

Modification Notice – Regulation 23

This form must be used to notify of a change to the existing environment described in an approved plan, under regulation 23 of the *Petroleum (Environment) Regulations 2016*. Forms that are incomplete or lacking supporting information will not be processed.

Information on the requirements related to changes to approved environment management plans is available in the Changes to Onshore Petroleum Environment Management Plans Guideline on the [Onshore Gas website](#).

Section 1 – Interest Holder Details										
For petroleum titles held by multiple interest holders, details must be completed for each interest holder. If insufficient room, please attach information to the Approved Form.										
Note: Regulation 23 notices must be submitted within 30 days of the change occurring.										
	Interest Holder 1		Interest Holder 2		Interest Holder 3		Interest Holder 4			
Interest Holder Name	Imperial Oil and Gas									
Nominated interest holder for all matters related to Notice?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No			
Authorisation given to an Operator to submit Notice?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input type="checkbox"/> No			
Submitted by	Name: Cassandra Schmidt		Position: VP Environment Compliance and Sustainability		Company: Beetaloo Energy		Operator: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Section 2 – EMP Details										
EMP Title	Carpentaria Pilot Project		Unique EMP ID	IMP 5-3	Change No.	5	Date	26/03/2026	Geospatial Files Attached	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> N/A

Brief Description	<p>This notification, submitted by Imperial Oil and Gas (Beetaloo Energy), advises of a change to the existing environment to the surveyed areas adjacent to the Carpentaria 4 well pad within EP 187, part of the approved Carpentaria Pilot Project (EMP IMP 5-3).</p> <p>On 23 October 2025, a targeted archaeological survey commissioned by Beetaloo Energy and undertaken by Wallis Heritage Consulting with Traditional Owners identified two previously undocumented cultural heritage sites of significance:</p> <ol style="list-style-type: none"> 1. EP187 Site 02: A large, medium-density open artefact concentration. The report notes the density of artefacts is greater than most others recorded in the vicinity, affording it higher archaeological significance than previously understood for the area. 2. EP187 Site 03: A Carved Tree (CMT), described as a rare site type in the region and of high archaeological significance. <p>Both sites are also considered by Traditional Aboriginal Owners to be of high cultural significance.</p> <p>The change was identified during pre-clearance surveys recommended in the approved EMP (IMP 5-3 Appendix 02, Cultural Heritage Report Recommendation 6.2.1). Beetaloo Energy confirms that while the environmental values have changed (due to the discovery of these sites), the existing environmental impact and risk assessments (specifically Risk #33 and Risk #35) and associated controls remain adequate to manage the potential impacts, and therefore no revision to the EMP is required.</p>
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Section 3			
<p>Has there been a change in the existing environment that could be affected by the regulated activity as described in the current EMP?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>IMP 5-3 has existing controls to protect cultural heritage when undertaking Regulated Activity.</p> <p>The controls listed in Risk #33 of IMP 5-3 Table 6.2-3 mitigate damage from occurring to cultural and heritage places and objects, irrespective of abundance of artefacts.</p>	<p>Supporting information attached</p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>Have the values or sensitivities of the environment relevant to the activity changed?</p> <p>Examples may include:</p> <ul style="list-style-type: none"> • discovery of new species; • increased cultural, heritage or ecological significance. 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>An archaeological survey on 23 October 2025 was commissioned by Beetaloo Energy and undertaken by Wallis Heritage Consulting and Traditional Owners at Carpentaria 4 proposed expansion area in EP 187. The subsequent report (Dardengo, M., Wallis, L.A. 2025 Archaeological Investigation of EP 187 Site 02, in the Carp4 Well Pad Expansion Area, Northern Territory V3. Unpublished report prepared for Beetaloo Energy, Northern Land Council and Traditional Aboriginal Owners) noted:</p> <p><i>“The EP187 Site 02 is a large, medium-density open artefact concentration of high archaeological significance. ... The density of artefacts on the site is greater than most others recorded in the vicinity and thus affords it higher significance than would be the case if there were fewer artefacts present.</i></p> <p><i>The EP187 Site 03 is a CMT, which is a rare site type in the region, and a type of site that is increasing at risk owing to natural attrition. It is of high archaeological significance.</i></p>	<p>Supporting information attached</p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Archaeological Investigation of EP 187 Site 02, in the Carp4 Well Pad Expansion Area, Northern Territory V3 attached.</p>			

		<p><i>Both EP187 Site 02 and EP187 Site 03 are considered by Traditional Aboriginal Owners to be of high cultural significance.”</i></p> <p>A copy of the full report is provided.</p>	
<p>Has the level of uncertainty or understanding about the environment changed?</p> <p>Examples may include:</p> <ul style="list-style-type: none"> • new scientific information; • revised baseline data or assessments. 	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	<p>Understanding of the environment has increased since IMP 5-3 was drafted and approved. Additional targeted surveys have been undertaken at Carpentaria 4 well pad expansion area as recommended in IMP 5-3 Appendix 02. Cultural Heritage Assessment Recommendation 6.2.1.</p>	<p>Supporting information attached</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>Confirm that the change:</p> <ul style="list-style-type: none"> • Does not introduce a new environmental impact or risk • Does not increase existing environmental risks or impacts beyond those covered in the approved EMP • Does not require new or additional controls beyond those described in the approved EMP 	<p><input checked="" type="checkbox"/> Confirmed</p> <p><input checked="" type="checkbox"/> Confirmed</p> <p><input checked="" type="checkbox"/> Confirmed</p>	<ul style="list-style-type: none"> • The higher density of artefacts does not introduce a new environmental impact or risk. The risk of damage to cultural and heritage places and objects is assessed under Risk #33 and Risk #35 in IMP 5-3 Table 6.2-3. All controls remain in place. • The higher density of artefacts does not increase a new environmental risk or impact beyond those covered in the approved EMP. The risk of damage to cultural and heritage places and objects is assessed under Risk #33 and Risk #35 in IMP 5-3 Table 6.2-3. All controls remain in place. • The higher density of artefacts does not currently require new or additional controls beyond those described in the approved EMP. Existing controls include: site selection in accordance with the AAPA Authority Certificate, the Cultural Heritage Management Plan, cultural monitors prior to land-clearing activity, cultural site inductions, cultural training and Imperial’s cultural heritage procedure. These controls mitigate the risk of damage to cultural heritage regardless of artefact frequency. Recommendation 5 of the report <i>“The collective preference of Traditional Aboriginal Owners (i.e. those who participated in the survey and who participated in the meeting held on 9 December 2025) is for Beetaloo Energy Australia to re-design their expansion works to entirely avoid the EP187 Site 02, so this site is conserved in situ without disturbance.”</i> may require a Regulation 22 notification in the future when well pad expansion works are confirmed for Carpentaria 4 	<p>Supporting information attached</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

		<p>well pad. No expansion works will be undertaken at Carpentaria 4 well pad prior to a Reg 22 submission. EMP section 4.16.4 commits to “There will be appropriate signage, and induction and ongoing training that will be delivered in relation to the exclusion zone”. Signage, inductions (including exclusion zones) and ongoing training has been updated to include information included in recent archaeological surveys.</p>	
<p>If you are unable to confirm all the above, provide details (note that a Regulation 17 or 22 submission may be required):</p>	<p>All confirmed.</p>	<p>Not applicable at current stage of operations.</p>	<p>Supporting information attached <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

Submit this notice and supporting information to Onshoregas.DLPE@nt.gov.au