

# Annual Environmental Performance Report

<b>EMP title</b>	Imperial O & G 2021 Carpentaria 1 Work Program EP187
<b>Unique EMP ID</b>	IMP 3-4.2
<b>EMP approval date</b>	15/02/2021
<b>AEPR period</b>	15/02/2023 – 14/02/2024
<b>Petroleum title number/s</b>	Exploration Permit 187 (EP187)

The information to be included in this template may be used by the Minister for Environment, Climate Change and Water Security to assess whether an interest holder is meeting the environmental outcomes, environmental performance standards and obligations and commitments made in an approved Environment Management Plan (EMP).

This form must be completed in accordance with the instruction and guidance provided in the Onshore Petroleum Annual Environmental Performance Reporting Guideline available on the [Onshore Gas website](#).

<b>Document title</b>	Annual Environmental Performance Report
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### Version Control

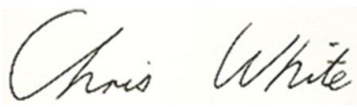
Date	Rev	Reason for Amendment	Author	Checked	Approved
15/5/2024	1	Date of submission	RL	TS, NF	RP
9/9/2024	2	Resubmission after DEPWS feedback during meeting 30/8/24	RL	TS	RP

## Declaration

A person with legal authority to sign on behalf of the interest holder, or all interest holders (if more than one), must sign the declaration.

I hereby declare that I:

- am authorised to make this declaration.
- confirm that, to the best of my knowledge all information provided addresses the relevant matters and is true, correct, complete, and does not contain misleading information.
- am aware that it is an offence under section 107 of the *Petroleum Act 1984* to give an authorised person information that I know, or ought to reasonably know, to be false or misleading in a material manner particular.
- understand that all information supplied as part of this form, including attachments, may be disclosed publically in accordance with section 62A of the *Petroleum Act 1984*, and consistent with the requirements of the Information Privacy Principles (IPPs) in the *Information Act 2002*.

<b>Signatur</b>	
<b>Name of person signing on behalf of interest holder/s</b>	Chris White
<b>Position</b>	Chief Operations Officer
<b>Company</b>	Empire Energy Group Limited
<b>Address</b>	Level 5, 6-10 O'Connell Street, Sydney NSW 2000

Acronyms / Terms	Definition
AEPR	Annual Environmental 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
Interest Holder	Means a person who holds a petroleum interest for a regulated activity.
Minister	Minister for Environment, Climate Change and Water Security
NT	Northern Territory
Operator	Means a person designated as operator under section 16(3)(g) of the <i>Petroleum Act 1984</i>
Regulations	Petroleum (Environment) Regulations 2016 (NT)

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# 1. Introduction

The Petroleum (Environment) Regulations 2016 (NT) (the Regulations) require an interest holder to provide a report to the Minister for Environment, Climate Change and Water Security (the Minister) on no less than an annual basis that outlines the environmental performance of the interest holder.<sup>1</sup> The report, termed the Annual Environmental Performance Report (AEPR), 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) with reference to 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.

Approved Environment Management Plan Details	
EMP title	Imperial O & G 2021 Carpentaria 1 Work Program EP187
Unique EMP ID	IMP3-4.2
EMP approval date	15/02/2021
AEPR period	15/02/2023 - 14/02/2024
Petroleum title number/s	EP187
Regulation 22 Notices	
Date Acknowledged	Scope
22/12/2023	1. Allows transfer of flowback fluid from the Carpentaria 1 above ground tank to the Carpentaria 2 above ground tank.
22/12/2023	2. Updated Emergency Response Plan for EP 187
Regulation 23 Notices	
Date Acknowledged	Scope
NA	NA
Location of Regulated Activity	
<input checked="" type="checkbox"/>	Figure 1 attached showing location of regulated activity
Regulated activities conducted during the reporting period	
1	Earthworks: remediation works done on Carp 1 access tracks and wellpad. 22/5/23 - 8/6/23
2	Fluid transfer from Carp 1 tank. 4/1/24 - 7/2/24
3	Decommissioning of Carp 1 tank. 4/1/24 - 8/2/24
4	Storage of wastewater at Carp 1 sumps, occurred throughout the reporting period.

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

5	Carpentaria 1 well shut in for pressure build-up, occurred throughout the reporting period.
<input checked="" type="checkbox"/>	Gantt chart attached showing the period each regulated activity listed above was conducted

### 1.1. Sources of information to inform performance

Information evaluated to inform compliance status (check applicable sources)	
<input checked="" type="checkbox"/>	Compliance with Ministerial approval conditions
<input checked="" type="checkbox"/>	Compliance with each environmental outcome and environmental performance standard within the approved EMP
<input checked="" type="checkbox"/>	Compliance with reporting requirements in accordance with the Code and Regulations
<input checked="" type="checkbox"/>	Recordable and reportable incidents within the reporting period, including root cause analysis and related corrective actions to prevent re-occurrence
<input checked="" type="checkbox"/>	Findings of regulatory inspections and audits within the reporting period and related actions to address any findings
Other	

### 1.2. Performance indicators

Table 1 shows the performance status indicators used in this AEPR.

Table 1: Performance descriptors

Performance Status	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

### 1.3. Evidence used to assess performance

Please indicate which sources of evidence have been used to demonstrate compliance.

Evidence used to inform compliance status (check applicable evidence)	
<input checked="" type="checkbox"/>	Interest holder self-assessments of compliance, through daily and weekly inspections, as committed to in the EMP
<input checked="" type="checkbox"/>	Interest holder self-assessments of compliance, through internal audits, as committed to in the EMP

<input checked="" type="checkbox"/>	Interest holder self-assessments of compliance, through external audits conducted by third parties
<input checked="" type="checkbox"/>	Outcomes of inspections and/or audits conducted by the regulator
<input checked="" type="checkbox"/>	Spill register entries
<input checked="" type="checkbox"/>	Monitoring or other reports provided to DEPWS, the Department of Industry, Tourism and Trade (DITT) and other government agencies as required by the EMP
<input checked="" type="checkbox"/>	Outcomes of monitoring programs
<input checked="" type="checkbox"/>	Measurement criteria identified in the approved EMP
Other	



## 2. Demonstration of performance

Table 2 demonstrates interest holder compliance with Ministerial EMP approval conditions. Table 2 has been populated to provide examples of information to be included.

Table 2: Compliance with Ministerial approval conditions

No	Ministerial Condition	Compliant	Evidence
1.	<p><b>Condition 1:</b> The interest holder must submit to the Department of Environment, Parks and Water Security (DEPWS), via <a href="mailto:Onshoregas.DEPWS@nt.gov.au">Onshoregas.DEPWS@nt.gov.au</a>:</p> <p>i. notification of the commencement of hydraulic fracturing activities one week prior to commencement;</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Hydraulic fracturing did not occur within the reporting period 15/02/2023 – 14/02/2024.
2.	<p>ii. A timetable for the regulated activity that is to be provided one week prior to the commencement of the activity and each quarter thereafter, or more frequently should other constraints, such as seasonal weather forecasts or travel restrictions emerge, and including:</p> <ul style="list-style-type: none"> <li>• Time-bound commitments in the EMP;</li> <li>• due dates for satisfaction of Ministerial approval conditions;</li> <li>• due dates for regulatory reporting;</li> </ul>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Timetables for the regulated activity including:</p> <ul style="list-style-type: none"> <li>• time-bound commitments in the EMP;</li> <li>• due dates for satisfaction of Ministerial approval conditions;</li> <li>• due dates for regulatory reporting;</li> </ul> <p>Were provided by email to DEPWS via <a href="mailto:Onshoregas.depws@nt.gov.au">Onshoregas.depws@nt.gov.au</a> on the following dates:</p> <ul style="list-style-type: none"> <li>• March 2023</li> <li>• 2 July 2023</li> <li>• 29 September 2023</li> <li>• 30 December 2023</li> </ul>
3.	<p>iii. Daily on-site reports indicating the status and progress of vegetation clearing and hydraulic fracturing, and the freeboard available in open wastewater tanks;</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Daily reports sent in a weekly email to <a href="mailto:Onshoregas.depws@nt.gov.au">Onshoregas.depws@nt.gov.au</a> within the reporting period 15/02/2023 – 14/02/2024 of this AEPR.</p> <p>Reports included:</p> <ul style="list-style-type: none"> <li>• Status of vegetation clearing</li> </ul>

No	Ministerial Condition	Compliant	Evidence
			<ul style="list-style-type: none"> <li>• Status of hydraulic fracturing (not applicable)</li> <li>• Freeboard available in open wastewater tank</li> </ul>
4.	iv. A seven-day activity forecast for the duration of the activity during the wet season (1 October – 30 April each year);	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Seven-day activity forecasts included in weekly reports sent to <a href="mailto:Onshoregas.depws@nt.gov.au">Onshoregas.depws@nt.gov.au</a> within the reporting period 15/02/2023 – 14/02/2024.
5.	v. Written notification of any halt to the activity due to wet season conditions, within 24 hours of the halt;	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Written notification of a halt due to wet season conditions was sent to <a href="mailto:Onshoregas.depws@nt.gov.au">Onshoregas.depws@nt.gov.au</a> on 16 January 2024.
6.	vi. Immediate written notification of any fires potentially threatening the activity from external or internal sources;	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Written notification of a potentially threatening fire was sent to <a href="mailto:Onshoregas.depws@nt.gov.au">Onshoregas.depws@nt.gov.au</a> on: <ul style="list-style-type: none"> <li>• 4 October 2023</li> <li>• 28 November 2023</li> </ul>
7.	vii. Weekly reports that detail the outcome of site inspections, and corrective actions taken, and inclusive of all commitments in the approved EMP, from the commencement of the regulated activity and continuing while the EMP remains in force.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Weekly reports were sent to <a href="mailto:Onshoregas.depws@nt.gov.au">Onshoregas.depws@nt.gov.au</a> within the reporting period 15/02/2023 – 14/02/2024. Reports included: <ul style="list-style-type: none"> <li>• Outcome of site inspections with corrective actions taken/proposed</li> <li>• Inspection commitments relevant to EMP 3-4</li> </ul>
8.	<b>Condition 2:</b> In the event of any accidental release of contaminants that exceeds 200 litres (for liquids), the interest holder must provide a written report to DEPWS within 24 hours of the incident being detected. The report must include:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Spill register records no release of contaminants exceeding 200L occurring within the reporting period 15/02/2023 – 14/02/2024. No spill occurred.

No	Ministerial Condition	Compliant	Evidence
	<ul style="list-style-type: none"> <li>i. Details of the incident specifying material facts, actions taken to avoid or mitigate environmental harm; and</li> <li>ii. The corrective actions taken including the volume and depth of impacted soil removed for appropriate disposal if required; and</li> <li>iii. Any corrective actions proposed to be taken to prevent recurrence of an incident of a similar nature.</li> </ul>		
9.	<p><b>Condition 3:</b> The interest holder must provide to DEPWS within 6 weeks of completion of well flowback operations at the Carpentaria-1 well site on EP187 a report on the risk assessment of flowback wastewater from the hydraulic fracturing phase, via Onshoregas.DEPWS@nt.gov.au. The risk assessment must:</p> <ul style="list-style-type: none"> <li>i. Prepared by a suitably qualified person;<sup>3</sup> and</li> <li>ii. Prepared in accordance with the monitoring wastewater analytes specified in Section C.3 of the <i>Code of Practice: Onshore Petroleum Activities in the Northern Territory</i>.</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Completion of well flowback operations did not occur within the reporting period 15/02/2023 – 14/02/2024.
10.	<p><b>Condition 4:</b> In support of schedule 1, item 11 of the Petroleum (Environment) regulations 2016 (NT) and clause A.3.5 of the Code, the interest must provide geospatial files of the land disturbance footprints(s) to DEPWS, via Onshoregas.DEPWS@nt.gov.au, within 2 months of completion of each land clearing activity.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Land clearing activities did not occur within the reporting period 15/02/2023 – 14/02/2024.

No	Ministerial Condition	Compliant	Evidence
11.	<b>Condition 5:</b> The interest holder must provide an annual report to DEPWS via Onshoregas.DEPWS@nt.gov.au on its environmental performance, in accordance with item 11(1)(b) in schedule 1 of the Petroleum (Environment) Regulations 2016 (NT). The first report must cover the 12 month period from the date of the approval, and be provided within three calendar months of the end of the reporting period. The annual environmental performance report must align with the template prepared by DEPWS for this purpose and be provided each year until such time a notification is made to the Minister under regulation 14 that the activity is complete, or until the EMP is revised and re-approved.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	The IMP3-4.2 2022- 2023 Annual Environmental Performance Report was submitted to <a href="mailto:Onshoregas.depws@nt.gov.au">Onshoregas.depws@nt.gov.au</a> on 14 May 2023, prior to the due date of 15 May 2023. The report covered the period of 15/02/22-14/02/2023 and was aligned with the template prepared by DEPWS.
12.	<b>Condition 6:</b> An emissions report must be provided to DEPWS by 30 September each year, via Onshoregas.DEPWS@nt.gov.au, which summarises actual annual greenhouse gas emissions reported under the <i>Commonwealth National Greenhouse and Energy Reporting Act 2007</i> versus predicted emissions in the EMP.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>The 2022- 2023 IMP 3-4.2 Annual Emissions Report was submitted to <a href="mailto:Onshoregas.depws@nt.gov.au">Onshoregas.depws@nt.gov.au</a> on 29 September 2023, prior to the due date of 30 September 2023.</p> <p>The predicted emissions in the EMP are broken down to each respective activity. As none of these activities were undertaken in the reporting period, there were no emissions to compare against in this report.</p>
13.	<b>Condition 7:</b> Audits of compliance must be undertaken by a suitably qualified and independent person, to be approved by DEPWS, and the audit report provided to DEPWS via Onshoregas.DEPWS@nt.gov.au, no later than two weeks after the completion of the audits, with the focus of the audits as follows: <ol style="list-style-type: none"> <li>i. conduct a readiness audit prior to commencement of hydraulic fracturing to confirm that EMP commitments have been met and that facilities are</li> </ol>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No hydraulic fracturing was commenced within the reporting period 15/02/2023 – 14/02/2024.

No	Ministerial Condition	Compliant	Evidence
	suitable to manage all foreseen risks that could occur during hydraulic fracturing; and		
14.	ii. conduct an operational audit during extended production testing to confirm that EMP commitments in relation to wastewater and spill management have been met.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Extended production testing did not occur within the reporting period 15/02/2023 – 14/02/2024.
15.	<b>Condition 8:</b> In support of clause 16 of the <i>Water Act 1992</i> (NT) and clause B.4.2 of the Code, the interest holder must undertake groundwater level/pressure monitoring at the Carpentaria-1 impact monitoring bore using a logger to record water level for 4 weeks prior to, during, and 4 weeks after completion of hydraulic fracturing operations on Carpentaria-1 well. Data logging should record at a minimum of every 4 minutes for the duration of the recording period. The logging data should be provided to DEPWS via Onshoregas.DEPWS@nt.gov.au within 2 weeks of completion of groundwater level monitoring in the Carpentaria-1 impact monitoring bore.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No hydraulic fracturing was commenced or completed within the reporting period 15/02/2023 – 14/02/2024.
16.	<b>Condition 9:</b> A register must be provided to DEPWS via Onshoregas.DEPWS@nt.gov.au, of the key service providers that will be engaged for the regulated activity, prior to undertaking the relevant scope of work.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Register of Key Service Providers was originally submitted to <a href="mailto:Onshoregas.depws@nt.gov.au">Onshoregas.depws@nt.gov.au</a> on 20 April 2021 to fulfill Ministerial Condition 9, outside the reporting period of this AEPR.
17.	<b>Condition 10:</b> In support of clause B.4.17.2 of the Code, the interest holder must provide to DEPWS, via Onshoregas.DEPWS@nt.gov.au, groundwater monitoring data and an interpretative report of groundwater quality based on the groundwater monitoring required to be conducted at the well site(s) in accordance with Table 6 of	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Quarterly groundwater monitoring data was undertaken from Carpentaria 1 bores RN41678 and RN41800 and submitted to <a href="mailto:Onshoregas.depws@nt.gov.au">Onshoregas.depws@nt.gov.au</a> on: <ul style="list-style-type: none"> <li>• 23 June 2023</li> <li>• 28 June 2023</li> <li>• 14 September 2023</li> </ul>

No	Ministerial Condition	Compliant	Evidence
	<p>the Code. Groundwater data must be provided within one month of collection and be provided quarterly, in a format to be determined by DEPWS.</p> <p>The interpretative report must be provided annually within three months of the anniversary of the approval date of the EMP and include:</p> <ol style="list-style-type: none"> <li data-bbox="237 472 949 608">i. Demonstration that there is no change to groundwater quality or level attributable to conduct of the regulated activity at the well site (s);</li> <li data-bbox="237 628 904 730">ii. Interpretation of any statistical outliers observed from baseline measured values for each of the analytes;</li> <li data-bbox="237 751 837 783">iii. Discussion of any trends observed; and</li> <li data-bbox="237 804 808 868">iv. A summary of the results inclusive of descriptive statistics</li> </ol>		<ul style="list-style-type: none"> <li data-bbox="1256 229 1554 261">• 10 November 2023</li> <li data-bbox="1256 269 1518 301">• 8 February 2024</li> </ul> <p data-bbox="1207 352 2096 454">There was a delay in sampling at Carpentaria 1 in April 2023 due to a pump malfunctioning. The incident was reported to DEPWS in Q2 Quarterly Recordable Report on 14 July 2023.</p> <p data-bbox="1207 505 2089 604">The IMP 3-4.2 Annual Groundwater Interpretative Report was submitted to <a href="mailto:Onshoregas.depws@nt.gov.au">Onshoregas.depws@nt.gov.au</a> on 14/05/2023, prior to the due date of 15/05/2023.</p> <p data-bbox="1207 651 2103 715">The report includes the required components of Ministerial Condition 10 (i) – (iv).</p>

Table 3 provides a systematic overview of interest holder performance against the environmental outcomes and environmental performance standards within the approved EMP.

**Table 3: Compliance with environmental outcomes and environmental performance standards**

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
1.	Conduct of the regulated activity does not create safety risks for the public or landholders	Operations carried out in a manner that does not create excessive dust	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Community complaints register shows no complaints received concerning dust generation within the reporting period 15/02/2023 – 14/02/2024.
2.		Speed limits posted on unsealed access tracks adhered to	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Incident management system shows no records of non-adherence to speed limits within the reporting period 15/02/2023 – 14/02/2024.
3.		Dust suppression activities undertaken on unsealed access roads during the dry season	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Records show use of water cart for dust suppression linked to site activities within the reporting period 15/02/2023 – 14/02/2024.
4.		Vehicle movements on publicly accessible roads carried out in a safe manner	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Community complaints register shows no complaints received concerning dangerous driving within the reporting period 15/02/2023 – 14/02/2024. Incident management system shows no records of dangerous driving or non-adherence to road rules.
5.		Well site fenced and signposted permanently with the well name, well number, major hazards and details of the interest holder	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Weekly checks confirm that well site is fenced and signage is compliance with the Code of Practice.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
6.		Well site remains fenced at all times to prevent access from livestock	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Weekly checks confirm well site is fenced throughout the reporting period 15/02/2023 – 14/02/2024.
7.	Sensitive receptors, significant conservation areas, or listed species or their habitat, is not permanently affected by conduct of the regulated activity	No vegetation cleared beyond the approved areas	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No vegetation clearing beyond existing areas was undertaken within the reporting period 15/02/2023 – 14/02/2024.
8.		No introduction of new weed species, or spread of existing weed populations as a result of conduct of the regulated activity	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<p>Site induction records show personnel inducted and induction materials include requirements related to weed impacts and prevention of spread.</p> <p>In February Petroleum Ops recorded buffel grass (<i>Cenchrus ciliaris</i>) on Carpentaria 1, however this could not be located by the Petroleum Weeds Officer during the DEPWS Weed Management Branch inspection in March 2023. A small clump of <i>Cenchrus pedicellatus</i> was observed which was subsequently removed. <i>Cenchrus pedicellatus</i> had not been previously recorded in the project area. It is unknown if the weed was spread via animal or as a conduct of the regulated activity. Incident was reported to DEPWS in Q1 Quarterly Recordable Report on 11 April 2023.</p>
9.		No fires in surrounding areas resulting from conduct of the regulated activity	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Site induction records show personnel inducted and induction materials include requirements related to impacts of wildfire and requirements to prevent offsite fires.



No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
				Incident management system shows no records of fires resulting from conduct of the regulated activity. Annual regional fire mapping undertaken 15 March 2023.
10.		All putrescible waste stored in vermin-proof enclosed receptacles	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Site induction records show personnel inducted and induction materials include waste segregation, storage and disposal requirements. Records show no incidences of introduced pests in waste storage area.
11.		All listed waste transported by licensed waste contractors	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Waste records from January and February 2024 show removal of Carpentaria 1 tank fluids offsite utilising licensed Waste Transporters: <ul style="list-style-type: none"> <li>• NT Recycling Solutions EPL 168-03</li> <li>• Neil Mansell Transport EPL 271</li> </ul>
12.		No waste is disposed of on-site	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Waste records from January and February 2024 show removal of Carpentaria 1 tank fluids offsite utilising licensed Waste Transporters: <ul style="list-style-type: none"> <li>• NT Recycling Solutions EPL 168-03</li> <li>• Neil Mansell Transport EPL 271</li> </ul>
13.		All waste segregated on-site according to whether it is hazardous, recyclable or for general disposal	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No waste generating activities were conducted onsite which required segregation (excluding wastewater and the tank decommissioning) throughout the reporting period 15/02/2023 – 14/02/2024.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
				Records of the volume and the method (trucks) used to transfer wastewater off-site for disposal were maintained during the Carpentaria 1 decommissioning.
14.		Wastewater from drilling stored in lined wastewater sumps	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Weekly checklist confirms wastewater sump liners are intact throughout the reporting period 15/02/2023 – 14/02/2024.
15.		All vehicles, plant and equipment maintained and operator per manufacturer requirements to prevent unnecessary noise or vibration creating disturbance	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Equipment is currently non-operational throughout the reporting period 15/02/2023 – 14/02/2024. Records of vehicle maintenance are kept.
16.		No impacts on landholders or the community regarding from lighting, noise or vibrations	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Community complaints register shows no complaints received concerning light spill, noise, or vibrations within the reporting period 15/02/2023 – 14/02/2024.
17.		All site lighting directed inward, where practicable	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Site is currently non-operational throughout the reporting period 15/02/2023 – 14/02/2024. No lights are utilised.
18.	Terrestrial environmental quality, including surface waters, is not permanently affected by conduct of the regulated activity	No ground disturbance occurs outside of designated areas approved for ground disturbance	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Site induction records show personnel inducted and induction materials include waste requirements related to clearing. Civil Reports dated from May 2023 – June 2023 confirm erosion sediment control device and fence maintenance was undertaken within

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
				the existing lease area, which is approved for ground disturbance.
19.		No vehicle movements outside of designated areas approved for ground disturbance	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Site induction records show personnel inducted and induction materials include prohibition of movement outside of approved areas.</p> <p>Incident management system has no records related to unauthorised movement off-site during the reporting period 15/02/2023 – 14/02/2024.</p>
20.		All liquid chemicals and hazardous substances stored within secondary impermeable containment at all times or bunded areas that can hold 110% of the largest container	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Site induction records show personnel inducted and induction materials include requirements related to the use and storage of hazardous chemicals.</p> <p>Weekly inspection records confirm all hazardous materials stored in compliance with relevant SDS (when onsite).</p>
21.		All storage vessels for wastewater and hazardous substances are maintained at 100% integrity	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<p>IMP 3-4.2 Q3 Quarterly Recordable Report submitted to DEPWS 12 October 2023 outlines one of the liners in the Carpentaria 1 tank leaking. No fluid was lost outside the tank, all fluid was contained within the secondary liner.</p> <p>Incident management system includes record of Carpentaria 1 liner tear.</p> <p>Records of the volume and the method (trucks) used to transfer wastewater off-site for disposal were maintained during the Carpentaria 1 decommissioning.</p>

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
22.		No instances of loss of containment of wastewater	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Incident management system shows no instances of loss of containment of wastewater during the reporting period 15/02/2023 – 14/02/2024.
23.		Freeboard for all wastewater sumps, flowback water tanks and produced water tanks maintained at all times	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	IMP 3-4.2 Q1 Quarterly Recordable Report submitted to DEPWS in April 2023 outlines freeboard for the Carpentaria 1 wastewater storage tank exceeded the wet season minimum requirement of 1.1m from the 5 March 2023 for a period of 25 days. Record of exceedance of the freeboard are included in the incident management system and evidence of corrective actions and preventative measures are included.
24.		All spills remediated immediately on discovery	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No spill occurred. Spills Register shows no record of spills during the reporting period 15/02/2023 – 14/02/2024. Site induction records show personnel inducted and induction materials include requirements to immediately remediate all spills to the ground.
25.		No water to be taken from surface water sources	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Site induction records show personnel inducted and induction materials include prohibition of use of surface water at any time. Incident management system includes no records of unauthorised use of surface water.
26.	The conduct of the regulated activity does not result in the over	Compliance with the groundwater extraction licence	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water extraction records submitted monthly online to “My Meter” portal in accordance with

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
	extraction or contamination of groundwater resources		<input type="checkbox"/> N/A	licence number GRF10316 for Carpentaria 1 water bore meters: <ul style="list-style-type: none"> <li>• 41678 – Control monitoring bore</li> <li>• 41800 – Impact monitoring bore</li> </ul>
27.		No contamination of aquifers from the regulated activities	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	IMP 3-4.2 Annual Groundwater Interpretive Report confirmed no notable change to groundwater quality between the Control Monitoring and Impact Monitoring Bores during 2023 – 2024. Report submitted to DEPWS 15/5/2024 for reporting period 15/02/2023 – 28/04/2024
28.	Local inland water quality is not permanently affected by conduct of the regulated activity	No unauthorised vehicle crossing of flowing creeks or watercourses	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Site induction records show personnel inducted and induction materials include prohibition of crossing of flowing creeks or watercourses, unless approved by Site Manager. Incident management system has no records related to unauthorised crossing of flowing creeks or watercourses during the reporting period 15/02/2023 – 14/02/2024.
29.	Minimise emissions, including greenhouse gases, created by conduct of the regulated activity	Operations carried out in a manner that does not create excessive emissions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Community complaints register shows no complaints received concerning excessive emissions from site. IMP 3-4.2 Annual Emissions Report 22-23 was submitted to DEPWS 29 September 2023. Scope 1 emissions: 0 tCO <sup>2</sup> -e
30.		All vehicles, plant and equipment maintained and operator per manufacturer requirements to minimise emissions	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Site is currently non-operational throughout the reporting period 15/02/2023 – 14/02/2024.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
31.		Flaring to be used rather than venting during production testing	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<p>Records of vehicle maintenance are kept.</p> <p>No production testing occurred during the reporting period 15/02/2023 – 14/02/2024. IMP 3-4.2 Annual Emissions Report 22-23 was submitted to DEPWS 29 September 2023. Scope 1 emissions: 0 tCO<sup>2</sup>-e</p>
32.		Gas leak detection, repair and notification to be conducted throughout all phases of the project that have live equipment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>IMP 3-4.2 Annual Flowback Report submitted to DEPWS 30 December 2023 confirms that well head pressure monitoring and 2023 bi-annual leak detection surveys were undertaken. No gas leaks were observed or repairs required during the reporting period 15/02/2023 – 14/02/2024.</p>

Table 4 demonstrates interest holder compliance with reporting requirements in the *Code of Practice: Onshore Petroleum Activities in the Northern Territory* (Code) and interest holder'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, Table 4 confirms 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 4: Compliance with mandatory monitoring and reporting requirements**

No	Reference	Requirement	Compliant	Evidence
1.	Code cl A.3.5  <i>EMP Section 10.4</i>	Geospatial information depicting areas cleared is to be provided to the Minister.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No clearing beyond existing areas was undertaken within the reporting period 15/02/2023 – 14/02/2024.
2.	Code cl A.3.6 (b)  <i>EMP Section 10.5 Appendix 09</i>	Weed management plan developed as part of the EMP must provide for ongoing weed monitoring.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Weed management plan developed as part of the EMP provides for ongoing weed monitoring as per IMP 3-4.2 Appendix 09 Table 5 Annual Action Plan. DEPWS Weed Management Branch Inspection and Imperial contractor survey, undertaken March 2023.
3.	Code cl A.3.7(a)vi  <i>EMP Section 10.6 Appendix 08</i>	The fire management plan must provide for annual fire mapping.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Appendix 08 – Fire Management Plan of the approved EMP includes the required clause in Section 8.4.7  Annual regional fire mapping undertaken 15 March 2023.
4.	Code cl A.3.9(c) Code cl A.3.9(e)	The rehabilitation plan requires progressive rehabilitation of significantly disturbed land	<input type="checkbox"/> Yes <input type="checkbox"/> No	Rehabilitation not commenced under IMP 3-4.2.

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

No	Reference	Requirement	Compliant	Evidence
	<i>EMP Appendix 12</i>	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.	<input checked="" type="checkbox"/> N/A	
5.	Code cl B.4.13.2(c)  <i>EMP Section 11.15.2</i>	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): a) total volume of hydraulic fracturing fluid pumped, 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 c) typical and maximum concentrations of chemicals or other substances used.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No hydraulic fluids pumped within the reporting period 15/02/2023 – 14/02/2024.
6.	Code cl B.4.13.2(k)iv  <i>EMP Section 11.15.4</i>	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.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No venting occurred within the reporting period 15/02/2023 – 14/02/2024.
7.	Code cl B.4.14.2(c)  <i>EMP Section 3.1.1</i> <i>EMP Section 11.4</i>	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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Carpentaria 1 WBIV - Revision 9, 16 May 2023 was submitted to DITT on 17 October 2023.



No	Reference	Requirement	Compliant	Evidence
8.	Code cl B.4.15.2(j) <i>EMP Section 11.17</i>	Complete and accurate records of the entire decommissioning procedure must be kept, with these records submitted as part of the legislative reporting requirements for the decommissioning of petroleum wells.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No decommissioning of petroleum wells occurred within the reporting period 15/02/2023 – 14/02/2024.
9.	Code cl C.6.1(d) <i>EMP Appendix 06 &amp; 07</i>	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	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	IMP 3-4.2 Annual Wastewater Report was submitted to <a href="mailto:Onshoregas.depws@nt.gov.au">Onshoregas.depws@nt.gov.au</a> on 28/02/2024 (submission date was outside the reporting period, however the report included the relevant reporting period of 16/2/23 – 15/2/24). Report contents were in accordance with requirements of Clause C.6.1 of the Code of Practice.
10.	Code cl C.7.1(d)ii <i>EMP Appendix 06</i>	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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Appendix 06 Wastewater Management Plan includes monitoring commitments in Section 8 Wildlife, stock and human interaction. Inspection records confirm monitoring has been undertaken within the reporting period 15/02/2023 – 14/02/2024.
11.	Code cl D.5.9.2(c) <i>EMP Section 16 Appendix 10</i>	Emissions from exploration, well construction (including during flowback) and workovers must be measured and reports submitted.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	IMP 3-4.2 Annual Emissions Report 22-23 was submitted to DEPWS 29 September 2023. Scope 1 emissions: 0 tCO <sup>2</sup> -e
12.	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.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No natural gas was vented or flared within the reporting period 15/02/2023 – 14/02/2024.

No	Reference	Requirement	Compliant	Evidence
13.	Reg 33	DEPWS must be 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.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<p>Incident management system includes no records of a reportable incident within the reporting period 15/02/2023- 14/02/2024.</p> <p>Imperial maintains its stance on correspondence submitted to DEPWS on 6 December 2023 regarding the Carpentaria 1 banded tank inner liner fault, and the classification of the incident as a recordable incident.</p>
14.	Reg 34	Reports on reportable incidents must be provided to DEPWS as soon 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.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<p>Incident management system includes no records of a reportable incident within the reporting period 15/02/2023- 14/02/2024.</p> <p>Imperial maintains its stance on correspondence submitted to DEPWS on 6 December 2023 regarding the Carpentaria 1 banded tank inner liner fault, and the classification of the incident as a recordable incident.</p>
15.	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).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Quarterly Recordable Reports for IMP 3-4 were sent to <a href="mailto:Onshoregas.depws@nt.gov.au">Onshoregas.depws@nt.gov.au</a> on:</p> <ul style="list-style-type: none"> <li>• Q1 11 April 2023, prior to the due date of 15 April</li> <li>• Q2 14 July 2023, prior to the due date of 15 July</li> <li>• Q3 12 October 2023, prior to the due date of 15 October</li> <li>• Q4 11 January 2024, prior to the due date of 15 January</li> </ul>
16.	Reg 37A  EMP Appendix 06	A report about flowback fluid from hydraulic fracturing must be provided to the Minister within 6 months of the flowback occurring.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Report not required during the reporting period 15/02/2023 – 14/02/2024.

No	Reference	Requirement	Compliant	Evidence
17.	Reg 37B  <i>EMP Appendix 06</i>	A report about produced water from hydraulic fracturing must be provided to the Minister within 6 months of the produced water being extracted.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Report not required during the reporting period 15/02/2023 – 14/02/2024.
18.	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.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No activity was undertaken to notify during the reporting period of 15/2/2023 – 14/02/2024 under IMP 3-4.2. Civil Reports dated from May 2023 – June 2023 include civil maintenance only, no new civil construction occurred.
19.	EMP Appendix 06 Table 10	Bore water tested for analytes (quality and quantity) monthly during bore operations.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No well operations during the reporting period 15/02/2023 – 14/02/2024.
20.	EMP Appendix 06 Table 10	Hydraulic fracturing fluid monitored post blender, before injection at each HF stage.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No hydraulic fracturing was undertaken during the reporting period 15/02/2023 – 14/02/2024.
21.	EMP Appendix 06 Table 10	Flowback fluid in each storage tank monitored weekly until fluid has stabilised then every six months for pH, electrical conductivity and analytes.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Certificates of analysis confirm Carpentaria 1 storage tank was sampled on 28 March 2023 and 8 August 2023 for pH, EC, and analytes. Fluid transfer and tank decommissioning commenced January 2024.
22.	EMP Appendix 06 Table 10	Flowback fluid in each storage tank monitored daily for water level and evaporation rates.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Carpentaria 1 wastewater storage tank was decommissioned 7 February 2024. Prior to that date, sensors were daily monitoring the water level (of which evaporation rate is calculated from).

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

No	Reference	Requirement	Compliant	Evidence
23.	EMP Appendix 06 Table 10	Produced water in all storage facilities monitored weekly until fluid has stabilised, then every six months for analytes.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No produced fluid received during the reporting period 15/02/2023 – 14/02/2024.
24.	EMP Appendix 06 Table 10	Produced water in all storage facilities monitored daily for water level and evaporation rates.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No produced fluid received during the reporting period 15/02/2023 – 14/02/2024.
25.	EMP Appendix 06 Table 10	Tank and pond inspection for bird carcasses daily during operations, weekly during non-operational periods.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Inspection records confirm monitoring undertaken on Carpentaria 1 tank and ponds during the reporting period 15/02/2023 – 14/02/2024.</p> <p>Fauna strike monitoring records one occurrence of a bird (thought to be a diamond dove) found deceased on 26 June 2023 in the Carpentaria 1 cutting pit.</p>
26.	EMP Appendix 06 Table 10	Carcasses present during tank and pond emptying during final decommissioning.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Photo records from Carpentaria 1 tank decommissioning show no carcasses during tank emptying.
27.	EMP Appendix 06 Table 10	Ad hoc bird and fauna observations and photos to be taken around wastewater tanks daily during operations, weekly during non-operational periods.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Inspection records confirm fauna monitoring undertaken on Carpentaria 1 tank and ponds during the reporting period 15/02/2023 – 14/02/2024.
28.	EMP Appendix 07 Table 6	Bureau of Meteorology monitored daily to identify any predicted significant rainfall events.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>BoM monitored daily during the reporting period 15/02/2023 – 14/02/2024.</p> <p>An automated email system was generated from 8 December 2023 to alert an internal compliance inbox with significant rainfall forecast events. Records of automated alerts are kept.</p>

No	Reference	Requirement	Compliant	Evidence
29.	EMP Appendix 07 Table 6	Visual inspection of ponds and tank levels inspected daily during operations during wet and dry seasons and weekly during dry season and periods of site inactivity. Levels, integrity and leak detection to be monitored. Telemetry monitoring for open pits over the wet season during periods of site inactivity accessible remotely.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Inspection records confirm monitoring undertaken on Carpentaria 1 tank and ponds during the reporting period 15/02/2023 – 14/02/2024.
30.	EMP Appendix 07 Table 6	Visual inspection of hydraulic stimulation fluids and flowback fluid tanks, banded areas and flowlines, daily during stimulation activities. Levels, integrity, and leak detection monitored.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No stimulation activities were undertaken during the reporting period 15/02/2023 – 14/02/2024.
31.	EMP Appendix 07 Table 6	Visual inspection of spill kits stock and location weekly during stimulation activities.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No stimulation activities were undertaken during the reporting period 15/02/2023 – 14/02/2024.
32.	EMP Appendix 07 Table 6	Tanks structural integrity and freeboard available (when wastewater is stored onsite). Visually check levels, integrity and check for leaks daily during operations during wet and dry seasons and weekly during dry season and periods of site inactivity.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Inspection records confirm tank structural integrity and freeboard levels were undertaken on Carpentaria 1 tank until it's decommissioning on 7 February 2024.
33.	EMP Appendix 07 Table 6	Visual inspection of chemical storage areas (when chemicals are stored on-site) daily during operations. Inspections includes leak detection and integrity of containment vessels and area.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No storage of chemicals on-site during the reporting period 15/02/2023 – 14/02/2024.

No	Reference	Requirement	Compliant	Evidence
34.	EMP Appendix 10 Table 1	Operation staff to carry personal calibrated gas detectors during every routine operational visit to well sites during ongoing well operations/ suspension.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No well operations during the reporting period 15/02/2023 – 14/02/2024.
35.	EMP Appendix 10 Table 1	Each well and equipment on a well pad to be inspected every six months for leaks using a US EPA Method 21.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>IMP 3-4.2 Annual Flowback Report submitted to DEPWS 30 December 2023 confirms that well head pressure monitoring and 2023 bi-annual leak detection surveys were undertaken.</p> <p>Records of leak detection survey undertaken 29 December 2023 at Carpentaria 1 utilising USA EPA Method 21. Next survey scheduled for June 2024.</p>

### 3. Overall performance

#### 3.1. Overview of performance

Table 5 provides a summary of the results of the performance assessment.

Table 5: Performance summary

Performance Status	Number	Percentage
Compliant	47	56%
Not Compliant	4	5%
Not Applicable	33	39%

#### 3.2. Overview of non-compliant items

Table 6 describes:

- 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, 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.

Table 6: Overview of non-compliance

Overview of non-compliance		
1. Ministerial approval conditions		
1	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Non-compliance with ministerial approval conditions? If yes, complete the sections below. If more than one instance, copy the rows below for each condition not met. If no, proceed to 2. Environmental Outcomes
2	Condition # and requirement	Ministerial Condition 10: In support of clause B.4.17.2 of the Code, the interest holder must provide to DEPWS, via <a href="mailto:Onshoregas.DEPWS@nt.gov.au">Onshoregas.DEPWS@nt.gov.au</a> , groundwater monitoring data and an interpretative report of groundwater quality based on the groundwater monitoring required to be conducted at the well site(s) in accordance with Table 6 of the Code. Groundwater data must be provided within one month of collection and be provided quarterly, in a format to be determined by DEPWS.  The interpretative report must be provided annually within three months of the anniversary of the approval date of the EMP and include:

		<ul style="list-style-type: none"> <li>i. Demonstration that there is no change to groundwater quality or level attributable to conduct of the regulated activity at the well site (s);</li> <li>ii. Interpretation of any statistical outliers observed from baseline measured values for each of the analytes;</li> <li>iii. Discussion of any trends observed; and</li> </ul> <p>A summary of the results inclusive of descriptive statistics</p>
3	Summary of non-compliance	<p>There was a delay in sampling at Carpentaria 1 in April 2023 due to a pump malfunctioning. This resulted in Carpentaria 1 being sampled on 17 May 2023 which was not quarterly (due in April 2023) as required under Ministerial Condition 10.</p> <p>The IMP 3-4.2 Annual Groundwater Interpretative Report was submitted to <a href="mailto:Onshoregas.depws@nt.gov.au">Onshoregas.depws@nt.gov.au</a> on 14/05/2023, prior to the due date of 15/05/2023.</p> <p>The report includes the required components of Ministerial Condition 10 (i) – (iv).</p>
4	Evidence used to detect non-compliance	Interest holder detected the non-compliance when the pump malfunctioned, and rescheduled Carpentaria 1 sampling to occur as soon as possible. Results of the sample were then submitted to DEPWS on 23 June 2023. This was within one month of receiving the laboratory sample analysis report.
5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Environmental harm arising from non-compliance</p> <p>If yes, complete section below.</p> <p>If no, proceed to row 7.</p>
6	If yes, describe nature and scale of impact and actions to remediate and rehabilitate	
7	If no, describe how determined no impact	A month delay in quarterly monitoring is an administrative non-compliance which does not cause environmental harm.
8	<input checked="" type="checkbox"/> Yes	Administrative non-compliance
9	If yes, describe nature of non-compliance	
10	Immediate corrective actions implemented	Carpentaria 1 was rescheduled and sampled on 17 May 2023.
11	Future corrective actions to prevent reoccurrence	Quarterly groundwater sampling to continue as planned. Pumps are included in EP187 equipment and asset register to ensure servicing occurs as per manufacturers requirements.
<b>2. Environmental outcomes</b>		
12	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Non-compliance with environmental outcome?</p> <p>If yes, complete the sections below. If more than one instance, copy the rows below for each outcome not complied with.</p> <p>If no, proceed to 3. Environmental Performance Standards</p>



3. Environmental performance standards:		
13	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Non-compliance with environmental performance standard? If yes, complete the sections below. If more than one instance, copy the rows below for each environmental performance standard not complied with. If no, proceed to 4. Regulatory Reporting or Record Keeping
14	Environmental performance standard	Table 3 of this report #8: No introduction of new weed species, or spread of existing weed populations as a result of conduct of the regulated activity
15	Summary of non-compliance	In February Petroleum Ops recorded buffel grass ( <i>Cenchrus ciliaris</i> ) on Carpentaria 1, however this could not be located by the Petroleum Weeds Officer during the DEPWS Weed Management Branch inspection in March 2023. A small clump of <i>Cenchrus pedicellatus</i> was observed which was subsequently removed. <i>Cenchrus pedicellatus</i> had not been previously recorded in the project area. It is unknown if the weed was spread via animal or as a conduct of the regulated activity.
16	Evidence used to detect non-compliance	Detected during weed survey.
17	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Environmental harm arising from non-compliance If yes, complete section below. If no, proceed to row 29.
18	If yes, describe nature and scale of impact and actions to remediate and rehabilitate	
19	If no, describe how determined no impact	Isolated incursion.
20	<input type="checkbox"/> Yes	Administrative non-compliance
21	If yes, describe nature of non-compliance	
22	Immediate corrective actions implemented	Weed was removed.
23	Future corrective actions to prevent reoccurrence	Weed training session was undertaken with Petroleum Weeds Officer Nathan Mills 24 August 2023. Meeting minutes recorded. Field Officers have also increased training and gained their Professional Ground Spray Applicator's Licence under Section 58 in the NT. This allows them to treat any small occurrences of weeds onsite as they are identified to reduce the risk of spread.
Environmental performance standards:		
24	<input checked="" type="checkbox"/> Yes	Non-compliance with environmental performance standard?

	<input type="checkbox"/> No	If yes, complete the sections below. If more than one instance, copy the rows below for each environmental performance standard not complied with. If no, proceed to 4. Regulatory Reporting or Record Keeping
25	Environmental performance standard	Table 3 of this report #21: All storage vessels for wastewater and hazardous substances are maintained at 100% integrity
26	Summary of non-compliance	IMP 3-4.2 Q3 Quarterly Recordable Report submitted to DEPWS 12 October 2023 outlines that a leak was detected between the liners at an above ground treatment tank at the Carpentaria 1 gas well pad location. No fluid was lost outside the tank, all fluid was contained within the secondary liner. The integrity of the bunded tank pad, the tank is located on, has been verified and is inspected by field staff daily. The residual wastewater was transferred offsite and the tank decommissioned February 2024.
27	Evidence used to detect non-compliance	Leak detection system.
28	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Environmental harm arising from non-compliance If yes, complete section below. If no, proceed to row 29.
29	If yes, describe nature and scale of impact and actions to remediate and rehabilitate	
30	If no, describe how determined no impact	The tank still had an intact liner and a bund that could contain 110% of the volume of the tank that acts as secondary containment.
31	<input type="checkbox"/> Yes	Administrative non-compliance
32	If yes, describe nature of non-compliance	
33	Immediate corrective actions implemented	The evaporation system for fluids was temporarily suspended. The integrity of the bunded tank pad was verified and inspected by field staff twice daily. Commenced fluid removal option assessment. Installed a mat at the bottom of the tank, below where the suspended evaporation pump was located, to provide a solid base for hoses to lay upon for future fluid removal and add weight to liner where the leak was possibly located. Continued to monitor fluid level with telemetry. Closely monitored weather forecast to understand rainfall risk. Transferred fluid offsite to a wastewater facility and decommissioned tank by February 2024.
34	Future corrective actions to prevent reoccurrence	The source of the leak could not be identified during decommissioning. Given Imperial were unable to identify the cause of the leak, no preventative actions to prevent reoccurrence were identified. Proposed EMP 5-1 includes flowlines that could be used to transfer fluids between tanks if there is an issue with a liner.

Environmental performance standards:		
35	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Non-compliance with environmental performance standard?</p> <p>If yes, complete the sections below. If more than one instance, copy the rows below for each environmental performance standard not complied with.</p> <p>If no, proceed to 4. Regulatory Reporting or Record Keeping</p>
36	Environmental performance standard	Table 3 of this report #23: Freeboard for all wastewater sumps, flowback water tanks and produced water tanks maintained at all times.
37	Summary of non-compliance	During a 14 day period of extreme rainfall during February/ March 2023, over 700mm of rain water was deposited in the Carpentaria-1 wastewater storage tank. A minimum wet season freeboard level of 1100mm was not achieved from 5 March 2023 for a period of 25 days in the Carpentaria 1 wastewater storage tank.
38	Evidence used to detect non-compliance	Sensor level data.
39	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Environmental harm arising from non-compliance</p> <p>If yes, complete section below.</p> <p>If no, proceed to row 41.</p>
40	If yes, describe nature and scale of impact and actions to remediate and rehabilitate	
41	If no, describe how determined no impact	Contingency freeboard of 1061mm was still available on 28 March 2023 which was ample capacity to contain multiple further heavy rainfall events. No risk of overtopping. No spills occurred.
42	<input type="checkbox"/> Yes	Administrative non-compliance
43	If yes, describe nature of non-compliance	
44	Immediate corrective actions implemented	A new lid was sourced and was installed onto the tank on 30th March 2023. The freeboard required for a tank with a lid is 500mm. No environmental impact occurred.
45	Future corrective actions to prevent reoccurrence	<p>The Carpentaria 1 tank has been decommissioned. There is no current plan to install an additional tank under IMP 3-4.</p> <p>To manage freeboard in tanks generally, Imperial are planning to proactively install above ground tanks with lids and/or having enclosed tanks available to transfer fluid, prior to potentially encountering issues with freeboard levels.</p>
4. Regulatory reporting or record keeping		
46	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Non-compliance with regulatory reporting or record keeping?

		If yes, complete the sections below. If more than one instance, copy the rows below for each regulatory reporting or record keeping regulatory requirement not met. If no, proceed to 5. Monitoring
47	Reporting or recording requirement	
48	Summary of non-compliance	
49	Evidence used to detect non-compliance	
50	Corrective actions implemented to improve reporting and record keeping	
<b>5. Monitoring</b>		
51	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Non-compliance with monitoring requirements? If yes, complete the sections below. If more than one instance, copy the rows below for each monitoring requirement not met.
52	Monitoring requirement	
53	Summary of non-compliance	
54	Evidence used to detect non-compliance	
55	Corrective actions implemented to ensure compliance with monitoring requirements	

## 4. Attachments

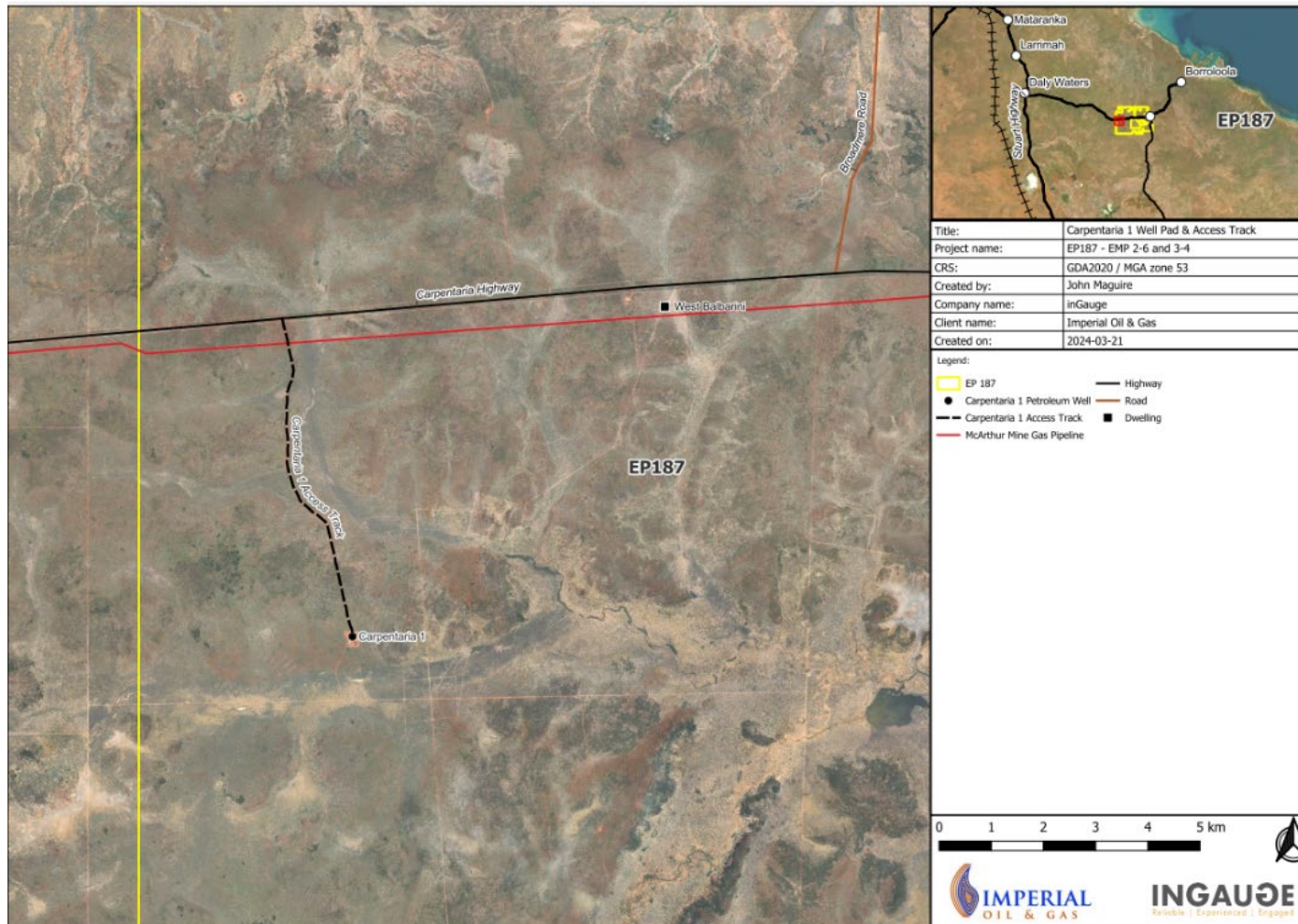


Figure 1: Project Location Map of Works Associated with IMP3-4

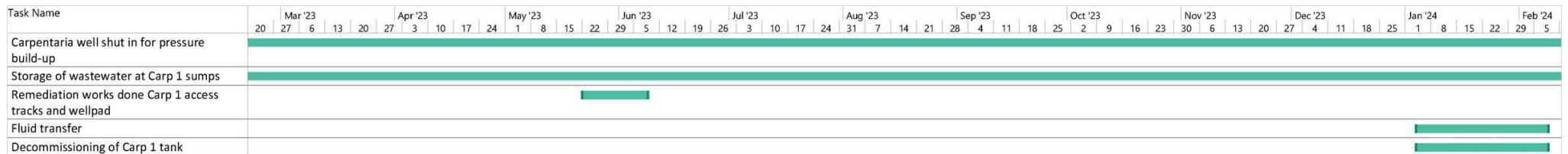


Figure 2: Gantt chart of regulated activities during the reporting period