

25 March 2025

**Clean Energy Regulator**

GPO Box 621  
Canberra ACT 2601  
Australia

Dear Clean Energy Regulator

**Re: Statement for Darwin LNG Plant under Section 72C of the Safeguard Rule**

We refer to section 72C of the *National Greenhouse and Energy Reporting (Safeguard Mechanism) Rule 2015 (Safeguard Rule)*, which requires a written explanation when surrendering ACCUs equal to or greater than 30 per cent of the baseline emissions number (**Safeguard Baseline**) for the facility for the period.

For the FY 2023-2024 reporting period Darwin LNG Plant (DLNG) will be surrendering ACCUs to manage the facility's Safeguard Baseline exceedance. This is because DLNG ceased producing LNG in November 2023 as production from the Bayu-Undan gas field that supplied natural gas to the plant materially declined. The volume of gas processed at the plant from July to November 2023 was significantly below plant capacity due to this decline in production. Therefore, the emissions intensity at the plant for this period was negatively impacted.

Since the cessation of LNG production at DLNG, modifications and refurbishment of the plant have been undertaken during the Darwin life extension project. Operational and emissions efficiency is expected to be enhanced by implementing technologies such as Automated Process Control to optimise tuning processes in the plant.

The facility is expected to restart LNG production operations in the FY 2025-26 compliance year to process natural gas from the Barossa field. Once Barossa gas processing at DLNG is online, opportunities for further carbon abatement will be reviewed for future production years. Potential Carbon Capture and Storage (CCS) developments such as the Bayu Undan CCS project are being explored, noting that such projects require regulatory frameworks, policies and government approvals to be in place.

Yours sincerely



Amelia Senneck  
**Company Secretary, Santos Ltd**