

Approval notice and statement of reasons

Petroleum (Environment) Regulations (NT) (Regulations)

Interest holder	Central Petroleum (NT) Pty Ltd
Petroleum interest/s	OL3
Environment management plan (EMP) title	Environmental Management Plan for the PV-13 Connection and PV-02 Reinjection System Upgrade
EMP document reference	PVL-650-PLN-0002 Rev 2
EMP assessment document reference	E2019/0001~0015
Regulated activity	Construction of an above ground flowline to connect the existing PV-13 well to the existing production facilities, upgrade of the PV-02 reinjection system and associated works as specified in the EMP.
Was the regulated activity referred ¹ for consideration whether an environmental impact assessment or public environmental report was required?	No Palm Valley Gas Field is an existing and ongoing operation with no new disturbances proposed under the EMP. Refer to Section 5.
Was an environmental impact assessment or public environmental report required?	No - Refer above.
Date EMP was first submitted under reg 6	23/11/2018
Date further information was submitted under reg 10, if applicable	18/01/2019 29/01/2019
Date of resubmission notice under reg 11(2)(b), if applicable	N/A
Date EMP was resubmitted under reg 11(3), if applicable	N/A
Date of decision	1 / March / 2019
Decision maker	 Signature

Eva Lawler,
Minister for Environment and Natural
Resources

1 Approval notice

1. The EMP is approved. reg 11(a)
2. The approval is subject to the following conditions. reg 12(2)
 - a. Activities proposed under the EMP are not to commence until the Department of Primary Industry and Resources has confirmed an approved Environmental Security Bond is held by the Department.

¹ This means a referral under the *Environmental Assessment Act (NT)* or the *Environment Protection and Biodiversity Conservation Act 1994 (Cth)*.

1 Approval notice

- b. This approval is valid for 12 months.

2 Statement of reasons

1. The EMP meets the approval criterion in reg 9(1)(a), because it contains all the information required by Schedule 1 of the Regulations. reg 9(1)(a)
2. The EMP meets the approval criterion in reg 9(1)(b) for the following reasons: reg 9(1)(b)
 - a. The nature of the regulated activity is as follows:
 - i. Construction of an above ground flowline to connect the existing PV-13 well to the existing production facilities;
 - ii. upgrade of the PV-02 reinjection system; and
 - iii. Works associated with the above activities as specified in the EMP.
 - b. The scale of the regulated activity is as follows:
 - i. The scale of the activity is considered low as this EMP is for very limited activities being PV-13 connection and PV-02 reinjection system upgrade within the existing Palm Valley Gas Field and requires no additional clearing. Activities are confined to the existing disturbance footprint and limited to the very limited works as described in the EMP. Construction activities are expected to be completed within six months.
 - c. The EMP contains an appropriate level of detail for the nature and scale of the activities proposed being the PV-13 connection and PV-02 reinjection system upgrade. The identification of the activity, environment, environmental risks, and environmental impacts is comprehensive and contains a sufficient level of detail. The assessment of risks, environmental outcomes and performance standards, implementation strategy, personnel, emergency contingency plan, stakeholder engagement, legislative requirements, recording, monitoring, reporting and notifications is detailed to an appropriate level of quality and applicability.
 - d. Having regard to the above, the information in the EMP is appropriate for the nature and scale of the regulated activity to which it relates.
3. The EMP meets the approval criterion in reg 9(1)(c) for the following reasons: reg 9(2)(a)
 - a. I have considered reg 4(d) (which requires that I give fundamental consideration to the conservation of biological diversity and ecological integrity) as follows:
 - i. I believe the information I have regarding the existing biodiversity and ecosystems that are to be affected by the regulated activity; the effects that are likely; and the mitigative measures reasonably available, is sufficient.
 - ii. The regulated activity poses a low risk to the ecosystem in the OL3 area. The regulated activity does not include any additional clearing as the activities are within the existing Palm Valley Gas Field disturbance area. All other risks to flora, fauna and ecosystems has been addressed and mitigated to an appropriate standard. I consider that the mitigation measures identified in the EMP will effectively manage the environmental risks of the regulated activity.
 - iii. The conservation of biological diversity and ecological integrity is vital to the achievement of ecologically sustainable development. Given the fundamental nature of this consideration, I have given central importance to the conservation of biodiversity and ecological integrity in weighing whether I am satisfied the approval criterion in reg 9(1)(c) has been met.

- iv. If carried out in accordance with the EMP, the risks of the regulated activity to the conservation of biological diversity is considered to be low.
 - v. If carried out in accordance with the EMP, the risks of the regulated activity to the conservation of ecological integrity is considered to be low.
- b. I have considered reg 4(a) (which concerns the integration of long-term and short-term economic, environmental, social and equitable considerations) as follows:
- i. The expression *environment* as defined in the Regulations relevantly includes the well-being of humans, structures made or modified by humans, amenity values of an area and economic, social and cultural conditions. The requirements under the Regulations include stakeholder engagement and a broad consideration of the environmental impacts and environmental risks of the regulated activity in question. In making that broad consideration, the long-term and short-term environmental impacts and environmental risks were identified and assessed in the EMP. In this way, the concept of integration has been implemented.
 - ii. In carrying out the regulated activity there is no particular contest between economic, social and environmental considerations that requires further mention.
 - iii. Accordingly, I am satisfied that the concept of integration has been taken into account.
- c. I have considered reg 4(b) (which concerns the 'precautionary principle') as follows:
- i. The regulated activity does not pose a threat of serious or irreversible environmental damage which warrants the application of the precautionary principle.
- d. I have considered reg 4(c) (which concerns the principle of intergenerational equity) as follows:
- i. The environmental burdens of the regulated activity will not disproportionately affect particular [future or present] stakeholders. Accordingly I do not believe that the carrying out of the regulated activity in accordance with the EMP would have an effect contrary to the principle of intergenerational equity.
- e. I have considered reg 4(e) (which concerns the promotion of improved valuation, pricing and incentive mechanisms) as follows:
- i. In accordance with the 'polluter pays principle':
 - (1) The interest holder will cover the cost of remediation of the impacts of the regulated activity, as is set out in section 11 of the EMP
 - (2) If the interest holder fails to remediate the impacts, a security will be held by the Minister which will be adequate to cover the resulting costs.
 - ii. Through the above, the interest holder will be incentivised to complete rehabilitation work to recover their security.
- f. No environmental report or statement has been required to be prepared in relation to the regulated activity under the Environmental Assessment Act. Section 5.1 of the EMP outlines the operations against the Northern Territory Environment Protection Authority's standards and objectives for referral under reg 9(2)(b)

the NOI process. It was determined that the regulated activity does not have the potential to have a significant effect on the environment. As such referral was not required.

- g. The existing environment along with its particular values and sensitivities is appropriately identified in section 7 of the EMP. reg 9(1)(c)
- h. The anticipated environmental risks are appropriately identified in section 8 of the EMP.
- i. I agree with the risk assessment set out in section 8 of the EMP.
- j. The anticipated environmental impacts are appropriately identified in section 8 of the EMP. I agree this is a reasonable identification of the environmental impacts of the regulated activity.
- k. There are no environmental impacts or environmental risks relating to the proposed regulated activity which I consider to be unacceptable.
- l. Overall, having regard to the above, I am satisfied that the EMP demonstrates that the regulated activity is to be carried out in manner by which the environmental impacts and environmental risks are reduced to a level that is:
 - i. as low as reasonably practicable; and
 - ii. acceptable.