ntepa Northern Territory Environment Protection Authority

Onshore Petroleum Activity – NT EPA Advice

SWEETPEA PTY LTD (SWP2-2) – ENVIRONMENT MANAGEMENT PLAN (EMP) FOR CIVIL AND WATER BORE DRILLING EP136, BEETALOO SUB-BASIN NT

BACKGROUND

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

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

- whether the EMP is appropriate for the nature and scale of the regulated activity to which the EMP relates (regulation 9(1)(b))
- whether the EMP demonstrates that the activity will be carried out in a manner by which the environmental impacts and environmental risks of the activity will be reduced to a level that is as low as reasonably practicable and acceptable (regulation 9(1)(c))
- the principles of ecologically sustainable development sustainable development (regulation 2(a)), as set out in sections 18 to 24 of the *Environment Protection Act 2019*, and
- any relevant matters raised through the public submission process; for this EMP, no public consultation was required.

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	Sweetpea Petroleum Pty Ltd
Petroleum interest(s)	Exploration Permit 136 (EP136)
Environment Management Plan (EMP) title	Civil and Water Bore Drilling Environment Management Plan EP136 - Beetaloo Sub-Basin, NT
EMP document reference	SWP2-2
Regulated activity	The EMP proposes civil works to construct five exploration lease pads in the northern section of EP136 on Tanumbirini Station, with associated access tracks, gravel pits and groundwater monitoring bores. EP136 is located approximately 300 km south-east of Katherine in the Beetaloo Sub-basin. The regulated activity is as follows:

	• Land and vegetation clearing (~140 ha) to allow construction of five lease pads, access tracks and gravel pits • Use, maintenance and upgrade (where required) of the existing pastoral access track as the main arterial track into the permit area • Repurpose sections of existing seismic lines (~22 km) off the main arterial track to the lease pads for access tracks • Construction of five lease pads, including water tank pads and access tracks • Installation of up to a maximum of 42 groundwater bores • Groundwater extraction (~330 ML over four years) at the lease pads and camp for civil construction operations (extraction under an approved water extraction licence under the NT *Water Act 1992*) • Resource extraction of up to 12 gravel pits to support the construction of access tracks lease pads and an accommodation camp • Minor works ancillary to those mentioned above including routine ongoing monitoring and maintenance of infrastructure and or services. Progressive rehabilitation of the main access tracks, laydown yards and drill pads will occur over the duration of the exploration program. Gravel pits will be rehabilitated within 12 months of completion of the exploration activities.
Public consultation	Public consultation on the EMP was not required under regulation 8A(1)(b); as the EMP does not propose drilling or hydraulic fracturing.

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 a clear format. The technical works program in EP136 includes civil construction and groundwater bore drilling activities commencing in mid-2021 and continuing over a four year period until 2024. The total footprint (and land clearing of native vegetation) for the activity across EP136 is 140 ha. The breakdown is five exploration lease pads (55 ha), twelve gravel pits (27.3 ha), one gravel pit camp (5.3 ha) and gravel pit access tracks (6.3 ha). The information from the groundwater monitoring bores will contribute to understanding of the aquifers where the regulated activity is proposed and complement the larger monitoring program occurring as part of SREBA and the development of a water allocation plan for the Beetaloo sub-basin. Table 1 provides an overview of the key components of the regulated activity.

Table 1: Key components of the proposed Sweetpea civil works and water bore drilling program

COMPONENT	REGULATED ACTIVITY
Groundwater extraction licence	Licences pending
Total area of exploration lease (EP136)	4,181 km^2
Number of lease pads	5
Number of groundwater monitoring bores	24
Number of extraction bores	14
Number of gravel pits	12
Number of creek crossings	2
Timing of works	Seasonal over 2021-2024 (commencing Q3 2021)
Camp capacity and workforce (per camp)	50 to 60 persons
Peak traffic movements (per day)	~56 (during bore works and camp establishment)
Estimated total groundwater usage (ML)	~330
Estimated potable water usage (ML)	~0.84 (at 0.001ML /day)
Diesel (kL)	2402
Greenhouse gas emissions (tCO_2-e)	~17,464
Rehabilitation (ha)	~93

The proposed accommodation camp is located within neighbouring exploration permit EP161. Sweetpea has applied for, and DITT is currently managing, the grant of access authorities under the *Petroleum Act 1984* for the areas outside EP136.

A progressive rehabilitation plan (Appendix F) has been developed for the activity, to minimise the risk of site erosion and return the disturbed land to the original conditions long term, in accordance with clause A.3.5 of the Code.[1] Progressive rehabilitation will occur during the life of the works. Overall land clearing and subsequent rehabilitation efforts will be limited by using existing pastoral/access tracks and existing cleared areas for the accommodation camp.

Information on the location and scale of the proposal is included in the EMP. The existing environment has been adequately described through baseline surveys and is suitably understood. There are no areas of high conservation value in the vicinity of the regulated activity. Areas of cultural significance were identified within the activity area. These will be protected through:

- the implementation of restricted work area protocols, in accordance with the provisions outlined in the Aboriginal Areas Protection Authority (AAPA) Authority Certificate[2]
- inductions of all site personnel
- cultural monitoring during clearing
- implementation of an "unexpected finds" procedure.

The interest holder has identified the impacts and risks associated with the regulated activity (43 in total). Mitigations outlined in the risk register, Appendix E are classified based on the hierarchy of controls, and impacts and risks should be reduced to an acceptable level through the proposed mitigation and management measures. Environmental performance standards and measurement criteria have been provided in the EMP (section 7).

The level of detail and the quality of information provided in the EMP is sufficient to inform the evaluation, assessment and management of environmental impacts and risks, and meets the approval criteria under Regulation 9 for the Minister's decision about approval of the environment management plan.

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

2.1 Decision-making principle (s 18 *Environment Protection Act 2019*)

The revised EMP adequately assesses the environmental impacts and risks associated with the regulated activity and outlines appropriate avoidance and mitigation measures. The regulated activity for EP136 is of a small scale. The regulated activity will be a component of longer-term decision making on development of a petroleum resource.

The impacts/risks and control measures associated with the civil and water bore construction activities have been assessed as low risk if carried out in accordance with the mitigations and controls proposed in the EMP. Wet season contingencies and controls are proposed to mitigate potential erosion and sediment impacts from construction activities and disturbed areas. These controls have been assessed by NT Government agencies and deemed adequate.

The communications log reflects ongoing stakeholder communications in respect to the regulated activity covered under this EMP. The interest holder has demonstrated ongoing stakeholder engagement in the EMP as required by the Regulations with landholders and land managers, traditional owners, the Northern Land Council (NLC) and NT Government agencies.

[1] Code of Practice: Onshore petroleum activities in the Northern Territory
[2] Sweetpea has applied for a variation (202101768) on a pervious AAPA certificate (C2020/072) for exploration works in EP136.

2.2 Precautionary principle (s19 *Environment Protection Act 2019*)

The NT EPA considers there is a low risk of serious or irreversible damage from the regulated activity. The regulated activity will be conducted in compliance with the Code, and the EMP provides measurable performance standards to ensure that environmental outcomes are met.

The risk assessment clearly classifies the hierarchy of controls for the mitigations applied to each risk (e.g. eliminate, substitute, engineering, administrative, personal protective equipment). Uncertainty in relation to the environmental features was assessed, with no areas of environmental uncertainty identified.

The interest holder has adopted mitigation controls for bushfire management and ecological protection as used by other petroleum companies who have undertaken similar works in the Barkly Region during this time of the year. These include cleaning out of engine bay on machinery regularly; having a water cart on hand permanently during civil construction to extinguish any fires; and carrying additional fire extinguishers.

Measures for managing risks during wet season operations include a commitment to conduct civil construction activities during the dry season where possible; disturbed ground surfaces to be stabilised before the onset of the monsoon with controls established during October; a wet weather contingency plan implemented where activities extend into the wet season; and inspection of all disturbed areas before and after the wet season. In addition, the NT EPA has recommended the interest holder provide to DEPWS an updated schedule of works; daily progress reports; five-day activity forecasts for the duration of the activity, and immediate written notification to DEPWS of any halt to the regulated activity due to the early onset of the wet season.

The NT EPA is of the view 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 and a satisfactory scientific basis to assess potential impacts and risks. In addition, the environmental monitoring commitments contained in the EMP are compliant with the Code and should provide performance measures to ensure that the environmental objectives are met.

2.3 Principle of evidence-based decision-making (s20 *Environment Protection Act 2019*)

The EMP proposes civil construction activities, including water monitoring bore drilling activities are planned to commence during the dry season in 2021 and continue over a four-year period to 2024. Civil construction timing will be during the dry season wherever possible and wet weather contingencies to be implemented if activities continue into the wet season (October to April inclusive).

A certified Erosion and Sediment Control Plan (ESCP) (Appendix K) contains design and management controls to mitigate potential erosion under sheet flow conditions. Elevation plans and layout for the groundwater monitoring pads and the pad access tracks are provided in the ESCP.

A traffic impact assessment has been reviewed by the Department of Infrastructure, Planning and Logistics (DIPL) (Appendix L). Traffic impacts, including traffic flow and composition have been assessed to be negligible, with the worst-case scenario within the capacity of the Carpentaria Highway and Barkly Stock Route. The interest holder has considered additional mitigations controls and guidance for single lane access.

The NT EPA has assessed the potential for spills from chemicals and hydrocarbons (e.g. diesel) stored in designated bunded areas at the accommodation camp and on the exploration lease pads. The mitigation controls described in the EMP include: portable bunds; containment of hydrocarbons in double-lined diesel storage tanks in accordance with Australian Standard 1940:2004; and spill prevention and response procedures for hazardous spill prevention, monitoring, assessment, response and clean-up. Predicated waste volumes and disposal methods are detailed in the EMP (Table10).

The interest holder has committed to report incidents of any chemical spills >10 L or hydrocarbon spills >20 L (section 7.6.3). Further, NT EPA has recommended the interest holder provide DEPWS

with a written report of any contaminant incidents exceeding 200 L, within 24 hours of the incident being detected.

The NT EPA is of the view that the evidence-based decision-making principle has been considered in assessing the regulated activity.

2.4 Principle of intergenerational and intra-generational equity (s21 *Environment Protection Act 2019*)

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

The GHG emissions from the activity is approximately 17,464 tonnes of carbon dioxide equivalent (tCO_2-e), generated, comprising approximately 10,795 tCO_2-e from land clearing and 6,668 tCO_2-e from diesel combustion. The greenhouse gas emissions are not considered significant when considering that this represents approximately 0.08% of the 2019 NT estimated GHG emissions (20.6 million tCO_2-e).[3]

The regulated activity will be subject to requirements of an Aboriginal Areas Protection Authority (AAPA) Authority Certificate and cannot be approved until this Certificate is obtained. Protection of cultural interests is achieved through compliance with the requirements of the Authority Certificate, including restricted work zones. Additional controls to minimise disturbance to archaeological heritage include: design of access to lease pads to have the minimal impact on Newcastle Creek by using existing crossing; implementation of an "unexpected finds" procedure; and collaboration with the NLC for the employment of two cultural monitors for the duration of the clearing and land disturbance activities.

The interest holder has identified relevant stakeholders and carried out stakeholder engagement in accordance with regulation 7. Interactions between the regulated activity and pastoral operations have been assessed; the interest holder is committed to regular engagement with pastoralists via progress updates.

The NT EPA considers that environmental values will be protected in both the short term and long term, 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 (s22 *Environment Protection Act 2019*)

Sweetpea will obtain a water extraction licence to conduct activities under this EMP. The intended groundwater bores to be used will be located at each lease pad location. Groundwater take will be metered; the combined total of groundwater from all sources is approximately 330 ML, comprising approximately:

- 1.4 ML for the installation of groundwater monitoring bores
- 9.6 ML for camp operations over the four-year program
- 7 ML for camp construction
- 35 ML for access track construction
- 54 ML for track and pad maintenance
- 222.6 ML for construction of well pads, tank pads and monitoring bore pads.

The interest holder has assessed the cumulative impacts of future groundwater use over the four-year exploration program (331 ML/0.3 GL). The Georgina Basin (which includes the Gum Ridge and Anthony Lagoon Formations) has a recharge rate of 60-177 GL/year, and an estimated storage

[3] Source: DISER 2020. *State Greenhouse Gas Inventory*. https://ageis.climatechange.gov.au/SGGI.aspx.

capacity between 1,819,000 and 3,690,000 GL[4]. Based on these data, the proposed extraction will be well within the annual recharge rate (and sustainable yield) of the Basin's aquifers.

The interest holder has demonstrated a commitment to reuse, recycle, and minimise the use of natural resources wherever possible, without introducing significant environmental impacts and risks.

Land disturbance will be limited and avoid large trees and/or culturally and environmentally sensitive areas. All disturbed land will be rehabilitated immediately after the activity to minimise erosion and promote early regeneration of the natural vegetation.

2.6 Principle of conservation of biological diversity and ecological integrity (s23 *Environment Protection Act 2019*)

The EMP for the regulated activity has been informed by two separate field surveys in November 2019 and May 2020. These surveys are supplemented by on-ground field assessments, observations via helicopter, detailed desktop analysis incorporating a variety of sources and historical surveys (2004 – 2018), and anecdotal evidence (Appendix C).

The survey area lies within the Beetaloo Land System, which consists of gently undulating lateritic plains and rises of lateritic red earths and podzolic soils dominated by *Acacia shirleyi* (Lancewood) forest.

There are no threatened vegetation communities listed or likely to occur within the survey area.

Several areas of conservation significance occur within the vicinity of the proposed survey area, including:

- Bullwaddy Conservation Reserve: located 20 km to the west of the civil construction and water bore area
- Lake Woods: approximately 140 km south-west of the permit area

The EMP identifies 21 fauna species listed as threatened under the EPBC Act and/or the TPWC Act. An assessment of the likelihood of occurrence indicates five listed threatened species that are likely to occur based on habitat suitability and previous records:

1. Gouldian Finch *Erythrura gouldiae* (Endangered EPBC Act, Vulnerable TPWC Act).
2. Grey Falcon *Falco hypoleucos* (Vulnerable TPWC Act).
3. Crested Shrike-tit (northern) *Falcunculus frontatus whitei* (Vulnerable EPBC Act, Near Threatened TPWC Act).
4. Painted Honey Eater *Grantiella picta* (Vulnerable EPBC Act, Vulnerable TPWC Act).
5. Yellow-spotted Monitor *Varanus panoptes* (Vulnerable TPWC Act).

The EMP also identifies an additional 20 migratory and marine bird species either likely (four), possibly (10) or possibly (six) occurring in the area.

The DEPWS Flora and Fauna Division is satisfied that that the regulated activity does not pose a significant risk to threatened species, important habitats or significant vegetation types, including areas of conservation significance in the vicinity. Further, the mitigation controls identified in the EMP are adequate to reduce risks associated with vehicle strike, dust, erosion and/or spills to as low as reasonably practicable, in relation to potential impacts on biodiversity. This includes clearing for the activity avoiding riparian vegetation and additional disturbance to watercourses, and avoiding

[4] Tickell, SJ & Q Bruwer, 2019. Georgina Basin Groundwater Assessment: Daly Waters to Tennant Creek. Water Resources Division, Report 17/2017 (Version 2, April 2019).

larger trees with trunk diameters greater than 25 cm at 1.3 m above the ground to minimise disturbance to potential nesting trees.

The interest holder has committed to providing geospatial files of surface disturbance to DEPWS before, during and after disturbance from construction activities, and then at intervals of 6 months, 1 year and 2 years until rehabilitation is determined successful and complete. The NT EPA has recommended the interest holder provide to DEPWS an updated rehabilitation plan, concurrent with submission of the annual environment performance report.

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

Specific examples of mitigation controls include training for all personal on the use of protective equipment and bushfire awareness; daily inspections of all machinery and vehicles for any trapped vegetation that may cause a spark or ignite a fire; visual inspection and dry removal of debris; six-monthly weed inspections completed on all activity areas to reduce the spread of weeds; and ensuring that all equipment is cleaned and has valid weed hygiene declarations prior to accessing pastoral properties.

The NT EPA considers that implementation of the EMP for the regulated activity should ensure the conservation of biological diversity and ecological integrity.

2.7 Principle of improved valuation, pricing and incentive mechanisms (s24 *Environment Protection Act 2019*)

The interest holder will be 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 progressive rehabilitation of all disturbed areas to an acceptable standard, will be at the cost of the interest holder.

The interest holder is required to provide an adequate environmental rehabilitation security bond to indemnify the NT Government. This is based on an assessment by DEPWS of the estimated rehabilitation cost submitted by the interest holder. The rehabilitation costs for the regulated activity is supported by independent contractor quotes.

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. Does the EMP demonstrate that the activity will be carried out in a manner by which the environmental impacts and environmental risks of the activity will be reduced to a level that is as low as reasonably practicable and acceptable (regulation 9(1)(c))

The interest holder has undertaken measures to avoid impacts on environmental values, informed by a detailed understanding of site conditions, obtained through baseline studies and surveys conducted on EP136.

The EMP demonstrates a systematic identification and assessment of environmental impacts and risks associated with the regulated activity. The key environmental impacts and risks considered in the EMP are:

- impacts to flora and fauna resulting from civil works, including vegetation clearing, vehicle movements, fire, weeds and erosion
- impacts to soil resulting from the use of heavy machinery, including soil compaction, potential spills, leaks and loss of containment of chemicals/hydrocarbons during transport, storage and use
- impacts to cultural heritage/scared sites resulting from clearing, fire and movement of heavy machinery
- impacts to surface water quality, resulting from clearing in the vicinity of creek crossings (erosion and sedimentation), spills of chemicals or hydrocarbons, flooding
- negligible contribution to greenhouse gas emissions from combustion of fuel and land clearing
- impacts to groundwater resulting from contamination or pollution from waste; impacts to Groundwater Dependent Ecosystems (including stygofauna); and reduced yield of pastoral bores.

Cumulative impacts to greenhouse gas emissions, groundwater, surface water, conservation significant flora and fauna, visual amenity and generation of waste were also considered.

The EMP has considered the hierarchy of controls (elimination, substitution, engineering, administration) and demonstrated that the controls to be implemented are considered ALARP. All of the 43 environmental risks identified by the interest holder are considered 'low' risk, and therefore are ALARP. The interest holder has included justification as to why no further controls can be implemented and therefore this aspect can be considered as ALARP. For example:

1. Although assessed as a low risk, fire from heavy machinery ignition sources during clearing, could adversely impact flora, fauna and cultural heritage if it spreads uncontrollably. The interest holder has committed to complying with total fire ban days; carrying sufficient fire extinguishers; regularly cleaning the undercarriage of machinery to minimise the build-up of debris on ignition sources; having a water cart within 100 m of civil construction activities; and reviewing the NAFI website each day prior to the commencement of any works.

2. Damage to, or loss of, culturally significant artefacts, areas or species has been assessed as a low risk. The civil construction and water bore activities do not occur within, or close to, sacred sites making it highly unlikely that these areas will be impacted. The interest holder will conduct activities to avoid the sacred sites and meet the conditions stipulated for Restricted Work Areas. The interest holder has committed to: site inductions for all personnel to ensure they are aware of culturally sensitive aspects within the project area; implementation of an "unexpected finds" procedure; and using two cultural heritage monitoring personnel during civil construction activities.

The measures provided are appropriate to the nature and scale of the activity, and if implemented, the residual risk to the environment is likely to be acceptable.

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. The NT EPA considers that the environmental impacts and risks will be reduced to an acceptable level, considering the sensitivity of the local environment, relevant standards and compliance with the Code.

4. Other relevant matters

Regulation 9 requires that an EMP provides a comprehensive description of the regulated activity, including provision of a detailed timetable for the activity. The EMP includes a schedule (Table 7), outlining the sequencing of works. The NT EPA has provided advice that the interest holder be required to submit an updated timetable for the regulated activity prior to commencement. The timetable should address all aspects of the activity and include, but not be limited to, dates for the implementation of commitments and should be updated monthly or as other constraints, such as seasonal weather forecasts or travel restrictions emerge.

CONCLUSION

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

- is appropriate for the nature and scale of the regulated activity
- demonstrates that the regulated activity can be carried out in a manner such that the environmental impacts and risks of the activity will be reduced to a level that is as low as reasonably practicable (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 EMP for Sweetpea Petroleum Pty Ltd Civil and Water Bore Drilling EP136 be approved, the following conditions be considered:

Condition 1: The interest holder must submit to DEPWS:

i. an updated timetable (including time-bound commitments) for the regulated activity prior to commencement of the activity and each month thereafter

ii. weekly on-site reports indicating the status and progress of the groundwater bore installation, progressive rehabilitation completed and fire damage

iii. written notification of any halt to the activity due to early onset of the wet season, within 24 hours of taking action; and

iv. notification of any fires potentially threatening the works.

Condition 2: In the event of any accidental release (overflow, failure, spill or leak), to ground of contaminants that exceeds 200 L, the interest holder must provide a written report to DEPWS Petroleum Operations within 24 hours of the incident was detected. The report must include:

i. details of the incident specifying material facts, actions taken to avoid or mitigate environmental harm

ii. the corrective actions taken including the volume and depth of impacted soil removed for appropriate disposal if required, and

iii. any corrective actions proposed to be taken to prevent recurrence of an incident of a similar nature.

Condition 3: 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. The first report must cover the 12 month period from the date of the 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.

Condition 4: To support clause A.3.9 of the Code and the EMP rehabilitation plan, the interest holder is to provide an updated rehabilitation plan to DEPWS for approval, concurrent with submission of the annual environment performance report. The amended rehabilitation plan must include:

i. auditable success criteria for rehabilitation and corrective actions in the event rehabilitation monitoring shows success criteria are not achieved

ii. an annual summary of progressive rehabilitation outcomes, and

iii. be accompanied by geospatial files of all surface disturbance areas, including those under rehabilitation.

Progressive rehabilitation of significantly disturbed land, not required for the ongoing conduct of future activities, must commence as soon as practicable but no longer than 12 months following cessation of the activity.

The rehabilitation plan must be implemented until a successful outcome is achieved and documented.

Condition 5: To support clause D.6.2 (b) of the Code, an emissions report must be provided to DEPWS by 30 September each year, which summarises actual greenhouse gas emissions reported under the Australian Government's *National Greenhouse and Energy Reporting Act 2007* versus the predicted emissions in the EMP.

Condition 6: The Code of Practice Section A.3.2 (Well pad site selection requirements) states that *'Interest holders must minimise the surface footprint of wells and the impact on landscape amenity'*. In that regard, Sweetpea must conduct land clearing for lease pads sequentially, and as required, including in conjunction with the installation of a monitoring bore associated with a lease pad.

PAUL VOGEL AM

CHAIRPERSON

NORTHERN TERRITORY ENVIRONMENT PROTECTION AUTHORITY

21 JUNE 2021