



Annual Environmental Performance Report

Mereenie Field Workover and Wellhead Equipment,
Safety Systems and Gathering Line Activities
Environmental Management Plan (CTP4-3)

December 2021

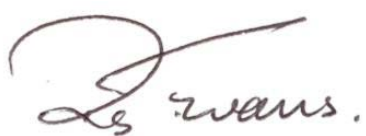
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1	24 December 2021	Cameron Lambert	Annual submission

Signature and Certification

We hereby declare that the information provided in this annual environment performance report and accompanying documents is to the best of our knowledge, true and correct.	
Signature	
Name	Ross Evans
Position	Ross Evans – Chief Operating Officer
Date	24 December 2021

Glossary

Abbreviation / Acronyms	Definition
AAPA	Aboriginal Areas Protection Authority
AEPR	Annual Environment Performance Report
CLC	Central Land Council
CoP	Code of Practice
CP	Central Petroleum Limited
CTP	Central Treatment Plant
CLC	Central Land Council
DEPWS	Department of Environment, Parks and Water Security
DITT	Department Industry, Tourism and Trade
EM	East Mereenie
EMP	Environmental Management Plan
EPA	Environment Protection Authority
EPS	Environmental Performance Standard
ESS	Eastern Satellite Station
EMP	Field Environment Management Plan
GIS	Geographic Information System
HSE	Health, Safety and Environment
MOGF	Mereenie Oil and Gas Field
MRN	Mereenie
NEMP	National Environment Management Plan
NORMS	Naturally Occurring Radioactive Materials
NPI	National Pollution Inventory
NT	Northern Territory
L6	Operating Licence Six
L7	Operating Licence Seven
PL2	Pipeline Licence Two
TO	Traditional Owner
WM	West Mereenie

Note: throughout the document references to the:

- Department of Environment and Natural Resources (DENR) have been replaced with the Department of Environment, Parks and Water Security (DEPWS)
- Department of Primary Industries and Resources (DPIR) have been replaced with the Department of Industry, Trade and Tourism (DITT)

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1.0 Introduction

This Annual Environment Performance Report (AEPR), as required under the *Petroleum (Environment) Regulations 2016* (NT), is presented to demonstrate the environmental performance of Central Petroleum (CP) as the operator of the Mereenie Oil and Gas Field in respect of achieving the environmental outcomes and performance standards, and monitoring, recording and reporting requirements.

The report includes sufficient information to allow the Minister to assess CP's compliance with the obligations described within the Mereenie Field Workover and Wellhead Equipment, Safety Systems and Gathering Line Activities Environment Management Plan (EMP CTP4-3) approved on 6 October 2020 and any other law in force in the Northern Territory related to conduct of the regulated activity.

The AEPR covers the period from 6 October 2020 to 5 October 2021, being the first 12-month period subsequent to the approval date for the EMP listed above. Notification of activity commencement under the Mereenie Field Workover EMP occurred on 19 February 2021. Delays in equipment mobilisation meant that workover activities did not commence until April 2021.

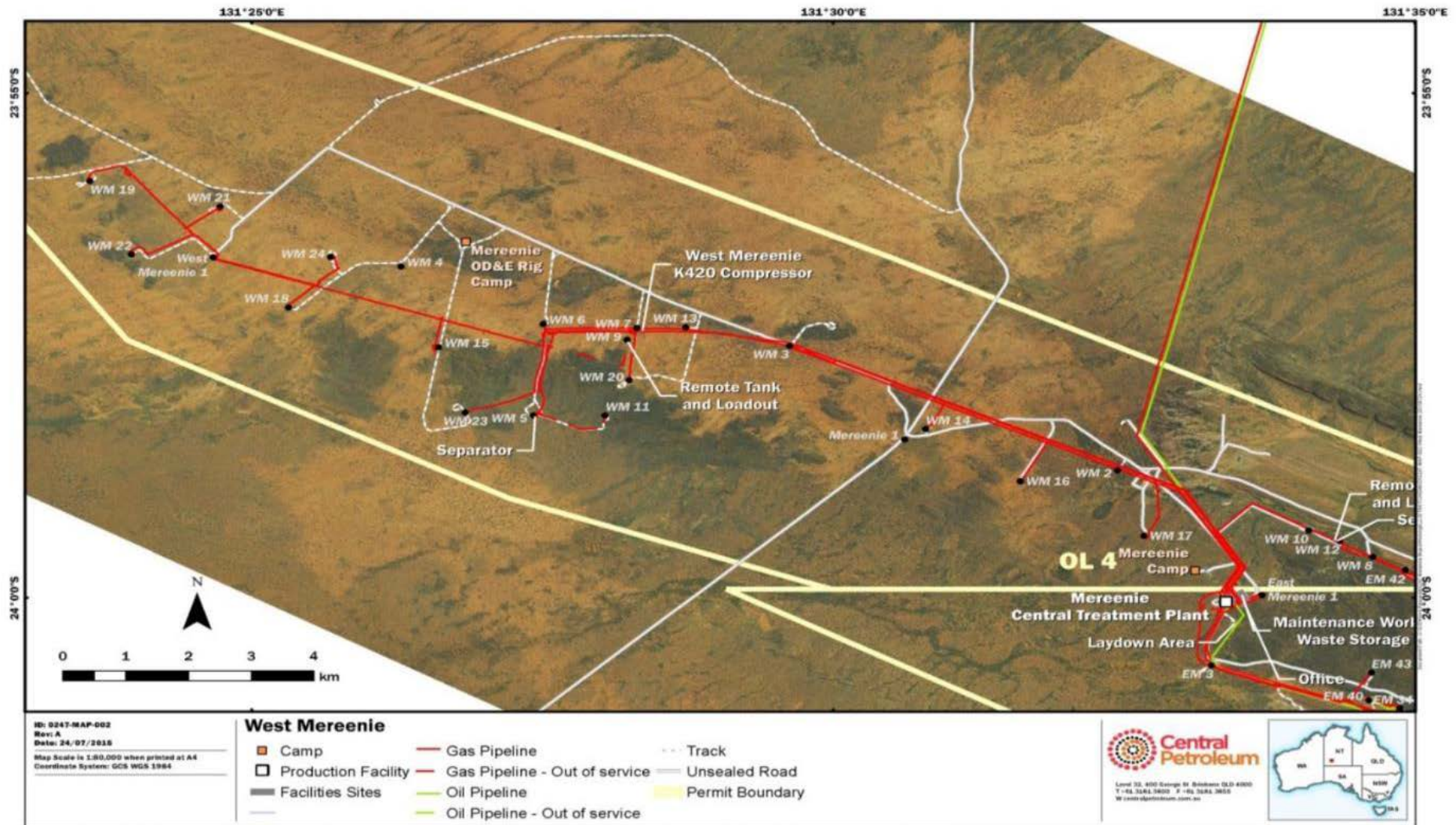
1.1 Background

The regulated activities conducted under the EMP that have been assessed against performance are as follows:

- Workover and well intervention activities at existing oil and gas wells
- Site set-up and de-mobilisation for workover activities at existing oil and gas wells
- Replacement/installation of wellhead equipment, safety systems and gathering lines at an existing oil and gas production well
- General activities:
 - Use of areas within the existing disturbance footprint only including existing roads, access tracks, laydown areas, well lease pads
 - Personnel to use the existing Mereenie Camp
 - Use of a mixture of commercially supplied and existing groundwater bores for water requirements
 - Management of Naturally Occurring Radioactive Materials (NORMs) as per the CP NORMs (Radiation) Management Plan and the Code
 - Ongoing production operation and maintenance, decommissioning and final rehabilitation of the wells to occur under the Mereenie Oil and Gas Field Environmental Management Plan 2017 upon completion of the works
- Activities that are not part of the workover and wellhead equipment, safety systems and gathering line activities:
 - Drilling
 - Hydraulic fracturing/stimulation
 - Planned venting
 - Native vegetation clearing and use of areas outside the existing disturbance footprint

The location of the Mereenie Oil and Gas Field (the area of interest) is shown in Figure 1-1.

Figure 1-1 Mereenie Oil and Gas Field Layout (OL4)



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1.2 Contents of Performance Report

This AEPR describes the environmental performance of CP by evaluating the following:

1. Compliance with Ministerial approval conditions
2. Compliance with each environmental outcome and performance standard within the approved EMP
3. Compliance with reporting requirements in accordance with regulations
4. All recordable and reportable incidents, including root cause analysis and related corrective actions to prevent re-occurrence
5. Findings of all regulatory inspections and audits and related actions to address any findings

1.3 Assessment of Compliance

Table 1-1 shows the compliance status indicators used in the AEPR.

Table 1.1 Compliance Descriptors

Indicator	Description
Compliant	Compliant with requirement for entire 12-month reporting period
Partially Compliant	Compliant with requirement for most of year, short periods of non-compliance
Not Compliant	Interest holder did not comply with the requirement during the reporting period
Not Applicable	Requirement not applicable during the reporting period

1.4 Evidence of Compliance

The following sources of evidence are used to demonstrate compliance:

1. Internal tracking of compliance by CP through:
 - Inspections, as committed to in the EMP
 - Our incident management system records
 - Quarterly environmental inspections
 - March, June, September 2021
 - Area and lease inspection reports
 - Work management and maintenance system records
 - Daily production reports
 - Various registers in place including:
 - animal control, waste, hazardous goods, chemical, weed control
2. Reports provided under the *National Greenhouse and Energy Reporting Act 2007*
3. Outcome from regulatory inspections conducted by the Department of Environment, Parks and Water Security (DEPWS), Petroleum Operations
4. Recordable and reportable incident reports submitted to DEPWS Petroleum Operations
5. Reports provided to DITT, the Department of Industry, Trade and Tourism (DITT) and other government agencies.

2.0 Demonstration of Compliance

2.1 Ministerial Approval Conditions

The EMP was approved by the Minister for Environment and Natural Resources on 06 October 2020 with conditions, which are assessed for compliance in Table 2-1.

Table 2.1 Compliance with Ministerial EMP Approval Conditions

No	Ministerial Condition	Compliance Status	Evidence
1	The interest holder must submit to the Department of Environment, Parks and Water Security (DEPWS) an updated timetable for the regulated activity prior to the commencement of the activity and provide an updated timetable to DEPWS each quarter following commencement. The timetable must include dates for the conduct of the activity and implementation of time-bound commitments.	Compliant	<p>Quarterly reports of regulated activities undertaken in the previous quarter as well as forecast over the coming quarter were developed and submitted. Reports were provided to DEPWS for the following quarters:</p> <ul style="list-style-type: none"> ▪ October 2020 to January 2021 ▪ January to March 2021 ▪ April to June 2021 ▪ July to September 2021
2	The interest holder must provide an annual report to DEPWS on its environmental performance, in accordance with item 11(1)(b) in schedule 1 of the <i>Petroleum (Environment) Regulations 2016</i> (NT). The first report must cover the 12-month period from the date of this approval and be provided within three calendar months of the end of the reporting period. The annual environment performance report must align with the template prepared by DEPWS for this purpose and must include a signed declaration by the interest holder or operator.	Complaint	This document is the first annual report submitted under the approved Workover EMP and covers the period 6 October 2020 to 5 October 2021.
3	The interest holder must submit to DEPWS within one month of this approval a groundwater monitoring plan that includes all five groundwater wells currently being monitored in the Mereenie Field, to demonstrate there is no change in groundwater quality as a result of activities in the Mereenie Field. The groundwater monitoring plan should be consistent with the sampling method and data management sections of the Preliminary Guideline:	Complaint	<p>A site-specific Groundwater Management Plan for the Mereenie Field was developed and submitted to DEPWS. The final plan included:</p> <ul style="list-style-type: none"> ▪ location map of the monitoring bores relative to the respective field ▪ a commitment to commence and undertake groundwater monitoring ▪ monitoring in accordance with the CoP ▪ a commitment to develop site-specific performance standards for groundwater quality once baseline water quality data was determined.

No	Ministerial Condition	Compliance Status	Evidence
	<p>Groundwater Monitoring Bores for Exploration Petroleum Wells in the Beetaloo Sub-basin and is to include:</p> <ul style="list-style-type: none"> i. monitoring of all five groundwater bores currently being monitored under the approved Mereenie Field EMP; ii. monitoring twice per year, within one month of the end of each of the dry season and the wet season, with the wet season period defined in the Code of Practice; iii. a location map (and associated spatial files) showing each of the five monitoring bores relative to the Mereenie Field; iv. continuation of the monitoring program while the EMP remains in force. 		<ul style="list-style-type: none"> ▪ a commitment to provide groundwater monitoring reports and data to DEPWS annually.

2.2 Environmental Outcomes and Environmental Performance Standards

Table 2-2 provides a systematic overview of CP’s compliance with the environmental outcomes and environmental performance standards within the approved EMP. The environmental outcomes for the EMP (as listed in Table 2-2 below) are sourced from the environmental performance standards sourced from ‘environmental outcomes’ in Tables 8-1 to 8-6 of the EMP.

Table 2.2 Compliance with Environmental Outcomes and Environmental Performance Standards

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
1	All CP’s activities minimise impacts on conservation significant fauna and flora	Driving will only to occur on designated roads, access tracks and well pads.	Compliant	Incident management system did not identify any instances of driving outside of designated areas during the reporting period.
		Vehicle speed will be limited on access tracks within the MRN to 70km/hr.	Complaint	Incident management system did not identify any instances of vehicles speeding. Speed limits are posted and included in site traffic management plans.
		All personnel attending the MRN for the workover and wellhead equipment, safety systems and gathering line works will be inducted on speed limits and times to avoid driving.	Complaint	Site induction records identified that all employees and contractors were inducted prior to or upon arrival at site. Incident management system records did not identify any employees and contractors who were not inducted. Induction materials outline speed limits and times to avoid driving to minimise potential for harm to fauna.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		All vehicles, equipment and machinery from known weed infested areas will be cleaned and inspected for weeds prior to attending the MRN for the workover and wellhead equipment, safety systems and gathering line works.	Not Applicable	No equipment was mobilised to sites from known weed infested areas, therefore the Environmental Performance Standard (EPS) was not triggered.
		Weeds identified on the environmental sensitivity maps as occurring on the well lease will be site-verified and managed prior to rig mobilisation.	Compliant	Each well site was graded, and weeds removed as part of civil works prior to commencement of workover activities.
		Weed Management Plan will be implemented including the use of the dedicated Weeds Officer to assist in weed identification, management and control.	Compliant	Monitoring was conducted in August 2021 and a report was developed and submitted to DEPWS.
		All personnel attending the MRN for the workover and wellhead equipment, safety systems and gathering line works will be inducted on the weed management requirements as per this EMP.	Compliant	Training and induction records identified that all employees and contractors were inducted prior to or upon arrival at site in the requirements of weed management and control. Incident management system records did not identify any records of non-conformance.
		The well and flare pits will be fenced for the duration of the activities.	Partially Compliant	Wells and flare pits were not always fenced during the activities, to maintain sufficient safe access for operations during workover activities. No incidents of fauna injury or death were recorded during the reporting period for the regulated activities.
		Waste containers will be fauna and vermin proof.	Compliant	Daily environmental inspections of waste containers were conducted. No records of fauna or vermin impact were recorded.
		Wastes will be removed from site by an approved person and disposed at an approved facility.	Compliant	Waste removed from the site was recorded in a waste register which includes the date of removal, type of waste, whether it is listed, volume of waste, who removed it and its destination. There were no instances identified of listed waste being disposed not accordance with the NT EPA requirements.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
2	CP's activities: <ul style="list-style-type: none"> ▪ Avoid, minimise and control soil erosion / sedimentation ▪ Maintain the viability of soil through preventing contamination 	Erosion and Sediment Control Plan will be implemented.	Compliant	Area and environmental inspection records confirmed that erosion and sedimentation control devices were in place and compliant with DEPWS and IECA best practice guidelines. Incident management system records did not identify any erosion or sediment incidents at the well locations.
		Spill Management Plan will be implemented.	Compliant	Incident Management System did not identify any spills. Minor leaks were captured using spill trays and all chemicals and fuels were held within secondary containment.
		Rehabilitation Management Plan implemented.	Not Applicable	At completion of the regulated activities, the wells were handed back to Mereenie Field operations and continue to be managed under the Mereenie FEMP. The wells are classified as operational areas, as such no further rehabilitation activities have been conducted.
		Wet Season Management Plan will be implemented.	Not Applicable	Regulated activities were not conducted during the wet season. Rig mobilisation was delayed until mid-April 2021.
		Driving on access tracks will be avoided for 24 hours following significant rainfall events (i.e. >10mm in 24 hours).	Compliant	Daily toolbox meeting and inspection records across the reporting period captured rain events and instructions to all personnel regarding driving conditions and roads and tracks to avoid. No rain event >10mm was recorded whilst activities were being completed.
		Site inspections to be undertaken daily and within 5 business days of a significant rainfall event to assess erosion / sedimentation issues.	Compliant	Daily environmental inspections did not identify significant rainfall events or subsequent erosion / sedimentation issues.
		Job Hazard Analysis will be conducted for any new task or new use of equipment to ensure appropriate control measures are identified.	Compliant	Daily Workover Reports and Permit to Work records identified that all new tasks were supported by a job hazard analysis. The analysis includes details of the hazards identified and the controls to be implemented to perform the job safely.
		Driving only to occur on designated roads, access tracks and well pads.	Compliant	Incident management system did not identify any instances of driving outside of designated areas during the reporting period.
		Portable spill containment equipment (e.g. spill trays) to be available at each of the well sites.	Compliant	Daily environmental inspections confirmed that spill containment equipment (e.g. spill trays) were available at each site.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Minimal volumes of fuels, oils and other chemicals to be stored at the well site.	Compliant	Daily environmental inspections confirmed that only minimal volumes of fuels, oils and other chemicals were being stored.
		Daily inspections to be undertaken of well site and equipment for leaks/spills. Where leaks and spills are identified, corrective actions are raised, and repairs are undertaken in a timeframe commensurate with the risk of environmental harm escalating if not repaired.	Compliant	Daily environmental inspections were undertaken at each well site to check equipment for leaks and spills. Temporary spill trays and bunding were used to capture potential leaks.
		Implement fuel and chemical handling and storage procedure.	Compliant	Daily environmental inspections confirmed that only minimal volumes of fuels and other chemicals were being stored appropriately and procedures were being implemented
		Risk assessment of road conditions for heavy vehicle transport will be conducted prior to mobilisation on unsealed roads using detailed weather forecasting.	Compliant	A risk assessment was conducted with heavy vehicle operators and Central Petroleum prior to mobilisation of heavy vehicles. Daily review as part of pre-start on suitability for transport of heavy vehicles on roads and access tracks
		Provide spill response kits appropriate for the types of spills possible at each well site.	Compliant	Daily environmental inspections confirmed that spill containment equipment (e.g. spill trays/spill kits) were available at each active workover site.
		Follow the appropriate Australian Standards and Code of Practice for the fuel / chemical being stored and used.	Compliant	Daily environmental inspections confirmed that all chemical and hazardous substances stored on site were in accordance with Australian standards and guidance provided in safety data sheets.
		On-site SDS and handling procedures for fuel / chemicals will be available at the fuel/chemical storage area.	Compliant	Daily environmental inspections confirmed that all chemical and hazardous substances stored on site had safety data sheet available.
		Liquid wastes stored in secured containers, with waste storage area bunded.	Complaint	Daily environmental identified liquid wastes stored in secured bunded areas.
		All personnel attending the MRN for the workover and wellhead equipment, safety systems and gathering line works will be inducted on speed limits, times to avoid	Compliant	Site induction records identified that all employees and contractors were inducted prior to or upon arrival at site on land management including waste procedures and erosion and sediment control. Incident management system records did not identify any employees and contractors who were not inducted.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		driving, correct waste storage, segregation and disposal.		
		Removal of listed wastes for off-site disposal to be via an NT EPA approved contractor.	Compliant	Waste removed from the site was recorded in a waste register which includes the date of removal, type of waste, whether it is listed, volume of waste, who removed it and its destination. There were no instances identified of listed waste being disposed not accordance with the NT EPA requirements.
3	CP's activities avoid impacts to surface water and groundwater	Erosion and Sediment Control Plan will be implemented.	Compliant	Records confirmed that erosion and sedimentation control devices were in place and no corrective actions were required.
		Site inspections to be undertaken within 5 business days of a significant rainfall event to assess erosion / sedimentation issues.	Compliant	Records did not identify significant rainfall events or subsequent erosion / sedimentation issues.
		Wastewater Management Plan will be implemented.	Compliant	Wastewater generation (workover fluid and hydrostatic test water) was monitored through daily workover reports. Wastewater was sent to the Mereenie CTP via gathering pipelines for disposal via existing onsite evaporation ponds.
		Spill Management Plan will be implemented.	Compliant	Incident Management System did not identify any spills. Minor leaks were captured using spill trays and all chemicals and fuels were held within secondary containment.
		Wet Season Management Plan will be implemented.	Not Applicable	Regulated activities were not conducted during the wet season. Rig mobilisation was delayed until April 2021. Works commenced in late April 2021.
		Conduct Job Hazard Analysis for any new task or new use of equipment to ensure appropriate control measures are identified.	Compliant	Maintenance and permit to work records identified that all new tasks were supported by a job hazard analysis that includes details of the controls to be implemented to perform the job safely.
		Bunding will be provided to the chemical storage area, portable storage area and diesel tank in accordance with the secondary containment requirements of the Code.	Compliant	Records indicate that secondary containment was present at all chemical and fuel storage areas during workover activities.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Inspections will be undertaken of wellhead and equipment for leaks/spills. Where leaks and spills are identified, corrective actions are raised, and repairs are undertaken in a timeframe commensurate with the risk of environmental harm escalating if not repaired.	Compliant	Well integrity was reviewed under the Mereenie Integrity Management System. At the completion of workover activities, each well was transferred back to control of the Field Operations team under the Mereenie FEMP. No leaks or spills were identified on any of the workover wells.
		Wastes storage area will be bunded and liquid wastes will be storage in secured containers.	Compliant	Records did not identify any waste being stored in unsecured containers or non-bunded areas.
		Waste storage area will not be located in a flood prone area.	Compliant	Records indicated that waste storage areas were not located in areas prone to flooding.
		Spill response kits will be provided at each wellsite appropriate for the types of spills.	Compliant	Records confirmed that spill response kits were available at each site.
		Minimal volumes of fuels, oils and other chemicals will be stored on the job site.	Compliant	Records confirm that all chemical and hazardous substances stored on site were in accordance with Australian standards and guidance provided in safety data sheets.
		Workover activities conducted in accordance with Code compliant and accepted WIMP and WOMP.	Compliant	Workover activities were conducted in accordance with DITT approved management plans. Following workover activities the wells were transferred back to Mereenie Field operation and were monitored in real time through the production management system and through regular lease reviews.
		No overtopping of the onsite tanks.	Compliant	Daily Environmental Inspection records and Incident Management System records did not identify an instance of overtopping of onsite tanks.
		Groundwater extraction licence will be in place prior to groundwater extraction for workover activities.	Compliant	A groundwater extraction licence was approved in January 2021 and was in place for the Mereenie field prior to workover activities.
		Annual groundwater monitoring program will be implemented.	Compliant	Groundwater monitoring was conducted in May 2021 in accordance with the Groundwater Monitoring Plan.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Groundwater monitoring program results show no significant impact to groundwater resources from workover activities.	Compliant	Results from May 2021 did not identify potential impact to groundwater resources.
4	CP's activities do not create a measurable decrease in air quality at sensitive receptors through: <ul style="list-style-type: none"> ▪ Dust generation ▪ Emissions (gas leaks) ▪ Combustion 	All diesel used on site will be compliant with the Federal Government's Fuel Quality Standards (Automotive Diesel) Determination 2019.	Compliant	All diesel used on site is supplied in accordance with fuel quality standards from a third-party supplier.
		Dust control measures, including the use of water trucks, will be where there is evidence of unacceptable dust generation and / or a dust complaint related to the EMP activities.	Compliant	Records indicate dust suppression was implemented where required through water spraying.
		Vegetation in no-use area to be left undisturbed.	Compliant	No activities were undertaken outside of disturbed areas, hence vegetation was left undisturbed.
		Speed limited on access tracks to 70km/hr.	Compliant	Records did not identify any instances of vehicles speeding. Speed limits are posted and included in site traffic management plans.
		Use of non-intrinsically safe material only allowed inside the facilities if accompanied by a gas detector and the appropriate permit.	Compliant	Daily Workover Reports and Permit to Work records identified that all tasks requiring the use of non-intrinsically safe material were support by a Permit to Work.
		Well to be managed in accordance with Code compliant and accepted Well Integrity Management Plan and Well Operation Management Plan.	Compliant	Wells are managed in accordance with DITT approved management plans. Following workover activities the wells were transferred back to Mereenie Field operation and were monitored in real time through the production management system and through regular lease reviews.
		Weekly inspections to be undertaken of wellhead and equipment for leaks / spills. Where leaks and spills are identified, corrective actions are raised, and repairs are undertaken in a timeframe commensurate with the risk of environmental harm escalating if not repaired.	Compliant	Well integrity was reviewed under the Mereenie Integrity Management System. At the completion of workover activities, each well was transferred back to control of the Field Operations team under the Mereenie FEMP. No leaks or spills were identified on any of the workover wells.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Only diesel is to be stored onsite.	Compliant	Daily environmental inspections confirmed that only diesel fuel was being stored onsite. Incident Management System did not identify any instances of other fuels being present.
		Methane Emissions Management Plan will be implemented.	Compliant	Daily Workover Report and Daily Production Report captured flaring and venting and captured in emissions reporting under National Greenhouse and Energy Reporting Scheme reporting. Venting and flaring is also captured in Monthly Reports supplied to DITT.
		Bushfire Management Plan will be implemented.	Compliant	Daily Environmental Inspections identified checks of bushfire potential and nearby bushfire activity.
		Smoking is only permitted in designated smoking areas.	Compliant	Incident management system records did not identify any instances of smoking outside of designated areas.
		Conduct Job Hazard Analysis for any new task or new use of equipment to ensure appropriate control measures are identified and to take account of variation in fire danger ratings.	Compliant	Daily Workover Reports and Permit to Work records identified that all new tasks were supported by a job hazard analysis. The analysis includes details of the controls to be implemented to perform the job safely.
		When attending a site a daily toolbox meeting will be conducted with on-site personnel regarding current fire danger, presence of fire in the area and current vegetation condition.	Compliant	Fire awareness and preparedness is covered as part of toolbox meetings and as part of the induction. Vegetation and bushfire condition is noted within daily environmental inspection records.
		Inductions to include information on the designated smoking areas, fire extinguisher locations and emergency response plan.	Compliant	A project specific induction was provided to personnel and contractors and provided information to support the emergency response plan, including fire safety and response.
		Fire extinguishers will be available in any vehicle which visits the MRN for the workover and wellhead equipment, safety systems and gathering line works.	Compliant	Fire extinguishers are standard safety equipment in all CP vehicles and are required in vehicles attending CP sites. Prestart checklists require fire extinguishers to be present and checked before each journey.
		Hazardous zones for each well determined in accordance with the relevant Australian Standard.	Compliant	Area / lease inspections records confirmed that all hazardous areas were clearly identified using signage and require specific conditions prior to entry. All hazardous areas are aligned with Australian standards.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Fire breaks will be installed and maintained.	Compliant	Each well site included as part of the Workover EMP during the reporting period maintained a firebreak as part of well workover preparation activities.
		Only equipment authorised within the hazardous zone is used whilst on site.	Compliant	Maintenance and permit to work records identified that work was authorised by a permit and a Job Hazard Analysis. The analysis included details of the controls to be implemented to perform the job safely in these cases it included the use of gas detectors.
7	<p>CP's activities minimise the following:</p> <ul style="list-style-type: none"> ▪ Reduction in capacity of road infrastructure up to and within the MRN ▪ Maintain and enhance community relationships ▪ Safety risks to the community 	<p>All personnel and site visitors to have appropriate CLC approval and complete the appropriate inductions.</p>	Complaint	A review of site access records confirmed all personnel attending site were included under the CP's CLC permit. Site induction records identified that all employees and contractors were inducted prior to or upon arrival at site in cultural heritage and community engagement. Incident management system records did not identify any employees and contractors who were not inducted.
		All activities will stay within the approved area.	Compliant	Incident Management System did not identify activities occurring beyond the approved work area.
		A full stakeholder consultation log will be maintained by CP.	Compliant	CP conducted engagement with stakeholders prior to and during the reporting period with the details and outcomes recorded in the stakeholder communications log.
		Early and ongoing community consultation and engagement approach will be maintained prior to and throughout the regulated activities.	Compliant	CP conducted regular engagement with stakeholders prior to and during the reporting period with the details and outcomes recorded in the stakeholder communications log.
		Local communities and stakeholders advised of CP contact number through multiple channels.	Complaint	CP contact details (phone, fax email) are available on our website. Also prior to any major works notices / flyers are provided to identified stakeholders.
		Where possible, local and / or indigenous people will be employed.	Compliant	CP continues to engage local and /or indigenous persons across its operations, including the Mereenie Workover program.
		Stakeholders will be consulted as per CP's agreement with the CLC.	Compliant	Stakeholder communications log records indicated CP's continued engagement with identified stakeholders. Meeting records did not identify any comments related to operations which needed to be assessed or corrective actions implemented.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Approved Traffic Management Plan in place.	Compliant	A program specific Traffic Management Plan was developed and implemented for the works program. In addition to the Mereenie Traffic Management Plan.
		Transportation of over-width or over-dimension loads under approved DIPL permit.	Compliant	Over-width loads were transported to site under an approved DIPL permit.
		No unauthorised third-party access to infrastructure.	Compliant	Incident management system records did not identify any instances of unauthorised access to site.
		Routine alcohol and/or drugs testing for anyone attending the sites.	Compliant	Random drug and alcohol testing was undertaken periodically during the reporting period. A review of incident management system and testing records did not identify any incidents or positive tests.
		Personnel are appropriately licensed to perform works.	Complaint	All CP personnel are appropriately licenced to perform works. CP pre-qualifies contractors who undertake work on site. All personnel are inducted prior to / or upon arrival at site.
		Journey management plan approved by CP.	Compliant	Journey management records for the period confirmed that all applicable journeys were planned and approved prior to commencement.
		Heavy vehicle loads will avoid regional centres.	Compliant	Stakeholder log did not record any complaints regarding heavy vehicle loads. Heavy vehicles used existing routes.
		Vehicle speeds will be reduced if activities are causing significant dust on NT controlled roads.	Compliant	Stakeholder log did not record any complaints regarding vehicles causing dust on NT controlled roads.
		Wet Season Management Plan will be implemented.	Not Applicable	Regulated activities were not conducted during the wet season. Works commenced at end April 2021.

2.3 Mandatory Reporting Requirements

Table 2-3 demonstrates CP's compliance with the reporting requirements under the *Petroleum (Environment) Regulations 2016* (NT) Schedule 1, item 11(2), which requires all information required to be recorded, monitored, or reported, to be provided. Where relevant, CP also confirms that all records, monitoring or required reporting under the *Petroleum (Environment) Regulations 2016* (NT) has been provided to DEPWS or the relevant NTG agency except for the elements highlighted in Table 2-3.

Table 2.3 Compliance with Mandatory Reporting Requirements

No	Reference	Requirement	Compliance Status	Evidence
1	Code cl A.3.5	Geospatial information depicting areas cleared is to be provided to the Minister.	Not Applicable	No areas were cleared during the reporting period.
2	Code cl A.3.6 (b)	Weed management plan developed as part of the EMP must provide for ongoing weed monitoring.	Compliant	The Weed Management Plan was implemented, and monitoring was conducted during the reporting period. The weed management survey conducted August 2021
3	Code cl A.3.7(a)vi	The fire management plan developed as part of the EMP must provide for annual fire mapping to monitor changes to fire frequency in the relevant areas.	Compliant	The Fire Management Plan includes annual review of the fire mapping. The review was undertaken the risk was reviewed. The risks and mitigations, environmental outcomes and environmental performance standards in the EMP remain appropriate.
4	Code cl A.3.9(c) Code cl A.3.9(e)	The rehabilitation plan developed as part of the EMP 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.	Not Applicable	No areas were cleared as part of these activities, therefore no remediation was practicable.
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 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.	Not Applicable	No hydraulic fracture stimulation and flowback operations conducted.

No	Reference	Requirement	Compliance Status	Evidence
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.	Not Applicable	No venting conducted as part of regulated activities.
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.	Compliant	Well completion reports were submitted to DITT for review and approval. Wells were approved for transition for operation/production.
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.	Not Applicable	No decommissioning of wells in reporting period.
9	Code cl B.4.17.2(d)	Any guidelines published by the Northern Territory Government from time to time relating to reporting and data submission, and groundwater monitoring data standards must be followed.	Compliant	A Groundwater Management Plan covering activities in the Amadeus Basin was submitted to DEPWS in February 2021 prior to workover activities commencing. The plan was developed in alignment with the principles of the Preliminary Guideline: Groundwater monitoring bores for exploration petroleum wells in the Betaloo Sub-basin where suitable.
10	Code cl C.3(e)	The components of the wastewater management framework, include: Monitor, manage and report in accordance with the Wastewater Management Plan and Spill Management Plan.	Compliant	Wastewater Management Plan and Spill Management Plan have been presented within the EMP.
11	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	Compliant	All wastewater generated on site was transferred via flowlines to the Central Treatment Plant and managed in accordance with the Mereenie Field Environmental Management Plan. Groundwater was extracted as part of the wider Mereenie Field groundwater extraction licence. Quality and quantity records have been recorded as part of the May 2021 data supplied to DEPWS. Wastewater generation has been tracked in the Daily Drilling Reports.

No	Reference	Requirement	Compliance Status	Evidence
12	Code cl C.7.1(d)ii	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.	Compliant	Daily Environmental Inspections monitored for interactions with wastewater. No spills nor evidence of fauna injury or death recorded.
13	Code cl D.4.3.2(f)	A written report detailing the levels of methane measured, the duration of the unusual readings and the results of the investigation must be submitted within one month of the significantly higher-level methane event being detected.	Not Applicable	Not applicable to CP workover activities.
14	Code cl D.5.9.2(c)	Emissions from exploration, well construction (including during flowback) and workovers must be measured, and reports submitted.	Compliant	Reporting of greenhouse gas emissions was made to the Clean Energy Regulator in accordance with the National Greenhouse and Energy Reporting Act 2007.
15	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.	Not Applicable	No venting of flaring occurred at a gas processing or downstream facility.
16	Code cl D.6.1	All mandated government reporting is complied with; and all detectable leaks and emissions are reported on an annual basis.	Compliant	Reporting of greenhouse gas emissions was made to the Clean Energy Regulator in accordance with the National Greenhouse and Energy Reporting Act 2007.
17	Code cl D.6.2(a)	Reports of baseline assessments must be submitted at the conclusion of each field campaign.	Not Applicable	No pre-exploration or pre-operation baseline assessments were conducted as wells were in production prior to workover activities.
18	Code cl D.6.2(b)	Emissions reporting must be in accordance with Section D.5.6. Emissions associated with venting and flaring as described in Section D.5.9 must be provided separately to the Northern Territory Government in accordance with this Code.	Compliant	Reporting of venting and flaring emissions was made to the Clean Energy Regulator in accordance with the National Greenhouse and Energy Reporting Act 2007.

No	Reference	Requirement	Compliance Status	Evidence
19	PER Reg 14	A current EMP remains in force until the interest holder notifies the Minister the activity is no longer being carried out and all of the environmental outcomes and obligations under the plan have been met, and the Minister advises the interest holder the notice is accepted, and the plan ceases to be in force.	Not Applicable	EMP is currently in force. No notification has been made to the Minister that the activity is no longer being carried out.
20	PER Reg 37A	A report about flowback fluid from hydraulic fracturing must be provided to the Minister within 6 months of the flowback occurring.	Not Applicable	The regulated activity did not include hydraulic fracturing.
21	PER Reg 37B	A report about produced water from hydraulic fracturing must be provided to the Minister within 6 months of the produced water being extracted.	Not Applicable	The regulated activity did not include hydraulic fracturing.
22	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, drilling, or seismic surveys.	Compliant	Notification was made on 16 February 2021 for commencement of rig mobilisation on 19 February 2021. Work was subsequently delayed and did not commence until April 2021.
23	PER Reg 33	DEPWS is 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.	Not Applicable	CP did not have any reportable incidents resulting from activities outlined in the EMP.
24	PER Reg 34	Reports on reportable incidents are to 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/clean-up of the affected area.	Not Applicable	CP did not have any reportable incidents resulting from activities outlined in the EMP.

No	Reference	Requirement	Compliance Status	Evidence
25	PER 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.	Compliant	All recordable incidents reports were submitted as required for the approved EMP from commencement of approval as follows: <ul style="list-style-type: none"> October 2020 to January 2021 January to March 2021 April to June 2021 July to September 2021
26	Schedule 1, item 11(2)	Environmental report to be submitted to DITT / DEPWS annually	Compliant	This document represents the first Annual Environmental Performance Report for the Mereenie Workover EMP.
27	NPI Measure 1998 (Cth) s 9 / Waste Management and Pollution Control Act 2003 (NT)	The occupier of each reporting facility is to be required to provide information to the NPI if a reporting threshold for a substance is exceeded	Compliant	A report was submitted in accordance with the requirements of the National Pollutant Inventory in September 2021 for the 2020/21 reporting period.
28	National Greenhouse and Energy Reporting Act 2007 s 19	A registered corporation must provide a report to the Greenhouse and Energy Data Officer relating to the greenhouse gas emissions, energy production and energy consumption from the operation of facilities under the operational control of the corporation and entities that are members of the corporation's group, during that financial year	Compliant	Reporting greenhouse gas emissions for the Mereenie Workover program in combination with other activities at Mereenie Field was undertaken in accordance with the National Greenhouse and Energy Reporting Act 2007 and was submitted to the Clean Energy Regulator in September 2021 for the FY21 NGERs reporting period.
29	PER Schedule 1 Item 9(2)	Interest holders are required to conduct future engagement with stakeholders, in accordance with the description in the EMP.	Compliant	CP conducted regular engagement with stakeholders during the reporting period with the details and outcomes recorded in the stakeholder communications log.

3.0 Summary of Compliance

3.1 Overview of Compliance

Table 3-1 provides a summary of the results of the compliance assessment against the 112 total compliance items.

Table 3.1 Compliance Summary

Compliance Indicator	Number	Percentage
Compliant	93	83%
Partially Compliant	1	1%
Non-Compliant	0	0%
Not Applicable	18	16%

3.2 Overview of Items Found Not Compliant or Partially Compliant

The following sections describe:

- 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 or partially 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.

3.2.1 Environmental Performance Standards

One partially compliant environmental performance standard was identified during the review of annual environmental performance

Description	Potential environmental harm or impact	Corrective actions
Fencing was not always installed around the wells during workover activities	No material environmental harm or impact. No incidents involving death or injury to fauna were recorded.	Review of fencing requirements for future workover activities and suitability of existing monitoring and reporting measures to capture impacts on fauna from workover activities.

3.2.2 Regulatory Reporting

There were no reporting requirements found to be non-compliant or partially compliant.

3.3 Application of Lessons Learned Across CP Onshore Interests

CP continues to refine processes and procedure to ensure compliance with the Code of Practice and the obligations of the EMP. Ongoing communication is occurring across the organisation to raise awareness of the requirements of the EMP and the environmental performance standards, particularly given this EMP was in its first year of implementation. Corrective actions continue to be implemented in response to events reported within the incident management system.