

Regulatory Statement: Imperial Oil and Gas Pty Ltd compliance with 2021-2025 EP187 Work Program EMP

Purpose

Environment Management Plans (EMPs) are approved by the Minister with specific approval conditions allowing petroleum companies (Interest Holders) to undertake activities implementing controls necessary to protect the environment.

The environment regulator assesses compliance with the EMP by undertaking desktop reviews of monitoring data, reviewing documents such as [Annual Environment Performance Reports](#) (AEPR), [quarterly incident reports](#), rehabilitation reports and conducting site inspections.

Detection of non-compliance

During a site inspection in February 2023, the regulator identified unauthorised clearing incidents had occurred under Imperial Oil and Gas Pty Ltd's (Imperial) [2021-2025 EP187 Work Program EMP](#), specifically:

- A 1 hectare gravel pit (Figure 1) constructed North of the Carpentaria-4 well pad outside the areas identified in the EMP, as recorded in the [recordable incident report](#).
- A small corner portion (0.4 hectare) of the cleared Carpenaria-4 well pad (3 hectares) breaching the 100-metre riparian zone buffer of Relief Creek (Figure 2).

The Department confirmed the unauthorised clearing against drone imagery and GPS data and sent correspondence to Imperial, noting the observations. As a result, Imperial ceased use of the gravel pit and proposed rehabilitation measures for the well pad.

Non-compliance in AEPR

In January 2023, Imperial submitted its AEPR indicating compliance with their approved EMP. The AEPR is an annual report required by the regulator to determine whether interest holders have met their obligations under the EMP and to provide evidence of compliance or non-compliance.

Regulatory Actions

Imperial was issued an official warning and given a deadline to correct the AEPR to reflect the clearing non-compliances identified in the February 2023 site inspection. In January 2024 Imperial resubmitted their [AEPR](#) with details of the unauthorised clearing incidents.

During 2024, the regulator conducted further investigations into these two non-compliances to determine the level of environmental harm and whether prosecution would be an appropriate regulatory approach. No decision to file charges was made. Between February and November 2024, the regulator continued to follow-up on the non-compliances to determine current status of the site and any outstanding corrective actions required by Imperial.

This included reviews of submitted Rehabilitation Plans and follow-up site inspections that confirmed Imperial had commenced rehabilitation of the section of the well pad (Figure 2 & 3).

Regulatory outcomes

In 2024, Imperial submitted a new EMP ([Carpentaria Pilot Project](#)) which included the unauthorised gravel pit area. The plan was reviewed by NTG agencies and advice was received that the gravel pit was not located in a sensitive environment (e.g. high-value vegetation for threatened species, or areas with many hollow-bearing trees).

Approval of an EMP will only be granted if risks are demonstrated to be as low as reasonably practicable and reduced to acceptable levels. The EMP was approved on 12 November 2024 and no further action was taken by the Department for this incident.

In accordance with the Division's [Compliance and Enforcement Policy](#), in late 2024 the regulator determined prosecution would not be a proportionate response. The remaining unauthorised clearing of the well pad (buffer zone) was determined to have resulted in minor environmental impact, localised and temporary in nature. The rehabilitation of the buffer zone removes the potential for increased flooding from the well pad that previously had potential for increased sediment loads or release of contaminants into the waterway.

A Penalty Infringement Notice was issued to Imperial in March 2025 totalling \$3,280 for non-compliance with the plan (regulation 31(1) of the Petroleum (Environment) Regulations 2016). Since the incidents, Imperial has implemented corrective actions to prevent reoccurrence including requiring a Civil Disturbance Authorisation Checklist to ensure civil works are approved by the environmental compliance team prior to any on ground works.

Ongoing monitoring

The Department is and will continue to monitor the rehabilitation of the well pad area through site inspections and drone imagery.



Figure 1: Image of Gravel Pit taken November 2024 during a site inspection

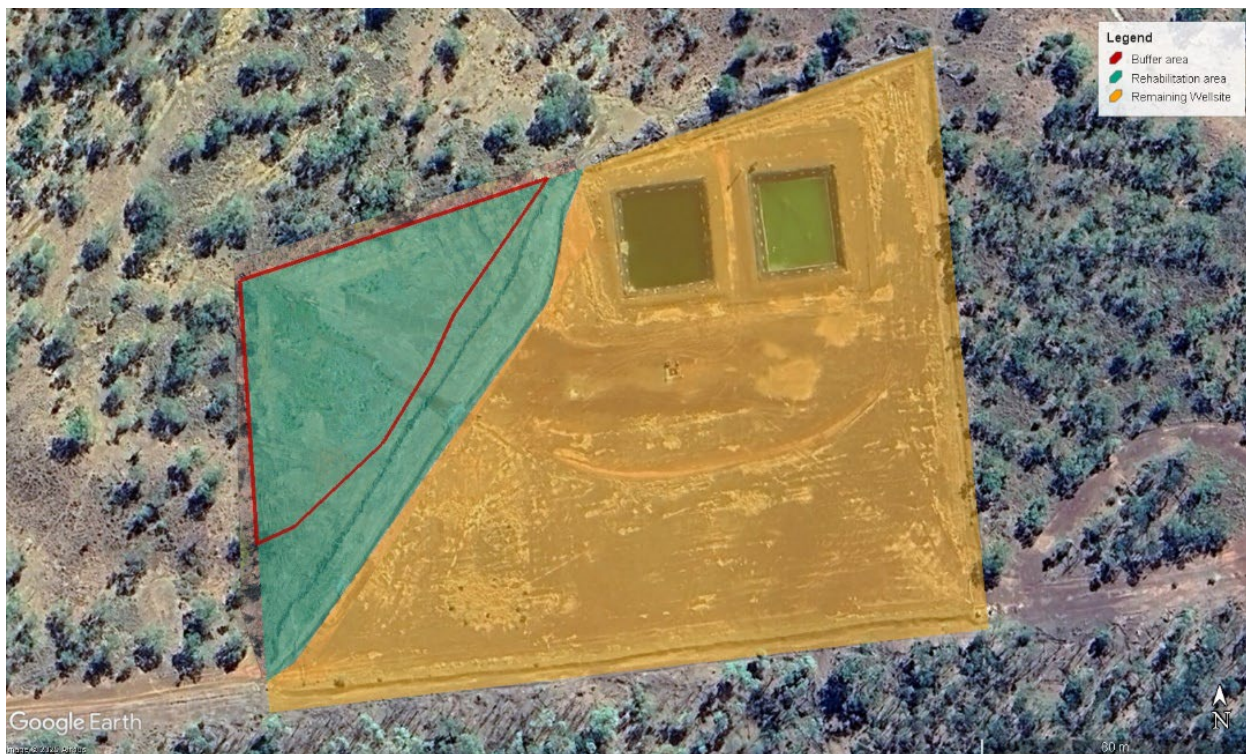


Figure 2: Carpentaria-4 well pad showing area of rehabilitation extending past the riparian buffer area



Figure 3: Image of Carpentaria-4 well pad rehabilitation area taken December 2024