

Date: 26/06/2020

EMP Document Reference Number: IMP2-04

EMP Title: Imperial 2020 Drilling Program NT Exploration Permit (EP)187

Date EMP was approved: 02 March 2020

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.

Modification requested:

The modification of the regulated activity relates to the water bores to be utilised for the Drilling activities:

- Water will be sourced from the existing water bore (RN027848) located at Easting 519346 Northing 8149884. (p66)

Imperial is proposing to drill two water bores on the Carpentaria 1 wellpad, for both water supply for the EMP and water supply and impact monitoring of future EMP activities.

Reason for the proposed modification:

This modification will allow water requirements for the EMP activities to be sourced directly from the Carpentaria 1 wellpad, negating the need to cart water from the existing water bore (RN027848). Changing the water source location to the Carpentaria 1 wellpad will reduce the amount of heavy vehicle movements on the Carpentaria Highway between RN027848 and the Carpentaria 1 intersection over the drilling program significantly.

This modification will also facilitate the transfer of the groundwater monitoring program from water bores RN039574 and RN027848, to directly on the Carpentaria 1 wellpad.

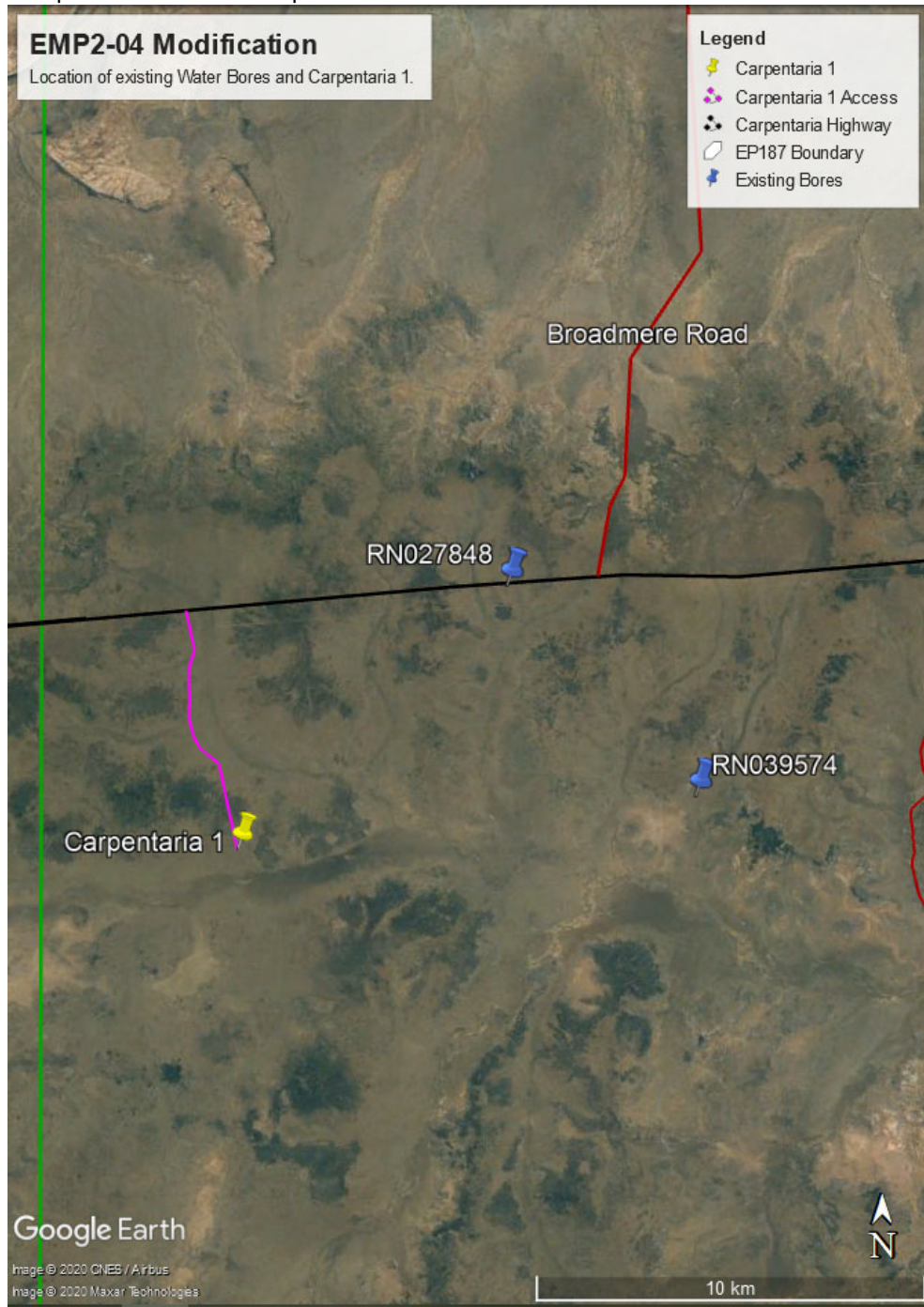
Risks and controls for works under this modification.

Imperial has reviewed the EMP, and has assessed the possibility of new environmental impact or environmental risk not provided for in the current EMP for the activity. This assessment has shown that the proposed modification will not increase the likelihood, consequence or overall risk ranking. A summary of the potential risks and impacts, along with their relevant controls, is presented below.

Potential Risk or Impact	Control
Bore placement less than 1km from the closest designated bore.	The closest designated bore to the proposed Water Bores is RN RN027848, which is 9.5km to the northeast. (as shown in attached map)
Bore works undertaken without a bore work permit issued by the Controller of Water Resources.	The proposed Water Bore works will be carried out under Bore Work Permit Number BCPD06419, which Imperial received approval for on 10/06/2020.
Additional area of disturbance for the proposed Water Bores.	The proposed Water Bores are to be located on the well site, within the footprint approved for ground disturbance in the above EMP.
Additional area of disturbance for the access track to the Water Bores.	The proposed Water Bores will be accessed via the alignment of the Carpentaria 1 access track, within the footprint approved for ground disturbance in the above EMP.
Water Bores not constructed in a compliant manner.	Water bores to be constructed in compliance with Minimum Construction Requirements for Water Bores in Australia, Fourth Edition, and in line with the Preliminary Guideline: Groundwater Monitoring Bores for Exploration Petroleum Wells in the Beetaloo Sub-basin.
Non authorised water extraction.	The proposed Water Bores to be added as a water extraction point to Imperial's Licence to take Groundwater No: GRF10313, which was issued on 15/05/2020. No water will be taken until this addition has been made to GRF10313.
Water extracted from an unauthorised aquifer.	Imperial currently has GRF10316, which permits extraction from the Gum Ridge Formation, should the new bores target a different aquifer, Imperial must apply for a new groundwater extraction licence.
Works carried out without correct APPA approval.	The proposed Water Bores are covered under the AAPA certificate associated with this EMP.
Works carried out without correct Landowner approvals.	The proposed Water Bores are covered under the Landowner Approvals associated with this EMP.

Site location details (map)

Please find below a map showing the location of the existing water bores and the Carpentaria 1 Wellpad covered in this request.



Thank you.

Regards

Jon Bennett