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1 Introduction

Santos GLNG intends to further develop its Queensland gas resources to augment supply of natural gas to its existing and previously approved Gladstone Liquefied Natural Gas (GLNG) Project.

The Santos GLNG Gas Field Development Project (the GFD Project) is an extension of the existing approved gas field development and will involve the construction, operation, decommissioning and rehabilitation of production wells and the associated supporting infrastructure needed to provide additional gas over a project life exceeding 30 years.

Specifically, the GFD Project seeks approval to expand the GLNG Project's gas fields tenure from 6,887 km² to 10,676 km² to develop up to 6,100 production wells beyond the currently authorised 2,650 wells; resulting in a maximum of up to 8,750 production wells. The GFD Project will continue to progressively develop the Arcadia, Fairview, Roma and Scotia gas fields across 35 Santos GLNG petroleum tenures in the Surat and Bowen basins, and associated supporting infrastructure in these tenures and adjacent areas.

This GFD Project will include the following components:

- Production wells
- Fluid injection wells, monitoring bores and potentially underground gas storage wells
- Gas and water gathering lines
- Gas and water transmission pipelines
- Gas compression and treatment facilities
- Water storage and management facilities
- Access roads and tracks
- Accommodation facilities and associated services (e.g. sewage treatment)
- Maintenance facilities, workshops, construction support, warehousing and administration buildings
- Utilities such as water and power generation and supply (overhead and/or underground)
- Laydown, stockpile and storage areas
- Borrow pits and quarries
- Communications.

The final number, size and location of the components will be determined progressively over the GFD Project life and will be influenced by the location, size and quality of the gas resources identified through ongoing field development planning processes, which include consideration of land access agreements negotiated with landholders, and environmental and cultural heritage values.

Where practicable, the GFD Project will utilise existing or already approved infrastructure (e.g. accommodation camps, gas compression and water management facilities) from the GLNG Project or other separately approved developments. The GFD Project may also involve sourcing gas from third-party suppliers, as well as the sharing or co-location of gas field and associated facilities with third parties.

Approved exploration and appraisal activities are currently underway across the GFD Project's petroleum tenures to improve understanding of the available gas resources. As the understanding of gas resources increases, investment decisions will be made about the scale, location and timing of the next stages of field development.
2 Regulation

Landholders are afforded certain rights and obligations under the:

- Petroleum and Gas (Production and Safety) Act 2004 (Qld) (P&G Act)
- Petroleum Act 1923 (Qld) (Petroleum Act)
- Regional Planning Interest Act 2014 (Qld).

The legislation requires that resource companies (including Santos GLNG) comply with the Land Access Code (Department of Employment, Economic Development and Innovation, 2010) when gaining agreement to conduct petroleum activities on another party’s land.

3 Purpose

Santos Ltd is an Australian oil and gas company, which has been working in and around the Maranoa Region for more than 50 years. The company’s growth into one of the country’s largest producers of natural gas has been based on the acknowledgement that the coexistence of petroleum rights with the property rights of landholders requires careful management. The relationships with landholders form the foundation from which Santos conducts business. Santos GLNG is a joint venture between Santos Limited, PETRONAS, Total, and KOGAS. Santos Ltd is the operator of the Santos GLNG project, which will include the GFD Project.

Land access is critical to the successful development and production of gas resources. Interaction with landholders occurs throughout field development – including exploration, operations, and rehabilitation and decommissioning. Santos GLNG seeks to establish long term partnerships with landholders within areas that their petroleum activities are undertaken.

The majority of the majority of wells and gathering lines and access tracks will be located on private land and completed in accordance with the requirements of the Land Access Code (Department of Employment, Economic Development and Innovation, 2010). Large scale field infrastructure (such as hub compressors, lay-down areas, worker accommodation facilities) will be most likely on land that is acquired by Santos GLNG.

The purpose of this Land Access and Landholder Engagement Strategy is to detail management frameworks and business processes for securing and maintaining legal, ethical and sustainable land access with landholders for the life of the Santos GLNG project.

This supports Santos GLNG’s overarching vision for community engagement which is:

‘We work to be a valued member of the communities of which we are a part.’
4 Objectives

The key objectives underpinning Santos GLNG’s approach to land access are detailed below.

4.1 Delivering business objectives

Land access is achieved in a manner that complies with all relevant legal requirements to enable the business objectives to be delivered.

4.2 Being a good neighbour

By securing access to and developing infrastructure on land owned and farmed or managed by another party, a critical relationship is created. Santos GLNG conducts its activities in accordance with good neighbour principles such as:

- Being approachable, honest and accountable
- Acting professionally
- Caring for the environment and the community
- Understanding and acknowledging local cultures, custom and tradition.

Santos GLNG aims to demonstrate a high regard for the welfare and wellbeing of landholders and their business at all times.

4.3 Being a valued member of the community

Santos GLNG continually strives to earn its social licence to operate by embedding four key principles into its engagement philosophy:

- Information and communication – we will provide timely, factual and relevant information through a variety of accessible communication channels
- Community engagement and participation – we will provide opportunities for community participation, input and feedback
- Actions align with values – we will do what we say we will do
- Mitigate and manage impacts – we will minimise our impacts on regional communities.

5 Santos GLNG Project landholder context

Santos GLNG has achieved land access through the development of good relations with the landholder community.

Existing gas field operations in the Surat and Bowen Basins around Roma and Fairview have allowed Santos GLNG to develop strong relationships with many landholders in these districts. The region has historically had a strong rural industry base, with grazing, and to a lesser extent cropping, being the predominant land use. Exploration and gas production activities are currently being undertaken in the Scotia, Roma and Fairview gas fields. Exploration activities are being undertaken in the Arcadia gas field.
5.1 Scotia
Santos Ltd began exploration of the Scotia gas field in 1996 and commenced production in 2002. The Scotia areas agricultural economy is based on beef and grain production. The eastern parts of the Scotia gas field generally contain smaller agricultural land parcels with more intensive cropping than the western portion.

More recently, significant development projects have been proposed for the area including the Nathan Dam, Wandoan Coal Mine, Surat Basin Rail, which would link Wandoan to Moura and Gladstone. While these projects remain a possibility there is uncertainty around the development of these projects. The area south of the Scotia gas field is already seen significant construction activity associated with the development of QCLNG and APLNG project tenures to the south and southwest of Wandoan.

5.2 Roma
The Roma area was initially developed over 50 years by Santos Ltd as a conventional gas field. The shallower coals in the area are now being developed for coal seam gas. The Roma gas field area is generally comprised of small to medium scale agricultural holdings concentrated on beef cattle production and dryland cropping. The town of Roma is the primary regional centre within Santos GLNG’s area of operations for the GLNG Project. The agricultural community in and around Roma is close knit, often with many generations of families working and managing the properties.

5.3 Fairview
Santos Ltd purchased the petroleum tenures associated with the Fairview gas field in 2005. The Fairview gas field area comprises a number of medium to large scale grazing (beef cattle) concerns north east of Injune and west of Taroom. There are many family properties in the area and succession for future generations is an important principal. Santos GLNG owns three properties that are the focal point of the Fairview gas field activities.

5.4 Arcadia
Santos Ltd purchased the tenures associated with the Arcadia gas field in 2005. The Arcadia gas field area consists of properties that were settled in the early 1960’s under the Queensland Government’s Brigalow Scheme. Many of the original ballot winners remain on the properties with family succession plans intended. Land use in the Arcadia gas field is predominantly focussed on beef cattle production. The Arcadia Valley community is vibrant and strongly connected, in part due to its distance from regional centres.

6 Landholder engagement
The responsible officers within Santos GLNG for land access are called Landholder Advisors. Landholder Advisors must comply with the Rules of Conduct as stipulated in Appendix A.

The approach of Santos GLNG to land access has been to work within a five stage approach to land access to establish an enduring partnership with the landholders within the areas of proposed operation. Though out all stages below Landholder Advisors maintain regular contact with landholders to ensure comprehensive sharing of information about activities.
6.1 Stage 1 Early Engagement

Santos GLNG conducts Early Engagement to give landholders the resources to become business partners with Santos GLNG in advance of any gas activity on their land. The objective during Early Engagement phase is to introduce Santos GLNG and provide information to landholders about gas activities.

The engagement will be via a series of meetings with effected Landholders over a 6 to 12 month period. The extended engagement invites landholders to research the accuracy of key points between meetings.

Additional Early Engagement activities include:

- Allocate Landholder Adviser
- Explain gas development process from exploration to production
- Provide landholders with access to technical advice
- Undertake property mapping
- Undertake tours of existing gas activities in other areas
- Explain Santos GLNG compensation methodology
- Discuss and develop further the Rules of Conduct.

6.2 Stage 2 Pre-planning and desktop review

For each petroleum activity proposed for a landholder’s property, Santos GLNG will perform planning prior to formal agreement.

During this process, geologists and geoscientists assess a range of data including aerial photography, topographic mapping and seismic research in an effort to determine the most appropriate well locations.

This information is then used to develop the locations of wells and supporting infrastructure, taking into account constraints. The development proposal takes into account issues including:

- Current agricultural land use
- Avoiding smaller land parcels where the relative impact will be greater
- Where possible co-locating pipelines, power lines and access roads along fence lines and property boundaries or appropriate topographical features
- Locating development activities away from the more intensively used areas of the property.

This process is designed to develop a land access proposal that is targeted around known or reasonably foreseeable constraints.

6.3 Stage 3 Land access proposal and landholder agreement

This stage is the formal engagement with land holders including presentation of the land access proposal, discussion and negotiations and development of the Conduct and Compensation Agreement.

By this point, as a result of early engagement and pre-planning, the landholder should have an understanding of the proposed activities – including reason for activity, how it will be conducted (duration and stages), how the area will be left at end of activity and an indication as to the amount of compensation available.

Throughout this stage, Santos GLNG will work in collaboration with landholders to locate infrastructure in areas that facilitate effective coexistence of Santos GLNG’s operations and the landholder.
Delivering the land access proposal will require field based inspections of proposed sites with landholders to discuss and agree on:

- General site location
- Site design including practises to minimise the extent of land required
- How the site will be accessed from the nearest local road
- How property operations are likely to be impacted and appropriate mitigation works including road maintenance and dust management
- A rehabilitation plan for the site once intensive activity has diminished
- How Santos GLNG and its contractors will conduct themselves on the property.

If the land access proposal is viewed to be acceptable to both parties, it is turned into the formal Conduct and Compensation Agreement. When landholders are initially provided with a Santos GLNG Conduct and Compensation Agreement, the Landholder Advisor will explain the terms of the document and how it relates to the site and activity that has been negotiated.

The Rules of Conduct can have property specific details and form part of the standard Santos GLNG Conduct and Compensation Agreement.

The landholder has the opportunity to seek legal review of the document and Santos GLNG will meet the reasonable costs associated with such review.

### 6.4 Stage 5 Construction and operation activity

The objective of this stage is to monitor and oversee Santos GLNG’s activities and ensure compliance with the Rules of Conduct and Conduct and Compensation Agreement, this is monitored and audited through the Santos GLNG Site Permit Request system.

This is achieved through:

- Allocation of dedicated Field Advisor for each Landholder
- Onsite visits by Field Advisor during high activity period
- Management of disturbance issues / complaints
- Proactive auditing program of compliance with the Rules of Conduct.

### 6.5 Stage 6 Rehabilitation activity

The objective of this stage is to ensure that timely rehabilitation of sites occurs where appropriate, compliance obligations are fulfilled, and ongoing relationship is maintained.

This is achieved through:

- Coordination, planning and monitoring of site rehabilitation works
- Administration of compensation payments
- Regular liaison with landholders regarding ongoing operation of facilities and the progress of rehabilitation.
## 7 Compensation

The framework for compensating landholders for the effects of petroleum activities on their land is outlined in legislation. Any person who owns or formally occupies land is entitled to compensation for the following effects of petroleum activities:

- Deprivation of possession of its surface
- Diminution of its value
- Diminution of the use made, or that may be made, of the land or any improvement on it
- Severance of any part of the land from other parts of the land or from other land that the eligible claimant owns
- Any cost or loss arising from the carrying out of activities under the petroleum authority on the land.

Santos GLNG employs a standard compensation framework for individual activity types that ensures parity and equity of treatment amongst all landholders within petroleum tenures.

The compensation framework operates under the principle of a single amount that provides compensation for impacts relating to the five effects detailed above.

To date, existing landholder partners have found that the Santos GLNG schedule of compensation provides equitable and effective compensation for potential impacts. In the event that a compensation offer is disputed, an independent expert opinion can be secured.

## 8 Land acquisition

Depending on the nature of activity planned for a landholder’s property, circumstances may arise where it is important for Santos GLNG to acquire that property.

This may be for reasons relating to benefits achieved through the concentration of infrastructure in a central location or to establish large-scale field infrastructure in close proximity to the work front (such as hub compressors, inventory warehouses/lay-down areas, air strips and worker accommodation facilities).

Landholders are under no obligation to sell and may not wish to do so. If there is to be an independent valuation, valuation instructions will be prepared jointly between Santos GLNG and the landholder.

## 9 Complaints management

Santos GLNG has a grievance management process in place for the GLNG Project and seeks to resolving issues quickly, efficiently and to the satisfaction of the complainant. Santos GLNG actively monitors grievances to ensure their timely resolution. All grievances are reported to the business via monthly management information reports.
10 Compliance

Santos GLNG operates with a suite of standard documentation that complies with regulatory requirements. These standard agreements provide guidance on issues including indemnities, compensation framework, and the extent and conduct of activities on a particular site.

11 Information security

Santos GLNG will at all times keep landholder information confidential.
Appendix A  Rules of conduct

This *Land Access Rules of Conduct* applies to any person representing Santos GLNG or undertaking Santos GLNG business, who accesses land owned or controlled by another party for the purposes of carrying out Petroleum Operations.

**Rules of Conduct**

The primary document governing the behaviour by those entering private property for Petroleum Activities is the *Land Access Code* (Department of Employment, Economic Development and Innovation, 2010). In addition, all activities associated with the Santos GLNG project are subject to these Rules of Conduct.

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<table>
<thead>
<tr>
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<tbody>
<tr>
<td><strong>1. Vehicles</strong></td>
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</tr>
<tr>
<td>a.</td>
<td>Vehicles will use approved, agreed-upon paths of entry access roads, tracks, designated work areas of set-down areas</td>
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<tr>
<td>b.</td>
<td>Driving to be conducted to suit the prevailing conditions and to minimise noise and dust</td>
</tr>
<tr>
<td>c.</td>
<td>Vehicles will give way to livestock</td>
</tr>
<tr>
<td>d.</td>
<td>Any injury or killing of livestock will be reported as soon as reasonably practicable</td>
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<tr>
<td>e.</td>
<td>In wet conditions, vehicle movements must be minimised to essential traffic and minimise damage to access points, roads and tracks</td>
</tr>
<tr>
<td>f.</td>
<td>Vehicles driven by or carrying landholders and their families, personal visitors, employees and contractors have right of way over Santos project-related traffic.</td>
</tr>
<tr>
<td><strong>2. Dust</strong></td>
<td></td>
</tr>
<tr>
<td>a.</td>
<td>Activities will have procedures in place to control dust impacts.</td>
</tr>
<tr>
<td><strong>3. Fire</strong></td>
<td></td>
</tr>
<tr>
<td>a.</td>
<td>Appropriate fire management procedures will be in place when undertaking activities</td>
</tr>
<tr>
<td>b.</td>
<td>No smoking except in designated areas.</td>
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<td><strong>4. Livestock</strong></td>
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<tr>
<td>a.</td>
<td>Where practicable, activities will be conducted with minimal disturbance to livestock.</td>
</tr>
<tr>
<td><strong>5. Environment</strong></td>
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<tr>
<td>a.</td>
<td>Weed management procedures will be use when undertaking activities</td>
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<td>b.</td>
<td>All vehicles must hold current washdown certifications and/or up-to-date weed hygiene declarations</td>
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<tr>
<td>c.</td>
<td>All rubbish must be disposed of in designated receptacles and removed from the property.</td>
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<tr>
<td><strong>6. Infrastructure</strong></td>
<td></td>
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<tr>
<td>a.</td>
<td>Gates must be left in the position found, unless the landholder advises otherwise</td>
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<tr>
<td>b.</td>
<td>No modifications are to be made to gates, fences, grids, roads or tracks without the landholder’s consent</td>
</tr>
<tr>
<td>c.</td>
<td>Damage to the landholder’s infrastructure must be reported as soon as reasonable practicable</td>
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<tr>
<td>d.</td>
<td>Landholder infrastructure is off-limits, unless access has been granted by the landholder.</td>
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<tr>
<td><strong>7. Other</strong></td>
<td></td>
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</tbody>
</table>
## Appendix B  Land access process

### Preparation of Conduct and Compensation Agreement (POCCA) Form

<table>
<thead>
<tr>
<th>Document Prepared by:</th>
<th>Date of Preparation:</th>
</tr>
</thead>
</table>

#### 1. Planned Petroleum Activities
- **Scout date:**

#### 2. Landholder Details
- **Landholder Name(s) on Title**
- **Indicate main contact if applicable**
- **Property Name and Address**
- **Lot(s) and Plan(s)**
- **Postal Address**
- **Email Address**
- **Home Phone**
- **Mobile Phone**

#### 3. Payment Details
- **Payment Method:** CHEQUE / EFT (circle or delete one)
- **Payee Details**
- **Payee ABN**
- **Registered for GST?** YES / NO (circle or delete one)
- **Account Name**
- **Bank**
- **BSB**
- **Account Number**

#### 4. Occupier
- **Is there an occupier(s) on the property?** YES / NO (circle or delete one)
- **If the activities will impact on the occupier’s use of the land, how is the compensation to be apportioned between the Landholder and the Occupier?**
  - All to Landholder / All to Occupier / Split between Landholder and Occupier (circle or delete as appropriate)
- **Please provide details:**
  - **Occuier Name(s)**
  - **Postal Address**
  - **Email Address**
  - **Home Phone**
  - **Mobile Phone**
### 5. Behaviours

Review the existing **Rules of Conduct** (see last page) with the Landholder and explain how Santos achieves the outcomes that are set out in the rules.

**Are there any property access rules or behaviours that the Landholder requires in addition to those set out in the Rules of Conduct?**

*Please note which section is applicable i.e. “1. Vehicles – unlicensed drivers on roads before and after school”.*

<table>
<thead>
<tr>
<th>Additional works / other matters</th>
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<tbody>
<tr>
<td>Organic Status</td>
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<tr>
<td><strong>Is the property certified as organic?</strong></td>
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<td><strong>Please provide details:</strong></td>
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<thead>
<tr>
<th>Gravel</th>
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<tbody>
<tr>
<td><strong>Is there gravel available at the property?</strong></td>
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<tr>
<td><strong>Is stockpiled gravel available?</strong></td>
</tr>
<tr>
<td><strong>Price agreed with Landholder (ex GST)</strong></td>
</tr>
<tr>
<td><strong>Stockpiled</strong></td>
</tr>
<tr>
<td><strong>Un-stockpiled</strong></td>
</tr>
<tr>
<td><strong>Is there a quantity limit?</strong></td>
</tr>
<tr>
<td><strong>If yes, please provide details:</strong></td>
</tr>
<tr>
<td><strong>Approximate GPS location(s)</strong></td>
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<table>
<thead>
<tr>
<th>Water</th>
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<tbody>
<tr>
<td><strong>Is surface run-off dam water available for use at the property?</strong></td>
</tr>
<tr>
<td><strong>Price agreed with Landholder (ex GST)</strong></td>
</tr>
<tr>
<td><strong>Is there a quantity limit?</strong></td>
</tr>
<tr>
<td><strong>If yes, please provide details:</strong></td>
</tr>
<tr>
<td><strong>Approximate GPS location(s)</strong></td>
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