



Annual Environmental Performance Report

Palm Valley Gas Field
Field Environmental Management Plan

August 2020

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Signature and Certification

We hereby declare that the information provided in this annual environment performance report and accompanying documents is to the best of our knowledge, true and correct.	
Signature	
Name	Ross Evans
Position	Chief Operating Officer
Date	15 September 2020

Glossary

Abbreviation / Acronyms	Definition
AAPA	Aboriginal Areas Protection Authority
AEPR	Annual Environment Performance Report
CoP	Code of Practice
CP	Central Petroleum Limited
CTP	Central Treatment Plant
DENR	Department of Environment and Natural Resources
DAWE	Department of Agriculture, Water and Environment
DIPL	Department of Infrastructure, planning and Logistics
DPIR	Department of Primary Industry and Resources
DTSC	Department of Tourism, Sport and Culture
EMP	Environmental Management Plan
EPA	Environment Protection Authority
EPS	Environmental Performance Standard
FEMP	Field Environment Management Plan
GIS	Geographic Information System
HSE	Health, Safety and Environment
NEMP	National Environment Management Plan
NLC	Northern Land Council
NORMS	Naturally Occurring Radioactive Materials
NT	Northern Territory
OL3	Operating Licence Three
PVGF	Palm Valley Gas Field
TO	Traditional Owner

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1.0 Introduction

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

The report includes sufficient information to allow the minister to assess CP's compliance with the obligations described within the PVGF Environmental Management Plan approved 15 February 2019 and any other law in force in the Northern Territory related to conduct of the regulated activity.

The AEPR covers the period from 15 February 2019 to 14 February 2020, being the 12-month period from the earliest approval date for the EMPs listed above. Activity was undertaken at the Palm Valley Gas Field (PVGF) continuously during the reporting period.

1.1 Background

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

- Gas production, processing and transfer via pipeline
- Civil maintenance including road, tracks and lease maintenance
- Repair, maintenance of gathering flowlines and associated equipment
- Shutdown maintenance activities including cold venting
- Routine well head maintenance and function testing
- Routine wireline activities as listed in the approved Reservoir Management Plan
- Operations repair and maintenance of existing facilities
- Pipeline and flow line operations, maintenance and repair including pigging
- Maintenance and repairs of existing processing facilities including the direct replacement of obsolete or irreparable equipment
- Grey water and waste water system maintenance
- Fuel and chemical storage, handling and transportation
- General waste management
- Weed control
- Maintenance of erosion and sediment controls

The location of the PVGF is shown in Figure 1-1.

1.2 Contents of Performance Report

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

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

The Code of Practice: Onshore Petroleum Activities in the Northern Territory (legislated 11 June 2019) was after the approval of the PVGF EMP and therefore is not applicable to the activities in the EMP.

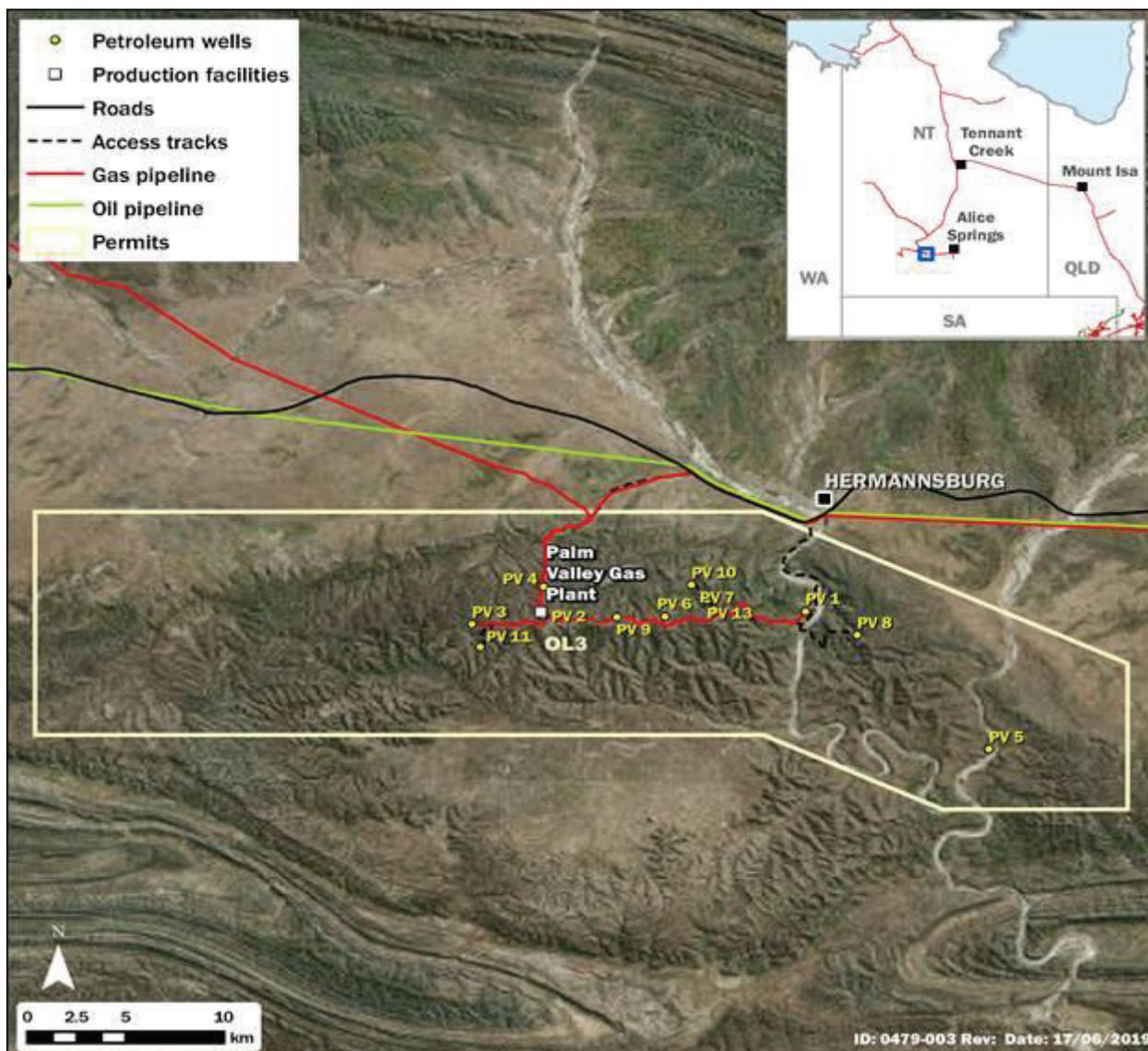


Figure 1-1 Palm Valley Gas Field Location

1.3 Assessment of Compliance

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

Table 1-1 Compliance Descriptors

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

1.4 Evidence of Compliance

The following sources of evidence are used to demonstrate compliance:

1. Internal tracking of compliance by CP through:
 - Inspections, as committed to in the EMP, as follows:
 1. PVGF EMP
 - Our incident management system records
 - Quarterly environmental inspections
 2. March, June, September, December 2019 and March 2020
 - Area and lease inspection reports
 - Work management and maintenance system records
 - Daily production reports
 - Various registers in place including:
 - animal control, waste, hazardous goods, chemical, weed control
 - External annual audits of compliance as follows:
 - PVGF FEMP audits, conducted in December 2019
2. Reports provided under the National Greenhouse and Energy Reporting Act
3. Outcome from regulatory inspections conducted by the Department of Environment and Natural Resources (DENR), Petroleum Operations
4. Recordable and reportable incident reports submitted to DENR Petroleum Operations
5. Reports provided to DENR, the Department of Primary Industries and Resources (DPIR) and other government agencies.

2.0 Demonstration of Compliance

2.1 Ministerial Approval Conditions

The PVGF FEMP was approved by the Minister for Primary Industry and Resources on 15 February 2019 with conditions, which are assessed for compliance in Table 2-1.

Table 2-1 Compliance with Ministerial EMP Approval Conditions

No	Ministerial Condition	Compliance Status	Evidence
1	2(a) Determination of an environmental security in a form accepted by the Department of Primary Industries and Resources to be submitted no later than 14 March 2019	Compliant	DIPR and DENR agreed to extend this date to 7 October 2019. CP engaged an independent civil engineering and resource industry services company, to develop an estimate for end-of-life closure and rehabilitation based on their own and industry rates for demolition, waste removal and disposal, and site rehabilitation. Central submitted these estimates and a proposed environmental security to DENR in August 2019.
2	2(b) The quantum of the security determined under condition 2(a) is to be submitted and received by the department on or before 12 June 2019 or as agreed to by the Department of Primary Industries and Resources	Compliant	The quantum of security is still to be determined. CP had a meeting with DIPR and DENR on 10 July 2020 to resolve, however we are currently awaiting advice.
3	2(c) A plan for the appropriate removal and disposal of the accumulated salts / sediments from the PV9 evaporation pond, is to be submitted to the DPIR on or before 31 May 2019.	Compliant	A plan was submitted to DENR on 31 May 2019 which outlined CP's options and a proposed plan for the accumulated salts / sediments from the PV9 evaporation pond. CP are continuing to engage with DENR regarding the ongoing commitments within the submitted plan especially in regard to the estimated timeframes which have been impacted by COVID-19 restrictions.

2.2 Environmental Outcomes and Environmental Performance Standards

Table 2-2 provides a systematic overview of CP's compliance with the environmental outcomes and environmental performance standards within the approved PVGF FEMP. The environmental outcomes for the PVGF FEMP (as listed in Table 2-2) are sourced from the 'management objectives' in Tables 8-1 to 8-13 of the PVGF FEMP and the environmental performance standards sourced from 'performance measures' in Tables 8-1 to 8-13 of the PVGF FEMP.

Table 2-2 Compliance with Environmental Outcomes and Environmental Performance Standards

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
1	Minimise impacts to ecosystem and human health values, as a result of asset integrity failures during the regulated activities (asset integrity)	No uncontrolled releases	Partially Compliant	<p>Incident management system records identified two incidents involving uncontrolled release of gas into the atmosphere which were reported at the time of the incident:</p> <ol style="list-style-type: none"> On 22 May 2019 at PV13 as a result of a failed level controller in the gas/water separator. This caused water to be drained from the separator, and gas to vent through the water line and into the water storage tanks, subsequently venting from the tank vent. Approximately 10,435 standard cubic metres of gas was released. <ol style="list-style-type: none"> On 8 August 2019 at PV2 as a result of a vessel level control dump valve not closing and intermittently venting small volumes of gas through the water line. Approximately 688 standard cubic metres of gas was released over a 16-hour period until the release was discovered.
		No asset integrity failures	Partially Compliant	
		Keep management of change records	Compliant	CP has a defined management of change process with gated approvals at the various stages. All PV asset related changes during the period followed this process and the outcomes were stored in our document management system.
		Keep asset installation records	Compliant	As built design drawings for PV assets installed as part of the operation were maintained in our document management system.
		Keep records of inspections, monitoring test results and maintenance activities	Compliant	Records of inspections, monitoring outcomes and maintenance activities at PV were recorded in our maintenance system. Any rectification work identified is raised as a work order, managed and closed out in the system.
		Keep training and induction records	Compliant	PV site induction and training records were maintained in a training register maintained by site administrators and the HSE function. Induction materials include content which deals with process safety and asset integrity.
		Maintaining records of emergency response plans	Compliant	Emergency response plans were stored electronically and in hard copy on site. These plans were reviewed regularly as part of emergency exercises.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		<p>Keep records of the leak detection volume</p> <p>Keep records of releases, leaks and associated clean-ups using CP's incident reporting system</p> <p>Monitor wellhead pressure of producing wells</p> <p>Monitor wellhead pressure of non-producing wells</p> <p>Monitor identified water bores annually</p> <p>Routine testing, inspection and preventative maintenance program for gas field infrastructure as per the inspection regime within CP's maintenance management system</p> <p>Monitor plant conditions daily</p>	<p>Compliant</p> <p>Compliant</p> <p>Compliant</p> <p>Compliant</p> <p>Compliant</p> <p>Compliant</p> <p>Compliant</p> <p>Compliant</p>	<p>Incident management systems records confirmed that any incidents involving identified leaks were captured, categorised and assessed within the system.</p> <p>Incident management systems records confirmed that the incidents involving releases, leaks and associated clean-ups were captured, categorised and assessed within the system.</p> <p>Wellhead pressures were monitored in real time through our production management system. In addition, regular lease reviews were undertaken which includes the monitoring well head pressures. These reviews are scheduled, and the outcome recorded in our maintenance management system.</p> <p>Regular lease reviews were undertaken which included the monitoring well head pressures. These reviews are scheduled, and the outcome recorded in our work management system.</p> <p>Monitoring of RN006503 was undertaken in January 2020 with no adverse results noted.</p> <p>The routing testing, inspection and preventative maintenance program for all gas field infrastructure was undertaken as per the schedule and recorded in our maintenance management system.</p> <p>Operators on site and engineers in head office monitor plant conditions daily and the checks and the outcomes are recorded in the maintenance management system.</p>
2	Minimise impacts to ecosystem and human health values, as a result of conducting the	<p>No uncontrolled releases of chemicals and hazardous materials</p> <p>No incorrect storage and use of chemicals and hazardous materials</p>	<p>Partially Compliant</p> <p>Compliant</p>	<p>See comments in 'environment outcome 1' in relation to uncontrolled releases of chemicals and hazardous materials.</p> <p>Area / environmental inspections and incident management system records did not identify any instances of the incorrect storage or use of chemicals or hazardous materials</p>

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	regulated activity (chemicals and hazardous materials)	Maintain a hazardous materials register	Compliant	The details of all hazardous chemicals on site are maintained in a chemical register which details the quantities of hazardous chemicals stored on site. The register is updated with the movement of chemical in and out of site.
		Keep records of inspections, monitoring test results and maintenance activities	Compliant	Records of inspections, monitoring outcomes and maintenance activities are recorded in our maintenance system. Any rectification work identified is raised as a work order, managed and closed out in the system.
		Keep training and induction records	Compliant	PV site induction and training records are maintained in a training register maintained by site administrators and the HSE function. Induction materials include content which deals with chemicals and hazardous materials.
		Keep records of releases, leaks and associated clean-ups using CP's incident reporting system	Compliant	Incident management systems records confirmed that the incidents involving releases, leaks and associated clean-ups were captured, categorised and assessed within the system.
		Routine visual inspections on a weekly basis of storage areas to ensure no spills or leaks	Compliant	Weekly area inspections were undertaken of chemical storage areas, waste storage areas to check bunding, containment systems. Any non-compliance would be recorded as an incident in the incident management system, records did not identify any instances where bunding and containment strategies were deficient.
		Visual inspections on a quarterly basis to ensure adequate bunding and containment strategies implemented	Compliant	Regular area / quarterly environmental inspection records confirmed that inspections were conducted. Any non-compliance would be recorded as an incident in the incident management system, records did not identify any instances where bunding and containment strategies were deficient.
		Monitor emergency response drills monthly	Compliant	Emergency response exercises are scheduled in the work management system to be undertaken every 6 weeks. The completion of the emergency response exercises is captured and reported in regular monthly HSE reports. The results of the exercises are also captured in our maintenance management system.
		Groundwater monitoring on an annual basis	Compliant	Monitoring of groundwater using RN006503 was undertaken in January 2020 with no adverse results noted.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
3	Minimise impacts to ecosystem and human health values during the regulated activity (produced water management)	No asset integrity failures	Compliant	Incident management system records did not identify any incidents involving asset integrity failures related to produced water management.
		No uncontrolled releases of produced water	Compliant	Incident management system records did not identify any incidents of uncontrolled releases of produced water.
		Keep management of change records	Compliant	CP has a defined management of change process with gated approvals at the various stages. All PV changes involving produced water during the period followed this process and the outcomes were stored in our document management system.
		Keep asset installation records	Compliant	As built design drawings for PV produced water assets installed as part of the operation were maintained in our document management system.
		Keep records of inspections, monitoring, testing and maintenance	Compliant	Records of inspections, monitoring outcomes and maintenance activities at PV related to produced water systems were recorded in our maintenance system. Any rectification work identified is raised as a work order, managed and closed out in the system.
		Keep records of emergency response plans	Compliant	Emergency response plans were stored electronically and in hard copy on site. These plans were reviewed regularly as part of emergency exercises. Plans include spill response scenarios.
		Keep records of releases, leaks and associated clean-ups using CP's incident reporting system	Compliant	Incident management systems records confirmed that the incidents involving releases, leaks and associated clean-ups were captured, categorised and assessed within the system.
		Conduct daily routine readings of wellhead tank liquid levels	Compliant	Daily inspections of wellhead tank liquid levels were undertaken and recorded in the maintenance management system.
		Visually inspecting evaporation ponds weekly to ensure sufficient freeboard for produced water storage	Compliant	Weekly inspections were undertaken at the evaporation ponds to ensure sufficient freeboard for produced water storage. The results of the inspections are recorded in the maintenance management system.
		No domestic waste remaining onsite at completion of activities	Not Applicable	Activities at the operation are ongoing, therefore the EPS was not triggered.
4	Minimise impacts on soil, surface water, groundwater,			

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	sensitive habitat and air quality, minimise creation of food sources or habitat for pest species, minimise waste generation through reduce, reuse, recycle programs, during the regulate activity (waste management)	No unregulated waste handling	Compliant	Incident management system records did not identify any incidents involving unregulated waste handling. All waste stored on, removed from and disposed of is recorded in a waste register which includes the date of removal, type of waste, whether it is listed, volume of waste, who removed it and its destination.
		Pest species will not be encouraged to site	Compliant	Regular area inspections, animal register and incident management system records did not identify any instances of the introduction of or any increase pest fauna numbers on site.
		Naturally Occurring Radioactive Materials exposure is understood and a management plan in place	Compliant	There is a NORMs management plan in place and a trained and accredited officer who provides guidance, manages the process and consults on any potential exposures.
		Maintaining a waste register	Compliant	The details of all waste stored on site are maintained in a waste register which details the stored quantities.
		Maintaining waste disposal records including all waste certificates to be noted and accounted for	Compliant	All waste removed from site and disposed of was recorded in a register which includes the date of removal, type of waste, whether it is listed, volume of waste, who removed it and its destination. Waste certificates have also been maintained for the listed waste transported interstate.
		Maintain records of waste storage site inspections	Compliant	Inspections of waste storage areas to check bunding, containment systems and potential spills and leaks were included in regular areas inspections, quarterly environmental inspections and annual audits.
		Keeping Naturally Occurring Radioactive Materials testing records	Compliant	Record of all testing performed on an annual and ad hoc basis are recorded in the NORMS register.
		Visual weekly inspections of waste receptacle to ensure no fauna access to waste storage locations, lids are secure, waste are appropriately stored and there are no leaks	Partially Compliant	Regular area inspections records confirmed that inspections were conducted to confirm lids are secure, waste are appropriately stored and there are no leaks. Any non-compliance would be recorded as an incident in the incident management system, records did not identify any instances where waste receptacles did not have secure lids to prevent fauna access / interference. However, checks were no performed weekly as indicated they were only undertaken on a monthly basis.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		<p>Monthly audit of the waste register to ensure all waste removal is appropriately captured and recorded</p> <p>Soil sampling directly after clean-up at any location where a spill / contamination has occurred as required following incident until soil is classified as remediated in accordance with the NEPM 2013 guidelines for contaminated sites</p> <p>Soil sampling directly after an incident to determine the extent of contamination and following removal of contaminated source as required following incident until soil / water is classified as remediated in accordance with the NEPM 2013 guidelines for contaminated sites and/or appropriate surface water guidelines</p>	<p>Compliant</p> <p>Not Applicable</p> <p>Not Applicable</p>	<p>The waste register is reviewed and updated on a regular monthly basis.</p> <p>Incident management system records did not identify any instances of spills which resulted in contamination of soil; therefore, the EPS was not triggered.</p> <p>Incident management system records did not identify any significant instances of spills which resulted in contamination of soil / water, therefore the EPS was not triggered.</p>
5	Minimise disturbance to land and land use (including soils and terrain, flora and fauna), minimise erosion (via water	<p>Reporting incidents of uncontrolled waste releases using CP's incident reporting system, including corrective actions. Reportable incident records and regulatory notifications will be maintained</p> <p>Land disturbance equal or less than planned</p> <p>Minimum incidences of erosion and sedimentation occurring</p>	<p>Not Applicable</p> <p>Not Applicable</p> <p>Compliant</p>	<p>Incident management system records did not identify instances of uncontrolled waste releases during the reporting period. Records of regulatory reporting are maintained in our document management system.</p> <p>PVGF is currently an operational site and there were no areas disturbance during the reporting period, therefore the EPS was not triggered.</p> <p>Area / environmental inspections and incident management system records only identified minor erosion and sedimentation incidents as a result of operations.</p>

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
<p>or wind) and sediment releases, protection of waterways, and protection of the productivity of land for its intended land use, during the regulated activity (erosion and sediment control)</p>	<p>Areas left safe, stable and non-polluting</p>	<p>Compliant</p>	<p>Environmental / area inspections and incident management system records did not identify any areas being unstable or left in an unsafe state and there were no instances of reportable pollution as a result of operations.</p>	
	<p>Commence to rehabilitate disturbed areas within 12 months of decommissioning</p>	<p>Not Applicable</p>	<p>No areas were decommissioned or planned to be rehabilitated during the reporting period, therefore the EPS was not triggered.</p>	
	<p>Disturbed areas will be returned to a stable landform such that they are returned to a condition as close as practicable to the surrounding areas (or pre-disturbance state) within an acceptable timeframe</p>	<p>Not Applicable</p>	<p>There were no areas disturbance during the reporting period, therefore the EPS was not triggered.</p>	
	<p>No new erosion flow paths originated from site</p>	<p>Compliant</p>	<p>Environmental / area inspections, and incident management system records did not identify any new erosion flow paths as a result of operations.</p>	
	<p>No flow on effects caused by flooding at Central Petroleum's operational sites</p>	<p>Not Applicable</p>	<p>There were no incidents of flooding on site during the reporting period, therefore the EPS was not triggered.</p>	
	<p>Monitoring for soil erosion and related issues during critical stages such as: after completion of a specific phase of activity all disturbed areas inspected for early signs of compaction, erosion and soil degradations (e.g. generation of bulldust); when accessing the site after the wet season look for signs of erosion and if significant impacts are identified remediation may be required prior to continued vehicle access; after more than 20 mm of rainfall</p>	<p>Compliant</p>	<p>Monitoring and recording of erosion and sedimentation controls is part of area / environmental inspections which occur regularly across site in this prior to, during operations. Using data from Hermannsburg Bureau of Meteorology weather station, no records of any rainfall events during operations which would have prompted specific post event visual inspections.</p>	
	<p>Where rehabilitation of a site is undertaken, CP committed to monitoring the rehabilitation until the site is reinstated</p>	<p>Not Applicable</p>	<p>Records indicate that no areas were under rehabilitation which required monitoring during the reporting period, therefore the EPS was not triggered.</p>	

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		<p>Measuring and uploading the extent of disturbances to a Geographic Information System (GIS)</p> <p>Visual site inspections during civil maintenance works to ensure appropriate erosion and sedimentation control measures implemented</p> <p>Visual site inspections following any significant rainfall event (> 10mm in 24 hours) to ensure adequate control devices in place in accordance with DENR and ICEA best practice guidelines</p>	<p>Not Applicable</p> <p>Not Applicable</p> <p>Not Applicable</p>	<p>There were no areas disturbance during the reporting period, therefore the EPS was not triggered.</p> <p>There was no civil maintenance undertaken during the reporting period, therefore the EPS was not triggered.</p> <p>No records of any rainfall events during operations which would have prompted specific visual inspections, therefore the EPS was not triggered.</p>
6	Avoid the introduction of weeds and pest fauna and avoid the spread of existing weeds and pest fauna, during the regulated activity (biosecurity)	<p>No introduction or spread of declared weeds and/or pest fauna resulting from Central Petroleum's activities</p> <p>Conduct ad-hoc spot checks for weed free certification when equipment and materials are mobilised to site from known weed infested areas</p> <p>Conduct quarterly inspections to identify weed outbreaks</p>	<p>Compliant</p> <p>Not Applicable</p>	<p>Regular area inspection and incident management system records did not identify any instances of the introduction of or the spread of weeds on site. The annual weed survey undertaken at PV in 2019 did not identify any increase in declared weeds. Regular area inspection, animal register and incident management system records during operations did not identify any instances of the introduction of or any increase pest fauna numbers on site.</p> <p>No equipment was mobilised to site for operational activities from known weed infested areas, therefore the EPS was not triggered.</p> <p>The inspection of weeds forms part of quarterly environmental inspections undertaken. Incident management system records did not identify any instances of weed outbreaks.</p>
7	Minimise disturbance to flora and fauna, and minimise disturbance to sensitive areas,	<p>OL3 will be monitored to minimise impacts to fauna habitat and sensitive vegetation</p>	<p>Compliant</p>	<p>Area / environmental inspections were undertaken on a regular basis to identify any negative environmental impacts including to fauna habitat and sensitive vegetation areas. Incident management system records did not identify any incidents involving fauna habitat and sensitive vegetation. In addition, no clearing or civil works were undertaken during the reporting period.</p>

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	during the regulated activity (biodiversity)	<p>No native fauna impacts (injury or fatality)</p> <p>No loss of sensitive vegetation resulting from Central Petroleum's activities</p> <p>Maintaining records of disturbance</p> <p>Maintaining records of inspections</p> <p>Recording all biodiversity incidents using CP's incident reporting system with corrective actions initiated</p> <p>Conduct ecological surveys for flora and fauna prior to any civil maintenance</p> <p>Visual inspections twice per year to ensure no disturbance to known slater skink habitat north of PV-02</p>	<p>Compliant</p> <p>Compliant</p> <p>Not Applicable</p> <p>Compliant</p> <p>Not Applicable</p> <p>Not Applicable</p> <p>Partially Compliant</p> <p>Compliant</p>	<p>Incident management system records and the animal control register did not identify any instances of fauna injury or fatalities.</p> <p>Areas / environmental inspections, incident management system records did not identify any incident involving the loss of sensitive vegetation.</p> <p>There were no areas disturbance during the reporting period, therefore the EPS was not triggered.</p> <p>Regular area and environmental inspections were scheduled and undertaken with the records were captured in the work management system and inspection reports. Incident management system records did not identify any incidents of disturbance to flora and fauna.</p> <p>Records of all biodiversity incidents related to operational activities were captured in the incident management system including details of any corrective actions undertaken. However, no biodiversity incidents were identified during the reporting period therefore the EPS was not triggered.</p> <p>There was no civil maintenance undertaken during the reporting period, therefore the EPS was not triggered.</p> <p>Visual inspections were conducted by ecologists in March 2019 and there was no evidence of disturbance / impacts to known slater skink habitat north of PV-02. However, the planned activity only occurred once during the reporting period.</p> <p>Incident management system / routine inspection records did not identify any instances of uncontrolled fires as a result of the operational activities.</p>
8	Minimise risk of causing bushfires, minimise impacts on environmental habitat and fauna, soil erosion, stakeholders, culturally sensitive sites, public	<p>No uncontrolled fires occurring as a result of Central Petroleum's activities</p> <p>Recording all incidents of fire in CP's incident reporting system and corrective actions initiated</p>	<p>Compliant</p> <p>No applicable</p>	<p>Records of all fire incidents related to operational activities were captured in the incident management system including details of any corrective actions undertaken. No fire related incidents were identified during the reporting period therefore the EPS was not triggered.</p>

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	infrastructure and community lands, and to prevent accidental fire risk and ensure safe storage of chemicals, during the regulated activity (bushfire prevention)	Inspect fire control equipment monthly to ensure functionality Inspect fire breaks yearly	Compliant Compliant	Fire control equipment is inspected monthly. Inspections and scheduled and the outcome captured in the maintenance management system. In addition, all equipment is independently inspected by a 3 rd party contractor on a six-monthly basis. The inspection of fire breaks forms part of regular area and environmental inspections undertaken at least quarterly. Records were kept in the maintenance connect system.
9	Minimise environmental nuisance due to dust for sensitive receptors and minimise atmospheric emissions, during the regulated activity (air quality)	No complaints regarding dust/air quality Amicable resolution of complaints Maintaining records of routine inspections for leaks Recording all complaints and subsequent actions in CP's incident reporting system with corrective actions initiated Keep maintenance records of vehicles and equipment as per the inspection regime within CP's maintenance management system Record all venting events during operations as required Record complaints from surrounding land users in regard to air quality or visual amenity when applicable	Compliant Not Applicable Compliant Not Applicable Compliant Compliant Not Applicable	Incident management system records did not identify any instances of complaints as a result of dust or air quality issues. Incident management system records did not identify any complaints therefore the EPS was not triggered. Regular area, quarterly environmental inspections and annual audits were undertaken to inspect areas and facilities to identify leaks. Incident management system records did not identify any instances of complaints during the reporting period therefore the EPS was not triggered. The maintenance management system captures all CP controlled vehicles and equipment and their maintenance records e.g. preventative maintenance schedules and executed activities. No overdue maintenance activities were identified. All venting was captured in the daily production reports. Any uncontrolled venting is estimated and captured as an event in the incident management system. Incident management system records did not identify any instances of complaints related to air quality or visual amenity related to operations therefore the EPS was not triggered.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
10	Minimise impacts upon environmental values of the local community, minimise impacts on cultural heritage, minimise safety risks to the public and other third parties, maintain and enhance partnership with the local community, including local contractors, and no loss to the aesthetic or enjoyment for the community, during the regulated activity (traffic and transport)	<p>Monitor road conditions for dust weekly</p> <p>No issues raised by the community</p> <p>An absence of issues raised by the community will be used as an indicator for successful communication</p> <p>No unresolved complaints</p> <p>The community will be highly consulted, and all comments will be assessed and where viable, recommendations implemented</p> <p>There will be a high level of satisfaction by the community</p> <p>No vehicle accidents</p> <p>Tracking fauna strikes and near misses in the Wild Animal Control Register</p> <p>Maintaining a complaints register</p> <p>Keeping records of stakeholder engagement</p> <p>Keeping records of environmental compliance</p>	<p>Compliant</p> <p>Compliant</p> <p>Compliant</p> <p>Not Applicable</p> <p>Compliant</p> <p>Compliant</p> <p>Compliant</p> <p>Compliant</p> <p>Compliant</p> <p>Compliant</p> <p>Compliant</p>	<p>Infield roads are driven daily, and any poor conditions e.g. corrugation, washouts, dust, etc are reported and captured in the incident management system including details of any corrective actions undertaken. No road condition incidents or hazards were identified during the reporting period.</p> <p>Incident management system records did not identify any instances of complaints from the community.</p> <p>Incident management system records did not identify any instances of complaints from the community.</p> <p>Incident management system records during the period did not identify any instances of complaints therefore the EPS was not triggered.</p> <p>PV stakeholder communications log records indicated CP's continued engagement with identified stakeholders. The register also records all objections / claims from Stakeholder and the response / actions to those objections / claims</p> <p>Records of local community meetings indicate a generally positive response to CP activities and engagement with the community.</p> <p>Incident management system records did not identify any vehicle accidents.</p> <p>An animal control register was used to record any instances of sightings, near misses or strikes as required during the operational activities. No issues were identified during the period.</p> <p>Records of all complaints related to the operation are registered and captured in the incident management system. No records of any complaints as a result of operational activities were identified.</p> <p>PV stakeholder communications log records CP's continued engagement with identified stakeholders during operations.</p> <p>All non-compliance with environmental obligations were captured and recorded in the incident management system and reported as required to the relevant authority.</p>

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		All traffic and transport incidents related to any contamination of the environment, erosion or loss of fauna to be recorded in CP's incident reporting system with corrective actions closed out and recorded	Not Applicable	No incidents were identified during the period therefore the EPS was not triggered. Any records of traffic and transport incidents related to operational activities would be captured in the incident management system including details of any corrective actions undertaken.
		Keep records of any driving incidents during operations as required	Compliant	Records of all driving incidents during operations were captured in the incident management system including details of any corrective actions undertaken. No incidents were recorded.
		Keep records in a fauna register of any sightings, near misses or fauna strikes as required during operations	Compliant	An animal control register was used to record any instances of sightings, near misses or strikes as required during operations. No incidents were recorded.
11	Minimise impacts upon environmental values of the local community, minimise impacts on cultural heritage, minimise safety risks to the public and other third parties, maintain and enhance partnership with the local community, including local contractors, and no loss to the aesthetic or enjoyment for the community, during the regulated activity (community)	An absence of issues raised by the community will be used as an indicator for successful communication No unresolved complaints The community will be highly consulted, and all comments will be assessed and where viable, recommendations implemented There will be a high level of satisfaction by the community No vehicle accidents No offsite release of contamination from road corridors Keeping a register of all incidents related to access issues, unauthorised access and requirements of pastoralists, recognising that these requirements may change seasonally	Compliant Not Applicable Compliant Compliant Compliant Not Applicable Compliant Compliant Compliant Compliant	Incident management system records did not identify any instances of complaints from the community. Incident management system records did not identify any instances of complaints, therefore the EPS was not triggered. PV stakeholder communications log records indicated CP's continued engagement with identified stakeholders. Meeting records did not identify any comments related to operations which needed to be assessed or corrective actions implemented. Records of local community meetings indicate a generally positive response to CP activities and engagement with the community. Incident management system records did not identify any vehicle accidents. Incident management system records did not identify any instances of offsite release of contaminants impacting road corridors. Incident management system was used to capture and record any instances of unauthorised or other issues related to site access. No issues were identified during the period.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Keeping records of land access agreements closed out at completion	Not Applicable	PVGF is currently an operational site and no land access agreements have been closed out during the reporting period, therefore the EPS was not triggered.
		Maintaining a complaints register	Compliant	No records of any complaints as a result of operational activities were identified. However, a record of all complaints related to the operation would be registered and captured in the incident management system.
		Keeping records of stakeholder engagement	Compliant	PV stakeholder communications log was used to recorded CP's continued engagement with identified stakeholders during operations.
		Record complaints from surrounding land users regarding noise and vibrations from operations	Not Applicable	The incident management system did not identify any records of complaints from surrounding land users' regarding noise and vibration, therefore the EPS was not triggered.
12	Avoid disturbance of or damage to Aboriginal or cultural heritage artefacts or Sacred Sites, minimise impacts on or disruption to activities of Indigenous stakeholders in culturally significant areas, ensure adequate background information and training is provided to employees and contractors working in culturally significant areas, and ensure the health and safety of	No incidences of disturbance of archaeological sites or sites of cultural significance	Compliant	Incident management records did not identify any disturbance of archaeological sites or sites of cultural significance.
		Keeping a register of all occurrences of archaeological sites identified for provision to the NLC, AAPA and Heritage Branch within DLPE, now the DTSC	Not Applicable	All existing archaeological sites at PV are mapped and restricted access areas established and communicated so as to avoid any potential impacts. However, during the reporting period incident management system records did not identify any additional archaeological sites, therefore the EPS was not triggered.
		Keep records of any incidents relating to interference with Aboriginal sacred sites, places or objects of archaeological significance	Not Applicable	No incidents involving interference with aboriginal sacred sites, places or objects of archaeological significance were captured in the incident management system during the reporting period, therefore the EPS was not triggered.
		Reporting all new discoveries or cultural artefacts.	Not Applicable	The were no new discoveries or cultural artefacts identified during the reporting period.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	working and the community is not compromised through management of cultural and environmental awareness, during the regulated activity (cultural heritage and Sacred Sites)			
13	A safe, stable landform consistent with the surrounding land use and disturbed areas are rehabilitated and returned to the original land use and are consistent with the adjacent analogue site (decommissioning and rehabilitation management)	<p>Successful rehabilitation will mean rehabilitation to a similar condition of the surrounding environment</p> <p>No further habitat loss resulting from Central Petroleum's activities</p> <p>Redundant assets will be continually assessed and in necessary decommissioned</p> <p>Keeping records of rehabilitation monitoring</p> <p>Keeping and inventory of decommissioned infrastructure</p> <p>Reporting all incidents in CPs incident reporting system and initiating corrective actions</p> <p>Yearly visual inspections of rehabilitated areas</p>	<p>Not Applicable</p> <p>Compliant</p> <p>Compliant</p> <p>Not Applicable</p> <p>Compliant</p> <p>Compliant</p> <p>Not Applicable</p>	<p>Records indicate that no areas were under rehabilitation which required restoration to a similar condition of the surrounding environment, therefore the EPS was not triggered.</p> <p>Incident management system records did not identify any instances of further habitat loss as a result of operations. In addition, no clearing or civil works were undertaken during the reporting period.</p> <p>Assets are continuously being assessed against their use life / safe operating window. However, during the period no material assets were decommissioned.</p> <p>Records indicate that no areas were under rehabilitation which required monitoring during the reporting period, therefore the EPS was not triggered.</p> <p>PVGF asset register was used to record the timing and details of any decommissioned infrastructure.</p> <p>All incidents were captured and recorded in the Incident management system, however records did not identify any related to decommissioning and rehabilitation management.</p> <p>Records indicate that no areas were under rehabilitation which required visual inspections during the reporting period, therefore the EPS was not triggered.</p>

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		<p>Conducting photographic point monitoring before during and after rehabilitation as required during rehabilitation works</p> <p>Establishing photographic monitoring points before disturbance and vegetation survey before disturbance so to benchmark against in later surveys</p> <p>Implementing the following monitoring program:</p> <ul style="list-style-type: none"> - Immediately after rehabilitation works completed to check for integrity of works and ability for future rehabilitation success - Following first wet season - check stability of soil, landform, vegetation type and re-growth and appearance of weeds - One year after rehabilitation – check revegetation success - Yearly inspection – check weed, erosion and sediment control management - Three years after – check soil stability, landscape and vegetation re-growth and type after several wet seasons - After five years – check long term rehabilitation success measured by landform stability and vegetation regrowth 	<p>Not Applicable</p> <p>Not Applicable</p> <p>Not Applicable</p>	<p>Records indicate that no areas were under rehabilitation during the reporting period, therefore the EPS was not triggered.</p> <p>Records indicate that no areas were under rehabilitation which required photographic monitoring or vegetation surveys prior to disturbance during the reporting period, therefore the EPS was not triggered.</p> <p>Records indicate that no areas were under rehabilitation which required photographic monitoring during the reporting period, therefore the EPS was not triggered.</p>

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		<p>Providing an annual rehabilitation report with the Annual Environment Report which with information including:</p> <ul style="list-style-type: none"> - Total area rehabilitated - Photographic monitoring points with GPS locations and results - Any areas left in agreement with future landholders / managers - Monitoring of progressive rehabilitation - Any erosion and sedimentation issues - Any stakeholder consultations and results of discussions - Any issues noted and remedial actions taken (RRCA) - Monitoring of contaminated sites (RCCA) - Weed Monitoring 	Not Applicable	No areas were under rehabilitated during the reporting period, therefore no reporting required as the EPS was not triggered.
14	EMP s 9.4.2 Auditing	Conduct an annual assurance audit by a CP HSE representative or environmental consultant to assess compliance against the FEMP commitments and risk management controls	Compliant	An audit was undertaken in March 2019 assessing compliance with environmental performance standards in the EMP. Any issues identified have been assessed and corrective action implemented.
15	EMP s 9.4.1, Table 9-1, All	Keep records of inductions and training to ensure 100% participation by all relevant personnel, contractors and visitors	Compliant	PV site induction records maintained in the training register identified that all employees and contractors were inducted prior to or upon arrival at site and before any work commenced. Incident management system records during operations did not identify any employees and contractors who were not inducted. Induction materials include all key environmental performance outcomes.

2.3 Mandatory Reporting Requirements

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

Table 2-3 Compliance with Mandatory Reporting Requirements

No	Reference	Requirement	Compliance Status	Evidence
1	Reg 14	A current EMP remains in force until the interest holder notifies the Minister the activity is no longer being carried out and all of the environmental outcomes and obligations under the plan have been met, and the Minister advises the interest holder the notice is accepted and the plan ceases to be in force.	Not Applicable	PVGF is currently an operational site and the EMP is still in force.
2	EMP s 12 Stakeholder Consultation Schedule 1, Item 9(2)	Interest holders are required to conduct future engagement with stakeholders, in accordance with the description in the EMP.	Compliant	CP conducted regular engagement with stakeholders during the reporting period with the details and outcomes recorded in the PV stakeholder communications log.
3	EMP s 11 Reporting Reg 33	DENR is notified of reportable incidents within 2 hours of the interest holder becoming aware of the incident, or within 2 hours of the incident occurring. A written report must be provided within 24 hours if the initial report was made orally.	Not Applicable	CP did not have any reportable incidents as a result of the activities outlined in the EMP.
4	EMP s 10 Reporting Reg 34	Reports on reportable incidents are to be provided to DENR as soon as practicable and within 72 hours of the event occurring. A final report must be provided to DENR within 30 days after remediation/clean-up of the affected area.	Not Applicable	CP did not have any reportable incidents as a result of the activities outlined in the EMP.

No	Reference	Requirement	Compliance Status	Evidence
5	EMP s 10 Reporting Reg 35	A written report of all recordable incidents must be provided to DENR not later than 15 days after the 90-day reporting period (unless otherwise agreed).	Compliant	All recordable incidents reports were submitted as required in May, August, November 2019 and February 2020.
6	Reg 37A	A report about flowback fluid from hydraulic fracturing must be provided to the Minister within 6 months of the flowback occurring.	Not Applicable	The regulated activity did not include hydraulic fracturing.
7	Reg 37B	A report about produced water from hydraulic fracturing must be provided to the Minister within 6 months of the produced water being extracted.	Not Applicable	The regulated activity did not include hydraulic fracturing.
8	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 activity.	Not Applicable	No construction, drilling or seismic survey activities were conducted, therefore no notification necessary.
9	EMP s 9,8.2.4 Table 8-4 Waste Management	Regulatory reporting under the National Pollution Inventory (NPI) as per the National Environment Protection (National Pollution Inventory) Measure 1998	Compliant	NPI reporting was undertaken and submitted as per the National Environment Protection requirement in September 2019.
10	EMP s 8.2.7, Table 8-7 Biosecurity Management	Recording weed distribution within CP's GIS and if required, providing the data to the Weeds Officer at DENR and DPIR	Partially Compliant	Weed distribution is captured and maintained in the PV weed management plans and in CPs GIS. An annual weeds survey was conducted in May 2019 however the reports were not provided to DENR during the period. The reports have subsequently been provided to the NT Weeds Officer at DENR.
		Notify a Weeds Officer of the presence of a declared weed within 14 after becoming aware of a declared weed that has not previously been, or known to have been, present on the land, as per the Weeds Management Act 2001	Not Applicable	No notification necessary as CPs inspection, audit and incident management system records did not identify any instances where declared weeds that had not previously been or known to have been, present on the land.

No	Reference	Requirement	Compliance Status	Evidence
11	EMP s 8.2.10, Table 8-10 Air Quality Protection Measures	Completing annual reporting as per the National Greenhouse and Energy Reporting Act 2007 and the National Environment Protection (National Pollution Inventory) Measure	Compliant	Annual reporting of greenhouse gas emissions at PV was undertaken as per the National Greenhouse and Energy Reporting Act and was submitted in September 2019.
12	Environment Protection and Biodiversity Conservation Act 1999 s 199, s 214, s 256	If a person who undertakes an activity that results in the unintentional death, injury, trading, taking, keeping or moving of a member of a listed threatened species (except a conservation dependent species), a member of a listed threatened ecological community, all cetacean (whale, dolphin or porpoise) species, a member of a listed migratory species, or a member of a listed marine species in or on a Commonwealth area and the activity was not authorised by a permit, then Secretary of the Department must be notified within 7 days of the person becoming aware of the results of the activity.	Not Applicable	No notification necessary as CP did not have any instances of the activity described.
13	National Greenhouse and Energy Reporting Act 2007 s 19	A registered corporation must provide a report to the Greenhouse and Energy Data Officer relating to the greenhouse gas emissions, energy production and energy consumption from the operation of facilities under the operational control of the corporation and entities that are members of the corporation's group, during that financial year	Compliant	Reporting greenhouse gas emissions at PV including during the project was undertaken as per the National Greenhouse and Energy Reporting Act and was submitted in September 2019.
14	Bushfires Management Act 2016 s 90	If the owner or occupier of the land is unable to control a fire on the land, the owner or occupier must take all reasonable steps to notify a fire control	Not Applicable	No notification necessary as CP did not have any uncontrolled fires on site.

No	Reference	Requirement	Compliance Status	Evidence
		officer or fire warden, and the occupier of any land to which the fire is likely to spread or a person apparently over the age of 16 years present on that land		
15	Environment Protection Act 2019 div 8	Duty to notify the NT EPA as soon as practicable but within 24 hours of any incident which occurs which causes or threatens to cause material or significant environmental harm	Not Applicable	No notification necessary as CP did not have any incidents which caused or threatened to cause material or significant environmental harm as a result of the activities outlined in the EMP.
16	Territory Parks and Wildlife Conservation Act 1976 s 49	The Director may, by notice in writing require the owner or occupier of land in a feral animal control area to undertake the measures specified in the notice for the control or eradication of feral animals on the land	Not Applicable	No notice provided by the Minister.
17	Waste Management and Pollution Control Act 1998 s 14	Duty to notify the NT EPA as soon as practicable but within 24 hours of any incident which occurs which causes or threatens to cause pollution resulting in material or significant environmental harm	Not Applicable	No notification necessary as CP did not have any incidents which caused or threatened to cause pollution resulting in material or significant environmental harm as a result of the activities outlined in the EMP.
18	Weeds Management Act 2001 s 29	When given notice by the Minister, land occupiers and landowners have a duty to notify the Minister of the presence of a plant, declared weed or potential weed on the land within the time specified in the notice	Not Applicable	No notice provided by the Minister.

3.0 Summary of Compliance

3.1 Overview of Compliance

Table 3-1 provides a summary of the results of the compliance assessment against the 142 total compliance items.

Table 3-1 Compliance Summary

Compliance Indicator	Number	Percentage
Compliant	88	62%
Partially Compliant	6	4%
Non-Compliant	0	0%
Not Applicable	48	34%

3.2 Overview of Items Found Not Compliant or Partially Compliant

The following sections describe:

- The specific compliance requirements not met for the reporting period
- An analysis of the possible potential environmental harm or impact to environmental values resulting from non-compliance or partially compliance, using multiple lines of evidence
- A summary of the corrective actions already implemented, and further actions still required, as applicable, to ensure compliance is fully achieved in the future.

3.2.1 Environmental Performance Standards

Table 3-12 provides a consolidated summary of the performance standards which were partially compliant during the reporting period.

Table 3-2 Partially compliant Environmental performance standards

Description	Potential environmental harm or impact	Corrective actions
<p>Two incidents of uncontrolled releases of gas due to asset integrity issues at:</p> <ol style="list-style-type: none"> 1. PV13 as a result of a failed level controller (LC) in the gas/water separator; and 2. PV2 as a result of a vessel level control dump valve not closing and intermittently venting small volumes of gas through the water line. 	<p>No environmental harm as:</p> <ul style="list-style-type: none"> - gas is lighter than air and dissipates quickly into the atmosphere. - an inspection of the area and post incident did not identify any further impacts as a result of the integrity issues. 	<ol style="list-style-type: none"> 1. PV13 Immediate: Shut in well, established exclusion zones around the tanks, replaced the old LC with an updated alternative. Follow-Up: Replaced existing LC at PV 2,6,7,13 in both the upper and lower coalescer chambers. 2. PV2 Immediate: Shut in well, manually isolated water line, undertake investigation which found a build-up of salt on the pneumatic relay as a result of a faulty seal on the dump valve allowing the ingress of salty water. Follow-Up: The seized pneumatic relay in the dump valve controller was replaced, the dump valve was removed and rebuilt to repair the faulty seal. The tubing between the controller and the dump valve was replaced to reduce the chance of any salt contamination.

Description	Potential environmental harm or impact	Corrective actions
Visual weekly inspections of waste receptacle to ensure no fauna access to waste storage locations, lids are secure, waste are appropriately stored and there are no leaks were required to be undertaken weekly however they were only undertaken on a monthly basis.	No environmental harm as: - no incidents of fauna access to waste receptacles.	Schedule weekly visual inspection of waste receptacles in the maintenance management system and review inspections records to identify any impacts or actions needed.
Visual inspections were required to be undertaken twice per year. to ensure no disturbance to known slater skink habitat north of PV2. An inspection was conducted by an ecologist and there was no evidence of disturbance / impacts to known slater skink habitat north of PV-02. However, the planned activity only occurred once during the reporting period.	No environmental harm as: - an additional inspection by ecologists in March 2020 found there were still 2 active burrows in the area. - no incidents of disturbance noted during inspections conducted at PV2.	Schedule bi-annual visual inspections in the maintenance management system and review inspections records to identify any impacts or actions needed.

3.2.2 Regulatory Reporting

Table 3-13 provides a summary of the reporting requirements which were partially compliant during the reporting period.

Table 3-3 Partially compliant reporting requirements

Description	Potential environmental harm or impact	Corrective actions
Weed distribution is captured and maintained in the PV weed management plans and in CPs GIS. An annual weeds survey was conducted however the reports were not provided to DENR during the period.	No environmental harm as: - surveys were undertaken which indicated no new introduced weeds and adequate management of existing weeds.	The reports have subsequently been provided to the NT Weeds Officer at DENR. Weeds surveys and the reporting of results will be scheduled in the work management system and tracked for compliance.

3.3 Application of Lessons Learned Across Central Petroleum Onshore Interests

Investigation into the root causes behind the items found to be not compliant for some or all of the reporting period related to:

- Knowledge and understanding on the specific requirements to document waste management activities.

The key lessons learned and how these have been applied are as follows:

- Continued proactive communication with regulators especially in relation to ongoing commitments; and
- Ensure all obligations are clear and scheduled in our work management systems