Modification Notice - Regulation 22

Interest Holder	**Imperial Oil and Gas**	**EMP Title**	**Carpentaria Pilot Project** **Imperial Oil & Gas** **EP 187**	**Unique EMP ID No.**	**IMP 5-3**	**Mod No.**	**6**	**Date**	August 2026
Brief Description	This Reg 22 provides notification under the Petroleum (Environment) Regulations 2016 NT that additional above-ground tank storage capacity at the wellpad locations is required as a modification to the approved Environmental Management Plan, IMP 5-3. Currently, IMP 5-3 only indicates one (1) 13 ML contingency tank per wellpad and a water handling station (WHS) to be built at a centralised location. This amendment adds up to three (3) 13 ML tanks per wellpad as an additional approved configuration. The tanks will be located within existing wellpad disturbance footprints, requiring no additional clearing. The total wastewater volume is not increased though this modification, just the location of the tanks. Allowing wastewater tanks to be situated at the wellpad allows for maximum re-use of wastewater. The modification allows for tanks and wet season contingency tanks to be located at the wellpad a time when the WHS has not yet been constructed. Additionally, the use of tracer wire for buried flowlines has been updated in the Monitoring and Commitments framework of the IMP 5-3 EMP and replaced with the APGA code of practice requirement. The Spill Management plan has also been updated to reflect the improvements adopted post the 2025 incident investigation table 7.1. All existing controls remain applicable to each modification, ensuring that the environmental risk profile remains acceptable and managed to ALARP.								

NORTHERN TERRITORY GOVERNMENT

Geospatial Files Included?	NA						
Does the proposed change result in a new, or increased, potential or actual environmental impact or risk?	**If an INCREASE in an existing potential or actual environmental impact or risk is it provided for in the approved EMP?**	**Does the proposed change require additional mitigation measures to be included?**	**Has additional stakeholder engagement been conducted?**	**Does it require additional environmental performance standards and measurement criteria?**	**Does it affect compliance with Sacred Site Authority Certificates?**	**Does it affect current rehabilitation, weed, fire, wastewater, erosion and sediment control, spill or emergency response plans?**	**Will the environmental outcome continue to be achieved and will the impacts and risks be managed to ALARP and acceptable?**
No	No	No	No. Not applicable.	Yes	No. Not applicable.	No.	Yes

Current EMP Text

Table. ii Summary of Activity

Waste & Wastewater			
Generation		Storage & Handling	
HF Flowback Generated (ML)	~35 ML / well (Intended to be reused)	Number of Above-ground Tanks	Water Handling Station: Main configuration up to 110 ML in capacity. Indicatively

Amended EMP Text

Table. ii Summary of Activity

Waste & Wastewater			
Generation		Storage & Handling	
HF Flowback Generated (ML)	~35 ML / well (Intended to be reused)	Number of Above-ground Tanks	Water Handling Station: Main configuration up to 110 ML in capacity. Indicatively

<table>
<tr><th>Current EMP Text</th><th>Amended EMP Text</th></tr>
<tr><td>
<table>
<tr><td></td><td></td><td></td><td>planned to be one 55 ML and four smaller above-ground tanks.

Well pads and WHS: Up to one contingency 13 ML tank per pad (theoretical max amount of 7 contingency tanks)</td></tr>
</table>
</td><td>
<table>
<tr><td></td><td></td><td></td><td>planned to be one 55 ML and four smaller above-ground tanks.

Well pads and WHS: Up to three contingency 13 ML tank per pad (theoretical max amount of 7 contingency tanks)</td></tr>
</table>
</td></tr>
<tr><td>Section 3.7 Flowline Networks
3.7.2 Flowline Design, Installation, and Operations
3.7.2.5 Pipe Survey

A survey will be carried out to locate the flowlines and related infrastructure relative to permanent marks and benchmarks that conform to the Mapping Grid of Australia (MGA 94) or other approved Datum. All buried flowlines will have a detectable tracer wire installed.</td><td>Note:
• Strikethrough text in plum indicates removal
• Added new text in plum

Section 3.7 Flowline Networks
3.7.2 Flowline Design, Installation, and Operations
3.7.2.5 Pipe Survey</td></tr>
</table>

<table>
<tr><th>Current EMP Text</th><th>Amended EMP Text</th></tr>
<tr><td></td><td>~~A survey will be carried out to locate the flowlines and related infrastructure relative to permanent marks and benchmarks that conform to the Mapping Grid of Australia (MGA 94) or other approved Datum.~~ ~~All buried flowlines will have a detectable tracer wire installed.~~

During Flowline construction each flowline joint in the ROW shall be surveyed with an accuracy no more than +/- 40mm. The survey data shall be kept as an accurate as-built record of the Flowline centre line.</td></tr>
<tr><td>Section 8 Implementation Strategy
Section 8.2 Monitoring

Table 8.2—2 Summary of the Monitoring and Commitments Outlined in this EMP and its Appendices

<table><tr><th>Monitoring Requirements</th><th>Frequency</th><th>Monitoring</th><th>EPS#</th></tr><tr><td>All buried flowlines will have a detectable tracer wire installed.</td><td>Flowline construction.</td><td>15</td><td>EPS-SS4</td></tr></table></td><td>Note:
• Strikethrough text in plum indicates removal
• Added new text in plum

Section 8 Implementation Strategy
Section 8.2 Monitoring
Table 8.2—2 Summary of the Monitoring and Commitments Outlined in this EMP and its Appendices

<table><tr><th>Monitoring Requirements</th><th>Frequency</th><th>Monitoring</th><th>EPS#</th></tr><tr><td>~~All buried flowlines will have a detectable tracer wire installed.~~

All buried flowlines will be surveyed with an accuracy no more than +/- 40mm. The</td><td>Flowline construction.</td><td>15</td><td>EPS-SS4</td></tr></table></td></tr>
</table>

<table>
<tr><th>Current EMP Text</th><th>Amended EMP Text</th></tr>
<tr><td></td><td>
<table>
<tr><td>survey data shall be kept as an accurate as-built record of the Flowline centre line.</td><td></td><td></td><td></td></tr>
</table>
</td></tr>
<tr><td>IMP 5-3 Appendix 06 Waste and Wastewater Management Plan
Section 4 Wastewater Management
Table 4—1 Wastewater Storage Summary
<table>
<tr><th>Storage</th><th>Max Capacity</th><th>Indicative Configuration</th><th>Details</th></tr>
<tr><td>Above Ground Tank(s) (Contingency)</td><td>Up to 13 ML (per contingency tank)</td><td>Up to one per well pad and WHS</td><td>Further detailed in Section 4.1 and 4.3.</td></tr>
</table>
</td><td>IMP 5-3 Appendix 06 Waste and Wastewater Management Plan
Section 4 Wastewater Management
Table 4—1 Wastewater Storage Summary
<table>
<tr><th>Storage</th><th>Max Capacity</th><th>Indicative Configuration</th><th>Details</th></tr>
<tr><td>Above Ground Tank(s) (Contingency)</td><td>Up to 13 ML (per contingency tank)</td><td>Up to three per well pad and WHS</td><td>Further detailed in Section 4.1 and 4.3.</td></tr>
</table>
</td></tr>
<tr><td>IMP 5-3 Appendix 06 Waste and Wastewater Management Plan
Section 4.2 Flowline Design

A survey will be carried out to locate the flowlines and related infrastructure relative to permanent marks and benchmarks that conforms to Mapping Grid of Australia (MGA 94) or other approved datum. All buried flowlines will have a detectable tracer wire installed.</td><td>Note:
• Strikethrough text in plum indicates removal
• Added new text in plum

IMP 5-3 Appendix 06 Waste and Wastewater Management Plan
Section 4.2 Flowline Design

~~A survey will be carried out to locate the flowlines and related infrastructure relative to permanent marks and benchmarks that conforms to Mapping Grid of~~</td></tr>
</table>

<table>
<tr><th>Current EMP Text</th><th>Amended EMP Text</th></tr>
<tr><td></td><td>~~Australia (MGA 94) or other approved datum. All buried flowlines will have a detectable tracer wire installed.~~

All buried flowlines will be surveyed with an accuracy no more than +/- 40mm. The survey data shall be kept as an accurate as-built record of the Flowline centre line.</td></tr>
<tr><td>IMP 5-3 Appendix 07 Spill Management Plan
Section 7.3 Monitoring

Monitoring includes:

• Secondary containment monitored weekly during the Dry Season and daily during the Wet Season in accordance with A.3.8.(i) of the Code. If secondary containment is compromised, it must be repaired as soon as practicable.

o Monitoring of secondary containment may be done remotely via camera.

• Above ground tanks will be double-lined and have leak detection sensors placed between liners that can be monitored remotely.
• Level sensors will be installed in the above-ground tanks and wastewater sumps to measure freeboard and will be calibrated to ensure accuracy. Frequency is described in Section 6.2 of Appendix 06 (Waste and Wastewater Management Plan).</td><td>Note:
• Replaced the section with a table in plum text.

IMP 5-3 Appendix 07 Spill Management Plan
Section 7.3 Monitoring

Table 7—1 Monitoring

<table>
<tr><th>Activity</th><th>Frequency/ Monitoring Event</th><th>Requirements</th><th>Person Responsible</th></tr>
<tr><td>Refuelling</td><td>Continuous, during refuelling activities</td><td>• With bulk diesel fuel tank equipped with safety cut-off valves and spill kits must be accessible.</td><td>Refuelling operator</td></tr>
<tr><td>Above Ground Tank and Lined Drilling Sumps</td><td>Remote sensor or visual inspection,</td><td>• Calibrated per manufacturer’s specs</td><td>Site Personnel Compliance Team</td></tr>
</table>
</td></tr>
</table>

Current EMP Text	Amended EMP Text			
	Level Sensors to verify Freeboard	Weekly (Dry Season) Daily (Wet Season)	• Alarms for abnormal levels.	
	Secondary Containment Checks	Weekly (Dry Season) Daily (Wet Season)	• Inspect for integrity, leaks, or pooling (per Code Section 6.2 – EPS Code CMC 402.02 • Remote cameras acceptable.	Site Personnel
	Hazardous Chemical storage	Weekly (Dry Season) Daily (Wet Season)	• To be stored in secondary containment which can hold 100% of the largest container	Site Personnel
	Above-Ground Tank Leak Detection	Real-time via Remote sensor alerts	• Leak detection sensors installed between liners • Immediate alarms for detected leaks	Site Personnel Compliance Team
	Fluid Transfers in accordance with (TREAD)	During transfer	• Designated person is available to supervise and walk the line during the	Site Personnel Project Manager

Current EMP Text	Amended EMP Text			
			transfer. (See Section 9.4 of this SMP)	
	Tank Cover Fluid Sampling	Fluid sampled prior to discharge to ESC measures and twice daily during discharge pumping.	• Fluid tested for pH and EC. Results must be between 6-9 pH and EC between 1-1,500 uS/cm to discharge fluid to ground.	Site Personnel Project Manager
		Weekly monitoring of discharge area	• Discharge area inspected for signs of impact weekly when fluid is being actively pumped from the Tank Cover.	Site Personnel