

Onshore Petroleum Activity – NT EPA Advice

TAMBORAN B2 PTY LTD – STURT PLATEAU COMPRESSION FACILITY – APPRAISAL GAS ENVIRONMENT MANAGEMENT PLAN (EMP), EP98 AND EP117 (TAM2-3)

BACKGROUND

The previous Minister for Environment 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 (ALARP) 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	Tamboran B2 Pty Ltd (Tamboran) as Operator on behalf of Tamboran B2 Pty Ltd Falcon Oil & Gas Australia Limited
Petroleum interest(s)	Exploration Permit 98 and 117
Environment Management Plan (EMP) title	Sturt Plateau Compression Facility- Appraisal Gas, prepared by Tamboran, dated 2 Oct 2024
EMP document reference	TAM2-3
Regulated activity	Both EPs are situated within the Beetaloo Sub-basin of the Northern Territory. The EMP includes the following regulated activities: <ul style="list-style-type: none"> • Civil construction activities, including bulk earth works to level and grade the hard stand area in preparation for installation of foundations, the majority of which will be driven steel pilings to minimise the use of concrete.

	<ul style="list-style-type: none"> • Construction of a camp (2.0 ha) and fencing / firebreak (1.0 ha) to support the Sturt Plateau Compression Facility (SPCF). • Construction, operation, maintenance and decommissioning of the SPCF and ancillary infrastructure that captures and converts appraisal gas from E&A wells to clean gas, (delivered into the AGP via the Sturt Plateau Pipeline). • Tie in of the SPCF to the existing approved gathering networks between Kyalla 117 N2 and Shenandoah S2 to receive/manage wastewater. • Connection of the compression facility inlet separator to the Shenandoah S2 wastewater storage area via a new wastewater pipe. • All ancillary tie-in activities to the Sturt Plateau Pipeline, necessary to support the regulated activities. Compressed gas collected at the site will be metered and fed into the Sturt Plateau Pipeline.
Public consultation	Public consultation on the EMP was not required under regulation 8A(1)(b) as the EMP does not propose drilling of petroleum wells or hydraulic fracturing.

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. The proposed work program is scheduled to take place from 2024 to 2029.

Table 1: Key components of the proposed work program for the Strut Plateau Compression Facility – Appraisal Gas EMP (TAM2-3)

Component/aspect	Proposed
AAPA certificate	C2024/065 (Variation to C2024/031)
Total area of EP 98 and EP 117	EP 98 -10,300 km ² (1,030,000 ha) EP 117 - 6,375 km ² (637,500 ha)
Total area of surface disturbance	8 ha 5 ha – existing disturbance 3 ha – new disturbance
Groundwater extraction license	GRF 10285 (450 ML/annum)
Groundwater usage	<ul style="list-style-type: none"> • 11.9 ML for camp operations • ML civil construction, dust suppression • 22.6 ML general SPCF operations
Camp	150-person camp
Peak traffic movements	23 vehicles per day
Flowback volume generated	0.03 ML/month
Greenhouse gas emissions	~200,880 tCO ₂ -e

1.1 Activity Scope and Duration

This Environment Management Plan (EMP) proposes to complete a series of Exploration and Appraisal (E&A) activities over 5 years on exploration titles EP 98 and 117. EP98 is situated adjacent to the town of Daly Waters, to the west, south and east. EP117 is located approximately 17 km southeast and 60 km southeast of Daly Waters, on Hayfield / Shenandoah East Station. The EMP includes new activities as well as activities approved under Beetaloo Basin Shenandoah South E&A Program (TAM1-3). The additional vegetation clearing has been minimised by locating the SPCF facility on the existing 5.0 ha laydown area on the Shenandoah S2 site, use of gravel from the existing gravel pits and use of existing access tracks. This disturbance is approved under TAM1-3. The Project has a total disturbance area of 8.0 ha, however only 3.0 ha of clearing is required, as detailed below:

- 5.0 ha (existing cleared area): Tamboran will repurpose the Shenandoah S2 laydown area on EP 98, approved under the TAM1-3 EMP to accommodate the SPCF and ancillary infrastructure.
- 2.0 ha (new clearing): SPCF camp.
- 1.0 ha (new clearing): Fencing and firebreak.

The key purpose of the regulated activity under this EMP is to collect, use and sell appraisal gas (approved under Section 57AAA of the *Petroleum Act 1984*), which helps to inform the future technical and commercial viability of the underlying shale gas within EP98 and EP117.

The total amount of ground water used for the proposed activity in this EMP is approximately 60 ML (~ 12 ML per annum). The groundwater will be extracted from the existing water extraction bores located on the adjacent Shenandoah S2 well pad. The groundwater extraction is approved under Water Extraction Licence (GRF10285), in accordance with *Water Act 1992*. Approximately 32 ML of

water for civil construction activities such as dust suppression surface conditioning and camps. Operational water usage is estimated to approximately 28 ML, predominantly used for evaporative cooling.

There are no national parks, conservation area, archaeological site, groundwater dependent ecosystem within the project area. The closest receptor to the site includes a mapped water course 27 km to the west and a pastoral bore which is round 2 km to the north-west.

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.

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) when undertaking the regulated activity. Appendix K of the EMP demonstrates how the relevant sections of the Code have been applied to the mitigation and management of impacts and risks. The EMP also provides the following plans which is same and are in force across all active sites operated by the interest holder, which are compliant with the Code:

- Erosion and Sediment Control Plan (Appendix F)
- Weed Management Plan (Appendix B)
- Bushfire Management Plan (Appendix A)
- Wastewater Management Plan (Appendix E)
- Spill Management Plan (Appendix D)
- Rehabilitation Management Plan (Appendix L)
- Emergency Response Plan (Appendix N)
- Methane Emissions Management Plan (Appendix G)

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

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).

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 to avoid long-term impacts to the environment. The EMP includes additional mitigations associated with wet season activities, to mitigate potential impacts associated with erosion and sedimentation, off-site wastewater release, and transport of chemicals and wastewater. These controls have been assessed as adequate.

The interest holder has identified stakeholders and committed to ongoing stakeholder engagement in the EMP.

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 and address scientific uncertainty and avoid the threat of serious or irreversible damage.

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. Uncertainty in relation to the environmental features was assessed, with no areas of environmental uncertainty identified.

Tamboran has considered the precautionary principle in remote areas during the assessment of threatened fauna. There are some species that have been assessed as possibly occurring even though their primary habitat is not found within the proposed sites or access tracks. These include species that are associated with ephemeral wetlands, low lying areas that may be seasonally inundated and creeks. During the wet and early dry season these areas may sustain threatened species such as wetland birds (including migratory species).

The risks of conducting the activity over the wet season are well understood, and the EMP demonstrates adherence to the Code. 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.

Groundwater bores installed at the Shenandoah S2 well pad will be used to service the SPCF. The disturbance for and installation of these bores is covered under the approved TAM1-3 EMP. The interest holder has proposed to extract approximately 60 ML of groundwater for this EMP period.

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 wide environmental monitoring commitments contained in the EMP are compliant with the Code and provide measurable performance measures to ensure that the environmental outcomes are met. The EMP commits to the preparation and submission of an annual environmental performance report, however the NT EPA recommends a Ministerial condition outlining the timing and form of the submission.

2.3 Principle of evidence-based decision-making

A good understanding of the existing environment is demonstrated through a combination of desktop assessment and field-based survey of the proposed activity locations. AECOM completed the land condition assessment and heritage assessment in March-April 2023. The previous baseline assessments completed in 2004, 2006, 2010, 2014, 2016, 2018, 2021 and the Strategic Regional Environmental and Baseline Assessment (SREBA) Terrestrial Ecosystems baseline report has been considered for the assessment. These assessments have informed the assessment of risk to listed species and their habitats and assisted in selection of sites for conduct of the regulated activity such that potential impacts may be minimised.

The EMP includes a detailed risk assessment related to chemical handling, storage and use. The chemical risk assessment in Appendix D demonstrates the risk of impact to the environment can be managed. The proposed management measures for wastewater are satisfactory, with secondary containment proposed to be used as well as satisfactory spill response procedures. As a precautionary step the NT EPA recommends a Ministerial condition for this activity relating to the recording of spills.

The EMP includes an assessment of traffic impacts on other road users and concludes traffic impacts are manageable, based on the staging of the regulated activity and the short duration of peak traffic periods.

The proposed environmental outcomes are likely to be achieved based on the best available information on the environment in which the regulated activity will be conducted. The studies undertaken by the interest holder to inform the EMP affords the interest holder with a detailed and

reliable knowledge of the potential environmental impacts and risks and the most appropriate measures for mitigation of those impacts and risks.

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 cultural interests is achieved through compliance with the requirements of Authority Certificate issued by the Aboriginal Areas Protection Authority under the *Northern Territory Aboriginal Sacred Sites Act 1989* (NT) and an archaeological assessment of disturbance areas to avoid archaeological heritage impacts.

Total greenhouse gas (GHG) emissions predicted to be generated by the regulated activity are approximately 200,880 tCO₂-e. This EMP is proposing to construct SPCF to minimise Scope 1 greenhouse gas emission and to allow appraisal to be beneficially used rather than flared. The interest holder is required to develop a Greenhouse Gas Abatement Plan conditioned under previous EMPs.

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 shale resource, exploration will take a number of years to complete, in order to assess the viability of the resource prior to production. The use of previously cleared pad to construct the SPCF and used of existing access track allows this assessment to take place under a reduced clearing footprint.

Cumulative impacts of groundwater extraction have been assessed. The interest holder has a groundwater extraction licence GRF10285 with a maximum water entitlement of 450 ML per annum from the Gum Ridge formation within the Cambrian limestone Aquifers. The anticipated water demand for this regulated activity is approximately 12 ML per annum, which is less than the interest holder's maximum water entitlement.

The proposed offsetting regime of GHG emissions is consistent with the NT Government's expectations for new large emitting projects to reduce and manage emissions in a way that enables development to occur while contributing to the Territory's emissions target of net zero greenhouse gas emissions by 2050. To support the NT Government's commitment, the NT EPA recommends the interest holder be required to provide a revised Greenhouse Gas Abatement Plan annually, to specify actual emissions, the quantum of emissions to be offset, and to provide a demonstration of how offsetting commitments have been met.

As emissions in the EMP are estimates, a Ministerial condition is recommended that requires the interest holder to provide an annual emission report to the Department that summarises GHG emissions reported under the Australian Government's *National Greenhouse and Energy Reporting Act 2007* versus the predicted emissions in the EMP.

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

The proposed location for the regulated activity does not include groundwater dependent ecosystems; nor is it within proximity to a declared ecological community under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*.

The regulated activity poses a low risk to the ecosystem within the Sturt Plateau bioregion. Given the relatively small area of land clearing (approximately 3.0 ha), and the very large area of similar habitat within the region, the regulated activity does not pose a significant risk to any regional populations of listed species. No critical habitat for listed fauna was identified in the project area, but 18 listed species potentially occur in the wider landscape. Due to the management strategies outlined in the EMP and the relatively small area of impact, it is unlikely that the regulated activity will pose a risk to the identified listed species.

Avoidance and mitigation measures identified in the EMP are adequate to reduce risks from, for example, vehicle-strike, dust, erosion and/or spills to ALARP and acceptable levels, in relation to potential impacts on biodiversity.

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. Specific precautions to ensure interaction with wildlife is avoided are included in the EMP. These include inspections for fauna presence, speed limits on access roads, gathering/wastewater lines and daily checks of infrastructure.

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 disposal of waste, commercial purchase of groundwater, and progressive rehabilitation of all disturbed areas to an acceptable standard, are at the cost of the interest holder. The interest holder is required to provide an environmental security, that may be accessed to remediate disturbance in the event an interest holder does not or cannot fulfil remediation and rehabilitation requirements.

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 commits to identified measures to avoid or minimise impacts on environmental values, informed by a baseline studies, desktop assessments and data derived from previous operations in the area. The EMP systematically identifies and assesses environmental impacts and risks associated with the regulated activity. The key potential environmental impacts and risks considered in the EMP are impact on listed threatened habitats, flora and fauna from accidental ignition, impact on sacred site or culturally sensitive, increased nuisance from dust and particulate emissions to regional ecosystems, impacting workers and the broader environment from a loss of primary containment etc.

The EMP demonstrates why the controls to be implemented are considered ALARP and acceptable. Of the 31 environmental risks identified by the interest holder, 27 are considered 'low' risk and therefore are considered to manage impacts and risks to ALARP and acceptable levels. The remaining 6 risks are considered 'medium' 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. *Impact to listed threatened habitats and listed threatened flora and fauna, including habitats fragmentation, non-listed fauna and livestock from exploration activities:* The interest holder has committed to locate the activity away from nesting location of threatened species, complete scouting of the area that needs to be cleared, implementing bushfire management plan to prevent and responding bushfires, designated smoking areas, availability of firefighting equipment to deal with fires, construction of fire breaks around the SPCF, no flaring during periods of total fire ban. The residual risk ranking is based on the likelihood being considered 'highly unlikely', but the consequence of the event occurring being considered to be 'serious'.
2. *Disturbance of sacred site or culturally sensitive area, loss of spiritual connection with land and decline in environmental value of area used for hunting, foraging and enjoyment:* The interest holder has committed to implement bushfire management plan to prevent and respond to bushfires, bushfire awareness included in the site inductions, designated smoking areas on-site, construction of fire breaks, ignition source placed outside of the hazardous area, no flaring during periods of total fire ban, activities to comply with pastoralist and regional bushfire management plans. The residual risk ranking is based on the likelihood being considered 'highly unlikely', but the consequence of the event occurring being considered to be 'serious'.
3. *Reduction in land production:* The interest holder has committed to have a Biosecurity Declaration Certificate prior to access to site, all equipment and vehicles will be washed-down prior entering the site, activity will be restricted to defined well site and SPCF, activities will comply with pastoralist and regional bushfire management plan, placing ignition source outside of the hazardous area, designated smoking areas on-site, using intrinsically safe equipment in hazardous area. The residual risk ranking is based on the likelihood being considered 'highly unlikely', but the consequence of the event occurring being considered to be 'serious'.
4. *Increased traffic movements impacting pastoralists, community (including native title holders), tourists, workers and contractors:* The interest holder has committed to do the complete traffic impact assessment, implement alcohol and drug policy with zero policy, workers flown in and out of Daly waters from Darwin, use of buses to limit vehicle transport movements between the Daly Waters airport and remote camps, the camp is located away from major roads with most movements is internal between the camp and SPCF. The residual risk ranking is based on the likelihood being considered 'highly unlikely', but the consequence of the event occurring being considered to be 'major'.
5. *Loss of primary containment (process safety event or sabotage) impacts workers, community and the environment:* The loss of primary containment is mitigated by designing the hydrocarbon facilities to accepted industry codes and standards, independent validation of the facility designs, quality assurance of installed equipment, inspection and condition monitoring program, gas detection in the enclosure, flash proof electrical installation, remote monitoring of pressure and flow, emergency shut down system and response procedures, sites manned during operations, security cameras on site, site and valves locked. The residual risk ranking is based on the likelihood being considered 'remote', but the consequence of the event occurring being considered to be 'major'.
6. *Increased nuisance from dust and particulate emissions associated with exploration activities caused impacts to regional ecosystems and fauna:* The increased nuisance from dust and particulate emissions is mitigated by using water trucks to decrease dust emissions, maintaining road to prevent dust generation during construction, implementing bushfire management plan, placing ignition sources outside of the hazardous area. The residual risk ranking is based on the likelihood being considered 'unlikely', but the consequence of the event occurring being considered to be 'moderate'.

The EMP also considers cumulative impacts related to groundwater use, flora and fauna, GHG emissions, traffic and social and concludes these 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 and that it meets the requirements of regulation 9(1)(c), 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 to meet prescribed requirements and to confirm the effectiveness of mitigations committed to.

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

Aspect	Records/Reports & Type of Monitoring/Inspection		Frequency
Erosion and sediment control	Record(s)	Visual inspection of infrastructure and erosion and sediment controls	Pre and post wet season
		Civil construction daily report	Daily
	Report(s)	Annual environment performance report	Annual
Surface water	Record(s)	Stormwater release spreadsheet	Weekly during wet season
Groundwater	Record(s)	Groundwater volume	Continuous flow meter
	Report(s)	Groundwater retained report	Monthly
Emissions	Record(s)	Methane emission monitoring program <ul style="list-style-type: none"> To identify and rectify gas leaks To monitor combustion efficiency 	<ul style="list-style-type: none"> Quarterly Daily during operations
		Report(s)	Audit report on emission
			All emissions related data (fuel use, flaring volumes, venting volumes, wastewater volumes etc.) reported in accordance with NGRS requirements.
Bushfire	Record(s)	Incidents of bushfire caused by Tamboran's activities.	As required
		Fire mapping to monitor changes to fire frequency in the area	Annual
Weeds	Record(s)	Weed monitoring completed pre and post wet season on all disturbed areas.	Pre and post wet season
	Report(s)	Weed Management Plan	Annual
Chemicals or wastewater or gathering lines	Record(s)	SPEL tank level and volume measurement	As required
		Incident records	As soon as possible
		Level monitoring of secondary containment	Daily
		Gathering and wastewater pipeline inspection	Monthly
		Detect water leaks from gathering lines	Monthly for buried gathering lines (during operation) Weekly for above ground lines (during operation)
Heritage	Record(s)	Non-compliances with AAPA certificate conditions including unauthorised work within RWA	As required
		Environmental programs completed by indigenous contractors retained	As required

Aspect	Records/Reports & Type of Monitoring/Inspection		Frequency
		Country meetings retained	As required
	Report(s)	Work program update report	Annual
	Report(s)	Rehabilitation monitoring report	Annual
Community	Record(s)	Community complaints and actions completed.	As required
		Project expenditure data confirms the NT business spend	As required

5. Considerations under the *Environment Protection Act 2019*

In accordance with section 48 of the *Environment Protection Act 2019* (NT) (EP Act), a proponent must refer to the NT EPA, a proposed action (section 5) that has the potential to have a significant impact (sections 10 and 11) on the environment. Alternatively, in accordance with section 53(1) the NT EPA may provide a written notice (a call-in 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.

The NT EPA has had regard to sections 10 and 11 of the EP Act and its published guidance, Referring a Proposal to the NT EPA, and has determined that:

- a) The industry type or activity presents inherent hazardous, that could pose significant risks to the environment. However, by implementing comprehensive control measures and appropriate condition, the risks can be effectively mitigated.
- b) The location of the regulated activity has avoided impacts to sensitive environmental values and receptors to the greatest extent possible and where unable to be avoided, any potential impacts have been mitigated so they would not be significant.
- c) At no stage of its lifecycle, including post closure, would the activity, on its own or cumulatively with other activities, have a significant impact on the environment.

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

6. Other relevant matters

The EMP includes a detailed schedule for the regulated activity which also will require approval to sell appraisal gas from the Minister for Mining and Energy under the *Petroleum Act 1984*.

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; and
- 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 ALARP 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 Tamboran B2 Pty Ltd EMP be approved, 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 regulated activity and quarterly timetable updates.

2. Certainty as to the extent and location of clearing through provisions 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 DLPE 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 timing of the submission of annual performance reports and rehabilitation progress reports.
5. Certainty as the extent of greenhouse gas emissions through provision of an annual emissions report to DLPE that summarises GHG emissions reported under the Australian Government's *National Greenhouse and Energy Reporting Act 2007* versus the predicted emissions in the EMP, with actual emissions to be verified by an independent auditor registered by the Clean Energy Regulator.
6. Certainty that the 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.
7. Confirmation that GHG emissions are being offset through provision of a revised GGAP annually, to specify actual emissions (as measured and reported on in item 3 above), the quantum of emissions to be offset in compliance with the offset commitments in the GGAP, and provision of annual demonstration of how those commitments have been met.

(ii)



PAUL VOGEL AM
CHAIRMAN

NORTHERN TERRITORY ENVIRONMENT PROTECTION AUTHORITY

25 OCTOBER 2024