

Annual Environmental Performance Report

EMP title	Imperial 2020-21 Drilling Program NT (IMP2-6.1)
Unique EMP ID	IMP 2-6.1
EMP approval date	30 September 2020
AEPR period	1 October 2023 – 30 September 2024
Petroleum title number/s	Exploration Permit (EP) 187

The information to be included in this template may be used by the Minister for Environment, Climate Change and Water Security to assess whether an interest holder is meeting the environmental outcomes, environmental performance standards and obligations and commitments made in an approved Environment Management Plan (EMP).

This form must be completed in accordance with the instruction and guidance provided in the Onshore Petroleum Annual Environmental Performance Reporting Guideline available on the [Onshore Gas website](#).

Document title	Annual Environmental Performance Report
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Version Control (to be completed by interest holder)

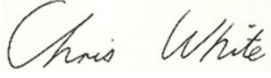
Date	Rev	Reason for Amendment	Author	Checked	Approved
18/10/2024	0	Initial submission to DLPE	SR	RL	CW

Declaration

A person with legal authority to sign on behalf of the interest holder, or all interest holders (if more than one), must sign the declaration.

I hereby declare that I:

- am authorised to make this declaration.
- confirm that, to the best of my knowledge all information provided addresses the relevant matters and is true, correct, complete, and does not contain misleading information.
- am aware that it is an offence under section 107 of the *Petroleum Act 1984* to give an authorised person information that I know, or ought to reasonably know, to be false or misleading in a material manner particular.
- understand that all information supplied as part of this form, including attachments, may be disclosed publically in accordance with section 62A of the *Petroleum Act 1984*, and consistent with the requirements of the Information Privacy Principles (IPPs) in the *Information Act 2002*.

Signature	
Name of person signing on behalf of interest holder/s	Chris White
Position	Chief Operating Officer
Company	Imperial Oil & Gas Pty Limited
Address	L5, 6 O'Connell Street, Sydney NSW 2000

Acronyms / Terms	Definition
AEPR	Annual Environmental Performance Report
Code	Code of Practice: Onshore Petroleum Activities in the Northern Territory
DEPWS	Department of Environment, Parks and Water Security (NT)
DITT	Department of Industry, Tourism and Trade (NT)
DLPE	Department of Lands, Planning and Environment
EMP	Environment Management Plan
EP	Exploration Permit
Interest Holder	Means a person who holds a petroleum interest for a regulated activity.
Minister	Minister for Environment, Climate Change and Water Security
NT	Northern Territory
Operator	Means a person designated as operator under section 16(3)(g) of the <i>Petroleum Act 1984</i>
Regulations	Petroleum (Environment) Regulations 2016 (NT)

Contents

1. Introduction	1
1.1. Sources of information to inform performance	2
1.2. Performance indicators	3
1.3. Evidence used to assess performance	3
2. Demonstration of performance	4
3. Overall performance	21
3.1. Overview of performance	21

Figures

Figure 1-1 Location of the Carpentaria 1 well pad in EP 187	2
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Tables

Table 1: Performance descriptors	3
Table 2: Compliance with Ministerial approval conditions	4
Table 3: Compliance with environmental outcomes and environmental performance standards	7
Table 4: Compliance with mandatory monitoring and reporting requirements	16
Table 5: Performance summary	21

1. Introduction

The Petroleum (Environment) Regulations 2016 (NT) (the Regulations) require an interest holder to provide a report to the Minister for Environment, Climate Change and Water Security (the Minister) on no less than an annual basis that outlines the environmental performance of the interest holder.¹ The report, termed the Annual Environmental Performance Report (AEPR), must include sufficient information to allow the Minister to assess whether the interest holder has met the environmental outcomes and environmental performance standards included in the approved Environment Management Plan (EMP) with reference to information required to be recorded, monitored or reported under the Regulations and any other law in force in the NT related to the conduct of the regulated activity.

Approved Environment Management Plan Details	
EMP title	Imperial 2020-21 Drilling Program NT (IMP2-6.1)
Unique EMP ID	IMP2-6.1
EMP approval date	30 September 2020
AEPR period	1 October 2023 – 30 September 2024
Petroleum title number/s	Exploration Permit (EP) 187
Regulation 22 Notices	
Date Acknowledged	Scope
19/12/2023	Imperial has updated the Emergency Response Plan across all EP 187 activities to a single reference document. One Emergency Response plan (rather than 4 across all the EMPS) ensures information is current and is simple to find and utilise during an emergency.
Regulation 23 Notices	
Date Acknowledged	Scope
-	-
Location of Regulated Activity	
<input checked="" type="checkbox"/>	Figure attached showing location of regulated activity

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

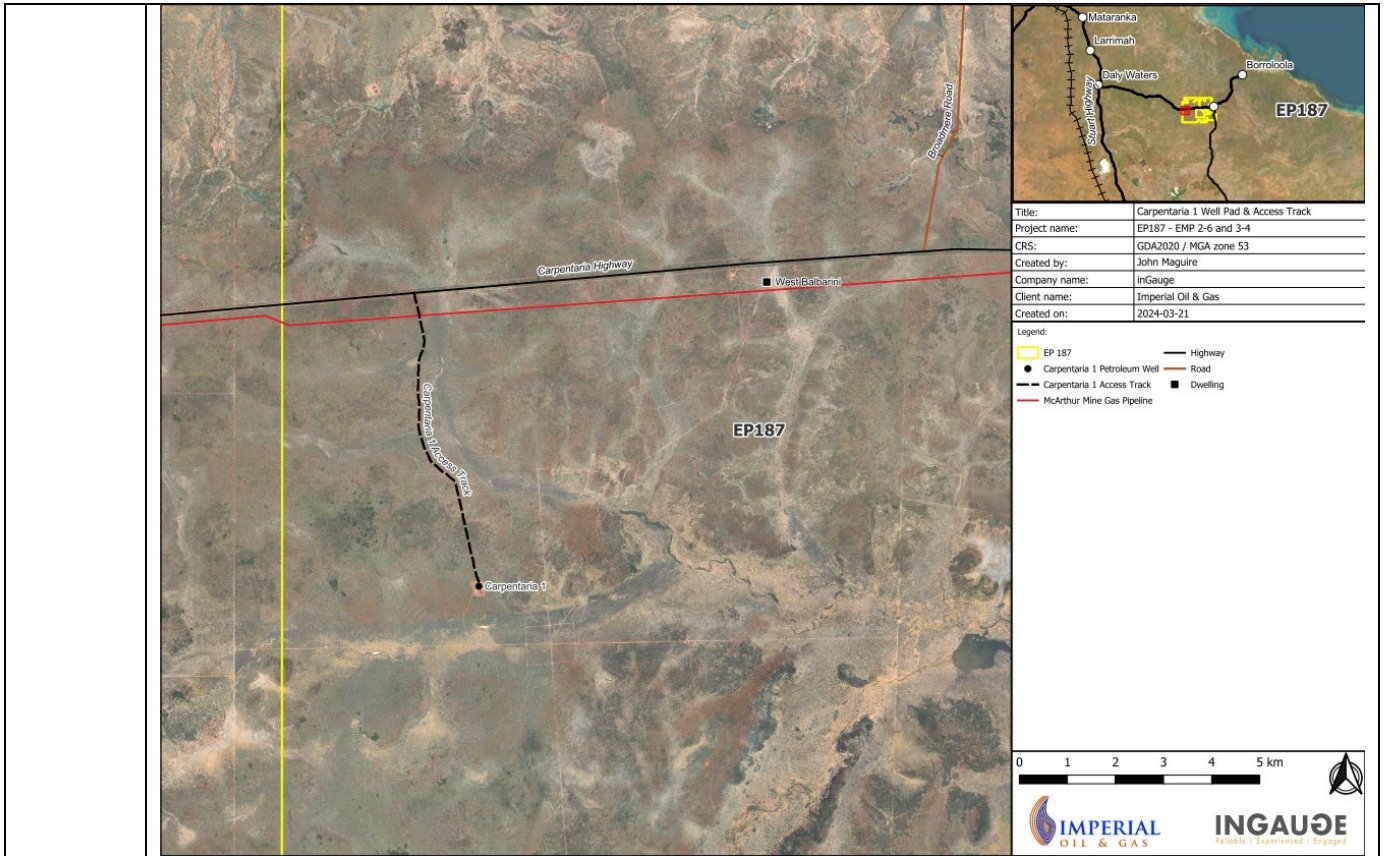


Figure 1-1 Location of the Carpentaria 1 well pad in EP 187

Regulated activities conducted during the reporting period	
-	No regulated activity occurred under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024. Activity at Carpentaria 1 occurred under IMP 3-4.

1.1. Sources of information to inform performance

Information evaluated to inform compliance status (check applicable sources)	
<input checked="" type="checkbox"/>	Compliance with Ministerial approval conditions
<input checked="" type="checkbox"/>	Compliance with each environmental outcome and environmental performance standard within the approved EMP
<input checked="" type="checkbox"/>	Compliance with reporting requirements in accordance with the Code and Regulations
<input checked="" type="checkbox"/>	Recordable and reportable incidents within the reporting period, including root cause analysis and related corrective actions to prevent re-occurrence
<input type="checkbox"/>	Findings of regulatory inspections and audits within the reporting period and related actions to address any findings
Other	

1.2. Performance indicators

Table 1 shows the performance status indicators used in this AEPR.

Table 1: Performance descriptors

Performance Status	Description
Compliant	Compliant with requirement for entire 12 month reporting period
Not Compliant	Interest holder did not comply with the requirement fully or at all during the reporting period
Not Applicable	Requirement not applicable during the reporting period

1.3. Evidence used to assess performance

Please indicate which sources of evidence have been used to demonstrate compliance.

Evidence used to inform compliance status (check applicable evidence)	
<input checked="" type="checkbox"/>	Interest holder self-assessments of compliance, through daily and weekly inspections, as committed to in the EMP
<input checked="" type="checkbox"/>	Interest holder self-assessments of compliance, through internal audits, as committed to in the EMP
<input checked="" type="checkbox"/>	Interest holder self-assessments of compliance, through external audits conducted by third parties
<input type="checkbox"/>	Outcomes of inspections and/or audits conducted by the regulator
<input checked="" type="checkbox"/>	Spill register entries
<input checked="" type="checkbox"/>	Monitoring or other reports provided to DEPWS, the Department of Industry, Tourism and Trade (DITT) and other government agencies as required by the EMP
<input checked="" type="checkbox"/>	Outcomes of monitoring programs
<input checked="" type="checkbox"/>	Measurement criteria identified in the approved EMP
Other	

2. Demonstration of performance

Table 2 demonstrates interest holder compliance with Ministerial EMP approval conditions. Table 2 has been populated to provide examples of information to be included.

Table 2: Compliance with Ministerial approval conditions

No	Ministerial Condition	Compliant	Evidence
1.	<p>Condition 1: Prior to commencement of activities on the Carpentaria-2 well site, the interest holder must provide to the Department of Environment, Parks and Water Security (DEPWS), at least 4 weeks prior to commencement of the regulated activity:</p> <p>i. A detailed map and geo-reference location of the final Carpentaria – 2 well site on EP 187 selected, as referenced in the EMP</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Ministerial Condition not applicable to IMP 2-6.1. Carpentaria 2 well site occurred under the operation of IMP 4-3.
2.	<p>ii. a geotechnical assessment report for the Carpentaria-2 well site, developed by a suitably qualified independent person, that:</p> <ul style="list-style-type: none"> includes results of 60cm soil cores, taken at three sites across the well pad area for analysis of particle size distribution; determines the amount of excavation and quantity of surface material that will be required to be stripped at the well pad to ensure a stable base; determines stockpiling requirements of stripped material; and determines the amount of suitable gravel material required to build the well pad. 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Ministerial Condition not applicable to IMP 2-6.1. Carpentaria 2 well site occurred under the operation of IMP 4-3.

No	Ministerial Condition	Compliant	Evidence
3.	Condition 2: The interest holder must provide to the DEPWS an updated timetable for the regulated activity prior to commencement of the activity and provide an updated timetable to the DEPWS each month following commencement.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No regulated activity occurred under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.
4.	Condition 3: In support of Schedule 1, item 11 of the Regulations and clause A.3.5 of the Code, the interest holder must provide geospatial files of the land disturbance footprint(s) to DEPWS within sixty (60) days of completion of each land clearing activity or within 6 months of approval of this EMP, whichever occurs first.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No land clearing activity occurred as a result of the regulated activity under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.
5.	Condition 4: The interest holder must provide to DEPWS a cementing report for the 13-3/8" and 9 5/8" casing strings as soon as practicable but not more than 14 days after completion of the cementing job for the Carpentaria-1 and Carpentaria-2 wells on EP 187.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No cementing occurred as a result of the regulated activity under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.
6.	Condition 5: The interest holder must provide to DEPWS within six weeks of completion of drilling operations at the Carpentaria-1 well site, a laboratory analysis of drilling wastewater that may be contained in the drilling sump. The laboratory analysis must comply with the Code of Practice: Onshore Petroleum Activities in the Northern Territory, Table C.8: Wastewater chemistry analytes.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No drilling occurred as a result of the regulated activity under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.

No	Ministerial Condition	Compliant	Evidence
7.	Condition 6: In addition to the minimum methane leak detection inspection frequencies required by the Code, the interest holder must undertake methane leak detection within seven (7) days of commission equipment that is in hydrocarbon service and under pressure and record to an auditable standard.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No equipment was commissioned in hydrocarbon service under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.
8.	Condition 7: The interest holder must provide an annual report to DEPWS on its environmental performance, in accordance with item 11(1)(b) in schedule 1 of the Petroleum (Environment) Regulations 2016 (NT). The first report must cover the 12 month period from the date of this approval, and be provided within three calendar months of the end of the reporting period. The annual environmental performance report must align with the template prepared by DEPWS for this purpose and must include a signed declaration by the interest holder or operator.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>This Annual Environment Performance Report has been provided to DEPWS in accordance with item 11(1)(b) in schedule 1 of the Petroleum (Environment) Regulations 2016 (NT). It covers the previous 12-month reporting period from the date of the original approval (30/9) and is provided within three calendar months of the end of the reporting period (due 30/12/annually). The annual environmental performance report aligns with the template prepared by DEPWS for this purpose and includes a signed declaration by the interest holder or operator.</p> <p>Previous IMP 2-6 AEPR for reporting period 1 October 2022- 30 September 2023 was submitted to Onshoregas.depws@nt.gov.au on 12/12/2023.</p>

Table 3 provides a systematic overview of interest holder performance against the environmental outcomes and environmental performance standards within the approved EMP. Table 3 has been populated to provide examples of information to be included.

Table 3: Compliance with environmental outcomes and environmental performance standards

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
1.	Asset Integrity <ul style="list-style-type: none"> Minimise impacts to ecosystem and human health values 	No asset integrity failures	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>No assets were installed under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.</p> <p>Leak Detection monitoring undertaken at Carpentaria 1 wellhead on the:</p> <ul style="list-style-type: none"> 29 December 2023 7 June 2024 <p>No leaks were recorded during the monitoring events.</p> <p>Emergency Response Plan updated on 19 December 2023.</p>
2.		No uncontrolled releases	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>No assets were installed under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.</p> <p>Leak Detection monitoring undertaken at Carpentaria 1 wellhead on the:</p> <ul style="list-style-type: none"> 29 December 2023 7 June 2024 <p>No leaks were recorded during the monitoring events.</p> <p>Emergency Response Plan updated on 19 December 2023.</p>

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
3.	Chemicals and Hazardous Materials <ul style="list-style-type: none"> Minimise impacts to ecosystem and human health values 	No uncontrolled releases of chemicals and hazardous materials	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>No hazardous materials stored under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.</p> <p>Leak Detection monitoring undertaken at Carpentaria 1 wellhead on the:</p> <ul style="list-style-type: none"> 29 December 2023 7 June 2024 <p>No leaks were recorded during the monitoring events.</p> <p>No record of spills under IMP 2-6.1 in the Imperial incident reporting system during the AEPR reporting period of 1 October 2023 – 30 September 2024. No spills occurred.</p>
4.		No incorrect storage and use of chemicals and hazardous materials	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No storage and use of chemicals and hazardous materials under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.
5.	Waste Management <ul style="list-style-type: none"> Minimise impacts on soil, surface water, groundwater, sensitive habitat and air quality 	Absence of domestic waste remaining onsite at completion of activities (i.e. general rubbish, waste chemicals, workshop wastes including oily rags, containers etc)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Activities onsite at Carpentaria 1 well pad being undertaken under IMP 3-4 not IMP 2-6.1.
6.	<ul style="list-style-type: none"> Minimise creation of food sources or habitat for pest species Minimise waste generation through reduce, reuse, 	No unregulated waste handling.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No regulated waste was handled under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
7.	recycle programs	Pest species not encouraged to the site	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Activities onsite at Carpentaria 1 well pad being undertaken under IMP 3-4 not IMP 2-6.1.
8.		All waste certificates to be noted and accounted for	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No regulated waste was handled under IMP 2-6.1 during the AEPR reporting period of 1 st October 2023 to 30 th September 2024.
9.	Erosion and Sediment Control <ul style="list-style-type: none"> Minimise disturbance to land and land use (including soils and terrain, flora and fauna) Minimise erosion (via water or wind) and sediment releases Protection of waterways Return disturbed areas to a stable landform such that they are returned to a condition as close as practicable to the surrounding area (or pre-disturbance state) within an acceptable time frame. Protect the productivity of the land for its intended use 	Land disturbance equal to or less than planned	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No land disturbance occurred under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.
10.		Minimum incidences of erosion and sedimentation occurring	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Erosion monitoring of Carpentaria 1 well pad being undertaken under IMP 3-4 daily checks.
11.		Areas left safe, stable and non polluting	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Activities onsite being undertaken under IMP 3-4. Rehabilitation has not occurred under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.
12.		Commence to rehabilitate disturbed areas within 12 months of decommission	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Decommissioning has not occurred under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024. Project area is active under IMP 3-4.
13.		No new erosion flow paths originated from site	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Erosion monitoring of Carpentaria 1 well pad being undertaken under IMP 3-4 daily checks.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
14.		No flow on effects caused by flooding at Imperial's drilling sites	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No flooding occurred under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.
15.	Decommissioning and Rehabilitation Management <ul style="list-style-type: none"> A safe, stable landform consistent with surrounding land use Rehabilitation of disturbed areas is returned to the original land use and is consistent with the adjacent analogue site 	Successful rehabilitation to a similar condition of surrounding environment	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Rehabilitation has not occurred under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024. Project area is active under IMP 3-4.
16.		No further habitat loss resulting from Imperial's activities	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No regulated activities occurred under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024. Activities onsite being undertaken under IMP 3-4.
17.		Decommissioning of redundant assets	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No redundant assets under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.
18.	Biosecurity Management <ul style="list-style-type: none"> Avoid the introduction of weeds and pest fauna Avoid the spreading of existing weeds and pest fauna 	No introduction or spread of declared weeds and/or pest fauna resulting from Imperial's activities	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Annual IMP 2-6 Weed Report submitted to DEPWS Weed Management Branch via nathan.mills@nt.gov.au on 11 July 2024. The report contains weed survey data, weed treatment completed and mitigation measures undertaken to minimise the introduction or spread of weeds within the project area.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
19.	Biodiversity Management <ul style="list-style-type: none"> Minimise disturbance to flora and fauna Minimise disturbance to sensitive areas 	Monitoring EP 187 area to minimise impacts to fauna habitat and sensitive vegetation	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Monitoring of Carpentaria 1 well pad being undertaken under IMP 3-4 daily checks.
20.		No native fauna impacts (injury or fatality)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	EP 187 Fauna Control Register and Imperial incident reporting system does not include any injuries or fatality of native fauna occurring under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.
21.		No loss of sensitive vegetation resulting from Imperial's activities	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No regulated activities occurred under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024. Activities onsite being undertaken under IMP3-4.
22.	Bushfire prevention <ul style="list-style-type: none"> Minimise the risk of causing bushfires from Imperial's activities Minimise (fire) impacts on environmental habitat and fauna, soil erosion, impacts on stakeholders, impacts on culturally significant sites, public infrastructure and community lands Prevent accidental fire risk and ensure safe storage of chemicals 	Successful fire management will be indicated by having no uncontrolled fires occurring as a result of Imperial's drilling activities	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No incidents of fire are recorded in Imperial's incident reporting system under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024. No drilling or uncontrolled fires occurred.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
23.	Air Quality Protection Measures <ul style="list-style-type: none"> Minimise environmental nuisance due to dust for sensitive receptors resulting from Imperial's activities Minimise greenhouse gas emissions 	No complaints regarding dust/ air quality	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>No complaints on the IMP 2-6 Complaints register regarding dust/air quality during the AEPR reporting period of 1 October 2023 to 30 September 2024.</p> <p>Leak Detection monitoring undertaken at Carpentaria 1 wellhead on the:</p> <ul style="list-style-type: none"> 29 December 2023 7 June 2024 <p>No leaks were recorded during the monitoring events.</p> <p>IMP 2-6 Emissions Report was submitted to onshoregas.DEPWS@nt.gov.au on 19 September 2024. Scope 1 emissions were – 0 tCO₂-e</p>
24.		Amicable resolution of complaints.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No complaints on the IMP 2-6 Complaints register regarding dust/air quality during the AEPR reporting period of 1 October 2023 to 30 September 2024.
25.	Traffic and Transport Management <ul style="list-style-type: none"> Minimise environmental nuisance due to dust for sensitive receptors resulting from Imperial's activities 	An absence of issues raised by the community as indicator for successful communication	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	No complaints on the IMP 2-6 Complaints register during the AEPR reporting period of 1 October 2023 to 30 September 2024.
26.		No unresolved complaints	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	No complaints on the IMP 2-6 Complaints register during the AEPR reporting period of 1 October 2023 to 30 September 2024.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
27.	<ul style="list-style-type: none"> Minimise greenhouse gas emissions 	The community is highly consulted with and all comments provided are assessed and those viable implemented	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Community consultation and stakeholder engagement undertaken under IMP 4-3.
28.		High level of satisfaction by the community	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	No complaints on the IMP 2-6 Complaints register during the AEPR reporting period of 1 October 2023 to 30 September 2024.
29.		No vehicular accidents	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Imperial's incident reporting system contains no reports of vehicular accidents under IMP2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024. No vehicular accidents occurred.
30.	Community Impact Minimisation <ul style="list-style-type: none"> Minimise impacts upon environmental values of the local community Minimise impacts on cultural heritage Minimise safety risks to the public and other third parties Maintain and enhance partnerships with the local community, including using local contractors 	An absence of issues raised by the community as indicator for successful communication	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	No complaints on the IMP 2-6 Complaints register during the AEPR reporting period of 1 October 2023 to 30 September 2024.
31.		No unresolved complaints	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	No complaints on the IMP 2-6 Complaints register during the AEPR reporting period of 1 October 2023 to 30 September 2024.
32.		The community is highly consulted with and all comments provided are assessed and those viable implemented	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Community consultation and stakeholder engagement undertaken under IMP 4-3.
33.		High level of satisfaction by the community	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	No complaints on the IMP 2-6 Complaints register during the AEPR reporting period of 1 October 2023 to 30 September 2024.

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
34.	<ul style="list-style-type: none"> No loss to the aesthetic or enjoyment factor for the community 	No vehicular accidents	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Imperial's incident reporting system contains no reports of vehicular accidents under IMP2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024. No vehicular accidents occurred.
		No off-site release of contamination from road corridors	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Imperial's incident reporting system contains no reports of off-site release under IMP2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024. No contamination occurred.
36.	Cultural Heritage and Sacred Site Preservation <ul style="list-style-type: none"> Avoid disturbance of or damage to Aboriginal or cultural heritage artefacts or Sacred Sites Minimise impacts upon or disruption to activities of Indigenous stakeholders in culturally significant areas Ensure adequate background information and training is provided to employees and contractors working in culturally significant areas. Ensure that the health and safety of exploration 	No incidences of disturbance of archaeological sites or sites of cultural significance	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>No archaeological sites identified under IMP2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.</p> <p>Imperial's incident reporting system contains no reports of disturbance to archaeological sites under IMP2-6.1. No disturbance occurred.</p> <p>EP 187 site inductions include cultural heritage section to ensure site personnel and contractors are aware of reporting requirements.</p>

No	Environmental Outcome	Environmental Performance Standard	Compliant	Evidence
	workers and the community is not compromised through management of cultural and environmental awareness			

Table 4 demonstrates interest holder compliance with reporting requirements in the *Code of Practice: Onshore Petroleum Activities in the Northern Territory* (Code) and interest holder's compliance with reporting and monitoring requirements under the Petroleum (Environment) Regulations 2016 (NT) schedule 1, item 11(2), which requires the EMP to include all information required to be recorded, monitored or reported. Where relevant, Table 4 confirms that all records, monitoring or required reporting under the Petroleum (Environment) Regulations 2016 (NT),² or under a commitment made in the EMP, has been provided to DEPWS or the relevant NTG agency.

Table 4: Compliance with mandatory monitoring and reporting requirements

No	Reference	Requirement	Compliant	Evidence
1.	Code cl A.3.5 EMP section 10.4	Geospatial information depicting areas cleared is to be provided to the Minister.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No areas cleared under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.
2.	Code cl A.3.6 (b) EMP section 7.1 & Appendix 06	Weed management plan developed as part of the EMP must provide for ongoing weed monitoring.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	EMP includes the required commitment for ongoing weed monitoring. Post wet season inspection survey conducted between 29 May and 30 May 2024, report submitted to DEPWS Weed Officer on 11 July 2024.
3.	Code cl A.3.7(a)vi EMP section 7.2 – Appendix 10	The fire management plan must provide for annual fire mapping.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	EMP includes the required commitment for ongoing fire mapping. Annual fire mapping was conducted 8 May 2024. The results of the mapping were stored in the Compliance Register.

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

No	Reference	Requirement	Compliant	Evidence
4.	Code cl A.3.9(c) Code cl A.3.9(e) EMP section 7.3	The rehabilitation plan requires progressive rehabilitation of significantly disturbed land which is required to commence no longer than 12 months following the cessation of activities on the land. It also requires regular maintenance and annual monitoring of rehabilitated areas.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	All areas cleared are still in use, so no progressive rehabilitation or monitoring of rehabilitated areas undertaken
5.	Code cl B.4.13.2(c)	As a minimum, the following must be recorded and reported for each stage (where a stage in this context means all fluids pumped at a particular depth interval): a) total volume of hydraulic fracturing fluid pumped, b) quality of water used (tested for analytes in section C.8 of this Code. Analyses do not need to be repeated if the same water source is used for multiple stages), and c) typical and maximum concentrations of chemicals or other substances used.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No hydraulic fracturing occurred under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.
6.	Code cl B.4.13.2(k)iv EMP section 3.10	Where venting is the only technically feasible option for managing produced gas, the technical considerations preventing the use of the recovered gas must be recorded and included in the operator's annual report.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No venting occurred under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.
7.	Code cl B.4.14.2(c) EMP section 3.6.1	All new barriers or new well operating envelopes must be verified and clearly documented and reported by submission of	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No new barriers or well operating envelopes were established under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.

No	Reference	Requirement	Compliant	Evidence
		an updated well barrier integrity validation (WBIV) report to DITT.		
8.	Code cl B.4.15.2(j) EMP section 3.6.3	Complete and accurate records of the entire decommissioning procedure must be kept, with these records submitted as part of the legislative reporting requirements for the decommissioning of petroleum wells.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No petroleum wells were decommissioned under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.
9.	Code cl C.6.1(d) EMP section 7.5 & Appendix 13	Wastewater tracking documentation must be reported to the Minister at least annually in accordance with the framework (Spill Management Plan and Wastewater Management Plan) outlined in the EMP	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Requirement not applicable to IMP 2-6. Carpentaria 1 Annual Wastewater Report submitted to DEPWS under the operation of IMP 3-4 on 28 February 2024.
10.	Code cl C.7.1(d)ii EMP section 3.9, 7.5 & Appendix 13	Wastewater Management Plan must include a program for monitoring and reporting against the effectiveness of the measures for the mitigation of interaction with wildlife, stock and human receptors with+ wastewater.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	The Wastewater Management Plan of the approved EMP includes the required clause.
11.	Code cl D.5.9.2(c) EMP section 3.10 & Appendix 17	Emissions from exploration, well construction (including during flowback) and workovers must be measured and reports submitted.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	No emissions occurred under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024. 2023-2024 Emissions Report emailed to onshoregas.DEPWS@nt.gov.au 1/09/2024

No	Reference	Requirement	Compliant	Evidence
12.	Code cl D.5.9.3(a) EMP section 3.10 & Appendix 17	Where natural gas is vented or flared at a gas processing or other downstream facility, emissions must be estimated and reported.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No gas processing or other downstream facility occurs under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.
13.	Reg 33 EMP section 5.1	DEPWS must be 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.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No reportable incidents occurred under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.
14.	Reg 34 EMP section 5.1	Reports on reportable incidents must 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/cleanup of the affected area.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No reportable incidents occurred under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.
15.	Reg 35 EMP section 8.2	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).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<i>Recordable incident reports were provided to DEPWS by email as follows:</i> <ul style="list-style-type: none"> • Q4 October – December 2023 submitted to DEPWS on 11 January 2024 • Q1 January – March 2024 submitted to DEPWS on 15 April 2024 • Q2 April – June 2024 submitted to DEPWS on 15 July 2024 • Q3 July– September 2024 submitted to DLPE on 3 October 2024

No	Reference	Requirement	Compliant	Evidence
16.	Reg 37A EMP Appendix 06	A report about flowback fluid from hydraulic fracturing must be provided to the Minister within 6 months of the flowback occurring.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No hydraulic fracturing occurred under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.
17.	Reg 37B EMP Appendix 06	A report about produced water from hydraulic fracturing must be provided to the Minister within 6 months of the produced water being extracted.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No hydraulic fracturing occurred under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.
18.	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 construction, ³ drilling, or seismic surveys.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	No construction, drilling or seismic surveys occurred under IMP 2-6.1 during the AEPR reporting period of 1 October 2023 to 30 September 2024.

³ Note, civil works are also considered 'construction' activities.

3. Overall performance

3.1. Overview of performance

Table 5 provides a summary of the results of the performance assessment.

Table 5: Performance summary

Performance Status	Number	Percentage
Compliant	28	40.6%
Not Compliant	0	0.0%
Not Applicable	41	59.4%

No non compliances during the reporting period of 1 October 2023 – 30 September 2024 under IMP 2-6.1