Modification Notice - Regulation 22

Interest Holder	Imperial Oil and Gas Pty Ltd	EMP Title	2021-2025 EP187 Work	Unique EMP ID No.	IMP4-3	Mod No.	Date	27 September 2023
Brief Description	Imperial proposes to modify the regulated activity in IMP4-3 as it relates to gravel pit construction and operational maintenance. Prior to the wet season, civil works are required to prepare gravel pits to be in compliance with the commitments made in the approved EMP per Ministerial direction.						aintenance.	
							de in the approved EMP, as	
	Compliance with the commitments of the EMP include adherence to a risk control 'Gravel excavation areas are to be managed so that side slopes do not exceed 6%'. A review of all the associated EMP obligations for gravel pit construction has identified that this control will require additional land clearing / disturbance outside of the current gravel pit footprint that would be an environmental impact but is deemed unnecessary for current/continued use. Therefore, it is proposed that this control be amended to reflect the control listed in Section 2.51 of the EMP 'Gravel excavation areas are to be managed so that side slopes do not exceed 1:1.' This amendment does not change the residual risk rating of having an impact to inland water quality (assessed as low) as the gravel pits are constructed in a way to divert flow from entering the pit and pits are contoured to ensure drainage of the disturbed area is directed to shallow, low-sloped voids. In addition, this amendment still aligns with the Environmental Performance Standard of actively preventing erosion and sedimentation; Not allowing areas to continuously erode or create ongoing sedimentation.					managed so that side		
						excavation areas are to be		
						and sedimentation; Not		
	Details of the proposed amendment in the context of all gravel pit construction commitments in the EMP is detailed below.						below.	
Geospatial Files Included?	NA							



Does the proposed change result in a new, or increased, potential or actual environmental impact or risk?	If an INCREASE in an existing potential or actual environmental impact or risk is it provided for in the approved EMP?	Does the proposed change require additional mitigation measures to be included?	Has additional stakeholder engagement been conducted?	Does it require additional environmental performance standards and measurement criteria?	Does it affect compliance with Sacred Site Authority Certificates?	Does it affect current rehabilitation, weed, fire, wastewater, erosion and sediment control, spill or emergency response plans?	Will the environmental outcome continue to be achieved and will the impacts and risks be managed to ALARP and acceptable?
No. Changes aligns Risk Assessment with Appendix 02	No	No	No	No	No	No	Yes

Current EMP Text	Amended EMP Text
Appendix 2: Description of the Activity	Appendix 2: Description

Section 2.5 Gravel Pits

2.5.1 Overview:

Imperial will use on-site material for the majority of civil construction works. Gravel will be required to give a better running surface on some road sections and may be required to cap some wellpads, depending on the on-site material.

Imperial will have an ecologist on-site before clearing operations to undertake ground-truthing for ground-disturbing activities in advance of any ground disturbance, to ensure the actual riparian zones and the buffers for drainage depressions, and stream orders 1 to 4, and the location and density of hollow-bearing trees and their buffers, are identified, and regulated activities are avoided in sensitive areas. Where gravel is required, Imperial will establish local gravel pits; the establishment of these pits will include the following;

- Gravel pits will use the same site selection criteria as wellpads.
- Clearing of vegetation, to be stockpiled around the perimeter of the cleared area for rehabilitation.
- Stripping of topsoil (if required):

Appendix 2: Description of the Activity

Section 2.5 Gravel Pits

2.5.1 Overview:

No amendment to current EMP Text.

Current EMP Text	Amended EMP Text
O Topsoil will be stockpiled around the upslope side of the gravel pit to divert overland flow from entering the gravel pit. O If there is no topsoil on-site (e.g. Pea Gravel site), a diversion bund will be constructed upslope to divert any overland flow. A whoa boy will be constructed on the access track so that water does not flow down the access track into the gravel pit. Batters will not be steeper than 1:1, to allow safe passage for animals, and people. Gravel pits will intentionally be kept wide and shallow to facilitate rehabilitation. An indicative layout for a gravel pit is shown in: Section 20	Amerided EMP Text
Figure 2.20: Indicate Gravel Pit Layout	

Current EMP Text	Amended EMP Text		
Appendix 4: Risk Assessment	Appendix 4: Risk Assessment		
Risk #13: Control to prevent impact to surface hydrology.	Risk #13:		
 Contouring of gravel pits to ensure drainage of disturbed areas is directed to shallow, low-sloped voids (internal). 	No amendment to current EMP Text		
Risk #14: Control to prevent impact to hydrological systems. - Light contour ripping of reshaped gravel pit surfaces.	Risk #14: No amendment to current EMP Text		
 Perimeter bunds are to be located to divert external 'run-on' water from entering work area; and contain internal pit runoff during rainfall events. 			
 Final voids created by gravel extraction are to be designed and located so as to receive internal pit drainage. Areas external to voids to be maintained at slopes <2% as far as practical. 			
Risk #15: Controls to prevent increase in sediment load in water courses.	Risk #15:		
 Surface contouring of land will ensure free drainage. Perimeter bunds are to be located to divert external 'run-on' water from entering work area; and contain internal pit runoff during rainfall events. Gravel excavation areas are to be managed so that side slopes do not exceed 6%. Perimeter bunds are to be formed from topsoil overburden (min 0.5m height) and woody vegetation resulting from clearing. Where runoff from within gravel pits cannot be directed internally (i.e. to voids, contained by permitter bunds), Type 2 sediment controls (e.g. rock check dams wrapped in geotextile, mulch berms, sediment bags, coir logs) are required at outlet areas to treat runoff prior to discharge. Risk #18: Control to prevent disturbance of stakeholder use of the land Gravel stockpiles areas to be managed to keep stockpile area to a minimum. 	The listed control - 'Gravel excavation areas are to be managed so that side slopes do not exceed 6%' will be changed to reflect the control in Section 2.5.1 – 'Gravel excavation areas are to be managed so that side slopes do not exceed 1:1'.		
Risk #19: Minimize land cleared to reduce impact on surrounding users of the land	Appendix 12: Rehabilitation Management Plan		
Appendix 12: Rehabilitation Management Plan	Section 12.2 Final land use		

Current EMP Text	Amended EMP Text			
Section 12.5.1 During operations:	12.5.1 During operations:			
 Maintenance of gravel pits, when required and still in used by: Contouring of gravel pits to ensure drainage of disturbed area is directed to shallow, low-sloped voids (internal) Consolidation of stockpiled subsoil material (to occupy minimal area). Light contour ripping of reshaped surface. Retention of perimeter bunds (topsoil). 	No amendment to current EMP Text.			
Section 7.7 Environmental Outcomes, Performance Standards and Measurement Criteria Table 32	Section 7.7 Environmental Outcomes, Performance Standards and Measurement Criteria			
Activity: Civil construction and operation of infrastructure	Table 32			
Environmental Performance Standard: Actively preventing erosion and sedimentation; Not allowing areas to continuously erode or create ongoing sedimentation.	Activity: Civil construction and operation of infrastructure. No amendment to current EMP Text.			
Measurement criteria: As-built ESC drawings show that ESCP implemented; Weekly reports to show ESC operations and maintained correctly.				