

# Quarterly Recordable Incident Report

This report is required to be submitted under regulation 35(1) of the Petroleum (Environment) Regulations 2016 (the Regulations) and may be published in accordance with regulation 35A(1)(c) of the Regulations. Send the completed form to [Onshoregas.DEPWS@nt.gov.au](mailto:Onshoregas.DEPWS@nt.gov.au) as soon as practicable and in any case no later than 15 days after the end of the reporting period, as referred to in the [Onshore Petroleum Incident Reporting Guideline](#), or as otherwise agreed in writing with the Minister for Environment, Climate Change and Water Security.

Section 1 – Interest Holder Details				
For petroleum titles held by multiple interest holders, details must be completed for each interest holder. If insufficient room, please attach information to the form.				
	Interest Holder 1	Interest Holder 2	Interest Holder 3	Interest Holder 4
<b>Company Name</b>	Imperial Oil & Gas Pty Ltd			
<b>Nominated interest holder for all matters related to Report?</b> <small>If 'no' each interest holder must sign Declaration and will receive related documents unless designated operator authorised to sign and receive documents</small>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Authorisation given to an Operator to submit Report and sign Declaration?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

Section 2 – Recordable Incident Report Details							
<b>EMP title (petroleum title/s)</b>	2021- 2025 EP 187 Work Program	<b>Unique EMP ID</b>	IMP4-3	<b>Date Submitted</b>	April 2024	<b>Nil report?</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Activity type</b>	Land clearing, earthworks, seismic surveys, drilling and hydraulic fracturing.	<b>Reporting Period<sup>1</sup></b>	Quarter: Q1	Year:	2024		

Note 1: Refer to Table 1 of the [Onshore Petroleum Incident Reporting Guideline](#) for reporting periods and due dates.

### Section 3 – Recordable Incident Details

Complete this section for **each recordable incident** within the reporting period, by copying the rows below and completing for each individual recordable incident.

<b>Incident number</b>	1.				
<b>Incident date</b>	19/02/2024	<b>Incident time</b>	pm	<b>Date and time interest holder became aware</b>	Morning of 20/02/2024
<b>Reg 35(3)(c)(ii): All material facts and circumstances</b> refer to Section 5.4.2 of the <a href="#">Onshore Petroleum Incident Reporting Guideline</a>	<b>Description:</b> A minimum of 1100mm freeboard was not achieved for wastewater storage at all times throughout the wet season at the Carpentaria 2/3 wellpad. Wastewater tank exceeded wet season minimum freeboard target level of 1100mm from 28/2/24 – current date. Cutting pit exceeded wet season minimum freeboard target level of 1100mm from 19/2/24- 25/2/24 and 18/3/24 – current date. Drilling sump exceeded wet season minimum freeboard target level of 1100mm from 27/2/24 – 29/2/24 and 19/3/24 – current date.  <b>Material facts and circumstances:</b> <ul style="list-style-type: none"> <li>Freeboard level at the beginning of the wet season not sufficient to maintain fluid level below the minimum freeboard target level of 1100mm after actual rainfall experience near the end of the wet season.</li> <li>The freeboard design capacity contained the rainfall and no over topping occurred.</li> <li>Freeboard levels have been reported to DEPWS each week in the weekly report submissions (Freeboard levels and dates attached in Section 5).</li> </ul>			Supporting information attached <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>Did the incident result in an environmental impact or risk not specified in approved EMP?</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>If yes, describe the nature and extent of the environmental impact or risk</b>		Supporting information attached <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>Did the incident result in a contravention of a performance standard(s) specified in the approved EMP?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>If yes, describe the contravention of the environmental performance standard(s)</b>	Performance standard: “Freeboard for all pits, Flowback water and Produced Water Tanks maintained at all times” not achieved toward the end of the wet season.	Supporting information attached <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>Is the incident inconsistent with an environmental outcome(s) specified in the approved EMP?</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>If yes, describe how the incident is inconsistent with the environmental outcome(s)</b>		Supporting information attached <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

<p><i>If the answer to the above questions is 'No', consider whether the incident is a recordable incident.</i></p>					
<p><b>Reg 35(3)(c)(iii): Action taken to avoid or mitigate any environmental impacts or risks of the incident</b> refer to Section 5.4.3 of the <a href="#">Onshore Petroleum Incident Reporting Guideline</a></p>	<p>Level monitoring undertaken via cameras, remote sensors and helicopter deployment to verify remaining freeboard adequate to avoid overtopping.</p> <p>Freeboard remains available to contain additional rainfall in the cutting pit, sump and wastewater tank until the end of the wet season.</p> <p>No environmental impact occurred.</p>			<p>Supporting information attached <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p><b>Reg 35(3)(c)(ii): Corrective action taken, or proposed, to prevent a similar incident occurring in future</b> refer to Section 5.4.4 of the <a href="#">Onshore Petroleum Incident Reporting Guideline</a></p>	<ol style="list-style-type: none"> <li>Prior to the next wet season calculate the required fluid for the tank, sump and pit (if open) to account for maintaining adequate freeboard throughout the wet season.</li> <li>Work with DEPWS to obtain approval to close the Carpentaria 2 drilling sump and cuttings pit prior to the onset of the next wet season.</li> </ol>			<p>Supporting information attached <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p><b>Incident number</b></p>	<p>2.</p>				
<p><b>Incident date</b></p>	<p>27/02/2024</p>	<p><b>Incident time</b></p>	<p>am</p>	<p><b>Date and time interest holder became aware</b></p>	<p>am 27/2/24</p>
<p><b>Reg 35(3)(c)(ii): All material facts and circumstances</b> refer to Section 5.4.2 of the <a href="#">Onshore Petroleum Incident Reporting Guideline</a></p>	<p><b>Description:</b> In an attempt to achieve the minimum target freeboard level in the Carpentaria 2 (C2) cuttings pit, a helicopter was deployed on 24/2/24 for personnel to pump fluid from the C2 cuttings pit to the drill sump (the drill sump had additional capacity). The fluid transfer by siphon was unattended, and during the transfer the minimum target freeboard in the drill sump was exceeded.</p> <p><b>Material Facts and circumstances:</b></p> <ul style="list-style-type: none"> <li>A siphon system was set up to transfer the fluids between the cuttings pit and the drill sump</li> <li>Monitoring of transfer completed by camera and remote sensors for 3 days.</li> <li>Monitoring identified fluid transfer projected to exceed minimum target freeboard level in drilling sump.</li> <li>Fluid transfer stopped on 28/02/24 after freeboard exceeded.</li> <li>Fluid levels returned to compliance by helicopter transported personnel.</li> </ul> <p>Freeboard levels and dates attached in Section 5.</p>			<p>Supporting information attached <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

<p><b>Did the incident result in an environmental impact or risk not specified in approved EMP?</b></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><b>If yes, describe the nature and extent of the environmental impact or risk</b></p>	<p>EMP 4-3 Spill Management Plan doesn't specify risks of unattended fluid transfer. Table 2 in the Spill Management Plan states "sites are manned during operations" to mitigate the risk of spills from chemical and wastewater during handling, treatment and storage on-site.</p>	<p>Supporting information attached <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p><b>Did the incident result in a contravention of a performance standard(s) specified in the approved EMP?</b></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><b>If yes, describe the contravention of the environmental performance standard(s)</b></p>	<p>Performance standard: "Freeboard for all pits, Flowback water and Produced Water Tanks maintained at all times" not achieved at all times during the wet season.</p>	<p>Supporting information attached <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p><b>Is the incident inconsistent with an environmental outcome(s) specified in the approved EMP?</b></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><b>If yes, describe how the incident is inconsistent with the environmental outcome(s)</b></p>		<p>Supporting information attached <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p><i>If the answer to the above questions is 'No', consider whether the incident is a recordable incident.</i></p>				
<p><b>Reg 35(3)(c)(iii): Action taken to avoid or mitigate any environmental impacts or risks of the incident</b> refer to Section 5.4.3 of the <a href="#">Onshore Petroleum Incident Reporting Guideline</a></p>	<p>Planned to conduct a fluid transfer, to maximize available freeboard, in both the cutting pit and the drill sump.</p> <p>Siphon set up to transfer fluids based on calculated fluids levels.</p> <p>Monitoring of transfer completed by camera remote sensors while site unattended.</p> <p>Helicopter was deployed on 28/2/24 to manually stop the siphon when identified that siphon likely not set to freeboard level marker.</p> <p>Helicopter deployed on to re-adjust the fluid of pits and bring freeboard to an acceptable level.</p> <p>No environmental impact occurred and there was there was no potential of material environmental ham or significant environmental harm because:</p> <ul style="list-style-type: none"> <li>• The siphon was set up to only siphon 1000mm maximum. When the siphon was manually stopped 28/2/24 there were only a few centimetres left of water to transfer. Only another 50mm of fluid would have transferred if the siphon was not manually stopped, it would not have over topped.</li> <li>• If the hose became broken or dislodged during fluid transfer, the siphon would have either stopped working as air entered the hose, or a minor spill (the volume of the fluid held in the pipe ~5L) would have occurred between the cutting pit and well pad on the fenced well pad.</li> </ul>			<p>Supporting information attached <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

	<ul style="list-style-type: none"> <li>There was over 900mm of freeboard availability left in the Carpentaria 2 sump.</li> </ul>	
<p><b>Reg 35(3)(c)(ii): Corrective action taken, or proposed, to prevent a similar incident occurring in future</b> refer to Section 5.4.4 of the <a href="#">Onshore Petroleum Incident Reporting Guideline</a></p>	<ol style="list-style-type: none"> <li>Work with DEPWS to obtain approval to close the Carpentaria 2 drilling sump and cuttings pit prior to the onset of the next wet season.</li> <li>Prior to the next wet season calculate the required fluid for the tank, sump and pit (if open) to account for maintaining adequate freeboard throughout the wet season.</li> </ol>	<p>Supporting information attached</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

**Section 4 - Declaration**

A person with legal authority to sign on behalf of the interest holder, or all interest holders (if more than one), must sign the declaration.

I hereby declare that I:

- am authorised to make this declaration.
- confirm that, to the best of my knowledge all information provided addresses the relevant matters and is true, correct, complete, and does not contain misleading information
- am aware that it is an offence under section 107 of the *Petroleum Act 1984* to give an authorised person information that I know, or ought to reasonably know, to be false or misleading in a material manner particular
- understand that all information supplied as part of this form, including attachments, may be disclosed publically in accordance with regulation 35A of the Petroleum (Environment) Regulations 2016, and consistent with the requirements of the Information Privacy Principles (IPPs) in the *Information Act 2002*.

**If report being signed by interest holder/s (include attachment if more room is required to complete the below table)**

	Interest Holder 1	Interest Holder 2	Interest Holder 3	Interest Holder 4
<b>Company Name</b>	Imperial Oil & Gas Pty Ltd			
<b>Signature</b>				
<b>Name (print)</b>	Robin Polson			
<b>Position</b>	Chief Financial Officer			
<b>Date</b>	12 April 2024			
<b>Email</b>	compliance@empiregp.net			

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## Section 5 – Supporting Information

Figure 1: Freeboard availability at Carpentaria 2 wastewater storage.

Date	Cutting Pit Freeboard (cm)	Sump Freeboard (cm)	Tank Freeboard (cm)
19/2/24	105	332	126
20/2/24	92	316	116
21/2/24	92	317	116
22/2/24	93	318	116
23/2/24	93	312	110
24/2/24	93	303	111
25/2/24	107	289	111
26/2/24	126	114	111
27/2/24	138	104	112
28/2/24	136	96	108
29/2/24	135	96	107
1/3/24	117	118	107
2/3/24	116	118	107
3/3/24	114	117	106
4/3/24	114	118	107
5/3/24	114	118	106
6/3/24	112	117	106
7/3/24	112	118	106
8/3/24	111	118	105
9/3/24	110	117	104
10/3/24	111	118	105
11/3/24	111	119	105
12/3/24	111	120	105
13/3/24	112	121	106
14/3/24	112	122	106
15/3/24	113	123	107
16/3/24	111	121	105
17/3/24	111	122	106
18/3/24	110	121	104

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Date	Cutting Pit Freeboard (cm)	Sump Freeboard (cm)	Tank Freeboard (cm)
19/3/24	90	101	90
20/3/24	90	101	89
21/3/24	72	92	80
22/3/24	70	91	78
23/3/24	69	90	77
24/3/24	70	91	77
25/3/24	69	91	76
26/3/24	66	88	73
27/3/24	66	90	74
28/3/24	67	91	74
29/3/24	68	92	74
30/3/24	68	93	74
31/3/24	67	92	73