

Annual Environmental Performance Report

EMP title	2021-2025 EP 187 Work Program
Unique EMP ID	IMP 4-3.9
EMP approval date	17/10/2021
AEPR period	17 October 2023 to 16 October 2024
Petroleum title number/s	EP 187

Document title	Annual Environmental Performance Report
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Version Control

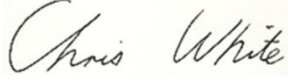
Date	Rev	Reason for Amendment	Author	Checked	Approved
13/01/2025	1	Initial submission	RL	TS	CW

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 publicly 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*.

Signature	
Name of person signing on behalf of interest holder/s	Chris White
Position	Chief Operations Officer
Company	Empire Energy Group Limited
Address	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)
DLPE	Department of Lands, Planning and Environment
DME	Department of Mining and Energy
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.¹ 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	2021-2025 EP187 Work Program
Unique EMP ID	IMP 4-3.9
EMP approval date	17/10/2021
AEPR period	17 October 2023 to 16 October 2024
Petroleum title number/s	EP187
Regulation 22 Notices	
Date Acknowledged	Scope
IMP 4-3.1 November 2021	Anthony Lagoon aquifer
IMP 4-3.2 December 2022	Re-use of flowback fluid from the Carpentaria 2-H well for hydraulic fracturing of the Carpentaria 3-H well.
IMP 4-3.3 March 2023	EPT extension for Carpentaria 2-H and Carpentaria 3-H
IMP 4-3.4 September 2023	Gravel Pit Batters
IMP 4-3.5 December 2023	Waste Transportation
IMP 4-3.6 December 2023	Emergency Response Plan
IMP 4-3.7 July 2024	Tank Bunding
IMP 4-3.8 September 2024	Change to Number of Closed Topped Storage Tanks
IMP 4-3.9 October 2024	Waste Water Filtration
Regulation 23 Notices	
Date Acknowledged	Scope
NA	NA

¹ Petroleum (Environment) Regulations 2016 (NT) sch 1, item 11.

Location of Regulated Activity	
<input checked="" type="checkbox"/>	Figure attached showing location of regulated activity at end of Report (Figure 2)
Regulated activities conducted during the reporting period (list regulated activities conducted, add or remove rows as required)	
1	Ongoing civil maintenance of access tracks
2	Wastewater storage at Carpentaria 2/3/5 well pad: throughout reporting period 17 October 23 – 16 October 24
3	Wastewater storage at Carpentaria 4 well pad: throughout reporting period 17 October 23 – 16 October 24
4	Earthworks on Carpentaria 2/3/5 well pad
5	Construction of Tank 2 on Carpentaria 2/3/5 well pad
<input checked="" type="checkbox"/>	Gantt chart attached showing the period each regulated activity listed above was conducted

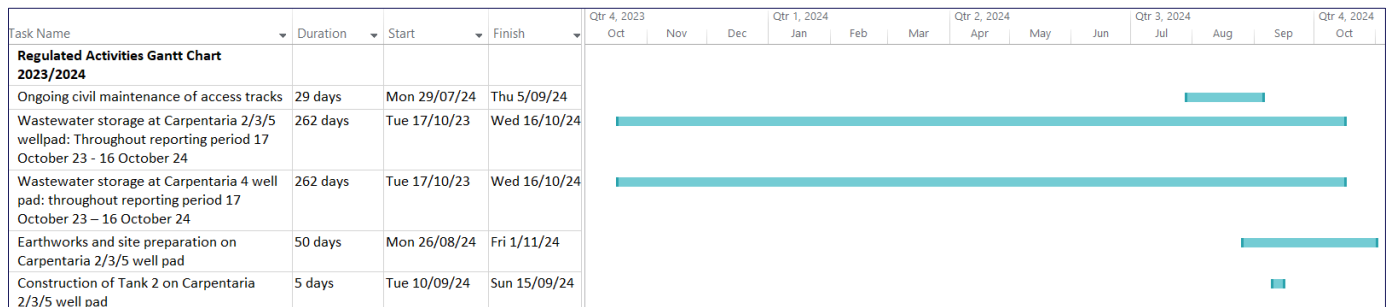


Figure 1 Regulated Activities Gantt Chart during October 2023 – October 2024

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

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: Compliance with Ministerial approval conditions

No	Ministerial Condition	Compliant	Evidence
1.	<p>Condition 1: The interest holder must submit to the Department of Environment, Parks and Water Security (DEPWS), via Onshoregas.DEPWS@nt.gov.au the following:</p> <p>(i) Notification of the commencement of hydraulic fracturing activities prior to commencement.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Commencement of hydraulic fracturing activities did not occur during the reporting period 17 October 2023 – 16 October 2024 of this AEPR.

No	Ministerial Condition	Compliant	Evidence
2.	<p>Condition 1: The interest holder must submit to the Department of Environment, Parks and Water Security (DEPWS), via Onshoregas.DEPWS@nt.gov.au the following:</p> <p>(ii) An updated timetable for the regulated activity that is to be provided on the last day of each quarter (being 31 March, 30 June, 30 September and 31 December each year), that identifies activities completed in the current quarter and:</p> <ul style="list-style-type: none"> • regulated activities in the next quarter, including duration; • activities in the next quarter based on commitments in the EMP relevant to the stage of the activity, including duration; • due dates for satisfaction of Ministerial approval conditions in the next quarter; and • due dates for regulatory reporting in the next quarter 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>Timetables for the regulated activity were provided via email to Onshoregas.DEPWS@nt.gov.au on:</p> <ul style="list-style-type: none"> • 30 December 2023 (due 31 December 2023) • 28 March 2024 (due 31 March 2024) • 28 June 2024 (due 30 June 2024) • 27 September 2024 (due 30 September 2024) <p>Which included -</p> <ul style="list-style-type: none"> • Regulated activities forecast for each quarter, including duration; • Activities in the next quarter based on commitments in the EMP, including duration; • Due dates for satisfaction of Ministerial approval conditions for each quarter; and • Due dates for regulatory reporting in each quarter

No	Ministerial Condition	Compliant	Evidence
3.	<p>Condition 1: The interest holder must submit to the Department of Environment, Parks and Water Security (DEPWS), via Onshoregas.DEPWS@nt.gov.au the following:</p> <p>(iii) During civil works (and noting civil works is taken to include any type of earth moving, land clearing, installation of gravel pits, establishment of well pads, establishment of access tracks and installation of wastewater flowlines) and seismic activities, weekly reports indicating:</p> <ul style="list-style-type: none"> • the status and progress of vegetation clearing and civil works at each location the activity is conducted; • the outcome of any assessments undertaken by a suitably qualified person of geomorphic and hydrological investigations and the conclusion as to whether directional drilling is required, in advance of installing wastewater flowlines across a stream; • the status and progress of seismic activities • any fires potentially threatening the activity from external or internal sources • the outcome of inspections of erosion and sediment control measures, and corrective actions taken; and • the outcome of inspections and risk assessments for determining suitability of use of unsealed roads by any vehicle or machinery other than a light vehicle in the wet season 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>Civil reports were provided via email to Onshoregas.DEPWS@nt.gov.au on:</p> <ul style="list-style-type: none"> • 19 October 2023 • 24 May 2024 • 28 June 2024 • 8 August 2024 • 16 August 2024 • 23 August 2024 • 30 August 2024 • 6 September 2024 • 13 September 2024 • 20 September 2024 • 27 September 2024 • 4 October 2024 • 11 October 2024 • 18 October • 25 October 2024 <p>Reports included the relevant details pending on the civil activity.</p>

No	Ministerial Condition	Compliant	Evidence
4.	<p>Condition 1: The interest holder must submit to the Department of Environment, Parks and Water Security (DEPWS), via Onshoregas.DEPWS@nt.gov.au the following:</p> <p>(iv) During drilling, daily on-site reports, to be consolidated and provided weekly, indicating:</p> <ul style="list-style-type: none"> • status and progress of drilling at each location; • freeboard available in drill cutting pits (in cm); and • the outcome of general site inspections relevant to drilling and waste, and corrective actions taken. 	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> N/A</p>	<p>Drilling did not occur during the reporting period 17 October 2023 – 16 October 2024 of this AEPR.</p>

No	Ministerial Condition	Compliant	Evidence
5.	<p>Condition 1: The interest holder must submit to the Department of Environment, Parks and Water Security (DEPWS), via Onshoregas.DEPWS@nt.gov.au the following:</p> <p>(v) During hydraulic fracturing and flowback, weekly reports indicating:</p> <ul style="list-style-type: none"> • status and progress of hydraulic fracturing; • weekly measurement of stored volume (in ML) and freeboard available (in cm) of wastewater storage tanks, unless operated in the wet season, during which it must be measured daily; • volume of wastewater transferred via wastewater flowlines, including records of inflow and outflow (in L) for each transfer; and • the outcome of general site inspections relevant to hydraulic fracturing and waste, and corrective actions undertaken. 	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> N/A</p>	<p>Hydraulic fracturing did not occur during the reporting period 17 October 2023 – 16 October 2024 of this AEPR.</p>

No	Ministerial Condition	Compliant	Evidence
6.	<p>Condition 1: The interest holder must submit to the Department of Environment, Parks and Water Security (DEPWS), via Onshoregas.DEPWS@nt.gov.au the following:</p> <p>(vi) During the wet season, weekly reports indicating:</p> <ul style="list-style-type: none"> • the outcome of inspections of erosion and sediment control measures, and corrective actions taken; • the outcome of daily inspections of any secondary containment in use, and corrective actions taken; • any halt to the regulated activity due to wet season conditions; and • daily measurements of freeboard available in drill cutting pits and wastewater treatment tanks (in cm) whenever operational. 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>Weekly wet season reports were provided via email to Onshoregas.DEPWS@nt.gov.au:</p> <p>From the 20 October 2023 – 28 March 2024 and then from the 04 October 2024 – ongoing.</p> <p>Which indicated:</p> <ul style="list-style-type: none"> • The outcome of inspections of erosion and sediment control measures, and corrective actions taken; • The outcome of daily inspections of any secondary containment in use, and corrective actions taken; • Any halt to the regulated activity due to wet season conditions; and • Daily measurements of freeboard available in drill cuttings pits and wastewater treatment tanks

No	Ministerial Condition	Compliant	Evidence
7.	<p>Condition 1: The interest holder must submit to the Department of Environment, Parks and Water Security (DEPWS), via Onshoregas.DEPWS@nt.gov.au the following:</p> <p>(vii) For avoidance of doubt, if wastewater is present in tanks or flowlines, or drill cutting pits contain waste drill fluids and cuttings, these are considered to be operational. Reports must continue to be provided as per parts iv and v above, irrespective of whether there is manned activity occurring on site if the wastewater infrastructure is operational.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>Weekly reports were provided via email to Onshoregas.DEPWS@nt.gov.au from: 20/10/2023 - 18/10/2024 (week ending 13/10/2024) Which included:</p> <ul style="list-style-type: none"> • freeboard available in tanks and drill cutting pits (in cm); and • the outcome of general site inspections and proposed corrective actions.
8.	<p>Condition 1: The interest holder must submit to the Department of Environment, Parks and Water Security (DEPWS), via Onshoregas.DEPWS@nt.gov.au the following:</p> <p>(viii) In the event that multiple regulated activities under the EMP are being conducted concurrently, the weekly submission of consolidated daily reports may be further consolidated to a single submission, but must clearly identify the locations and activities to which the information pertains, in relation to each item listed in conditions iii to vi above, inclusive.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>	<p>Weekly reports were provided via email to Onshoregas.DEPWS@nt.gov.au that identified the locations and activities to which the information pertains, in relation to each item listed in conditions iii to vi above. Weekly reports were not consolidated during the reporting period of this AEPR.</p>

No	Ministerial Condition	Compliant	Evidence
9.	<p>Condition 2: 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). With respect to the reports required to submitted in accordance with item 11(1)(b) in schedule 1 of the Petroleum (Environment) Regulations 2016 (NT):</p> <p>(i) The first report must cover the 12-month period from the date of the approval, and be provided within 3 calendar months of the end of the reporting period.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>IMP 4-3 AEPR was submitted to Onshoregas.DEPWS@nt.gov.au on 16 January 2024.</p> <p>The report covered a 12-month reporting period from October 2022 – October 2023 and was provided within the 3 calendar months of the end of the reporting period.</p> <p>The report was revised following DEPWS feedback and resubmitted on 6 June 2024.</p>
10.	<p>Condition 2: 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). With respect to the reports required to submitted in accordance with item 11(1)(b) in schedule 1 of the Petroleum (Environment) Regulations 2016 (NT):</p> <p>(ii) Each report must align with the template and Guideline 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.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>IMP 4-3 AEPR submitted aligns with the template and Guideline prepared by DEPWS.</p>

No	Ministerial Condition	Compliant	Evidence
11.	<p>Condition 3: In support of clause D.6.2 of the <i>Code of Practice: Onshore Petroleum Activities in the Northern Territory</i>, 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 from conduct of the regulated activity estimated and reported under the Commonwealth <i>National Greenhouse and Energy Reporting Act 2007</i> versus predicted emissions in the EMP.⁴ The emissions report should include:</p> <p>(i) a summary of all regulated activities conducted which have contributed to greenhouse gas emissions during the reporting period; and</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>An Annual Emissions Report was submitted to Onshoregas.DEPWS@nt.gov.au on 19 September 2024.</p> <p>The report included a summary of all regulated activities conducted which have contributed to greenhouse gas emissions during the reporting period.</p>
12.	<p>Condition 3: In support of clause D.6.2 of the <i>Code of Practice: Onshore Petroleum Activities in the Northern Territory</i>, 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 from conduct of the regulated activity estimated and reported under the Commonwealth <i>National Greenhouse and Energy Reporting Act 2007</i> versus predicted emissions in the EMP.⁴ The emissions report should include:</p> <p>(ii) explanation of differences between actual and predicted emissions with reference to all parts of the regulated activity with potential to create greenhouse gas emissions.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>The Annual Emissions Report submitted on 19 September 2024 included an explanation of differences between actual and predicted emissions.</p>

No	Ministerial Condition	Compliant	Evidence
13.	<p>Condition 4: Audits of compliance must be undertaken by a suitably accredited, qualified and independent person and the audit report provided to DEPWS via Onshoregas.DEPWS@nt.gov.au, no later than 4 weeks after the completion of the audits. The following must be adhered to:</p> <p>(i) An audit focused on implementation of the Erosion and Sediment Control Plan must be conducted no later than 2 weeks after the establishment of the first well pad, and again no later than 2 weeks after the establishment of another well pad.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<p>The requirements for this Ministerial condition (ESCP audits after the establishment of the first well pad under IMP 4-3, and again after the establishment of another well pad) occurred prior to the reporting period 17 October 2023 – 16 October 2024 of this AEPR.</p>
14.	<p>Condition 4: Audits of compliance must be undertaken by a suitably accredited, qualified and independent person and the audit report provided to DEPWS via Onshoregas.DEPWS@nt.gov.au, no later than 4 weeks after the completion of the audits. The following must be adhered to:</p> <p>(ii) An audit focused on key controls listed in the EMP relevant to drilling activities must be commenced in the 24 hours prior to commencement of drilling of the first exploration well, and again in the 24 hours prior to commencement of drilling another exploration well.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<p>The requirements for this Ministerial condition (drilling audits commenced in the 24 hours prior to commencement of drilling the first exploration well (Carpentaria 2), and again in the 24 hours prior to commencement of drilling another exploration well (Carpentaria 3) occurred prior to the reporting period 17 October 2023 – 16 October 2024 of this AEPR.</p>

No	Ministerial Condition	Compliant	Evidence
15.	<p>Condition 4: Audits of compliance must be undertaken by a suitably accredited, qualified and independent person and the audit report provided to DEPWS via Onshoregas.DEPWS@nt.gov.au, no later than 4 weeks after the completion of the audits. The following must be adhered to:</p> <p>(iii) An audit focused on key controls listed in the EMP relevant to management of wastewater and containment of contaminants, including the Wastewater Management Plan and the Spill Management Plan, must be conducted during flowback and extended production testing on the first exploration well hydraulically fractured, and again on another exploration well hydraulically fractured</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>	<p>The requirements for this Ministerial condition (audits conducted during flowback and extended production testing on the first exploration well hydraulically fractured (Carpentaria 2), and again on another exploration well hydraulically fractured (Carpentaria 3)), occurred prior to the reporting period 17 October 2023 – 16 October 2024 of this AEPR.</p>
16.	<p>Condition 4: Audits of compliance must be undertaken by a suitably accredited, qualified and independent person and the audit report provided to DEPWS via Onshoregas.DEPWS@nt.gov.au, no later than 4 weeks after the completion of the audits. The following must be adhered to:</p> <p>(iv) The first audit for each of the Erosion and Sediment Control Plan, drilling and hydraulic fracturing audits must:</p> <p>a. be conducted by an independent auditor; and b. include a field-based inspection by the independent auditor to verify implementation of controls.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>	<p>The requirements for this Ministerial Condition (first audits) occurred prior to the reporting period 17 October 2023 – 16 October 2024 of this AEPR.</p>

No	Ministerial Condition	Compliant	Evidence
17.	<p>Condition 4: Audits of compliance must be undertaken by a suitably accredited, qualified and independent person and the audit report provided to DEPWS via Onshoregas.DEPWS@nt.gov.au, no later than 4 weeks after the completion of the audits. The following must be adhered to:</p> <p>(v) Audits must focus on implementation of the EMP.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>	<p>The requirements for this Ministerial Condition (audits) occurred prior to the reporting period 17 October 2023 – 16 October 2024 of this AEPR.</p>

No	Ministerial Condition	Compliant	Evidence
18.	<p>Condition 4: Audits of compliance must be undertaken by a suitably accredited, qualified and independent person and the audit report provided to DEPWS via Onshoregas.DEPWS@nt.gov.au, no later than 4 weeks after the completion of the audits. The following must be adhered to:</p> <p>(vi) Audit reports must be prepared in accordance with any published guidance issued by DEPWS and at a minimum must:</p> <ul style="list-style-type: none"> • include audit objectives, scope and audit methods used; • include the audit criteria used for determining compliance with the commitments in the EMP; • provide detail of the evidence used for determining compliance with the commitments in the EMP (noting for clarity, actual evidence does not need to be provided); • include photographic evidence from the field-based components of the audit; • include clear identification of opportunities for improvement, compliances and non-compliances, as determined by the audit; and • include recommended corrective actions for any identified non-compliances. 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<p>The requirements for this Ministerial Condition (audits) are outside the reporting period 17 October 2023 – 16 October 2024 of this AEPR.</p>

No	Ministerial Condition	Compliant	Evidence
19.	<p>Condition 5: In support of clause B.4.17.2 of the Code of Practice: Onshore Petroleum Activities in the Northern Territory, the interest holder must:</p> <p>(i) Undertake quarterly groundwater monitoring at each control and impact monitoring bore for a minimum of three years after establishment, unless otherwise advised by DEPWS;</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Quarterly groundwater monitoring was undertaken at the following bores:</p> <p>Carpentaria 2/3/5 well pad</p> <ul style="list-style-type: none"> • RN042461 (Gum Ridge IMB) • RN042462 (Anthony Lagoon IMB) • RN042464 (Gum Ridge CMB) • RN042463 (Anthony Lagoon CMB) <p>Carpentaria 4 well pad</p> <ul style="list-style-type: none"> • RN043012 (Gum Ridge CMB)
20.	<p>Condition 5: In support of clause B.4.17.2 of the Code of Practice: Onshore Petroleum Activities in the Northern Territory, the interest holder must:</p> <p>(ii) provide to DEPWS, via Onshoregas.depws@nt.gov.au, the results of quarterly groundwater monitoring, within one month of collection, in a format to be determined by DEPWS;</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Quarterly groundwater results were submitted to Onshoregas.DEPWS@nt.gov.au on:</p> <ul style="list-style-type: none"> • 10 November 2023 • 8 February 2024 • 24 May 2024 • 6 June 2024 • 16 August 2024

No	Ministerial Condition	Compliant	Evidence
21.	<p>Condition 5: In support of clause B.4.17.2 of the Code of Practice: Onshore Petroleum Activities in the Northern Territory, the interest holder must:</p> <p>(iii) provide to DEPWS, via Onshoregas.depws@nt.gov.au, 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 of Practice: Onshore Petroleum Activities in the Northern Territory. The interpretative report must be provided annually within 3 months of the anniversary of the approval date of the EMP and include:</p> <ul style="list-style-type: none"> demonstration that there is no change to groundwater quality or level attributable to conduct of the regulated activity at the well site(s); interpretation of any statistical outliers observed from baseline measured values for each of the analytes; discussion of any trends observed; and a summary of the results including descriptive statistics. 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>The Annual Groundwater Interpretative Report was submitted to Onshoregas.DEPWS@nt.gov.au on 16 January 2024 (within 3 months of the anniversary of the approval date of IMP 4-3) which covered the reporting period from 17 October 2022 to 16 October 2023.</p> <p>The report was revised following DEPWS feedback and resubmitted on 6 June 2024.</p>

No	Ministerial Condition	Compliant	Evidence
22.	<p>Condition 5: In support of clause B.4.17.2 of the Code of Practice: Onshore Petroleum Activities in the Northern Territory, the interest holder must:</p> <p>(iv) develop site-specific performance standards for groundwater quality and interquartile ranges for analytes at each of the impact monitoring bores established, based on the first 3 years of groundwater monitoring, and provide to DEPWS, via Onshoregas.depws@nt.gov.au within 6 months of the 3 year anniversary of approval of the EMP.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	The requirements for this Ministerial condition are outside the reporting period 17 October 2023 – 16 October 2024 of this AEPR.
23.	<p>Condition 6: The ground-truthing committed to in the EMP must be undertaken one week in advance of commencement of ground-disturbing activities by a qualified and experienced ecologist with experience in Gouldian finch habitat requirements to ensure alternative routes are identified in the field prior to commencement of clearing.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	New clearing did not occur during the reporting period 17 October 2023 – 16 October 2024 of this AEPR.

No	Ministerial Condition	Compliant	Evidence
24.	<p>Condition 7: Prior to the commencement of ground-disturbing activities, the interest holder must engage an ecologist with experience in Gouldian Finch habitat requirements to prepare a map of potential Gouldian Finch breeding habitat that could be impacted by the regulated activity. The potential Gouldian Finch breeding habitat mapping must:</p> <p><i>i.</i> be provided to DEPWS via Onshoregas.dewps@nt.gov.au in advance of commencement of ground-disturbing activities; and</p> <p><i>ii.</i> quantify the proportion of the regulated activity footprint that consists of potential Gouldian Finch breeding habitat.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	The requirements for this Ministerial condition were provided prior to the reporting period 17 October 2023 – 16 October 2024 of this AEPR.
25.	<p>Condition 8: Clearing of vegetation within mapped potential Gouldian Finch breeding habitat for access tracks, wastewater flowlines, gravel pits and well pads must avoid removal of trees with hollows with a diameter of >25 cm at breast height, to the maximum extent practicable.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	New clearing did not occur during the reporting period 17 October 2023 – 16 October 2024 of this AEPR.

No	Ministerial Condition	Compliant	Evidence
26.	<p>Condition 9: In support of schedule 1, item 11 of the Petroleum (Environment) Regulations 2016 (NT) and clause A.3.5 of the Code of Practice: Onshore Petroleum Activities in the Northern Territory, the interest holder must provide geospatial files to DEPWS, via Onshoregas.DEPWS@nt.gov.au, within 2 months of completion of each ground- disturbing or land clearing activity, as specified in Figure 3.2 of the EMP (Project schedule), which must:</p> <ul style="list-style-type: none"> i. include information on how the data was obtained; ii. meet the requirements specified by DEPWS at https://nt.gov.au/property/land-clearing/freehold-land/apply-to-clear-freehold-land/spatial-data-for-clearing-applications; iii. include riparian zones, areas of high value vegetation (which includes potential Gouldian Finch breeding habitat), areas of high density of hollow-bearing trees and the buffers applied as a result of ground-truthing activities, as polygons and with metadata indicating the area in hectares; iv. include any resultant deviations to the location of the regulated activity; v. include the location of any listed species sighted during ground-truthing; and vi. include the proposed and actual areas of vegetation cleared, as polygons and with metadata indicating the area in hectares. 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No new ground-disturbing or land clearing activities occurred during the reporting period 17 October 2023 – 16 October 2024 of this AEPR.

No	Ministerial Condition	Compliant	Evidence
27.	<p>Condition 10: To support clause C.7.2 of the Code of Practice: Onshore Petroleum Activities in the Northern Territory, all accidental releases of liquid contaminant or hazardous chemical must be immediately recorded in a site spill register, including all spills or leaks from the wastewater flowlines, regardless of volume. The spill register and geospatial files specifying the location of the spill must be submitted to DEPWS via Onshoregas.DEPWS@nt.gov.au three months after the 12 month anniversary of the approval of the EMP each year while the EMP is in force. The register must include:</p> <ul style="list-style-type: none"> i. the location, source and volume of the spill or leak; ii. volume of impacted soil removed for appropriate disposal and the depth of any associated excavation; iii. the corrective actions taken or proposed to be taken to prevent reoccurrence of an incident of a similar nature; and iv. GPS coordinates the location of the spill. 	<p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A </p>	<p>Spill register and geospatial files were submitted to Onshoregas.DEPWS@nt.gov.au on 11 January 2024. The spill register covered the period of 17 October 2022 to 16 October 2023.</p> <p>The register included:</p> <ul style="list-style-type: none"> • Location, source and volumes of spills • Volume of impacted soil removed for appropriate disposal and the depth of any excavation. • The corrective actions taken or proposed to be taken to prevent reoccurrence of an incident of a similar nature; and • GPS co-ordinates of the location of the spill

No	Ministerial Condition	Compliant	Evidence
28.	<p>Condition 11: In support of clause 16 of the <i>Water Act 1992</i> (NT) and clause B.4.2 of the <i>Code of Practice: Onshore Petroleum Activities in the Northern Territory</i>, the interest holder must undertake groundwater level/pressure monitoring at each impact monitoring bore established, using a logger to record water level for 2 weeks prior to, during, and 4 weeks after completion of hydraulic fracturing operations at each new well pad established under the EMP. 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 each impact monitoring bore.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No hydraulic fracturing operations were conducted during the reporting period 17 October 2023 – 16 October 2024 of this AEPR.
29.	<p>Condition 12: The interest holder must undertake monthly surface water monitoring in accordance with section C.8 of the <i>Code of Practice: Onshore Petroleum Activities in the Northern Territory</i> upstream and downstream of streams which are crossed by wastewater flowlines, while those flowlines contain wastewater during the wet season. The interest holder must prepare and implement a Surface Water Sampling and Analysis Plan, 2 months in advance of commencement of any wet season during which it is proposed to use wastewater flowlines that cross streams, and include:</p> <ul style="list-style-type: none"> i. the location and number of proposed monitoring points; ii. the method for sample collection; and iii. quality control and chain of custody procedures. 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No wastewater flowlines were constructed during the reporting period 17 October 2023 – 16 October 2024 of this AEPR.

<p>30. Condition 13: All freshwater used to flush the wastewater flowlines must be treated as contaminated wastewater until such time it is demonstrated that the water used to flush the flowlines has a quality consistent with uncontaminated groundwater:</p> <p>i. This is to be demonstrated by:</p> <ul style="list-style-type: none"> • undertaking analysis of the flushing water against the wastewater analytes in clause C.8 of the <i>Code of Practice: Onshore Petroleum Activities in the Northern Territory</i>; and • simultaneous measurement of electrical conductivity using calibrated field instrumentation, which must be calibrated prior to use each time; and • statistical analysis of data to demonstrate a significant correlation between the presence of contaminants and electrical conductivity. <p>ii. If part i above provides a clear demonstration that electrical conductivity can be used as a surrogate for contaminants, the interest holder may thereafter use field-based measurement of electrical conductivity, using instrumentation that must be calibrated prior to use each time, to demonstrate the flushing water is free from contaminants.</p> <p>iii. All records of measurement of the flushing water must be maintained in an auditable form.</p> <p>iv. Whenever a flowline that has been left for a period of more than 3 months with groundwater in it (post flushing) must be assumed to be contaminated and treated as wastewater.</p> <p>v. No flushing water may be released to ground.</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> N/A</p>	<p>No wastewater flowlines were constructed or flushed during the reporting period 17 October 2023 – 16 October 2024 of this AEPR.</p>
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No	Ministerial Condition	Compliant	Evidence
31.	<p>Condition 14: The interest holder must prepare and implement a Rapid Response Site Demobilisation and Stabilisation Plan that details the strategy for environmental risks, including management of drill cuttings and wastewater that may result in the event a flood inundates access and/or a well pad, within 2 months of approval of the EMP. The Plan should:</p> <ul style="list-style-type: none"> i. include response strategies, including options for removal of drill cuttings and removal, covering and/or transfer of wastewater in open treatment tanks; ii. identify personnel who would implement; iii. identify equipment required, including pumping capacity and number of pumps for the transfer of wastewater from open to enclosed tanks; iv. identify access constraints that would affect the response and how this would be managed; v. specify the timeframes for responses and demonstrate they are as low as reasonably practicable; and vi. include a commitment to commence site preparation and wet season planning by 31 July each year following EMP approval. 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>The Rapid Response Site Demobilisation and Stabilisation Plan for the 24/25 wet season was updated, with planning commencing on 30 July 2024 and the plan being finalised on 1 October 2024.</p> <p>The Plan includes:</p> <ul style="list-style-type: none"> • Response strategies; • Personnel; • Equipment (including pumping capacity); • Access constraints; • and Timeframes for responses

No	Ministerial Condition	Compliant	Evidence
32.	<p>Condition 15:</p> <p>Prior to the commencement of drilling, the interest holder must provide to DEPWS, via Onshoregas.DEPWS@nt.gov.au, bowtie-diagrams that demonstrate how potential loss of containment of wastewater will be managed, inclusive of preventative and mitigative controls, that:</p> <ul style="list-style-type: none"> i. consider loss of containment from wastewater treatment and storage tanks, drill cutting pits and wastewater flowlines; ii. consider wet and dry season conditions; and iii. consider the location of a loss of containment event. 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<p>The requirement for this Ministerial Condition (bow-tie diagram submission prior to the commencement of drilling under IMP 4-3) occurred prior to the reporting period 17 October 2023 – 16 October 2024 of this AEPR.</p>
33.	<p>Condition 16:</p> <p>The interest holder must provide to DEPWS, via Onshoregas.DEPWS@nt.gov.au, a cementing report for the surface casing through the Gum Ridge Formation and the Bukalara Formation, as soon as practicable but not more than 14 days after completion of the cementing job for each well.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<p>No well cementing jobs were completed during the reporting period 17 October 2023 – 16 October 2024 of this AEPR.</p>

No	Ministerial Condition	Compliant	Evidence
34.	<p>Condition 17: In support of clause C.4.1.2 of the Code of Practice: Onshore Petroleum Activities in the Northern Territory, the interest holder must provide to DEPWS, via Onshoregas.DEPWS@nt.gov.au, no later than 3 months of completion of the drilling program on one well pad north and one well pad south of the Carpentaria Highway, a report that:</p> <p>i. provides the outcome of assessment and leachability testing of residual drill fluids and drill cuttings; and ii. provides the recommended disposal option.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	The requirement of this Ministerial Condition (report for one well pad north and one well pad south of the Carpentaria Highway under IMP 4-3) occurred prior to the reporting period 17 October 2023 – 16 October 2024 of this AEPR.
35.	<p>Condition 18: The interest holder must ensure at all times there is sufficient capacity to enclose the complete volume of flowback fluid and produced water on the well pad in above- ground infrastructure that meets the requirements of clauses A.3.8 and C.4.2.2(b) of the Code of Practice: Onshore Petroleum Activities in the Northern Territory.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Engineering Certificates and site photos demonstrate above- ground infrastructure meets the requirements of clauses A.3.8 and C.4.2.2(b) of the Code of Practice: Onshore Petroleum Activities in the Northern Territory.
36.	<p>Condition 19: Prior to the commencement of hydraulic fracturing at any new exploration well, the interest holder must provide an updated Stakeholder Engagement Log (Appendix 11) which demonstrates engagement that was postponed as a result of COVID-19 travel restrictions has been completed. Any required amendments to the EMP resulting from assessment of an objection or claim from a stakeholder must be submitted to DEPWS via Onshoregas.DEPWS@nt.gov.au in accordance with regulation 22 or 23 of the Petroleum (Environment) Regulations 2016 (NT), as applicable.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	The requirement of this Ministerial Condition (report for one well pad north and one well pad south of the Carpentaria Highway under IMP 4-3) occurred prior to the reporting period 17 October 2023 – 16 October 2024 of this AEPR.

No	Ministerial Condition	Compliant	Evidence
37.	<p>Condition 20: The interest holder must provide to DEPWS within 6 weeks of completion of well flowback operations at each new exploration well established under the EMP a report on a comprehensive risk assessment of flowback wastewater from the hydraulic fracturing phase, via Onshoregas.DEPWS@nt.gov.au. The risk assessment must be:</p> <ul style="list-style-type: none"> i. prepared by a suitably qualified person; and ii. prepared in accordance with the monitoring wastewater analytes specified in section c.8 of the Code of Practice: Onshore Petroleum Activities in the NT. iii. Assess degradation of hydraulic fracturing chemicals in the wastewater; and iv. consider the impacts and risks on fauna and potential for soil and water contamination from loss of containment, based on the analytical results obtained. 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>Flowback Wastewater Assessment was submitted to Onshoregas.DEPWS@nt.gov.au on 13 December 2023.</p> <p>The risk assessment:</p> <ul style="list-style-type: none"> • Was prepared by a suitably qualified person; and • Monitored wastewater chemistry analytes specified in Section C.8 of the Code of Practice; and • Assessed HF chemicals in the wastewater; and • Considered impacts and risks on fauna and a terrestrial risk assessment.

No	Ministerial Condition	Compliant	Evidence
38.	<p>Compliance with Ministerial Direction Letter issued 25/11/2022</p> <p>1. Imperial Oil and Gas Pty Ltd (Imperial) is directed to comply with Clause B.4.17.2(c) of the Code and the Preliminary Guideline: Groundwater Monitoring Bores for Exploration Petroleum Wells in the Beetaloo Sub-Basin (the Guideline), which require a control monitoring bore and an impact monitoring bore to be established for each aquifer present at a well pad. For the avoidance of doubt, Imperial is directed to:</p> <p>a) ensure a control monitoring bore and an impact monitoring bore are installed on each well pad established under the EMP, for each aquifer present at each well pad in accordance with the Guideline;</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>The following impact and control monitoring bores are on each well pad:</p> <p>Carpentaria 2/3/5 well pad</p> <ul style="list-style-type: none"> • RN042461 (Gum Ridge IMB) • RN042462 (Anthony Lagoon IMB) • RN042464 (Gum Ridge CMB) • RN042463 (Anthony Lagoon CMB) <p>Carpentaria 4 well pad</p> <ul style="list-style-type: none"> • RN043012 (Gum Ridge CMB)
39.	<p>Compliance with Ministerial Direction Letter issued 25/11/2022</p> <p>1 b) ensure each monitoring bore established is screened at the top, middle and bottom of each aquifer encountered in accordance with the Guideline;</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<p>No new control or impact monitoring bores were completed during the reporting period 17 October 2023 – 16 October 2024 of this AEPR.</p>
40.	<p>Compliance with Ministerial Direction Letter issued 25/11/2022</p> <p>1 c) ensure a control monitoring bore for the Bukalara Sandstone aquifer is installed on the Carpentaria-1 well pad 6 months prior to further drilling on the Carpentaria-1 well pad; and</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<p>No further drilling has occurred on the Carpentaria 1 well pad during the reporting period 17 October 2023 – 16 October 2024 of this AEPR.</p>

No	Ministerial Condition	Compliant	Evidence
41.	<p>Compliance with Ministerial Direction Letter issued 25/11/2022</p> <p>1 d) notify the Department of Environment, Parks, and Water Security (DEPWS) via onshoregas.DEPWS@nt.gov.au within one month of installation of each new control or impact monitoring bore, providing detail on:</p> <ul style="list-style-type: none"> i. the date establishment of the monitoring bore was completed; ii. the aquifer the monitoring bore is targeting; iii. its Registered Number; and iv. its proposed use (impact monitoring, control monitoring and/or water production for use). 	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> N/A</p>	<p>No new control or impact monitoring bores were completed during the reporting period 17 October 2023 – 16 October 2024 of this AEPR.</p>
42.	<p>Compliance with Ministerial Direction Letter issued 25/11/2022</p> <p>2 Imperial is directed to comply with Clause B.4.17.2(b)(i) of the Code, which requires a minimum of six months of local baseline water quality data to be collected prior to drilling of petroleum wells intended to be hydraulic fractured. For the avoidance of doubt, Imperial is directed to:</p> <p>a) ensure monthly baseline groundwater sampling is carried out for every control monitoring bore required to be installed under (1) above, over a minimum period of 6 months prior to drilling, or 6 months prior to hydraulic fracturing if there are demonstrable circumstances that are outside of Imperial's control;</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> N/A</p>	<p>No new control or impact monitoring bores were completed during the reporting period 17 October 2023 – 16 October 2024 of this AEPR.</p> <p>Required baseline data was collected prior to the reporting period 17 October 2023 – 16 October 2024 of this AEPR.</p>

No	Ministerial Condition	Compliant	Evidence
43.	<p>Compliance with Ministerial Direction Letter issued 25/11/2022</p> <p>2 b) where Imperial believes there are circumstances that are outside of Imperial's control which prevent undertaking 6 months of groundwater baseline monitoring prior to drilling, maintain records of the circumstances;</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Required baseline data was collected prior to the reporting period 17 October 2023 – 16 October 2024 of this AEPR.
44.	<p>Compliance with Ministerial Direction Letter issued 25/11/2022</p> <p>2 c) provide the results of the monthly baseline groundwater sampling, which must be compliant with Table 6 of the Code, to DEPWS as soon as practicable and in any case within two months of sampling via Onshoregas.DEPWS@nt.gov.au, in a format to be advised by DEPWS;</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Required baseline data was collected and submitted prior to the reporting period 17 October 2023 – 16 October 2024 of this AEPR.
45.	<p>Compliance with Ministerial Direction Letter issued 25/11/2022</p> <p>2 d) ensure the sampling results are included in the interpretative report required to be provided under Condition 5 of the Approval Notice and Statement of Reasons issued for IMP4-3 on 17 October 2021; and</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	An interpretative report of groundwater quality based on the groundwater monitoring required under Ministerial Condition 5 was submitted to DEPWS on 16 January 2024.

No	Ministerial Condition	Compliant	Evidence
46.	<p>Compliance with Ministerial Direction Letter issued 25/11/2022</p> <p>2 e) continue groundwater monitoring of all control monitoring and impact monitoring bores installed on well pads established under the EMP quarterly for a total of three years, including any groundwater monitoring already conducted for each aquifer encountered at a well pad.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Groundwater monitoring of all control monitoring and impact monitoring bores has continued in this reporting period. This reporting period marked the three-year anniversary of the following bores;</p> <ul style="list-style-type: none"> • RN042461 (Gum Ridge IMB) • RN042462 (Anthony Lagoon IMB) • RN042464 (Gum Ridge CMB) • RN042463 (Anthony Lagoon CMB)
47.	<p>Compliance with Ministerial Direction Letter issued 25/11/2022</p> <p>3) Clauses C.4.2.2(a) and C. 7.1.1 (a)(ii) of the Code operate together to require all produced water and flowback fluid (wastewater) to be held in above-ground enclosed tanks at all times unless it is being treated, reused, disposed of, or removed from site. If treatment occurs outside of enclosed tanks, the EMP must include a plan to transfer wastewater back into enclosed tanks or to enclose open treatment tanks at least eight hours before a predicted significant rainfall event. For the avoidance of doubt, Imperial is directed to:</p> <p>a) ensure there is capacity to accommodate all flowback fluid and produced water (wastewater) in above-ground enclosed tanks available on each tank pad established under the EMP;</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>All wastewater under IMP4-3 was held in either above-ground enclosed tanks or open-topped tanks with the availability of removeable tank covers during the reporting period of 17 October 2023 to 16 October 2024.</p>

No	Ministerial Condition	Compliant	Evidence
48.	<p>Compliance with Ministerial Direction Letter issued 25/11/2022</p> <p>3 b) ensure that all wastewater is enclosed at least eight hours before a predicted significant rainfall event (as defined in the approved EMP);</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No predicted significant rainfall event occurred for sites under IMP 4-3 during the reporting period of 17 October 2023 to 16 October 2024.
49.	<p>Compliance with Ministerial Direction Letter issued 25/11/2022</p> <p>3 c) include with the notification already required to be provided under Condition 1 (i) of the Approval Notice and Statement of Reasons issued for IMP4-3 on 17 October 2021, demonstration that the available enclosed tank capacity is sufficient to store the full wastewater volume expected to be returned to surface after hydraulic fracturing;</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No hydraulic fracturing occurred during the reporting period of 17 October 2023 to 16 October 2024.
50.	<p>Compliance with Ministerial Direction Letter issued 25/11/2022</p> <p>3 d) if the proposed method for enclosing wastewater is through the use of a removeable tank cover, provide details via onshoregas.depws@nt.gov.au of the proposed method for ensuring rainwater collected on the tank cover is able to be removed continuously during the wet season such that the integrity of the tank cover is not at risk.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Rapid Response Site Demobilisation and Stabilisation Plan – 2023/24 Wet Season Preparedness, emailed to onshoregas.depws@nt.gov.au on 15 February 2024. Section 1.3 of the Plan includes reference to the use of removeable tank cover and details (testing for pH and EC etc) of use

No	Ministerial Condition	Compliant	Evidence
51.	<p>Compliance with Ministerial Direction Letter issued 25/11/2022</p> <p>4 Imperial is directed to comply with Clauses C.5.4 and C.5.5 of the Code, which set monitoring requirements for both flowback fluid and combined flowback fluid and produced water (wastewater) storage. For the avoidance of doubt, Imperial is directed to:</p> <p>a) undertake continuous monitoring (at least once per 24 hours) of electrical conductivity, pH and temperature of flowback fluid prior to transferring flowback fluid into storage tanks, in accordance with clause C.5.4(b)(i) of the Code for the period flowback is occurring at any well;</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<p>In accordance with Clause C.5.4 Imperial did not hydraulically fracture and thus did not generate flowback during the reporting period of 17 October to 16 October 2024. The cumulative flowback fluid volume was monitored for 3 months, 6 months and 12 months after flowback commenced for each well. This is evidenced by weekly reports provided under Ministerial condition 1.</p> <p>In compliance with Clause C.5.5, Imperial recorded the quality and quantity of wastewater in accordance with IMP4-3 EMP commitments and the stored volume and available freeboard was monitored at least weekly during the dry season. This is evidenced by weekly reports provided under Ministerial condition 1.</p>
52.	<p>Compliance with Ministerial Direction Letter issued 25/11/2022</p> <p>4 b) undertake at least weekly monitoring of flowback fluid quality prior to going into the storage tanks, in accordance with clauses C.5.4(b)(ii) and C.8 of the Code;</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<p>No flowback fluid was generated during the reporting period of 17 October 2023 to 16 October 2024, as such weekly monitoring was not required.</p>
53.	<p>Compliance with Ministerial Direction Letter issued 25/11/2022</p> <p>4 c) develop criteria based on the analytes listed in clause C.8 of the Code for determining that flowback fluid quality has stabilized sufficient to cease weekly monitoring in accordance with clause C.5.4(b)(ii) of the Code, for provision to DEPWS via onshoregas.depws@nt.gov.au for review and acceptance by DEPWS;</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<p>No flowback fluid was generated during the reporting period of 17 October 2023 to 16 October 2024, as such weekly monitoring was not required.</p>

No	Ministerial Condition	Compliant	Evidence
54.	<p>Compliance with Ministerial Direction Letter issued 25/11/2022</p> <p>4 d) continue weekly monitoring until Imperial can demonstrate the flowback fluid quality is consistent with the criteria developed under item c) and has stabilized sufficient to cease monitoring; and</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<p>No flowback fluid was generated during the reporting period of 17 October 2023 to 16 October 2024, as such weekly monitoring was not required.</p>
55.	<p>Compliance with Ministerial Direction Letter issued 25/11/2022</p> <p>4 e) undertake at least 6 monthly sampling and analysis in accordance with clauses C.5.5(c) and C.8 of the Code of the combined produced water and flowback fluid (wastewater) storage until there is no wastewater in storage.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>6 monthly sampling and lab analysis of flowback fluid was undertaken during the reporting period.</p> <p>Sampling took place on:</p> <ul style="list-style-type: none"> • 9 January 2024 • 11 June 2024

Table 3 provides a systematic overview of interest holder performance against the environmental outcomes and environmental performance standards within the approved EMP. Table 3 has been populated to provide examples of information to be included.

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 any:	No complaints from the community around excessive dust	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Community complaints register shows no complaints received concerning dust generation during the AEPR reporting period of 17 October 2023 to 16 October 2024. Site induction records show induction materials include consideration of impact on air quality from dust generation.
2.	<ul style="list-style-type: none"> safety risks for the public or landholders, activities do not impede on the activities of stakeholders, activities have no negative impacts on the community and cultural heritage 	Speed limits adhered to	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Site induction records include requirements related to adhering to speed limits. Incident management system shows no records of non-adherence to speed limits during the AEPR reporting period of 17 October 2023 – 16 October 2024.
3.		Minimal incidences of dust created from unsealed roads. (minimal being under 4 incidents reported within a 2 week period)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Daily records show the use of water carts linked to access track condition assessment and site activities. The incident management system has no records of excessive dust creation.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
4.		Speed limits posted on unsealed access tracks adhered to	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Site induction records include requirements related to adhering to speed limits. Incident management system shows no records of non-adherence to speed limits during the reporting period of 17 October 2023- 16 October 2024.
5.		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	<ul style="list-style-type: none"> Incident management system shows no record of dangerous driving or non adherence to road rules during the reporting period of 17 October 2023- 16 October 2024. Community complaints register shows no complaints received concerning dangerous driving during the reporting period of 17 October 2023- 16 October 2024.
6.		No damage to or loss of public infrastructure, private infrastructure and equipment or community lands	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Incident management system shows no record of damage to or loss of public infrastructure, private infrastructure and equipment or community lands occurred under IMP 4-3 during the reporting period of 17 October 2023 to 16 of October 2024. Induction records for employees and contractors cover pastoral, conservation, legislation and infrastructure issues.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
7.		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	<ul style="list-style-type: none"> Photo records confirm the name of the Interest Holder, well name, well number and PPE requirements are displayed in writing on all IMP 4-3 well sites in accordance with the Code of Practice.
8.		No impact on cultural heritage sites.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Imperial has attained Aboriginal Area Protection Authority certificates prior to clearing. Contracts for the employment of Cultural Clearance Monitors and Traditional Owners. Incident management system shows no cultural heritage related incidents during the reporting period of 17 October 2023 to 16 October 2024.
9.		No instances of overtopping of pits, Flowback Water and Produced Water tanks due to significant weather events	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Incident management system shows no instances of overtopping of pits, Flowback Water and Produced Water tanks occurred under IMP 4-3 during the reporting period of 17 October 2023 to 16 of October 2024. Records show that the daily wet season weather forecast checks occur.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
10.		No impact on the stakeholder to their use of the land.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Installed updated signs and fences under IMP 4-3 during the reporting period of 17 October 2023 – 16 October 2024 IMP 4-3 Annual Rehabilitation report submitted to DLPE on 8 October 2024 demonstrates rehabilitation of disturbed areas has commenced. Community complaints register shows no complaints received in regards to the use of the land during the reporting period of 17 October 2023 – 16 October 2024.
11.		To deliver benefits to the local community	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Local contractors were employed to deliver services/goods under IMP 4-3 during the reporting period of 17 October 2023- 16 October 2024
12.		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	<ul style="list-style-type: none"> Community complaints register shows no complaints regarding noise, vibration or spill during the reporting period of 17 October 2023 to 16 of October 2024.
13.		No livestock on site	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Weekly records show the well site fence installed and intact throughout the regulated activity. Incident management system records no instances of livestock on site during the reporting period of 17 October 2023 to 16 of October 2024.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
14.	Ensure that sensitive receptors, significant conservation areas, or listed species or their habitat are not permanently affected by the conduct of the regulated activity	No vegetation cleared beyond the approved areas	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Site induction records show materials include requirements relating to clearing limits. Incident management system records no instance of vegetation cleared beyond the approved areas under IMP 4-3 during the reporting period of 17 October 2023 to 16 of October 2024.
15.		No introduction of new weed species or spread of existing weed populations as a result of conduct of the regulated activity	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Site induction materials include requirements related to weed impacts and the prevention of spread. Spray records demonstrate weed control activities undertaken as specified in the approved Weed Management Plan (IMP 4-3 Appendix IMP 4-3 Imperial Post Wet Season Weed Report was submitted to DLPE Weed Officer on 11 July 2024 and notes that weeds were not believed to have been introduced by regulated activity.
16.		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	<ul style="list-style-type: none"> Records of monitoring weather and fire danger during the reporting period of 17 October 2023 to 16 October 2024. Incident management system records no fires in surrounding areas resulting from conduct of the regulated activity occurred under IMP 4-3 during the reporting period of 17 October 2023 to 16 of October 2024.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
17.		No vermin attracted to site due to improper storage of general wastes	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Site induction records include material on waste disposal requirements. Incident management system records no incidences relating to vermin and waste.
18.		No instances of overtopping of pits, Flowback Water tanks, and Produced Water tanks due to significant weather events	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Incident management system shows no instances of overtopping of pits, Flowback Water and Produced Water tanks occurred under IMP 4-3 during the reporting period of 17 October 2023 to 16 of October 2024. Records show that the daily wet season weather forecast checks occur.
19.		Waste transported appropriately	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<ul style="list-style-type: none"> No wastewater transported under IMP 4-3 for disposal offsite during the reporting period of 17 October 2023 to 16 of October 2024.
20.		No leaks from flowlines	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<ul style="list-style-type: none"> No wastewater flowlines constructed or operational under IMP 4-3 during the reporting period of 17 October 2023 - 16 October 2024.
21.		All waste segregated on-site according to whether it is hazardous, recyclable or for general disposal	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Operational checks confirm waste appropriately segregated.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
22.		Maintain the freeboard in open-topped wastewater treatment tanks over the wet season	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Incident management system shows no instances of overtopping events occurred during the wet season as a result of excessive rain.
23.		Wastewater from drilling stored in lined pits	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Documentation and site photographs available demonstrating the lining in pits meet requirements as provided in IMP 4-3 Appendix 06 Section 13 (Aquacon 345).
24.		Disturbance to biodiversity from increased noise, vibration and light is minimised to the greatest extent possible	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Site induction records include requirements related to minimizing noise and light spill. Maintenance records for vehicles demonstrate vehicles serviced.
25.	Terrestrial environmental quality, including surface waters, are not permanently affected by the regulated activity's conduct.	No ground disturbance occurs outside of designated areas approved for ground disturbance	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<ul style="list-style-type: none"> New clearing did not occur during the reporting period 17 October 2023 - 16 October 2024 of this AEPR.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
26.		Actively preventing erosion and sedimentation	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> • Operational checks show ESC maintenance implemented. • Erosion and sedimental control civil work occurred under IMP 4-3 during the reporting period of 17 of October 2023 to 16 of October 2024, as outlined in the following weekly civil reports; <ul style="list-style-type: none"> ○ 231015 IMP 4-3 Weekly Civils Report submitted to DEPWS on 15/1/24 ○ 240516 IMP 4-3 Weekly Civils Report submitted to DEPWS on 16/5/24 <p>The reports outline the following actions:</p> <ul style="list-style-type: none"> ○ Carpentaria 2/3 access Track was upgraded ○ Minor erosion repairs to Carpentaria 4 wellpad ○ Minor erosion repairs to Carpentaria 2/3 well pad

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
27.		Not allowing areas to continuously erode or create ongoing sedimentation deposits	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> • Operational checks show ESC maintenance implemented. • Erosion and sedimental control civil work occurred under IMP 4-3 during the reporting period of 17 of October 2023 to 16 of October 2024, as outlined in the following weekly civil reports; <ul style="list-style-type: none"> ○ 231015 IMP 4-3 Weekly Civils Report submitted to DEPWS on 15/1/24 ○ 240516 IMP 4-3 Weekly Civils Report submitted to DEPWS on 16/5/24 <p>The reports outline the following actions:</p> <ul style="list-style-type: none"> ○ Carpentaria 2/3 access Track was upgraded ○ Minor erosion repairs to Carpentaria 4 wellpad ○ Minor erosion repairs to Carpentaria 2/3 well pad
28.		No vehicle movements outside of designated areas approved for ground disturbance during construction and seismic acquisition or off access tracks for all other activities	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> • Site induction records include the prohibition of movement outside approved areas. • The incident management system has no records related to unauthorised movement off site during the reporting period of October 2023 – October 2024.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
29.		Vehicles on access tracks are only allowed to cross intersecting flowing creeks or watercourses with specific authorisations to do so.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Site induction records include the prohibition of crossing flowing creeks unless approved by the Site Manager. The incident management system has no records related to the unauthorised crossing of flowing creeks or watercourses during the reporting period of October 2023 – October 2024.
30.		All hazardous chemicals or those that may cause environmental harm to be stored in secondary containment, which has sufficient capacity to hold 100% of the volume of the largest container stored unless the container has its own secondary containment.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Site induction records include the requirements related to the use and storage of hazardous chemicals. Weekly inspections records confirm all hazardous materials stored in compliance with relevant SDS. Weekly inspection records confirm tanks and storage vessels intact and free from defects or tears.
31.		No instances of loss of containment of wastewater	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> The incident management system has no records of loss of containment of wastewater during the reporting period of 17 October 2023 – 16 October 2024.
32.		No instances of overtopping of pits, Flowback Water and Produced Water tanks due to significant weather events	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Incident management system shows no instances of overtopping events occurred during the reporting period of 17 October 2023 – 16 October 2024. Records show that the daily wet season weather forecast checks occur.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
33.		Freeboard for all pits, Flowback Water and Produced Water tanks maintained at all times	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> A minimum of 1100mm freeboard was not achieved for wastewater storage at all times throughout the 2023 – 2024 wet season at the Carpentaria 2/3 wellpad. This was reported to DEPWS via the weekly reports from 1 March 2024 – 5 April 2024 and the IMP 4-3 Quarterly Recordable Incident Report submitted to DEPWS on 15/04/24. <p>The freeboard design capacity contained the rainfall and no overtopping occurred. No environmental harm occurred.</p>
34.		All spills remediated immediately on discovery	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Site induction records include the requirements to remediate all spills to the ground immediately. Operational checks show chemical storage inspections and spill kit inspections. IMP 4-3 Spill register confirms spills remediated during the reporting period of 17 October 2023 – 16 October 2024 Incident management system has no instances where spills were not remediated immediately on discovery.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
35.		No water to be taken from surface water sources	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Incident management system shows no instances of water being taken from surface water sources occurred under IMP 4-3 during the reporting period of 17 October 2023 to 16 of October 2024.
36.	The conduct of the regulated activity does not result in the over-extraction or contamination of groundwater resources	Compliance with the groundwater extraction licence	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Groundwater extraction volumes were reported to DLPE Water Resources division via My Meter (WALAPS) dashboard prior to the due dates. Incident management system shows no instances of groundwater over extraction during the reporting period of 17 October 2023 to 16 of October 2024.
37.		No contamination of aquifers from the regulated activities	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Local baseline data collection for water quality indicators has been taken in accordance with IMP 4-3 Ministerial Condition 5. IMP 4-3 Annual Groundwater Report for the reporting period of 17 October 2023 – 16 October 2024 does not show contamination of the local aquifers from the regulated activity.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
38.	Local inland water quality is not permanently affected by the conduct of the regulated activity.	Vehicle crossing of flowing creeks or watercourses to only occur with specific authorisations.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Site induction records include the prohibition of crossing flowing creeks unless approved by the Site Manager Incident management system shows no records related to unauthorised crossing of flowing creeks or watercourses occurred under IMP 4-3 during the reporting period of 17 October 2023 to 16 of October 2024.
39.		No loss of riparian flora	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<ul style="list-style-type: none"> New clearing did not occur during the reporting period 17 October 2023 - 16 October 2024 of this AEPR. Incident management system shows no unauthorised clearing occurred under IMP 4-3 during the reporting period of 17 October 2023 to 16 of October 2024.
40.		All hazardous chemicals or those that may cause environmental harm to be stored in secondary containment, which has sufficient capacity to hold 100% of the volume of the largest container stored unless the container has its own secondary containment.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Site induction records include the requirements related to the use and storage of hazardous chemicals. Operational checks show chemical storage inspections. Incident management shows no records of failures of integrity of storage vessels under IMP 4-3 during the reporting period of 17 October 2023 to 16 of October 2024.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
41.		No pit or tank failure due to flooding inundation	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Civils schematics for Carpentaria 2/3/5 cuttings pit maintenance undertaken in 2024 demonstrates a minimum 500mm bund to prevent water entry from overland flow. Incident management system shows no pit or tank failure due to flooding inundation occurred during the reporting period of 17 October 2023 to 16 of October 2024.
42.		No instances of loss of containment of wastewater	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Incident management shows no instances of loss of containment of wastewater occurred under IMP 4-3 during the reporting period of 17 October 2023 to 16 of October 2024. Site induction materials include requirements related to wastewater storage. Site inspections confirm tanks marked with freeboard levels as per seasonal requirements
43.		All spills remediated immediately on discovery	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Site induction records include the requirements to remediate all spills to the ground immediately. Operational checks show chemical storage inspections and spill kit inspections. IMP 4-3 Spill register confirms spills remediated during the reporting period of 17 October 2023 - 16 October 2024

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
44.		No leaks from flowlines	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<ul style="list-style-type: none"> No wastewater flowlines constructed or operational under IMP 4-3 during the reporting period of 17 October 2023 – 16 October 2024.
45.		All storage vessels for wastewater and hazardous substances are maintained at 100% integrity	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Incident management system shows no damage to wastewater or hazardous substance storage vessels under IMP 4-3 during the reporting period of 17 October 2023 to 16 of October 2024. Inspection records confirm tanks and storage vessels are intact.
46.		No impact on inland water environmental quality	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Regulated activities under approved WOMP which was submitted to DLPE via onshoregas.depws@nt.gov.au on 2 October 2024.
47.		No water to be taken from surface water sources	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Incident management system shows no water taken from surface water sources occurred under IMP 4-3 during the reporting period of 17 October 2023 to 16 of October 2024.
48.	Minimise emissions, including greenhouse gases, created by the 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	<ul style="list-style-type: none"> Community complaints register shows no complaints received concerning excessive emissions from site. IMP 4-3 Emissions Report was submitted to onshoregas.depws@nt.gov.au on 19 September 2024. Total Scope 1 emissions were below predicted emissions levels in the EMP.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
49.		All vehicles, plant and equipment maintained and operated per manufacturer requirements to minimise emissions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> EP 187 Equipment Servicing Register maintained during the reporting period of 17 October 2023 – 16 October 2024.
50.		Flaring to be used rather than venting during production testing	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<ul style="list-style-type: none"> No flaring or venting occurred under IMP 4-3 during the reporting period of 17 October 2023 to 16 of October 2024.
51.		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	<ul style="list-style-type: none"> Leak Detection monitoring undertaken at Carpentaria 2/3 and Carpentaria 4 wellheads in accordance with the Code of Practice on the: <ul style="list-style-type: none"> 29 December 2023 7 June 2024 <p>No leaks were recorded during the monitoring events.</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),² 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	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	<ul style="list-style-type: none"> No new areas cleared under IMP 4-3 during the AEPR reporting period of 17 October 2023 to 16 October 2024.
2.	Code cl A.3.6 (b) <i>IMP 4-3 Appendix 9</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	<ul style="list-style-type: none"> IMP 4-3 Appendix 9 Weed Management Plan includes the required commitment for ongoing weed monitoring Post wet season inspection survey conducted between 29 May and 30 May 2024, report submitted to DEPWS Weed Officer on 11 July 2024
3.	Code cl A.3.7(a)vi <i>IMP 4-3 Appendix 8</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	<ul style="list-style-type: none"> IMP 4-3 Appendix 8 includes the required commitment for ongoing fire mapping. Annual fire mapping was conducted May 2024. The results of the mapping are stored in the Compliance files.

² Petroleum (Environment) Regulations 2016 (NT) sch 1, item 11(2).

No	Reference	Requirement	Compliant	Evidence
4.	Code cl A.3.9(c) Code cl A.3.9(e) <i>IMP 4-3 Appendix 12</i>	The rehabilitation plan requires progressive rehabilitation of significantly disturbed land 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"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> IMP 4-3 Annual Rehabilitation report submitted to DLPE on 8 October 2024 demonstrates rehabilitation of disturbed areas has commenced.
5.	Code cl B.4.13.2(c)	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	<ul style="list-style-type: none"> No hydraulic fracturing occurred under IMP 4-3 during the AEPR reporting period of 17 October 2023 to 16 October 2024.
6.	Code cl B.4.13.2(k)iv	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	<ul style="list-style-type: none"> No venting occurred under IMP 4-3 during the AEPR reporting period of 17 October 2023 to 16 October 2024.

No	Reference	Requirement	Compliant	Evidence
7.	Code cl B.4.14.2(c)	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	<ul style="list-style-type: none"> Updated WBIV diagrams were submitted to DITT via Alireza.Dianati@nt.gov.au on 17 October 2023.
8.	Code cl B.4.15.2(j)	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	<ul style="list-style-type: none"> No petroleum wells were decommissioned under IMP 4-3 during the AEPR reporting period of 17 of October 2023 to 16 of October 2024.
9.	Code cl C.6.1(d)	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	<ul style="list-style-type: none"> IMP 4-3 Annual Water and Wastewater Report was submitted to DEPWS via onshoregas.depws@nt.gov.au on 7 February 2024 for the period of 17 October 2022 - 16 October 2023.
10.	Code cl C.7.1(d)ii <i>IMP 4-3 Appendix 6</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	<ul style="list-style-type: none"> IMP 4-3 Appendix 6 Wastewater Management Plan includes the required clause.
11.	Code cl D.5.9.2(c) <i>EMP Section 3.17</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	<ul style="list-style-type: none"> IMP 4-3 Emissions Report was submitted to DLPE via email on 19 September 2024.

No	Reference	Requirement	Compliant	Evidence
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	<ul style="list-style-type: none"> No gas processing or other downstream facility occurs under IMP 4-3 during the AEPR reporting period of 17 of October 2023 to 16 of October 2024.
13.	Reg 33 <i>EMP Section 7.6</i>	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	<ul style="list-style-type: none"> No reportable incidents occurred under IMP 4-3 during the AEPR reporting period of 17 October 2023 to 16 October 2024
14.	Reg 34 <i>EMP Section 7.6</i>	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	<ul style="list-style-type: none"> No reportable incidents occurred under IMP 4-3 during the AEPR reporting period of 17 October 2023 to 16 October 2024
15.	Reg 35 <i>EMP Section 7.6</i>	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>All recordable incident reports were provided to DEPWS no later than 15 days after the 90-day reporting period. Reports were submitted on the below dates.</p> <ul style="list-style-type: none"> Q4 Oct to Dec 2023 - emailed 11 January 2024 Q1 Jan to Mar 2024 - emailed 15 April 2024 Q2 Apr to Jun 2024 - emailed 15 July 2024 Q3 Jul to Sep 2024 - emailed 3 October 2024
16.	Reg 37A <i>EMP Appendix 6</i>	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	<ul style="list-style-type: none"> No hydraulic fracturing occurred under IMP 4-3 during the AEPR reporting period of 17 October 2023 to 16 October 2024.

No	Reference	Requirement	Compliant	Evidence
17.	Reg 37B <i>IMP 4-3 Appendix 6</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	<ul style="list-style-type: none"> No hydraulic fracturing occurred under IMP 4-3 during the AEPR reporting period of 17 of October 2023 to 16 of October 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 before commencement of construction, ³ drilling, or seismic surveys.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<ul style="list-style-type: none"> Notifications of commencement were submitted via email on 9 September 2024 to the Minister, owner of the land and occupiers of the land.

³ Note, civil works are also considered 'construction' activities.

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	74	59.7%
Not Compliant	1	0.8%
Not Applicable	49	39.5%

3.2. Overview of non-compliant items

Refer to Section 3.11.2 of the AEPR Guideline for further guidance.

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 type="checkbox"/> Yes <input checked="" 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	
3	Summary of non-compliance	
4	Evidence used to detect non-compliance	
5	<input type="checkbox"/> Yes <input type="checkbox"/> No	Environmental harm arising from non-compliance If yes, complete section below. If no, proceed to row 7.

Overview of non-compliance		
6	If yes, describe nature and scale of impact and actions to remediate and rehabilitate	
7	If no, describe how determined no impact	
8	<input type="checkbox"/> Yes	Administrative non-compliance
9	If yes, describe nature of non-compliance	
10	Immediate corrective actions implemented	
11	Future corrective actions to prevent reoccurrence	
2. Environmental outcomes		
12	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Non-compliance with environmental outcome? If yes, complete the sections below. If more than one instance, copy the rows below for each outcome not complied with. If no, proceed to 3. Environmental Performance Standards
13	Outcome	
14	Summary of non-compliance	
15	Evidence used to detect non-compliance	
16	<input type="checkbox"/> Yes <input type="checkbox"/> No	Environmental harm arising from non-compliance If yes, complete section below. If no, proceed to row 18.
17	If yes, describe nature and scale of impact and actions to remediate and rehabilitate	
18	If no, describe how determined no impact	
19	<input type="checkbox"/> Yes	Administrative non-compliance
20	If yes, describe nature of non-compliance	
21	Immediate corrective actions implemented	
22	Future corrective actions to prevent reoccurrence	

Overview of non-compliance		
3. Environmental performance standards		
23	<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>
24	Environmental performance standard	Freeboard for all pits, Flowback Water and Produced Water tanks maintained at all times.
25	Summary of non-compliance	<p>A minimum of 1100mm freeboard was not achieved for wastewater storage at all times throughout the wet season under IMP 4-3. This was reported according to DEPWS via the weekly reports from 1 March 2024 – 5 April 2024 and the IMP 4-3 Quarterly Recordable Incident Report submitted to DEPWS on 15/04/24.</p> <p>The freeboard design capacity contained the rainfall and no over topping occurred.</p>
26	Evidence used to detect non-compliance	Water level sensors, remote telemetry and field inspections via helicopter.
27	<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 29.</p>
28	If yes, describe nature and scale of impact and actions to remediate and rehabilitate	
29	If no, describe how determined no impact	No environmental impact occurred. Freeboard remained available to contain additional rainfall in the cutting pit, sump and wastewater tank until the end of the wet season.
30	<input type="checkbox"/> Yes	Administrative non-compliance
31	If yes, describe nature of non-compliance	
32	Immediate corrective actions implemented	Level monitoring undertaken via cameras, remote sensors and helicopter deployment to verify remaining freeboard adequate to avoid overtopping.
33	Future corrective actions to prevent reoccurrence	<p>Installed an additional above-ground enclosed storage tank on the Carpentaria 2/3/5 wellpad to increase fluid storage capacity.</p> <p>Undertook civil upgrade works on the Carpentaria 2/3/5 access track to improve site access for vehicles during the 24/25 wet season to allow for pre-emptive fluid transfers.</p>
4. Regulatory reporting or record keeping		

Overview of non-compliance		
34	<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
35	Reporting or recording requirement	
36	Summary of non-compliance	
37	Evidence used to detect non-compliance	
38	Corrective actions implemented to improve reporting and record keeping	
5. Monitoring		
39	<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.
40	Monitoring requirement	
41	Summary of non-compliance	
42	Evidence used to detect non-compliance	
43	Corrective actions implemented to ensure compliance with monitoring requirements	

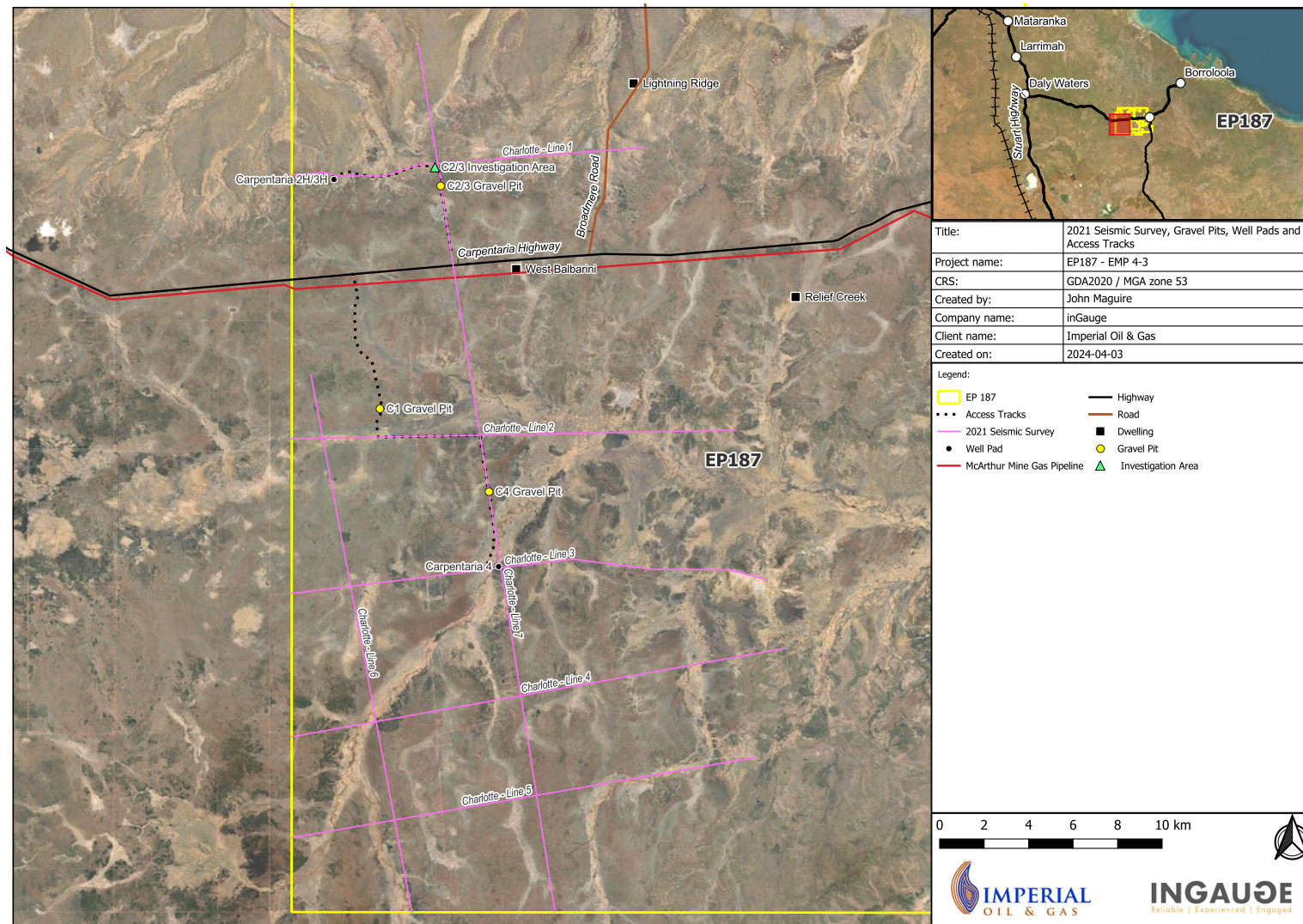


Figure 2 Location of Regulated Activity