawdown levels, potential impacts and confidence levels. The predictions were made using a combination of existing groundwater models, with predicted water extraction for the Arrow SGP indicated a total production of 510 GL over the projected 40 year operational life, with a peak extraction of around 34 GL/yr approximately 7 years after commencement.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
13 e)	The Stage 1 CSG WMMP must include: e. parameters and a sampling regime to establish baseline data for surface and groundwater resources that may be impacted by the action, including: surface and water quantity and quality in the project area, and upstream and downstream of potential impact areas; groundwater quality, levels and pressures for areas that may be impacted by the project; and for determining connectivity between surface water and groundwater that may be impacted by the project;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	Arrow implemented a groundwater sampling and monitoring regime to establish baseline data for surface and groundwater resources as described in the Stage 1 CSG WMMP (Appendix J). The Stage 1 CSG WMMP monitoring network comprised a total of 105 discrete monitoring intervals (including 57 WCM intervals) at 32 discrete monitoring locations and provided a comprehensive early warning monitoring network.
13 f)	The Stage 1 CSG WMMP must include: f. a best practice baseline monitoring network that will enable the identification of spatial and temporal changes to surface and groundwater. This must include a proposal for aquifer connectivity studies and monitoring of relevant aquifers to determine hydraulic connectivity (including potential groundwater dependence of Long Swamp and Lake Broadwater) and must also enable monitoring of all aquatic ecosystems that may be impacted by the action;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	Arrow implemented a groundwater sampling and monitoring regime to establish baseline data for surface and groundwater resources as described in the Stage 1 CSG WMMP (Appendix J). The Stage 1 CSG WMMP monitoring network comprised a total of 105 discrete monitoring intervals (including 57 WCM intervals) at 32 discrete monitoring locations and provided a comprehensive early warning monitoring network.
13 g)	The Stage 1 CSG WMMP must include: g. a program to monitor subsidence impacts from the action, including trigger thresholds and reporting of monitoring results in annual reporting required by condition 28. If trigger thresholds are exceeded, the approval holder must develop and implement an action plan to address impacts within 90 calendar days of a trigger threshold being exceeded;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	In accordance with the requirements of the Stage 1 CSG WMMP (Appendix J), Arrow implemented a subsidence monitoring program as described in the Subsidence Technical Memorandum (Appendix K of the Stage 1 CSG WMMP). No exceedance from trigger thresholds has been found.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
13 h)	The Stage 1 CSG WMMP must include: h. provisions to make monitoring results publicly available on the approval holder's website to facilitate a greater understanding of cumulative impacts;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	Arrow has made public the results of data obtained from the water-related aspects of their monitoring network by providing raw data to the 'Queensland Globe' and publishing on Arrow's website the annual reports (2020-2021 and 2021-2022, 2022-2023, 2023-2024) In addition, under the Underground Water Impact Report 2021 for the Surat Cumulative Management Area (Surat CMA UWIR 2021 published by OGIA 2022), a water monitoring report is submitted to OGIA at the end of March and September each year that included details of the monitoring data collected under the Stage 1 CSG WMMP.
13 i)	The Stage 1 CSG WMMP must include: i. 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;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	As discussed in the Stage 1 CSG WMMP (Section 8), Arrow supports the ongoing application of the Joint Industry Plan (JIP), although no EPBC springs have been identified on Arrow's tenure, and no off-tenure EPBC springs fall under Arrow's responsibility. Arrow contributes to the periodic review of the JIP, including information that supports the JIP, through water-related data collected from Arrow's contribution to the Surat CMA UWIR. Arrow also contributes to the development of knowledge around ecosystem groundwater dependence and interaction through site-specific studies.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
13 j)	The Stage 1 CSG WMMP must include: j. a groundwater early warning monitoring system, including: i. groundwater drawdown limits for all consolidated aquifers potentially impacted by the action, excluding the Walloon Coal Measures; ii. for the Condamine Alluvium, appropriate triggers and groundwater limits and a rationale for their selection; iii. early warning indicators and trigger thresholds, including for Lake Broadwater, Long Swamp and other groundwater dependent ecosystems that may potentially be impacted by the action, including those that may occur outside the project area and may be impacts by the action; and iv. investigation, management and mitigation actions, including substation and/or groundwater repressurisation, for both early warning indicators and trigger thresholds to address flux impacts on the Condamine Alluvium.	Part 22 Oct 2024 - 26 Feb 2025	Compliant	As described in the Stage 1 CSG WMMP (Section 5), Arrow implemented an early warning monitoring system, underpinned by a comprehensive early warning monitoring network.
13 k)	The Stage 1 CSG WMMP must include: k. early warning indicators and trigger thresholds, including corrective actions for both early warning indicators and trigger thresholds, for aquatic ecology and aquatic ecosystems;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Stage 1 CSG WMMP (Section 5.3 and Section 6 of Appendix I) described how that, given discharge of produced water to surface water systems is not proposed for the SGP, an early warning monitoring system (EWMS) for aquatic ecology and ecosystems is not currently required. Nonetheless, Section 5.3 of the Stage 1 CSG WMMP stated that any future early warning indicators and trigger thresholds for aquatic ecology and aquatic ecosystems would be established using the approved EWMS framework in Section 5.2 of the Stage 1 CSG WMMP.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
13 l)	The Stage 1 CSG WMMP must include: l. a CSG water management strategy for produced salt/brine, which discusses how co-produced water and brine will be managed for the action, including in the context of other coal seam gas activities in the Surat Basin;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Stage 1 CSG WMMP (Section 4.1 and Section 3.2 of Appendix G) described the CSG water management strategy (WMS) for produced salt/brine and how it will be managed for the action. Although the CSG water management strategy includes all possible options for the SGP, it is noted that discharge of CSG water to surface water or re-injection of CSG water are not components of the SGP. Arrow's CSG water management strategy comprises beneficial uses, including water for Arrow operational supply and for supply to existing users. These options aim to maximise beneficial use and reduce the potential for environmental impact.
13 m)	The Stage 1 CSG WMMP must include: m. an analysis of how the approval holder will utilise beneficial use and/or groundwater repressurisation techniques to manage produced CSG water from the action, and how any potential adverse impacts associated with groundwater repressurisation will be managed;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Stage 1 CSG WMMP (Section 3.3 of Appendix G) described how Arrow utilised our beneficial use and/or groundwater re-pressurisation techniques to manage produced CSG water. Arrow's CSG Water Management Strategy considered a range of end uses for treated and untreated CSG water, including agricultural, industrial, domestic and urban applications, aiming to maximise beneficial use and reduce the potential for environmental impact. CSG water injection, either for aquifer re-pressurisation or as a means for CSG water management, was not proposed during the reporting period due to the potential risks to receiving aquifer.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
13 n)	The Stage 1 CSG WMMP must include: n. a discharge strategy, consistent with the recommendations and requirements of the Department of the Environment and Heritage Protection in its Assessment Report (pages 94 to 95 and pages 254 to 255) and that includes scenarios where discharge may be required, the quality of discharge water (including water treated by reverse osmosis), the number and location of monitoring sites (including upstream and downstream sites), frequency of monitoring and how the data from monitoring will be analysed and reported, including recommendations on any changes or remedial actions that would be required;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	Discharge is not proposed to occur during this action.
13 o)	The Stage 1 CSG WMMP must include: o. a flood risk assessment for processing facilities and any raw co-produced water and brine dams, which addresses flood risks to the environment from the action in the case of a 1 :1000 ARI event. The risk assessment should estimate the consequences if major project infrastructure was subject to such an event, including release of brine and chemicals into the environment;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Stage 1 CSG WMMP (Section 4.2 and Appendix H) detailed a flood risk assessment for processing facilities and any raw co-produced water and brine dams involved in the action, as well as the subsequent flood risk management actions. The risk assessment implemented a hierarchy of controls in the following order: I) Hazard elimination This approach seeks to locate infrastructure outside of the mapped inundation area. If a major infrastructure is located outside of the mapped inundation area, the hazard is deemed to have been eliminated and no further risk assessment is required. II) Substitution There are currently no alternatives to the gas processing and co-produced water infrastructure and gasfield layout proposed by Arrow. Substitution is not a feasible control option.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
				III) Engineering controls Where gas processing and co-produced water infrastructure cannot be located outside of the mapped inundation area, engineering controls (e.g., modelling changes to overland flow paths, appropriately designing and operating the structures, dam failure modelling) are in place to prevent and minimise/mitigate the adverse impacts of the flood event. IV) Administrative controls. Administrative controls may include monitoring of storm warning systems and implementing management controls that reduce the risk of infrastructure failing or malfunctioning in flood events. As a part of risk assessment and mitigation, Arrow conducted predictive flood modelling (completed by Worley Parsons 2013) to predict flood levels, extents of inundation, maximum depths and velocities of floodwaters for the 50, 100, 500 and 1,000 years ARI flood events along prominent drainage lines within Arrow's tenements.
13 p)	The Stage 1 CSG WMMP must include: p. a cumulative impact assessment based on the outputs of the OGIA model which integrates groundwater model outputs with known and potential groundwater dependent ecosystems and presents the outputs in map form. Contribute to investigations coordinated through the OGIA to assess hydrological and ecological characteristics of impacted groundwater dependent ecosystems;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Stage 1 CSG WMMP (Section 8.6 and Section 6 of Appendix D) included a cumulative impact assessment integrating groundwater model outputs (based on the OGIA model) with known and potential groundwater dependent ecosystems. OGIA technical research projects included developing groundwater flow system knowledge and incorporating this in a revised groundwater flow model. This work helped develop the understanding of cumulative impacts in the Surat Cumulative Management Area, and informed future updates to the Updated CSG WMMP. Understanding cumulative impacts better is a result of sharing data collected from the ongoing monitoring of water pressure, level and quality across Arrow's groundwater monitoring network.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
13 q)	The Stage 1 CSG WMMP must include: q. details of performance measures; annual reporting to the Department; and publication of reports on the internet	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Stage 1 CSG WMMP (Section 9) described how Arrow includes all relevant details of performance measures, annual reporting to the Department and publication of reports on the internet. Relevant reports can be found on Arrow's website: https://www.arrowenergy.com.au/environment/environmental-management-plans-and-reports
13 r)	The Stage 1 CSG WMMP must include: r. an explanation of how the Stage 1 CSG WMMP will contribute to work undertaken by other CSG proponents in the Surat Basin to understand cumulative impacts, including at the local and regional scale, and maximise environmental benefit.	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Stage 1 CSG WMMP (Section 8.6) described how Arrow has contributed to the work being undertaken by other proponents in the Surat Basin to better understand cumulative impacts. This has been achieved through various means such as OGIA data review, research projects and industry contribution.
13A	For the protection of water resources and EPBC-listed springs within the Surat CMA, the approval holder must ensure that the outcomes and sub- outcomes specified in the table below are achieved and maintained:	Part 27 Feb 2025 - 21 Oct 2025	Compliant	Arrow submitted a Joint Industry Framework (JIF) Annual Compliance Report for the reporting period to the Department on 20 January 2026. Arrow has achieved and maintained the outcomes and sub-outcomes as summarised below: • Arrow has not exceeded the risk threshold in the JIF for EPBC-listed springs or aquatic GDEs, • Arrow complies with its make good obligations identified under the Queensland Water Act 2000 (Water Act) and UWIR, and • For terrestrial and subterranean groundwater dependent ecosystems (TGDEs and SGDEs) preliminary risk assessments have been completed, identifying ten and eight high risk sites for TGDEs and SGDEs respectively. The Department was notified of the outcome of the preliminary risk assessments by the required date on 26 May 2025. The supplementary risk assessments for the identified high risk sites are required to be submitted after the current reporting period. No site-specific assessments have been required to be undertaken.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
14	The Stage 1 CSG WMMP must be peer reviewed by a suitably qualified water resources experts approved by the Minister in writing. The peer review must be submitted to the Minister together with the Stage 1 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 of the Stage 1 CSG WMMP.	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The approved Stage 1 CSG WMMP was peer reviewed by an independent and suitably qualified water resources expert (who was approved by the Minister) on 14 December 2017. The peer review and the requisite statement from the expert were submitted to the Minister prior to the approval of the Stage 1 CSG WMMP and are included in Appendix L of the Stage 1 CSG WMMP.
14A	To ensure the outcomes in Condition 13A are achieved and maintained, the approval holder must manage impacts on water resources and EPBC-listed springs in accordance with the relevant risk management framework/s.	Part 27 Feb 2025 - 21 Oct 2025	Compliant	See comment for Condition 13A.
14B	If, at any time during the period for which this approval has effect, an impact/s potentially occurring within the approval holder's project area is, or has been, identified as a high risk or very high risk impact in accordance with the relevant risk management framework/s, the approval holder must notify the department within 20 business days.	Part 27 Feb 2025 - 21 Oct 2025	Compliant	Preliminary risk assessments have been completed, identifying ten and eight high risk sites for TGDEs and SGDEs respectively. The preliminary risk assessments were completed within 3 months of the commencement of this condition, with the Department notified of the outcome of the preliminary risk assessments the within 20 business days of the risk assessment, on 26 May 2025. The supplementary risk assessments for the identified high risk sites are required to be submitted after the current reporting period. No site-specific assessments have been required to be undertaken.
14C	If a high risk or very high risk impact is identified under Condition 14B before the UWIR 2021 is replaced with an updated UWIR, the approval holder must submit the information required under Condition 14D within 3 months (or a timeframe otherwise agreed to by the Minister in writing) of notifying the department of the high risk or very high risk impact.	Part 27 Feb 2025 - 21 Oct 2025	Compliant	The UWIR 2021 had not been replaced during the reporting period. The timeframe for the submission of the supplementary risk assessments for the identified high risk sites was agreed to by the Minister in writing on 12 August 2025, being 15 February 2026 and 30 April 2027 for the TGDE and SGDE supplementary risk assessments respectively, which are after this reporting period. No site-specific assessments have been required to be undertaken.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
14D	Within 9 months (or a timeframe otherwise agreed to by the Minister in writing) of notifying the department of the very high risk or high-risk impact, the approval holder must: a. provide for the written approval of the Minister: i. description and location of impact/s and associated users; ii. performance criteria; iii. trigger values; iv. limits; and v. the contributing well/s, including identification number, GPS coordinates and shapefiles; or b. provide a statement as to why the provision of performance criteria, trigger values, limits and contributing well/s is not necessary for the written agreement of the Minister.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	See comment for Condition 14C.
14E	If the statement provided under Condition 14D is not agreed to by the Minister in writing, the approval holder must provide the description and location of impact/s and associated users, performance criteria, trigger values, limits and contributing well/s for the written approval of the Minister within a timeframe specified by the Minister in writing.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	No site-specific assessments have been required to be undertaken and a statement under Condition 14D has not been submitted to the Minister.
14F	A description and location of impact/s and associated users, performance criteria, trigger values, limits and contributing well/s, or statement provided under Condition 14D, must be submitted to the Minister with an accompanying site-specific assessment prepared by a suitably qualified water resources expert and accompanied by a peer review undertaken by an independent suitably qualified water resources expert.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	No site-specific assessments have been required to be undertaken.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
14G	If the information specified in Conditions 14D(a)(i) to (v) have not been approved by the Minister in writing within 6 months of being provided to the Minister, the approval holder must undertake impact management in accordance with any interim performance criteria, trigger values and limits set by the Minister in writing.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	No site-specific assessments have been required to be undertaken.
14H	The approval holder must submit an Outcomes Assurance Statement for each high risk or very high risk impact to the Minister for each 12 month period: a. following the date of approval of the description and location of impact/s and associated users, performance criteria, trigger values and limits; or b. following the date the Minister notified the approval holder in writing that interim performance criteria, trigger values and limits had been set; or c. following the date otherwise agreed to in writing by the Minister. The Outcomes Assurance Statement must be submitted in accordance with reporting requirements specified in the JIF.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	An Outcomes Assurance Statement has not been required as no site-specific assessments have been required to be undertaken.
14I	The approval holder must provide any additional information requested by the Minister in writing, within a timeframe specified by the Minister in writing, to substantiate an Outcomes Assurance Statement and/or to verify the risk of not achieving the outcome/s specified in Condition 13A.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	An Outcomes Assurance Statement has not been required. A request has not been received from the Minister.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
14J	If the Minister believes on the basis of the Outcomes Assurance Statement, any information provided under Condition 14K and any other relevant information that the outcomes in Condition 13A are not likely to be achieved, the Minister may notify the approval holder in writing specifying the areas requiring improvement or additional information. If notified, the approval holder must develop and implement adaptive management responses to address the specified areas and provide a written report to the Minister within 3 months of the notification setting out the responses and their effectiveness.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	An Outcomes Assurance Statement has not been required. A notification has not been received from the Minister.
14K	If the approval holder detects that an approved or interim trigger value has been exceeded, the approval holder must implement an appropriate management response to ensure approved or interim limits are not exceeded. The approval holder must report this exceedance, and the contributing well/s, to the department within 10 business days of the detection.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	No site-specific assessments have been required to be undertaken. There are no approved or interim trigger values assigned.
14L	If the approval holder detects that a limit has been exceeded, the approval holder must report this and the contributing well/s to the department within 10 business days of the detection.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	No site-specific assessments have been required to be undertaken. There are no limits assigned.
14M	Unless otherwise notified by the Minister in writing, the approval holder must cease groundwater extraction associated with the contributing well/s identified in Condition 14L within 10 business days of an exceedance of a limit being reported to the department, or of receiving notification that the Minister has determined that the outcome/s specified under Condition 13A have not been achieved.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	No site-specific assessments have been required to be undertaken. There are no limits assigned.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
14N	If the approval holder has been required to cease groundwater extraction pursuant to Condition 14M, the approval holder must urgently implement corrective actions to reduce performance criteria below approved or interim limits and trigger values. The approval holder must not recommence groundwater extraction until: - the impact has been reversed; or - the Minister has agreed, in writing, that the outcome/s specified in Condition 13A has been achieved; and - written approval to recommence groundwater extraction has been given by the Minister.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	Arrow has not been required to cease groundwater extraction pursuant to Condition 14M
15	The approval holder must not exceed the groundwater drawdown or groundwater limits for each aquifer specified in the Stage 1 CSG WMMP.	Part 22 Oct 2024 - 26 Feb 2025	Compliant	Arrow has not exceeded the groundwater drawdown or groundwater limits specified in the approved Stage 1 CSG WMMP.
16	Unless otherwise agreed in writing by the Minister, the approval holder must not commence the action until the Stage 1 CSG WMMP is approved in writing by the Minister. The approved Stage 1 CSG WMMP must be implemented.	Part 22 Oct 2024 - 26 Feb 2025	Compliant	Arrow commenced the action 22 October 2020, after the Stage 1 CSG WMMP was approved in writing by the Minister on 18 December 2018. The approved Stage 1 CSG WMMP was implemented.
17	The approval holder must submit an updated CSG Water Monitoring and Management Plan (Updated CSG WMMP) for the written approval of the Minister.	Part 22 Oct 2024 - 26 Feb 2025	Compliant	Arrow's Updated CSG WMMP, addressing all of the requirements of EPBC Approval Condition 17, was submitted to the then Department of the Environment and Energy in October 2019 and approved on 22 November 2019.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
17 a)	The Updated CSG WMMP must: a. include all matters in the Stage 1 CSG WMMP, and discuss how the Stage 1 CSG WMMP is informing adaptive management for the Updated CSG WMMP;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Updated CSG WMMP included, and built upon, all the matters of the Stage 1 CSG WMMP. The Updated CSG WMMP (Section 7 and Appendix A) described how the Stage 1 CSG WMMP informed the adaptive management for the Updated CSG WMMP. The following initiatives underpinned the adaptive management: • Arrow's ongoing groundwater and surface water baseline monitoring program; • Arrow's contribution to the Condamine Interconnectivity Research Project (CIRP) (OGIA 2016); • Updated CSG WMMP numerical modelling utilising the 2016 UWIR model and the 2012 OGIA model, with the revised Updated CSG WMMP field development plan (FDP); and • Updated CSG WMMP terrestrial GDE risk mapping and GDE and inter-aquifer connectivity field investigations.
17 b)	The Updated CSG WMMP must: b. include any updated modelling for the project, including in respect of the OGIA model or any updates to the OGIA model by OGIA;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Updated CSG WMMP (Section 4 and Appendix C) included updated modelling for the project. Key features of the Updated CSG WMMP modelling include the revised Updated Field Development Plan Case water production and the adoption of the OGIA 2016 Groundwater Model in place of the OGIA 2012 Groundwater Model.
17 c)	The Updated CSG WMMP must: c. include an explanation of how the approval holder will contribute to the Condamine Interconnectivity Research Project. The Updated CSG WMMP must present the findings of the Condamine Interconnectivity Research project and any modelling done by the OGIA to validate predicted drawdown and a review of trigger thresholds and corrective activities for the action;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Updated CSG WMMP (Section 3.2 and Appendix C) described how Arrow contributed and presented the findings of the Condamine Interconnectivity Research Project (CIRP). The CIRP was led by the OGIA with Arrow undertaking drilling and pumping test investigations, and collaborative arrangements with parties that included Queensland University of Technology for assessing hydrochemical data. The CIRP findings, including revisions to the geological model of the interface between the Condamine Alluvium and Walloon Coal Measures, have been adopted for the Surat CMA UWIR, and are incorporated into the 2016 OGIA Groundwater Model (refer to Section 4).

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
17 d)	The Updated CSG WMMP must: d. report on the potential for flow reversal from the Condamine Alluvium to underlying aquifers, based on data obtained during the Stage 1 CSG WMMP;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Updated CSG WMMP (Section 4.3.2 and Appendix C) described the change in net vertical flux to the Condamine Alluvium. The predicted peak changes in vertical flux at the base of the alluvium, as a percentage of the predicted peak rate of water production, is indicated to be relatively small (a few percent or less).
17 e)	The Updated CSG WMMP must: e. review and update the monitoring network in Stage 1 WMMP to reflect changes in understanding of impacts to water resources, including from baseline monitoring and relevant research;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Updated CSG WMMP (Section 3.1, 7.1 and Appendix G) reviewed and updated the monitoring network from the Stage 1 WMMP and has reflected the changes in understanding of impacts to water resources. The Updated CSG WMMP monitoring network, comprised 105 monitoring bore/vibrating wire piezometer intervals. The updated CSG WMMP monitoring bores presented in Table 7-1, providing the location, target aquifer, status and purpose of the bores. This updated monitoring network demonstrates Arrow's commitment to groundwater level and quality monitoring across its tenure in each potentially affected aquifer that constitutes the groundwater resource.
17 f)	The Updated CSG WMMP must: f. identify any predicted changes in stream connectivity due to groundwater drawdown from the action and assess potential impacts to groundwater dependent ecosystems due to any predicted changes in stream connectivity, including to water quality, quantity and ecology;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Updated CSG WMMP (Section 4.4, 5.2 and Appendix G) outlined the predicted changes in stream connectivity and GDE impacts resultant from groundwater drawdown. For practical purposes, the predicted impacts of groundwater flux changes to the connected reaches in the Condamine River from the action are considered negligible. Additionally, the potential impacts to existing aquatic ecosystems and surface expression GDEs dependent on the Condamine River are also expected to be negligible.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
17 g)	The Updated CSG WMMP must: g. address any uncertainty in the groundwater-dependency of ecosystems and springs with supporting evidence from field-based investigations for any groundwater-dependent ecosystems and springs confirmed in the OGIA model;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Updated CSG WMMP (Section 5.3 and Appendix D) detailed the groundwater dependency of ecosystems and springs at sites potentially impacted by the action. On the basis of the outcomes of the GDE risk assessments conducted in the SGP Stage 1 CSG WMMP GDE risk assessment, four sites (Burunga Lane, Glenburnie, Long Swamp, Lake Broadwater) were chosen for field investigations. The groundwater dependence of these ecosystems was assessed through field investigations and the findings were reported in the Updated CSG WMMP. The assessment did not identify any non-spring GDEs at potential risk of impact from the action and, as a result, there are no ongoing monitoring requirements required under the Updated WMMP for these features.
17 h) i.	The Updated CSG WMMP must: h. provide details of an ongoing monitoring plan that: i. sets out the frequency of monitoring and rationale for the frequency;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Updated CSG WMMP (Section 7.3 and Appendix G) described the ongoing monitoring plan, with the monitoring frequencies aligning with those specified in the Surat CMA UWIR. The following monitoring frequencies were adopted for the Updated CSG WMMP: - Groundwater pressure/level Hourly frequency of data collection where a data logger is installed. Where this occurs, bi-annual manual readings will also be collected in wells with open standpipes. This data will be used in conjunction with logger download data. Where a data logger is not installed, fortnightly data collection. - Groundwater quality The groundwater quality sampling frequency is bi-annually.
17 h) ii.	The Updated CSG WMMP must: h. provide details of an ongoing monitoring plan that: ii. includes continued collection of baseline data for each monitoring site over the life of the project;	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Updated CSG WMMP (Section 3.1, 7.3 and Appendix G) included the details of the collection of baseline data for each monitoring site. Ongoing collection of baseline groundwater monitoring data was a key element of the monitoring system and were collected from each monitoring site in alignment with the Surat CMA UWIR requirements.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
17 h) iii.	The Updated CSG WMMP must: h. provide details of an ongoing monitoring plan that: iii. outlines the approach to be taken to analyse the results including the methods to determine trends to indicate potential impacts	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Updated CSG WMMP (Section 7.4 and Appendix G) outlined the analysis of the results including the analysis of methods used to indicate potential impacts. Measurement of groundwater levels, either as hydrostatic pressure or physical water levels in monitoring bores, is the primary means of assessing changes to a groundwater resource. The ongoing and structured monitoring of a network of groundwater monitoring points provides the base data that can be interrogated to enable an understanding of trends and identify whether impacts may occur.
17 h) iv.	The Updated CSG WMMP must: h. provide details of an ongoing monitoring plan that: iv. builds on the groundwater early warning system required at condition 13 (j) and sets out early warning indicators and trigger thresholds and limits for groundwater and surface water.	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Updated CSG WMMP (Section 7.5 and Appendix G) built on the groundwater early warning monitoring system required at condition 13 (j) in the Stage 1 CSG WMMP. The early warning monitoring system framework was refined and expanded upon in the Updated CSG WMMP to address EPBC Approval Condition 17(a) and 17(h)iv.
17 i)	The Updated CSG WMMP must: i. include a risk based exceedance response plan that details the corrective activities the approval holder will take and the timeframes in which those activities will be undertaken if: early warning indicators and trigger threshold values contained in the Updated CSG WMMP are exceeded, or there are any emergency discharges.	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Updated CSG WMMP (Section 7.6, 8.2 and Appendix G) detailed the actions to be taken and timeframes if early warning indicators or trigger threshold values are exceeded. Response actions, in the form of escalating actions for responding to exceedances of early warning indicators or trigger thresholds, formed a key component of the early warning monitoring system, with the operation of early warning monitoring system illustrated in Figure 7-8 in the Updated CSG WMMP.
17A	Within 4 months from the date this variation is signed, the approval holder must submit a Water Resource Monitoring and Management Plan (WRMMP) for the written approval of the Minister. The WRMMP must include: a. Parameters and a sampling regime to establish baseline data for surface water resources that may be impacted by the action, including: surface water quality and quantity in	Part 27 Feb 2025 - 21 Oct 2025	Compliant	Arrow's Water Resources Monitoring and Management Plan (WRRMP), addressing all of the requirements of EPBC Approval Condition 17A, was submitted to the Department on 27 June 2025. This was within 4 months of the variation dated 27 February 2025 as required by the approval conditions at the time. Note the condition was changed to 3 months with the variation dated 10 November 2025, however this was post submission of the WRRMP to the Department.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
	the project area, and upstream and downstream of potential impact areas; and for determining connectivity between surface water and groundwater that may be impacted by the project; b. A best practice monitoring network that will enable the identification of spatial and temporal changes to surface water parameters from baseline monitoring. This must enable monitoring of all aquatic ecosystems that may be impacted by the action. c. A program to monitor subsidence impacts from the action on protected matters. The subsidence monitoring program must: i. establish baseline data; ii. establish and justify subsidence monitoring and associated data collection methods; iii. establish and justify appropriate subsidence trigger thresholds. If subsidence trigger thresholds are exceeded, the approval holder must develop and implement an action plan to address impacts on protected matters within 90 calendar days of a trigger value being exceeded; iv. be reported annually and in accordance with the reporting requirements of condition 28. Annual reporting must compare subsidence monitoring results with baseline data and predicted impacts from the Supplementary Report to the Environmental Impact Statement (SREIS), and demonstrate the effectiveness of the implemented action plan, if required under 17A(c)iii; d. Provision to make monitoring results publicly available on the approval holder's website to facilitate a greater understanding of cumulative impacts; e. A CSG water management strategy for produced salt/brine, which discusses how co-produced water and			The WRMMP was approved by the Minister on 21 November 2025, after this annual reporting period.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
	brine will be managed for the Action, including in the context of other coal seam gas activities in the Surat Basin; f. Early warning indicators and trigger thresholds, including investigation, management and mitigation actions, which may include substitution and/or groundwater repressurisation, to address flux impacts on the Condamine Alluvium; g. An analysis of how the approval holder will utilise beneficial use and/or groundwater repressurisation techniques to manage produced CSG water from the Action, and how any potential adverse impacts associated with groundwater repressurisation will be managed; h. Early warning indicators and trigger thresholds, including corrective actions for both early warning indicators and trigger thresholds, for aquatic ecology and aquatic ecosystems; i. A discharge strategy, consistent with the recommendations and requirements of the Department of the Environment and Heritage Protection (now the Department of Environment and Science) in its Assessment Report (pages 94 to 95 and pages 254 to 255) and that includes scenarios where discharge may be required, the quality of discharge water (including water treated by reverse osmosis), the number and location of monitoring sites (including upstream and downstream sites), frequency of monitoring and how the data from monitoring will be analysed and reported, including recommendations on any changes or remedial actions that would be required; j. A flood risk assessment for processing facilities and any raw co-produced water and brine dams, which addresses flood risks to the environment from the action in the case of a 1:1000 ARI event. The risk assessment should			

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
	estimate the consequences if major project infrastructure was subject to such an event, including release of brine and chemicals into the environment; k. An explanation of how the WRMMP will contribute to work undertaken by other CSG proponents in the Surat Basin to understand cumulative impacts, including at the local and regional scale, and maximise environmental benefit; l. Details of performance measures; annual reporting to the department; and publication of reports on the website; m. Include 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 WRMMP are exceeded, or there are any emergency discharges.			
18	The Updated CSG WMMP must be peer reviewed by a suitably qualified water resources expert/s approved by the Minister in writing prior to the plan being submitted to the Minister for approval. The approval holder must, at the same time as the Updated CSG WMMP is submitted for approval, provide to the Minister: a. a copy of the peer review; and b. a statement from the suitably qualified water resources expert/s stating that they carried out the peer review and endorse the findings of the Updated CSG WMMP.	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The approved Updated CSG WMMP was peer reviewed by an independent and suitably qualified water resources expert (who was approved by the Minister on 7 July 2015) on 19 March 2019. The peer review and the requisite statement from the expert are included in Appendix L of the Updated CSG WMMP as submitted to the Minister.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
18	The WRMMP must be peer reviewed by a suitably qualified water resources expert/s approved by the Minister in writing prior to the plan being submitted to the Minister for approval. The approval holder must, at the same time as the WRMMP is submitted for approval, provide to the Minister: a. a copy of the peer review; and b. statement from the suitably qualified water resources expert/s stating that they carried out the peer review and endorse the findings of the WRMMP.	Part 27 Feb 2025 - 21 Oct 2025	Compliant	The WRMMP was peer reviewed by an independent and suitably qualified water resources expert (who was approved by the Minister on 7 July 2015). The peer review and the requisite statement from the expert are included in Appendix I of the WRMMP as submitted to the Minister.
19	The approval holder must not exceed the groundwater drawdown or groundwater limits specified in the approved Updated CSG WMMP.	Part 22 Oct 2024 - 26 Feb 2025	Compliant	Arrow has not exceeded the groundwater drawdown or groundwater limits specified in the approved SGP Updated CSG WMMP. A full comparison of monitoring data against the approved early warning monitoring system is provided in the annual report(s).
19A	Until the WRMMP required by condition 17A is approved by the Minister, the approval holder must implement the Updated CSG WMMP.	Part 27 Feb 2025 - 21 Oct 2025	Compliant	Arrow implemented the Updated CSG WMMP during the reporting period, with the WRMMP approved by the Minister after the reporting period on 21 November 2025.
19B	When the WRMMP required by condition 17A is approved by the Minister, the approval holder must implement the approved WRMMP.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	The WRMMP was approved by the Minister on 21 November 2025, after the reporting period.
19C	The approval holder may extract gas from more than 250 CSG production wells, notwithstanding that the WRMMP has not been approved and notwithstanding any contrary statement in the Updated CSG WMMP.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	Noted.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
20	The Minister may direct, in writing, that the approval holder cease water or gas extraction from one or more coal seam gas production wells, or water discharge or use, if: a. an early warning indicator, trigger threshold or limit is exceeded, and b. the Minister is not satisfied that the corrective activities proposed or taken by the approval holder will reduce likely impacts on matters of national environmental significance (MNES) to acceptable levels.	Part 22 Oct 2024 - 26 Feb 2025	Not applicable	No directions have been received.
20A	If condition 20 applies, the Minister may direct the approval holder to implement alternative corrective activities at the expense of the approval holder, provided those corrective activities are unlikely to have a significant impact on MNES.	Part 22 Oct 2024 - 26 Feb 2025	Not applicable	No directions have been received.
20B	If condition 20 applies, the approval holder must not recommence such extraction or discharge or use until the Minister has given approval in writing for the recommencement of that extraction, discharge or use. a. Approval to recommence such extraction, discharge or use may be subject to such conditions as the Minister considers reasonably necessary to ensure that impacts on MNES will be acceptable. b. If the Minister approves the recommencement of extraction, discharge or use subject to conditions, the approval holder must comply with such conditions.	Part 22 Oct 2024 - 26 Feb 2025	Not applicable	No directions have been received.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
20C	The Minister may direct, in writing, that the approval holder cease water or gas extraction from one or more coal seam gas production wells, or water discharge or use, if: a. an early warning indicator, trigger threshold, or limit in the WRMMP is exceeded, and b. the Minister is not satisfied that the corrective activities proposed or taken by the approval holder will reduce likely impacts on matters of national environmental significance (MNES) to acceptable levels.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	No directions have been received.
20D	If Condition 20C applies, the Minister may direct the approval holder to implement alternative corrective activities at the expense of the approval holder, provided those corrective activities are unlikely to have a significant impact on MNES.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	No directions have been received.
20E	If Condition 20C applies, the approval holder must not recommence such extraction or discharge or use until the Minister has given approval in writing for the recommencement of that extraction, discharge or use. a. Approval to recommence such extraction, discharge or use may be subject to such conditions as the Minister considers reasonably necessary to ensure that impacts on MNES will be acceptable. b. If the Minister approves the recommencement of extraction, discharge or use subject to conditions, the approval holder must comply with such conditions.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	No directions have been received.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
21	The approval holder must not commence the extraction of gas from any coal seam gas production wells unless the Updated CSG WMMP has been approved by the Minister in writing. The approved Updated CSG WMMP must be implemented. The Stage 1 CSG WMMP will apply until the commencement of the approved Updated CSG WMMP.	Part 22 Oct 2024 - 26 Feb 2025	Compliant	No extraction of water or coal seam gas authorised under this EPBC Approval occurred prior to the Minister's approval of the Updated CSG WMMP on 22 November 2019. The approved Updated CSG WMMP was implemented and published on Arrow's website. Obligations under the Updated CSG WMMP were reported separately. The obligations in the Stage 1 CSG WMMP were relevant and implemented as required by Condition 17(a). The Stage 1 CSG WMMP was appended to the Updated CSG WMMP.
21A	If the Minister has approved the Updated CSG WMMP, the approval holder may commence extraction of gas from: a. 250 coal seam gas production wells; b. a larger number of coal seam gas production wells as specified by the Minister if he or she is satisfied that: i. the approval holder has commenced gas extraction from at least 125 coal seam gas production wells; ii. the approval holder has requested an increase in the number of wells from which gas can be extracted under the approved Updated CSG WMMP; and iii. extraction of gas from the additional number of coal seam gas production wells will not have an unacceptable impact on MNES.	Part 22 Oct 2024 - 26 Feb 2025	Compliant	The Updated CSG WMMP was approved by the Minister on 22 November 2019. Arrow has not exceeded the 250 well limit specified by Condition 21A. Of the wells spudded between 22 October 2020 and 21 October 2025, 247 came online and began producing within this same period.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
23	If the OGIA model ceases to exist, the approval holder must: a. submit an alternate model that replaces the OGIA model for the approval of the Minister; b. revise the Updated CSG WMMP to incorporate the approved alternate model, and submit the revised plan to the Minister for approval; and c. implement the approved revised plan.	Part 22 Oct 2024 - 26 Feb 2025	Not applicable	The OGIA model remains current and was used for the purposes of the Updated CSG WMMP.
25	The Minister may, by written request to the approval holder, require the Stage 1 CSG WMMP or the Updated CSG WMMP to be revised, including to address expert advice. Any request must be acted on by the approval holder within the timeframe specified in the request.	Part 22 Oct 2024 - 26 Feb 2025	Not applicable	Noted. Arrow did not receive a request from the Minister to revise the Stage 1 CSG WMMP or the Updated CSG WMMP.
25	The Minister may, by written request to the approval holder, require the WRMMP to be revised, including to address expert advice. Any request must be acted on by the approval holder within the timeframe specified in the request.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	Noted. The WRMMP was not approved until after the reporting period.
26	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.	Full	Compliant	The Department was advised of the commencement of Stage 1 (22 October 2020) on 18 November 2020.
26A	The approval holder must maintain accurate and complete compliance records and document the procedure for recording and storing compliance records.	Part 27 Feb 2025 - 21 Oct 2025	Compliant	Accurate records substantiating all activities associated with or relevant to the conditions of this EPBC Approval, including measures taken to implement the management plans, reports or strategies required are stored in Arrow file directories.
26B	If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	Noted. Arrow has not received a request from the Department requesting electronic copies of compliance records.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
26C	The approval holder must ensure that any monitoring data, surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Guidelines for biological survey and mapped data, Commonwealth of Australia 2018, or as otherwise specified by the Minister in writing.	Part 27 Feb 2025 - 21 Oct 2025	Compliant	Monitoring data, surveys, maps, and other spatial and metadata required under the conditions of this approval has been prepared in accordance with the Guidelines for biological survey and mapped data, Commonwealth of Australia 2018.
26D	The approval holder must ensure that any monitoring data, surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Guide to providing maps and boundary data for EPBC Act projects, Commonwealth of Australia 2021, or as otherwise specified by the Minister in writing.	Part 27 Feb 2025 - 21 Oct 2025	Compliant	Maps and spatial data have been provided in accordance with the Guide to providing maps and boundary data for EPBC Act projects, Commonwealth of Australia 2021.
26E	The approval holder must submit all monitoring data, surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) electronically to the department within the timeframe specified in the plans, or where no timeframe is provided under a plan, within 20 business days.	Part 27 Feb 2025 - 21 Oct 2025	Compliant	The Stage 1 OAMP requires third party ecology surveys and assessments be undertaken every five years starting in 2030 and landholder monitoring to be conducted every quarter. The Stage 1 OAMP was approved on 2 June 2025 and the offset property was secured on 5 August 2025. Arrow has complied with the monitoring requirements included in the OAMP and monitoring data is included in the SGP PL Killara Annual Offset Area Report (2026) for the period from when the property was secured on 5 August 2025 to the end of the annual reporting period, being 21 October 2025. The SGP PL Killara Annual Offset Area Report (2026) was submitted to the department in accordance with the timeframe approved in the Stage 1 OAMP and aligned with submission of this annual compliance report.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
27	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 28) 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.	Part 22 Oct 2024 - 26 Feb 2025	Compliant	Accurate records substantiating all activities associated with or relevant to the conditions of this EPBC Approval, including measures taken to implement the management plans, reports or strategies required are stored in Arrow file directories. There have been no confirmed cases of non-compliance during the current reporting period.
27	The approval holder must prepare a compliance report for each Annual Compliance Report period (ACR period).	Part 27 Feb 2025 - 21 Oct 2025	Compliant	This report has been prepared for the annual compliance reporting period 22 October 2024 to 21 October 2025.
28	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 implementation of any management plans as specified in the conditions. The approval holder must also report against disturbance limits. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of this approval must be provided to the Department at the same time as the compliance report is published.	Part 22 Oct 2024 - 26 Feb 2025	Not applicable	This condition was superseded by Conditions 28, 28A, 28B and 28C of the EPBC Approval dated 27 February 2025 for this reporting period. Refer to responses to those conditions for compliance with annual compliance reporting obligations for the reporting period. For previous reporting periods, Arrow's Annual Compliance Reports complied with the information requirements of this condition and published all Annual Compliance Reports on Arrow's website, where they will remain for the life of the project. Advice of publication was provided to the Department.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
28	Within 60 business days of every 28 February, the approval holder must publish a compliance report on its website for the life of the approval.	Part 27 Feb 2025 - 21 Oct 2025 (wording as per variation dated 10 Nov 2025)	Compliant	This report has been published within the timeframe required by the condition.
28A	The approval holder must ensure each compliance report is completed to the satisfaction of the Minister and is consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.	Part 27 Feb 2025 - 21 Oct 2025	Compliant	This annual compliance report is consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.
28B	The approval holder must ensure each compliance report includes: a. accurate and complete details of compliance and any non-compliance with: i. each condition attached to this approval decision; ii. all commitments made in each plan; and iii. if any incident occurred, each incident; b. one or more shapefile showing all clearing of protected matters, and/or their habitat, undertaken within the 12-month period at the end of which that compliance report is prepared; and c. a schedule of all plans in existence in relation to these conditions and accurate and complete details of how each plan is being implemented.	Part 27 Feb 2025 - 21 Oct 2025	Compliant	This report has been published to provide information required by Condition 28B for the current reporting period. Shapefiles have been provided to the Department.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
28C	The approval holder must: a. notify the department electronically, within 5 business days of the date of publication that a compliance report has been published on the website; b. provide the weblink for the compliance report in the notification to the department; c. keep all published compliance reports required by these conditions on the website until the expiry date of this approval; d. exclude or redact sensitive ecological data from compliance reports published on the website or otherwise provided to a member of the public; and e. if sensitive biodiversity data is excluded or redacted from the published version, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website.	Part 27 Feb 2025 - 21 Oct 2025	Compliant	Advice of publication of this Annual Compliance Report, including a weblink, was provided to the Department within 5 business days of publication. All published Annual Compliance Reports will remain on Arrow's website for the life of the project. Arrow has reviewed this Annual Compliance Report for sensitive ecological data and is comfortable that the information provided does not require to be excluded or redacted.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
28D	Within three months of the commencement of this condition, and within three months of each 12-month anniversary of the commencement of the action for the life of the approval thereafter, the approval holder must lodge an annual report (Annual Well Report) with the department. The Annual Well Report must contain the following information for each well established under this approval: a. a unique identifier for each well; b. geographic coordinates of each well to at least four decimal places of a degree; c. the installation date of the well; d. the production start date of the well; and e. the production end date of the well. If the approval holder becomes aware of any error or omission in the information provided in the Annual Well Report, the approval holder must notify the department in writing within 10 business days of becoming aware of the error or omission, and provide corrected information.	Part 27 Feb 2025 - 21 Oct 2025	Compliant	Arrow submitted the first Annual Well Report on 9 May 2025 within 3 months of the commencement of the condition on 27 February 2025. The report covered the period 22 October 2020 to 27 February 2025. The Annual Well Report covering the period 22 October 2020 to 21 October 2025 was submitted on 21 November 2025 within 3 months of the 12 month anniversary of the commencement of the action.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
29	The approval holder must notify the Department in writing of potential non-compliance with any condition of this approval as soon as practical and no later than ten 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; c. when and how the approval holder became aware of the non-compliance; d. how the non-compliance will affect the approved action; e. 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 MNES; f. the measures the approval holder will take to address the impacts of the non-compliance on the MNES and rectify the non-compliance; and g. the time by when the approval holder will rectify the non-compliance.	Full	Not applicable	There have been no potential or actual non-compliances identified for the current reporting period.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
29A	The approval holder must provide to the department in writing, within 12 business days of becoming aware of an incident, the details of that incident. The approval holder must specify: a. all corrective measures and investigations which the approval holder has already taken in respect of the incident, b. the potential impacts of the incident, c. the method and timing of any corrective measures that the approval holder proposes to undertake to address the incident, and d. any variation of these conditions or revision of a plan that will be required to prevent recurrence of the incident and/or to address its consequences.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	There have been no potential or actual non-compliances identified for the current reporting period.
30	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 independent auditor must be approved by the Minister prior to the commencement of the audit. Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.	Part 22 Oct 2024 - 26 Feb 2025	Not applicable	No directions have been received for the annual reporting period.
30	The approval holder must ensure that an independent audit of compliance with the conditions of approval is conducted for the period: a. date of commencement of the Action (22 October 2020) to 28 May 2024; and b. every subsequent five-year period. A report must be submitted to the Minister every period until this approval expires (unless otherwise specified in writing by the Minister).	Part 27 Feb 2025 - 21 Oct 2025	Compliant	Arrow was directed by the Minister on 31 May 2024 to undertake an independent audit of compliance with the conditions of the EPBC Approval. The audit report, addressing the audit criteria and undertaken by the approved independent auditor, was submitted to the Department on 17 December 2024. The next independent audit is scheduled to occur in 2029.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
30A	For each independent audit, the approval holder must: a. provide the name and qualifications of the nominated independent auditor, the draft audit criteria, and proposed timeframe for submitting the audit report to the department prior to commencing the independent audit; b. only commence the independent audit once the nominated independent auditor, audit criteria and timeframe for submitting the audit report have been approved in writing by the department; c. submit the audit report to the department for approval within the timeframe specified and approved in writing by the department; d. publish each audit report on the website within 20 business days of the date of the department's approval of the audit report; and e. retain every audit report published on the website until this approval expires.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	The first audit required to meet this condition is scheduled to occur in 2029 in accordance with condition 30 as varied in EPBC Approval dated 27 February 2025.
30B	Each audit report must report for the five-year period preceding that audit report.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	Noted. Arrow will undertake 5 yearly audits for the 5 year period preceeding a May anniversary, based upon the first audit that was undertaken in 2024.
30C	Each audit report must be completed to the satisfaction of the Minister and be consistent with the Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines, Commonwealth of Australia 2019.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	The first audit required to meet this condition is scheduled to occur in 2029 in accordance with condition 30 as varied in EPBC Approval dated 27 February 2025.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
30D	The approval holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	Arrow did not apply to vary an action management plan between 27 February 2025 and 21 October 2025.
31	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 revised management plan, that management plan must be implemented in place of the management plan originally approved.	Part 22 Oct 2024 - 26 Feb 2025	Not applicable	During the annual reporting period that this condition was valid for, Arrow submitted a revised version of the approved Stage 1 Offset Strategy for the Minister's approval. The revised Stage 1 Offset Strategy was approved on 27 March 2025.
31	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.	27 Feb 2025 - 21 Oct 2025	Not applicable	Refer to the response to Condition 31 (valid for the reporting period 22 October 2024 to 26 February 2025) above.

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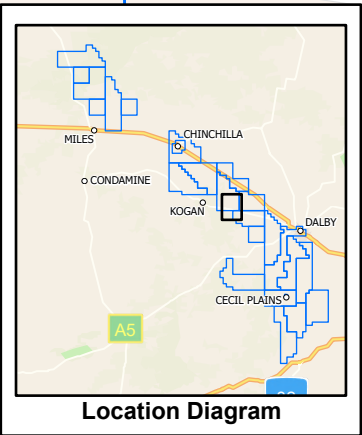
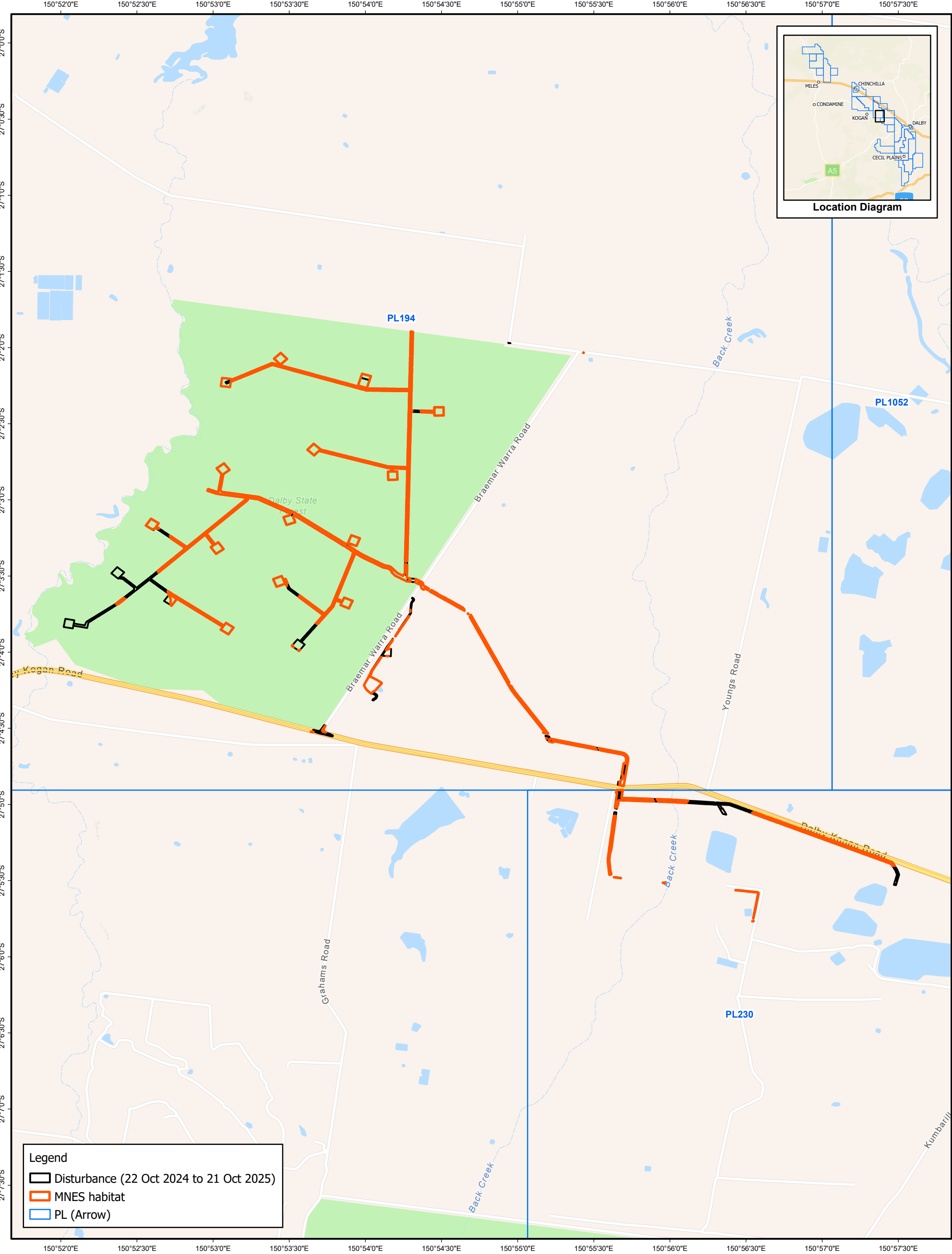
Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
32	If the Minister believes that it is necessary or convenient for the better protection of listed threatened species, listed migratory species or water resources to do so, the Minister may request that 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.	Full	Not applicable	Noted. Arrow has not been requested to make specific revisions to the management plans specified in the conditions.
33	If at any time after seven 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.	Full	Not applicable	The action under the EPBC Approval commenced on 22 October 2020 which was within 7 years of the date of the EPBC Approval.
33A	The approval holder must submit all plans required by these conditions electronically to the department.	Part 27 Feb 2025 - 21 Oct 2025	Compliant	The Stage 2 Offset Strategy was submitted to the Department electronically during this period.
33B	The approval holder must keep all plans required by these conditions published on the website until the expiry date of this approval.	Part 27 Feb 2025 - 21 Oct 2025	Compliant	All approved management plans required by these conditions (as listed in Section 3.2 of this report) have been published on Arrow's website and will remain there until the expiry date of the EPBC Approval.
33C	The approval holder is required to exclude or redact sensitive ecological data from plans published on the website or otherwise provided to a member of the public. If sensitive ecological data is excluded or redacted from a plan, the approval holder must notify the department in writing what exclusions and redactions have been made in the version published on the website.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	Arrow has not identified any sensitive ecological data that is required to be excluded or redacted from a plan.

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Condition	Description	Applies to reporting period	Compliant/non-compliant or not applicable	Comments
34	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 their website. Each management plan must be published on the website within 1 month of being approved and remain available on that website for the life of the approval.	Part 22 Oct 2024 - 26 Feb 2025	Compliant	All approved management plans (as listed in Section 3.2 of this report) have been published on Arrow's website within 1 month of being approved by the Minister.
34	Unless otherwise agreed to in writing by the Minister, the approval holder must publish each management plan referred to in these conditions of approval on the website. Each management plan must be published on the website within 20 business days of the date: a. the plan is approved by the Minister in writing, if the plan requires approval of the Minister; or b. of the approval of this variation, if the version of the plan to be implemented is specified in these conditions.	Part 27 Feb 2025 - 21 Oct 2025	Compliant	The revised Stage 1 Offset Strategy was approved on 27 March 2025 and published on 15 April 2025. The Stage 1 OAMP was approved on 2 June 2025 and published on 6 June 2025. The Stage 2 Offset Strategy was approved on 19 June 2025 and published on 24 June 2025.
34A	Within 20 business days after the completion of the Action, and, in any event, at least 20 business days prior to the expiry date of this approval, the approval holder must notify the department electronically of the date of completion of the Action and provide completion data. The approval holder must submit any spatial data that comprises completion data as a shapefile.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	Noted.
34B	The approval holder must notify the department electronically at least 60, but not more than 70, business days prior to the expiry date of this approval, that the approval is due to expire.	Part 27 Feb 2025 - 21 Oct 2025	Not applicable	Noted.

Appendix B: Figures



Legend

Disturbance (22 Oct 2024 to 21 Oct 2025)

MNES habitat

PL (Arrow)

Based on or contains data provided by the State of Queensland. In consideration of the State permitting use of this data you acknowledge and agree that the State gives no warranty in relation to the data (including accuracy, reliability, completeness, currency or suitability) and accepts no liability (including without limitation, liability in negligence) for any loss, damage or costs (including consequential damage) relating to any use of the data. Data must not be used for direct marketing or be used in breach of the privacy laws

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Source:
Arrow Energy Limited, Qld Gov.

Disclaimer: While all reasonable care has been taken to ensure the information contained on this map is up to date and accurate, no warranty is given that the information contained on this map is free from error or omission. Any reliance placed on such information shall be at the sole risk of the user. Please verify the accuracy of all information prior to using it.

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km

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Scale @ A3:1:41,000

Coordinate System: GCS GDA 1994

arrowenergy

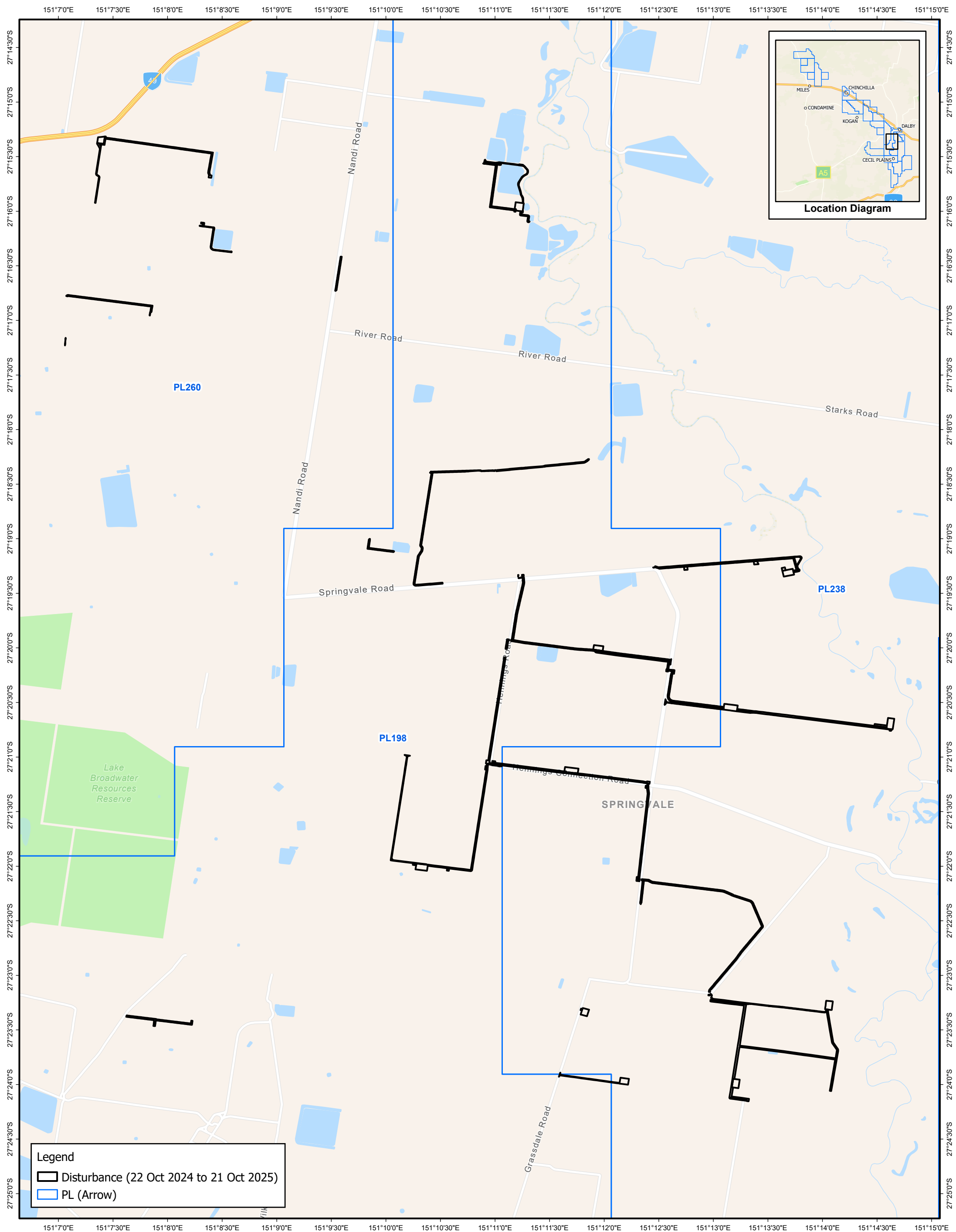
go further

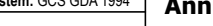
Status: IFU

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Appendix B - Map 2



														Based on or contains data provided by the State of Queensland. In consideration of the State permitting use of this data you acknowledge and agree that the State gives no warranty in relation to the data (including accuracy, reliability, completeness, currency or suitability) and accepts no liability (including without limitation, liability in negligence) for any loss, damage or costs (including consequential damage) relating to any use of the data. Data must not be used for direct marketing or be used in breach of the privacy laws.							Disclaimer: While all reasonable care has been taken to ensure the information contained on this map is up to date and accurate, no warranty is given that the information contained on this map is free from error or omission. Any reliance placed on such information shall be at the sole risk of the user. Please verify the accuracy of all information prior to using it.										Status: IFU			SGP EPBC Approval 2010/5344																					
														© Commonwealth of Australia (Geoscience Australia) year of publication. This material is released under the Creative Commons Attribution 3.0 Australia Licence. <LINK=http://creativecommons.org/licenses/by/3.0/au/><LINK> The dimensions, areas, number of lots, size & location of corridor information are approximate only and may vary.														Scale @ A3:1:56,000			Coordinate System: GCS GDA 1994			Annual Compliance Report 2024/2025																					
																																		Appendix B - Map 3																					
A							20/05/26							First issue							TS							XX							XX							XX							DP						
Rev							Date							Revision Description							Op							Env							Eng							QA							App						