

Onshore Petroleum Activity – NT EPA Advice

BR SIMPSON PTY LTD –SIMPSON DESERT SEISMIC ENVIRONMENT MANAGEMENT PLAN (EMP), EP93, EP97 & EP107 (BRS1-5)

BACKGROUND

The Minister for Environment, Climate Change and Water Security has formally requested under section 29B of the *Northern Territory Environment Protection Authority Act 2012* (NT EPA Act) that the Northern Territory Environment Protection Authority (NT EPA) provide advice on all Environment Management Plans (EMPs) received under the Petroleum (Environment) Regulations 2016 (the Regulations).

That advice must include a recommendation on whether the EMP should be approved or not, supported by a detailed justification that considers:

- whether the EMP is appropriate for the nature and scale of the regulated activity to which the EMP relates (regulation 9(1)(b))
- the principles of ecologically sustainable development (regulation 2(a)), as set out in sections 18 to 24 of the *Environment Protection Act 2019* (NT)
- whether the EMP demonstrates that the activity will be carried out in a manner by which the environmental impacts and environmental risks of the activity will be reduced to a level that is as low as reasonably practicable and acceptable (regulation 9(1)(c))
- any relevant matters raised through the public submission process.

In providing that advice, the NT EPA Act provides that the NT EPA may also have regard to any other matters it considers relevant.

ACTIVITY

Subject	Description
Interest holder	BR Simpson Pty Ltd (BR Simpson)
Petroleum interest(s)	Exploration Permits 93, 97 & 107
Environment Management Plan (EMP) title	BR Simpson Environmental Management Plan Simpson Desert Seismic EP93, EP97 & EP107
EMP document reference	BRS1-5
Regulated activity	The EMP proposes a seismic program across three permits areas. The regulated activity includes: <ul style="list-style-type: none"> • establishment of 10 seismic lines (~644 linear km) • acquisition of 2D seismic data • land clearing for three temporary camps (totalling 12 ha) • land clearing for new tracks and re-establishment of existing tracks • Rehabilitation

Public consultation	Public consultation on the EMP was not required under regulation 8A(1)(b) as the EMP does not propose drilling or hydraulic fracturing.
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NT EPA ADVICE

1. Is the EMP appropriate for the nature and scale of the regulated activity (regulation 9(1)(b))

Information relating to the nature and scale of the regulated activity is provided in the EMP in a clear format. Table 1 provides an overview of the key components of the regulated activity and worst-case potential impacts. The proposed work program is scheduled to take place over an 80 day period between October 2023 and September 2024.

Table 1: Key components of the proposed work program

Component/aspect	Proposed
AAPA certificates	C2021/010, C2021/011 & C2021/012
Total area of EP93, 97 and 107	27,454 km ²
Seismic lines	~644 km (~290 ha)
Access tracks	~392 km (~176 ha, which includes 24 ha which is also a seismic line)
Total area of surface disturbance, including use of previously cleared areas	~454 ha
Total area of vegetation clearing (new seismic lines, camps and access tracks)	~119 ha
Number of exploration wells	N/A
Groundwater extraction license	N/A
Groundwater usage	~1 ML (total)
Groundwater extraction bores	Bravo bore (RN018519) & Blamore Bore (RN018517)
Gravel pits	N/A
Extended production testing	N/A
Camp	A 50 person mobile camp at three locations
Peak traffic movements	22 vehicles (16 light vehicles and 6 heavy vehicles) during mobilization/demobilisation
Average traffic movements	8 vehicles (6 light vehicles and 2 heavy vehicles) per day
Greenhouse gas emissions	~1,588 – ~1,664 tCO ₂ -e dependent on the extent of clearing required

1.1 Activity Scope and Duration

This EMP proposes a ~644 km 2D seismic program across 10 seismic lines (at 4.5m width) on the three neighbouring petroleum exploration titles EP93, EP97 and EP107. These titles are between 150 and 350 km southeast of Alice Springs and extend across parts of Andado Station (NT Portions 1104 and 1361), the Pmer Ulperre Ingwemirne Arletherre Aboriginal Land Trust (ALT) (NT Portion 3998) and Simpson Desert Crown Land (NT Portions 4207 and 4209).

Previous interest holders have undertaken seismic and/or well drilling operations across these petroleum exploration permits before the Regulations came into force. The regulated activity includes use of tracks previously established during historic exploration activities, in addition to

existing tracks that run through the Andado and Snake Creek Lakes Sites of Conservation Significance (SOCS) on Andado Station.

A mobile camp is proposed which will be established at three locations during the seismic program, due to the large distances between the seismic lines and to minimise vehicle movement on tracks.

The expected total disturbance area is ~454 ha. The regulated activity will result in a total of ~302 ha new disturbance from establishment of seismic lines (~290 ha), establishment of three temporary camps (12 ha) and establishment of new tracks. The EMP indicates ~119 ha of this disturbance area will require blade-down clearing to establish access and camp areas. The amount of new disturbance area has been minimised through re-use of current pastoral and exploration tracks (~152 ha) and reuse of part of a seismic line as a track (~24 ha).

Civil works, seismic data acquisition and progressive rehabilitation is proposed to be conducted over an ~80 day period between October 2023 and September 2024. Rehabilitation activities are to be conducted concurrent with the seismic activities and be completed shortly after seismic activities cease at each location. After this 80 day period, the interest holder will undertake annual rehabilitation monitoring and maintenance. It is estimated that ~1 ML of groundwater will be extracted from existing groundwater bores established under previous exploration activities. Under Government Gazette No. S109 (20 December 2018) a groundwater extraction licence is not required for annual extractions less than 5 ML.

Particular environmental sensitives considered in the EMP include:

- the locations of existing tracks and their proximity to a Stream Order 4 creek and Sites of Conservation Significance
- locations of environmentally and culturally sensitive features and avoidance of impact on these features
- avoidance of habitats for threatened fauna and flora species.

The potential impacts and risks of the regulated activity have been identified and controls are reflected in the relevant environmental outcomes, performance standards and measurement criteria in the EMP. Mitigations outlined in the risk register are appropriate for the potential impacts identified and the EMP is clear on any uncertainty. Where appropriate, the NT EPA has also provided advice relating to Ministerial conditions at the end of this advice.

The level of detail and quality of information provided in the EMP is sufficient for the nature and scale of the regulated activity and to inform the evaluation and assessment of potential environmental impacts and risks, and meets the EMP approval criteria under Regulation 9(1)(b).

1.2 General compliance with the Code

The EMP demonstrates how the interest holder will comply with the relevant requirements of the Code of Practice: Onshore Petroleum Activities in the Northern Territory (the Code) in undertaking the regulated activity. Table 3 in the EMP cross references relevant sections of the Code that apply to the mitigation and management measures to enable the reviewer to identify and confirm that the proposed regulated activity complies with the Code. The EMP also provides the following plans, which are compliant with the Code:

- Erosion and Sediment Control Plan (Appendix F)
- Weed Management Plan (Appendix G)
- Bushfire Management Plan (Appendix H)
- Waste Management Plan (Appendix I)
- Oil Spill Contingency Plan (Appendix J)
- Rehabilitation Plan (Appendix K)

- Emergency Response Plan (Appendix L).

The current EMP shows an adequate consideration of potential impacts and risks of the regulated activity and proposes appropriate controls, consistent with the Code.

2. Principles of ecologically sustainable development (regulation 2(a))

2.1 Decision-making principle

The EMP adequately assesses the environmental impacts and risks associated with the regulated activity and outlines appropriate avoidance and mitigation measures. The potential impacts and risks of the regulated activity have been identified and controls are reflected in the relevant environmental outcomes, performance standards and measurement criteria that have been provided in the EMP.

Ongoing stakeholder engagement is demonstrated in the EMP, with directly affected stakeholders identified as required by the Regulations. The stakeholder engagement detailed in Appendix N demonstrates the relevant land holders have been consulted on the proposed activities.

2.2 Precautionary principle

The NT EPA considers there is a low threat of serious or irreversible damage from the regulated activity. The interest holder's investigations into the physical, biological and cultural environment provide a satisfactory scientific basis to assess potential environmental impacts and risks, and to identify measures to avoid or minimise those impacts and risks.

The potential impacts to threatened fauna and flora and their habitats are well understood and the regulated activity was amended by moving camps and shortening seismic lines and tracks to avoid impact to identified threatened fauna and flora species, the Mac Clarke Conservation Reserve, parts of the Todd River flood out and other sensitive features. The location of a proposed camp was moved to avoid impact to the Plains Mouse Protection Area and no modification of existing tracks will occur where they traverse through Sites of Conservation Significance. The use of existing tracks and blade-up clearing where possible has minimised new land disturbance that requires remediation.

The EMP includes assessment of potential impacts related to soil and water from the transport, storage and use of hydrocarbons and demonstrates adherence to the best practice management measures provided for in the Code, as set out in the risk assessment, Waste Management Plan and Oil Spill Contingency Plan. The EMP includes the assessment of impacts and risks for wet season operations and management strategies, including measures such as halting activities if there is significant rainfall and the inspection of erosion and sediment control measures.

The EMP complies with the Code requirement to track water use, and groundwater use will be metered and recorded weekly to ensure that extraction does not exceed the expected use of approximately 1 ML.

The NT EPA is of the view that the precautionary principle has been considered in assessing the regulated activity and has not been triggered due to the low threat of serious or irreversible damage existing and the presence of a satisfactory scientific basis to assess potential impacts and risks. In addition, the existing environmental monitoring commitments contained in the EMP are compliant with the Code and should provide measureable performance measures to ensure that the environmental outcomes are met. However, an approval condition is recommended to ensure the timing is clear for all monitoring and inspection activities.

2.3 Principle of evidence-based decision-making

The environmental considerations of the regulated activity were informed by a desktop and two baseline ecological and archaeological assessments in those areas where the regulated activities are proposed. The studies undertaken by the interest holder to inform the EMP affords the interest holder with a reasonable knowledge of the potential environmental impacts and risks and the most appropriate measures for mitigation of those impacts and risks.

The risk assessment clearly demonstrates consideration of risk events in the context of the environment in which the regulated activity is conducted and its particular values and sensitivities, and the spatial extent and duration of the potential impact. The risks of conducting the activity over the wet season are understood, and the EMP demonstrates adherence to the requirements of the Code. As a precautionary step the NT EPA has recommended a Ministerial condition related to the recording of spills.

The proposed environmental outcomes are likely to be achieved based on the best available information, the nature and scale of the activity, and the environment in which the regulated activity will be conducted.

The NT EPA is of the view that the evidence-based decision-making principle has been considered in assessing the regulated activity and that in the circumstances, decisions can be based on best available evidence that is relevant and reliable.

2.4 Principle of intergenerational and intra-generational equity

The potential environmental impacts and risks associated with the regulated activity can be adequately avoided or managed through the management measures and ongoing monitoring programs proposed in the EMP.

Protection of identified Sacred Sites is achieved through compliance with the requirements of three Authority Certificates issued by the Aboriginal Areas Protection Authority (C2021/010, C2021/011 and C2021/012) and through implementing the recommendations from the cultural heritage assessment (Appendix B). The EMP uses avoidance as a key control against affecting sensitive features along the seismic lines. This includes ensuring sufficient clearance in Authority Certificates to move seismic lines to avoid sensitive features.

The maximum emissions generated by the regulated activity is anticipated to be ~ 1,664 tonnes of CO₂ equivalent (tCO₂-e), resulting from land clearing and use of hydrocarbons in vehicles and equipment.

The proposed seismic line clearing techniques (primarily blade up), weed management and progressive rehabilitation are considered to reduce the risks of ongoing erosion and sediment issues and poor vegetation re-establishment, to as low as reasonably practical (ALARP) and acceptable levels.

The NT EPA considers that environmental values will be protected in the short and long term from the activities outlined in the EMP and that the health, diversity and productivity of the environment will be maintained for the benefit of future generations.

2.5 Principle of sustainable use

Exploration activities are necessary to enable commercial appraisal of resources. In the absence of reliable data regarding the resource, the likely exploration activities will take a number of years to complete, in order to assess the viability of the resource prior to production.

The cumulative impact assessment concluded the risk to other road users from increased traffic is expected to be minor considering the low traffic volumes and the location of the regulated activity.

Similarly, the expected total emissions of ~ 1,664 tCO₂-e are considered to be negligible, and the low volume of groundwater required for the activity (~ 1 ML) is not expected to impact water availability for other users. If required, potable water will be commercially sourced from Alice Springs.

The NT EPA is of the view that the sustainable use principle has been considered in assessing the regulated activity.

2.6 Principle of conservation of biological diversity and ecological integrity

Site selection for the regulated activity was informed by the ecological assessment carried out. The project footprint is located in the Simpson–Strzelecki Dunefields bioregion, which has an arid to sub-tropical climate, including the driest area of Australia. The bioregion includes sand plains, long parallel sand dunes, fringing dunefields, ephemeral watercourses, paleo-channels, and salt and clay pans. Vegetation is predominantly spinifex hummock grasslands with some *Acacia* shrublands and narrow River Gum and Coolibah woodlands. These vegetation communities are regionally extensive across the bioregion and the regulated activity poses a low risk to the ecosystem within this bioregion.

The EMP identifies 17 listed species and nine migratory species under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) within the project region. The assessment indicated that three of the listed species have a high likelihood of occurrence based on habitat suitability and previous records. A further four listed species that are likely to occur (listed under the EPBC Act and/or the *Territory Parks and Wildlife Conservation Act 1976*) were identified by the Flora and Fauna Division and incorporated into the EMP.

The listed species likely to occur in the project area are:

- Plains Mouse (*Pseudomys australis*) (Vulnerable)
- Thick-billed Grasswren (western) (*Amytornis modestus indulkanna*) (Vulnerable)
- Grey Falcon (*Falco hypoleucos*) (Vulnerable)
- Crest-tailed Mulgara (*Dasyercus cristicauda*) (Vulnerable)
- Bronzeback Snake-lizard (*Ophidiocephalus taeniatus*) (Vulnerable)
- Waddy, Waddi, Waddy-wood (*Acacia peuce*) (Vulnerable)
- Birds Nest Wattle (*Acacia pickardii*) (Vulnerable).

The remaining listed species were assessed as having a low or no likelihood of occurring within the project footprint.

The project footprint adjoins and enters the Andado and Snake Creek SOCS. This SOCS overlays the Andado Site of Botanical Significance (SOBS), largely overlays the Plains Mouse (*Pseudomys australis*) Protection Area and is a proposed petroleum reserve. Separated from, but completely surrounded by the Andado and Snake Creek SOCS, is the Mac Clarke Conservation Reserve. This reserve was set up primarily for the protection of the listed species *Acacia peuce*.

Activities proposed in the SOCS are limited to travel on existing pastoral and exploration tracks. No tracks will be used through the Mac Clarke Conservation Reserve due to the environmental sensitivities within this area. Controls have been described in the EMP for travel through habitat associated with the Plains Mouse Protection Area to prevent impact on this listed species. Further controls are also detailed in the EMP to avoid impact on other listed species and habitats, which may be located outside of the SOCS.

Some of the proposed seismic lines pass through the Old Todd River Floodout SOBS, a site of bioregional significance. The seismic line corridor allows for movement within a 300 m wide corridor to avoid impacts on the identified sensitive features in this, and other, areas.

The interest holder has reduced the extent and number of proposed seismic lines to avoid impact on identified sensitive features. For instance, seismic lines have been shortened to avoid dense vegetation or to avoid rocky escarpment areas with *Acacia peuce* and heritage sites.

Specific precautions to ensure interaction with wildlife is avoided are included in the EMP. These include only using existing tracks through the SOCS area, identifying key habitats to avoid during seismic line route selection, having speed limits on unsealed roads and slowing vehicles when passing wildlife.

Avoidance and mitigation measures identified in the EMP are adequate to reduce risks to biodiversity to ALARP and acceptable levels. Clearing of core habitat for threatened fauna and flora has been avoided and it is unlikely that the regulated activity will pose a risk to the identified listed species. Due to the management strategies outlined in the EMP, and the very large area of similar habitat within the region, it is unlikely that the regulated activity will pose a risk to the regional populations of identified listed species.

The EMP outlines measures to minimise impacts on affected environmental values, including the management of threatening processes such as erosion, weeds and fire. The proposed management plans are consistent with the requirements of the Code, the NT Land Clearing Guidelines and the Weed Management Planning Guideline: Onshore Petroleum Projects.

The NT EPA considers that implementation of, and compliance with, the EMP will ensure the conservation of biological diversity and ecological integrity is not impacted by the regulated activity.

2.7 Principle of improved valuation, pricing and incentive mechanisms

The interest holder is required to prevent, manage, mitigate and make good any contamination or pollution arising from the regulated activity, including contamination of soils, groundwater and surface waters through accidental spills.

All stages of the regulated activity, including land clearing, disposal of waste and progressive rehabilitation of disturbed areas, are at the cost of the interest holder. The interest holder is required to provide an environmental security bond to indemnify the NT Government, with the amount to be determined by the Minister.

The NT EPA is of the view the principle of improved valuation, pricing and incentive mechanisms has been considered in assessing the regulated activity and is based on the interest holder bearing any environmental costs for the activity.

3. Environmental impacts and risks reduced to a level that is as low as reasonably practicable (ALARP) and acceptable (regulation 9(1)(c))

The interest holder has committed to identified measures to avoid or minimise impacts on environmental values, informed by a baseline studies. The EMP systematically identifies and assesses environmental impacts and risks associated with the regulated activity.

The EMP demonstrates why the controls to be implemented are considered ALARP and acceptable. Of the 27 risks identified in Appendix E and four risks identified in Appendix J, 26 risks are assessed as “low” if carried out in accordance with the mitigations and controls proposed in the EMP and therefore are ALARP and acceptable. The remaining five risks are considered ‘moderate’ and the interest holder has included mitigations that can/will be implemented such that the risks will therefore be managed at levels that are ALARP and acceptable. Specifically:

1. Implementing soil erosion and resulting sedimentation controls include using existing roads and tracks where practical, using selective routes and clearing techniques for avoiding or minimising sub-surface and vegetation disturbances (e.g. blade-up clearing), stabilising disturbed areas (as outlined in the Erosion and Sediment Control Plan), and remediating disturbed areas progressively as soon as practicable on cessation of the regulated activity.
2. Implementing protection controls for significant habitat (including for threatened species), mostly by selective clearing and route selection to avoid clearing habitat areas and large trees, Coolabah swamps and claypans, while minimizing impacts to patches of shrubs and dune crests.
3. Impacts from transport, storage and use of hydrocarbons will be managed by storing and transporting fuel and flammable chemicals as per Australian Standards, conducting regular equipment inspections, loading and unloading fuel in bunded areas, by having spill kits and spill clean-up and disposal procedures and having triggers for wet season transport risks.

The EMP also considers cumulative impacts on regional exploration, traffic and social activities and concludes that these impacts have been managed to ALARP and acceptable levels.

The NT EPA considers that all reasonably practicable measures will be used to control the environmental impacts and risks, considering the level of consequence and the resources needed to mitigate them, and the nature, scale and location of the regulated activity. The NT EPA considers that the environmental impacts and risks will be reduced to a level that is ALARP and acceptable, considering the sensitivity of the local environment, relevant standards and compliance with the Code.

4. Summary of monitoring and inspections

Table 2 provides a summary of the monitoring and inspections committed to in the EMP. These programs are used by the interest holder to meet prescribed requirements and to confirm the effectiveness of the mitigations committed to. To remove some uncertainty on the EMP, it is recommended a condition be set to provide an amended and consolidated monitoring and inspection plan for the activity.

Table 2: Monitoring and inspections relevant to the scope of the regulated activity

Aspect	Monitoring and Inspections
General	<ul style="list-style-type: none"> Weekly site inspections including dust, noise, sacred sites and cultural heritage sensitive areas, vehicle speed limits, access ways, stakeholder complaints, fauna encounters
Weeds	<ul style="list-style-type: none"> All plant and machine operators conduct routine checks for weeds along each seismic line All vehicles, plant, and equipment to be checked and cleaned prior to mobilization and on demobilisation Annual weed survey of seismic lines and access tracks at the end of the wet season
Groundwater	<ul style="list-style-type: none"> Weekly recording of groundwater take using an approved flow meter
Flora and Fauna	<ul style="list-style-type: none"> Weekly inspection of temporary camp area for pest species Records of fauna encounters, injuries, or death as result of seismic survey on fauna register
Heritage	<ul style="list-style-type: none"> Physical inspections that known sites are flagged on primary spatial databases to avoid accidental impacts.
Greenhouse gas emissions	<ul style="list-style-type: none"> Provide annual emissions report to DEPWS which summarises actual annual greenhouse gas emissions versus predicted emissions in the EMP using methods consistent those specified under the <i>National Greenhouse and Energy Reporting (Measurement) Determination 2008</i>
Erosion and Sediment Controls	<ul style="list-style-type: none"> Monitoring erosion and sediment control and condition during use, weekly and after > 25 mm rain in a 24 hour period, visual inspection and monitoring of existing tracks, seismic lines and waterway crossings condition for erosion Monitoring erosion and sediment control during seismic line preparation and acquisition, access track development, as soon as reasonably practicable after receiving significant rainfall events (>10mm in 24 hours) Monitoring erosion and sediment control throughout the rehabilitation period and at completion of rehabilitation works Ongoing monitoring of erosion and sediment control and condition at monitoring points that the EMP commits to establishing at creek and drainage crossings, prior to, during and at completion of rehabilitation
Air quality and emissions	<ul style="list-style-type: none"> Daily visual monitoring of dust
Waste, hazardous chemicals and fuels	<ul style="list-style-type: none"> Fortnightly inspections of waste storage areas (or twice weekly during wet weather) Daily inspections of fuel and chemical storage areas, including containment areas and structures, containers and spill kits

	<ul style="list-style-type: none"> Weekly inspections of all secondary containment when in use (or daily if operated in the wet season)
Weather	<ul style="list-style-type: none"> Daily weather monitoring, including the 7-day BOM forecast to inform seismic works
Bushfire	<ul style="list-style-type: none"> Daily monitoring for bushfire alerts Regular monitoring of NAFI and onsite visual assessment of worksites e.g. unusual smoke plumes Annual fire mapping to monitor changes to fire frequency in the relevant area
Rehabilitation	<ul style="list-style-type: none"> Photo-monitoring at regular intervals along the 2D seismic lines Inspection of rehabilitated areas six to nine months post-rehabilitation works Annual monitoring of rehabilitation until rehabilitation criteria have been met and signed off

5. Considerations under the *Environment Protection Act 2019*

In accordance with section 53(1) of the *Environment Protection Act 2019* (NT) (EP Act), the NT EPA may provide a written notice to the proponent requesting the proponent refer the action, if it is believed on reasonable grounds that a proponent is taking an action that should be referred to the NT EPA for assessment. Section 42(b) of the EP Act provides for actions to be subject to an environmental impact assessment process in order to ensure all actions that may have a significant impact on the environment are assessed.

The NT EPA has considered the proposed regulated activity in accordance with the purpose of environmental impact assessment as defined in section 42, and has determined:

- a) the action is unlikely to have an unacceptable impact on the environment, now or in the future
- b) the action is unlikely to create a significant impact to the environment, as defined in section 11 of the EP Act
- c) the EMP demonstrates the proponent has adopted alternative approaches and methodologies to minimise environmental damage
- d) the views of stakeholders have been taken into consideration
- e) the EMP includes actions to restore environmental quality through rehabilitation to the extent practicable.

Further, in accordance with requirements of section 26(1) of the EP Act, the NT EPA considers that the EMP demonstrates the interest holder has planned the regulated activity to avoid adverse impacts on the environment and where this is not possible has identified management options to mitigate adverse impacts on the environment to the greatest extent practicable.

On this basis, the NT EPA has elected to not require the proponent refer the action.

6. Other relevant matters

The EMP estimates the regulated activity will be conducted over an 80 day period between October 2023 and September 2024. The NT EPA recommends an approval condition is set by the Minister to provide certainty on the timing of the activity through provision of an updated timetable prior to commencement and updated quarterly or as other constraints, such as seasonal weather forecasts or travel restrictions emerge, as well as provision of progress updates at regular intervals.

CONCLUSION

The NT EPA considers that, subject to the consideration of the recommended EMP approval conditions, the EMP:

- is appropriate for the nature and scale of the regulated activity

- demonstrates that the regulated activity can be carried out in a manner that potential environmental impacts and environmental risks of the activity will be reduced to a level that is as low as reasonably practicable and acceptable.

In providing this advice the NT EPA has considered the principles of ecologically sustainable development.

RECOMMENDATIONS

The NT EPA recommends that should the EMP for BR Simpson Pty Ltd be approved (BRS1-5), the Minister considers approval conditions to achieve the following outcomes:

1. certainty of the timing of the regulated activity through provision of an updated timetable prior to commencement, weekly activity reports during conduct of the civil works, seismic data acquisition and concurrent progressive rehabilitation, and quarterly timetable updates thereafter;
2. certainty as to the extent and location of clearing through provision of spatial data for areas cleared;
3. certainty as to the interest holder's compliance with the approved EMP through submission of an annual performance report and a rehabilitation progress report to DEPWS to demonstrate the interest holder has met environmental outcomes and complied with the requirements set out in the Regulations, the Code, the Ministerial conditions and the EMP;
4. certainty as to the extent of greenhouse gas emissions through provision of an annual emissions report to DEPWS that summarises greenhouse gas emissions reported under the Australian Government's *National Greenhouse and Energy Reporting Act 2007* versus the predicted emissions in the EMP;
5. certainty that the subject land is free from contamination and can meet rehabilitation requirements through recording of all spills in an internal register that includes location, source and volume of the spill and corrective actions; and
6. clarity on planned monitoring and inspections through provision of a revised inspection and monitoring plan for the regulated activity.



PAUL VOGEL AM
CHAIRMAN

NORTHERN TERRITORY ENVIRONMENT PROTECTION AUTHORITY

25 SEPTEMBER 2023