

Form 604

Corporations Act 2001
Section 671B

Notice of change of interests of substantial holder

To Company Name/Scheme Santos Ltd

ACN/ARSN _____

1. Details of substantial holder (1)

Name Wellington Management Company, LLP ("Wellington Management")

ACN (if applicable) N/A

There was a change in the interest of the 13/09/2005
substantial holder on

The previous notice was give to the 11/07/2005
company on

The previous notice was dated 11/07/2005

2. Previous and present voting power

The total number of votes attached to all the voting shares in the company or voting interests in the substantial holder or an associate (2) had a relevant interest (3) in when last required, and when now required, to give a substantial holding notice to the company or scheme are as follows:

Class of securities (4)	Previous notice		Present notice	
	Person's votes	Voting power (5)	Person's votes	Voting Power (5)
Ordinary Shares	42,530,754	7.21	48,577,765	8.21

3. Changes in relevant interests

Particulars of each change in, or change in the nature of, a relevant interest of the substantial holder or an associate in voting securities of the company or scheme, since the substantial holding notice to the company or scheme are as follows:

Date of change	Person whose relevant interest changed	Nature of change (6)	Consideration give in relation to change (7)	Class and number of securities affected	Person's votes affected
See Exhibit B	Wellington Management	Purchase	See Exhibit B	Ordinary Shares See Exhibit B	See Exhibit B

4. **Present relevant interests**

Particulars of each relevant interest of the substantial holder in voting securities after the change are as follows

Holder of relevant interest	Registered holder of securities	Person entitled to be registered as holder (8)	Nature of relevant interest (6)	Class and number of securities	Person's votes
Wellington Management	Unknown	Unknown	investment/voting authority (see example agreement attached as Exhibit A) in respect of the ordinary shares issued and allotted pursuant to the Scheme of Arrangement approved by the Supreme Court of South Australia on 21 June 2002	Ordinary Shares- 48,577,765	8.21

5. **Changes in association**

The consideration paid for each relevant interest referred to in paragraph 3 above, and acquired in the 4 months prior to the day that the substantial holder became a substantial holder is as follows:

Name and ACN/ARSN (if applicable)	Nature of association
Not Applicable	

6. **Addresses**

The addresses of persons named in this form are as follows:

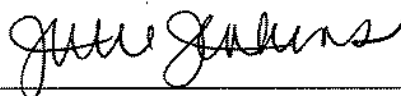
Name	Address
Wellington Management Company, LLP	75 State Street, Boston, MA 02109, USA

Signature

print name Julie A. Jenkins

capacity Vice President and Counsel

sign here



date 15/09/2005

EXHIBIT A

Wellington Management Company, LLP ("Wellington Management") Investment Management Agreement

Appointment of Wellington Management as Manager/ Acceptance of Appointment	The Clients hereby appoint Wellington Management as investment manager to manage, supervise and direct the Clients' investment account or accounts (collectively, the "Account") under the terms and conditions set forth in the Agreement. By execution of the Agreement, Wellington Management accepts appointment as investment manager and agrees to manage, supervise and direct the investments of the Account pursuant to the provisions of the Agreement.
Discretionary Authority - Investments	Wellington Management shall have full and complete discretion to manage, supervise and direct the investment and reinvestment of assets in the Account and any additions thereto, subject to the investment objectives and guidelines attached to the Agreement. Wellington Management shall have full power and authority to act on behalf of the Account with respect to the purchase, sale, exchange, conversion or other transactions in any and all stocks, bonds, cash held for investment, and other assets, including shares of a registered investment company for which Wellington Management may act as investment adviser and, upon proper authorization by the Clients, interests in a collective trust maintained by a bank or trust company, including one maintained by an affiliate of Wellington Management. No cash or securities due to or held for the Account shall be paid or delivered to Wellington Management, except in payment of the management fee payable to Wellington Management under the Agreements pursuant to procedures approved by the Clients.

Exhibit B
Wellington Management Company, LLP
Substantial Shareholder Interest in Ordinary Shares of Santos Ltd.

Date	Transaction	Shares	Price	Market Value
07/11/2005	Purchase	326,484	10.89	3,566,745
07/12/2005	Sale	-67,929	10.94	-742,763
07/13/2005	Purchase	241,107	11.04	2,664,841
07/14/2005	Purchase	152,071	10.94	1,668,793
07/15/2005	Purchase	6,867	10.80	74,190
07/18/2005	Purchase	97,900	10.81	1,058,199
07/20/2005	Purchase	58,276	10.89	634,714
07/21/2005	Purchase	1,831,228	10.83	19,500,098
07/22/2005	Purchase	57,675	11.21	646,492
07/25/2005	Purchase	488,972	11.24	5,507,923
07/26/2005	Purchase	584,982	11.23	6,548,374
07/27/2004	Sale	-46,304	11.14	-518,561
07/29/2005	Sale	-12,281	10.95	-132,222
08/01/2005	Purchase	5,272	10.69	56,377
08/02/2005	Purchase	71,476	10.93	799,760
08/03/2005	Purchase	90,928	11.14	1,015,681
08/04/2005	Purchase	32,103	10.93	351,150
08/05/2005	Sale	-6,053	10.83	-65,359
08/08/2005	Purchase	49,543	10.93	542,563
08/10/2005	Sale	-4,367	11.32	-49,508
08/11/2005	Purchase	1,000	11.44	11,444
08/12/2005	Purchase	308,538	11.34	3,505,911
08/15/2005	Purchase	126	11.14	1,404
08/17/2005	Purchase	163,333	11.01	1,798,828
08/18/2005	Purchase	8,119	10.87	88,284
08/23/2005	Purchase	937	11.16	10,461
08/24/2005	Sale	-157,417	10.90	-1,708,388
08/25/2005	Purchase	11,249	10.99	124,690
08/26/2005	Purchase	3,385	11.29	38,230
08/29/2005	Purchase	389,376	11.83	4,621,488
08/30/2005	Purchase	520,162	11.61	6,053,325
08/31/2005	Purchase	2,641	11.55	30,513
09/01/2005	Purchase	68,705	11.62	799,736
09/02/2005	Purchase	746	11.63	8,679
09/05/2005	Purchase	1,479	11.51	17,029
09/07/2005	Purchase	47,346	11.05	402,058
09/08/2005	Purchase	31,564	11.04	348,626
09/09/2005	Purchase	390,000	10.99	4,296,470
09/12/2005	Purchase	262,000	11.11	2,915,329
09/13/2005	Purchase	35,772	11.04	395,421