



Imperial Oil and Gas Pty Ltd

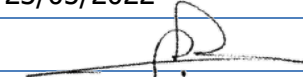
Environment Management Plan

Imperial 2020-21 Drilling Program NT Exploration Permit (EP) 187 (IMP2-6.1)

2 March 2021 to 30 September 2022

Date	Revision	Reason for Issue	Author	Checked	Approved
16/05/22	0	Initial Revision	CD	JB	
23/05/22	1	Final Submission	CD	TS	JWB
24/07/23	2	Resubmission	RL	TS	RP

Document title	AEPR 2-6.1 2021-2022
EMP title	Imperial 2020-2121 Drilling Program NT Exploration Permit (EP) 187 (IMP2-6.1)
Exploration Permit/Licence Number	EP187
Interest holder details	Imperial Oil & Gas Pty Limited Level 19, 20 Bond Street, Sydney NSW 2000 ABN 92002699578
Operator details	Imperial Oil & Gas Pty Limited Level 19, 20 Bond Street, Sydney NSW 2000 ABN 92002699578

Signature and Certification	
I certify on behalf of Imperial Oil and Gas Pty Ltd this document is a true and accurate record of performance.	
Signature	<i>Charles Dack</i>
Position	Environmental Compliance Reporting Officer, Empire Energy
Date	23/05/2022
Signature	
Position	Chief Financial Officer
Date	24/07/2023

Acronyms / Terms	Definition
AEPR	Annual Environment Performance Report
Code	Code of Practice: Onshore Petroleum Activities in the Northern Territory
DEPWS	Department of Environment, Parks and Water Security (NT)
DITT	Department of Industry, Tourism and Trade (NT)
EMP	Environment Management Plan
EP	Exploration Permit
NT	Northern Territory
Regulations	Petroleum (Environment) Regulations 2016 (NT)
WBIV	Well Barrier Integrity Validation

Contents

1. Introduction	1
1.1. Background	2
1.2. Contents of performance report.....	3
1.3. Assessment of performance	3
1.4. Evidence of performance.....	3
2. Demonstration of Performance	3
3. Overall Performance.....	19
3.1. Overview of performance.....	19
3.2. Overview of non-compliant items	19
3.2.1. Ministerial approval conditions.....	19
3.2.1.1. Description.....	19
3.2.1.2. Analysis of potential environmental harm or impact.....	19
3.2.1.3. Corrective actions	20
3.2.2. Environmental Performance Standards.....	20
3.2.2.1. Description.....	20
3.2.2.2. Analysis of potential environmental harm or impact.....	20
3.2.2.3. Corrective actions	20
3.3. Application of Lessons Learnt	21

Figure

Figure 1 Location of the Carpentaria -1 well pad in relation to EP187	2
---	---

Tables

Table 1: Performance Descriptors	3
Table 2: Compliance with Ministerial EMP Approval Conditions.....	3
Table 3: Compliance with Environmental Outcomes and Environmental Performance Standards	8
Table 4: Compliance with Reporting and Monitoring Requirements	14
Table 5: Performance Summary.....	19

1. Introduction

The Northern Territory (NT) Petroleum (Environment) Regulations 2016 (NT) (the Regulations) require an interest holder to provide a report to the Minister for Environment on an annual basis that outlines the environmental performance of the interest holder¹ (the Annual Environment Performance Report). The report must include sufficient information to allow the Minister to assess whether the interest holder has met the environmental outcomes and environmental performance standards included in the approved Environment Management Plan (EMP). This report considers 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 Environment Performance Report (AEPR) applies to the following EMP:

- *Imperial 2020-21 Drilling Program NT Exploration Permit (EP) 187 (IMP2-6.1)* that was approved on the 30 September 2020
 - *Hereafter referred to as the EMP*

The period covered by this AEPR is from 2 March 2021 to 30 September 2022. This timeline was used because the initial IMP2-04 was approved on 2 March 2020, but was superseded by IMP2-6.1. This AEPR now aligns with the approval notice date of IMP2-6.1.

Timeline of the regulated activities as described in the EMP:

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

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

1.1. Background

The EMP was approved on 30 September 2020.

The regulated activities covered under this EMP included:

- Civil construction of access tracks, well sites and accommodation camp
- Drilling of up to two wells

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

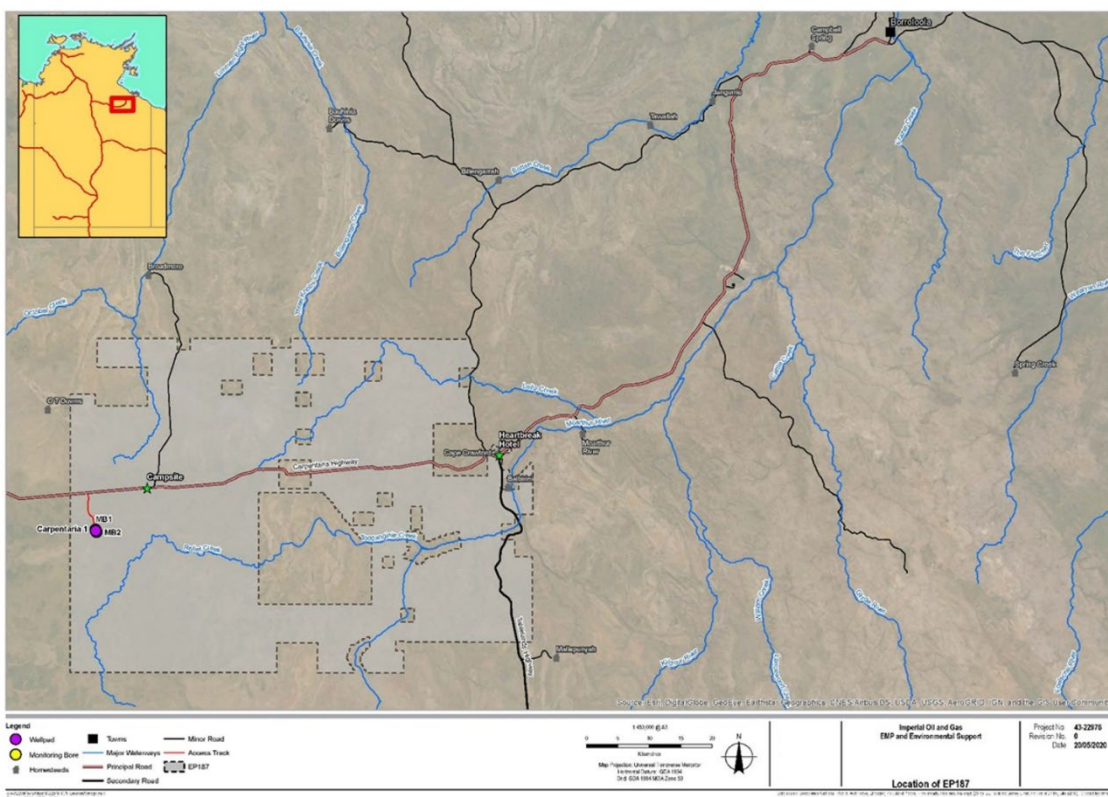


Figure 1 Location of the Carpentaria -1 well pad in relation to EP187

1.2. Contents of performance report

This AEPR describes the environmental performance of Imperial Oil & Gas Pty Limited (Imperial) by evaluating 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 Regulations
4. all recordable and reportable incidents, including root cause analysis and related corrective actions to prevent re-occurrence
5. findings of any regulatory inspections and audits and related actions to address any findings.

1.3. Assessment of performance

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

Table 1: Performance Descriptors

Indicator	Description
Compliant	Compliant with the requirement for the entire 12-month reporting period
Not Compliant	The interest holder did not comply with the requirement during the reporting period
Not Applicable	Requirement not applicable during the reporting period

1.4. Evidence of performance

The following sources of evidence are used to demonstrate compliance:

1. Internal assessment of compliance through verification of:
 - Weekly monitoring inspections, inductions, incident, operational and landholder consultation records and reports
2. Recordable incident reports submitted to DEPWS
3. Reports provided to DEPWS, the DITT and other government agencies

2. Demonstration of Performance

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

Table 2: Compliance with Ministerial EMP Approval Conditions

No	Ministerial Condition	Performance Status	Evidence
1	<p>Condition 1: Prior to commencement of activities on the Carpentaria-2 well site, the interest holder must provide to the Department of Environment, Parks and Water Security (DEPWS), at least 4 weeks prior to commencement of the regulated activity:</p> <ul style="list-style-type: none"> • a detailed map and geo-reference location of the final Carpentaria-2 well site on EP187 selected, as referenced in the EMP • a geotechnical assessment report for the Carpentaria-2 well site, developed by a suitably qualified independent person, that: <ul style="list-style-type: none"> - includes results of 60cm soil cores, taken at three sites across the well pad area for analysis of particle size distribution. - determines the amount of excavation and quantity of surface material that will be required to be stripped at the well pad to ensure a stable base. - determines stockpiling requirements of stripped material; and - determines the amount of suitable gravel material required to build the well pad. 	N/A	Not applicable to this EMP. Carpentaria-2 wellsite occurred under the operation of EMP IMP4-3, not this EMP.

No	Ministerial Condition	Performance Status	Evidence
2	Condition 2: The interest holder must provide to the DEPWS an updated timetable for the regulated activity prior to commencement of the activity and provide an updated timetable to the DEPWS each month following commencement.	N/A	Not applicable. No regulated activity occurred under this EMP in the AEPR period. Civil works is managed under IMP3-4.
3	Condition 3: In support of Schedule 1, item 11 of the Regulations and clause A.3.5 of the Code, the interest holder must provide geospatial files of the land disturbance footprint(s) to DEPWS within sixty (60) days of completion of each land clearing activity or within 6 months of approval of this EMP, whichever occurs first.	N/A	Not applicable to this EMP. No land disturbance occurred under this EMP in the AEPR period.
4	Condition 4: The interest holder must provide to DEPWS a cementing report for the 13-3/8" and 9 5/8" casing strings as soon as practicable but not more than 14 days after completion of the cementing job for the Carpentaria-1 and Carpentaria-2 wells on EP 187	N/A	Not applicable to this EMP. No Cementing occurred under this EMP during this AEPR period.

No	Ministerial Condition	Performance Status	Evidence
5	<p>Condition 5: The interest holder must provide to DEPWS within six weeks of completion of drilling operations at the Carpentaria -1 well site, a laboratory analysis of drilling wastewater that may be contained in the drilling sump. The laboratory analysis must comply with the Code of Practice: Onshore Petroleum Activities in the Northern Territory, Table C.8: Wastewater chemistry analytes.</p>	N/A	Not applicable to this EMP. Drilling of Carpentaria-1 was carried out prior to this AEPR period.
6	<p>Condition 6: In addition to the minimum methane leak detection inspection frequencies required by the Code, the interest holder must undertake methane leak detection within seven (7) days of commissioning equipment that is in hydrocarbon service and under pressure and record to an auditable standard.</p>	N/A	Not applicable to this EMP. No equipment that is in hydrocarbon service and under pressure was commissioned.

No	Ministerial Condition	Performance Status	Evidence
7	<p>Condition 7: The interest holder must provide an annual report to DEPWS on its environmental performance, in accordance with item 11(1)(b) in schedule 1 of the Petroleum (Environment) Regulations 2016 (NT). The first report must cover the 12-month period from the date of this approval and be provided within three calendar months of the end of the reporting period. The annual environmental performance report must align with the template prepared by DEPWS for this purpose and must include a signed declaration by the interest holder or operator.</p>	<p>Not Compliant</p>	<p>This Annual Environment Performance Report has been provided to DEPWS in accordance with item 11(1)(b) in schedule 1 of the Petroleum (Environment) Regulations 2016 (NT). It was originally reported March 2021- March 2022 which is not compliant with IMP2-6.1 Ministerial Condition 7. The report has been revised to the period of March 2021- September 2022 to realign with the correct reporting period.</p>

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

Table 3: Compliance with Environmental Outcomes and Environmental Performance Standards

No	Environmental Values	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence	Environmental harm or Impact
1	Asset Integrity		No uncontrolled releases	Compliant	<ul style="list-style-type: none"> No uncontrolled releases were recorded in operational reports 	Not Applicable
2	Protection of the ecosystem and human health values from uncontrolled discharges associate with asset integrity failures	Minimise impacts to ecosystem and human health values	No asset integrity failures	Not Compliant	<ul style="list-style-type: none"> Q3 Recordable Incident Report 1 July 2021 – 30 September 2021 submitted to DEPWS, recorded a section of the sedimentation fence missing. 	No environmental impact observed due to fence failure.
3	Chemicals and Hazardous Materials	Minimise impacts to ecosystem and human health value	No uncontrolled releases of chemicals and hazardous materials	Compliant	<ul style="list-style-type: none"> No uncontrolled releases of chemicals and hazardous materials were recorded in operational reports 	Not Applicable
4	Protection of the ecosystem and human health values from uncontrolled releases of chemicals and hazardous materials		No incorrect storage and use of chemicals and hazardous materials	Compliant	<ul style="list-style-type: none"> No incorrect storage and use of chemicals and hazardous materials were recorded in operational reports 	Not Applicable
5	Waste Management	<ul style="list-style-type: none"> Minimise impacts on soil, surface water, groundwater, sensitive habitat and air quality Minimise creation of food sources or habitat for pest species Minimise waste generation through reduce, reuse, recycle programs 	Absence of domestic waste remaining onsite at completion of activities (i.e., general rubbish, waste chemicals, workshop wastes including oily rags, containers etc.)	Compliant	<ul style="list-style-type: none"> Inspections post operational activities confirmed an absence of domestic waste remaining onsite 	Not Applicable
6	<ul style="list-style-type: none"> Maintain the integrity of ecosystems and agricultural productivity Minimise the amount of waste generated 		No unregulated waste handling	Compliant	<ul style="list-style-type: none"> All waste handled as to the Northern Territory Waste Management Pollution Control Act No regulated waste has left the site under this EMP during the AEPR period 	Not Applicable
7			All waste certificates to be noted and accounted for	N/A	<ul style="list-style-type: none"> No waste transferred under this EMP during the AEPR period 	Not Applicable
8			Pest species not encouraged to the site	Compliant	<ul style="list-style-type: none"> Inspections post operational activities confirmed an absence of domestic waste remaining onsite 	Not Applicable

No	Environmental Values	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence	Environmental harm or Impact
9	Erosion and Sediment Control · Suitability and stability of land for existing uses (Erosion and Sediment Controls implemented) · Stability of land to preserve existing water quality, landscapes and ecosystems	· Minimise disturbance to land and land use (including soils and terrain, flora and fauna) · Minimise erosion (via water or wind) and sediment releases · Protection of waterways · Return disturbed areas to a stable landform such that they are returned to a condition as close as practicable to the surrounding area (or pre-disturbance state) within an acceptable time frame. · Protect the productivity of the land for its intended land use	Land disturbance equal to or less than planned	N/A	<ul style="list-style-type: none"> No Land disturbance occurred under this EMP during the AEPR period 	Not Applicable
10			Minimum incidences of erosion and sedimentation occurring	Compliant	<ul style="list-style-type: none"> Only minimal incidents of erosion were recorded in the operational reports (Weekly Report 7 March 2021, Weekly Report 21 March 2021) 	Minimal
11			Areas left safe, stable and non-polluting	Compliant	<ul style="list-style-type: none"> Operational reporting of the Carpentaria-1 well pad confirmed areas left safe, stable and non-polluting 	Not Applicable
12			Commence to rehabilitate disturbed areas within 12 months of decommission	N/A	<ul style="list-style-type: none"> Decommissioning has not occurred 	Not Applicable
13			No new erosion flow paths originated from site	Compliant	<ul style="list-style-type: none"> Weekly inspections confirmed no new erosion flow paths originated from site 	Not Applicable
14			No flow on effects caused by flooding at Imperial's drilling sites	N/A	<ul style="list-style-type: none"> No flooding occurred at Carpentaria-1 	Not Applicable
15	Decommissioning and Rehabilitation Management · Maintain the integrity of significant ecosystems and agriculture productivity · Maintain habitat elements for native flora and fauna, including species protected by EPBC Act and TPWC Act	· A safe, stable landform consistent with surrounding land use · Rehabilitation of disturbed areas is returned to the original land use and is consistent with the adjacent analogue site	Successful rehabilitation to a similar condition of surrounding environment	N/A	<ul style="list-style-type: none"> Rehabilitation has not been commenced on site 	Not Applicable
16			No further habitat loss resulting from Imperial's activities	N/A	<ul style="list-style-type: none"> Rehabilitation of site not undertaken. 	Not Applicable
17			Decommissioning of redundant assets	N/A	<ul style="list-style-type: none"> No redundant assets exist on site 	Not Applicable

No	Environmental Values	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence	Environmental harm or Impact
18	Biosecurity Management · Maintain the integrity of significant ecosystems and agriculture productivity	· Avoid the introduction of weeds and pest fauna · Avoid the spread of existing weeds and pest fauna	No introduction or spread of declared weeds and/or pest fauna resulting from Imperial's activities	Compliant	<ul style="list-style-type: none"> Weekly inspections confirmed no new weeds or pest's species originating from site Yearly environmental inspection by Fox and Co confirmed no introduction or spread of declared weeds resulting from Imperials activities. Report Dated March 2022 	Not Applicable
19	Biodiversity Management · Maintain the integrity of significant ecosystems and agriculture productivity · Maintain habitat elements for native flora and fauna, including species protected by EPBC Act and TPWC Act	· Minimise disturbance to flora and fauna · Minimise disturbance to sensitive areas	Monitoring EP187 area to minimise impacts to fauna habitat and sensitive vegetation	Compliant	<ul style="list-style-type: none"> Yearly environmental inspection by Fox and Co confirmed monitoring undertaken to minimise impacts to habitat and sensitive vegetation Report Dated March 2022 	Not Applicable
20	· Avoid clearing high value habitat		No native fauna impacts (injury or fatality)	Not Compliant	<ul style="list-style-type: none"> Q3 Quarterly Recordable Report 1 July 2021 to 30 September 2021 recorded a deceased Crested Pigeon and Red Flying Fox Bat on the 30 September 2021. This report was previously submitted to DEPWS. 	Deceased native animals.
21			No loss of sensitive vegetation resulting from Imperial's activities	Compliant	<ul style="list-style-type: none"> Yearly environmental inspection by Fox and Co confirmed No loss of sensitive vegetation resulting from Imperial's activities under this EMP. Report Dated March 2022 	Not Applicable

No	Environmental Values	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence	Environmental harm or Impact
22	Bushfire Prevention · Maintain a natural fire regime of the region · Protection of public, private infrastructure and equipment	· Minimise the risk of causing bushfires from Imperial's activities · Minimise impacts on environmental habitat and fauna, soil erosion, impacts on stakeholders, impacts on culturally significant sites, public infrastructure and community lands · Prevent accidental fire risk and ensure safe storage of chemicals	Successful fire management will be indicated by having no uncontrolled fires occurring as a result of Imperial's drilling activities	N/A	<ul style="list-style-type: none"> No Imperial drilling activities occurred under this EMP during the AEPR period 	Not Applicable
23	Air Quality Protection Measures · Rural air environment with qualities conducive to suitability for the life, health and wellbeing of humans and ecosystems	· Minimise environmental nuisance due to dust for sensitive receptors resulting from Imperial's activities	No complaints regarding dust/air quality	Compliant	<ul style="list-style-type: none"> No complaints on the complaints register 	Not Applicable
24	· Rural air environment with qualities conducive to suitability for the life, health and wellbeing of humans and ecosystems	· Minimise greenhouse gas emissions	Amicable resolution of complaints	N/A	<ul style="list-style-type: none"> No complaints on the complaints register 	Not Applicable
25	Traffic and Transport Management · Rural air environment with qualities conducive to suitability for the life, health and wellbeing of humans and ecosystems	· Minimise environmental nuisance due to dust for sensitive receptors resulting from Imperial's activities · Minimise greenhouse gas emissions	An absence of issues raised by the community as indicator for successful communication	Compliant	<ul style="list-style-type: none"> No complaints on the complaints register Ongoing consultation with community members has found no issues raised 	Not Applicable
26			No unresolved complaints	N/A	<ul style="list-style-type: none"> No complaints on the complaints register 	Not Applicable
27			The community is highly consulted with, and all comments provided are assessed and those viable implemented	Compliant	<ul style="list-style-type: none"> Ongoing consultation with community members has found no issues raised No complaints on the complaints register 	Not Applicable
28			High level of satisfaction by the community	Compliant	<ul style="list-style-type: none"> Ongoing consultation with community members has found a high level of satisfaction with Imperials operations No complaints on the complaints register 	Not Applicable
29			No vehicular accidents	Compliant	<ul style="list-style-type: none"> No vehicular accidents on the incident register 	Not Applicable

No	Environmental Values	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence	Environmental harm or Impact
30	Community Impact Minimisation · Livelihood and well-being of local communities and towns	<ul style="list-style-type: none"> · 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 partnerships with the local community, including using local contractors · No loss to the aesthetic or enjoyment factor for the community 	An absence of issues raised by the community as indicator for successful communication	Compliant	<ul style="list-style-type: none"> • No complaints on the complaints register • Ongoing consultation with community members has found a high level of satisfaction with Imperials operations 	Not Applicable
31			No unresolved complaints	N/A	<ul style="list-style-type: none"> • No complaints on the complaints register 	Not Applicable
32			The community is highly consulted with, and all comments provided are assessed and those viable implemented	Compliant	<ul style="list-style-type: none"> • The community is highly consulted with as per the ongoing Imperial stakeholder consultation log. • No complaints are on the complaints register • Ongoing consultation with community members has found a high level of satisfaction with Imperials operations 	Not Applicable
33			High level of satisfaction by the community	Compliant	<ul style="list-style-type: none"> • Ongoing consultation with community members has found a high level of satisfaction with Imperials operations 	Not Applicable
34			No vehicular accidents	Compliant	<ul style="list-style-type: none"> • No vehicular accidents on the incident register 	Not Applicable
35			No off-site release of contamination from road corridors	Compliant	<ul style="list-style-type: none"> • No incidences of off-site release of contamination from road corridors on the complaints or incident register 	Not Applicable

No	Environmental Values	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence	Environmental harm or Impact
36	<p>Cultural Heritage and Sacred Site Preservation</p> <ul style="list-style-type: none"> · Maintain cultural heritage values of the region, both Indigenous and non-Indigenous 	<ul style="list-style-type: none"> · Avoid disturbance of or damage to Aboriginal or cultural heritage artefacts or Sacred Sites · Minimise impacts upon 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 · Ensure that the health and safety of exploration workers and the community is not compromised through management of cultural and environmental awareness 	No incidences of disturbance of archaeological sites or sites of cultural significance	Compliant	<ul style="list-style-type: none"> • No incidences of disturbance of archaeological sites or sites of significance on the complaints or incident register 	Not Applicable

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

Table 4: Compliance with Reporting and Monitoring Requirements

No	Reference	Requirement	Performance Status	Evidence
1	Code cl A.3.5 EMP s10.4	Geospatial information depicting areas cleared is to be provided to the Minister.	N/A	No areas cleared under this EMP during the AEPR period
2	Code cl A.3.6 (b) EMP s7.1 & Appendix 06	Weed management plan developed as part of the EMP must provide for ongoing weed monitoring.	Compliant	Weed Management Plan of the approved EMP includes the required clause
3	Code cl A.3.7(a)vi EMP s7.2 - Appendix 10	The fire management plan developed as part of the EMP must provide for annual fire mapping to monitor changes to fire frequency in the relevant areas.	Compliant	Bushfire Management Plan of the approved EMP includes the required clause
4	Code cl A.3.9(c) Code cl A.3.9(e) EMP s7.3	The rehabilitation plan developed as part of the EMP requires progressive rehabilitation of significantly disturbed land which is required to commence no longer than 12 months following the cessation of activities on the land. It also requires regular maintenance and annual monitoring of rehabilitated areas.	Compliant	Rehabilitation Management Plan of the approved EMP includes the required clause

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

No	Reference	Requirement	Performance Status	Evidence
5	Code cl B.4.13.2(c)	As a minimum, the following must be recorded and reported for each stage (where a stage in this context means all fluids pumped at a particular depth interval): a) total volume of hydraulic fracturing fluid pumped, b) quality of water used (tested for analytes in section C.8 of this Code. Analyses do not need to be repeated if the same water source is used for multiple stages) and c) typical and maximum concentrations of chemicals or other substances used.	N/A	No Hydraulic Fracturing was undertaken under this EMP during the AEPR period.
6	Code cl B.4.13.2(k)iv EMP s3.10	Where venting is the only technically feasible option for managing produced gas, the technical considerations preventing the use of the recovered gas must be recorded and included in the operator's annual report.	N/A	No venting occurred under this EMP during the AEPR period.
7	Code cl B.4.14.2(c) EMP s3.6.1	All new barriers or new well operating envelopes must be verified and clearly documented and reported by submission of an updated well barrier integrity validation (WBIV) report to DITT.	N/A	No new barriers or new well operating envelopes were established under this EMP during the AEPR period.
8	Code cl B.4.15.2(j) EMP s3.6.3	Complete and accurate records of the entire decommissioning procedure must be kept, with these records submitted as part of the legislative reporting requirements for the decommissioning of petroleum wells.	N/A	Not in the decommissioning phase.

No	Reference	Requirement	Performance Status	Evidence
9	Code cl C.3(e) EMP s7.5 & Appendix 13 & 18	The components of the wastewater management framework, include Monitor, manage and report in accordance with the Wastewater Management Plan and Spill Management Plan.	Compliant	The Waste and Wastewater Management Plan and Spill Management Plan of the approved EMP includes the required clause.
10	Code cl C.6.1(d) EMP s7.5 & Appendix 13	Wastewater tracking documentation must be reported to the Minister at least annually in accordance with the framework (Spill Management Plan and Wastewater Management Plan) outlined in the EMP	Compliant	Wastewater Report for the EMP sent to DEPWS on the 18th May 2022.
11	Code cl C.7.1(d)ii EMP s3.9, 7.5 & Appendix 13	Wastewater Management Plan must include a program for monitoring and reporting against the effectiveness of the measures for the mitigation of interaction with wildlife, stock and human receptors with wastewater.	Compliant	The Waste and Wastewater Management Plan of the approved EMP includes the required clause.
12	Code cl D.5.9.2(c) EMP s3.10 & Appendix 17	Emissions from exploration, well construction (including during flowback) and workovers must be measured, and reports submitted. <i>Note: the interest holder must provide to DEPWS a report on actual versus predicted greenhouse gas emissions in the EMP, and cumulative emissions.</i>	Compliant	Emissions report submitted to DEPWS 24 August 2021. Emissions report for September 2021 – September 2022 submitted to DEPWS on the 30/9/2022.
13	Code cl D.5.9.3(a) EMP s3.10 & Appendix 17	Where natural gas is vented or flared at a gas processing or other downstream facility, emissions must be estimated and reported.	N/A	No gas processing facility or other downstream facility is part of the EMP during the AEPR period.

No	Reference	Requirement	Performance Status	Evidence
14	Reg 33 EMP s.5.1	DEPWS is notified of reportable incidents within 2 hours of the interest holder becoming aware of the incident, or within 2 hours of the incident occurring. A written report must be provided within 24 hours if the initial report was made orally.	N/A	No reportable incidents occurred as part of the EMP during the AEPR period.
15	Reg 34 EMP s5.1	Reports on reportable incidents are to be provided to DEPWS as soon as practicable and within 72 hours of the event occurring. A final report must be provided to DEPWS within 30 days after remediation/clean-up of the affected area.	N/A	No reportable incidents occurred as part of the EMP during the AEPR period.
16	Reg 35 EMP s8.2	A written report of all recordable incidents must be provided to DEPWS not later than 15 days after the 90-day reporting period (unless otherwise agreed).	Compliant	All recordable incident reports were provided to DEPWS no later than 15 days after the 90-day reporting period. Reports were submitted on the below dates. Q1 - 13 April 2021 Q2 - 14 July 2021 Q3 - 15 October 2021 Q4 - 11 January 2022 Q1 - 11 April 2022 Q2 - 8 July 2022
17	Reg 37A EMP Appendix 06	A report about flowback fluid from hydraulic fracturing must be provided to the Minister within 6 months of the flowback occurring.	N/A	No hydraulic fracturing was undertaken as part of the EMP during the AEPR period.

No	Reference	Requirement	Performance Status	Evidence
18	Reg 37B EMP Appendix 06	A report about produced water from hydraulic fracturing must be provided to the Minister within 6 months of the produced water being extracted.	N/A	No hydraulic fracturing was undertaken as part of the EMP during the AEPR period.
19	Schedule 1, item 12	Interest holder must notify the Minister, occupier of the land and owner of the land on which the activity is to be carried out before commencement of construction, ³ drilling, or seismic surveys.	N/A	No construction, drilling or seismic surveys were undertaken as part of the EMP during the AEPR period.

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

3. Overall Performance

3.1. Overview of performance

Table 5 provides a summary of the results of the compliance assessment against the 62 total compliance items.

Table 5: Performance Summary

Compliance Indicator	Number	Percentage
Compliant	31	50%
Partially Compliant	0	0%
Not Compliant	3	5%
Not Applicable	28	45%

3.2. Overview of non-compliant items

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

One non-compliance with a Ministerial condition was recorded during the reporting period.

3.2.1.1. Description

The inaugural Annual Environmental Performance Report for IMP2-6.1 was submitted to correspond with the original approval notice date (2 March 2020) of the now-superseded IMP2-4. This strategy, acknowledged in the initial report, was implemented to encompass the compliance data from March 2020 to September 2020. This approach ensured the inclusion of work conducted under IMP2-4 prior to the approval of IMP2-6.1, preventing what would have otherwise been a gap in coverage. Future reporting continued to be submitted on the March-March timeframe which doesn't align with IMP2-6.1 Approval Notice Condition 7: *The interest holder must provide an annual report to DEPWS on its environmental performance, in accordance with item 11(1)(b) in schedule 1 of the Petroleum (Environment) Regulations 2016 (NT). The first report must cover the 12-month period from the date of this approval (30 September 2020) and be provided within three calendar months of the end of the reporting period. The annual environmental performance report must align with the template prepared by DEPWS for this purpose and must include a signed declaration by the interest holder or operator.*

3.2.1.2. Analysis of potential environmental harm or impact

This administrative non-compliance did not have the potential to cause environmental harm or impact.

3.2.1.3. Corrective actions

Imperial has updated this Annual Environmental Performance Report to fill the gap between IMP2-4 and IMP2-6.1, effectively aligning the report's timeframe with the approval notice date for IMP2-6.1. Moving forward, the reporting period will cover the 12-month period from the 30 September (to align with the date of the approval notice) and be provided within three calendar months of the end of the reporting period. Imperial has scheduled the upcoming 2022-2023 AEPR for IMP2-6.1 to be submitted by the 30 December 2023 which aligns with Ministerial Condition 7.

3.2.2. Environmental Performance Standards

Two non-compliances with environmental performance standards were recorded during the reporting period.

3.2.2.1. Description

On 30 September 2021 two fauna deaths were noted on the Q3 Quarterly Recordable Report for IMP2-6.1:

- One avian fauna was found deceased in the drilling waste sump on 30 September 2021. The species was identified as the Crested Pigeon (*Ocyphaps Lophotes*) which is native to Australia and common throughout most of the mainland.
- A partial mammal (bat) was found deceased on the wellpad on 30 September 2021. The species was identified as the Red Flying Fox Bat (*Pteropus Scapulatus*) which is native to Australia and is common from Western Australia through Northern Australia and down the east coast to northern Victoria.

The fauna deaths are a non-compliance of environmental performance standard "No native fauna impacts (injury or fatality).

On 30 September 2021 a section of the sedimentation fence was noted as missing due to weathering on the Q3 Quarterly Recordable Report for IMP2-6.1. This is a non-compliance of environmental performance standard "No asset integrity failures".

3.2.2.2. Analysis of potential environmental harm or impact

The Crested Pigeon has a "secure" conservation status and is of "least concern" as a threatened status species. The Red Flying Fox Bat is of "least concern" as a threatened status species. Two fatalities of a common species is deemed to be negligible environmental impact.

No environmental impact was observed because of the missing sections of sedimentation fencing. Contractor inspections of the site confirmed that there was no resultant erosion due to the sedimentation fence missing.

3.2.2.3. Corrective actions

Imperial removed and disposed of the deceased fauna appropriately. Fauna impacts continue to be monitored on site.

Imperial repaired the erosion and sediment control devices. Erosion and sediment controls continue to be monitored on site.

3.3. Application of Lessons Learnt

The administrative non-compliance was related to regulatory reporting. Imperial acknowledges the opportunity to identify where improvements to internal processes are required to ensure future compliance. Upon review, it was determined that:

1. The superseding of IMP2-4 with IMP2-6.1 resulted in approval notice dates shifting from March 2020 to September 2020, and thus a loss of 6 months of compliance data if Ministerial Condition 7 was adhered to.
2. An activity schedule for Imperial's environmental compliance reporting dates was updated in May 2023 and the reporting period for AEPR IMP2-6.1 was entered as 30 December 2023, as per the approval notice. The 6-month gap in reporting dates was not immediately accounted for .

To ensure that all Ministerial approval conditions are achieved according to DEPWS requirements, it is recommended internally that in circumstances such as above, DEPWS is contacted to confirm the preferred action to take (whether an initial short report is provided prior to September or the first report encompasses an 18-month timeframe etc).

Imperial continues to monitor fauna impacts and asset integrity across the site, with these checks now absorbed across IMP3-4 and IMP4-3 EMP commitments.