Annual Environmental Performance Report

EMP title	Imperial O & G 2021 Carpentaria 1 Work Program EP 187
Unique EMP ID	IMP 3-4.2
EMP approval date	15/02/2021
AEPR period	15/02/2024 - 14/02/2025
Petroleum title number/s	Exploration Permit 187 (EP 187)

The information to be included in this template may be used by the Minister for Environment, Climate Change and Water Security to assess whether an interest holder is meeting the environmental outcomes, environmental performance standards and obligations and commitments made in an approved Environment Management Plan (EMP).

This form must be completed in accordance with the instruction and guidance provided in the Onshore Petroleum Annual Environmental Performance Reporting Guideline available on the <u>Onshore Gas website</u>.

Document title Annual Environmental Performance Report	
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Version Control

Date	Rev	Reason for Amendment	Author	Checked	Approved
09/5/2025	1	Date of submission to DLPE	VC, AS, SR	RL	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	Chris White
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

Annual Environmental Performance Report

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)
DLPE	Department of Lands, Planning and Environment (NT)
DITT	Department of Industry, Tourism and Trade (NT)
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 Petroleum Act 1984
Regulations	Petroleum (Environment) Regulations 2016 (NT)

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Figure 1: Project Location Map of Works Associated with IMP3-4
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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		Imperial O & G 2021 Carpentaria 1 Work Program EP187	
Unique EN	MP ID	IMP3-4.2	
EMP appro	oval date	15/02/2021	
AEPR peri	od	15/02/2024 - 14/02/2025	
Petroleum	title number/s	EP 187	
Regulation	n 22 Notices		
Date Ackr	nowledged	Scope	
22/12/2023		1. Allows transfer of flowback fluid from the Carpentaria 1 above ground tank to the Carpentaria 2 above ground tank.	
22/12/2023 2. Updated		2. Updated Emergency Response Plan for EP 187	
Regulation	Regulation 23 Notices		
Date A	Date Acknowledged Scope		
NA		NA	
Location o	Location of Regulated Activity		
\boxtimes	Figure 1 attached showing location of regulated activity		
\boxtimes	Figure 2 attached showing well pad layout		
Regulated	Regulated activities conducted during the reporting period		
1	Carp 1 Sumps closure and Rehabilitation - Fence removal, Liner removal, (Mix) Bury cover cuttings pit with stockpiled and batter material, Dry and bury cover cuttings with stockpiled and bund material Cutting and fluid transfer. 2/11/24 - 6/12/24		
2	Storage of wastewater at Carp 1 sumps, occurred until wastewater and liners were removed		
3	Carpentaria 1 Fluid Removal 20/11/2024		

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

4	Carpentaria 1 well shut in for pressure build-up, occurred throughout the reporting period.
\boxtimes	Gantt chart attached showing the period each regulated activity listed above was conducted

1.1. Sources of information to inform performance

Informatio	Information evaluated to inform compliance status (check applicable sources)			
\boxtimes	Compliance with Ministerial approval conditions			
\boxtimes	Compliance with each environmental outcome and environmental performance standard within the approved EMP			
\boxtimes	Compliance with reporting requirements in accordance with the Code and Regulations			
\boxtimes	Recordable and reportable incidents within the reporting period, including root cause analysis and related corrective actions to prevent re-occurrence			
	Findings of regulatory inspections and audits within the reporting period and related actions to address any findings			
Other				

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)			
	Interest holder self-assessments of compliance, through daily and weekly inspections, as committed to in the EMP		
	Interest holder self-assessments of compliance, through internal audits, as committed to in the EMP		

	Interest holder self-assessments of compliance, through external audits conducted by third parties	
\boxtimes	Outcomes of inspections and/or audits conducted by the regulator	
\boxtimes	Spill register entries	
\boxtimes	Monitoring or other reports provided to DEPWS, the Department of Industry, Tourism and Trade (DITT) and other government agencies as required by the EMP	
\boxtimes	Outcomes of monitoring programs	
\boxtimes	Measurement criteria identified in the approved EMP	
Other		

2. Demonstration of performance

Table 2 demonstrates interest holder compliance with Ministerial EMP approval conditions. Table 2 has been populated to provide examples of information to be included.

No	Ministerial Condition	Compliant	Evidence
1.	 Condition 1: The interest holder must submit to the Department of Environment, Parks and Water Security (DEPWS), via <u>Onshoregas.DEPWS@nt.gov.au</u>: i. notification of the commencement of hydraulic fracturing activities one week prior to commencement; 	□ Yes □ No ⊠ N/A	Hydraulic fracturing did not occur within the reporting period 15/02/2024 – 14/02/2025.
2.	 ii. A timetable for the regulated activity that is to be provided one week prior to the commencement of the activity and each quarter thereafter, or more frequently should other constraints, such as seasonal weather forecasts or travel restrictions emerge, and including: Time-bound commitments in the EMP; due dates for satisfaction of Ministerial approval conditions; due dates for regulatory reporting; 	⊠ Yes □ No □ N/A	 Timetables for the regulated activity including: time-bound commitments in the EMP; due dates for satisfaction of Ministerial approval conditions; due dates for regulatory reporting; Were provided by email to DLPE via <u>Onshoregas.DLPE@nt.gov.au</u> on the following dates: 28 March 2024 28 June 2024 27 September 2024 And by email to DLPE via <u>Onshoregas.DLPE@nt.gov.au</u> on 29 December 2024

Table 2: Compliance with Ministerial approval conditions

No	Ministerial Condition	Compliant	Evidence
3.	iii. Daily on-site reports indicating the status and progress of vegetation clearing and hydraulic fracturing, and the freeboard available in open wastewater tanks;	⊠ Yes □ No □ N/A	 Daily reports were sent in a weekly email to <u>Onshoregas.DLPE@nt.gov.au</u> within the reporting period 15/02/2024 - until 27/09/2024. Reports included: Status of vegetation clearing Status of hydraulic fracturing (not applicable) Freeboard available in open wastewater tank No vegetation clearing has been undertaken, no hydraulic fracturing and no wastewater tank has been onsite at Carpentaria 1 since 27/9/2024. Submissions under this Ministerial Condition will re- commence when applicable under future works.
4.	iv. A seven-day activity forecast for the duration of the activity during the Wet Season (1 October – 30 April each year);	⊠ Yes □ No □ N/A	Seven-day activity forecasts included in weekly reports sent to Onshoregas.DLPE@nt.gov.au within the reporting period 15/2/24- 30/4/24 and 01/10/2024 – 14/02/2025.
5.	v. Written notification of any halt to the activity due to Wet Season conditions, within 24 hours of the halt;	□ Yes □ No ⊠ N/A	No activities were halted due to Wet Season conditions within the reporting period 15/2/24 – 14/2/2025 of this AEPR.
6.	vi. Immediate written notification of any fires potentially threatening the activity from external or internal sources;	⊠ Yes □ No □ N/A	 Written notification of a potentially threatening fire was sent to <u>Onshoregas.DLPE@nt.gov.au</u> on: 13 June 2024

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No	Ministerial Condition	Compliant	Evidence
7.	vii. Weekly reports that detail the outcome of site inspections, and corrective actions taken, and inclusive of all commitments in the approved EMP, from the commencement of the regulated activity and continuing while the EMP remains in force.	⊠ Yes □ No □ N/A	 Weekly reports were sent to <u>Onshoregas.DLPE@nt.gov.au</u> within the reporting period 15/02/2024 - 14/02/2025. Reports included: Outcome of site inspections with corrective actions taken/ proposed Inspection commitments relevant to EMP 3-4
8.	 Condition 2: In the event of any accidental release of contaminants that exceeds 200 litres (for liquids), the interest holder must provide a written report to DEPWS within 24 hours of the incident being detected. The report must include: i. Details of the incident specifying material facts, actions taken to avoid or mitigate environmental harm; and ii. The corrective actions taken including the volume and depth of impacted soil removed for appropriate disposal if required; and iii. Any corrective actions proposed to be taken to prevent recurrence of an incident of a similar nature. 	□ Yes □ No ⊠ N/A	Spill register records no release of contaminants exceeding 200 L occurring within the reporting period 15/02/2024 - 14/02/2025 of this AEPR. No spill occurred under IMP 3-4.

No	Ministerial Condition	Compliant	Evidence
9.	 Condition 3: The interest holder must provide to DEPWS within 6 weeks of completion of well flowback operations at the Carpentaria-1 well site on EP187 a report on the risk assessment of flowback wastewater from the hydraulic fracturing phase, via Onshoregas.DEPWS@nt.gov.au. The risk assessment must: Prepared by a suitably qualified person;³ and Prepared in accordance with the monitoring wastewater analytes specified in Section C.3 of the Code of Practice: Onshore Petroleum Activities in the Northern Territory. 	□ Yes □ No ⊠ N/A	Completion of well flowback operations did not occur within the reporting period 15/02/2024 – 14/02/2025 of this AEPR.
10.	Condition 4: In support of schedule 1, item 11 of the Petroleum (Environment) regulations 2016 (NT) and clause A.3.5 of the Code, the interest must provide geospatial files of the land disturbance footprints(s) to DEPWS, via Onshoregas.DEPWS@nt.gov.au, within 2 months of completion of each land clearing activity.	□ Yes □ No ⊠ N/A	Land clearing activities did not occur within the reporting period 15/02/2024 – 14/02/2025 of this AEPR.

No	Ministerial Condition	Compliant	Evidence
11.	Condition 5: 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). The first report must cover the 12 month period from the date of the approval, and be provided within three calendar months of the end of the reporting period. The annual environmental performance report must align with the template 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.	⊠ Yes □ No □ N/A	 The IMP3-4.2 2023- 2024 Annual Environmental Performance Report was submitted to <u>Onshoregas.DLPE@nt.gov.au</u> on 14 May 2024, on the required due date. The report covered the period of 15/02/23-14/02/24 and was aligned with the template prepared by DLPE. A revision to the report was submitted to DLPE on 9/9/24 to incorporate feedback from a meeting in Darwin on 30/8/24.
12.	Condition 6 : 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 reported under the <i>Commonwealth National Greenhouse and Energy Reporting Act 2007</i> versus predicted emissions in the EMP.	⊠ Yes □ No □ N/A	The 2023- 2024 IMP 3-4.2 Annual Emissions Report was submitted to <u>Onshoregas.DLPE@nt.gov.au</u> on 19 September 2024, prior to the due date of 30 September 2024. The report summarised actual greenhouse gas emissions versus predicted emission in IMP 3-4.

No	Ministerial Condition	Compliant	Evidence
13.	 Condition 7: Audits of compliance must be undertaken by a suitably qualified and independent person, to be approved by DEPWS, and the audit report provided to DEPWS via Onshoregas.DEPWS@nt.gov.au, no later than two weeks after the completion of the audits, with the focus of the audits as follows: i. conduct a readiness audit prior to commencement of hydraulic fracturing to confirm that EMP commitments have been met and that facilities are suitable to manage all foreseen risks that could occur during hydraulic fracturing; and 	□ Yes □ No ⊠ N/A	No hydraulic fracturing was commenced within the reporting period 15/02/2024 – 14/02/2025 of this AEPR.
14.	 ii. conduct an operational audit during extended production testing to confirm that EMP commitments in relation to wastewater and spill management have been met. 	□ Yes □ No ⊠ N/A	Extended production testing did not occur within the reporting period 15/02/2024 – 14/02/2025 of this AEPR.
15.	Condition 8: In support of clause 16 of the <i>Water Act 1992</i> (NT) and clause B.4.2 of the Code, the interest holder must undertake groundwater level/pressure monitoring at the Carpentaria-1 impact monitoring bore using a logger to record water level for 4 weeks prior to, during, and 4 weeks after completion of hydraulic fracturing operations on Carpentaria-1 well. 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 the Carpentaria-1 impact monitoring bore.	□ Yes □ No ⊠ N/A	No hydraulic fracturing was commenced or completed within the reporting period 15/02/2024 – 14/02/2025 of this AEPR.

No	Ministeri	al Condition	Compliant	Evidence
16.	5. Condition 9: A register must be provided to DEPWS via Onshoregas.DEPWS@nt.gov.au, of the key service providers that will be engaged for the regulated activity, prior to undertaking the relevant scope of work.		⊠ Yes □ No □ N/A	An updated Register of Key Service Providers was submitted to <u>Onshoregas.DLPE@nt.gov.au</u> on 3 September 2024 to fulfill Ministerial Condition 9.
17.	the intere Onshoreg data and based on conducte the Code month of to be det The inter three mo	 n 10: In support of clause B.4.17.2 of the Code, est holder must provide to DEPWS, via gas.DEPWS@nt.gov.au, groundwater monitoring an interpretative report of groundwater quality the groundwater monitoring required to be ad at the well site(s) in accordance with Table 6 of . Groundwater data must be provided within one collection and be provided quarterly, in a format ermined by DEPWS. pretative report must be provided annually within nths of the anniversary of the approval date of and include: 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 inclusive of descriptive statistics 	⊠ Yes □ No □ N/A	Quarterly groundwater monitoring data was undertaken from Carpentaria 1 bores RN41678 and RN41800 and submitted to Onshoregas.DLPE@nt.gov.au on: • 24 May 2024 The Annual IMP 3-4 Annual Groundwater Interpretative Report was sent to <u>Onshoregas.DLPE@nt.gov.au</u> 15 May 2024 (on the required due date) and outlined that Carpentaria 1 water sampling has been monitored for 3 years and that the submitted report marks the end of the scheduled groundwater monitoring. The report was revised on 16 May 2024 and updated to incorporate DLPE feedback 26 November 2024. The report included the required components of Ministerial Condition 10 (i) – (iv).

Table 3 provides a systematic overview of interest holder performance against the environmental outcomes and environmental performance standards within the approved EMP.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
1.	Conduct of the regulated activity does not create safety risks for the public or landholders	Operations carried out in a manner that does not create excessive dust	⊠ Yes □ No □ N/A	Community complaints register shows no complaints received concerning dust generation within the reporting period 15/02/2024 – 14/02/2025.
2.		Speed limits posted on unsealed access tracks adhered to	⊠ Yes □ No □ N/A	Incident management system shows no records of non-adherence to speed limits within the reporting period 15/02/2024 – 14/02/2025.
3.		Dust suppression activities undertaken on unsealed access roads during the Dry Season	⊠ Yes □ No □ N/A	Records show use of water cart for dust suppression linked to site activities within the reporting period 15/02/2024 – 14/02/2025.
4.		Vehicle movements on publicly accessible roads carried out in a safe manner	⊠ Yes □ No □ N/A	Community complaints register shows no complaints received concerning dangerous driving within the reporting period 15/02/2024 – 14/02/2025. Incident management system shows no records of dangerous driving or non-adherence to road rules.
5.		Well site fenced and signposted permanently with the well name, well number, major hazards and details of the interest holder	⊠ Yes □ No □ N/A	Weekly checks confirm that well site is fenced and signage is compliance with the Code of Practice.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
6.		Well site remains fenced at all times to prevent access from livestock	⊠ Yes □ No	Weekly checks confirm well site is fenced throughout the reporting period 15/02/2024 – 14/02/2025.
7.	Sensitive receptors, significant conservation areas, or listed species or their habitat, is not permanently affected by conduct	No vegetation cleared beyond the approved areas	□ N/A □ Yes □ No ⊠ N/A	No vegetation clearing beyond existing areas was undertaken within the reporting period 15/02/2024 - 14/02/2025.
8.	of the regulated activity	No introduction of new weed species, or spread of existing weed populations as a result of conduct of the regulated activity	⊠ Yes □ No □ N/A	Site induction records show personnel inducted and induction materials include requirements related to weed impacts and prevention of spread. IMP 3-4 Annual Post Wet Season Weed Report, submitted to DLPE Weed Officer on 11 July 2024, demonstrates weed control activities undertaken as specified in the Weed Management Plan.
9.		No fires in surrounding areas resulting from conduct of the regulated activity	⊠ Yes □ No □ N/A	Site induction records show personnel inducted and induction materials include requirements related to impacts of wildfire and requirements to prevent offsite fires. Incident management system shows no records of fires resulting from conduct of the regulated activity. Annual regional fire mapping for EP 187 undertaken 8 May 2024.

No Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
10.	All putrescible waste stored in vermin- proof enclosed receptables	⊠ Yes □ No □ N/A	Site induction records show personnel inducted and induction materials include waste segregation, storage and disposal requirements. Records show no incidences of introduced pests in waste storage area.
11.	All listed waste transported by licensed waste contractors	⊠ Yes □ No □ N/A	 Waste records show the removal of Carpentaria 1 Sump Fluids offsite utilising licensed Waste Transporters: NT Recycling Solutions EPL 168-03
12.	No waste is disposed of on-site	⊠ Yes □ No □ N/A	 Waste records show the removal of Carpentaria 1 Sump Fluids offsite utilising licensed Waste Transporters: NT Recycling Solutions EPL 168-03
13.	All waste segregated on-site according to whether it is hazardous, recyclable or for general disposal	⊠ Yes □ No □ N/A	Weekly checks confirm waste appropriately segregated as required throughout the reporting period 15/02/2024 – 14/02/2025 of this AEPR.
14.	Wastewater from drilling stored in lined wastewater sumps	⊠ Yes □ No □ N/A	The weekly checklist confirms that the wastewater sump liners remained intact from 15/02/2024 to 6/12/24 when the sump was closed.
15.	All vehicles, plant and equipment maintained and operator per manufacturer requirements to prevent unnecessary noise or vibration creating disturbance	⊠ Yes □ No □ N/A	Site induction records show all personnel inducted and induction materials include requirements related to minimising noise, vibration and light spill. Records of vehicle maintenance are kept.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
16.		No impacts on landholders or the community regarding from lighting, noise or vibrations	⊠ Yes □ No □ N/A	Community complaints register shows no complaints received concerning light spill, noise, or vibrations within the reporting period 15/02/2024 - 14/02/2025 of this AEPR.
17.		All site lighting directed inward, where practicable	□ Yes □ No ⊠ N/A	Site is currently non-operational throughout the reporting period 15/02/2024 – 14/02/2025. No lights are utilised.
18.	Terrestrial environmental quality, including surface waters, is not permanently affected by conduct of the regulated activity	No ground disturbance occurs outside of designated areas approved for ground disturbance	⊠ Yes □ No □ N/A	Civil Reports submitted under dated from October 2024 – December 2024 confirm civils maintenance was undertaken within the existing lease area, which is approved for ground disturbance.
19.		No vehicle movements outside of designated areas approved for ground disturbance	⊠ Yes □ No □ N/A	Site induction records show personnel inducted and induction materials include prohibition of movement outside of approved areas. Incident management system has no records related to unauthorised movement off-site during the reporting period 15/02/2024 – 14/02/2025.
20.		All liquid chemicals and hazardous substances stored within secondary impermeable containment at all times or bunded areas that can hold 110% of the largest container	⊠ Yes □ No □ N/A	Site induction records show personnel inducted and induction materials include requirements related to the use and storage of hazardous chemicals. Weekly inspection records confirm all hazardous materials stored in compliance with relevant SDS (when onsite).

No Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
21.	All storage vessels for wastewater and hazardous substances are maintained at 100% integrity	⊠ Yes □ No □ N/A	Daily inspection records confirm operational tanks and storage vessels intact and free from defects or tears.
22.	No instances of loss of containment of wastewater	⊠ Yes □ No □ N/A	Incident management system shows no instances of loss of containment of wastewater during the reporting period 15/02/2024 – 14/02/2025.
23.	Freeboard for all wastewater sumps, flowback water tanks and produced water tanks maintained at all times	□ Yes ⊠ No □ N/A	IMP 3-4.2 Q1 Quarterly Recordable Report submitted to DLPE in April 2024 outlines freeboard for the Carpentaria 1 Cutting pit exceeded the Wet Season minimum requirement of 1.1m from the 19 March 2024, for a period of 16 days. Record of exceedance of the freeboard are included in the incident management system and evidence of corrective actions and preventative measures are included.
24.	All spills remediated immediately on discovery	□ Yes □ No ⊠ N/A	No spill occurred. Spills Register shows no record of spills during the reporting period 15/02/2024 – 14/02/2025. Site induction records show personnel inducted and induction materials include requirements to immediately remediate all spills to the ground.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
25.		No water to be taken from surface water sources	⊠ Yes □ No □ N/A	Site induction records show personnel inducted and induction materials include prohibition of use of surface water at any time. Incident management system includes no records of unauthorised use of surface water.
26.	The conduct of the regulated activity does not result in the over extraction or contamination of groundwater resources	Compliance with the groundwater extraction licence	⊠ Yes □ No □ N/A	Groundwater taken is less than maximum permitted volume for the activity as demonstrated by water extraction records submitted online to the 'My Meter' portal monthly until November 2024, in accordance with licence number GRF10316 for approved registered Carpentaria 1 water bore meters: • 41678 – Control monitoring bore • 41800 – Impact monitoring bore Thereafter, submissions are made quarterly under the new licence requirements.
27.		No contamination of aquifers from the regulated activities	⊠ Yes □ No □ N/A	 IMP 3-4.2 Annual Groundwater Interpretive Report confirmed no notable change to groundwater quality between the Control Monitoring and Impact Monitoring Bores. Report submitted to DLPE 16/05/2024 for the reporting period of 15/02/2023 – 28/04/2024. The report was revised on 16 May 2024 and updated to incorporate DLPE feedback 26 November 2024.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
28.	Local inland water quality is not permanently affected by conduct of the regulated activity	No unauthorised vehicle crossing of flowing creeks or watercourses	⊠ Yes	Site induction records show personnel inducted and induction materials include prohibition of crossing of flowing creeks or watercourses, unless approved by Site Manager.
			\Box No	unicss approved by Site Manager.
			□ N/A	Incident management system has no records related to unauthorised crossing of flowing creeks or watercourses during the reporting period 15/02/2024 – 14/02/2025.
29.	Minimise emissions, including greenhouse gases, created by conduct of the regulated activity	Operations carried out in a manner that does not create excessive emissions	⊠ Yes	Community complaints register shows no complaints received concerning excessive emissions from site.
			□ No	
			□ N/A	IMP 3-4.2 Annual Emissions Report 23-24 was submitted to DEPWS 19 September 2024. Scope 1 emissions: 4 tCO ² -e.
30.		All vehicles, plant and equipment	□ Yes	Records of vehicle maintenance are kept.
		maintained and operated per manufacturer requirements to minimise	□ No	
		emissions	⊠ N/A	
31.		Flaring to be used rather than venting during production testing	□ Yes	No production testing occurred during the reporting period 15/02/2024 – 14/02/2025.
			□ No ⊠ N/A	IMP 3-4.2 Annual Emissions Report 23-24 was submitted to DEPWS 19 September 2024. Scope 1 emissions: 4 tCO ² -e

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
32.		Gas leak detection, repair and notification to be conducted throughout all phases of the project that have live equipment	⊠ Yes □ No □ N/A	IMP 3-4.2 Annual Flowback Report submitted to DLPE 7 January 2025 confirms that well head pressure monitoring and 2024 bi-annual leak detection surveys were undertaken. No gas leaks were observed during the reporting period 15/02/2024 – 14/02/2025.

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.

No	Reference	Requirement	Compliant	Evidence
1.	Code cl A.3.5	Geospatial information depicting areas cleared is to be provided to the Minister.	□ Yes □ No	No clearing beyond existing areas was undertaken within the reporting period 15/02/2024 – 14/02/2025.
	EMP Section 10.4		⊠ N/A	
2.	Code cl A.3.6 (b) EMP Section 10.5 Appendix 09	Weed management plan developed as part of the EMP must provide for ongoing weed monitoring.	⊠ Yes □ No □ N/A	 Weed management plan developed as part of the EMP provides for ongoing weed monitoring as per IMP 3-4.2 Appendix 09 Table 5 Annual Action Plan. IMP 3-4 Annual Post Wet Season Weed Report, submitted to DLPE Weed Management Branch 11 July 2024 outlines monitoring undertaken.
3.	Code cl A.3.7(a)vi EMP Section 10.6 Appendix 08	The fire management plan must provide for annual fire mapping.	⊠ Yes □ No □ N/A	Appendix 08 – Fire Management Plan of the approved EMP includes the required clause in Section 8.4.7 Annual regional fire mapping undertaken 8 May 2024.

Table 4: Compliance with mandatory monitoring and reporting requirements

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) EMP Appendix 12	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.	□ Yes □ No ⊠ N/A	Rehabilitation not commenced under IMP 3-4.2.
5.	Code cl B.4.13.2(c) EMP Section 11.15.2	 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. 	□ Yes □ No ⊠ N/A	No hydraulic fluids pumped within the reporting period 15/02/2024- 14/02/2025.
6.	Code cl B.4.13.2(k)iv EMP Section 11.15.4	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.	□ Yes □ No ⊠ N/A	No venting occurred within the reporting period 15/02/2024- 14/02/2025.

No	Reference	Requirement	Compliant	Evidence
7.	Code cl B.4.14.2(c) EMP Section 3.1.1 EMP Section 11.4	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.	□ Yes □ No ⊠ N/A	No updated well barrier integrity validation reports were required within the reporting period 15/02/2024 – 14/02/2025.
8.	Code cl B.4.15.2(j) EMP Section 11.17	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.	□ Yes □ No ⊠ N/A	No decommissioning of petroleum wells occurred within the reporting period 15/02/2024 – 14/02/2025.
9.	Code cl C.6.1(d) EMP Appendix 06 & 07	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	⊠ Yes □ No □ N/A	IMP 3-4.2 Annual Wastewater Report was submitted to <u>Onshoregas. DLPE@nt.gov.au</u> on 27/02/2025 (submission date was outside the reporting period, however the report included the relevant reporting period of 16/2/24 – 15/2/25). Report contents were in accordance with requirements of Clause C.6.1 of the Code of Practice.
10.	Code cl C.7.1(d)ii EMP Appendix 06	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.	⊠ Yes □ No □ N/A	Appendix 06 Wastewater Management Plan includes monitoring commitments in Section 8 Wildlife, stock and human interaction. Inspection records confirm monitoring has been undertaken within the reporting period 15/02/2024 – 14/02/2025.
11.	Code cl D.5.9.2(c) EMP Section 16 Appendix 10	Emissions from exploration, well construction (including during flowback) and workovers must be measured and reports submitted.	⊠ Yes □ No □ N/A	IMP 3-4.2 Annual Emissions Report 23-24 was submitted to DEPWS 19 September 2024. Scope 1 emissions: 4 tCO ² -e

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.	□ Yes □ No ⊠ N/A	No natural gas was vented or flared within the reporting period 15/02/2024 – 14/02/2025.
13.	Reg 33	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.	□ Yes □ No ⊠ N/A	Incident management system includes no records of a reportable incident within the reporting period 15/02/2024- 14/02/2025.
14.	Reg 34	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.	□ Yes □ No ⊠ N/A	Incident management system includes no records of a reportable incident within the reporting period 15/02/2024- 14/02/2025.
15.	Reg 35	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).	⊠ Yes □ No □ N/A	 Quarterly Recordable Reports for IMP 3-4 were sent to <u>Onshoregas.DLPE@nt.gov.au on:</u> Q1 15 April 2024, on the due date of 15 April Q2 15 July 2024, on the due date of 15 July Q3 3 October 2024, prior to the due date of 15 October Q4 10 January 2025, prior to the due date of 15 January
16.	Reg 37A EMP Appendix 06	A report about flowback fluid from hydraulic fracturing must be provided to the Minister within 6 months of the flowback occurring.	□ Yes □ No ⊠ N/A	Report not required during the reporting period 15/02/2024 - 14/02/2025.

No	Reference	Requirement	Compliant	Evidence
17.	Reg 37B EMP Appendix 06	A report about produced water from hydraulic fracturing must be provided to the Minister within 6 months of the produced water being extracted.	□ Yes □ No ⊠ N/A	Report not required during the reporting period 15/02/2024 – 14/02/2025.
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.	□ Yes □ No ⊠ N/A	No new ground disturbing construction, drilling or seismic survey activity was undertaken which required notification during the reporting period of 15/2/2024 – 14/02/2025 under IMP 3-4.2.
19.	EMP Appendix 06 Table 10	Bore water tested for analytes (quality and quantity) monthly during bore operations.	□ Yes □ No ⊠ N/A	No well operations during the reporting period 15/02/2024 – 14/02/2025.
20.	EMP Appendix 06 Table 10	Hydraulic fracturing fluid monitored post blender, before injection at each HF stage.	□ Yes □ No ⊠ N/A	No hydraulic fracturing was undertaken during the reporting period 15/02/2024 – 14/02/2025.
21.	EMP Appendix 06 Table 10	Flowback fluid in each storage tank monitored weekly until fluid has stabilised then every six months for pH, electrical conductivity and analytes.	□ Yes □ No ⊠ N/A	No storage tank was onsite during the reporting period 15/02/2024 – 14/02/2025.
22.	EMP Appendix 06 Table 10	Flowback fluid in each storage tank monitored daily for water level and evaporation rates.	□ Yes □ No ⊠ N/A	No storage tank was onsite during the reporting period 15/02/2024 – 14/02/2025.

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

No	Reference	Requirement	Compliant	Evidence
23.		Produced water in all storage facilities	□ Yes	No produced fluid received during the reporting period
	Table 10	monitored weekly until fluid has stabilised, then every six months for analytes.	□ No	15/02/2024 - 14/02/2025.
		⊠ N/A	⊠ N/A	
24.	EMP Appendix 06	Produced water in all storage facilities	□ Yes	No produced fluid received during the reporting period
	Table 10	monitored daily for water level and evaporation rates.	□ No	15/02/2024 - 14/02/2025.
			⊠ N/A	
25.	EMP Appendix 06	Tank and pond inspection for bird carcasses	🛛 Yes	Inspection records confirm monitoring undertaken on
	Table 10	daily during operations, weekly during non- operational periods.	□ No	Carpentaria 1 tank and ponds during the reporting period 15/02/2024 – 14/02/2025.
		- F	□ N/A	
26.	EMP Appendix 06	Carcasses present during tank and pond	□ Yes	No storage tank was onsite during the reporting period
	Table 10	emptying during final decommissioning.	□ No	15/02/2024 - 14/02/2025.
			⊠ N/A	
27.	EMP Appendix 06	Ad hoc bird and fauna observations and	□ Yes	No storage tank was onsite during the reporting period
	Table 10	photos to be taken around wastewater tanks daily during operations, weekly during non-	□ No	15/02/2024 - 14/02/2025.
		operational periods.	⊠ N/A	
28.	28. EMP Appendix 07 Table 6	· · · ·	⊠ Yes	BoM monitored daily during the reporting period
		identify any predicted significant rainfall events.	□ No	15/02/2024 - 14/02/2025. Records are maintained.
			□ N/A	

No	Reference	Requirement	Compliant	Evidence					
29.	EMP Appendix 07 Table 6			Inspection records confirm monitoring undertaken on Carpentaria 1 sumps during the reporting period 15/02/2024 – decommissioning.					
30.	EMP Appendix 07 Table 6	Visual inspection of hydraulic stimulation fluids and flowback fluid tanks, bunded areas and flowlines, daily during stimulation activities. Levels, integrity, and leak detection monitored.	□ Yes □ No ⊠ N/A	No stimulation activities were undertaken during the reporting period 15/02/2024 – 14/02/2025.					
31.	EMP Appendix 07 Table 6	Visual inspection of spill kits stock and location weekly during stimulation activities.	□ Yes □ No ⊠ N/A	No stimulation activities were undertaken during the reporting period 15/02/2024 – 14/02/2025.					
32.	EMP Appendix 07 Table 6	Tanks structural integrity and freeboard available (when wastewater is stored onsite). Visually check levels, integrity and check for leaks daily during operations during wet and Dry Seasons and weekly during Dry Season and periods of site inactivity.	□ Yes □ No ⊠ N/A	No storage tank was onsite during the reporting period 15/02/2024 – 14/02/2025.					
33.	EMP Appendix 07 Table 6	Visual inspection of chemical storage areas (when chemicals are stored on-site) daily during operations. Inspections includes leak detection and integrity of containment vessels and area.	□ Yes □ No ⊠ N/A	No storage of chemicals on-site during the reporting period 15/02/2024 – 14/02/2025.					

No	Reference	Requirement	Compliant	Evidence
34.	EMP Appendix 10 Table 1	Operation staff to carry personal calibrated gas detectors during every routine operational visit to well sites during ongoing well operations/ suspension.	□ Yes □ No ⊠ N/A	No well operations during the reporting period 15/02/2024 – 14/02/2025.
35.	EMP Appendix 10 Table 1	Each well and equipment on a well pad to be inspected every six months for leaks using a US EPA Method 21.	⊠ Yes □ No □ N/A	 IMP 3-4.2 Annual Flowback Report submitted to DLPE 7 January 2025 confirms that well head pressure monitoring and 2024 bi-annual leak detection surveys were undertaken: June 2024 October 2024

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	47	56%
Not Compliant	1	1%
Not Applicable	36	43%

3.2. Overview of non-compliant items

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

Over	Overview of non-compliance									
1. M	1. Ministerial approval conditions									
	□ Yes	Non-compliance with ministerial approval conditions?								
	🖾 No	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. Ei	nvironmental outcomes									
	□ Yes	Non-compliance with environmental outcome?								
	⊠ No	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								

3. EI	3. Environmental performance standards:										
3.1	⊠ Yes □ No	Non-compliance with environmental performance standard? If yes, complete the sections below. If more than one instance, copy the rows below for each environmental performance standard not complied with. If no, proceed to 4. Regulatory Reporting or Record Keeping									
3.2	Environmental performance standard	Table 3 of this report EPS #23: Freeboard for all wastewater sumps, flowback water tanks and produced water tanks maintained at all times.									
3.3	Summary of non-compliance	IMP 3-4.2 Q1 Quarterly Recordable Report submitted to DLPE in April 2024 outlines freeboard for the Carpentaria 1 Cutting pit exceeded the Wet Season minimum requirement of 1.1 m from the 19 March 2024, for a period of 16 days. This was caused by rainfall associated with tropical low ex-cyclone Meagan. Freeboard of 1100 mm was regained on 4 April 2025 due to fluid evaporation.									
3.4	Evidence used to detect non-compliance	Sensor level data. IMP 3-4.2 Q1 Quarterly Recordable Report submitted to DEPWS April 2024.									
3.5	□ Yes ⊠ No	Environmental harm arising from non-compliance If yes, complete section below. If no, proceed to row 3.7.									
3.6	If yes, describe nature and scale of impact and actions to remediate and rehabilitate										
3.7	If no, describe how determined no impact	Contingency freeboard of 1083 mm was still available on 3 April 2024 which was ample capacity to contain multiple further heavy rainfall events. No risk of overtopping. No spills occurred.									
3.8	□ Yes ⊠ No	Administrative non-compliance									
3.9	If yes, describe nature of non-compliance	Not Applicable.									
3.10	Immediate corrective actions implemented	Monitoring undertaken via cameras, remote sensors, helicopter deployment and weather forecasts to verify remaining freeboard adequate to avoid overtopping.									
3.11	Future corrective actions to prevent reoccurrence	Cutting Pit and Sump closure commenced in December 2024.									

4. R	egulatory reporting or record k	eeping									
	□ Yes	Non-compliance with regulatory reporting or record keeping?									
	⊠ No	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										
5. M	Ionitoring										
	□ Yes Non-compliance with monitoring requirements?										
	⊠ No	If yes, complete the sections below. If more than one instance, copy the rows below for each monitoring requirement not met.									

4. Attachments

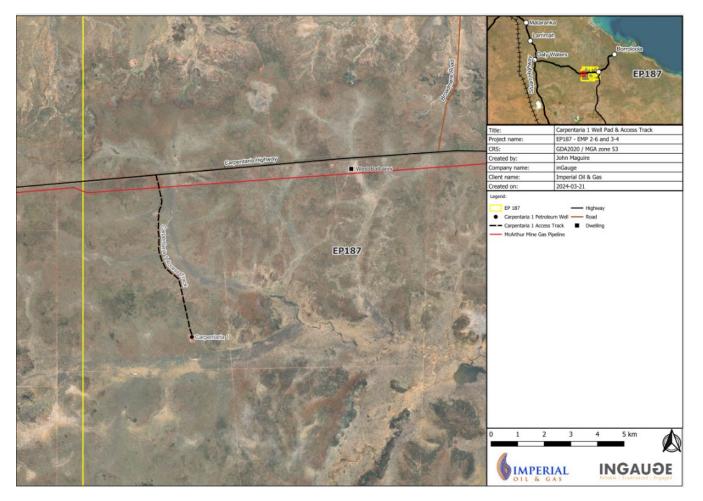


Figure 1: Project Location Map of Works Associated with IMP 3-4

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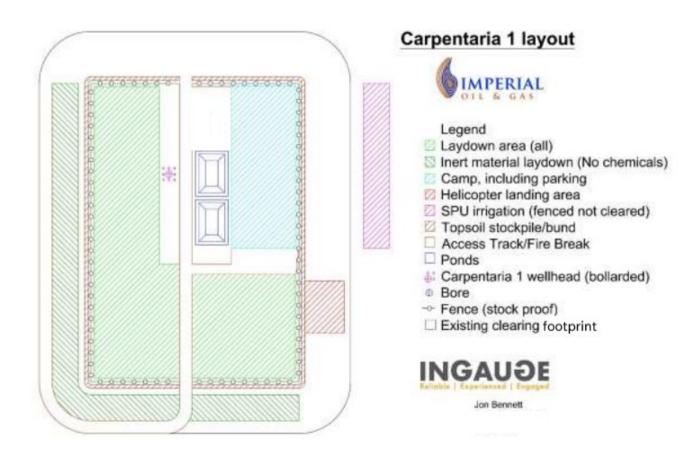


Figure 2: Carpentaria 1 Indicative Well Pad Layout

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Task Name	Feb '24 29 5	12 19 26	Mar '24 4 11	18 25 A	or '24 1 8 15	May 22 29	24 6 13 20	Jun '24	4 10 17	Jul '24 24 1	8 15 22	Aug '24	12 19 2	Sep '24 6 2 9	16 23	Oct '24 30 7 1	14 21 2	Nov '24	18 25	Dec '24 2 9	16 23	Jan '25 30 6 13	Feb '25
Carpentaria well shut in for pressure build-up															1000								
Storage of wastewater at Carp 1 sumps																							
Carp 1 Sumps closure and Rehabilitation																		l.					
Carpentaria 1 Fluid Removal																							

Figure 3: Gantt chart of regulated activities during the reporting period