

Date EMP was approved: 26 September 2019

Dear Ms Strohmayr,

In accordance with Regulation 22 of the Petroleum (Environment) Regulations 2016, Imperial Oil & Gas Pty Ltd propose to modify the regulated activity for the above EMP, and is writing to the Minister to give notice and specify details of the proposed modification.

The modification of the regulated activity relates to a commitment in the Rehabilitation Plan and Erosion and Sediment Control Plan:

- Conduct return of topsoil and vegetation debris were practicable (p147)
- Respreading windrowed grass, branches, rocks and other vegetation over exposed areas (p647)

At the request of pastoralists in the area, Imperial is proposing to respread windrowed grass, and return topsoil and other debris, but exclude the return of large branches, felled trees and rocks, for 54km of the 130km of exposed area. The pastoralists requested this to enable vehicle access along the lines for ease of management on their holdings.

Details of the proposed modification:

Imperial will rehabilitate all cleared areas of seismic program as per the EMP conditions, returning topsoil and vegetation debris, windrowed grasses, branches, rocks and other vegetation over the disturbed area.

In the areas that the pastoralists have requested Imperial to leave accessible for ease of management Imperial requests to modify this by leaving felled trees, large branches and large rocks clear of the disturbance footprint, all other rehab works in these areas will remain the same.

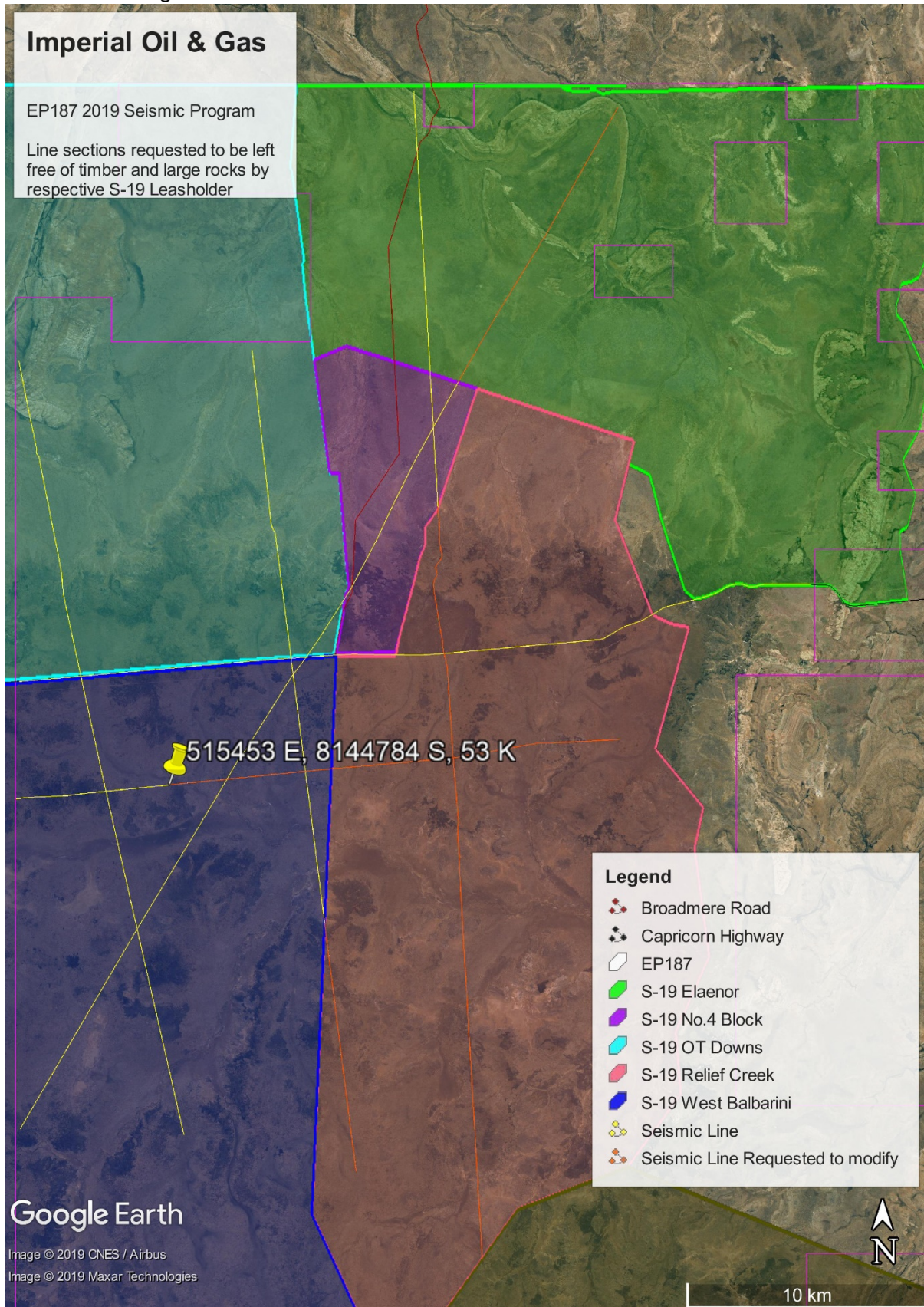
All rehabilitation performance objectives other than the respreading of large branches, felled trees and rocks back onto the disturbed seismic line footprint for these areas remain:

- No weeds or invasive species
- *No long-term loss of habitat due to seismic activities*
- *Rehabilitation of disturbed area to re-establish a stable landform and self-sustaining ecosystem*
- *Reestablishment of vegetation,*
 - *The vegetation in these areas is likely to be limited to groundcover, grasses and/or smaller shrubs.*

Imperial will monitor the modified sections that do not have the large branches, felled trees and rocks respread back onto the disturbed seismic line footprint to the same standard as the balance of the seismic lines, in line with our EMP requirement to ensure that the above rehabilitation objectives are met. Photo monitoring will be undertaken of the seismic lines at control points to measuring change in the natural environment, these points will be located in both the modified and unmodified sections of seismic lines. A series of photos will be taken from a fixed location at regular intervals with the aim of visually showing improvement in vegetation condition.

Site location details (map)

Please find below a map showing the line sections to be modified under this request relative to their S-19 lease holdings.



Environment

Imperial believes that this modification request will not materially affect the revegetation of grasses and small shrubs or the risk of erosion for those line sections. Rehabilitation of wheel tracks will occur rapidly due to the light footprint of the vehicles and Imperial's expectation is that will not be affected by the requested modification and that it will be complete by the end of the following wet season.

Cultural Heritage

Imperial believes that this modification will not materially impact on any Cultural Heritage values in the vicinity.

Stakeholder Engagement

Imperial has had requests from the following S-19 leaseholders;

- [REDACTED] of Relief Creek
 - Requested to leave the pushed timber clear of all the seismic lines
 - Approximately 34km
 - Verbal and then via email (email attached)
- [REDACTED] of West Balbarini
 - Requested to leave the pushed timber clear of line 2 (parallel and south of the Capricorn Highway) from his eastern boundary to point that is approximately at survey point 421 (coordinates marked on attached map)
 - Approximately 6km
 - Verbal, we have asked for a request via an email
- [REDACTED] of Eleanor, No.4 Block and O T Downs
 - Requested to leave the pushed timber clear of line 6 (longest line from South West corner through to North East corner of program) from the Eleanor boundary through to where we stopped short on the program due to terrain.
 - Approximately 12km
 - Verbal, we have asked for a request via an email

If this request to modify is approved Imperial will notify the S-19 leaseholders that the sections requested will be left clear of felled trees, large branches and large rocks and that this does not authorise them to further clear or modify these areas.

DIPR Security

Imperial believes that this modification has been adequately covered under the existing security held by DIPR ref "Rehabilitation security for EMP for 2019 Seismic Work Program EP187 – Imperial Oil and Gas"

RISK

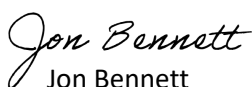
Imperial has reviewed the EMP and the proposed modification will not result in an increase in likelihood, consequence or overall risk ranking.

The risk mitigation controls outlined in the existing EMP will not require any amendment to accommodate the modification.

The modification has not caused a new or increased in environmental risk or impact to the site.

Thankyou for your consideration.

Regards


Jon Bennett