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Mr Andreas Blahous
Executive Director, Reset Coordination and Strategy
Australian Energy Regulator
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Stakeholder consultation on Amadeus Gas Pipeline 2026-31 Access Arrangement Proposal

Dear Mr Blahous,

Tamboran Resources Corporation ('Tamboran') welcomes the opportunity to provide feedback on the AER's Draft Decision regarding the Amadeus Gas Pipeline (AGP) 2026–31 Access Arrangement. We acknowledge the AER's decision to defer approval of the proposed gas specification changes to allow further consultation and welcome the chance to contribute to this process.

Tamboran is a growth-driven independent natural gas exploration and production company focused on developing the Beetaloo Basin in the Northern Territory. The Beetaloo Basin is recognised as one of Australia's most significant undeveloped gas resources, with the potential to supply domestic markets and LNG export facilities for decades. Tamboran's strategy is built on an integrated approach to the commercial development of low carbon dioxide natural gas resources in the Beetaloo Basin. Together with our joint venture partners we hold exploration permits ('EPs') for approximately 4.7 million contiguous gross acres (approximately 1.9 million net acres to Tamboran) and Tamboran is currently the largest acreage holder in the Beetaloo.

Tamboran is making this submission because the proposed changes to the Amadeus Gas Pipeline (AGP) gas specification are critical to enabling Beetaloo gas to be transported efficiently into the AGP and, ultimately, to the East Coast market. Without these changes, particularly adjustments to the liquids specifications, significant volumes of gas could face unnecessary processing or be stranded, undermining the economic viability of Beetaloo gas projects and delaying urgently needed new gas supply for the Northern Territory.

Tamboran has recently reached Final Investment Decision (FID) on its Shenandoah South Pilot Project, targeting first gas by mid-2026. This project includes:

- A binding Gas Sales Agreement with the Northern Territory Government for 40 TJ/day of supply through 2041.
- Construction of the Sturt Plateau Pipeline and Compression Facility, connecting Beetaloo gas to the AGP for delivery into NT and East Coast markets.

Under this Gas Sales Agreement Tamboran will supply gas that complies with the Australian standard AS4564, and as such it is suitable for all customers across the east coast gas grid. Aligning AGP specifications with AS4564 and accommodating Beetaloo gas composition is therefore essential to achieving these objectives and supporting the National Gas Objective.



Background: Tamboran Resources and the Beetaloo Basin

The Beetaloo Basin, located approximately 600 km southeast of Darwin, is widely regarded as one of Australia's most promising unconventional gas resources. Covering around 28,000 square kilometres, it contains vast shale formations such as the Mid Velkerri B Shale, which geologists compare to North America's prolific Marcellus Shale. The NT government estimates the basin has 500 trillion cubic feet of gas in place, enough to meet domestic demand for decades and supply LNG export markets.

The basin's development is strategically important for Australia's energy security. The Australian Competition and Consumer Commission (ACCC) has forecast potential gas shortfalls on the East Coast as early as 2028, making Beetaloo a critical new supply source. Its proximity to Darwin and existing pipeline connections, such as the AGP and Northern Gas Pipeline (NGP), provide pathways to both the Northern Territory and East Coast gas markets where demand for gas remain strong.

Context and Rationale for Gas Specification Change

The proposed adjustment to the AGP gas specification is intended to accommodate gas from the Beetaloo Basin, which is expected to become a significant contributor to NT supply. Current AGP specifications create unnecessary constraints that could impede the reliable injection of Beetaloo gas into the AGP.

While the proposed changes are modest, they are strategically important. They will:

- Facilitate integration of new supply sources without costly processing.
- Reduce reliance on nitrogen removal services where not technically necessary.
- Support long-term energy security and affordability by improving east coast connectivity.

Tamboran's primary objective in this process is to ensure that the AGP specification is expanded to incorporate the AS4564 definition for glycols and liquids. This change is essential to enable reliable injection of Beetaloo gas without unnecessary processing constraints. While we support the other proposed changes to align the AGP gas specification with AS4564, such as adjustments to HHV and Wobbe Index, our priority is to amend the glycols/liquids specification to align with AS4564.

Contractual Consistency and Consumer Impact

Concerns have been raised about potential misalignment with downstream contracts and impacts on end-use appliances, however, these risks are minimal and largely theoretical. Most domestic gas appliances are designed to operate safely across a Wobbe Index range of approximately 40–60 MJ/Sm³, meaning a small variation, such as an increase from 51 to 52 MJ/Sm³, is highly unlikely to affect performance or require adjustment. The probability of Northern Territory gas reaching the upper end of this range is also low, with Beetaloo gas samples consistently showing Wobbe values of 46–47 MJ/Sm³, well within the safe operating band.

Similar variations already occur under the current specification, and there is little evidence of adverse impacts. Where gas remains within AS4564 parameters and no operational or safety concerns arise, counterparties have limited incentive to enforce legacy specifications. Historical precedent demonstrates that such changes can be managed through standard contractual variation processes without material disruption.



Another practical demonstration of the compatibility of AS4564 spec gas with AGP service occurred recently when the Northern Gas Pipeline (NGP) commenced reverse flow. Following infrastructure upgrades completed mid-2025, the NGP began delivering east-coast-specified gas (consistent with AS4564) from Queensland into the Northern Territory on 16 December 2025. This east-to-west flow delivered gas from the NGP directly into the AGP, validating in real-world conditions that AS4564 compliant gas can be introduced without operational, contractual, or consumer-level complications.

Operational and Safety Considerations

Safety remains paramount, and the proposed changes do not introduce any new risks. The adjustments to the Higher Heating Value (HHV) and Wobbe Index are incremental and consistent with specifications already widely adopted across the east coast market. In addition, existing gas quality monitoring and curtailment provisions under the AGP Access Arrangement will continue to apply, ensuring compliance and maintaining operational integrity.

Interaction with Downstream Processing

It has been suggested that increasing the Higher Heating Value (HHV) and Wobbe Index without reducing inert gas limits could create challenges for downstream processing. In practice, this risk is highly theoretical. To exceed AS4564 HHV limits after nitrogen removal, the gas would need to contain unusually high concentrations of heavier hydrocarbons, such as more than 15% ethane and 4% propane, which is extremely unlikely given the long history of actual composition information for all existing Northern Territory gas production. Any minor adjustments required in nitrogen removal processes are operational matters that can be managed within existing frameworks.

It is worth noting that this is not a new issue, the same theoretical risk already exists under current specifications. Gas from Tamboran is lean, with ethane content of around 2.5% and propane content of around 0.2%, and any proposed changes to HHV will not impact our operations.

Implementation and Transition

We acknowledge that contractual and operational adjustments require careful planning, and we support a structured approach to implementation. A phased rollout will allow stakeholders sufficient time to review and adapt, while ongoing engagement with shippers, downstream users, and regulators will ensure clarity and minimise disruption. Where necessary, transitional arrangements can be considered to address any residual contractual issues and provide confidence across the supply chain.

Conclusion

The proposed gas specification changes are modest, safe, technically sound, and aligned with broader market objectives. They will enable the efficient transport of Beetaloo gas, reduce unnecessary processing costs, and support the long-term interests of consumers by improving supply diversity and affordability.



We encourage the AER to approve the changes in the final decision, subject to any transitional measures deemed appropriate, and we remain committed to working collaboratively with all stakeholders to ensure a smooth and safe implementation.

We welcome further engagement on these matters and would be pleased to discuss our recommendations in more detail.

Yours sincerely



Mike Flynn
Executive Vice President, Gas Markets
Tamboran Resources Corporation