

Annual Environmental Performance Report

EP187 2D Seismic Work Program

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Permit	EP 187
Interest holder details	Imperial Oil and Gas Pty Ltd Level 19, 20 Bond Street Sydney NSW 2000 Australia ABN: 92 002 699 578
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Approved by	Imperial Oil and Gas

Version	Date	Author	Changes Made
1.0	22/11/2021	Charles Dack	Report written
1.1	01/12/2021	Jon Bennet	Small modifications made

Signature and Certification	
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Date	03/12/2021

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Acronyms/Abbreviations

Acronyms/Abbreviations	Description
AEPR	Annual Environment Performance Report
EMP	EP187 2D Seismic Environment Management Plan (Document Number EP187-EMP-XPN-REP-007)
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
COVID-19	novel corona virus disease
QRIR	Quarterly Recordable Incident Report

Introduction

The Petroleum (Environment) Regulations 2016 (NT) include a requirement for the interest holder to provide a report to the Minister on an annual basis that outlines the environmental performance of the interest holder (the Annual Environmental 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 the information required to be recorded, monitored or reported under the Petroleum (Environment) Regulations 2016 (NT) and any other law in force in the Northern Territory related to the conduct of the regulated activity.

This Annual Environmental Performance Report (AEPR) applies to the EP187 2D Seismic Work Program approved on 26 September 2019. The period covered by this AEPR is from 26 September 2020 to 25 September 2021.

IMPERIAL TIMELINE OF OPERATIONS

Table 1 - Imperial Timeline of Operations

Item	Date Span	2020				2021								
		September	October	November	December	January	February	March	April	May	June	July	August	September
Rehabilitation Progress Assessment	1/4/2021-15/4/2021													

Timeline of events:

- Rehabilitation Progress Assessment



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 EMP was approved on 26 September 2019.

The first Annual Environmental Performance Report (AEPR) covering the period of 26 September 2019 to 25 September 2020 is published on the Department of Environment Parks and Water Security's website.

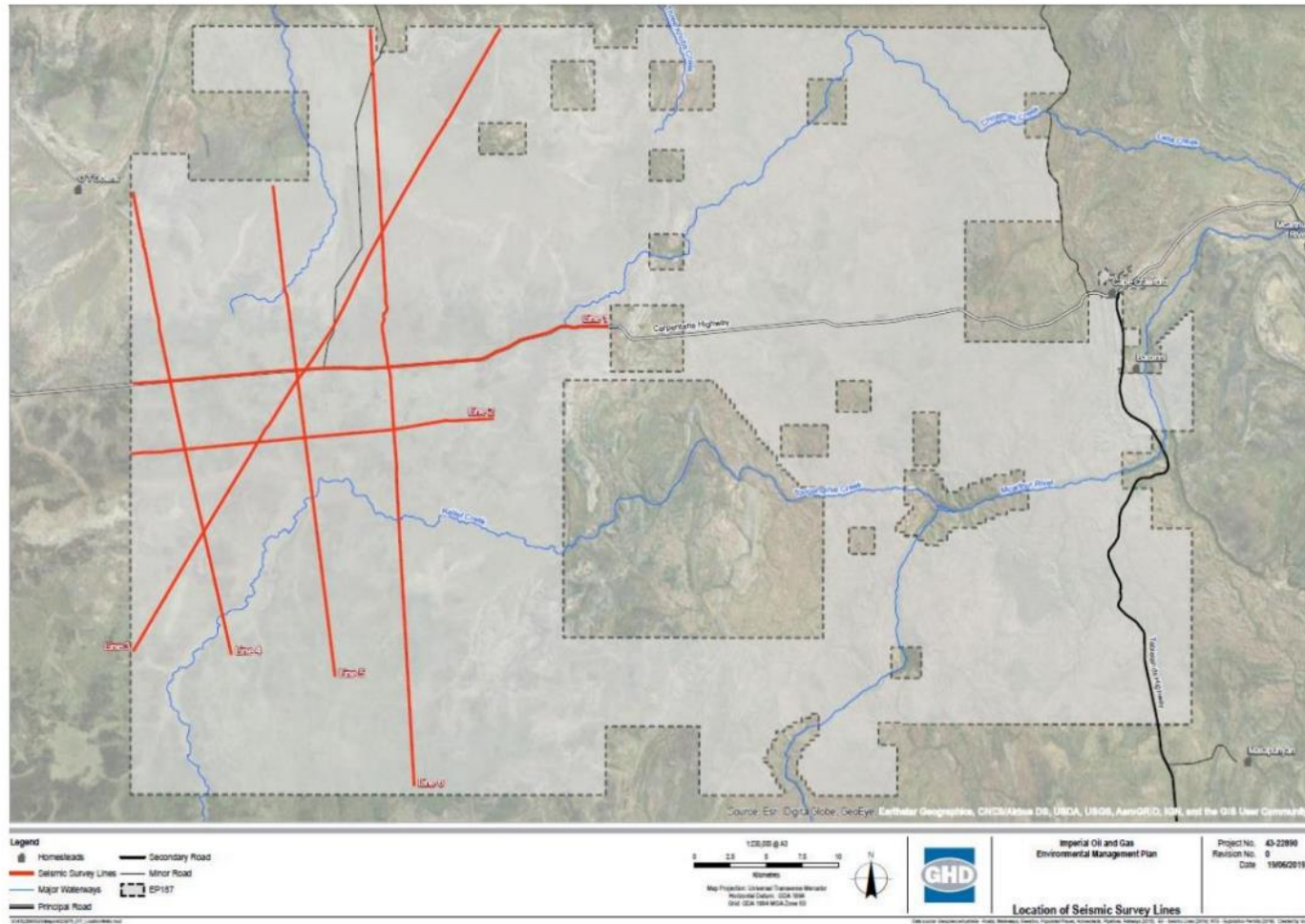


Figure 1 -Location of Regulated Activities as approved under the EMP

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 approved EMP.
2. Compliance with each environmental outcome and environmental performance standard within the 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 the requirement for the entire 12 month reporting period
Partially Compliant	Compliant with the time-bound requirement for the majority of the reporting period
Not Compliant	The interest holder did not comply with the requirement during the reporting period
N/A	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. Inspections and monitoring as per section 8.9.1 of EMP2-04 and 7.5.8 of EMP2-6.1.
 - c. Groundwater Monitoring as per as per section 8.9 of EMP2-6.1 and EMP2-04.
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 Imperial's compliance with the ministerial conditions set out in the EMP approval notice.

2.1 Compliance with Ministerial EMP Approval Conditions

Table 3 - Compliance with Ministerial EMP2-04 Approval Conditions – in place from 2/3/2020 – 30/09/2020

Row	Condition	Compliance Status	Evidence	
1	Condition 1: 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	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.	N/A	No regulated activity commenced during the AEPR period.	
3	Condition 3: Condition 3: The Interest Holder must provide to DEPWS within 3 months of completion of the regulated activity:	N/A	Not applicable to AEPR Period	
4				I. High resolution aerial imagery of the disturbance area
5				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
6	III. A spatial assessment report on the disturbance footprint for the approved regulated activity	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		
7	Condition 4: Condition 4: The Interested Holder must provide to DEPWS, an updated rehabilitation plan within 3 months of completion of the regulated activity that includes:	Compliant	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 rehabilitation is incorporated in the EMP in section 4.3.8 proposed timetable	
	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.			
	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.	N/A	Not applicable this was finalised in the earlier AEPR Period	

2.2 Compliance with Environmental Outcomes and Environmental Performance Standards

Table 4 provides a systematic overview of Imperials compliance with the environmental outcomes and environmental performance standards within the approved EMPs. (Taken from Table 16 as per NT EPA recommendations and cross-checked against appendix 1 performance objectives)

All non-compliances and partial compliances of environmental outcomes and performance standards have been reported in full to DEPWS through the Quarterly Recordable Incident Reports. These are available for viewing on the DEPWS Recordable incident reports webpage.

Table 4 - Compliance with Environmental Outcomes and Environmental Performance Standards

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence	Environmental harm or Impact
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 the regulated activity have been received 	Not Applicable
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	N/A	<ul style="list-style-type: none"> No regulated activities were undertaken during the AEPR period 	Not Applicable
3		Meet all government air quality standards for emissions	N/A	<ul style="list-style-type: none"> No regulated activities were undertaken during the AEPR period 	Not Applicable
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 relating to the regulated activity have been received 	Not Applicable
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 Maintain the ecological function, abundance, species diversity and geographical distribution of flora and fauna (subterranean, terrestrial and freshwater) Maintain, and where possible enhance, the local, regional and national conservation values of the area 	Minimise the risk of disease amplification or distribution within the natural environment	N/A	<ul style="list-style-type: none"> No regulated activities were undertaken during the AEPR period 	Not Applicable
6		Management of existing weed base load and control potential introduction and spread of new weeds	Compliant	<ul style="list-style-type: none"> See Exploration Operations Rehabilitation Report, Fox & Co Report No: IG-06 	Not Applicable
7		Monitoring work area to minimise impacts to fauna habitat and sensitive vegetation	Compliant	<ul style="list-style-type: none"> See Exploration Operations Rehabilitation Report, Fox & Co Report No: IG-06 	Not Applicable
8		No native fauna impacts (injury or fatality)	Compliant	<ul style="list-style-type: none"> No recordable incidents on the register or reported in the quarterly recordable incident reports 	Not Applicable
9		No loss of sensitive and/or riparian vegetation	Compliant	<ul style="list-style-type: none"> See Exploration Operations Rehabilitation Report, Fox & Co Report No: IG-06 	Not Applicable
10		No long-term loss of habitat due to seismic activities	Compliant	<ul style="list-style-type: none"> See Exploration Operations Rehabilitation Report, Fox & Co Report No: IG-06 	Not Applicable

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence	Environmental harm or Impact
11	Cultural (Maintain cultural heritage of the region, both indigenous and nonindigenous) • 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 damage to Aboriginal or cultural heritage artefacts or Sacred Sites	Cultural and heritage integrity and diversity of the area is maintained	Compliant	• No recordable incidents on the register or reported in the quarterly recordable incident reports	Not Applicable
12		No incidences of disturbance of archaeological sites or sites of cultural significance	Compliant	• No recordable incidents on the register or reported in the quarterly recordable incident reports	Not Applicable
13		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	• No recordable incidents on the register or reported in the quarterly recordable incident reports	Not Applicable
14		No unauthorised disturbance to identified cultural and heritage sites and/or objects of significance	Compliant	• No recordable incidents on the register or reported in the quarterly recordable incident reports	Not Applicable
15	Land (Suitability and stability of land for existing uses) • Maintain existing quality of soil profile • Minimise land disturbance Protect the productivity of the land for its intended land use	Any ground disturbance activity will be undertaken in accordance with the ESP and LCP.	N/A	• No regulated activity undertaken	Not Applicable
16		Ensure that vegetation clearing for seismic line preparation does not result in land degradation	Compliant	• See Exploration Operations Rehabilitation Report, Fox & Co Report No: IG-06	Not Applicable
17		Ensure that rehabilitation is compatible with existing land use and meets the expected standards of the community	Compliant	• See Exploration Operations Rehabilitation Report, Fox & Co Report No: IG-06	Not Applicable
18		Areas left safe, stable and non-polluting	Compliant	• See Exploration Operations Rehabilitation Report, Fox & Co Report No: IG-06	Not Applicable
19	Surface and Groundwater (Stability of land to preserve existing water quality, landscapes and ecosystems) • Protection of waterways Protect the quantity and quality of surface and groundwater	Maintain, and where possible enhance, the beneficial use of surface water and groundwater and maintain quality to ensure ecosystem maintenance	Compliant	• See Exploration Operations Rehabilitation Report, Fox & Co Report No: IG-06	Not Applicable
20		No degradation to surface water quality or drainage	Compliant	• See Exploration Operations Rehabilitation Report, Fox & Co Report No: IG-06	Not Applicable
21		No detrimental impact to ground water dependent ecosystems	Compliant	• See Exploration Operations Rehabilitation Report, Fox & Co Report No: IG-06	Not Applicable
22		No new erosion flow paths originated from seismic activities	Compliant	• See Exploration Operations Rehabilitation Report, Fox & Co Report No: IG-06	Not Applicable

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence	Environmental harm or Impact
23	Oil Spill (Protection of ecosystems and human health values from uncontrolled oil releases)	No uncontrolled releases of oils	Compliant	<ul style="list-style-type: none"> No recordable incidents on the register or reported in the quarterly recordable incident reports 	Not Applicable
24	<ul style="list-style-type: none"> Minimise impacts to ecosystems, land productivity and human health values Minimise impacts on soil, surface water and groundwater 	No incorrect storage and use of oils	Compliant	<ul style="list-style-type: none"> No recordable incidents on the register or reported in the quarterly recordable incident reports 	Not Applicable
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 	Maintain noise and vibration levels within statutory guidelines for rural areas	N/A	<ul style="list-style-type: none"> No regulated activities were undertaken during the AEPR period 	Not Applicable
26		Ensure that an adequate level of service, safety and public amenity is maintained	Compliant	<ul style="list-style-type: none"> No recordable incidents on the register or reported in the quarterly recordable incident reports 	Not Applicable
27		Manage seismic operations only to daylight.	N/A	<ul style="list-style-type: none"> No regulated activities were undertaken during the AEPR period 	Not Applicable
28		The community is highly consulted with, and all comments provided are assessed and those viable implemented	Compliant	<ul style="list-style-type: none"> Community consultation undertaken as required, comments assessed, and those viable implemented 	Not Applicable
29		Identify opportunities to deliver benefits to the local community throughout all phases of the Project	Compliant	<ul style="list-style-type: none"> Community consultation was undertaken throughout the project. Benefits delivered include leaving open 2D seismic acquisition lines for the community. 	Not Applicable
30	Identify, and to the greatest extent practicable minimise, any potential adverse effects on the community	Compliant	<ul style="list-style-type: none"> Community consultation was undertaken throughout the project to ensure that the adverse effects on the community are as minimal as possible. 	Not Applicable	
31	<ul style="list-style-type: none"> Maintain the recreational values of the area Protect the economic values of the area 	No off-site release of contamination from seismic activities	N/A	<ul style="list-style-type: none"> No regulated activities were undertaken during the AEPR period 	Not Applicable
32		An absence of issues raised by the community as indicator for successful communication	Compliant	<ul style="list-style-type: none"> No recordable incidents on the register or reported in the quarterly recordable incident reports 	Not Applicable
33		No unresolved complaints	Compliant	<ul style="list-style-type: none"> No recordable incidents on the register or reported in the quarterly recordable incident reports 	Not Applicable

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence	Environmental harm or Impact
34		High level of satisfaction by the community	Compliant	<ul style="list-style-type: none"> Community consultation was undertaken throughout the project. No negative feedback was received about the project. 	Not Applicable
35		Maintain the integrity, stability and environmental values of the creek, riverbanks, and watercourses	Compliant	<ul style="list-style-type: none"> See Exploration Operations Rehabilitation Report, Fox & Co Report No: IG-06 	Not Applicable
36	Waterways (Stability of land to preserve existing water quality, landscapes and ecosystems) <ul style="list-style-type: none"> Protection of waterways Protect the quantity and quality of surface water 	Protect existing water processes including sediment movement	Compliant	<ul style="list-style-type: none"> See Exploration Operations Rehabilitation Report, Fox & Co Report No: IG-06 	Not Applicable
37		No loss of sensitive vegetation (e.g., riparian) resulting from seismic activities	Compliant	<ul style="list-style-type: none"> See Exploration Operations Rehabilitation Report, Fox & Co Report No: IG-06 	Not Applicable
38		No interaction of wildlife, stock or human receptors with stored waste.	N/A	<ul style="list-style-type: none"> No stored wastes on the regulated area during the AEPR period 	Not Applicable
39	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 	No rubbish is left in the area after completion of seismic operations.	N/A	<ul style="list-style-type: none"> No stored wastes on the regulated area during the AEPR period 	Not Applicable
40		All waste is transported and disposed of offsite in accordance with The Code	N/A	<ul style="list-style-type: none"> No stored wastes on the regulated area during the AEPR period 	Not Applicable
41		All rubbish generated in the field is segregated in accordance with Schedule 2 of the Waste Management and Pollution Control (Administration) Regulations 1998 for disposal at the nearest approved refuse station.	N/A	<ul style="list-style-type: none"> No stored wastes on the regulated area during the AEPR period 	Not Applicable
42		No oil contamination to the environment	Compliant	<ul style="list-style-type: none"> No recordable incidents on the register or reported in the quarterly recordable incident reports 	Not Applicable
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 	Design the Programme to minimise any detriment to the visual amenity of the area	N/A	<ul style="list-style-type: none"> Programme design and implementation was undertaken in previous AEPR period 	Not Applicable
44		Acknowledge the introduction of a non-rural element into the landscape and seek to minimise the effect	N/A	<ul style="list-style-type: none"> The introduction of noise, vibration and clearing activities have all been outlined in the EMP and the implementation undertaken in the previous AEPR period 	Not Applicable

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence	Environmental harm or Impact
45		Manage potential overspill from light sources and comply with appropriate standards	N/A	<ul style="list-style-type: none"> No regulated activities were undertaken during the AEPR period 	Not Applicable
46		High level of satisfaction by the community	Compliant	<ul style="list-style-type: none"> Community consultation was undertaken throughout the project. No negative feedback was received about the project. 	Not Applicable
47		An absence of issues raised by the community as indicator for successful communication	Compliant	<ul style="list-style-type: none"> Community consultation was undertaken throughout the project. No negative feedback was received about the project. 	Not Applicable
48		No unresolved complaints	Compliant	<ul style="list-style-type: none"> Community consultation was undertaken throughout the project. No negative feedback was received about the project. 	Not Applicable
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 Minimise impacts upon environmental values of the local community 	Ensure that roads are maintained, and road traffic managed to meet the required level of service	N/A	<ul style="list-style-type: none"> No impacts to roads as a result of no regulated activity undertaken during the AEPR period 	Not Applicable
50		Implement appropriate measures to mitigate adverse traffic effects.	N/A	<ul style="list-style-type: none"> No regulated activity undertaken during the AEPR period 	Not Applicable
51		An absence of issues raised by the community as indicator for successful communication	Compliant	<ul style="list-style-type: none"> Community consultation was undertaken throughout the project. No negative feedback was received about the project. 	Not Applicable
52		No unresolved complaints	Compliant	<ul style="list-style-type: none"> No negative feedback was received about the project. 	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"> Community consultation was undertaken throughout the project. No negative feedback was received about the project. 	Not Applicable
54		High level of satisfaction by the community	Compliant	<ul style="list-style-type: none"> Community consultation was undertaken throughout the project. No negative feedback was received about the project. 	Not Applicable
55		No vehicular accidents	N/A	<ul style="list-style-type: none"> No regulated activity undertaken 	Not Applicable

Row	Environmental Outcome	Environmental Performance Standards	Compliance Status	Evidence	Environmental harm or Impact
56	Health, Safety and Risk (Livelihood and wellbeing of local communities and towns) Minimise safety risks to the public and other third parties	Undertake an open and transparent risk assessment process and ensure that all risks are managed in an acceptable manner	N/A	<ul style="list-style-type: none"> The risk assessment process was approved in the EMP, and the implementation undertaken in the previous AEPR period 	Not Applicable
57		Ensure that risk is managed to meet current government standards.	N/A	<ul style="list-style-type: none"> The risk management during the regulated activity was implemented in the previous AEPR period 	Not Applicable
58		An absence of issues raised by the community as indicator for successful communication	Compliant	<ul style="list-style-type: none"> Community consultation was undertaken throughout the project. No negative feedback was received about the project. 	Not Applicable
59		No unresolved complaints	Compliant	<ul style="list-style-type: none"> Community consultation was undertaken throughout the project. No negative feedback was received about the project. 	Not Applicable
60		The community is highly consulted with, and all comments provided are assessed and those viable implemented	Compliant	<ul style="list-style-type: none"> Community consultation was undertaken throughout the project. No negative feedback was received about the project. 	Not Applicable
61		High level of satisfaction by the community	Compliant	<ul style="list-style-type: none"> Community consultation was undertaken throughout the project. No negative feedback was received about the project. 	Not Applicable
62		No vehicular accidents	Compliant	<ul style="list-style-type: none"> No recordable incidents on the register or reported in the quarterly recordable incident reports 	Not Applicable

2.3 Compliance with Mandatory Reporting Requirements

Table 5 demonstrates Imperial's compliance with reporting requirements in The Code of Practice: Onshore Petroleum Activities in the Northern Territory (The Code) and Imperial'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)¹ 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	N/A	Compliance attained in the previous AEPR reporting period.
2	The Code cl A.3.6 (b)	Weed management plan developed as part of the EMP must provide for ongoing weed monitoring.	N/A	Compliance met in the previous AEPR reporting period.
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.	Compliant	The fire management plan includes annual fire mapping.
4	The Code cl A.3.9(c) The Code cl A.3.9(e)	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.	N/A	Compliance met in the previous AEPR reporting period.
5	The 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 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	N/A	Not a requirement of this Regulated Activity
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	Not a requirement of this Regulated Activity
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 an updated well barrier integrity validation (WBIV) report to DITT	N/A	Not a requirement of this Regulated Activity
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	Not a requirement of this Regulated Activity
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	Imperial followed the following guidelines and <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 Dept. of Health Environmental Health Guidelines for Private Water supplies January 2012 • Environmental Assessment Guidelines – Development proposals submitted under the Planning Act.

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

No	Reference	Requirement	Compliance Status	Evidence
				<ul style="list-style-type: none"> • APPEA Environmental Incident Database Guidelines, November 2001 • 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	Not a requirement of this Regulated Activity
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	Not a requirement of this Regulated Activity
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	Not a requirement of this Regulated Activity
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	Not a requirement of this Regulated Activity
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	Not a requirement of this Regulated Activity
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	Not a requirement of this Regulated Activity
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	Emissions report submitted to DEPWS on 24/09/2021
17	The Code cl D.6.2(a)	Reports of baseline assessments must be submitted at the conclusion of each field campaign.	N/A	Not a requirement of this Regulated Activity 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	Not a requirement of this Regulated Activity
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	Regulation 14 submitted. This AEPR is being used as evidence to show compliance with the EMP.
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	Imperial and continues to meet with stakeholders.

No	Reference	Requirement	Compliance Status	Evidence
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	No reportable incidents occurred
22	Reg 34	Reports on reportable incidents are to be provided to DEPWS as soon as practicable and within 3 days 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
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).	Compliant	All quarterly recordable incident reports were submitted on the following dates. <ul style="list-style-type: none"> • Q2 - 13/01/2021 • Q3 - 13/04/2021 • Q4 - 14/07/2021 • Q5 - 15/10/2021
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	Not a requirement of this Regulated Activity
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	Not a requirement of this Regulated Activity
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	N/A	No Regulated Activity undertaken during the AEPR period
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 the original bearing and reference points will be maintained.	Compliant	See Exploration Operations Rehabilitation Report, Fox & Co Report No: IG-06
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.	Partially Compliant	See Exploration Operations Rehabilitation Report, Fox & Co Report No: IG-06. A report undertaken by a suitably qualified person, submitted post two weeks audit. No environmental harm or incident occurred as a result of this partially compliant status.
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 sent as per previous AEPR. See Exploration Operations Rehabilitation Report, Fox & Co Report No: IG-06 for a summary.
30	EMP Table 15. Environmental Management Risk Assessment	Release of chemical/hazardous materials will be reported to the DEPWS as required	N/A	No spills or recordable incidents on the register or reported in the quarterly recordable incident reports for this AEPR period

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	N/A	No ignition or recordable incidents on the register or reported in the quarterly recordable incident reports for this AEPR period
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.	N/A	No Regulated Activity undertaken during the AEPR period
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 - 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	N/A	No requirement to report under Part II, Division 3 of the schedule was required for this AEPR period

3. Summary of Compliance

3.1. Overview of Compliance

Table 6 provides a summary of the results of the compliance assessment against the 73 total compliance items.

Table 6 - Overview of Compliance

Indicator	Number	Percentage	Percentage Applicable
Compliant	54	52.43%	98.18%
Partially Compliant	1	0.97%	1.81%
Not Compliant	0	0%	0%
Not Applicable	48	46.60%	N/A

Total of 103, 55 applicable.

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.

Regulatory Reporting

Table 5 demonstrates Imperial's compliance with reporting requirements in the EMP, the Code of Practice: Onshore Petroleum Activities in the Northern Territory (The Code) and Imperial's compliance with reporting requirements under the Petroleum (Environment) Regulations 2016 (NT) schedule 1, item 11(2)

Description

EMP Section 7.5.1.17. Rehabilitation Plan required that a rehabilitation audit by the independent suitably qualified person (SQP) following rehabilitation works and that the report be provided to DEPWS within two weeks of the audit.

The audit was undertaken by the SQP, but the report was not submitted within the 2-week time frame.

Analysis of Potential Environmental Harm or Impact

No potential environmental harm or impact occurred because of the report being submitted outside of this timeframe.

Corrective Actions

Future EMPs will remove the requirement for mandatory rehabilitation report timeline submission. This timeline adds no beneficial outcome for the Department or for Imperial and will allow for the appropriate drafting for rehabilitation reports to occur.

3.3. Application of Lessons Learned Across Imperial Onshore Interests

Lessons learnt and applicable across Imperial operations include the following:

- Removal of unnecessary deadlines within EMPs; deadlines only add more unnecessary paperwork and reporting requirements with no beneficial environmental or operational output.
- Environmental security paid to the Department was ten times greater than the cost of rehabilitation. Environmental security deposits should more accurately reflect the actual cost of rehabilitation management.