

Annual Environment Performance Report


1 October 2022 – 30 September 2023 Imperial

Oil & Gas Pty Ltd

2020-21 Drilling Program NT IMP2-6.1

Date	Version	Author	Checked	Approved
7/12/2023	1	Rachel Leembruggen	TS, KW	RP

Document title	Annual Environment Performance Report
EMP title	Imperial 2020-21 Drilling Program NT (IMP2-6.1)
Exploration Permit/Licence Number	Exploration Permit 187
Interest holder details	Imperial Oil & Gas Pty Ltd
Operator details	Imperial Oil & Gas Pty Limited Level 5, 6-10 O'Connell Street Sydney NSW 2000 ABN 92002699578

Signature and Certification	
I certify on behalf of Imperial Oil & Gas Pty Ltd this document is a true and accurate record of performance.	
Signature	
Position	Chief Financial Officer
Date	7 December 2023

Acronyms / Terms	Definition
AEPR	Annual Environment Performance Report
Code	Code of Practice: Onshore Petroleum Activities in the Northern Territory
DEPWS	Department of Environment, Parks and Water Security (NT)
DITT	Department of Industry, Tourism and Trade (NT)
EMP	Environment Management Plan
EP	Exploration Permit
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth)
NT	Northern Territory
Regulations	Petroleum (Environment) Regulations 2016 (NT)

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1. Introduction

The Northern Territory (NT) Petroleum (Environment) Regulations 2016 (NT) (the Regulations) require an interest holder to provide a report to the Minister for Environment on an annual basis that outlines the environmental performance of the interest holder¹ (the Annual Environment Performance Report). The report must include sufficient information to allow the Minister to assess whether the interest holder has met the environmental outcomes and environmental performance standards included in the approved Environment Management Plan (EMP). The report is to consider information required to be recorded, monitored or reported under the Regulations and any other law in force in the NT related to the conduct of the regulated activity.

This Annual Environmental Performance Report (AEPR) outlines the environmental performance of Imperial Oil and Gas Pty Ltd in respect to achieving the environmental outcomes and environmental performance standards, and monitoring, recording, and reporting requirements described within:

- 2020-21 Drilling Program NT Environmental Management Plan EP 187 (IMP2-6.1), approved on the 30th of September 2020. Hereafter referred to as the EMP.

The period covered by this AEPR is from 1 October 2022 to 30 September 2023, inclusive.

Timeline of the regulated activities as described in the EMP:

- EMP Imperial 2019 Drilling Program NT Exploration Permit (EP) 187 (IMP2-04) Approval 2 March 2020
- Civil Operations for Carpentaria-1 began on 17 August 2020 and were finalised on the 11 September 2020
- EMP Imperial 2020-21 Drilling Program NT Exploration Permit (EP) 187 (IMP2-6.1) Approval 30 September 2020 superseding the IMP2-04 EMP
- Drilling of Carpentaria-1 began on 23 September 2020 and was finalised on 23 October 2020
- Note: Activities on-site associated with hydraulic fracturing operations began in February 2021. The associated environmental outcomes and performance standards are covered under separate EMP IMP3-4.

¹ Petroleum (Environment) Regulations 2016 (NT) sch 1, item 11.

1.1. Background

The EMP was approved on 30th September 2020.

The regulated activities covered under this EMP include:

- Civil construction of access tracks, well sites and accommodation camp
- Drilling of up to two wells on two separate locations within EP 187

The location of the regulated activities is shown in **Figure 1**.

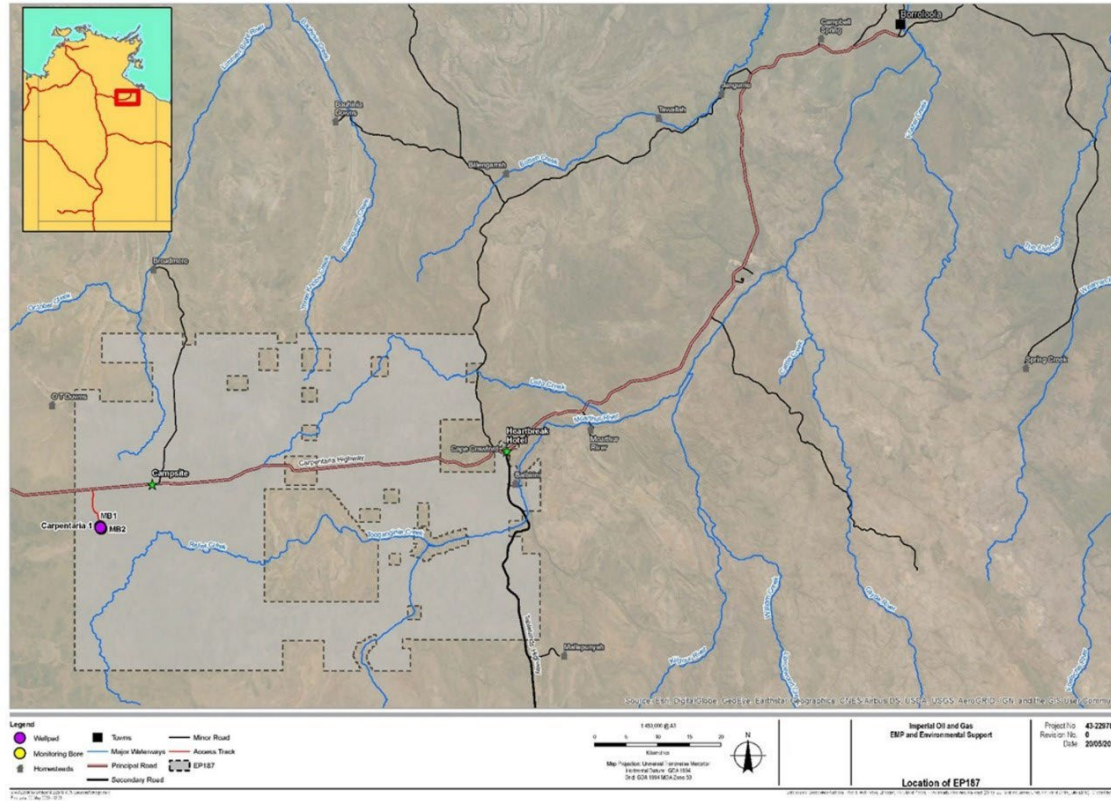


Figure 1 Location of the Carpentaria 1 well pad in relation to EP 187

1.2. Contents of performance report

This AEPR describes the environmental performance of Imperial by evaluation of the following:

1. compliance with Ministerial approval conditions, for each EMP
2. compliance with each environmental outcome and environmental performance standard within the approved EMP
3. compliance with reporting requirements in accordance with the Code and 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 performance

Table 1 shows the performance status indicators used in this AEPR.

Table 1: Performance Descriptors

Indicator	Description
Compliant	Compliant with requirement for entire 12-month reporting period
Not Compliant	Interest holder did not comply with the requirement fully or at all during the reporting period
Not Applicable	Requirement not applicable during the reporting period

1.4. Evidence of performance

The following sources of evidence are used to demonstrate compliance:

1. Internal assessment of compliance through verification of:
 - Communications Log
 - Quarterly Recordable Incident Reports submitted to Department of Environment, Parks and Water Security (DEPWS)

- 2022-2023 Emissions Report emailed to onshoregas.DEPWS@nt.gov.au 29 September 2023
- Annual Fire Mapping for EP 187 – May 2023
- EP 187 Equipment Servicing Register as submitted by Charles Dack to DEPWS on 1 March 2023
- Letter to DEPWS dated 29 September 2023 in response to File reference no. 33:2022/0006-004~0035 confirmed no uncontrolled releases or spills
- Site induction

2. External assessment of compliance through verification of:

2. DEPWS Weed Management Branch Inspection - Imperial Oil and Gas March 2023. Demonstration of Performance

Table 2 demonstrates Imperial's compliance with Ministerial EMP approval conditions.

Table 2: Compliance with Ministerial EMP Approval Conditions

No	Ministerial Condition	Performance Status	Evidence
1	Prior to commencement of activities on the Carpentaria – 2 well site, the interest holder must provide to Department of Environment, Parks and Water Security (DEPWS), at least 4 weeks prior to commencement of the regulated activity:		
	i. A detailed map and geo-reference location of the final Carpentaria – 2 well site on EP 187 selected, as referenced in the EMP	<i>Not Applicable</i>	Requirement not applicable to IMP 2-6. Carpentaria 2 well site occurred under the operation of IMP 4-3.
	ii. A geotechnical assessment report for the Carpentaria – 2 well site, developed by a suitably qualified independent person, that: <ul style="list-style-type: none"> • Includes results of 60cm soil cores, taken at three sites across the well pad area for 	<i>Not Applicable</i>	Requirement not applicable to IMP 2-6. Carpentaria 2 well site occurred under the operation of IMP 4-3.

No	Ministerial Condition	Performance Status	Evidence
	analysis of particle size distribution; <ul style="list-style-type: none"> • Determines the amount of excavation and quantity of surface material that will be required to be stripped at the well pad to ensure a stable base; • Determines the stockpiling requirements of stripped material; and • Determines the amount of suitable gravel material required to build the well pad. 		
2	The interest holder must provide to the DEPWS an updated timetable for the regulated activity prior to the commencement of the activity and provide an updated timetable to the DEPWS each month following commencement.	<i>Not Applicable</i>	No regulated activity occurred under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
3	In support of Schedule 1, item 11 of the Regulations and clause A.3.5 of the Code, the interest holder must provide geospatial files of the land disturbance footprint(s) to DEPWS within sixty (60) days of completion of each land clearing activity or within 6 months of approval of this EMP, whichever occurs first.	<i>Not Applicable</i>	No land disturbance occurred under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
4	The interest holder must provide to DEPWS a cementing report for the 13-3/8" and 9 5/8" casing strings as soon	<i>Not Applicable</i>	No cementing occurred under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.

No	Ministerial Condition	Performance Status	Evidence
	as practicable but not more than 14 days after completion of the cementing job for the Carpentaria-1 and Carpentaria-2 wells on EP 187.		
5	The interest holder must provide to DEPWS within six weeks of completion of drilling operations at the Carpentaria-1 well site, a laboratory analysis of drilling wastewater that may be contained in the drilling sump. The laboratory analysis must comply with the Code of Practice: Onshore Petroleum Activities in the Northern Territory, Table C.8: Wastewater chemistry analytes.	<i>Not Applicable</i>	No drilling occurred under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
6	In addition to the minimum methane leak detection inspection frequencies required by the Code, the interest holder must undertake methane leak detection within seven (7) days of commission equipment that is in hydrocarbon service and under pressure and record to an auditable standard.	<i>Not Applicable</i>	No equipment was commissioned under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
7	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 Petroleum (Environment) Regulations 2016 (NT). The first report must cover the 12 month period from the date of this approval, and be provided within three	Compliant	This Annual Environment Performance Report has been provided to DEPWS in accordance with item 11(1)(b) in schedule 1 of the Petroleum (Environment) Regulations 2016 (NT). It covers the previous 12-month reporting period from the date of the original approval (30/9) and is provided within three calendar months of the end of the reporting period (due 30/12/annually). The annual environmental performance report aligns with the template prepared by DEPWS for this purpose and includes a signed declaration by the interest holder or operator.

No	Ministerial Condition	Performance Status	Evidence
	calendar months of the end of the reporting period. The annual environmental 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.		Imperial received a warning letter from DEPWS (File reference 33:2021/0015-012~0004) on the 21 September 2023 regarding the previous timeframe of the 2021- 2022 AEPR submission. The issue was regarding submission dates based on a revised approval note and subsequently the performance report was revised with appropriate dates. However, as this 2022-2023 AEPR is compliant with the required timeframes, Imperial considers itself compliant with the Ministerial Condition.

Table 3 provides a systematic overview of Imperial's performance against the environmental outcomes and environmental performance standards within the approved EMP.

Table 3: Compliance with Environmental Outcomes and Environmental Performance Standards

No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
1	Minimise impacts to ecosystem and human health values	No asset integrity failures	Compliant	Quarterly Recordable Reports contain no reports of asset integrity failures under IMP2-6. <ul style="list-style-type: none"> Q4 October – December 2022 Q1 January – March 2023 Q2 April – June 2023 Q3 July– September 2023 EP 187 Equipment Servicing Register as submitted by Charles Dack to DEPWS on 1 March 2023 contains no reports of asset integrity failures under IMP2-6.
2		No uncontrolled releases		Quarterly Recordable Reports contain no reports of uncontrolled releases under IMP2-6. <ul style="list-style-type: none"> Q4 October – December 2022 Q1 January – March 2023 Q2 April – June 2023 Q3 July– September 2023 Letter to DEPWS dated 29 June 2023 in response to File reference no. 33:2022/0006-004~0035 confirmed no uncontrolled releases under IMP2-6.
3		No uncontrolled releases of chemicals and hazardous materials		Quarterly Recordable Reports contain no reports of uncontrolled releases under IMP2-6. <ul style="list-style-type: none"> Q4 October – December 2022 Q1 January – March 2023 Q2 April – June 2023 Q3 July– September 2023

No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
				Letter to DEPWS dated 29 June 2023 in response to File reference no. 33:2022/0006-004~0035 confirmed no uncontrolled releases occurred under IMP2-6.
4		No incorrect storage and use of chemicals and hazardous materials	<i>Not Applicable</i>	No storage and use of chemicals and hazardous materials was handled under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
5	Minimise impacts on soil, surface water, groundwater, sensitive habitat and air quality	No unregulated waste handling	<i>Not Applicable</i>	No regulated waste was handled under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
6	Minimise creation of food sources or habitat for pest species	Absence of domestic waste remaining onsite at completion of activities (i.e. general rubbish, waste chemicals, workshop wastes including oily rags, containers etc)	<i>Not Applicable</i>	Activities onsite being undertaken under IMP3-4.
7		Pest species not encouraged to the site	<i>Not Applicable</i>	Activities onsite being undertaken under IMP3-4.
8	Minimise waste generation through reduce, reuse, recycle programs	All waste certificates to be noted and accounted for	<i>Not Applicable</i>	No regulated waste was handled under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
9	Minimise disturbance to land and land use (including soils and terrain, flora and fauna)	Land disturbance equal to or less than planned	<i>Not Applicable</i>	No land disturbance occurred under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
10	Minimise erosion (via water or wind) and sediment releases	Minimum incidences of erosion and sedimentation occurring	<i>Not Applicable</i>	Erosion monitoring being undertaken under IMP3-4 daily checks.
11		No new erosion flow paths originated from site	<i>Not Applicable</i>	Erosion monitoring being undertaken under IMP3-4 daily checks.

No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
12	Protection of waterways	No flow on effects caused by flooding at Imperial's drilling sites	<i>Not Applicable</i>	No flooding occurred under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
13	Return disturbed areas to a stable landform such that they are returned to a condition as close as practicable to the surrounding area (or pre-disturbance state) within an acceptable time frame.	Areas left safe, stable and non-polluting	<i>Not Applicable</i>	Activities onsite being undertaken under IMP3-4. Rehabilitation has not occurred under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
14	Protect the productivity of the land for its intended use	Commence to rehabilitate disturbed areas within 12 months of decommission	<i>Not Applicable</i>	Decommissioning has not occurred under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
15	A safe, stable landform consistent with surrounding land use	Successful rehabilitation to a similar condition of surrounding environment	<i>Not Applicable</i>	Rehabilitation has not occurred under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
16		No further habitat loss resulting from Imperial's activities	<i>Not Applicable</i>	Regulated activities not occurring under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023. Activities onsite being undertaken under IMP3-4.
17	Rehabilitation of disturbed areas is returned to the original land use and is consistent with the adjacent analogue site	Decommissioning of redundant assets	<i>Not Applicable</i>	No redundant assets under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
18	Avoid the introduction of weeds and pest fauna	No introduction of declared weeds and/or pest fauna resulting from Imperial's activities	Compliant	Weed Management Branch Inspection Imperial Oil and Gas March 2023

No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
19	Avoid the spreading of existing weeds and pest fauna	No spread of declared weeds and/or pest fauna resulting from Imperial's activities	Compliant	Weed Management Branch Inspection Imperial Oil and Gas March 2023
20	Minimise disturbance to flora and fauna	Monitoring EP 187 area to minimise impacts to fauna habitat and sensitive vegetation	Compliant	Weed Management Branch Inspection Imperial Oil and Gas March 2023
21		No native fauna impacts (injury or fatality)	Not Applicable	Regulated activities not occurring under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023. Activities onsite being undertaken under IMP3-4.
22	Minimise disturbance to sensitive areas	No loss of sensitive vegetation resulting from Imperial's activities	Not Applicable	Regulated activities not occurring under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023. Activities onsite being undertaken under IMP3-4.
23	Minimise the risk of causing bushfires from Imperial's activities	Successful fire management will be indicated by having no uncontrolled fires occurring as a result of Imperial's drilling activities	Not Applicable	No drilling activities occurred under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
24	Minimise (fire) impacts on environmental habitat and fauna, soil erosion, impacts on stakeholders, impacts on culturally significant sites, public infrastructure and community lands	Successful fire management will be indicated by having no uncontrolled fires occurring as a result of Imperial's drilling activities	Not Applicable	No drilling activities occurred under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
25	Prevent accidental fire risk and ensure safe storage of chemicals	Successful fire management will be indicated by having no uncontrolled fires occurring as a result of Imperial's drilling activities	Not Applicable	No drilling activities occurred under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.

No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
26	Minimise environmental nuisance due to dust for sensitive receptors resulting from Imperial's activities	No complaints regarding dust/ air quality	Compliant	No complaints on the Communications log.
27	Minimise greenhouse gas emissions		Not Applicable	No emissions occurred under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023. 2022-2023 Emissions Report emailed to onshoregas.DEPWS@nt.gov.au 29 September 2023
28	Minimise environmental nuisance due to dust for sensitive receptors resulting from Imperial's activities (regarding traffic and transport management)	An absence of issues raised by the community as indicator for successful communication	Compliant	No complaints on the Communications log.
29		No unresolved complaints	Compliant	No complaints on the Communications log.
30		The community is highly consulted with and all comments provided are assessed and those viable implemented	Not Applicable	Community consultation undertaken under IMP 3-4 and IMP 4-3.
31		High level of satisfaction by the community	Compliant	No complaints on the Communications log.
32		No vehicular accidents	Compliant	Quarterly Recordable Reports contain no reports of vehicular accidents under IMP2-6. <ul style="list-style-type: none"> • Q4 October - December 2022 • Q1 January - March 2023 • Q2 April - June 2023 • Q3 July- September 2023
33	Minimise impacts upon environmental values of the local community	An absence of issues raised by the community as indicator for successful communication	Compliant	No complaints on the Communications log.
34		No off-site release of contamination from road corridors	Compliant	Quarterly Recordable Reports contain no reports of releases under IMP2-6. <ul style="list-style-type: none"> • Q4 October - December 2022

No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
				<ul style="list-style-type: none"> Q1 January – March 2023 Q2 April – June 2023 Q3 July– September 2023
35	Minimise impacts on cultural heritage	The community is highly consulted with and all comments provided are assessed and those viable implemented	<i>Not Applicable</i>	Community consultation undertaken under IMP 3-4 and IMP 4-3.
36	Minimise safety risks to the public and other third parties	No vehicular accidents	Compliant	<p>Quarterly Recordable Reports contain no reports of vehicular accidents under IMP2-6.</p> <ul style="list-style-type: none"> Q4 October – December 2022 Q1 January – March 2023 Q2 April – June 2023 Q3 July– September 2023
37	Maintain and enhance partnerships with the local community, including using local contractors	High level of satisfaction by the community	<i>Not Applicable</i>	Regulated activities not occurring under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023. Local contractors engaged under IMP3-4 and IMP4-3.
38	No loss to the aesthetic or enjoyment factor for the community	No unresolved complaints	Compliant	No complaints on the Communications log.
39	Avoid disturbance of or damage to Aboriginal or cultural heritage artefacts or Sacred Sites	No incidences of disturbance of archaeological sites or sites of cultural significance	Compliant	<p>Quarterly Recordable Reports contain no reports of disturbance to archaeological sites under IMP2-6.</p> <ul style="list-style-type: none"> Q4 October – December 2022 Q1 January – March 2023 Q2 April – June 2023 Q3 July– September 2023
40	Minimise impacts upon or disruption to activities of Indigenous stakeholders in culturally significant areas		Compliant	<p>Quarterly Recordable Reports contain no reports of disturbance to archaeological sites under IMP2-6.</p> <ul style="list-style-type: none"> Q4 October – December 2022 Q1 January – March 2023

No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
				<ul style="list-style-type: none"> Q2 April – June 2023 Q3 July– September 2023 No complaints on the Communications log.
41	Ensure adequate background information and training is provided to employees and contractors working in culturally significant areas.		Compliant	EP 187 site inductions include cultural heritage section
42	Ensure that the health and safety of exploration workers and the community is not compromised through management of cultural and environmental awareness		Compliant	Quarterly Recordable Reports contain no reports of disturbance to archaeological sites under IMP2-6. <ul style="list-style-type: none"> Q4 October – December 2022 Q1 January – March 2023 Q2 April – June 2023 Q3 July– September 2023 No complaints on the Communications log.

Table 4 demonstrates Imperial's compliance with reporting requirements in the Code of Practice: Onshore Petroleum Activities in the Northern Territory (Code of Practice) and compliance with reporting and monitoring requirements under the Petroleum (Environment) Regulations 2016 (NT) schedule 1, item 11(2), which requires the EMP to include all information required to be recorded, monitored or reported. Where relevant, Imperial has also confirmed that all records, monitoring or required reporting under the Petroleum (Environment) Regulations 2016 (NT),² or under a commitment made in the EMP, has been provided to DEPWS or the relevant NTG agency.

Table 4: Compliance with Reporting and Monitoring Requirements

No	Reference	Requirement	Performance Status	Evidence
1	Code cl A.3.5 EMP s10.4	Geospatial information depicting areas cleared is to be provided to the Minister.	<i>Not Applicable</i>	No areas cleared under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
2	Code cl A.3.6 (b) EMP s7.1 & Appendix 06	Weed management plan developed as part of the EMP must provide for ongoing weed monitoring.	Compliant	Weed Management Plan of the approved EMP includes the required clause.
3	Code cl A.3.7(a)vi EMP s7.2 – Appendix 10	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	Bushfire Management Plan of the approved EMP includes the required clause.
4	Code cl A.3.9(c) Code cl A.3.9(e) EMP s7.3	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.	Compliant	Rehabilitation Management Plan of the approved EMP includes the required clause.

² Petroleum (Environment) Regulations 2016 (NT) sch 1, item 11(2).

No	Reference	Requirement	Performance Status	Evidence
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 fracturing 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.	<i>Not Applicable</i>	No hydraulic fracturing occurred under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
6	Code cl B.4.13.2(k)iv EMP s3.10	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.	<i>Not Applicable</i>	No venting occurred under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
7	Code cl B.4.14.2(c) EMP s3.6.1	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.	<i>Not Applicable</i>	No new barriers or well operating envelopes were established under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.

No	Reference	Requirement	Performance Status	Evidence
8	Code cl B.4.15.2(j) EMP s3.6.3	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.	<i>Not Applicable</i>	No petroleum wells were decommissioned under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
9	Code cl C.3(e) EMP s7.5 & Appendix 13 & 18	The components of the wastewater management framework, include: Monitor, manage and report in accordance with the Wastewater Management Plan and Spill Management Plan.	Compliant	The Waste and Wastewater Management Plan and Spill Management Plan of the approved EMP includes the required clause.
10	Code cl C.6.1(d) EMP s7.5 & Appendix 13	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	<i>Not Applicable</i>	Requirement not applicable to IMP 2-6. Carpentaria 1 Annual Wastewater Report submitted to DEPWS under the operation of IMP 3-4 on the 15 May 2023.
11	Code cl C.7.1(d)ii EMP s3.9, 7.5 & Appendix 13	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	The Waste and Wastewater Management Plan of the approved EMP includes the required clause.
12	Code cl D.5.9.2(c) EMP s3.10 & Appendix 17	Emissions from exploration, well construction (including during flowback) and workovers must be measured and reports submitted.	Compliant	2022-2023 Emissions Report emailed to onshoregas.DEPWS@nt.gov.au 29 September 2023

No	Reference	Requirement	Performance Status	Evidence
		<i>Note: the interest holder must provide to DEPWS a report on actual versus predicted greenhouse gas emissions in the EMP, and cumulative emissions.</i>		
13	Code cl D.5.9.3(a) EMP s3.10 & Appendix 17	Where natural gas is vented or flared at a gas processing or other downstream facility, emissions must be estimated and reported.	<i>Not Applicable</i>	No gas processing or other downstream facility occurs under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
14	Reg 33 EMP s.5.1	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.	<i>Not Applicable</i>	No reportable incidents occurred under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
15	Reg 34 EMP s.5.1	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/cleanup of the affected area.	<i>Not Applicable</i>	No reportable incidents occurred under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
16	Reg 35 EMP s8.2	A written report of all recordable incidents must be provided to DEPWS not later than 15 days after the 90 day reporting period (unless otherwise agreed).	Compliant	All recordable incidents were provided to DEPWS no later than 1 days after the 90 day reporting period. Reports were submitted on the below dates: Q4 October 2022- December 2022 emailed by Charles Dack Q1 January 2023 – March 2023 emailed by Charles Dack

No	Reference	Requirement	Performance Status	Evidence
				Q2 April 2023 – June 2023 emailed to DEPWS 14 July 2023 by Sophie Hagan Q3 July 2023 – September 2023 emailed to DEPWS 12 October 2023 by Rachel Leembruggen
17	Reg 37A EMP Appendix 06	A report about flowback fluid from hydraulic fracturing must be provided to the Minister within 6 months of the flowback occurring.	<i>Not Applicable</i>	No hydraulic fracturing occurred under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
18	Reg 37B EMP Appendix 06	A report about produced water from hydraulic fracturing must be provided to the Minister within 6 months of the produced water being extracted.	<i>Not Applicable</i>	No hydraulic fracturing occurred under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.
19	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, ³ drilling, or seismic surveys.	<i>Not Applicable</i>	No construction, drilling or seismic surveys occurred under IMP 2-6 during the AEPR reporting period of 1 October 2022 to 30 September 2023.

³ Note, civil works are also considered 'construction' activities.

3. Overall Performance

3.1. Overview of performance

Table 5 provides a summary of the results of the compliance assessment against the 70 total compliance items.

Table 5: Performance Summary

Compliance Indicator	Number	Percentage
Compliant	27	39%
Not Compliant	0	0%
Not Applicable	43	61%