

# Annual Environmental Performance Report

*26/09/2022 – 25/09/2023*

*Imperial Oil and Gas Pty Ltd*

*2D Seismic Work Program EP187 (IMP1-3)*

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<b>Document title</b>	Annual Environmental Performance Report
<b>EMP title</b>	2D Seismic Work Program EP187 (IMP1-3)
<b>Exploration Permit/Licence Number</b>	Exploration Permit 187
<b>Interest holder details</b>	Imperial Oil & Gas Pty Limited Level 5, 6-10 O'Connell Street Sydney NSW 2000 ABN 92002699578
<b>Operator details</b>	Imperial Oil & Gas Pty Limited

<b>Signature and Certification</b>	
I certify on behalf of Imperial Oil & Gas Pty Ltd this document is a true and accurate record of performance.	
Signature	
Position	<b>Chief Financial Officer</b>
Date	<b>30 November 2023</b>

<b>Acronyms / Terms</b>	<b>Definition</b>
AEPR	Annual Environment Performance Report
Code	Code of Practice: Onshore Petroleum Activities in the Northern Territory
DEPWS	Department of Environment, Parks and Water Security (NT)
DITT	Department of Industry, Tourism and Trade (NT)
EMP	Environment Management Plan
EP	Exploration Permit
NT	Northern Territory
Regulations	Petroleum (Environment) Regulations 2016 (NT)

## Contents

1. Introduction .....	4
1.1. Background.....	6
1.2. Contents of performance report.....	7
1.3. Assessment of performance .....	7
1.4. Evidence of performance .....	7
2. Demonstration of Performance.....	8
3. Overall Performance .....	28
3.1. Overview of performance .....	28
3.2. Overview of non-compliant items .....	28
3.2.1. Regulatory reporting .....	28
3.2.1.1. Description .....	28
3.2.1.2. Analysis of potential environmental harm or impact.....	28
3.2.1.3. Corrective actions.....	28
3.2.2. Environmental monitoring .....	29
3.2.2.1. Description .....	29
3.2.2.2. Analysis of potential environmental harm or impact.....	29
3.2.2.3. Corrective actions.....	29
3.3. Application of lessons learnt.....	29

## Tables

<b>Table 1. Timing of Regulated Activities .....</b>	<b>5</b>
<b>Table 2: Performance Descriptors .....</b>	<b>7</b>
<b>Table 3: Compliance with Ministerial EMP Approval Conditions.....</b>	<b>8</b>
<b>Table 4: Compliance with Environmental Outcomes and Environmental Performance Standards.....</b>	<b>10</b>
<b>Table 5: Compliance with Reporting and Monitoring Requirements.....</b>	<b>19</b>
<b>Table 6: Performance Summary .....</b>	<b>28</b>

# 1. Introduction

The Northern Territory (NT) Petroleum (Environment) Regulations 2016 (NT) (the Regulations) require an interest holder to provide a report to the Minister for Environment on an annual basis that outlines the environmental performance of the interest holder<sup>1</sup> (the Annual Environment Performance Report). The report must include sufficient information to allow the Minister to assess whether the interest holder has met the environmental outcomes and environmental performance standards included in the approved Environment Management Plan (EMP). The report is to consider information required to be recorded, monitored, or reported under the Regulations and any other law in force in the NT related to the conduct of the regulated activity.

This Annual Environmental Performance Report (AEPR) outlines the environmental performance of Imperial Oil and Gas Pty Ltd in respect to achieving the environmental outcomes and environmental performance standards, and monitoring, recording, and reporting requirements described within:

- 2D Seismic Work Program Environmental Management Plan EP 187 (IMP1-3), approved on the 26<sup>th</sup> of September 2019. Hereafter referred to as the EMP.

The period covered by this AEPR is from 26<sup>th</sup> September 2022 to 25<sup>th</sup> September 2023, inclusive.

An illustration of regulated activity timing is presented in **Table 1**.

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<sup>1</sup> Petroleum (Environment) Regulations 2016 (NT) sch 1, item 11.

Table 1. Timing of Regulated Activities

	2019				2020												2021												2022												2023											
	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec												
Seismic Line Preparation																																																				
Seismic Line Acquisition																																																				
Seismic Line Rehabilitation																																																				
Post Wet Season Weed Survey																																																				
Rehabilitation Report																																																				
Reg 14 closure notice submitted																																																				
Minister Rejected Rehab																																																				

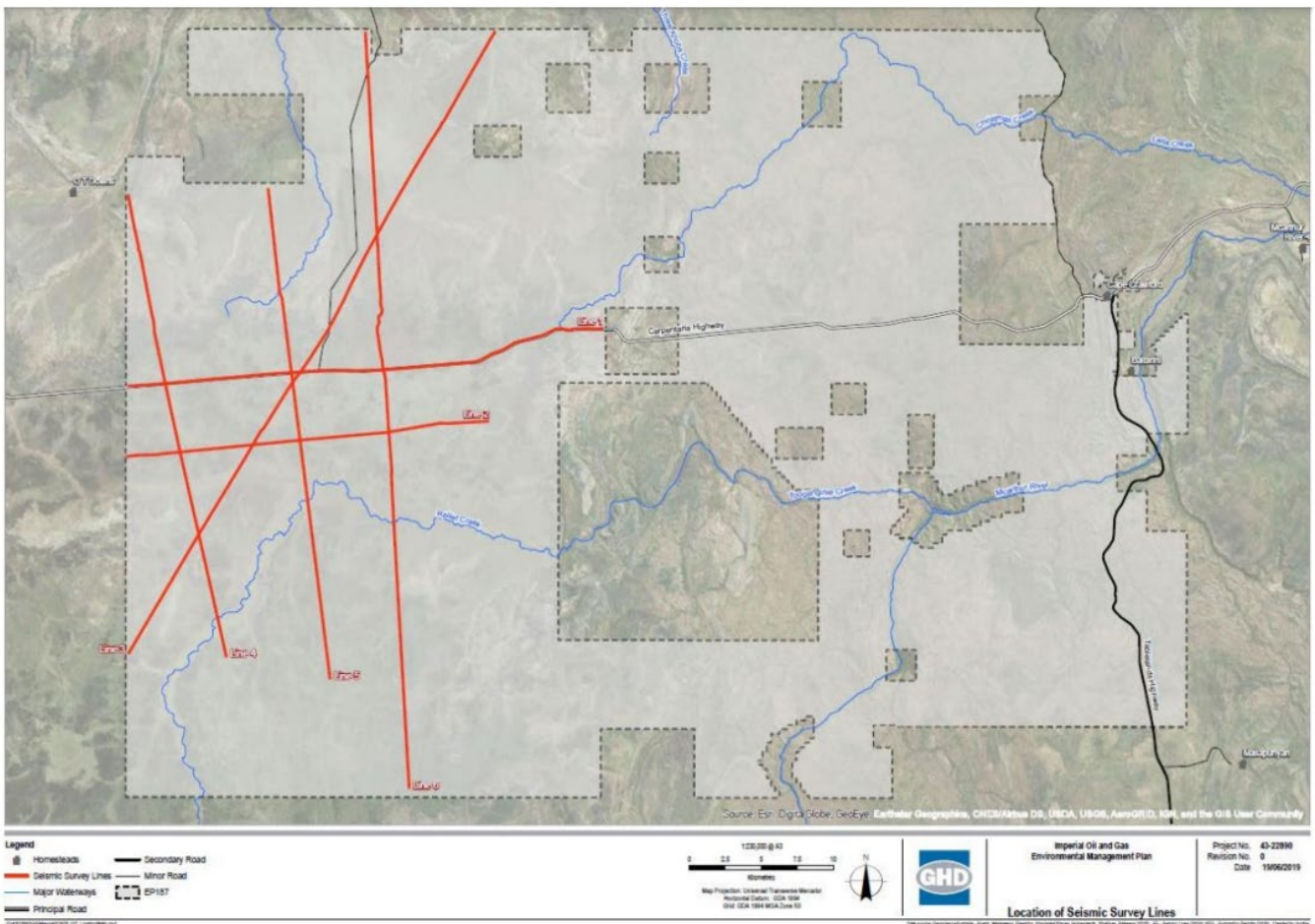
## 1.1. Background

Imperial Oil and Gas Pty Ltd (Imperial) submitted the Environmental Management Plan titled 2D Seismic Work Program EP187 (The EMP), July 2019 under the Petroleum (Environment) Regulations (PER) that came into force 6 July 2016. The EMP was submitted to cover the preparation, acquisition and remediation of up to 231.0 kilometres of 2D seismic on the Exploration Permit 187 (EP187). The location of the regulated activities is shown in Figure 1.

Seismic surveying was completed in 2019 with rehabilitation commencing in 2020.

During the reporting period of 26/09/2022 – 25/09/2023 of this AEPR, there has been no regulated activity under this EMP.

The location of the regulated activities is shown in **Figure 1**.



**Figure 1. Location of the Carpentaria -1 Regulated Activities within EP187.**

## 1.2. Contents of performance report

This AEPR describes the environmental performance of Imperial Oil and Gas Pty Ltd by evaluation of the following:

1. Compliance with Ministerial approval conditions, for each EMP.
2. Compliance with each environmental outcome and environmental performance standard within the approved EMP.
3. Compliance with reporting requirements in accordance with the Code and Regulations
4. All recordable and reportable incidents, including root cause analysis and related corrective actions to prevent re-occurrence.
5. Findings of all regulatory inspections and audits and related actions to address any findings.

## 1.3. Assessment of performance

Table 2 shows the performance status indicators used in this AEPR.

**Table 2: Performance Descriptors**

Indicator	Description
Compliant	Compliant with requirement for entire 12-month reporting period
Not Compliant	Interest holder did not comply with the requirement fully or at all during the reporting period
Not Applicable	Requirement not applicable during the reporting period

## 1.4. Evidence of performance

The following sources of evidence are used to demonstrate compliance:

- Internal assessment of compliance through verification of:
  - Communications Log
  - Recordable incident reports submitted to Department of Environment, Parks and Water Security (DEPWS)
  - 2022-2023 Emissions Report emailed to [onshoregas.DEPWS@nt.gov.au](mailto:onshoregas.DEPWS@nt.gov.au) 29/09/2023
  - Annual Fire Mapping for EP 187 – May 2023

## 2. Demonstration of Performance

Table 3 demonstrates Imperial Oil and Gas Pty Ltd's compliance with Ministerial EMP approval conditions.

**Table 3: Compliance with Ministerial EMP Approval Conditions**

No	Ministerial Condition	Performance Status	Evidence
1	The Interest Holder must provide a report to the Department of Environment and Natural Resources (DENR) where there is a non-compliance of an approval condition within 48 hours of becoming aware of the non-compliance.	Not Applicable	No non-compliances of Ministerial Approval conditions occurred during the reporting period of this AEPR.
2	The Interest Holder must submit to DENR a timetable for the regulated activity prior to commencement of the activity and update the timetable each month.	Not Applicable	No regulated activities occurred during the reporting period of this AEPR.
3	The Interest Holder must provide to DENR within 3 months of completion of the regulated activity:		
	i. High resolution aerial imagery of the disturbance area	Not Applicable	The regulated activity was completed in November 2019, as such these requirements were due to be satisfied February 2020 and are outside the reporting period of this AEPR.
	ii. Digital aerial photography or UAV imagery, ortho-rectified using ground control points measured using a differential GPS (DGPS) and spatial accuracy of approximately 1-2 metres	Not Applicable	The regulated activity was completed in November 2019, as such these requirements were due to be satisfied February 2020 and are outside the reporting period of this AEPR.
	iii. A spatial assessment report on the disturbance footprint for the approved regulated activity	Not Applicable	The regulated activity was completed in November 2019, as such these requirements were due to be satisfied February 2020 and are outside the reporting period of this AEPR.
4	The Interest Holder must provide to DENR, an updated rehabilitation plan within 3 months of completion of the regulated activity that includes:		
	i. A commitment to the continuation of rehabilitation and monitoring for three years after completion of activities, or until demonstration by a suitably qualified person, that rehabilitation objectives have been met.	Not Applicable	The regulated activity was completed in November 2019, as such the Ministerial 4 requirements were due to be satisfied February 2020 (an extension was granted to June 2020) and are outside the reporting period of this AEPR.



No	Ministerial Condition	Performance Status	Evidence
	ii. A rehabilitation monitoring report detailing alternative methodologies for monitoring the progress of the rehabilitation, including the use of remote sensing monitoring using high resolution satellite imagery.	Not Applicable	The regulated activity was completed in November 2019, as such the Ministerial 4 requirements were due to be satisfied in February 2020 (an extension was granted to June 2020) and are outside the reporting period of this AEPR.

Table 4 provides a systematic overview of Imperial Oil and Gas Pty Ltd’s performance against the environmental outcomes and environmental performance standards within the approved EMP.

**Table 4: Compliance with Environmental Outcomes and Environmental Performance Standards**

No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
1	<b>Air Quality (Rural air environment with qualities conducive to suitability for the life, health and wellbeing of humans and ecosystems)</b> <ul style="list-style-type: none"> <li>No deterioration to air quality due to Imperials seismic activity.</li> </ul>	No complaints regarding air quality.	Compliant	Communications log does not contain any complaints concerning dust.
2		Comply with all legislation and standards and ensure that all practicable measures are taken to minimise the discharge of odours and any adverse effect.	Compliant	Communications log does not contain any complaints relating to impact on community and/or public amenity.
3		Meet all government air quality standards for emissions.	Compliant	2022 – 2023 Emissions Report (reporting period 01/09/22 – 01/09/23) shows no emissions were generated from regulated activities during the reporting period.
4		Odours from the proposed exploration do not adversely affect the welfare, health and amenity of neighbours and the broader community.	Compliant	Communications log does not contain any complaints concerning dust.
5	<b>Biodiversity – Aquatic, Marine and Terrestrial Ecology</b> <ul style="list-style-type: none"> <li>Maintain the abundance, species diversity, geographic distribution, and productivity of vegetation communities.</li> <li>Maintain the integrity, functions and environmental</li> </ul>	Minimise the risk of disease amplification or distribution within the natural environment.	Not Applicable	No regulated activities occurred during the reporting period of this AEPR.
6		Management of existing weed baseload and control potential introduction and spread of new weeds.	Compliant	NT Weeds training undertaken on the 18/08/2023 with NT DEPWS Weeds Officer Nathan Mills and inGauge staff to review weed management procedures.
7		Monitoring work area to minimise impacts to fauna habitat and sensitive vegetation.	Not Applicable	No regulated activity occurred during the reporting period of this AEPR.

No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
8	<p>values of waterways and groundwater.</p> <ul style="list-style-type: none"> <li>Maintain the ecological function, abundance, species diversity and geographical distribution of flora and fauna (subterranean, terrestrial and freshwater)</li> </ul>	No native fauna impacts (injury or fatality).	Compliant	<p>Quarterly Recordable Reports contain no reports of native fauna injury or fatality under IMP1-3.</p> <ul style="list-style-type: none"> <li>Q4 October – December 2022</li> <li>Q1 January – March 2023</li> <li>Q2 April – June 2023</li> <li>Q3 July– September 2023</li> </ul>
9	<ul style="list-style-type: none"> <li>Maintain, and where possible enhance, the local, regional and national conservation values of the area.</li> </ul>	No loss of sensitive and/or riparian vegetation.	Compliant	<p>Quarterly Recordable Reports contain no reports of loss of sensitive and/ or riparian vegetation.</p> <ul style="list-style-type: none"> <li>Q4 October – December 2022</li> <li>Q1 January – March 2023</li> <li>Q2 April – June 2023</li> <li>Q3 July– September 2023</li> </ul>
10		No long-term loss of habitat due to seismic activities.	Compliant	<p>Quarterly Recordable Reports contain no reports of habitat loss.</p> <ul style="list-style-type: none"> <li>Q4 October – December 2022</li> <li>Q1 January – March 2023</li> <li>Q2 April – June 2023</li> <li>Q3 July– September 2023</li> </ul>
11	<p><b>Cultural (Maintain cultural heritage of the region, both indigenous and nonindigenous)</b></p>	Cultural and heritage integrity and diversity of the area is maintained.	Compliant	Communications log contains no complaints of impacts to sites or items of heritage significance.
12	<ul style="list-style-type: none"> <li>Protect cultural values of the area.</li> <li>Minimise impacts on cultural heritage.</li> <li>Minimise impacts upon or disruption to activities of</li> </ul>	No incidences of disturbance of archaeological sites or sites of cultural significance.	Compliant	<p>Quarterly Recordable Reports contain no incidences of archaeological sites or sites of cultural significance.</p> <ul style="list-style-type: none"> <li>Q4 October – December 2022</li> <li>Q1 January – March 2023</li> <li>Q2 April – June 2023</li> <li>Q3 July– September 2023</li> </ul>

No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
13	<p>indigenous stakeholders in culturally significant areas.</p> <ul style="list-style-type: none"> <li>Avoid disturbance of or damage to Aboriginal or cultural heritage artefacts or Sacred Sites.</li> </ul>	<p>Ensure minimum footprint impact changes to the biological and physical environment occur and that these changes do not adversely affect cultural associations with the area.</p>	Compliant	<p>Quarterly Recordable Reports contain no instances of environmental or cultural harm occurring onsite.</p> <ul style="list-style-type: none"> <li>Q4 October – December 2022</li> <li>Q1 January – March 2023</li> <li>Q2 April – June 2023</li> <li>Q3 July– September 2023</li> </ul>
14		<p>No unauthorised disturbance to identified cultural and heritage sites and/or objects of significance</p>	Compliant	<p>Communications log contains no complaints of impacts to sites or items of heritage significance. No unauthorised disturbance occurred.</p>
15	<p><b>Land (Suitability and stability of land for existing uses)</b></p> <ul style="list-style-type: none"> <li>Maintain existing quality of soil profile.</li> <li>Minimise land disturbance.</li> <li>Protect the productivity of the land for its intended use.</li> </ul>	<p>Ensure that vegetation clearing for seismic line preparation does not result in land degradation.</p>	Not Applicable	<p>No vegetation clearing for seismic line preparation was undertaken during the reporting period of this AEPR.</p>
16		<p>Any ground disturbance activity will be undertaken in accordance with the ESP and LCP.</p>	Not Applicable	<p>No ground disturbance was undertaken during the reporting period of this AEPR.</p>
17		<p>Ensure that rehabilitation is compatible with existing land use and meets the expected standards of the community</p>	Compliant	<p>Communications log contains no complaints of impacts from existing land users.</p>
18		<p>Areas left safe, stable and non-polluting.</p>	Compliant	<p>No permanent detrimental impacts to water resources (surface or groundwater) or waterways / wetlands. No permanent detrimental impact to biodiversity or ecological function. Quarterly Recordable Reports contain no instances of environmental or pollution occurring onsite.</p> <ul style="list-style-type: none"> <li>Q4 October – December 2022</li> <li>Q1 January – March 2023</li> </ul>

No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
				<ul style="list-style-type: none"> <li>Q2 April – June 2023</li> <li>Q3 July– September 2023</li> </ul>
19	<b>Surface and Groundwater (Stability of land to preserve existing water quality, landscapes and ecosystems)</b> <ul style="list-style-type: none"> <li>Protection of waterways.</li> <li>Protect the quantity and quality of surface and groundwater.</li> </ul>	Maintain, and where possible enhance, the beneficial use of surface water and groundwater and maintain quality to ensure ecosystem maintenance.	Compliant	No permanent detrimental impacts to water resources (surface or groundwater) or waterways / wetlands. Quarterly Recordable Reports contain no instances of surface water or groundwater pollution occurring onsite. <ul style="list-style-type: none"> <li>Q4 October – December 2022</li> <li>Q1 January – March 2023</li> <li>Q2 April – June 2023</li> <li>Q3 July– September 2023</li> </ul>
20		No degradation to surface water quality or drainage.	Compliant	Quarterly Recordable Reports contain no instances of surface water occurring onsite. <ul style="list-style-type: none"> <li>Q4 October – December 2022</li> <li>Q1 January – March 2023</li> <li>Q2 April – June 2023</li> <li>Q3 July– September 2023</li> </ul>
21		No detrimental impact to groundwater dependent ecosystems.	Compliant	No permanent detrimental impact to biodiversity or ecological function. Quarterly Recordable Reports contain no instances of environmental harm to groundwater dependent ecosystems: <ul style="list-style-type: none"> <li>Q4 October – December 2022</li> <li>Q1 January – March 2023</li> <li>Q2 April – June 2023</li> <li>Q3 July– September 2023</li> </ul>
22		No new erosion flow paths originated from seismic activities.	Compliant	No permanent instability affecting soil or landforms. Quarterly Recordable Reports contain no

No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
				instances of new erosion originating from seismic activities: <ul style="list-style-type: none"> <li>• Q4 October – December 2022</li> <li>• Q1 January – March 2023</li> <li>• Q2 April – June 2023</li> <li>• Q3 July– September 2023</li> </ul>
23	<b>Protection of ecosystems and human health values from uncontrolled oil releases</b> <ul style="list-style-type: none"> <li>• Minimise impacts to ecosystems, land productivity and human health values</li> <li>• Minimise impacts on soil, surface water and groundwater</li> </ul>	No uncontrolled releases of oils.	Compliant	No recordable incidents. Quarterly Recordable Reports contain no instances of spills: <ul style="list-style-type: none"> <li>• Q4 October – December 2022</li> <li>• Q1 January – March 2023</li> <li>• Q2 April – June 2023</li> <li>• Q3 July– September 2023</li> </ul>
24		No incorrect storage and use of oils.	Compliant	No recordable incidents. Quarterly Recordable Reports contain no instances of incorrect use of oils: <ul style="list-style-type: none"> <li>• Q4 October – December 2022</li> <li>• Q1 January – March 2023</li> <li>• Q2 April – June 2023</li> <li>• Q3 July– September 2023</li> </ul>
25	<b>Noise and Vibration (Livelihood and wellbeing of local communities and towns)</b> <ul style="list-style-type: none"> <li>• No impact to surrounding stakeholder from noise</li> <li>• No loss to the aesthetic or enjoyment factor for the community</li> </ul>	Maintain noise and vibration levels within statutory guidelines for rural areas.	Not Applicable	Seismic operations were not undertaken during the reporting period of this AEPR.
26		Ensure that an adequate level of service, safety and public amenity is maintained.	Compliant	Communications log contains no complaints during the reporting period of this AEPR.
27		Manage seismic operations only to daylight.	Not Applicable	Seismic operations were not undertaken during the reporting period of this AEPR.

No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
28	<ul style="list-style-type: none"> <li>Minimise safety risk to the public and other third parties</li> <li>Maintain and enhance partnerships with the local community, including using local</li> </ul>	The community is highly consulted with, and all comments provided are assessed and those viable implemented.	Not Applicable	Community consultation was undertaken prior to the reporting period of this AEPR.
29	<b>Planning and Social (Livelihood and wellbeing of local communities and towns)</b> <ul style="list-style-type: none"> <li>Maintain the recreational values of the area</li> <li>Protect the economic values of the area</li> </ul>	Identify opportunities to deliver benefits to the local community throughout all phases of the Project.	Compliant	Local hire contractors are engaged under IMP4-3 for works undertaken in EP 187 so not applicable for IMP1-3 . Additional employment for residents delivers economic benefit to the local community.
30		Identify, and to the greatest extent practicable minimise, any potential adverse effects on the community.	Compliant	Communications log contains no complaints during the reporting period of this AEPR.
31		No off-site release of contamination from seismic activities.	Not Applicable	Seismic operations were not undertaken during the reporting period of this AEPR.
32		An absence of issues raised by the community as indicator for successful communication.	Compliant	Communications log contains no complaints during the reporting period of this AEPR.
33		No unresolved complaints.	Compliant	Communications log contains no complaints during the reporting period of this AEPR.
34		High level of satisfaction by the community.	Compliant	Communications log contains no complaints during the reporting period of this AEPR.
35	<b>Waterways (Stability of land to preserve existing water quality, landscapes and ecosystems)</b> <ul style="list-style-type: none"> <li>Protection of waterways</li> </ul>	Maintain the integrity, stability and environmental values of the creek, riverbanks, and watercourses.	Not Applicable	No regulated activities occurred during the reporting period of this AEPR.
36		Protect existing water processes including sediment movement.	Not Applicable	No regulated activities occurred during the reporting period of this AEPR.

No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
37	<ul style="list-style-type: none"> <li>Protect the quantity and quality of surface water</li> </ul>	No loss of sensitive vegetation (e.g., riparian) resulting from seismic activities.	Not Applicable	No regulated activities occurred during the reporting period of this AEPR.
38	<b>Waste Disposal (Maintain the integrity of ecosystems and agricultural productivity)</b> <ul style="list-style-type: none"> <li>Minimise impacts to ecosystems, land productivity and human health values</li> <li>Minimise impacts on soil, surface water, groundwater, sensitive habitat and air quality</li> <li>Minimise waste generation</li> </ul>	No interaction of wildlife, stock or human receptors with stored waste.	Not Applicable	No waste was stored onsite during the reporting period of this AEPR.
39		No rubbish is left in the area after completion of seismic operations.	Not Applicable	Seismic operations were not undertaken during the reporting period of this AEPR.
40		All waste is transported and disposed of offsite in accordance with The Code.	Not Applicable	No regulated activities occurred during the reporting period of this AEPR.
41		All rubbish generated in the field is segregated in accordance with Schedule 2 of the Waste Management and Pollution Control (Administration) Regulations 1998 for disposal at the nearest approved refuse station.	Not Applicable	No regulated activities occurred during the reporting period of this AEPR.
42		No oil contamination to the environment	Compliant	No recordable incidents. Quarterly Recordable Reports contain no instances of spills: <ul style="list-style-type: none"> <li>Q4 October – December 2022</li> <li>Q1 January – March 2023</li> <li>Q2 April – June 2023</li> <li>Q3 July– September 2023</li> </ul>
43	<b>Visual and Landscape (Livelihood and wellbeing of local communities and towns)</b>	Design the Programme to minimise any detriment to the visual amenity of the area.	Compliant	Communications log contains no complaints during the reporting period of this AEPR.
44	<ul style="list-style-type: none"> <li>Minimise impacts upon environmental values of the local community</li> </ul>	Acknowledge the introduction of a non-rural element into the landscape and seek to minimise the effect.	Compliant	Communications log contains no complaints during the reporting period of this AEPR.



No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
45	<ul style="list-style-type: none"> <li>Maintain and enhance partnerships with the local community, including using local contractors</li> <li>No loss to the aesthetic or enjoyment factor for the community.</li> </ul>	Manage potential overspill from light sources and comply with appropriate standards.	Not Applicable	No regulated activities occurred during the reporting period of this AEPR.
46		High level of satisfaction by the community.	Compliant	Communications log contains no complaints during the reporting period of this AEPR.
47		An absence of issues raised by the community as indicator for successful communication.	Compliant	Communications log contains no complaints during the reporting period of this AEPR.
48		No unresolved complaints.	Compliant	Communications log contains no complaints during the reporting period of this AEPR.
49	<b>Traffic (Livelihood and wellbeing of local communities and towns)</b> <ul style="list-style-type: none"> <li>Minimise safety risks to the public and other third parties.</li> <li>No loss to the aesthetic or enjoyment factor for the community.</li> <li>Minimise impacts upon environmental values of the local community.</li> </ul>	Ensure that roads are maintained, and road traffic managed to meet the required level of service.	Not Applicable	Seismic operations were not undertaken during the reporting period of this AEPR. Road traffic management not required.
50		Implement appropriate measures to mitigate adverse traffic effects.	Not Applicable	Seismic operations were not undertaken during the reporting period of this AEPR. Road traffic management not required.
51		An absence of issues raised by the community as indicator for successful communication.	Compliant	Communications log contains no complaints during the reporting period of this AEPR.
52		No unresolved complaints.	Compliant	Communications log contains no complaints during the reporting period of this AEPR.
53		The community is highly consulted with and all comments provided are assessed and those viable implemented.	Not Applicable	Community consultation was undertaken prior to the reporting period of this AEPR.
54		High level of satisfaction by the community.	Compliant	Communications log contains no complaints during the reporting period of this AEPR.
55		No vehicular accidents.	Compliant	No recordable incidents. Quarterly Recordable Reports contain no instances of vehicular accidents: <ul style="list-style-type: none"> <li>Q4 October - December 2022</li> </ul>

No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
				<ul style="list-style-type: none"> <li>Q1 January – March 2023</li> <li>Q2 April – June 2023</li> <li>Q3 July– September 2023</li> </ul>
56	<b>Health, Safety and Risk (Livelihood and wellbeing of local communities and towns)</b> <ul style="list-style-type: none"> <li>Minimise safety risks to the public and other third parties</li> </ul>	Undertake an open and transparent risk assessment process and ensure that all risks are managed in an acceptable manner.	Compliant	IMP1-3 Table 15 contains Environmental Management Risk Assessment which is open and transparent.
57		Ensure that risk is managed to meet current government standards.	Compliant	IMP1-3 Table 15 contains Environmental Management Risk Assessment which mitigates risk to government standards.
58		An absence of issues raised by the community as indicator for successful communication.	Compliant	Communications log contains no complaints during the reporting period of this AEPR.
59		No unresolved complaints.	Compliant	Communications log contains no complaints during the reporting period of this AEPR.
60		The community is highly consulted with, and all comments provided are assessed and those viable implemented.	Not Applicable	Community consultation was undertaken prior to the reporting period of this AEPR.
61		High level of satisfaction by the community.	Compliant	Communications log contains no complaints during the reporting period of this AEPR.
62		No vehicular accidents.	Compliant	No recordable incidents. Quarterly Recordable Reports contain no instances of vehicular accidents: <ul style="list-style-type: none"> <li>Q4 October – December 2022</li> <li>Q1 January – March 2023</li> <li>Q2 April – June 2023</li> <li>Q3 July– September 2023</li> </ul>

Table 5 demonstrates Imperial Oil and Gas Pty Ltd 's compliance with reporting requirements in the *Code of Practice: Onshore Petroleum Activities in the Northern Territory* (Code of Practice) and Imperial's compliance with reporting and monitoring requirements under the Petroleum (Environment) Regulations 2016 (NT) schedule 1, item 11(2), which requires the EMP to include all information required to be recorded, monitored or reported. Where relevant, Imperial Oil and Gas Pty Ltd has also confirmed that all records, monitoring or required reporting under the Petroleum (Environment) Regulations 2016 (NT),<sup>2</sup> or under a commitment made in the EMP, has been provided to DEPWS or the relevant NTG agency.

**Table 5: Compliance with Reporting and Monitoring Requirements**

No	Reference	Requirement	Performance Status	Evidence
1	Code cl A.3.5	Geospatial information depicting areas cleared is to be provided to the Minister.	Not Applicable	No areas cleared during the reporting period of this AEPR.
2	Code cl A.3.6 (b)	Weed management plan developed as part of the EMP must provide for ongoing weed monitoring.	Compliant	Appendix 13 Weed Management Plan provides for ongoing weed monitoring in Table 5: Annual Action Plan.
3	Code cl A.3.7(a)vi	The fire management plan developed as part of the EMP must provide for annual fire mapping to monitor changes to fire frequency in the relevant areas.	Compliant	Annual fire mapping was undertaken in May 2023 for EP 187 to monitor changes in fire frequency.
4	Code cl A.3.9(c) Code cl A.3.9(e)	The rehabilitation plan developed as part of the EMP requires progressive rehabilitation of significantly disturbed land which is required to commence no longer than 12 months following the cessation of activities on the land. It also requires regular maintenance and annual monitoring of rehabilitated areas.	Compliant	Section 4.3.9.1 Rehabilitation Activities in the EMP includes – <ul style="list-style-type: none"> <li>• Progressive rehabilitation of significantly disturbed land, which is to commence immediately after completion of seismic operations.</li> <li>• Commitments to undertake photo monitoring at pre line preparation, post seismic acquisition, post wet season and follow up in 12 months.</li> </ul>

<sup>2</sup> Petroleum (Environment) Regulations 2016 (NT) sch 1, item 11(2).

No	Reference	Requirement	Performance Status	Evidence
5	Code cl B.4.13.2(c)	<p>As a minimum, the following must be recorded and reported for each stage (where a stage in this context means all fluids pumped at a particular depth interval):</p> <ul style="list-style-type: none"> <li>a) total volume of hydraulic fracturing fluid pumped,</li> <li>b) quality of water used (tested for analytes in section C.8 of this Code. Analyses do not need to be repeated if the same water source is used for multiple stages) and</li> <li>c) typical and maximum concentrations of chemicals or other substances used.</li> </ul>	Not Applicable	No hydraulic fracturing pumped during the reporting period of this AEPR.
6	Code cl B.4.13.2(k)iv	Where venting is the only technically feasible option for managing produced gas, the technical considerations preventing the use of the recovered gas must be recorded and included in the operator's annual report.	Not Applicable	No venting occurred during the reporting period of this AEPR.
7	Code cl B.4.14.2(c)	All new barriers or new well operating envelopes must be verified and clearly documented and reported by submission of an updated well barrier integrity validation (WBIV) report to DITT.	Not Applicable	No new barriers or well operating envelopes to verify or document during the reporting period of this AEPR.
8	Code cl B.4.15.2(j)	Complete and accurate records of the entire decommissioning procedure must be kept, with these records submitted as part of the	Not Applicable	No decommissioning of petroleum wells occurred during the reporting period of this AEPR.

No	Reference	Requirement	Performance Status	Evidence
		legislative reporting requirements for the decommissioning of petroleum wells.		
9	The Code cl B.4.17.2(d)	Any guidelines published by the Northern Territory Government from time to time relating to reporting and data submission, and groundwater monitoring data standards must be followed.	Not Applicable	No groundwater monitoring data required during the reporting period of this AEPR.
10	Code cl C.3(e)	The components of the wastewater management framework, include: Monitor, manage and report in accordance with the Wastewater Management Plan and Spill Management Plan.	Not Applicable	No wastewater management framework required during the reporting period of this AEPR.
11	Code cl C.6.1(d)	Wastewater tracking documentation must be reported to the Minister at least annually in accordance with the framework (Spill Management Plan and Wastewater Management Plan) outlined in the EMP.	Not Applicable.	No wastewater tracking documentation required during the reporting period of this AEPR.
12	Code cl C.7.1(d)ii	Wastewater Management Plan must include a program for monitoring and reporting against the effectiveness of the measures for the mitigation of interaction with wildlife, stock and human receptors with wastewater.	Not Applicable	No wastewater tracking documentation required during the reporting period of this AEPR.
13	Code cl D.5.9.2(c)	Emissions from exploration, well construction (including during	Compliant	2022 - 2023 Emissions Report (reporting period 01/09/22 - 01/09/23) shows no emissions were generated from regulated activities during the reporting period.

No	Reference	Requirement	Performance Status	Evidence
		flowback) and workovers must be measured and reports submitted. <i>Note: the interest holder must provide to DEPWS a report on actual versus predicted greenhouse gas emissions in the EMP, and cumulative emissions.</i>		
14	Code cl D.5.9.3(a)	Where natural gas is vented or flared at a gas processing or other downstream facility, emissions must be estimated and reported.	Not Applicable.	No natural gas was vented or flared during the reporting period of this AEPR.
15	Reg 14	A current EMP remains in force until the interest holder notifies the Minister the activity is no longer being carried out and all of the environmental outcomes and obligations under the plan have been met, and the Minister advises the interest holder the notice is accepted, and the plan ceases to be in force.	Non-Compliant	Reg 14 closure notice was provided to DEPWS. The information provided did not meet the expected standards of DEPWS or the Hon Minister Lauren Moss. Imperial believed rehabilitation standards were met and closed the EMP prior to receiving acceptance notice from the Minister.
16	Reg 33	DEPWS is notified of reportable incidents within 2 hours of the interest holder becoming aware of the incident, or within 2 hours of the incident occurring. A written report must be provided within 24 hours if the initial report was made orally.	Not Applicable.	No reportable incidents occurred during the reporting period of this AEPR.
17	Reg 34	Reports on reportable incidents are to be provided to DEPWS as soon	Not Applicable.	No reportable incidents occurred during the reporting period of this AEPR.

No	Reference	Requirement	Performance Status	Evidence
		as practicable and within 72 hours of the event occurring. A final report must be provided to DEPWS within 30 days after remediation/cleanup of the affected area.		
18	Reg 35	A written report of all recordable incidents must be provided to DEPWS not later than 15 days after the 90 day reporting period (unless otherwise agreed).	Compliant	All recordable incident reports were provided to DEPWS no later than 15 days after the 90-day reporting period. Reports were submitted to <a href="mailto:Onshoregas.DEPWS@nt.gov.au">Onshoregas.DEPWS@nt.gov.au</a> on the below dates. Q4 – emailed 13 <sup>th</sup> January 2023 by Charles Dack Q1 – emailed 11 <sup>th</sup> April 2023 by Charles Dack Q2 – emailed 14 <sup>th</sup> July 2023 by Sophie Hagan Q3 – emailed 12 <sup>th</sup> October 2023 by Rachel Leembruggen
19	Reg 37A	A report about flowback fluid from hydraulic fracturing must be provided to the Minister within 6 months of the flowback occurring.	Not Applicable.	Report not required during the reporting period of this AEPR.
20	Reg 37B	A report about produced water from hydraulic fracturing must be provided to the Minister within 6 months of the produced water being extracted.	Not Applicable.	Report not required during the reporting period of this AEPR.
21	Schedule 1, item 12	Interest holder must notify the Minister, occupier of the land and owner of the land on which the activity is to be carried out <b>before</b> commencement of construction, <sup>3</sup> drilling, or seismic surveys.	Not Applicable.	No activity to notify during the reporting period of this AEPR.

<sup>3</sup> Note, civil works are also considered ‘construction’ activities.

No	Reference	Requirement	Performance Status	Evidence
22	EMP Section, 4.3.8 Rehabilitation Activities And, 4.3.9.1. Rehabilitation Activities	The monitoring stations will be photographed pre line preparation, post seismic acquisition and post wet season with a follow up in 12 months to show the changes resulting from the planned works. And A series of photos will be taken from a fixed location at regular intervals with the aim of visually showing improvement in vegetation condition. The monitoring stations will be photographed pre line preparation, post seismic acquisition and post wet season follow up in 12 months to show the changes resulting from the planned works. The same field of view inclusive of the original bearing and reference points will be maintained	Non-Compliant	Series of photographs were not taken from a fixed location at regular intervals with the aim of visually showing improvement in vegetation condition. The same field of view inclusive of the original bearing and reference points were not maintained.
23	EMP Section 7.5.1.17. Rehabilitation Plan	Rehabilitation audit by independent suitably qualified person (SQP) following rehabilitation works. Report will be provided to DEPWS within 2 weeks of the audit.	Not Applicable.	No rehabilitation audits were undertaken during the reporting period of this AEPR.
24	EMP Section 7.6.1. Routine Reporting	During operations a weekly report shall be forwarded to the Director and DEPWS stating progress of the survey. When a survey has been completed, a summary stating the start and completion dates and the number of kilometres or samples acquired shall also be forwarded.	Not Applicable.	Seismic operations were not undertaken during the reporting period of this AEPR.



No	Reference	Requirement	Performance Status	Evidence
25	EMP Table 15. Environmental Management Risk Assessment	Release of chemical/hazardous materials will be reported to the DEPWS as required	Not Applicable.	No recordable incidents. Quarterly Recordable Reports contain no instances of chemical/ hazardous material releases: <ul style="list-style-type: none"> <li>• Q4 October – December 2022</li> <li>• Q1 January – March 2023</li> <li>• Q2 April – June 2023</li> <li>• Q3 July– September 2023</li> </ul>
26	EMP Section 7.5.1.16. Bushfire Management Plan	In the event of an accidental ignition will be reported to the property manager	Not Applicable.	No recordable incidents. Quarterly Recordable Reports contain no instances of accidental ignition: <ul style="list-style-type: none"> <li>• Q4 October – December 2022</li> <li>• Q1 January – March 2023</li> <li>• Q2 April – June 2023</li> <li>• Q3 July– September 2023</li> </ul>
27	EMP Section 7.6 Table 21	Annual ecology study.	Non-Compliant	Imperial believed annual ecology studies were met and closed the EMP prior to receiving acceptance notice from the Minister May 2023.
28	EMP Section 7.6 Table 21	Weed invasion – post activity	Not Applicable.	No regulated activities occurred during the reporting period of this AEPR.
29	EMP Section 7.6 Table 21	Monthly Summary Operations Report outlining: <ul style="list-style-type: none"> <li>• Weed invasion</li> <li>• Fire management – incidents</li> <li>• Vegetation clearing – by event</li> <li>• Work boundaries – fencing by event</li> <li>• Dust control</li> </ul>	Not Applicable.	Seismic operations were not undertaken during the reporting period of this AEPR.

No	Reference	Requirement	Performance Status	Evidence
		<ul style="list-style-type: none"> <li>• Smoke – by incident report summary</li> <li>• Noise complaints summary</li> <li>• Vibration complaints summary</li> <li>• Visual amenity complaints summary</li> <li>• Sediment Control</li> <li>• Spills (as applicable)</li> <li>• Erosion control (as applicable)</li> <li>• Loss of topsoil (as applicable)</li> <li>• Loss of stability (as applicable)</li> <li>• Equipment log</li> <li>• Fuels &amp; oils used</li> <li>• Incident reporting (as applicable)</li> </ul>		
30	EMP Section 7.6 Table 21	Daily Operations Report outlining: <ul style="list-style-type: none"> <li>• Weather</li> <li>• Vehicle access</li> <li>• Work program</li> <li>• Sediment control</li> <li>• Environmental incidents (as applicable)</li> </ul>	Not Applicable.	Seismic operations were not undertaken during the reporting period of this AEPR.
31	EMP Section 7.6 Table 21	Rehabilitation Monitoring: - Quarterly Photo point sites	Non-Compliant	Series of photographs were not taken from a fixed location at regular intervals with the aim of visually showing improvement in vegetation condition.  The same field of view inclusive of the original bearing and reference points were not maintained.

No	Reference	Requirement	Performance Status	Evidence
32	EMP Section 7.6.1. Routine Reporting	In accordance with Part V Geophysical and Geological Surveying of the Schedule of onshore petroleum exploration and production requirements Division 2 section 512, a weekly report shall be forwarded to the Director and DEPWS stating progress of the survey.	Not Applicable.	Seismic operations were not undertaken during the reporting period of this AEPR.
33	EMP Section 7.6.1. Routine Reporting	On completion of the activity a written report of the activity and interpretation of the results shall be forwarded to the Director within 12 months of the completion date of the acquisition and shall include	Not Applicable.	Seismic operations were not undertaken during the reporting period of this AEPR.
34	EMP Section 7.6.2. Incident Reporting	In accordance with the "Schedule of Onshore Petroleum Exploration and Production Requirements 2017" (Part II, Division 3 - Reporting) a report will be issued as required under the regulations for the reporting of death and Serious Injury, Serious damage, and a potentially hazardous event where the event is not in the normal or ordinary course of operations and where damage that occurs to property that results in loss of structural integrity or load bearing capacity or some other significant unsafe condition occurs	Not Applicable.	Seismic operations were not undertaken during the reporting period of this AEPR.

## 3. Overall Performance

### 3.1. Overview of performance

Table 6 provides a summary of the results of the compliance assessment against the 103 total compliance items.

**Table 6: Performance Summary**

Compliance Indicator	Number	Percentage
Compliant	47	46%
Not Compliant	4	4%
Not Applicable	52	50%

### 3.2. Overview of non-compliant items

The following sections describe:

- the specific compliance requirements not met for the reporting period
- an analysis of the possible potential environmental harm or impact to environmental values resulting from non-compliance or partial compliance, using multiple lines of evidence
- a summary of the corrective actions already implemented, and further actions still required, as applicable, to ensure compliance is fully achieved in the future.

#### 3.2.1. Regulatory reporting

##### 3.2.1.1. Description

Imperial was non-compliant with the Reg 14, “a current EMP remains in force until the interest holder notifies the Minister the activity is no longer being carried out and all of the environmental outcomes and obligations under the plan have been met, and the Minister advises the interest holder the notice is accepted, and the plan ceases to be in force”.

Imperial previously believed that the submitted Reg 14 closure notice provided sufficient information to demonstrate rehabilitation success and that it would be accepted by the Minister. Imperial ceased routine reporting requirements prior to receiving an acceptance notice from the Minister.

##### 3.2.1.2. Analysis of potential environmental harm or impact

No regulated activities have occurred onsite since 2019, so the potential environmental harm or impact is negligible. This is an administrative error, however, a delay in reporting extends the rehabilitation timeframe until the site is deemed to be successfully rehabilitated. The increased timeframe could increase the chance of weeds being spread onsite from other factors (cattle, landowners etc).

##### 3.2.1.3. Corrective actions

Imperial have now noted that reporting is to continue until the official acceptance notice from the Minister is obtained. All regulatory reporting for IMP1-3 (quarterly recordable reports, AEPRs) is scheduled in Imperials task tracker to continue until receipt of an acceptance notice.

## 3.2.2. Environmental monitoring

### 3.2.2.1. Description

The three environmental monitoring non compliances all relate to rehabilitation monitoring:

EMP Section, 4.3.8 Rehabilitation Activities And, 4.3.9.1. Rehabilitation Activities:

*The monitoring stations will be photographed pre line preparation, post seismic acquisition and post wet season with a follow up in 12 months to show the changes resulting from the planned works. A series of photos will be taken from a fixed location at regular intervals with the aim of visually showing improvement in vegetation condition. The same field of view inclusive of the original bearing and reference points will be maintained.*

EMP Section 7.6 Table 21

*Rehabilitation Monitoring: Quarterly Photo point sites*

The above sections in the EMP also have incohesive commitments, with section 4.3.8. committing to photos taken *pre line preparation, post seismic acquisition and post wet season with a follow up in 12 months.* While Table 21 refers to *quarterly photo monitoring.* Regardless of timeframes, a series of photographs were not taken from a fixed location at regular intervals with the aim of visually showing improvement in vegetation condition. The same field of view inclusive of the original bearing and reference points were not maintained. This has done Imperial a disservice as we are unable to adequately demonstrate the positive rehabilitation outcomes on the ground.

EMP Section 7.6 Table 21

*Annual ecology study*

### 3.2.2.2. Analysis of potential environmental harm or impact

No regulated activities have occurred onsite since 2019, so the potential environmental harm or impact is negligible. However, by not undertaking adequate monitoring there is a risk that required actions are not identified (ie seeding of bare ground, erosion control installation) and successful rehabilitation is delayed.

### 3.2.2.3. Corrective actions

An updated rehabilitation plan will be submitted with the revised EMP 1-3 which is due 26/9/2024 to ensure that successful rehabilitation is clearly demonstrated in the future.

## 3.3. Application of lessons learnt

All non-compliance items contain elements of lapsed monitoring – not adequately monitoring regulatory reporting requirements and not monitoring rehabilitation progress as per EMP commitments. Imperial acknowledges the opportunity to identify where improvements to internal processes are required to ensure future compliance. On investigation, it was determined that:

1. The unapproved Reg 14 submission had unanticipated flow on effects on reporting commitments.
2. An internal restructure created gaps within company commitments.

To ensure that all Ministerial approval conditions and EMP requirements are achieved in a timely manner in the future, the following processes have been established:

1. All monitoring commitments will continue to be enacted after a Reg 14 submission until the official acceptance notice is received from the Minister.
2. Internal restructures have been reviewed and a separate compliance email address has been created (compliance@empiregp.net) to ensure reporting dates and submissions are able to be reviewed by teams rather than one individual.

3. Monitoring requirements for EMP 1-3 have been updated in a compliance monitoring system and a proposal is being drafted to ensure future demonstration of rehabilitation success.