



# **Annual Environmental Performance Report**

Mereenie Oil and Gas Field Maintenance Upgrades,  
Central Treatment Plant Environmental  
Management Plan

**August 2020**

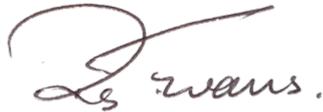
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### Document Control

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### Signature and Certification

We hereby declare that the information provided in this annual environment performance report and accompanying documents is to the best of our knowledge, true and correct.	
<b>Signature</b>	
<b>Name</b>	Ross Evans
<b>Position</b>	Chief Operating Officer
<b>Date</b>	2 September 2020

## Glossary

Abbreviation / Acronyms	Definition
<b>AEPR</b>	Annual Environment Performance Report
<b>CoP</b>	Code of Practice
<b>CP</b>	Central Petroleum Limited
<b>CTP</b>	Central Treatment Plant
<b>DENR</b>	Department of Environment and Natural Resources
<b>DAWE</b>	Department of Agriculture, Water and Environment
<b>DLRM</b>	Department of Land and Resource Management
<b>DPIR</b>	Department of Primary Industry and Resources
<b>EMP</b>	Environmental Management Plan
<b>EPA</b>	Environment Protection Authority
<b>EPS</b>	Environmental Performance Standard
<b>FBC</b>	Field Boost Compressors
<b>FEMP</b>	Field Environment Management Plan
<b>HS&amp;E</b>	Health, Safety and Environment
<b>LCM</b>	Local Community Meeting
<b>MRN</b>	Mereenie
<b>NEMP</b>	National Environment Management Plan
<b>NT</b>	Northern Territory
<b>OL4</b>	Operating Licence Four
<b>OL5</b>	Operating Licence Five
<b>TO</b>	Traditional Owner

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# 1.0 Introduction

This Annual Environment Performance Report (AEPR), as required under the Petroleum (Environment) Regulations 2016 (NT), is presented to report on the environmental performance of Central Petroleum (CP) as the operator of the Mereenie Joint Venture in respect of achieving the environmental outcomes and performance standards, and monitoring, recording and reporting requirements.

The report includes sufficient information to allow the minister to assess CP’s compliance with the obligations described within the Mereenie Oil and Gas Field Maintenance Upgrades, Central Treatment Plant (CTP) EMP approved 1 November 2018 and any other law in force in the Northern Territory related to conduct of the regulated activity.

The AEPR covers the period from 1 November 2018 to 31 October 2019. The CTP upgrade was conducted in two stages:

1. Major shut down activities
2. Roofing and gantry installation activities

Preliminary work commenced in July 2018 in accordance with the existing approved Mereenie Field Environment Management Plan. Activities under the MRN CTP Maintenance Upgrade EMP were conducted during the shaded periods shown in Figure 1-1. Outside of the shaded areas the site was managed under the approved Mereenie Oil and Gas Field Environmental Management Plan. All activities conducted under the MRN CTP Maintenance Upgrade EMP were completed by 31 October 2019.

Activity	2018		2019									
	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct
Stage 1 – Major shut down	←→											
Stage 2 - Roofing and gantry installation											←→	

**Figure 1-1 Dates EMP activities were conducted**

## 1.1 Background

The regulated activities conducted under the MRN CTP Maintenance Upgrade EMP relate to the addition of two larger separators to replace two small separators at the inlet of the plant and addition of one new field boost compressor. These activities comprised the:

- Excavation of footing and installation of posts (piles, pile caps and supports) for new infrastructure (124 piles at depth 5-7m with diameter of 100-325mm).
- Temporary stockpiling of soil generated during piling.
- Transportation of new infrastructure and equipment (2 x franna cranes, pile rigs, radiation source for NDR) to site.
- Onsite installation of equipment on piles.
- Installation of pipework, instrumentation, electrical cabling. Prefabricated pipework spools used to minimise hot works.
- Installation of new pipework tested offsite prior to mobilisation to reduce on-site hydrostatic testing requirements.
- Hydrostatic test water sourced from MRN bores and disposed of in existing evaporation ponds.
- Radioactive testing of installed infrastructure.

Work on installing the roof on the new field boost compressor and the platforms around the new separators was decoupled from the main scope and completed at a later date in September and October 2019.

In relation to the above activities, it should be noted that:

- All activities were conducted within the existing disturbed, cleared, maintained fenced operational area (i.e. the CTP and workshops)
- No vegetation clearing
- Existing roads and access tracks were used
- All staff were housed at the existing Mereenie Camp

The location of the Mereenie field is shown in Figure 1-2, with the location of the regulated upgrade project activities at site are displayed in Figure 1-3.

## 1.2 Contents of Performance Report

This AEPR describes the environmental performance of CP by evaluating the following:

1. Compliance with Ministerial approval conditions
2. Compliance with each environmental outcome and performance standard within the approved EMP
3. Compliance with reporting requirements in accordance with regulations
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

The Code of Practice: Onshore Petroleum Activities in the Northern Territory (legislated 11 June 2019) was after the approval of the MRN CTP Maintenance Upgrade EMP and therefore is not applicable to the activities in the EMP.

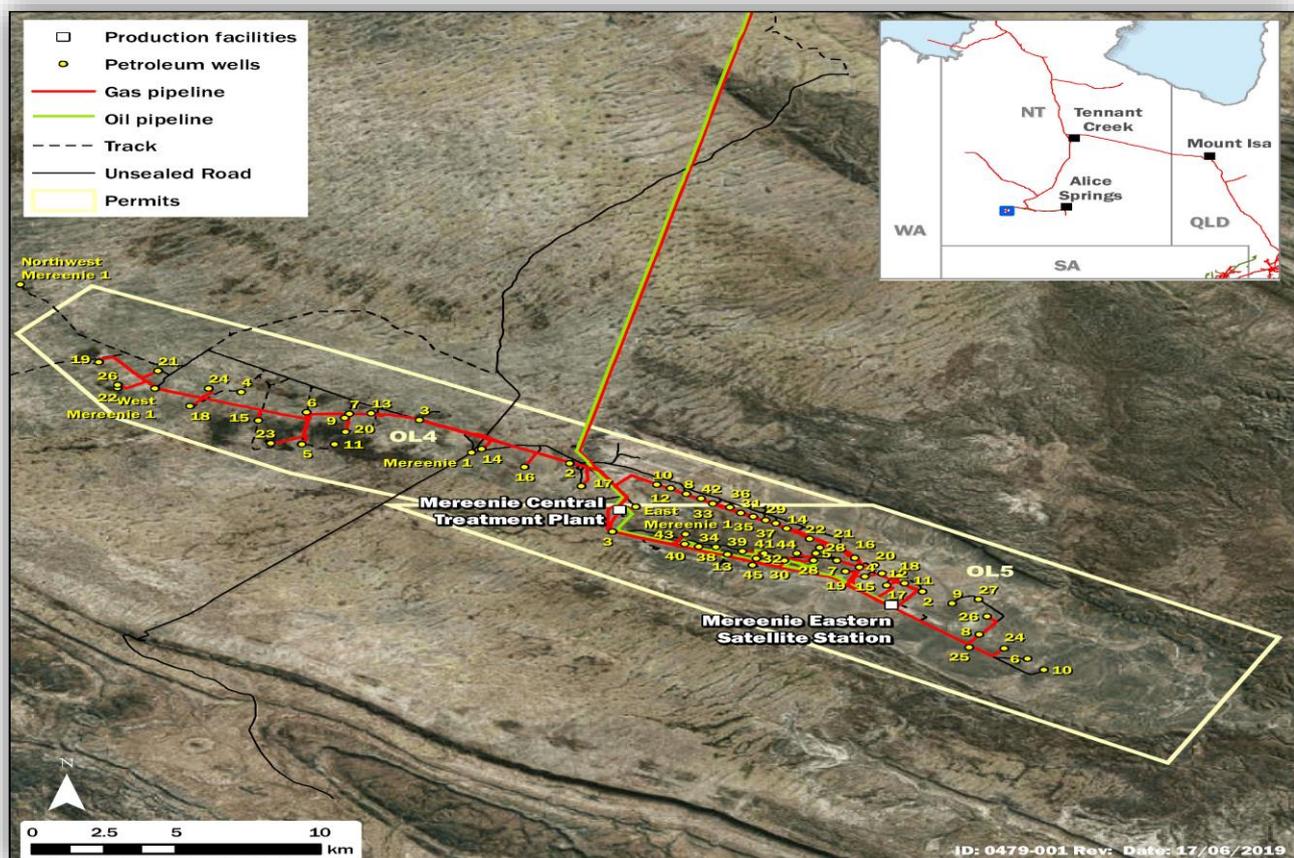


Figure 1-2 Location of the Mereenie Field

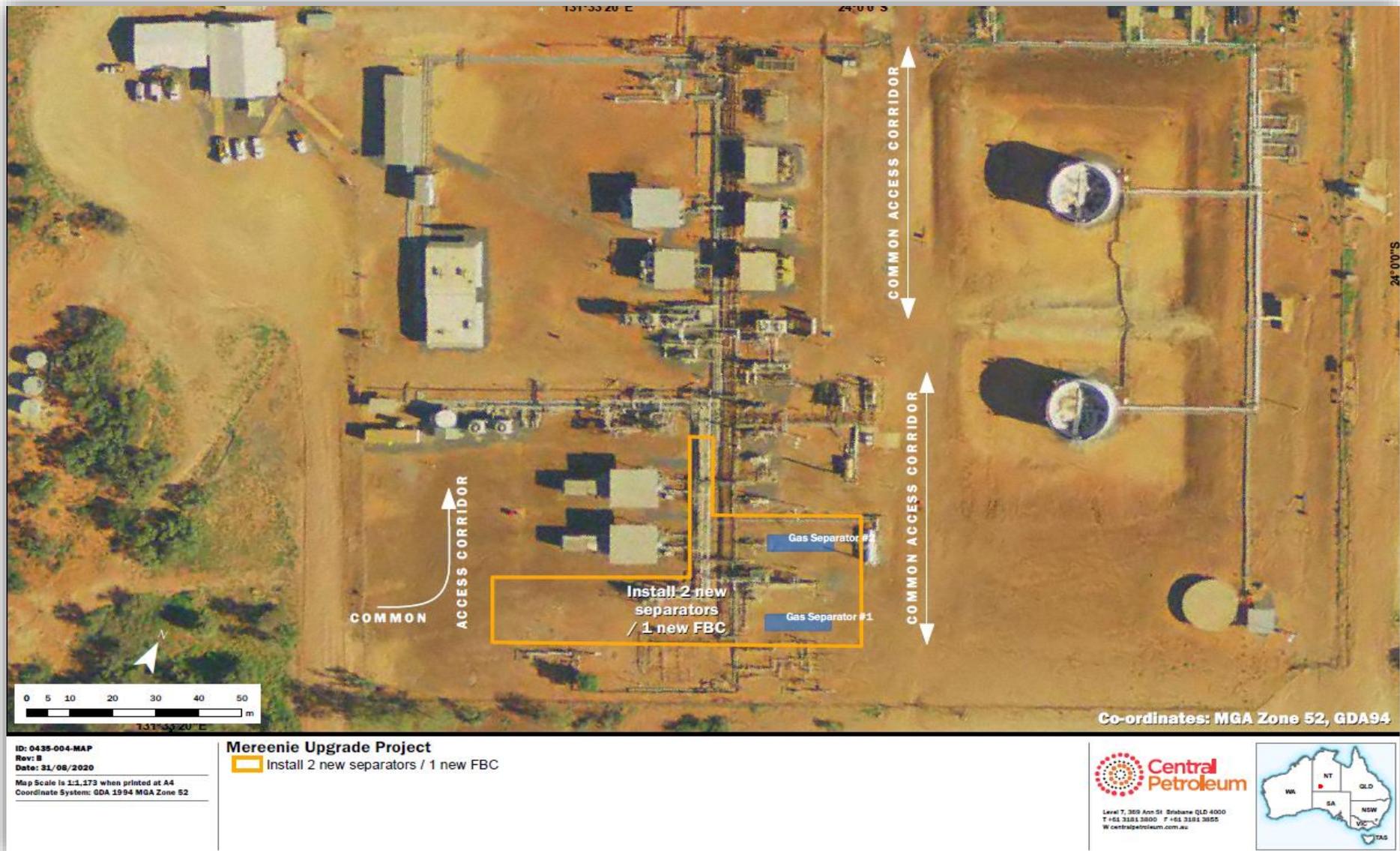


Figure 1-3 Location of the Maintenance and Upgrade Works at the Mereenie Field CTP

### 1.3 Assessment of Compliance

Table 1-1 shows the compliance status indicators used in the AERP.

**Table 1-1 Compliance Descriptors**

Indicator	Description
<b>Compliant</b>	Compliant with requirement for entire 12-month reporting period
<b>Partially Compliant</b>	Compliant with requirement for most of the year, short periods of non-compliance
<b>Not Compliant</b>	Not compliant with the requirement during the reporting period
<b>Not Applicable</b>	Requirement not applicable during the reporting period

### 1.4 Evidence of Compliance

The following sources of evidence are used to demonstrate compliance:

1. Internal tracking of compliance by CP through:
  - Inspections, as committed to in the EMP, as follows:
    - MRN CTP Maintenance and Upgrade EMP
  - Our incident management system
  - Quarterly environmental inspections
    - November 2018, March / June / September 2019
  - Monthly, weekly and daily project reports
  - Area inspection reports
  - Various registers in place including:
    - animal control, waste, hazardous goods, chemical
  - External annual audits of compliance as follows:
    - MRN FEMP audits, conducted on February 2018 and June 2019
2. Reports provided under the National Greenhouse and Energy Reporting Act
3. Outcome from regulatory inspections conducted by the Department of Environment and Natural Resources (DENR), Petroleum Operations
4. Recordable and reportable incident reports submitted to DENR Petroleum Operations
5. Reports provided to DENR, the Department of Primary Industries and Resources (DPIR) and other government agencies.

## 2.0 Demonstration of Compliance

### 2.1 Ministerial Approval Conditions

No Ministerial approval conditions were applied to the approval of the Maintenance Upgrades, CTP EMP.

### 2.2 Environmental Outcomes and Environmental Performance Standards

Table 2-1 provides a systematic overview of CP’s compliance with the environmental outcomes and environmental performance standards within the approved MRN Maintenance Upgrades, CTP EMP.

As indicated in section 9.1 of the EMP Environmental Objective and Outcomes, ‘the environmental objectives and performance standards for the CTP maintenance and upgrade activities are as per the CP MRN Field Environmental Management Plan 2017’. Therefore, as recommended by DENR, the environmental outcomes for the EMP (as listed in Table 2-2) are sourced from Table 8-1 of the MRN FEMP and the environmental performance standards sourced from Table 8-2 of the MRN FEMP.

**Table 2-1 Compliance with Environmental Outcomes and Environmental Performance Standards**

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
1	Prevent impacts to land and soil, as a result of erosion and sedimentation during the CTP upgrade and maintenance activities	No unauthorised clearing	Not Applicable	No clearing was required or undertaken during the project, all activities were undertaken within previously cleared areas, therefore, the EPS was not triggered.
		Location of topsoil mounds will be clearly marked and less than 1.5m high	Compliant	Instructions provided to contractors and confirmation of a visual inspection by the project manager confirmed that during the project the one instance of temporarily removed excavated material was stored appropriately before being re-spread over the impacted area once piles were installed.
		No off-road driving	Compliant	Incident management system records during the project did not identify any instances of unauthorised off-road driving.
		No unauthorised third-party access	Compliant	Incident management system records during the project did not identify any instances of unauthorised access to site.
		Areas no longer required for safe operation will commence rehabilitation within 12 months of decommissioning	Not Applicable	No rehabilitation was needed as all activities were undertaken within previously cleared, industrial use areas and the area is currently being used for operational activities as approved the MRN FEMP. Therefore, the EPS has not been triggered.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		All erosion and sedimentation control devices will be compliant with DENR and best practice guidelines	Compliant	Area inspections records confirmed that during the project erosion and sedimentation control devices were in place and compliant with DENR and best practice guidelines. Incident management system records during the project did not identify any instances of erosion as a result of project activities.
		No windrows or concentration points	Compliant	Area inspections records during the project did not identify any windrows or concentration points on any project related areas.
		Disturbed areas will be restored to a landform consistent with surrounding environment with no blocking of drainage channels or water courses	Not Applicable	No rehabilitation was needed as all activities were undertaken within previously cleared, industrial use areas and the area is currently being used for operational activities as approved in the MRN FEMP. Therefore, the EPS has not been triggered.
		No new erosion or sedimentation will occur on rehabilitated surfaces first significant rainfall	Not Applicable	No rehabilitation was needed as all activities were undertaken within previously cleared, industrial use areas and the area is currently being used for operational activities as approved in the MRN FEMP. Therefore, the EPS has not been triggered.
		All staff will be inducted to the FEMP / EMP	Compliant	MRN site induction records during the project identified that all employees and contractors were inducted prior to or upon arrival at site and before any work commenced. Incident management system records during the project did not identify any employees and contractors who were not inducted. Induction materials include content which deals with impacts to land and soil, as a result of erosion and sedimentation.
		Respreading spoil from piling activity.	Compliant	Area inspections records confirmed that during the project all temporarily removed excavated material re-spread over the impacted area once piles were installed.
		Supply DPIR / DENR with reports of rehabilitation audits conducted including information on any corrective information: - During operations - Directly after completion of operations and rehabilitation - Following the first wet season	Not Applicable	No rehabilitation was needed as all activities were undertaken within previously cleared, industrial use areas and the area is currently being used for operational activities as approved in the MRN FEMP. Therefore, the EPS has not been triggered.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Conduct visual inspections of installed erosion and sediment control devices, to ensure conformance with DENR and IECA best practice guidelines, at the beginning of operations then following any significant rainfall events (>10mm in 74 hours)	Compliant	Area inspections records confirmed that during the project erosion and sedimentation control devices were in place and compliant with DENR and IECA best practice guidelines. Incident management system records during the project did not identify any instances of erosion as a result of project activities. No records of any rainfall events during the project which would have prompted specific visual inspections .
2	Prevent surface and groundwater degradation, contamination or alteration, as a result of the CTP upgrade and maintenance activities	Clearing works or disturbance will not affect the long-term stability of existing drainage channels or water courses	Not Applicable	No clearing of new areas was required or undertaken during the project therefore the EPS was not triggered.
		No long-term impact to groundwater resources will occur in the area	Compliant	The EMP indicated that project activities were unlikely to interact with any groundwater systems. However, groundwater extraction records across MRN and testing results at the nearest bore did not identify any adverse impacts during the project.
		All spills or leaks of hazardous material will be remediated in accordance with the NEMP guidelines.	Not Applicable	Incident management system / project reports records during the project did not identify any instances of spills and leaks hence no remediation was necessary, and the EPS was not triggered.
		All staff inducted will be inducted to the FEMP/EMP	Compliant	MRN site induction records during the project identified that all employees and contractors were inducted prior to or upon arrival at site and before any work commenced. Incident management system records during the project did not identify any employees and contractors who were not inducted. Induction materials include content which deals with surface and groundwater water on site.
		Sampling and developing a rehabilitation plan in the event of surface water contamination resulting from the activities	Not Applicable	Incident management system records did not identify any surface water contamination resulting from the activities therefore the EPS was not triggered.
		Record the quantity of groundwater extracted using a flow meter, when the volume extracted was >2000L	Compliant	Groundwater extraction records detail the amount of water extracted from each active bore on site during the project.
3	Prevent loss of biodiversity, as a	No off-road driving	Compliant	Incident management system records during the project did not identify any instances of unauthorised off-road driving.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	result of the CTP upgrade and maintenance activities	No speeding	Compliant	Incident management system records during the project did not identify any instances of vehicles speeding.
		No driving at night-time unless authorised	Compliant	Incident management system records during the project did not identify any instances of unauthorised night-time driving. Also, journey management system records didn't identify any approved night-time driving.
		No driving under the influence of alcohol, BAC=0	Compliant	Incident management system records during the project did not identify any instances of employees or contractors driving under the influence of alcohol.
		No fauna fatalities	Compliant	Incident management system records and the animal control register during the project did not identify any instances of fauna fatalities related to the project.
		All waste receptacles will have secure lids to prevent fauna access / interference	Compliant	Regular area inspections did not identify any instances where waste receptacles did not have secure lids to prevent fauna access / interference. Maintenance records did identify any instances where work orders were raised for receptacles to be replaced or fitted with fauna proof secure lids
		No weeds will be present in areas where fill has been used	Not Applicable	No fill was used during the project therefore the EPS was not triggered.
		All spills or leaks of hazardous material will be remediated in accordance with the NEMP guidelines	Not Applicable	Incident management system / project reports records during the project did not identify any instances of spills and leaks hence no remediation was necessary, and the EPS was not triggered.
		No spills or leak of hazardous material will occur into the surrounding environment	Compliant	Incident management records did not identify any spills or leak of hazardous material which impact the surrounding environment.
		No unauthorised clearing	Not Applicable	No clearing was required or undertaken during the project, all activities were undertaken within previously cleared areas, therefore, the EPS was not triggered.
No unauthorised third-party access	Compliant	Incident management system records during the project did not identify any instances of unauthorised access to site.		

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		All vehicles will be serviced according to vehicle manufacturer specifications and frequency requirements and the NT Motor Vehicle registry standards	Compliant	All CP controlled vehicles used on the project were MRN field vehicles and closed work orders and schedules in our maintenance system confirmed that all vehicles have established preventative maintenance schedules and activities were executed in line with those requirements.
		No feeding of local fauna	Compliant	Induction material includes guidance on not feeding local fauna. Site induction records during the project identified that all employees and contractors were inducted. Incident management system records during the project did not identify any instances of employees or contractors feeding fauna.
		Conduct a weekly site inspection to detect evidence of unauthorised off-road driving	Partially Compliant	During the project there is no evidence of weekly checks being undertaken, however monthly checks were undertaken to detect evidence of unauthorised off-road driving. No incidents were captured in our incident management system.
		Every vehicle being checked for a weed free certificate prior to site mobilisation	Partially Compliant	Contractor engagement process includes the requirement for any vehicles brought to site to have a weed free certificate prior to site mobilisation. These checks were conducted however evidence of certificates were not able to be located as evidence in every instance.
		Record the location of any new weed infestations weekly during the activities	Not Applicable	Area inspection and incident management system records did not capture any new weed infestations during the project. Therefore, the EPS has not been triggered.
		Manage declared weeds in accordance with the Weed Management Act and MRN FEMP as required	Compliant	Weeds were managed in accordance with the Weed Management Act and MRN FEMP. Regular area inspections were undertaken, and a review of closed work orders confirmed that when weeds were identified, work order were raised to spray or remove the weeds.
		Record the number and location of introduced fauna as required during the activities	Not Applicable	Area inspection, incident management system records and the animal control register did not capture any introduced fauna during the project. Therefore, the EPS has not been triggered.
		Keep a fauna register of any sightings, near misses or strikes daily as required during the activities	Compliant	The animal control register was used during the project to record any instances of sightings, near misses or strikes as required during the activities.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Record any incidents involving speeding, and corrective active actions, daily as required during operations	Not Applicable	Incident management system records did not capture any incidents involving speeding during the project. Therefore, the EPS has not been triggered.
4	Prevent impacts to environmental values by managing waste streams generated during the CTP upgrade and maintenance activities	All waste receptacles will be fitted with fauna proof and secure lids	Compliant	Regular area inspections did not identify any instances where waste receptacles did not have secure lids to prevent fauna access / interference. Maintenance records did identify any instances where work orders were raised for receptacles to be replaced or fitted with fauna proof secure lids
		All waste will be separated and stored appropriately	Compliant	Area inspections / incident management records did not identify any instances where waste was not being separated and stored appropriately.
		All waste not requiring routine removal will be stored in a waste management area for re-use or ultimate offsite disposal	Compliant	Area inspections records during the project confirmed that all waste was stored appropriately in a designated waste area on site. Incident management system records during the project did not identify any instances where waste was not stored appropriately in the designated area.
		Waste will be removed by an appropriately licensed and NT EPA approved contractor where required	Compliant	Waste register in use during the project and incident management system records did not identify any instances where on site waste required to be removed was not conducted by an appropriately licensed and approved contractor.
		All waste removed from site will be recorded	Compliant	All waste removed from site is recorded in a register which includes the date of removal, type of waste, whether it is listed, volume of waste, who removed it and its destination.
		Only approved waste will be burnt in a designated burn pit	Not Applicable	No waste was burnt on site during the project therefore the EMPS was not triggered.
		Predator species and introduced fauna activity will be monitored around waste storage areas	Compliant	Animal control register in use during the project did not identify any instances of predator species and introduced fauna activity being spotted around waste storage areas. Incident management system records during the project did not identify any instances of predator species and introduced fauna activity being spotted around waste storage areas.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		No increase in invasive flora, NT declared weeds or WONs in waste disposal areas	Compliant	Weeds survey undertaken post project completion at MRN did identify some weeds in waste disposal areas, however these were minor and were controlled as part of regular activities.
		All listed waste will be disposed of in accordance with the NT EPA listed waste register	Compliant	All waste removed from site and disposed of is recorded in a register which includes the date of removal, type of waste, whether it is listed, volume of waste, who removed it and its destination. There were no instances identified of listed waste not being disposed of in accordance with the NT EPA listed waste register.
		All hazardous waste material will be separated in the appropriate area for disposal according to their SDS, the MRN FEMP and the hazardous goods register	Compliant	External and internal annual audits indicated that all hazardous waste was stored in an appropriate location near the warehouse. Incident management records did not identify any instances of hazardous waste material being stored incorrectly.
		All waste will be stored in appropriately bunded areas	Compliant	Area inspections and incident management records during the project did not identify any waste no being stored appropriately bunded areas.
		Waste will be managed according to the waste reduction hierarchy	Compliant	Discussion with site management and procurement indicated that efforts are continuously being made to reduce material imported to site and measures to re-use where possible or separation for recycling. Efforts are made on site to minimise the use of 'single' use water bottles with reusable drink bottles provided and used where practical.
		All waste generated will be placed in on-site waste receptacles	Compliant	Area inspections / Incident management system records during the project did not identify any waste not being placed in onsite waste receptacles.
		No accumulation of waste in vehicles	Compliant	Vehicle pre-start checklist prompt drinks to check to ensure vehicles are clean. A review of checklists conducted did not indicate any accumulated waste in vehicles.
		No contamination to soil from liquid waste	Compliant	Incident management system / project reports records during the project did not identify any instances of spills and leaks.
		Clean-up / spill kits will be provided in all relevant areas	Compliant	Area inspections records during the project confirmed that clean up and spill kits were located across the CTP. Incident management records did not identify any spill kits which were incomplete or missing from locations in and around the project works.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		All clean up material will be appropriately disposed of for ultimate off-site disposal	Not Applicable	Incident management system records did not identify any instances of leaks or spills which resulted in contamination of soil, therefore, the EPS was not triggered.
		No uncontrolled or unregulated release of wastes	Compliant	Incident management system records related to the project did not identify any instances of uncontrolled or unregulated release of wastes.
		All hazardous waste will be stored in designated bunded areas with appropriate spill kit and SDS	Compliant	Area inspections and incident management records during the project did not identify any hazardous waste no being stored appropriately bunded areas, with spill kits and SDS.
		No hazardous waste will be stored within riparian buffer zone as stipulated by DLRM	Compliant	Area inspection and incident management system records during the project did not identify any instances of hazardous waste being stored within riparian buffer zone as stipulated by DLRM
		No unregulated disposal of greywater	Compliant	Incident management system records related to the project did not identify any instances of unregulated disposal of greywater.
		Keep records of the quantities of waste in and out from site as required	Compliant	All waste removed from site is recorded in a register which includes the date of removal, type of waste, whether it is listed, volume of waste, who removed it and its destination.
		Conduct visual inspections of waste receptacles to ensure secure as required	Compliant	Regular area inspections records confirmed that inspections were conducted. No incidents of waste receptacles not having secure lids to prevent fauna access / interference were identified during the project.
5	Minimise adverse impacts on air quality and noise to surrounding receptors, during the CTP upgrade and maintenance activities	Emissions of greenhouse gases and fugitive emissions will be minimised	Compliant	Emissions of greenhouse gases and fugitive emissions are captured and reported in under the National Greenhouse and Energy Reporting Act. Efforts are made on site to minimise emissions where practical such as limiting vehicle journeys.
		Noise complaints will be minimised	Compliant	Incident management system records during the project did not identify any instances of noise complaints. There are no neighbours close to site, but CP as detailed in their stakeholder engagement records proactively engagement with stakeholders and interested parties prior to and during the project.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		All vehicles will be serviced to vehicle manufacture specifications and frequency and registered in accordance with NT motor vehicle registry regulations and workplace health and safety regulations	Compliant	All vehicles used on the project were MRN field vehicles and maintenance records indicated that all vehicles have established preventative maintenance schedules and activities were executed in line with those requirements.
		Keep daily record of the occurrence and volume of gas flared	Not Applicable	No flaring took place under this EMP therefore the EPS was not triggered. Any flaring conducted at MRN during the period of this regulated activity was not related to the project and conducted under the approved MRN FEMP.
		Keep a record of dust suppression activities in the daily reports	Compliant	Daily project reports record the specific activities for the day and events from the previous day, a review identified a couple of instances where dust suppression activities took place.
		Keep a record of complaints from surrounding land users regarding air quality or visual amenity	Not Applicable	No complaints were received regarding air quality and visual amenity therefore the EPS was not triggered.
		Keep records of complaints from surrounding land users regarding noise and vibrations from the activities	Not Applicable	No complaints were received regarding noise and vibration from project activities therefore the EPS was not triggered.
6	Minimise adverse impacts on the environment, people, infrastructure and the surrounding receptors from fire, either from natural causes or as a result of the CTP upgrade and maintenance activities	No open flames or fires outside of designated areas	Compliant	Incident management system / routine inspection records during the project did not identify any project specific instances of open flames or fires outside of designated areas.
		No smoking outside of designated areas	Compliant	Incident management system records during the project did not identify any instances of smoking outside of designated areas.
		Firefighting equipment will be available and serviced as per manufacturer specifications	Partially Compliant	Incident management system records during the project identified one instance where multiple fire extinguishers in the CTP were overdue for inspections. This was identified, rectified and the extinguishers remained compliant for the duration of the project.
		SDS will be available and appropriate firefighting equipment next to all flammable material stores.	Compliant	Copies of SDS are kept for any hazardous material used or stored on site both hardcopies and electronically. Area inspections confirmed that firefighting equipment was available in the CTP where the project activity was taking place.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Staff will be trained in the use of firefighting equipment	Compliant	Training records confirmed that all field-based personnel have received fire extinguisher training.
		Existing and new fire breaks will be maintained to keep at least 4m clear around all infrastructure or at low vegetation cover (<10cm)	Compliant	Area inspections records during the project confirmed that fire breaks were maintained to keep at least 4m clear around all infrastructure. If any remediation was identified work orders were raised and completed.
		No petrol vehicles on site	Compliant	Incident management system records during the project did not identify any instances where petrol vehicles were on site.
		No combustible material will be stored or transported within 25m of the flare pit	Compliant	Area inspections / incident management system records during the project did not identify any instances of combustible material will be stored or transported within 25m of the flare pit.
		Volumes of gas flares will be minimised where possible	Not Applicable	No flaring took place under this EMP therefore the EPS was not triggered. Any flaring conducted at MRN during the period of this regulated activity was not related to the project and conducted under the approved MRN FEMP.
		Gas will undergo complete combustion when flared	Not Applicable	No flaring took place under this EMP therefore the EPS was not triggered. Any flaring conducted at MRN during the period of this regulated activity was not related to the project and conducted under the approved MRN FEMP.
		Conduct at least one fire drill and training during the activities and for this to be recorded	Compliant	Weekly fire alarm testing is conducted and recorded in maintenance connection along with regular emergency exercises. During the project, fire alarm activation occurred on two occasions which resulted in the work area being evacuated and employees and contractors moving to designated muster points.
		Conducting a visual inspection of the designated smoking areas, diesel vehicles only and firefighting equipment on site	Compliant	Inspections records confirmed that checks were undertaken which included designated smoking areas. Checks of firefighting equipment were captured in our maintenance management system. Regular checks of diesel vehicles are undertaken and captured in vehicle pre-start checklists.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Conduct a visual inspection of the site for unauthorised fires	Compliant	Area inspections records did not identify and unauthorised fires. Daily projects reports did not capture unauthorised fires and no incident were captured in our incident management system.
7	Ensure all heritage and culturally significant sites are identified and protected during the CTP upgrade and maintenance activities	No unauthorised third-party access	Compliant	Incident management system records during the project did not identify any instances of unauthorised access to site.
		No unauthorised clearing	Not Applicable	No clearing was required or undertaken during the project, all activities were undertaken within previously cleared areas, therefore, the EPS was not triggered.
		No illicit drugs and alcohol on site	Compliant	A review of incident management system and records of routine testing during the project did not identify any incidents or positive tests.
		No unauthorised firearms on site	Compliant	Incident management records during the project did not identify any unauthorised firearms on site.
		No impact to cultural heritage sites	Compliant	Incident management records during the project did not identify any incidents which impacted cultural heritage sites.
		Traditional owners will be allowed to access the site at any time	Not Applicable	Site access records did not identify any specific non-employee TO visits to site during the project, therefore, the EPS was not triggered.
		All staff will be inducted to the FEMP / EMP	Compliant	MRN site induction records during the project identified that all employees and contractors were inducted prior to or upon arrival at site and before any work commenced. Incident management system records during the project did not identify any employees and contractors who were not inducted. Induction materials include content which deals with heritage and culturally significant sites.
		Keep records of any incidents involving interference with Aboriginal sacred sites, places or objects of archaeological significance	Not Applicable	Incident management records during the project did not identify any incidents which impacted cultural heritage sites therefore, the EPS was not triggered.
EMP Section 10, Table 10-1 Chemical and	Keep a hazardous chemical register which detailed the quantities of hazardous chemicals in and out from site.	Compliant	The details of all hazardous chemicals on site were maintained in a chemical register which details the quantities and location of hazardous chemicals stored on site.	

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	Hazardous Substance Management	Ensuring all hazardous chemicals were stored in either ICBs or in a bunded area in accordance with the MRN FEMP guidelines.	Compliant	Regular area and environmental inspections records confirmed that all hazardous chemicals were stored in either ICBs or in a bunded areas. No incidents of chemicals not being stored correctly were reported in the incident management system records.
		Check that the emergency response and oil spill contingency plans were on site at the start of the activities.	Compliant	Emergency response and oil spill contingency plans were on site at the start of actives and are always stored both electronically and in hard copy on site. Records indicted these plans were reviewed regularly as part of emergency exercises.
		Conduct a visual inspection of the chemical storage area and waste storage areas to check bunding, containment systems and potential spills and leaks of hazardous materials.	Compliant	Inspections of chemical and waste storage areas to check bunding, containment systems and potential spills and leaks of hazardous materials were included in regular areas inspections, quarterly environmental inspections. A review of inspections records and the incident management system records did not identify any incidents of spills and leaks.
		Maintain records of the locations, clean-up undertaken and communication with DPIR regarding any leaks or spills.	Not Applicable	Incident management system records did not identify any instances of leaks or spills which resulted in contamination of soil, therefore, the EPS was not triggered.
	Section 10.5 Auditing	Conduct an internal audit of the activities against the environmental objectives and performance standards upon completion of the activities	Compliant	An audit was undertaken in July 2020 of the regulated activities and assessed against the environmental objectives and performance standards in the EMP.

### 2.3 Mandatory Reporting Requirements

Table 2-2 demonstrates CP’s compliance with the 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, to be provided. Where relevant, CP also confirms that all records, monitoring or required reporting under the Petroleum (Environment) Regulations 2016 (NT) has been provided to DENR or the relevant NTG agency except for the elements highlighted in Table 2-3.

**Table 2-2 Compliance with Mandatory Reporting Requirements**

No	Reference	Requirement	Compliance Status	Evidence
1	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	CP has provided notice to the minister advising the regulated activity has been completed and requesting closure of this EMP based on completed outcomes described in this AEPR.
2	EMP s13 Ongoing 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	MRN stakeholder communications log records indicated CP’s continued engagement with identified stakeholders during and post the project.
3	EMP s 11 Reporting Reg 33	DENR 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.	Not Applicable	CP did not have any reportable incidents as a result of the activities outlined in the EMP.
4	EMP s 11 Reporting Reg 34	Reports on reportable incidents are to be provided to DENR as soon as practicable and within 72 hours of the event occurring. A final report must be provided to DENR within 30 days after remediation/clean-up of the affected area.	Not Applicable	CP did not have any reportable incidents as a result of the activities outlined in the EMP.

No	Reference	Requirement	Compliance Status	Evidence
5	EMP s 11 Reporting Reg 35	A written report of all recordable incidents must be provided to DENR not later than 15 days after the 90-day reporting period (unless otherwise agreed).	Non-Compliant <sup>1</sup>	There were no reportable incidents recorded during the reporting period, however no quarterly recordable incident reports were submitted to DENR within the reporting period for the regulated activity. CP assumed that any incidents could be submitted in reports under the MRN FEMP however we failed to make this statement when submitting the reports for MRN.
6	Reg 37A	A report about flowback fluid from hydraulic fracturing must be provided to the Minister within 6 months of the flowback occurring.	Not Applicable	The regulated activity did not include hydraulic fracturing
7	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.	Not Applicable	The regulated activity did not include hydraulic fracturing
8	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.	Compliant	The Minister was informed indirectly via correspondence with DIPR in October 2018 prior regulated activity commencing under this EMP. The CLC, representing the traditional owners were informed via letter in August 2018.
9	Environment Protection and Biodiversity Conservation Act 1999 s 199, s 214, s 256	If a person who undertakes an activity that results in the unintentional death, injury, trading, taking, keeping or moving of a member of a listed threatened species (except a conservation dependent species), a member of a listed threatened ecological community, all cetacean (whale, dolphin or porpoise) species, a member of a listed migratory species, or a member of a listed marine species in or on a Commonwealth area and the activity was not authorised by a permit, then Secretary of the Department must be notified within 7 days of the person becoming aware of the results of the activity.	Not Applicable	No notification necessary as CP did not have any instances of the activity described.

<sup>1</sup> Central understands that it is DENR's expectation that a report is required every reporting period including periods in which there are no incidents to report. Compliance for this item has been measured against DENR's expectations, irrespective of the requirement to do so.

No	Reference	Requirement	Compliance Status	Evidence
10	National Greenhouse and Energy Reporting Act 2007 s 19 EMP Section 11 Reporting	A registered corporation must report to the Greenhouse and Energy Data Officer relating to the greenhouse gas emissions, energy production and energy consumption from the operation of facilities under the operational control of the corporation and entities that are members of the corporation's group, during the financial year	Compliant	Reporting greenhouse gas emissions including all project related activities was undertaken as per the National Greenhouse and Energy Reporting Act and was submitted in September 2019.
11	Bushfires Management Act 2016 s 90	If the owner or occupier of the land is unable to control a fire on the land, the owner or occupier must take all reasonable steps to notify a fire control officer or fire warden, and the occupier of any land to which the fire is likely to spread or a person apparently over the age of 16 years present on that land	Not Applicable	No notification necessary as CP did not have any uncontrolled fires on site.
12	Environment Protection Act 2019 div 8	Duty to notify the NT EPA as soon as practicable but within 24 hours of any incident which occurs which causes or threatens to cause material or significant environmental harm	Not Applicable	No notification necessary as CP did not have any incidents which caused or threatened to cause material or significant environmental harm as a result of the activities outlined in the EMP.
13	Territory Parks and Wildlife Conservation Act 1976 s 49	The Director may, by notice in writing require the owner or occupier of land in a feral animal control area to undertake measures specified in the notice for the control or eradication of feral animals on the land	Not Applicable	No notice provided by the Minister.
14	Waste Management and Pollution Control Act 1998 s 14	Duty to notify the NT EPA as soon as practicable but within 24 hours of any incident which occurs which causes or threatens to cause pollution resulting in material or significant environmental harm	Not Applicable	No notification necessary as CP did not have any incidents which caused or threatened to cause pollution resulting in material or significant environmental harm as a result of the activities outlined in the EMP.
15	Weeds Management Act 2001 s 29	When given notice by the Minister, land occupiers and landowners have a duty to notify the Minister of the presence of a plant, declared weed or potential weed on the land within the time specified in the notice	Not Applicable	No notice provided by the Minister.

## 3.0 Summary of Compliance

### 3.1 Overview of Compliance

Table 3-1 provides a summary of the results of the compliance assessment against the 111 total compliance items.

**Table 3-1 Compliance Summary**

Compliance Indicator	Number	Percentage
Compliant	72	65%
Partially Compliant	3	3%
Non-Compliant	1	1%
Not Applicable	35	31%

### 3.2 Overview of Items Found Not Compliant or Partially Compliant

The following sections describe:

- The specific compliance requirements not met for the project period
- An analysis of the possible potential environmental harm or impact to environmental values resulting from non-compliance or partially 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 Environmental Performance Standards

Table 3-12 provides a consolidated summary of the two performance standards related to firefighting equipment which were partially compliant during the reporting period.

**Table 3-2 Partially compliant Environmental performance standards**

Description	Potential environmental harm or impact	Corrective actions
During the project weekly site inspections were required to identify any unauthorised off-road driving. Upon review there is no evidence of weekly checks being undertaken, however regular monthly checks were undertaken to detect evidence of unauthorised off-road driving.	Zero environmental harm or impact as: - There were incidents of off-road driving recorded in the incident management system - The project work area is located beside a main access track with easy road access to facilities e.g. camp, workshop and laydown area.	Regular area inspections / checks are managed under the MRN FEMP and are scheduled in our work management system which include identification of any off-road driving.
Contractor engagement process includes the requirement for any vehicles brought to site to have a weed free certificate prior to site mobilisation. CP HSE coordinator confirmed these checks were conducted however the certificates were not located in every instance as evidence.	Zero environmental harm or impact as: - checks were performed and all vehicles were cleared. - recent inspection results and weed surveys undertaken have not identified any newly introduced weeds.	Verification and document storage standards have been implemented and weed free certificates is now being managed under the MRN FEMP.

Description	Potential environmental harm or impact	Corrective actions
Incident management system records identified one instances where multiple fire extinguishers in the CTP were overdue for inspection. This was identified, rectified and the extinguishers remained compliant for the duration of the project.	Zero environmental harm or impact as: - the extinguishers are for emergency use and they were never discharged during the project.	All fire extinguishers in the plant were checked and any overdue for inspection were recertified by an external service provider.  All fire equipment is now scheduled to regular checks in our maintenance management system and managed under the MRN FEMP.

### 3.2.2 Regulatory Reporting

Table 3-13 provides a summary of the regulatory reporting requirements which were partially compliant during the reporting period.

**Table 3-3 Non-Compliant regulatory reporting requirements**

Description	Potential environmental harm or impact	Corrective actions
No specific reports were provided under regulation 35 as CP interrupted that reports were only necessary when a recordable incident took place and any incidents would have been included under the MRN field reports. There were no recordable incidents as a result of the MRN CTP upgrade EMP.	Zero environmental harm or impact as: - This was an administrative requirement	All current CP EMPs as per guidance provided will report recordable or nil incidents as required.  No further action on this EMP, as notice has been sent to the minister requesting closure under regulation 14.

### 3.3 Application of Lessons Learned Across Central Petroleum Onshore Interests

Investigation into the root causes behind the items found to be not compliant for some or all of the reporting period related to:

- Knowledge and understanding on the specific regulatory requirements especially in regard to pre and post project activities.

The key lessons learned and how these have been applied are as follows:

- Continued proactive communication with regulators;
- Developed a more robust process to track compliance and regular reviews to align with EMP commitments and regulatory requirements;
- Align requirements across open EMPs to ensure standards are aligned where possible; and
- Close out EMPs as soon as practical after the work have been completed.