

Annual Environmental Performance Report 2020

EP187 2D Seismic Work Program

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1	21/12/20	Charles Dack	None
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Acronyms/Abbreviations

Acronyms/Abbreviations	Description
AEPR	Annual Environment Performance Report
EMP	2D Seismic Work Program EP187 Environment Management Plan
EP187	Exploration Permit 187
Imperial	Imperial Oil and Gas Pty Ltd
NT	Northern Territory
PER	Petroleum (Environment) Regulations 2016
The Code	Code of Practice: Onshore Petroleum Activities in the Northern Territory
DEPWS	Department of Environment Protection and Water Security, previously the Department of Environment and Natural Resources
DITT	Department of Industry Tourism and Trade, previously the Department of Primary Industry and Resources

Introduction

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

This Annual Environmental Performance Report (AEPR) applies to the EP187 2D Seismic Work Program that was approved on the 26 September 2019. The period covered by this AEPR is from the 26 September 2019 to 25 September 2020

Application was made under Regulation 22 on the 36 alternative methodologies for monitoring the progress of rehabilitation have been submitted to DENR on the 8 November 2019 and accepted by DEPWS on the same date.

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

IMPERIAL TIMELINE OF OPERATIONS

Table 1 - Imperial Timeline of Operations

EP187 2D Seismic																					
Year	2019				2020								2021								
Month	Sep	October	November	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May
Pre-Operations Archaeological Survey																					
Pre-Operations Environmental Assessments																					
EP187 2D Seismic Line Preparation		█																			
EP187 2D Seismic Line Acquisition			█																		
EP187 2D Seismic Line Rehabilitation				█																	
Rehabilitation Progress Assessment									█												
Proposed Rehabilitation Audit																					█

Timeline of events:

- Surveying of the lines commenced on 2nd October 2019.
- Recording crew mobilised on 20 October 2019.
 - Two INOVA AHV-IV 380 “RENEGADE” vibrators were employed as the seismic energy source.
 - A Sercel 428 recording system was employed to record the data.
 - Rehabilitation of the seismic lines took place immediately after acquisition.
- Crews were demobilised by 12 November 2019.
- Rehabilitation Progress Assessments
 - As per EMP Section, 4.3.9.1. Rehabilitation Activities: “The monitoring stations will be photographed pre line preparation, post seismic acquisition and post wet season with a follow up in 12 months to show the changes resulting from the planned works.”
 - As per section 4.3.8. Proposed Timetable of the EMP, “Quarterly photo-point monitoring to monitor regeneration success, areas which may require additional works and weed assessments” the February rehabilitation progress assessment (in red in the gantt chart) was postponed.
 - A post wet season weed, and vegetation assessment took place in November and June, with another planned for December 2020.
 - The November post operation rehabilitation progress assessment and June post wet season survey were undertaken with representatives from Imperial, InGauge and the DEPWS.
- It is planned that a final rehabilitation survey in the form of a Rehabilitation Audit will take place in mid-2021 by an independent.
- No lost time or restricted work injuries were recorded during the program.



1.1 Background

Imperial Oil and Gas Pty Ltd (Imperial) submitted the Environmental Management Plan titled *2D Seismic Work Program EP187* (The EMP), July 2019 under the Petroleum (Environment) Regulations (PER) that came into force 6 July 2016. The EMP was submitted to cover the preparation, acquisition and remediation of up to 231.0 kilometres of 2D seismic on the Exploration Permit 187 (EP187). The location of the regulated activities is shown in Figure 1.

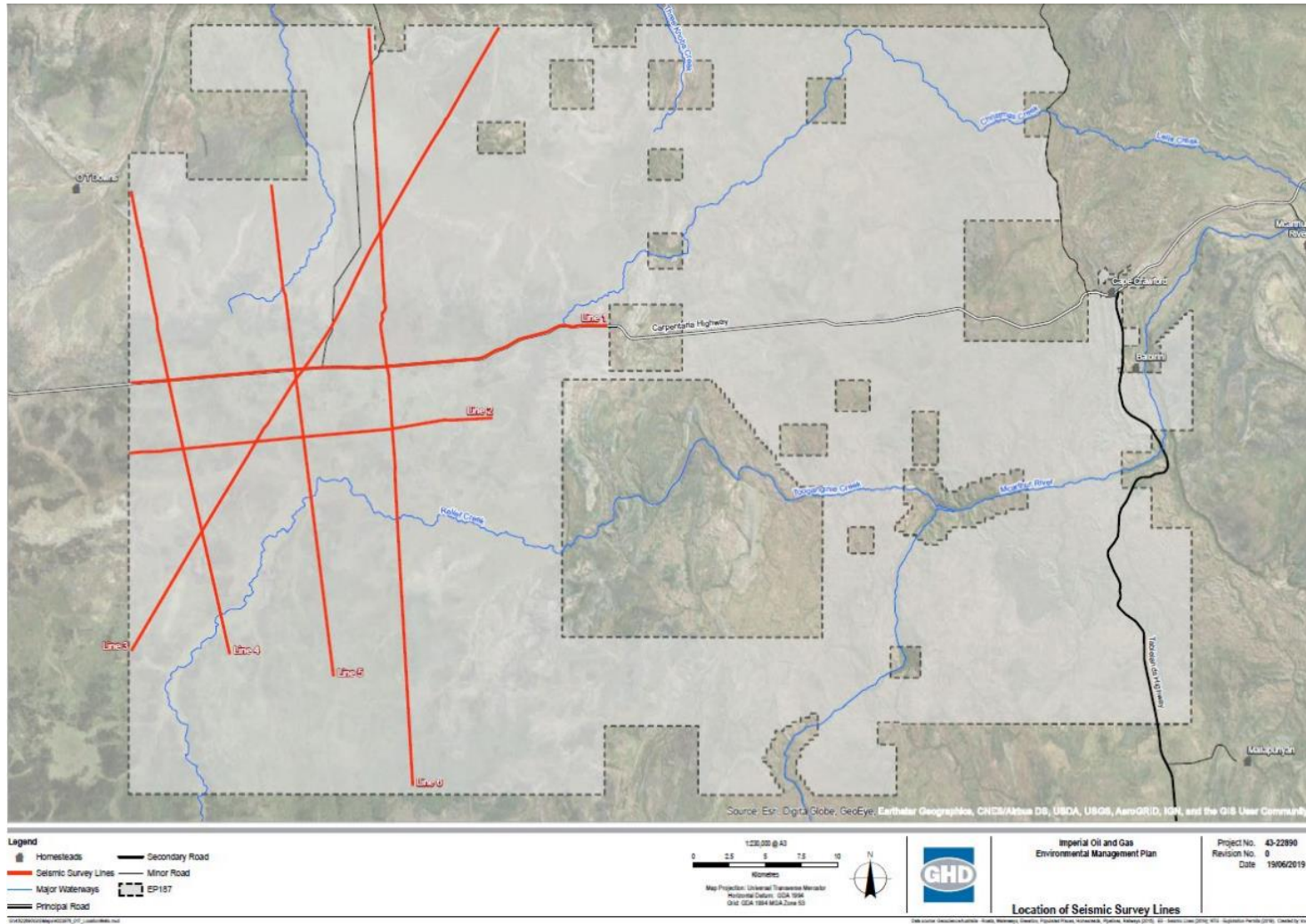


Figure 1 - Location of Regulated Activities

1.2 Contents of Performance Report

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

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

1.3 Assessment of Compliance

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

Table 2 - Compliance Descriptors

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

1.3 Evidence of Compliance

The following sources of evidence are used to demonstrate compliance:

1. Internal tracking of compliance by Imperial through:
 - Internal reviews of compliance, as follows:
 - a. Review of the landholder consultation records.
 - b. Daily and weekly inspections and monitoring measures during operations, as committed to in the EMP.
 - c. Quarterly rehabilitation progress assessments.
2. Outcomes from regulatory inspections conducted by DEPWS.
3. Recordable and reportable and recordable incident reports submitted to DEPWS.
4. Reports provided to DEPWS, DITT and other government agencies.

2. Demonstration of Compliance

Table 3 demonstrates Imperials compliance with the 4 following conditions EMP approval conditions.

2.1 Compliance with Ministerial EMP Approval Conditions

Table 3 - Compliance with Ministerial EMP Approval Conditions

Row	Condition	Compliance Status	Evidence
1	<i>Condition 1:</i> The Interest Holder must provide a report to the DEPWS where there is a non-compliance of an approval condition within 48 hours of becoming aware of the non-compliance.	Compliant	To date, there have been no reportable non-compliances.
2	<i>Condition 2:</i> The interest holder must submit to DEPWS a timetable for the regulated activity prior to commencement of the activity and update the timetable each month.	Partially Compliant	The total operational time for this project was from 2/10/19 to the 12/11/19. Given the short timeline of events Imperial undertook weekly meetings and submitted weekly reports to DEPWS outlining the progress of operations and outlining the forward operations of how the project was likely to operate. Weekly reports submitted including activities forecast and timetable for the coming week. Weekly reports were followed up with meetings every Thursday. Weekly reports were sent to DITT and DEPWS on the following dates. 14/10/2019 21/10/2019 28/10/2019 04/11/2019 11/11/2019 18/11/2019 25/11/2019

Row	Condition			Compliance Status	Evidence	
					Specific monthly letters were not sent, but a higher level of reporting was undertaken to ensure that DEPWS were fully aware of the progress of operations.	
3	<i>Condition 3:</i> The Interest Holder must provide to DEPWS within 3 months of completion of the regulated activity:	I.	High resolution aerial imagery of the disturbance area	Submission of Spatial files for DGPS points for sections of lines cleared and drone imagery representative of different vegetation types that had line clearing for seismic activities before 30 June 2020	Partially Compliant	Initial Condition requirements were submitted post initial timeline of condition 3. A requested time for future submission was met on the 30 June with the submission of. <ul style="list-style-type: none"> • Spatial files of DGPS points for sections of lines cleared. • Video footage taken from a helicopter covering areas representative of the different vegetation types that had undergone line clearing for the purposes of 2D seismic acquisition. • Imperial supplied imagery of the different vegetation types that had undergone line clearing for seismic activities, showing their revegetation status to supplement the malfunctioned drone camera imagery.
4		II.	Digital aerial photography of UAV imagery, ortho-rectified using ground control points measured using a differential GPS (DGPS) and spatial accuracy of approximately 1-2 meters			
5		III.	A spatial assessment report on the disturbance footprint for the approved regulated activity			

Row	Condition	Compliance Status	Evidence
6	<i>Condition 4:</i> The Interested Holder must provide to DEPWS, an updated rehabilitation plan within 3 months of completion of the regulated activity that includes:	I. A commitment to the continuation of rehabilitation and monitoring for three years after completion activities or until demonstration by an independent suitably qualified person, that rehabilitation objectives have been met.	Rehabilitation was undertaken immediately post the recording operations. The ongoing monitoring commitment for rehabilitation and monitoring until demonstration of rehabilitation by an independent suitably qualified person has been agreed to by Imperial and is incorporated in the EMP in section 4.3.8 proposed timetable.
7		II. A rehabilitation monitoring report detailing alternative methodologies for monitoring the progress of rehabilitation, including the use of remote sensing monitoring using high resolution satellite imagery.	Application was made detailing alternative methodologies for monitoring the progress of rehabilitation have been submitted to DEPWS on the 8 November 2020. This compliance status has been marked as a partially compliant as a report of these alternative methodologies for monitoring was not submitted to DEPWS.



2.2 Compliance with Environmental Outcomes and Environmental Performance Standards

Table 3 provides a systematic overview of Imperials compliance with the environmental outcomes and environmental performance standards within the approved EMP. (taken from Table 16 as per NT EPA recommendations and cross checked against appendix 1 performance objectives)

Table 4 - Compliance with Environmental Outcomes and Environmental Performance Standards

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
1	Air Quality (Rural air environment with qualities conducive to suitability for the life, health and wellbeing of humans and ecosystems) No deterioration to air quality due to Imperial's seismic activities	No complaints regarding air quality	Compliant	<ul style="list-style-type: none"> No complaints relating to dust nuisance. No complaints relating to impact on community and/ or public amenity. No increase in emissions resulting in permanent impact to the air shed
2		Comply with all legislation and standards and ensure that all practicable measures are taken to minimise the discharge of odours and any adverse effect	Compliant	<ul style="list-style-type: none"> All prestart vehicle checks undertaken to ensure vehicles were operating as per manufacturers and government standards for emissions. Vehicles and equipment will be switched off when not in use
3		Meet all government air quality standards for emissions	Compliant	<ul style="list-style-type: none"> All prestart vehicle checks undertaken to ensure vehicles were operating as per manufacturers and government standards for emissions. Vehicles and equipment will be switched off when not in use

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
4		Odours from the proposed exploration do not adversely affect the welfare, health and amenity of neighbours and the broader community	Compliant	<ul style="list-style-type: none"> No complaints regarding air quality have been received by Imperial. Onsite meetings with Traditional owners provided positive feedback to Imperial staff. No complaints relating to dust nuisance. No complaints relating to impact on community and/ or public amenity
5	Biodiversity -Aquatic, Marine and Terrestrial Ecology (Maintain habitat) <ul style="list-style-type: none"> Maintain the abundance, species diversity, geographic distribution, and productivity of vegetation communities Maintain the integrity, functions and environmental values of waterways and groundwater 	<ul style="list-style-type: none"> Minimise the risk of disease amplification or distribution within the natural environment 	Compliant	<ul style="list-style-type: none"> No native fauna impacts, injury or fatality recorded. No permanent detrimental impact to biodiversity or ecological function found during inspections. Inspection held November 2019 and July 2020; December 2020 is programmed to occur. Approved WMP processes and procedures followed during operations
6	<ul style="list-style-type: none"> Maintain the ecological function, abundance, species diversity and geographical distribution of flora and fauna (subterranean, terrestrial and freshwater) 	<ul style="list-style-type: none"> Management of existing weed base load and control potential introduction and spread of new weeds 	Compliant	<ul style="list-style-type: none"> No increased spread or introduction of new weeds as a consequence of exploration activities found during Inspection held November 2019 and July 2020, December 2020 is programmed to occur. Approved WMP processes and procedures followed during operations

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
7	<ul style="list-style-type: none"> Maintain, and where possible enhance, the local, regional and national conservation values of the area 	<ul style="list-style-type: none"> Monitoring work area to minimise impacts to fauna habitat and sensitive vegetation 	Compliant	<ul style="list-style-type: none"> No native fauna impacts, injury or fatality recorded. Monitoring undertaken to date is has shown no long-term loss of habitat due to seismic activities. Inspection held November 2019 and July 2020; December 2020 is programmed to occur. Ongoing consultation with Local Pastoralists provided positive feedback to Imperial staff around impact to land conditions
8		<ul style="list-style-type: none"> No native fauna impacts (injury or fatality) 	Compliant	<ul style="list-style-type: none"> No native fauna impacts, injury or fatality recorded.
9		<ul style="list-style-type: none"> No loss of sensitive and/or riparian vegetation 	Compliant	<ul style="list-style-type: none"> Monitoring undertaken to date is has shown no long-term loss of sensitive or riparian vegetation due to seismic activities. Inspection held November 2019 and July 2020; December 2020 is programmed to occur.
10		No long-term loss of habitat due to seismic activities	Compliant	<ul style="list-style-type: none"> Monitoring undertaken to date is has shown no long-term loss of habitat due to seismic activities. Inspection held November 2019 and July 2020; December 2020 is programmed to occur.

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
11	Cultural (Maintain cultural heritage of the region, both indigenous and nonindigenous) <ul style="list-style-type: none"> • Protect cultural values of the area. • Minimise impacts on cultural heritage • Minimise impacts upon or disruption to activities of indigenous stakeholders in culturally significant areas Avoid disturbance of or	<ul style="list-style-type: none"> • Cultural and heritage integrity and diversity of the area is maintained 	Compliant	<ul style="list-style-type: none"> • No complaints resulting from temporary or permanent impacts to sites or items of heritage significance received by Imperial. • No damage to sites of Cultural Sensitivity or Sacred Sites has been undertaken by Imperial. • Imperials compliance with Native Title Agreement provisions have ensured that no incidences of disturbance of archaeological sites or sites of cultural significance have occurred. • Ongoing consultation through on ground employment of traditional owners for the duration of the operation to ensure no impacts occurred to culturally significant sites.

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
12	damage to Aboriginal or cultural heritage artefacts or Sacred Sites	<ul style="list-style-type: none"> No incidences of disturbance of archaeological sites or sites of cultural significance 	Compliant	<ul style="list-style-type: none"> No complaints resulting from temporary or permanent impacts to sites or items of heritage significance received by Imperial. No damage to sites of Cultural Sensitivity or Sacred Sites has been undertaken by Imperial. Imperial's compliance with Native Title Agreement provisions have ensured that no incidences of disturbance of archaeological sites or sites of cultural significance have occurred. Pre site clearance walks with Traditional Owners for sites of environmentally sensitive, riparian vegetation or culturally important habitats or sites. Undertaken between the 5-9/8/2020. Ongoing consultation through on ground employment of traditional owners for the duration of the operation to ensure no impacts occurred to culturally significant sites.

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
13		<ul style="list-style-type: none"> Ensure minimum footprint impact changes to the biological and physical environment occur and that these changes do not adversely affect cultural associations with the area 	Compliant	<ul style="list-style-type: none"> clearing and monitoring route selected in conjunction with the Imperials compliance with Native Title Agreement provisions, the Ethnographic anthropologist survey. Inspection of the active work areas and the integrity and clear marking of the 'No Go Zones' and extent of active works to ensure that works do not adversely affect cultural associations with the area. AAPA and onsite cultural clearances used as guide for determining no go zones. Ongoing consultation through on ground employment of traditional owners for the duration of the operation to ensure no impacts occurred to culturally significant sites.
14		No unauthorised disturbance to identified cultural and heritage sites and/or objects of significance		Compliant
15	Land (Suitability and stability of land for existing uses) <ul style="list-style-type: none"> Maintain existing quality of 	<ul style="list-style-type: none"> Any ground disturbance activity will be undertaken in accordance with the ESP and LCP. 	Compliant	<ul style="list-style-type: none"> daily checks during operation of open lines and weekly checks during operation of rehabilitated lines found no evidence of non-compliance with the ESP and LCP.

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
16	soil profile <ul style="list-style-type: none"> Minimise land disturbance Protect the productivity of the land for its intended land use	<ul style="list-style-type: none"> Ensure that vegetation clearing for seismic line preparation does not result in land degradation 	Compliant	<ul style="list-style-type: none"> Inspection held November 2019 and July 2020, found, <ul style="list-style-type: none"> No net loss of fertile topsoil material, No permanent instability affecting soil or landforms, No permanent detrimental impacts to water resources (surface or groundwater) or waterways / wetlands, No permanent detrimental impact to biodiversity or ecological function. Site operations were rehabilitated immediately after recording and all areas were left in a safe, non-polluted state.
17		<ul style="list-style-type: none"> Ensure that rehabilitation is compatible with existing land use and meets the expected standards of the community 	Compliant	<ul style="list-style-type: none"> Quarterly checks during operation of rehabilitated areas for Pits and scrapes, if any, to be backfilled and compacted to prevent future formation of depressions undertaken. weekly checks of the stabilised batters of pits and voids, if any, and exposed slopes with a maximum slope gradient of 1V:2H was enforced to ensure that rehabilitation is compatible with existing land use. Monthly checks to inspect and monitor condition / effectiveness of stabilization of disturbed areas of the site was undertaken during operations. No complaints received around the level of rehabilitation.

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
18		Areas left safe, stable and non-polluting	Compliant	<ul style="list-style-type: none"> • quarterly checks during operation of rehabilitated areas for Pits and scrapes, if any, to be backfilled and compacted to prevent future formation of depressions undertaken. • weekly checks of the stabilised batters of pits and voids, if any, and exposed slopes with a maximum slope gradient of 1V:2H was enforced to ensure that rehabilitation is compatible with existing land use. • Monthly checks to inspect and monitor condition / effectiveness of stabilization of disturbed areas of the site was undertaken during operations. • Inspection held November 2019 and July 2020, found, <ul style="list-style-type: none"> ○ No net loss of fertile topsoil material, ○ No permanent instability affecting soil or landforms, ○ No permanent detrimental impacts to water resources (surface or groundwater) or waterways / wetlands, ○ No permanent detrimental impact to biodiversity or ecological function.
19	Surface and Groundwater (Stability of land to preserve existing water quality, landscapes and ecosystems) <ul style="list-style-type: none"> • Protection of waterways Protect the quantity and	<ul style="list-style-type: none"> • Maintain, and where possible enhance, the beneficial use of surface water and groundwater and maintain quality to ensure ecosystem maintenance 	Compliant	<ul style="list-style-type: none"> • The installation of sediment control devices down gradient of stockpiles and disturbed / active areas of the site (including roadsides and cleared areas) was undertaken to enhance, the beneficial use of surface water and groundwater and maintain quality to ensure ecosystem maintenance

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence	
20	quality of surface and groundwater	<ul style="list-style-type: none"> No degradation to surface water quality or drainage 	Compliant	<ul style="list-style-type: none"> the installation of sediment control devices down gradient of stockpiles and disturbed / active areas of the site (including roadsides and cleared areas) was undertaken to enhance. Install runoff diversion devices up gradient of disturbed and active work areas of the site to divert 'clean' storm water runoff away from disturbed / potentially contaminated areas. Install runoff velocity reduction devices to dissipate / disrupt concentrated flow and runoff from sloped areas. weekly inspection checks and monitoring was undertaken during operations to consider the condition and effectiveness of erosion mitigation measures adopted across the site. Ongoing monitoring has not discovered any ongoing degradation to surface water quality, erosion of flow paths or drainage. 	
21		<ul style="list-style-type: none"> No detrimental impact to ground water dependent ecosystems 		Compliant	<ul style="list-style-type: none"> No groundwater encountered during seismic operations was recovered for use. All water for operations was be sourced commercially. Ongoing monitoring has not discovered any ongoing degradation to surface water quality, erosion of flow paths or drainage.
22		No new erosion flow paths originated from seismic activities		Compliant	<ul style="list-style-type: none"> Inspection held November 2019 and July 2020, found no new erosion flow paths originating from seismic activities.

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
23	Oil Spill (Protection of ecosystems and human health values from uncontrolled oil releases) <ul style="list-style-type: none"> Minimise impacts to ecosystems, land productivity and human health values Minimise impacts on soil, surface water and groundwater 	<ul style="list-style-type: none"> No uncontrolled releases of oils 	Compliant	<ul style="list-style-type: none"> Refuelling, fuel decanting and vehicle maintenance occurred in designated areas only that have spill protection/containment measures in place. Hazchem and fuel areas bunded to comply with relevant standards. Storage areas designed to comply with relevant standards for hazardous materials. Spill containment measures were stored and maintained on site during operations. no uncontrolled releases of oils were registered on the incident register.
24		No incorrect storage and use of oils	Compliant	<ul style="list-style-type: none"> Refuelling, fuel decanting and vehicle maintenance occurred in designated areas only that have spill protection/containment measures in place. Hazchem and fuel areas bunded to comply with relevant standards. Storage areas designed to comply with relevant standards for hazardous materials. All morning pre-start checks confirmed that storage of oils was appropriate.

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
25	Noise and Vibration (Livelihood and wellbeing of local communities and towns) <ul style="list-style-type: none"> • No impact to surrounding stakeholder from noise • No loss to the aesthetic or enjoyment factor for the community • Minimise safety risk to the public and other third parties • Maintain and enhance partnerships with the local community, including using local contractors 	<ul style="list-style-type: none"> • Maintain noise and vibration levels within statutory guidelines for rural areas 	Compliant	<ul style="list-style-type: none"> • Equipment operators will be made aware of the potential issues relevant to each work area and techniques to minimize noise and vibration emissions. • Vehicles and equipment were switched off when not in use. • Vehicles and equipment used and maintained in accordance with manufacturer's specifications to ensure that noise and vibration levels were within statutory limits of output.
26		<ul style="list-style-type: none"> • Ensure that an adequate level of service, safety and public amenity is maintained 	Compliant	<ul style="list-style-type: none"> • No complaints relating to noise and/or vibration nuisance received. • Traffic management crew used for works undertaken within the road reserve to ensure public and workers safety during operational period where road corridor was in use.
27		<ul style="list-style-type: none"> • Manage seismic operations only to daylight. 	Compliant	<ul style="list-style-type: none"> • Seismic operations only occurred during day light hours of operation.
28		<p>The community is highly consulted with and all comments provided are assessed and those viable implemented</p>	Compliant	<ul style="list-style-type: none"> • Stakeholder engagement undertaken as per the EMP Stakeholder management and consultation plan

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
29	Planning and Social (Livelihood and wellbeing of local communities and towns) <ul style="list-style-type: none"> Maintain the recreational values of the area Protect the economic values of the area 	<ul style="list-style-type: none"> Identify opportunities to deliver benefits to the local community throughout all phases of the Project 	Compliant	<ul style="list-style-type: none"> Imperial engaged the Heart Break Hotel and Leila Creek Station to provide accommodation and catering during the operation. Local helicopter services used for ongoing environmental monitoring. Traffic management crew sourced from local providers. Fuel and other resources for the program was sourced from local vendors. Daily discussions had with pastoralists to take their considerations on board, update them of operational progress and a sign off of operations. Community development undertaken to include the upgrade of infrastructure including gate and cattle grid installation by Imperial.

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
30		<ul style="list-style-type: none"> Identify, and to the greatest extent practicable minimise, any potential adverse effects on the community 	Compliant	<ul style="list-style-type: none"> Consultation through stakeholder engagement work undertaken to identify and minimise any potential adverse effects on the community. No complaints relating to recreational values and/or economic values of the area. No complaints relating to impact on community, recreational and/ or economic values. Daily discussions had with pastoralists to take their considerations on board, update them of operational progress and a sign off of operations. Community development undertaken to include the upgrade of infrastructure including gate and cattle grid installation by Imperial. Ongoing consultation through on ground employment of traditional owners for the duration of the operation to ensure no impacts occurred to culturally significant sites. Onsite meetings with Traditional owners provided positive feedback to Imperial staff

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
31		<ul style="list-style-type: none"> No off-site release of contamination from seismic activities 	Compliant	<ul style="list-style-type: none"> Refuelling, fuel decanting and vehicle maintenance occurred in designated areas only that have spill protection/containment measures in place. Hazchem and fuel areas bunded to comply with relevant standards. Storage areas designed to comply with relevant standards for hazardous materials. spill containment measures were stored and maintained on site during operations. no uncontrolled releases were registered on the incident register.
32		<ul style="list-style-type: none"> An absence of issues raised by the community as indicator for successful communication 	Compliant	<ul style="list-style-type: none"> No complaints relating to recreational values and/or economic values of the area. No complaints relating to impact on community, recreational and/ or economic values. communications stakeholder engagement undertaken as per the EMP Stakeholder management and consultation
33		<ul style="list-style-type: none"> No unresolved complaints 	Compliant	<ul style="list-style-type: none"> Not applicable.
34		High level of satisfaction by the community	Compliant	<ul style="list-style-type: none"> All interactions with community members as part of stakeholder engagement and as part of the ongoing operations of the project have provided positive feedback

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
35	<p>Waterways (Stability of land to preserve existing water quality, landscapes and ecosystems)</p> <ul style="list-style-type: none"> • Protection of waterways <p>Protect the quantity and quality of surface water</p>	<ul style="list-style-type: none"> • Maintain the integrity, stability and environmental values of the creek, riverbanks, and watercourses 	Compliant	<ul style="list-style-type: none"> • The installation of sediment control devices down gradient of stockpiles and disturbed / active areas of the site (including roadsides and cleared areas) was undertaken to minimise erosion potential. • Install runoff diversion devices up gradient of disturbed and active work areas of the site to divert 'clean' storm water runoff away from disturbed / potentially contaminated areas. • Install runoff velocity reduction devices to dissipate / disrupt concentrated flow and runoff from sloped areas. • Weekly inspection checks and monitoring was undertaken during operations to consider the condition and effectiveness of erosion mitigation measures adopted across the site

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
36		<ul style="list-style-type: none"> Protect existing water processes including sediment movement 	Compliant	<ul style="list-style-type: none"> The installation of sediment control devices down gradient of stockpiles and disturbed / active areas of the site (including roadsides and cleared areas) was undertaken to minimise erosion potential. Install runoff diversion devices up gradient of disturbed and active work areas of the site to divert 'clean' storm water runoff away from disturbed / potentially contaminated areas. Install runoff velocity reduction devices to dissipate / disrupt concentrated flow and runoff from sloped areas. Weekly inspection checks and monitoring was undertaken during operations to consider the condition and effectiveness of erosion mitigation measures adopted across the site
37		No loss of sensitive vegetation (e.g riparian) resulting from seismic activities	Compliant	<ul style="list-style-type: none"> seismic acquisition activities undertaken post analysis of route options to avoid sensitive vegetation. Monitoring undertaken to date is has shown no long-term loss of sensitive or riparian vegetation due to seismic activities. Inspection held November 2019 and July 2020; December 2020 is programmed to occur.

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
38	Waste Disposal (Maintain the integrity of ecosystems and agricultural productivity) <ul style="list-style-type: none"> Minimise impacts to ecosystems, land productivity and human health values Minimise impacts on soil, surface water, groundwater, sensitive habitat and air quality 	<ul style="list-style-type: none"> No interaction of wildlife, stock or human receptors with stored waste. 	Compliant	<ul style="list-style-type: none"> No complaints relating disposal. zero incidents
39		<ul style="list-style-type: none"> No rubbish is left in the area after completion of seismic operations. 	Compliant	<ul style="list-style-type: none"> Monitoring undertaken post operation has shown no rubbish has been left in operational areas as a result of the seismic operations after completion. Inspection held November 2019 and July 2020; December 2020 is programmed to occur.
40		<ul style="list-style-type: none"> All waste is transported and disposed of offsite in accordance to The Code 	Compliant	<ul style="list-style-type: none"> All waste has transported and disposed of offsite in accordance with The Code. Records of volumes and types of waste generated on site, the treatment / disposal method adopted for each waste stream and dates of off-site waste transport and disposal

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
41		<ul style="list-style-type: none"> All rubbish generated in the field is segregated in accordance to Schedule 2 of the Waste Management and Pollution Control (Administration) Regulations 1998 for disposal at the nearest approved refuse station. 	Compliant	<ul style="list-style-type: none"> All waste has transported and disposed of offsite in accordance to The Code. Records of volumes and types of waste generated on site, the treatment / disposal method adopted for each waste stream and dates of off-site waste transport and disposal
42		No oil contamination to the environment	Compliant	<ul style="list-style-type: none"> Refuelling, fuel decanting and vehicle maintenance occurred in designated areas only that have spill protection/containment measures in place. Hazchem and fuel areas bunded to comply with relevant standards. Storage areas designed to comply with relevant standards for hazardous materials. Spill containment measures were stored and maintained on site during operations. No uncontrolled releases of oils were registered on the incident register.

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
43	Visual and Landscape (Livelihood and wellbeing of local communities and towns) <ul style="list-style-type: none"> Minimise impacts upon environmental values of the local community Maintain and enhance partnerships with the local community, including using local contractors No loss to the aesthetic or enjoyment factor for the community 	<ul style="list-style-type: none"> Design the Programme to minimise any detriment to the visual amenity of the area 	Compliant	<ul style="list-style-type: none"> The location of liners were placed preferably behind visual barrier such as tree line or hill to minimise impacts to visual amenity of the area. Light pollution appropriately managed through the following; <ul style="list-style-type: none"> ensuring all operations were only permitted during daylight hours. All staff boarded at the heart break hotel to reduce any need for a camp.
44		<ul style="list-style-type: none"> Acknowledge the introduction of a non-rural element into the landscape and seek to minimise the effect 	Compliant	<ul style="list-style-type: none"> The introduction of noise, vibration and clearing activities have all been outlined as items and have been examined for areas of potential minimisation.
45		Manage potential overspill from light sources and comply with appropriate standards	Compliant	<ul style="list-style-type: none"> No night time operations were undertaken. All operations undertaken during day light hours so no overspill from light sources would occur. Light pollution appropriately managed through the following. <ul style="list-style-type: none"> ensuring all operations were only permitted during daylight hours. All staff boarded at the heart break hotel to reduce any need for a camp.

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
46		<ul style="list-style-type: none"> High level of satisfaction by the community 	Compliant	<ul style="list-style-type: none"> all interactions with community members as part of stakeholder engagement and as part of the ongoing operations of the project have provided positive feedback. no complaints received about visual or landscape issues by the community.
47		<ul style="list-style-type: none"> An absence of issues raised by the community as indicator for successful communication 	Compliant	<ul style="list-style-type: none"> No complaints relating to the project's operations have been received by Imperial.
48		No unresolved complaints	N/A	N/A
49	Traffic (Livelihood and wellbeing of local communities and towns) <ul style="list-style-type: none"> Minimise safety risks to the public and other third parties No loss to the aesthetic or enjoyment factor for the community 	Ensure that roads are maintained, and road traffic managed to meet the required level of service	Compliant	<ul style="list-style-type: none"> Traffic management crew used for works undertaken within the road reserve to ensure public and workers safety during operational period where road corridor was in use. Traffic management plan was developed and in operation. Traffic operations included the use of road marshals and operations to only occur on a Sunday.
50	Minimise impacts upon environmental values of the local community	<ul style="list-style-type: none"> Implement appropriate measures to mitigate adverse traffic effects. 	Compliant	<ul style="list-style-type: none"> Traffic management crew used for works undertaken within the road reserve to ensure public and workers safety during operational period where road corridor was in use.
51		<ul style="list-style-type: none"> An absence of issues raised by the community as indicator for successful communication 	Compliant	<ul style="list-style-type: none"> No complaints relating to the project's operations have been received by Imperial.

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
52		• No unresolved complaints	N/A	Not applicable.
53		• The community is highly consulted with and all comments provided are assessed and those viable implemented	Compliant	<ul style="list-style-type: none"> • All interactions with community members as part of stakeholder engagement and as part of the ongoing operations of the project have provided positive feedback. • When community have reached out for incorporation with Imperial their services have been included into the project scope. for example, <ul style="list-style-type: none"> ○ Imperial engaged the Heart Break Hotel and Leila Creek Station to provide accommodation and catering during the operation. ○ Local helicopter services used for ongoing environmental monitoring. ○ Traffic management crew sourced from local providers. ○ Fuel and other resources for the program was sourced from local vendors
54		• High level of satisfaction by the community	Compliant	<ul style="list-style-type: none"> • all interactions with community members as part of stakeholder engagement and as part of the ongoing operations of the project have provided positive feedback. • Community and stakeholder engagement has found that community involvement in the project has increased satisfaction in project operations.
55		No vehicular accidents	Compliant	<ul style="list-style-type: none"> • no vehicular accidents have occurred.

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
56	Health, Safety and Risk (Livelihood and wellbeing of local communities and towns) Minimise safety risks to the public and other third parties	<ul style="list-style-type: none"> Undertake an open and transparent risk assessment process and ensure that all risks are managed in an acceptable manner 	Compliant	<ul style="list-style-type: none"> Section 5 of the EMP outlines the open and transparent risk assessment process that formed the section 6 of the EMP risk assessment. In this risk assessment the risks are examined and mitigated to appropriate levels. On site, daily, weekly and monthly reviews of work were undertaken at different levels of risk examination. These risks were examined, reviewed and mitigated as appropriate.
57		<ul style="list-style-type: none"> Ensure that risk is managed to meet current government standards. 	Compliant	<ul style="list-style-type: none"> Section 5 of the EMP outlines the open and transparent risk assessment process that formed the section 6 of the EMP risk assessment. In this risk assessment the risks are examined and mitigated to government standards On site, daily, weekly and monthly reviews of work were undertaken at different levels of risk examination. These risks were examined, reviewed and mitigated to meet government standards as appropriate.
58		<ul style="list-style-type: none"> An absence of issues raised by the community as indicator for successful communication 	Compliant	<ul style="list-style-type: none"> No complaints relating to the projects operations have been received by Imperial.
59		<ul style="list-style-type: none"> No unresolved complaints 	Compliant	<ul style="list-style-type: none"> Not applicable.

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence
60		<ul style="list-style-type: none"> The community is highly consulted with and all comments provided are assessed and those viable implemented 	Compliant	<ul style="list-style-type: none"> All interactions with community members as part of stakeholder engagement and as part of the ongoing operations of the project have provided positive feedback. When community have reached out for incorporation with Imperial their services have been included into the project scope. for example, <ul style="list-style-type: none"> Imperial engaged the Heart Break Hotel and Leila Creek Station to provide accommodation and catering during the operation. Local helicopter services used for ongoing environmental monitoring. traffic management crew sourced from local providers. Fuel and other resources for the program was sourced from local vendors
61		High level of satisfaction by the community	Compliant	<ul style="list-style-type: none"> All interactions with community members as part of stakeholder engagement and as part of the ongoing operations of the project have provided positive feedback
62		No vehicular accidents	Compliant	<ul style="list-style-type: none"> No vehicular accidents recorded.



2.3 Compliance with Mandatory Reporting Requirements

Table 4 demonstrates Imperials compliance with reporting requirements in The Code and interest holder’s compliance with 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 has been provided. Where relevant, Imperial has also confirmed that all records, monitoring or required reporting under the Petroleum (Environment) Regulations 2016 (NT)² has been provided to DEPWS or the relevant NTG agency.

Table 5 - Compliance with Mandatory Reporting Requirements

No	Reference	Requirement	Compliance Status	Evidence
1	The Code cl A.3.5	Geospatial information depicting areas cleared is to be provided to the Minister.	Compliant	Geospatial Files sent to DEPWS on 30/06/2020
2	The Code cl A.3.6 (b)	Weed management plan developed as part of the EMP must provide for ongoing weed monitoring.	Compliant	Weed Management Plan developed in conjunction with the DEPWS, Weed Management Branch, Onshore Petroleum Weed Management Officer. See Appendix 13 of the approved EMP
3	The Code cl A.3.7(a)vi	The fire management plan developed as part of the EMP must provide for annual fire mapping to monitor changes to fire frequency in the relevant areas.	Partially Compliant	Fire regime was mapped for the period of 2000 to 2018 prior to operations taking place. EMP section 5.2.14 Fire Regime developed prior to operations. No inclusion to annual fire mapping to monitoring changes to the fire frequency was mentioned in the EMP post operations. As operations ran from 2/10/19 to the 12/11/19 it was understood that no fire mapping was mandatory post operational timelines.
4	The Code cl A.3.9(c)	The rehabilitation plan developed as part of the EMP requires progressive rehabilitation of significantly disturbed land which is required	Compliant	Rehabilitation plan as per section 4.3.9 of the approved EMP. Includes.

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

No	Reference	Requirement	Compliance Status	Evidence
	The Code cl A.3.9(e)	to commence no longer than 12 months following the cessation of activities on the land. It also requires regular maintenance and annual monitoring of rehabilitated areas.		<ul style="list-style-type: none"> Progressive rehabilitation of significantly disturbed land, which is to commence immediately after recording. Including regular maintenance and annual monitoring of rehabilitated areas.
5	The Code cl B.4.13.2(c)	<p>As a minimum, the following must be recorded and reported for each stage (where a stage in this context means all fluids pumped at a particular depth interval):</p> <p>a) total volume of hydraulic fracturing fluid pumped,</p> <p>b) quality of water used (tested for analytes in section C.8 of The Code. Analyses do not need to be repeated if the same water source is used for multiple stages) and typical and maximum concentrations of chemicals or other substances used</p>	N/A	This seismic operation required no Hydraulic Fracturing Fluid required for this operation.
6	The Code cl B.4.13.2(k)iv	Where venting is the only technically feasible option for managing produced gas, the technical considerations preventing the use of the recovered gas must be recorded and included in the operator's annual report.	N/A	This seismic operation incorporated no well operations and no subsequent venting.
7	The Code cl B.4.14.2(c)	All new barriers or new well operating envelopes must be verified and clearly documented and reported by submission of	N/A	This seismic operation required no well operations and therefore no WBIV report.



No	Reference	Requirement	Compliance Status	Evidence
		an updated well barrier integrity validation (WBIV) report to DITT.		
8	The Code cl B.4.15.2(j)	Complete and accurate records of the entire decommissioning procedure must be kept, with these records submitted as part of the legislative reporting requirements for the decommissioning of petroleum wells	N/A	This seismic operation incorporated no well operations.
9	The Code cl B.4.17.2(d)	Any guidelines published by the Northern Territory Government from time to time relating to reporting and data submission, and groundwater monitoring data standards must be followed.	Compliant	<p>Imperial followed the following guidelines and</p> <ul style="list-style-type: none"> • NT Land Clearing Guidelines (LCG), 2019 • NT DITT Onshore oil and Gas Guiding Principles • International Erosion Control Association Australasia: Erosion and Sediment Control Guidelines IECA 2008 • Guidelines for Assessment of Impacts on Terrestrial Biodiversity. • Guidelines for the Preparation of an Economic and Social Impact Assessment. • Guideline Dep't of Health Environmental Health Guidelines for Private Water supplies January 2012 • Environmental Assessment Guidelines – Development proposals submitted under the Planning Act. • APPEA Environmental Incident Database Guidelines, November 2001

No	Reference	Requirement	Compliance Status	Evidence
				<ul style="list-style-type: none"> Vegetation Retention Technical Note No. 12 Erosion and Sediment Control Guidelines. DLRM Clearing Methodology Technical Note No. 18 Erosion and Sediment Control Guidelines DLRM
10	The Code cl C.3(e)	The components of the wastewater management framework include: Monitor, manage and report in accordance with the Wastewater Management Plan and Spill Management Plan.	N/A	This seismic operation incorporated no wastewater as defined under The Code.
11	The Code cl C.6.1(d)	Wastewater tracking documentation must be reported to the Minister at least annually in accordance with the framework (Spill Management Plan and Wastewater Management Plan) outlined in the EMP	N/A	This seismic operation incorporated no wastewater as defined under The Code.
12	The Code cl C.7.1(d)ii	Wastewater Management Plan must include a program for monitoring and reporting against the effectiveness of the measures for the mitigation of interaction with wildlife, stock and human receptors with wastewater.	N/A	This seismic operation incorporated no wastewater as defined under The Code.
13	The Code cl D.4.3.2(f)	A written report detailing the levels of methane measured, the duration of the unusual readings and the results of the investigation (including remedial actions) must be submitted within one month of the significantly higher-level methane event being detected.	N/A	This seismic operation incorporated no well operations.
14	The Code cl D.5.9.2(c)	Emissions from exploration, well construction (including during flowback) and workovers must be measured, and reports submitted.	N/A	This seismic operation incorporated no well construction.



No	Reference	Requirement	Compliance Status	Evidence
15	The Code cl D.5.9.3(a)	Where natural gas is vented or flared at a gas processing or other downstream facility, emissions must be estimated and reported.	N/A	This seismic operation incorporated no venting or flaring.
16	The Code cl D.6.1	All mandated government reporting is complied with; and all detectable leaks and emissions are reported on an annual basis.	Compliant.	Emission Report 2020 for the Seismic operations was submitted on the 15/12/2020 to DEPWS.
17	The Code cl D.6.2(a)	Reports of baseline assessments must be submitted at the conclusion of each field campaign.	N/A	Part D of The Code is in relation to Methane emissions monitoring, leak management, detection and reporting. Imperial undertook no upstream methane emissions from wells, processing facilities and other infrastructure associated with gas production in onshore shale gas fields for this seismic operation. As a result of this there was no requirement for the baseline assessment and submission to occur.
18	The Code cl D.6.2(b)	Emissions reporting must be in accordance with Section D.5.6. Emissions associated with venting and flaring as described in Section D.5.9 must be provided separately to the Northern Territory Government in accordance with The Code.	N/A	This seismic operation incorporated no activity which would require emissions reporting under Section 5.6 or Section 5.9
19	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.	Compliant	As per section 4.3.9 of the EMP “Imperial will submit a final Environmental Report to DITT and DEPWS in accordance with the Environmental Closeout Procedures for Petroleum Activities (DITT 2016)”. As rehabilitation monitoring is still being undertaken. This

No	Reference	Requirement	Compliance Status	Evidence
				regulation is compliant and the EMP is still in force.
20	EMP s8 Stakeholder Engagement Schedule 1, item 9(2)	Interest holders are required to conduct future engagement with stakeholders, in accordance with the description in the EMP.	Compliant	EMP conditions met. Imperial has undertaken prior, during and post consultation with stakeholders and continues to meet with stakeholders. Post operational on country meeting was had with Traditional Owners the week starting 9 November 2020. No objections or issues was raised from this interaction. Pastoralist interactions ongoing.
21	Reg 33	DEPWS is notified of reportable incidents within 2 hours of the interest holder becoming aware of the incident, or within 2 hours of the incident occurring. A written report must be provided within 24 hours if the initial report was made orally.	N/A	N/A as no reportable incidents occurred.
22	Reg 34	Reports on reportable incidents are to be provided to DEPWS as soon as practicable and within 72 hours of the event occurring. A final report must be provided to DEPWS within 30 days after remediation/cleanup of the affected area.	N/A	N/A as no reportable incidents occurred.
23	EMP s 7.4.1 Reporting Reg 35	A written report of all recordable incidents must be provided to DEPWS not later than 15 days after the 90-day reporting period (unless otherwise agreed).	Partially Compliant	The Quarterly reporting period of 2020-21 Quarter 1: July to September 2020 was submitted 30 November, which is inside the EMP approval date for the quarter. This item has been marked as partially compliant as the common understanding of Regulation 35 developed between

No	Reference	Requirement	Compliance Status	Evidence
				DEPWS and Imperial. Due to this development, there were no Quarterly reports submitted for the periods of 1 January to 31 March 2020, and 1 April to 30 June 2020
24	Reg 37A	A report about flowback fluid from hydraulic fracturing must be provided to the Minister within 6 months of the flowback occurring.	N/A	This seismic operation included no hydraulic fracturing activities.
25	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.	N/A	This seismic operation included no hydraulic fracturing activities.
26	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.	Compliant	Emails were sent on commencement prior to operations to DEPWS, DITT and the landowners 28/09/19
27	EMP Section, 4.3.8 Rehabilitation Activities And, 4.3.9.1. Rehabilitation Activities	The monitoring stations will be photographed pre line preparation, post seismic acquisition and post wet season with a follow up in 12 months to show the changes resulting from the planned works. And A series of photos will be taken from a fixed location at regular intervals with the aim of visually showing improvement in vegetation condition. The monitoring stations will be photographed pre line preparation, post seismic acquisition and post wet season follow up in 12 months to show the changes resulting from the planned works. The same field of view inclusive of	Partially Compliant	Photo point monitoring undertaken at the following periods. <ul style="list-style-type: none"> • August 2019 pre line preparation • November 2019 post seismic acquisition • March 2020 post wet season (postponed) • June 2020 • December 2020 follow up in 12 months. This requirement is partially compliant. The February rehabilitation progress assessment was postponed. Notification



No	Reference	Requirement	Compliance Status	Evidence
		the original bearing and reference points will be maintained.		was sent to DEPWS of the delay on the 5/3/2020, 17/4/2020.
28	EMP Section 7.5.1.17. Rehabilitation Plan	Rehabilitation audit by independent suitably qualified person (SQP) following rehabilitation works. Report will be provided to DEPWS within 2 weeks of the audit	N/A	Rehabilitation Audit not yet undertaken.
29	EMP Section 7.6.1. Routine Reporting	During operations a weekly report shall be forwarded to the Director and DEPWS stating progress of the survey. When a survey has been completed, a summary stating the start and completion dates and the number of kilometres or samples acquired shall also be forwarded.	Compliant.	Weekly operations reports were sent to DITT and DEPWS stating progress of the survey, when the survey has been completed and a summary stating the start and completion dates and the number of kilometres or samples acquired has also been forwarded. Weekly reports were sent to DITT and DEPWS on the following dates. 14/10/2019 21/10/2019 28/10/2019 04/11/2019 11/11/2019 18/11/2019 25/11/2019
30	EMP Table 15. Environmental Management Risk Assessment	Release of chemical/hazardous materials will be reported to the DEPWS as required	Compliant	No release of chemicals occurred during operations.

No	Reference	Requirement	Compliance Status	Evidence
31	EMP Section 7.5.1.16. Bushfire Management Plan	In the event of an accidental ignition will be reported to the property manager	Compliant	Property managers notified of accidental ignitions. 15/10/19 29/10/19
32	EMP Section 7.6.1. Routine Reporting	In accordance with Part V Geophysical and Geological Surveying of the Schedule of onshore petroleum exploration and production requirements Division 2 section 512, a weekly report shall be forwarded to the Director and DEPWS stating progress of the survey.	Compliant	Weekly operations reports were sent to DITT and DEPWS stating progress of the survey, when the survey has been completed and a summary stating the start and completion dates and the number of kilometres or samples acquired has also been forwarded. Weekly reports were sent to DITT and DEPWS on the following dates. 14/10/2019 21/10/2019 28/10/2019 04/11/2019 11/11/2019 18/11/2019 25/11/2019
33	EMP Section 7.6.1. Routine Reporting	On completion of the activity a written report of the activity and interpretation of the results shall be forwarded to the Director within 12 months of the completion date of the acquisition and shall include..	Compliant	Annual Report Requirements and data sent to the Director of Petroleum Tenure, 24/06/2020
34	EMP Section 7.6.2. Incident Reporting	In accordance with the "Schedule of Onshore Petroleum Exploration and Production Requirements 2017" (Part II, Division 3 -	Compliant	Compliant as no reportable injuries occurred.



No	Reference	Requirement	Compliance Status	Evidence
		Reporting) a report will be issued as required under the regulations for the reporting of death and Serious Injury, Serious damage, and a potentially hazardous event where the event is not in the normal or ordinary course of operations and where damage that occurs to property that results in loss of structural integrity or load bearing capacity or some other significant unsafe condition occurs.		

3. Summary of Compliance

3.1. Overview of Compliance

Table 5 provides a summary of the results of the compliance assessment against the 50 total compliance items.

Table 6 - Overview of Compliance

Indicator	Number	Percentage
Compliant	76	73.8%
Partially Compliant	8	7.8%
Not Compliant	0	
Not Applicable	19	18.4%

Total of 103.

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 partial 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 Ministerial Approval Conditions

3.2.1.1 Description

Ministerial Condition 2

The interest holder must submit to DEPWS a timetable for the regulated activity prior to commencement of the activity and update the timetable each month. Specific monthly letters were not sent, but a higher level of reporting, through written and verbal meetings were held/undertaken to ensure that DEPWS were fully aware of the progress of operations.

Ministerial Condition 3, I, II and III

Condition 3: The Interest Holder must provide to DEPWS within 3 months of completion of the regulated activity:

- I. High resolution aerial imagery of the disturbance area
- II. Digital aerial photography of UAV imagery ortho-rectified using ground control points measured using a differential GPS (DGPS) and spatial accuracy of approximately 1-2 meters.
- III. A spatial assessment report on the disturbance footprint for the approved regulated activity

Initial Condition requirements were submitted post initial timeline of Condition 3. A requested resubmission extension time was met on the 30 June.

Ministerial Condition 4, II

A rehabilitation monitoring report detailing alternative methodologies for monitoring the progress of rehabilitation, including the use of remote sensing monitoring using high resolution satellite imagery.

Application was made detailing alternative methodologies for monitoring the progress of rehabilitation have been submitted to DEPWS on the 8 November 2020. This compliance status has been marked as a partially compliant as a report of these alternative methodologies for monitoring was not submitted to DEPWS.

3.2.1.2 Analysis of Potential Environmental Harm or Impact

Ministerial Condition 2

No potential environmental harm or impact occurred as a result of this partial compliance.

Ministerial Condition 3, I, II and III

No potential environmental harm or impact occurred as a result of this partial compliance.

Ministerial Condition 4, II

No potential environmental harm or impact occurred as a result of this partial compliance.

3.2.1.3 Corrective Actions

Ministerial Condition 2

Specific monthly letters were not sent, while Imperial undertook a higher level of reporting to inform and ensure that DEPWS were fully aware of the progress of operations given the short period of operations there was still a misunderstanding in the ministerial condition that required a written letter to be submitted. To avoid this partial compliance in future operations Imperial will ensure

that specific formats are sent to DEPWS when required and not rely on other forms of communication as suitable to meet the specific ministerial conditions.

Ministerial Condition 3, I, II and III

It is understood that these timelines are chosen by the minister and must be complied with. Having missed the initial time frame for submission of documentation Imperial has placed greater importance meeting timelines for data submission.

Ministerial Condition 4, II

A rehabilitation monitoring report detailing alternative methodologies was not submitted to DEPWS. While an electronic mail application was made detailing alternative methodologies for monitoring the progress of rehabilitation on the 8 November 2020 this was not the explicit requirement of the ministerial condition. To avoid this partial compliance in future operations Imperial will ensure that specific formats are sent to DEPWS as required in ministerial approvals when required and not rely on other forms of communication to meet the requirements of the ministerial conditions.

3.2.1. Regulatory Reporting

3.2.411. Description

From Table 5 - Compliance with Mandatory Reporting Requirements.

No 3 - The fire management plan developed as part of the EMP must provide for annual fire mapping to monitor changes to fire frequency in the relevant areas. Fire regime was mapped for the period of 2000 to 2018 prior to operations taking place. EMP section 5.2.14 Fire Regime developed prior to operations. No inclusion to annual fire mapping to monitoring changes to the fire frequency was mentioned in the EMP post operations. As operations ran from 2/10/19 to the 12/11/19 it was understood that no fire mapping was mandatory post operational timelines. This has since become aware to Imperial that this must be included in the Fire Management Plan.

No 23 - A written report of all recordable incidents must be provided to DEPWS not later than 15 days after the 90-day reporting period (unless otherwise agreed). The Quarterly reporting period of 2020-21 Quarter 1: July to September 2020 was submitted 30 November, which is inside the EMP approval date for the quarter. This item has been marked as partially compliant as the common understanding of Regulation 35 developed between DEPWS and Imperial. Which has resulted in the requirement for all active EMPs to provide a Quarterly report even when no operations are being undertaken. Due to this development, there were no Quarterly reports submitted for the periods of 1 January to 31 March 2020, and 1 April to 30 June 2020

No 27 - Monitoring stations will be photographed pre line preparation, post seismic acquisition and post wet season with a follow up in 12 months to show the changes resulting from the planned

works. A series of photos will be taken from a fixed location at regular intervals with the aim of visually showing improvement in vegetation condition. The monitoring stations will be photographed pre line preparation, post seismic acquisition and post wet season follow up in 12 months to show the changes resulting from the planned works. The same field of view inclusive of the original bearing and reference points will be maintained.

Photo point monitoring planned to be undertaken at the following periods.

- August 2019 pre line preparation
- November 2019 post seismic acquisition
- March 2020 post wet season (postponed)
- June 2020
- December 2020 follow up in 12 months.

This requirement is partially compliant.

The February/March rehabilitation progress assessment was postponed due to Covid-19 travel restrictions and the inability to have staff travel and access site. Notification was sent to DEPWS of the delay on the 5/3/2020 and 17/4/2020. For this reason, full quarterly photo point monitoring wasn't achieved, and a partially compliant status was given.

3.2.4.2. Analysis of Potential Environmental Harm or Impact

From Table 5 - Compliance with Mandatory Reporting Requirements.

No 3 – No direct environmental harm or impact occurred due to the lack of annual fire mapping to monitoring changes to the fire frequency or its mentioned inclusion in the EMP.

No 23 – No direct environmental harm or impact occurred due to the lack of quarterly reporting over the 1 January to 31 March 2020, and 1 April to 30 June 2020 periods.

No 27 - No direct environmental harm or impact occurred due to the delay in site progress assessment. Assessment of site conditions in June found no signs against the environmental performance objectives to have occurred. The potential environmental harm would be that of weeds or erosion activity that was not pre-emptively actioned prior to the June reporting visit. However, since no signs against the environmental performance objectives were found in the June inspection there was no direct environmental harm or impact to have occurred.

3.2.4.3. Corrective Actions

From Table 5 - Compliance with Mandatory Reporting Requirements.

No 3 – Imperial has taken on board this item and committed to undertaken annual fire mapping in all future EMPs as it is a mandatory item in the Code. This has resulted in an operational Area EP187 fire mapping review annually.

No 23 – Imperial has scheduled all quarterly reporting for all active EMPs to ensure that all quarterly reporting is undertaken.

No 27 – The rehabilitation assessment was undertaken as soon as Covid-19 restrictions were lifted. Imperial have also begun to explore options for local environmental assessment consultants to streamline assessment requirements.

3.3. Application of Lessons Learned Across Imperial Onshore Interests

Applications learned from partial compliances include the following.

- Review of approval notices and ministerial conditions for exact wording, timelines and reporting specifications for all future operations.
- Fire management review periods will be undertaken on an Exploration Permit wide annual basis and will be included in future EMP mentions.
- Quarterly annual reporting is a requirement for all Active EMPs and should be reported on even if there are no incidences or active operations.
- Imperial to promote more NT based consultancies to undertake operations.