

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.	7	Date	06/06/2024
Brief Description	<p>Imperial proposes to modify the regulated activity in IMP4-3 as it relates to wastewater storage tanks and their associated bunded pads/ lining. There are numerous references to wastewater storage and the containment of contaminants in the approved EMP IMP 4-3.</p> <p>Imperial proposes to amend these references to align with the modification that the <u>“Bunded tank pad will accommodate 110% of the volume of the largest tank, unless the container is equipped with individual secondary containment as per the Code of Practice: Onshore Petroleum Activities. If the container is equipped with individual secondary containment, a 1m earthen bund will surround any in-ground treatment tanks and / or double lined above ground tanks.”</u></p> <p>The proposed modification is consistent with the requirements of the Code of Practice: Onshore Petroleum Activities (the Code), the Petroleum (Environment) Regulations 2016 and the IMP4-3 Appendix 06.01 – Hydraulic Fracturing (HF) Chemical Risk Assessment. This is demonstrated in Section A and B of this submission.</p> <p>The proposed modification does not inadvertently change the risk profile which remains at a residual risk level of 1 (see Section C on page 11 for risk profile). Assessment of the risks from a scenario where fluids were to overflow an earthen bund are addressed in Appendix 0.01 HF Chemical Risk Assessment of the approved IMP 4-3 and remain applicable with the proposed modification.</p> <p>ALARP is maintained through meeting requirements of the Code and implementing all reasonably practicable site-specific controls as outlined in Section D of this submission.</p> <p>Environmental outcomes as stated in the EMP remain achievable when implementing the proposed modification as per Section E on page 13 and aligns with existing IMP4-3 environmental performance standards and measurement criteria (see Section F of this submission).</p> <p>The proposed modification has implications for the Spill Management Plan which requires amendment to incorporate the proposed modification. Details of the proposed amendments referring to wastewater storage tank commitments in the EMP are detailed below.</p>								
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. See Section C below.	-	No	No	No. See Section F below.	No	Yes. Spill Management Plan.	Yes. See Section D below.
Current EMP Text				Amended EMP Text			
<p>IMP 4-3 Section b. Description of Activities</p> <p>The establishment of bunded tanks pads and tanks fitted with leak detection at the above wellpads.</p>				<p>IMP 4-3 Section b. Description of Activities</p> <p>The establishment of bunded tank pads with accommodation of 110% the volume of the largest tank, unless the container is equipped with individual secondary containment as per the Code of Practice: Onshore Petroleum Activities. If the container is equipped with individual secondary containment, a 1m earthen bund will surround any in-ground treatment tanks and / or double lined above ground tanks. Tanks will be fitted with leak detection.</p>			
<p>IMP 4-3 Section 3. Description of regulated activity 3.1 Overview of the activities proposed</p> <p>Establish bunded tanks pads and tanks fitted with leak detection at the above Wellpads.</p>				<p>IMP 4-3 Section 3. Description of regulated activity 3.1 Overview of the activities proposed</p> <p>Establish bunded tank pads with accommodation of 110% the volume of the largest tank, unless the container is equipped with individual secondary containment as per the Code of Practice: Onshore Petroleum Activities at</p>			

	<p>the above wellpads. If the container is equipped with individual secondary containment, a 1m earthen bund will surround any in-ground treatment tanks and / or double lined above ground tanks. Tanks will be fitted with leak detection.</p>
<p>IMP 4-3 Section 3. Description of the regulated activity 3.17.6 Containment of Contaminants Chemical Storage: Hazardous chemicals are to be stored within secondary containment with sufficient capacity to hold 110% of the volume of the largest container stored or with a double-lined/walled storage tank</p>	<p>IMP 4-3 Section 3. Description of the regulated activity 3.17.6 Containment of Contaminants Chemical Storage: No amendment to current EMP text.</p>
<p>IMP 4-3 Section 3. Description of the regulated activity 3.17.6 Containment of Contaminants Use storage and handling of materials on a site of petroleum activities:</p> <ul style="list-style-type: none"> • Which are or contain hazardous chemicals will comply with WHS legislation and appropriate standards for the type of chemicals. • Will follow their approved safety data sheet. <p>Liquid chemicals that may cause environmental harm will be stored in double-lined tanks or bunded areas. Bunds will have sufficient capacity to hold 100% of the largest container volume stored in the area plus 10%, unless the container is equipped with individual secondary containment.</p>	<p>IMP 4-3 Section 3. Description of the regulated activity 3.17.6 Containment of Contaminants Use storage and handling of materials on a site of petroleum activities:</p> <p>No amendment to current EMP text.</p>
<p>Appendix 01.02 Baseline Environmental Assessment Report Section 1.2 Proposed Seismic and Exploration Program Location</p>	<p>Appendix 01.02 Baseline Environmental Assessment Report Section 1.2 Proposed Seismic and Exploration Program Location</p>

<p>The proposed 2021-2025 exploration activities include:</p> <ul style="list-style-type: none"> • Establish banded tanks pads and tanks fitted with leak detection at the above well site 	<p>The proposed 2021-2025 exploration activities include:</p> <ul style="list-style-type: none"> • Establish banded tank pads with accommodation of 110% the volume of the largest tank, unless the container is equipped with individual secondary containment as per the Code of Practice: Onshore Petroleum Activities at the above wellpads. If the container is equipped with individual secondary containment, a 1m earthen bund will surround any in-ground treatment tanks and / or double lined above ground tanks. Tanks will be fitted with leak detection.
<p>Appendix 04: Risk Assessment</p> <p>Risk #49: Controls to prevent Impact to soil quality.</p> <ul style="list-style-type: none"> • Open-topped wastewater treatment tanks and pits will be marked and operated with 1.1m of freeboard during the wet season, and 0.5m of freeboard during the dry season • Closed-topped tanks will be marked and operated with 0.5m of freeboard • Wastewater tanks and pits will be fitted with level monitoring telemetry that reports back to the operations team • Wastewater tanks and pits will be inspected daily to check integrity during periods of site operations • Wellpad activities to cease if freeboard is not maintained in wastewater tanks and pits • Daily monitoring of weather and for predicted significant rainfall events will be undertaken • Pits will be appropriately designed and constructed with a 0.5m of bund to prevent entry of overland flow • Tank pad to be compacted to engineering design specifics of Original Equipment Manufacturer (OEM) 	<p>Appendix 04: Risk Assessment</p> <p>Risk #49: Controls to prevent Impact to soil quality.</p> <p>The listed control:</p> <ul style="list-style-type: none"> • “Banded tank pad will accommodate 110% of the volume of the largest tank” <p>will be modified to...</p> <ul style="list-style-type: none"> • “Banded tank pad will accommodate 110% of the volume of the largest tank, unless the container is equipped with individual secondary containment as per the Code of Practice: Onshore Petroleum Activities. If the container is equipped with individual secondary containment, a 1m earthen bund will surround any in-ground treatment tanks and / or double lined above ground tanks.”

<ul style="list-style-type: none"> • Bunded tank pad will accommodate 110% of the volume of the largest tank • Wastewater tanks and pits will be inspected weekly for liner and structural integrity • Implementation of an approved Wastewater Management Plan • Code of Practice: Onshore Petroleum Activities (the Code) will be implemented. 	
<p>Appendix 04: Risk Assessment Risk #57: Controls to prevent Contamination of aquifer impacting a receptor (groundwater user or GDE)</p> <ul style="list-style-type: none"> • Open-topped wastewater treatment tanks and pits will be marked and operated with 1.1m of freeboard during the wet season, and 0.5m of freeboard during the dry season • Closed-topped tanks will be marked and operated with 0.5m of freeboard • Wastewater tanks and pits will be fitted with level monitoring telemetry that reports back to the operations team • Wastewater tanks and pits will be inspected daily to check integrity during periods of site operations • Wellpad activities to cease if freeboard is not maintained in wastewater tanks and pits • Daily monitoring of weather and for predicted significant rainfall events will be undertaken • Pits will be appropriately designed and constructed with a 0.5m of bund to prevent entry of overland flow • Tank pad to be compacted to engineering design specifics of Original Equipment Manufacturer (OEM) 	<p>Risk #57: Controls to prevent Contamination of aquifer impacting a receptor (groundwater user or GDE)</p> <p>The listed control:</p> <ul style="list-style-type: none"> • “Bunded tank pad will accommodate 110% of the volume of the largest tank” <p>will be modified to...</p> <ul style="list-style-type: none"> • “Bunded tank pad will accommodate 110% of the volume of the largest tank, unless the container is equipped with individual secondary containment as per the Code of Practice: Onshore Petroleum Activities. If the container is equipped with individual secondary containment, a 1m earthen bund will surround any in-ground treatment tanks and / or double lined above ground tanks.”.

<ul style="list-style-type: none"> • Bunded tank pad will accommodate 110% of the volume of the largest tank • Wastewater tanks and pits will be inspected weekly for liner and structural integrity • Implementation of an approved Wastewater Management Plan • Code of Practice: Onshore Petroleum Activities (the Code) will be implemented. 	
<p>Appendix 06 Waste and Wastewater Management Plan Section 6.1 Waste Storage</p> <p>Above-ground open-topped treatment tanks– that will be:</p> <ul style="list-style-type: none"> • Designed and constructed following the relevant Australian Standards (including AS1554.1 and AS3990). • Designed to withstand bushfires and have a <30m fire break. • Designed to meet local wind loading conditions. • Installed on pads that are constructed as per vendor requirements to ensure stability. • Fitted with a secondary liner to prevent leakage if the primary liner develops a leak. • Fitted with a leak detection system between the primary and secondary liner to notify of any potential leaks in the primary liner. • Fitted with level monitoring equipment that includes a high-level alarm that is calibrated for the appropriate freeboard for the season. • Designed and operated to prevent overtopping. • Marked with the appropriate freeboard for the operational status. • Fitted with Fauna ladders. 	<p>Appendix 06 Waste and Wastewater Management Plan Section 6.1 Waste Storage</p> <p>Add –</p> <ul style="list-style-type: none"> • Surrounded by a 1m earthen bund.
<p>Appendix 06 Waste and Wastewater Management Plan Figure 9 EP 187 Indicative Wellpad footprint with tank layouts</p>	<p>Appendix 06 Waste and Wastewater Management Plan Figure 9 EP 187 Indicative Wellpad footprint with tank layouts</p>

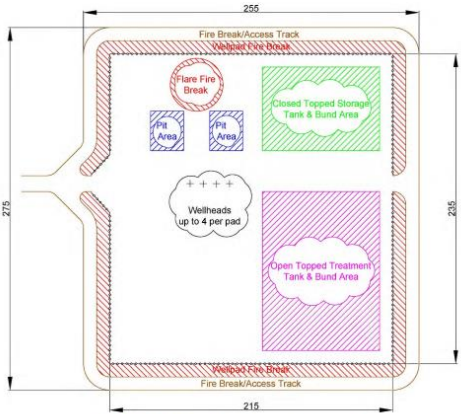


Figure 9: EP187 Indicative Wellpad footprint with tank layouts

No amendment to EMP figure. Figure does not specify capacity of bund.

**Appendix 06 Waste and Wastewater Management Plan
Figure 10 EP 187 Indicative Multiwell Wellpad, Cut and Fill layout**

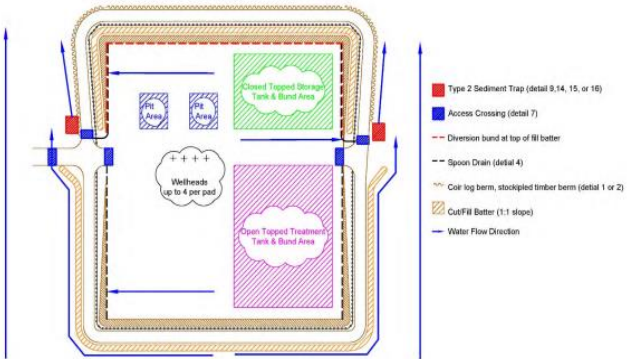


Figure 10: EP187 Indicative Multiwell Wellpad, Cut and Fill layout

**Appendix 06 Waste and Wastewater Management Plan
Figure 10 EP 187 Indicative Multiwell Wellpad, Cut and Fill layout.**

No amendment to EMP figure. Figure does not specify capacity of bund.

<p>Appendix 06.01 HF Chemical Risk Assessment Hydraulic Stimulation Chemical Risk Assessment Update 2.1 Conceptual Exposure Model</p> <p>To assess the unmitigated risks from the improbable scenario where some fluids were to overflow the bunded area, a range of release scenarios are considered comprising:</p> <ul style="list-style-type: none"> • Smaller release volumes of 1,000L and 100,000L which would reflect small scale releases, and • An improbable release out of the bunded area (1,000,000 L). <p>Appendix B provides an assessment of the potential for effects on groundwater associated with a release of hydraulic fracturing fluid, waste or flowback to the land surface scenarios. The results of this assessment showed the travel times for surface releases to reach groundwater are very long, thereby providing ample opportunity for containment and remedial action. Therefore, the potential for impacts to groundwater is considered low.</p> <p>As part of the assessment, both mitigated and unmitigated risks from an overland flow scenario from a release have been assessed. inGauge has proposed to construct a 2ha well pad, with 1m high berm walls surrounding any inground treatment tanks and/or double-lined aboveground tanks to contain and manage the risk from potential releases. In the absence of this structure, a major release could have the potential to migrate a distance off the well pad. However, with these measures, any releases would be limited to the potential for incidental/minor spillage outside the fluid storage and containment area.</p> <p>In the context of a potential release scenario of 100,000L outside of the containment and storage area, the maximum affected area of spreading will be less than 4.7ha and limited to the proximity of the release area.</p>	<p>Appendix 06.01 HF Chemical Risk Assessment Hydraulic Stimulation Chemical Risk Assessment Update 2.1 Conceptual Exposure Model</p> <p>No amendment to EMP text.</p>
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<p>Therefore, given the planned management control of the construction of a bunded area surrounding treatment tanks, the potential for a complete exposure pathway to surface water bodies associated with runoff from an accidental release is considered unlikely and not assessed further.</p>	
<p>Appendix 07 Spill Management Plan Table 2 Potential Spill Scenarios</p> <p>Spill Scenario: Tank, drilling pit and containment vessel overflows and structural failures</p> <p>Mechanisms:</p> <ul style="list-style-type: none"> • Overfilling of a pit and Flowback tank or pit • Structural failure of embankment or tank wall <p>Quantity: >10,000L</p> <p>Location: Drilling Pits, Closed-topped storage tanks, Open topped treatment tanks</p> <p>Key Management Controls:</p> <ul style="list-style-type: none"> • Daily inspection of pit and tank integrity during operations • Monitoring of pit and tank freeboard level during operation • Tank pads are bunded and capable of holding the carrying capacity of wastewater on the tank pad. 	<p>Appendix 07 Spill Management Plan Table 2 Potential Spill Scenarios</p> <p>The listed control:</p> <ul style="list-style-type: none"> • “Tank pads are bunded and capable of holding the carrying capacity of wastewater on the tank pad.” <p>will be removed and modified to...</p> <ul style="list-style-type: none"> • “An annual inspection of tank integrity will be undertaken by the original equipment manufacturer. A 1m earthen bund around the tank will be installed to avoid overland flow causing washouts that may lead to structural failure.” <p>Include additional Key Management Control:</p> <ul style="list-style-type: none"> • Freeboard to be managed according to the season.
<p>Appendix 07 Spill Management Plan Table 3 Worst Case Scenarios</p> <p>Leak: Flowbank Tank</p> <p>Total volume that could be lost: 3,756,000L</p> <p>Maximum likely time to locate the leak:</p> <ul style="list-style-type: none"> • 12h on non-operational sites (Daily fluid levels are reviewed) • 2h during operations 	<p>Appendix 07 Spill Management Plan Table 3 Worst Case Scenarios</p> <p>The Risk: “In the event of a catastrophic failure of a tank, all wastewater will be contained within the bunded site. The site has the capacity to contain the full tank volume”</p> <p>will be removed and updated to:</p>

<p>Risk: In the event of a catastrophic failure of a tank, all wastewater will be contained within the bunded site. The site has the capacity to contain the full tank volume.</p>	<p>The Risk: “The risk of catastrophic failure of the tank is managed by regular field inspections, annual inspections of structural integrity by the OEM, and a 1m earthen bund being placed around the tank to prevent washouts undermining the tank structure.”</p>
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Section A - Code of Practice: Onshore Petroleum Activities (the Code)

The proposed modification is consistent with the requirements of the Code of Practice: Onshore Petroleum Activities (the Code) in the NT.

Environment Management Plans are required by law to demonstrate how the Code will be complied with in the proposed activities. This modification to IMP4-3 brings the commitments into alignment with the Code which states:

A.3.8 Containment of contaminants:
(g) Secondary containment must meet all of the following:
i. sufficient capacity to hold 100% of the volume of the largest container stored in the area plus 10%, unless the container is equipped with individual secondary containment.

It is Imperial’s intention to always adhere to the Code as best industry practice.

Section B - Petroleum (Environment) Regulations 2016

The proposed modification is consistent with the requirements of the Petroleum (Environment) Regulations 2016.

This modification to IMP4-3 is a more comprehensive description of the regulated activity. This is consistent with the Regulations which states:

Schedule 1 Information to be included in environment management plan
Part 1 Regulated activity and environment
1 Description of regulated activity
A plan must give a comprehensive description of the regulated activity to which it relates and include:
(b) general details of the construction and layout of any facility associated with the activity;

It is imperial’s intention to provide a modification which provides more details than the original IMP4-3 submission.

Section C – Risk Profile

The proposed modification does not inadvertently change the risk profile.

Imperial has assessed the potential or actual change to the impacts and risks and provides the following evidence to demonstrate that the risk profile (ie likelihood ad consequence ratings) is not inadvertently changed.

Current risk profile of risks in IMP4-3 Appendix 04 – Risk Assessment which refer to bunded wastewater tanks.

Risk #	Risk Source	Potential Impact	Risk Management Controls	Consequence	Likelihood	Residual Risk	ALARP statement
49	Overflow of fluid storage/ Leaching from storage tanks	Impact to soil quality	<i>As per Appendix 04 text</i>	II (Minor)	D (Unlikely)	1	<i>As per Appendix 04 text</i>
57	Surface activities	Contamination of aquifer impacting a receptor	<i>As per Appendix 04 text</i>	IV (Major)	E (Remote)	1	<i>As per Appendix 04 text</i>

Profile of relevant risks in IMP4-3 Appendix 04 – Risk Assessment when applying the proposed modification that bunded tank pads will accommodate 110% of the volume of the largest tank, unless the container is equipped with individual secondary containment as per the Code of Practice: Onshore Petroleum Activities.

Risk #	Risk Source	Potential Impact	Risk Management Controls	Consequence	Likelihood	Residual Risk	ALARP statement
49	Overflow of fluid storage/ Leaching from storage tanks	Impact to soil quality	<i>Modified control - Bunded tank pads will accommodate 110% of the volume of the largest tank, unless the container is equipped with individual secondary containment as per the Code of Practice:</i>	II (Minor)	D (Unlikely)	1	<i>As per Appendix 04 text</i>

			<i>Onshore Petroleum Activities. If the container is equipped with individual secondary containment, a 1m earthen bund will surround any in-ground treatment tanks and / or double lined above ground tanks.</i>				
57	Surface activities	Contamination of aquifer impacting a receptor	<i>Modified control - Bunded tank pads will accommodate 110% of the volume of the largest tank, unless the container is equipped with individual secondary containment as per the Code of Practice: Onshore Petroleum Activities. If the container is equipped with individual secondary containment, a 1m earthen bund will surround any in-ground treatment tanks and / or double lined above ground tanks.</i>	IV (Major)	E (Remote)	1	<i>As per Appendix 04 text</i>

The residual risk rating remains at 1. When applying the Natural Environment Risk Assessment Framework from Table 1 IMP4-3 Appendix 03 – the consequence remains the same.

Section D – ALARP Demonstration

The proposed modification maintains that impacts and risks remain at ALARP and acceptable levels.

ALARP is maintained through meeting requirements of the Code and implementing all reasonably practicable site-specific controls.

Imperial deems the environmental impacts and risks associated with the containment of contaminants in wastewater bunded tank pads which accommodate 110% of the volume of the largest tank, unless the container is equipped with individual secondary containment as per the Code of Practice: Onshore Petroleum Activities As Low As Reasonably Practicable (ALARP) based on:

- Good Practice Control Measures: the proposed modification complies with the Code.
- Good Industry Practice: Engineering control standards include:
 - Above ground-open topped tanks designed and constructed following the relevant Australian Standards (including AS1554.1 and AS3990)
 - Fitted with a secondary liner to prevent leakage if the primary liner develops a leak
 - Fitted with a leak detection system between the primary and secondary liner to notify of any potential leaks in the primary liner.
 - Fitted with level monitoring equipment that includes a high-level alarm that is calibrated for the appropriate freeboard for the season.
- Professional Judgement:
 - Daily inspections of tank integrity and weather by competent and experienced personnel.
- Risk-based tools:
 - Appendix 06.01 HF Chemical Risk Assessment is based on berm walls and / or double lined above ground tanks.
- Precautionary approach:
 - A conservative freeboard approach is undertaken. Open-topped wastewater treatment tanks and pits will be marked and operated with 1.1 metres of freeboard during the wet season (based on 1/1000-year rain event), and 0.5 metres of freeboard during the dry season.
 - Wastewater storage tanks are fitted with fauna ladders.
 - Constructed 1m earthen bund to divert overland flow from undermining the tank liner and prevent vehicles from approaching.

Section E – Environmental Outcomes

The proposed modification maintains that the Environmental outcomes as stated in the EMP remain achievable.

IMP 4.3 Section f. outlines the key environmental outcomes which remain achievable with the proposed modification:

- Conduct of the regulated activity does not create safety risks for the public or landholders.
- Sensitive receptors, significant conservation areas, or listed species or their habitat is not permanently affected by the conduct of the regulated activity.
- Terrestrial environmental quality, including surface waters, is not permanently affected by the regulated activity's conduct.
- The conduct of the regulated activity does not result in the over-extraction or contamination of groundwater resources.
- Local inland water quality is not permanently affected by the conduct of the regulated activity.
- Minimise emissions, including greenhouse gases, created by the conduct of the regulated activity.

Utilising wastewater bunded tank pads which accommodate 110% of the volume of the largest tank, unless the container is equipped with individual secondary containment as per the Code, will not comprise these performance outcomes.

Section F – Environmental Performance Standards

The proposed modification aligns with IMP4-3 existing environmental performance standards and measurement criteria.

Utilising wastewater bunded tank pads which accommodate 110% of the volume of the largest tank, unless the container is equipped with individual secondary containment as per the Code, aligns with existing environmental performance standards:

IMP 4-3 Table 30 Current Environmental Performance Standards	IMP 4-3 Table 30 Current Measurement Criteria
No instances of overtopping of pits, Flowback Water and Produced Water tanks due to significant weather events	<ul style="list-style-type: none"> • No overtopping to occur due to significant rain events • Records show that the daily wet season weather forecast checks occur • Records show that weekly wet-season forecast calculations to determine the available storage capacity occur
Maintain the freeboard in open-topped wastewater treatment tanks over the wet season	<ul style="list-style-type: none"> • No overtopping events to occur during the wet season as a result of excessive rain
All hazardous chemicals or those that may cause environmental harm to be stored in secondary containment, which has sufficient capacity to hold 100% of the volume of the largest container stored unless the container has its own secondary containment.	<ul style="list-style-type: none"> • Site induction records show all personnel inducted and induction materials include requirements related to the use and storage of hazardous chemicals. • Weekly inspection records confirm all hazardous materials stored in compliance with relevant SDS. • Inspection records confirm that all hazardous chemicals are stored in secondary containment, which can hold 100% of the largest container, weekly during the dry season and daily during the dry season. • Weekly inspection records confirm tanks and storage vessels intact and free from defects or tears.

	<ul style="list-style-type: none"> • Incident management system includes records of failures of the integrity of storage vessels.
<p>No instances of loss of containment of wastewater</p>	<ul style="list-style-type: none"> • Incident management system includes records of loss of containment of wastewater • Site induction records show all personnel inducted, and induction materials include requirements related to wastewater storage. • All tanks marked with freeboard levels as per seasonal requirements • Daily inspections confirm wastewater levels do not exceed freeboard • Records of exceedance of the freeboard are included in the incident management system and evidence of corrective actions and preventative measures implemented • A minimum of 1.1m freeboard will be maintained in all tanks/ pits that contain Flowback Fluid and Produced Water throughout the wet season • Any wastewater flowline leak reported to DEPWS
<p>Freeboard for all pits, Flowback Water and Produced Water tanks maintained at all times</p>	<ul style="list-style-type: none"> • Site induction records show all personnel inducted, and induction materials include requirements related to the storage of wastewater. • All tanks marked with freeboard levels as per seasonal requirements • Daily inspections confirm wastewater levels do not exceed freeboard • Records of exceedance of the freeboard are included in the incident management system and evidence of corrective actions and preventative measures implemented

	<ul style="list-style-type: none"> • A minimum of 1.1m freeboard will be maintained in all tanks/pits that contain Flowback Fluid and Produced Water throughout the wet season
<p>All hazardous chemicals or those that may cause environmental harm to be stored in secondary containment, which has sufficient capacity to hold 100% of the volume of the largest container stored unless the container has its own secondary containment.</p>	<ul style="list-style-type: none"> • Site induction records show all personnel inducted and induction materials include requirements related to the use and storage of hazardous chemicals • Weekly inspection records confirm all hazardous materials stored in compliance with relevant SDS • Weekly inspection records confirm that all hazardous chemicals are stored in secondary containment, which has a capacity to hold 100% of the largest container. • Weekly inspection records confirm that all hazardous chemicals are stored in secondary containment which has a capacity to hold 100% of the largest container. • Inspection records confirm tanks and storage vessels intact and free from defects or tears • Incident management system includes records of failures of the integrity of storage vessels.
<p>No pit or tank failure due to flooding inundation</p>	<ul style="list-style-type: none"> • Wellpad location based on 1 in 100-year ARI Flood modelling • Pits to be constructed with 500mm bund to prevent water entry from overland flow. • Pits to be constructed with 500mm bund to prevent escape of water from a catastrophic failure will prevent water entry from overland flow
<p>All storage vessels for wastewater and hazardous substances are maintained at 100% integrity</p>	<ul style="list-style-type: none"> • Daily inspection records confirm tanks and storage vessels intact and free from defects or tears

		<ul style="list-style-type: none">• Incident management system includes records of failures of integrity of storage vessels	
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