



Annual Environmental Performance Report

Palm Valley Gas Field
Proposed PV-13 Well Site
Environment Management Plan

October 2020

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Operator Details	Central Petroleum Limited, Level 7/369 Ann Street, Brisbane QLD 4000 (ABN: 72 083 254 308)
Approved By	Ross Evans – Chief Operating Officer
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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.	
Signature	
Name	Ross Evans
Position	Chief Operating Officer
Date	23 October 2020

Glossary

Abbreviation / Acronyms	Definition
AAPA	Aboriginal Areas Protection Authority
AEPR	Annual Environment Performance Report
CoP	Code of Practice
CP	Central Petroleum Limited
CTP	Central Treatment Plant
DEPWS	Department of Environment, Parks and Water Security
DAWE	Department of Agriculture, Water and Environment
DIPL	Department of Infrastructure, planning and Logistics
DITT	Department of Industry, Trade and Tourism
EPA	Environment Protection Authority
EPS	Environmental Performance Standard
EcSD	Ecologically sustainable development
EMP	Environment Management Plan
FEMP	Field Environment Management Plan
GIS	Geographic Information System
HSE	Health, Safety and Environment
NEMP	National Environment Management Plan
NLC	Northern Land Council
NORMS	Naturally Occurring Radioactive Materials
NT	Northern Territory
OL3	Operating Licence Three
PV	Palm Valley
PVGF	Palm Valley Gas Field
TO	Traditional Owner

Note: throughout the document references to:

- the Department of Environment and Natural Resources (DENR) have been replaced with the Department of Environment, Parks and Water Security (DEPWS)
- The Department of Primary Industries and Resources (DPIR) have been replaced with the Department of Industry, Trade and Tourism (DITT)

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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 demonstrate the environmental performance of Central Petroleum (CP) as the operator of Palm Valley Gas Field (PVGf) 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 PVGF Proposed PV-13 Well Site Environment Management Plan (EMP) approved 5 July 2018 and any other law in force in the Northern Territory related to the conduct of the regulated activity.

The AEPR covers the period from 5 July 2018 to 4 July 2019, being the 12-month period from the approval date for the EMP. Activity was undertaken at the PVGF within the OL3 permit area.

Activities under this EMP were conducted during the shaded periods shown in Figure 1-1. Outside of the shaded areas the site was managed under the approved PVGF Environmental Management Plan.

Table 1-1 Schedule of activities for PV-13

Activity	2018						2019					
	Jul	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
Pad development	←→											
Camp mobilisation		←→										
Drilling		←→										
Completion				←→								
Camp decommissioning					←→							
Monitoring ¹	←→											
Rehabilitation of drill pad ²												

1.1 Background

The regulated activities conducted under the PVGF Proposed PV-13 Well Site EMP that have been assessed against performance are as follows:

- Clearing of vegetation and PV-13 drill pad development
- Drilling of appraisal well PV-13
- Completion of PV-13 as a production well
- Temporary camp construction and decommissioning
- Rehabilitation of drill pad
- Monitoring

Once completed, PV-13 was tied in to the existing PVGF gathering network under the PVGF PV-13 Connection and PV-02 Reinjection System Upgrade EMP. The PV-13 site / well since being tied in has been managed under the existing PV FEMP.

The location of PV-13 within the PVGF is shown in Figure 1-1. The clearance area for the PV-13 well site is shown in Figure 1-2.

¹ Post drilling the monitoring of the site transitioned to being managed under the PVGF EMP

² As per the EMP, rehabilitation will be managed under the PVGF EMP.

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 PVGF Proposed PV-13 Well Site EMP and therefore is not applicable to the activities in the EMP.

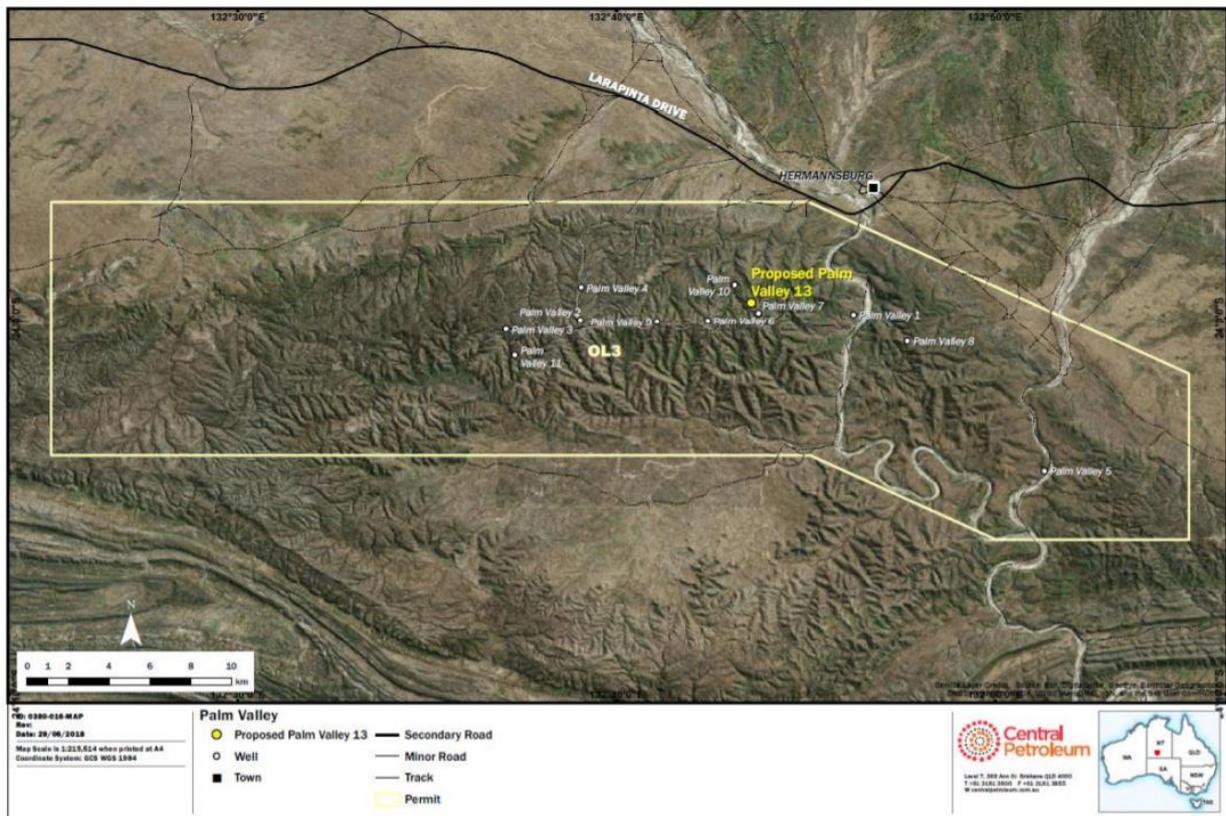


Figure 1-1 Location of PV-13 well site within the PVGF

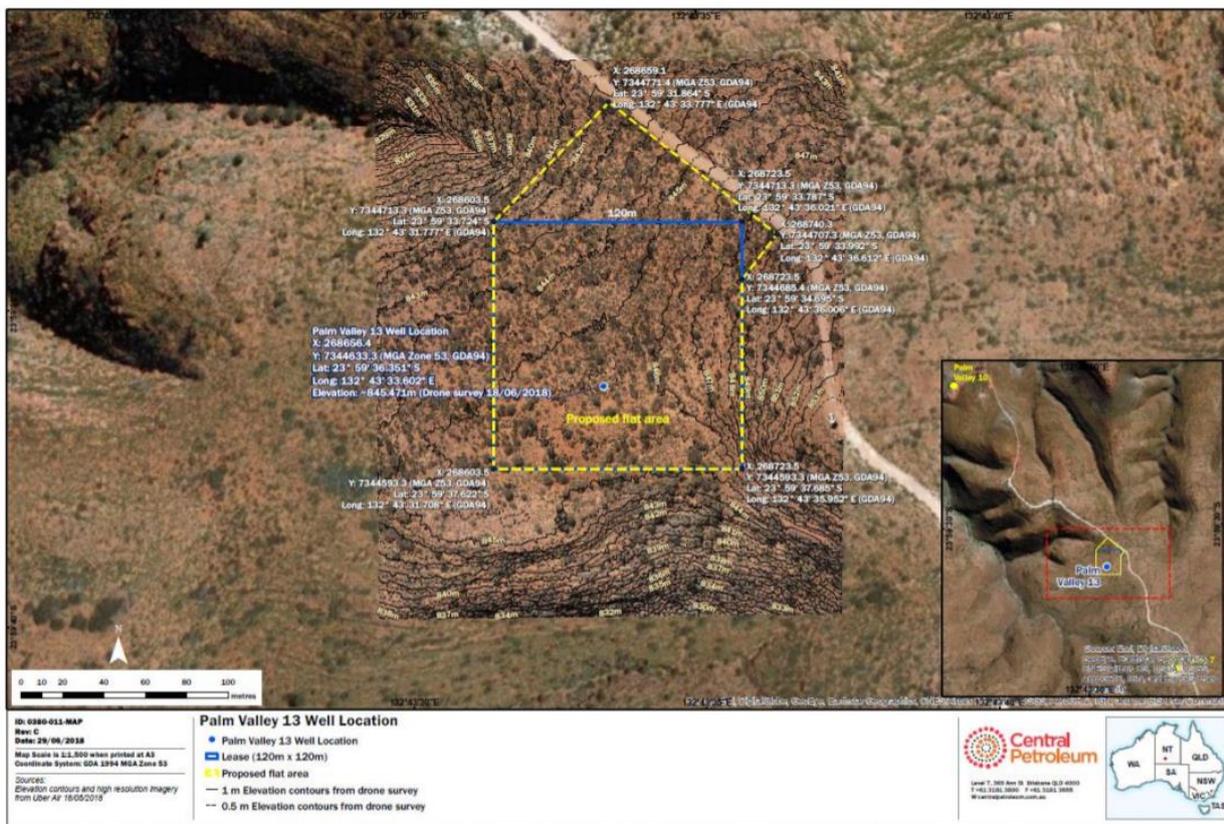


Figure 1-2 PV-13 well site

1.3 Assessment of Compliance

Table 1-2 shows the compliance status indicators used in the AERP.

Table 1-2 Compliance Descriptors

Indicator	Description
Compliant	Compliant with requirement for entire 12-month reporting period
Partially Compliant	Compliant with requirement for most of the year, short periods of non-compliance
Not Compliant	Not compliant with the requirement during the reporting period
Not Applicable	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:
 - PVGF Proposed PV-13 Well Site EMP
 - Our incident management system records
 - Quarterly environmental inspections undertaken at the PVGF
 - September, December 2019 and March, June 2020

- Various project reports
 - Well completion report
 - Area and lease inspection reports
 - Work management and maintenance system records
 - Various PV site-based registers in place including:
 - animal control, waste, hazardous goods, chemical, weed control
2. Reports provided under the National Greenhouse and Energy Reporting Act
 3. Outcome from regulatory inspections conducted by the Department of Environment, Parks and Water Security (DEPWS), Petroleum Operations
 4. Recordable and reportable incident reports submitted to DEPWS Petroleum Operations
 5. Reports provided to DEPWS, the Department of Industry, Tourism and Trade (DITT) and other government agencies.

2.0 Demonstration of Compliance

2.1 Ministerial Approval Conditions

The PVGF Proposed PV-13 Well Site EMP was approved by the Minister for Primary Industry and Resources on 05 July 2018. No approval conditions were applied.

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 PVGF Proposed PV-13 Well Site EMP. The environmental outcomes for the PVGF Proposed PV-13 Well Site EMP (as listed in Table 2-1 below) are sourced from the ‘environmental objectives’ in Section 9-1 of the PVGF Proposed PV-13 Well Site EMP and the environmental performance standards sourced from ‘performance standards’ in Section 15.8, Appendix 8 of the PVGF Proposed PV-13 Well Site EMP.

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

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
1	Prevent a loss of biodiversity because of the activities conducted in the OL3 area through adoptions of EcSD principles and practices	No off-road driving	Compliant	Routine inspection and incident management system records did not identify any incidents involving unauthorised off-road driving during the project.
		No speeding	Compliant	Speed limits on all internal roads are communicated and included as part of the inductions. The incident management system records did not identify any incidents involving speeding during the project.
		No unauthorised night-time driving	Compliant	Incident management system records did not identify any incidents involving unauthorised night-time driving during the project.
		No driving under the influence of alcohol	Compliant	Incident management system records during the project did not identify any instances of employees or contractors driving under the influence of alcohol.
		Zero 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.
		No fauna access to waste	Compliant	Regular inspections did not identify any instances where waste receptacles did not have secure lids to prevent fauna access / interference. Incident management system records during the project did not identify any instances of fauna access to waste.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		No weeds will be present in areas where fill has been used	Not Applicable	No fill was used when constructing PV-13 well pad. All of the material was sourced from the pad location.
		No new infestation of weeds	Compliant	Regular area inspections and incident management system records did not identify any instances of the introduction of or the spread of weeds on site. The annual weed survey undertaken at PV in May 2019 did not identify any increase in declared weeds.
		No spills or lead of hazardous material into surrounding environment	Complaint	Incident management system records and project reports did not identify any instances spills or lead of hazardous material into surrounding environment.
		No unauthorised land clearing	Compliant	Incident management system records during the project did not identify any instances of unauthorised land clearing.
		No unauthorised third-party access	Compliant	Incident management system records during the project did not identify any instances of unauthorised third-party access to the PV-13 site.
		All spills or leaks of hazardous material will be remediated	Not Applicable	No spills or leaks of hazardous materials were recorded. Therefore, the EPS was not triggered.
		Scheduled vehicle maintenance and safety checks	Compliant	The maintenance management system captures all CP controlled vehicles and equipment and their maintenance records e.g. preventative maintenance schedules and executed activities. No overdue maintenance and safety activities were identified.
		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.
		All areas no longer required for safe operation rehabilitated	Not Applicable	The PV13 area is still required for operation activities therefore no rehabilitation was undertaken, and the EPS was not triggered. As outlined in the EMP rehabilitation is being managed under the PVGF EMP.
2	Prevent land degradation	No unauthorised land clearing	Compliant	Incident management system records during the project did not identify any instances of unauthorised land clearing.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	because of activities conducted in OL3 area	Location of topsoil mounds clearly marked and less than 1.5m high	Not Applicable	No topsoil was present on the site. Therefore, the EMPS was not triggered.
		Zero off-road driving	Compliant	Incident management system records did not capture any incidents involving unauthorised off-road driving during the project.
		No unauthorised third-party access	Compliant	Incident management system records during the project did not identify any instances of unauthorised third-party access to the PV-13 site.
		Areas no longer required for safe operation rehabilitated	Not Applicable	The PV13 area is still required for operation activities therefore no rehabilitation was undertaken, and the EPS was not triggered. As outlined in the EMP rehabilitation is being managed under the PVGF EMP.
		All erosion and sedimentation control devices will be compliant with DEPWS and best practice guidelines	Compliant	Area inspections records confirmed that during the project erosion and sedimentation control devices were in place and compliant with DEPWS 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.
		Landform consistent with surrounding environment, no blocking of drainage channels or water courses	Complaint	Project and construction reports indicated that drainage channels and water courses were restored where applicable.
		No new erosion or sedimentation will occur on rehabilitated surfaces after the first significant rainfall	Not Applicable	The PV13 area is still required for operation activities therefore no rehabilitation was undertaken, and the EPS was not triggered. As outlined in the EMP rehabilitation is being managed under the PVGF EMP.
		All staff will be inducted to the EMP	Compliant	PV 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.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
3	To prevent surface and groundwater degradation, contamination or alteration because of activities conducted in the OL3 area by following EcSD principles and practices	Clearing works or disturbance will not affect the long-term stability of existing drainage channels or water courses	Compliant	Incident management system records during and after the project did not identify any instances of clearing works or disturbance which affected the long-term stability of existing drainage channels or water courses.
		No long-term impact to groundwater resources will occur in the area	Compliant	The results of groundwater monitoring activities during and post the project did not identify and impacts to ground water.
		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.
		No waste or hazardous material stored with potential for impact on water courses.	Compliant	Area inspections and incident management records during the project did not identify any hazardous waste not being stored in appropriately bunded areas, with spill kits and SDS.
		No unregulated disposal of grey water	Compliant	Incident management system records related to the project did not identify any instances of unregulated disposal of greywater.
		All staff will be inducted to the EMP	Compliant	PV 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 surface and groundwater.
4	Ensure all waste streams generated in the OL3 area are dealt with and contained; to have minimal impact on the environment	No fauna access to waste	Compliant	Regular inspections did not identify any instances where waste receptacles did not have secure lids to prevent fauna access / interference. Incident management system records during the project did not identify any instances of fauna access to waste.
		All waste will be separated and stored appropriately in accordance with the EMP	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.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Final waste disposal off-site	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.
		Minimise increase in predator species and introduced fauna	Compliant	Animal control register and the incident management system records in use during the project did not identify any instances of predator species and introduced fauna activity being spotted during the project.
		No increase in invasive flora, NT declared weeds or WoNS in waste disposal areas	Complaint	Weeds survey undertaken post project completion at PV did identify some weeds in waste disposal areas, however these were minor and were controlled as part of regular activities.
		No unregulated disposal of NT EPA listed waste	Compliant	Incident management system records related to the project did not identify any instances of uncontrolled or unregulated release of wastes.
		All hazardous waste material will be separated in the appropriate area for disposal according to their SDS, the EMP and the hazardous goods register	Compliant	Area inspections / incident management records did not identify any instances where waste was not being separated and stored in accordance with SDS.
		All waste will be stored in appropriately bunded areas	Compliant	Area inspections and incident management records during the project did not identify any hazardous waste not being stored in 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.
		No waste found outside of designated areas.	Compliant	Area inspections / incident management records did not identify any waste found outside of designated areas.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		No accumulation of waste in vehicles	Compliant	Vehicle pre-start checklist prompt drivers to check to ensure vehicles are clean. A review of available checklists during the project 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 did not identify any clean up materials or spill kits missing from key areas.
		All clean up material will be appropriately disposed of for ultimate off-site disposal	Not Applicable	No spills or leaks of were recorded. Therefore, the EPS was not triggered.
		All spills and/or leaks are remediated as soon as possible	Not Applicable	No spills or leaks of were recorded. Therefore, the EPS was not triggered.
		All spills and leaks are reported to the regulator as required	Not Applicable	No spills or leaks of were recorded. Therefore, the EPS was not triggered.
		No unregulated disposal of wastes	Compliant	Incident management system records related to the project did not identify any instances of unregulated release of wastes.
		All staff will be inducted to the EMP	Compliant	PV 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 waste management.
5	Minimise the adverse effects on air quality and noise to surrounding receptors from the operation in the OL3 area	No open flames or fires outside of designated areas	Compliant	Incident management system and inspection records during the project did not identify any project specific instances of open flames or fires outside of designated areas.
		Smoking restricted to designated areas	Compliant	Incident management system records during the project did not identify any instances of smoking outside of designated areas.
		Emissions of greenhouse gases and fugitive emissions will be minimised	Compliant	Emissions of greenhouse gases and fugitive emissions are captured and reported under the National Greenhouse and Energy Reporting Act. Efforts are made on site to minimise emissions where practical such as limiting vehicle journeys.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Noise complaints will be minimised	Not Applicable	No noise complaints received during the project. Therefore, the EPS was not triggered.
		No decrease in air quality due to increased inefficient vehicle emissions	Compliant	The maintenance management system captures all CP controlled vehicles and equipment and their maintenance records e.g. preventative maintenance schedules and executed activities. No overdue maintenance and safety activities were identified therefore vehicles were operating as designed with no increased emissions due to inefficiencies.
		No decrease in air quality due to fires in the OL3 area	Not Applicable	No fires were recorded in the OL3 area during the project. Therefore, the EPS was not triggered.
		All staff will be inducted to the EMP	Compliant	PV 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 air quality and noise.
6	Minimise the adverse effect on people, infrastructure and the surrounding receptors from fire, either caused by operations in the OL3 area or natural causes	No open flames or fires outside of designated areas	Compliant	Incident management system and 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.
		No combustible material stored around flare pit	Compliant	Incident management system / inspection records during the project did not identify any project specific instances of combustible material stored around the flare pit.
		Spread, intensity and duration of fire to be controlled appropriately	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 where the project activity was taking place.
		Staff will be trained in the use of firefighting equipment	Compliant	Training records confirmed that all CP field-based personnel have received fire extinguisher training.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Existing firebreaks will be maintained	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	Complaint	The amount of flaring during drilling was captured and recorded and flaring only undertaken when necessary.
		Gas will undergo complete combustion when flared	Complaint	Project reports captured gas to flare volume, and the ratio was monitored during drilling and adjusted as required to ensure the efficiency of combustion maintained during flaring activities.
7	Ensure all heritage and culturally significant sites are identified and protected within the OL3 area	No unauthorised third-party access	Compliant	Incident management system records during the project did not identify any instances of unauthorised third-party access to the PV-13 site.
		No unauthorised clearing	Compliant	Incident management system records during the project did not identify any instances of unauthorised land clearing.
		No illicit drugs and alcohol on site	Compliant	Incident management system records during the project did not identify any instances of drug and alcohol on site.
		No unauthorised firearms on site	Compliant	Incident management system 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 EMP	Compliant	PV 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 sacred sites

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Security at fence maintained	Compliant	Area inspections records during the project confirmed that security fencing was in place where required.
		Community consultation with affected stakeholders	Compliant	The PV communications log prior to and during the project demonstrates the engagement with key stakeholders including the CLC, Traditional Owners, Hermannsburg and Alice Springs communities. During the project once concerns were raised, CP acknowledged the communities concerns regarding light impacts to the Hermannsburg resident and endeavoured to provide further information as required.
8	Ensure standards are in place to control well and maintain adequate integrity	Routine testing and well head integrity monitoring will be conducted	Compliant	Routine maintenance activities of and well head integrity was scheduled and executed with the outcomes captured in the maintenance management system.
		Well pressure will be constantly monitored for any drop indicating wellhead failure	Compliant	Continuous monitoring of tubing pressures was captured in our SCADA system with surface and production casing pressures also monitored on a regular basis.
		Well design will be developed using industry best practise	Compliant	The design of the well was aligned with Australian and the American Petroleum Industry Standards. In addition, the design was aligned with the NT schedule for onshore petroleum exploration and production requirements and approved DITT.
		Methods for operation continually updated to meet industry best practice standards	Complaint	The well once drill and completed was handed to PV operations and is being managed in accordance with the PVGF EMP. The well is being continuously monitored and managed in alignment with industry standards.
		Casing will be used to seal off different geological and hydrogeological strata	Compliant	As detailed in the well completion report, casing was used to seal off different geological and hydrogeological strata.
		Well will be sealed within cement plugs as soon as determined a casing failure exists	Not Applicable	No casing failures had been identified. Therefore, the EPS has not been triggered.
		Routine maintenance of flow lines and joints or high stress points will be conducted	Compliant	Routine maintenance activities of infield flow lines were scheduled and executed in line with the PVGF pipeline integrity management plan and outcomes captured in the maintenance management system.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Spill response plan and emergency response plan will be in place	Compliant	A response to a spill is detailed in the PVGF site emergency response plan.
		All staff will be trained and inducted into emergency drills and spill response plans	Compliant	PV 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 emergency situations and spill response.
		Security bond will be held by DITT	Compliant	A bond was lodged with DITT on 5 July 2018.

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 DEPWS 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 s 13 Stakeholder Consultation Schedule 1, Item 9(2)	Interest holders are required to conduct future engagement with stakeholders, in accordance with the description in the EMP.	Compliant	PV stakeholder communications log records indicated CP's continued engagement with identified stakeholders during and post the project.

No	Reference	Requirement	Compliance Status	Evidence
3	EMP s 11 Reporting 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.	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 DEPWS as soon as practicable and within 72 hours of the event occurring. A final report must be provided to DEPWS 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.
5	EMP s 11 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).	Non-Compliant ³	A recordable incident was reported during the period, however, in DITT's view it was reported outside the prescribed timeframes. In addition, no quarterly recordable incident reports for PV were submitted to DEPWS within the reporting period for the regulated activity. CP assumed that any incidents could be submitted in reports under the PVGF EMP however we failed to make this statement when submitting the reports for PV.
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.

³ Central understands that it is DEPWS'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 DEPWS's expectations, irrespective of the requirement to do so.

No	Reference	Requirement	Compliance Status	Evidence
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 multiple emails and face to face meetings with DITT in early to mid 2018 prior regulated activity commencing under this EMP. The CLC, representing the traditional owners were informed of the commencement of activities via email and face to face meetings in early July 2018.
9	EMP s 11.4 Emissions and Discharge Reporting National Greenhouse and Energy Reporting Act 2007 s 19	A registered corporation must provide a 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 that financial year	Compliant	Greenhouse gas emissions at PV including during the project was captured and reported as per the National Greenhouse and Energy Reporting Act. The report was submitted in September 2019.
10	Environment Protection and Biodiversity Conservation Act 1999 (Cth) 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 an 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.

No	Reference	Requirement	Compliance Status	Evidence
11	National Environment Protection (National Pollution Inventory) Measure 1998 (Cth) s 9 Waste Management and Pollution Control Act 2003 (NT)	The occupier of each reporting facility is to be required to provide information to the NPI if a reporting threshold for a substance is exceeded	Not Applicable	No notification necessary as CP did not have any instances of the threshold exceedance during the project.
12	Bushfires Management Act 2016 (NT) 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.
13	Environment Protection Act 2019 (NT) 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.
14	Territory Parks and Wildlife Conservation Act 1976 (NT) s 49	The Director may, by notice in writing require the owner or occupier of land in a feral animal control area to undertake the measures specified in the notice for the control or eradication of feral animals on the land	Not Applicable	No notice provided by the Director.
15	Waste Management and Pollution Control Act 1998 (NT) 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.

No	Reference	Requirement	Compliance Status	Evidence
16	Weeds Management Act 2001 (NT) 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 104 total compliance items.

Table 3-1 Compliance Summary

Compliance Indicator	Number	Percentage
Compliant	78	75%
Partially Compliant	0	0%
Non-Compliant	1	1%
Not Applicable	25	24%

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 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

All performance standards were found to be compliant during the period of the regulated activity.

3.2.2 Regulatory Reporting

Table 3-12 provides a summary of the regulatory reporting requirements which were not compliant during the reporting period.

Table 3-2 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 PV field reports. There was also one recordable incident which was not reported in a timely manner as a result of the proposed PV-13 well 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 requirements reporting requirements.

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

- Continued proactive communication with regulators; and
- Ensure all obligations are clear and scheduled in our work management systems.