



# **Annual Environmental Performance Report**

Dingo Gas Field and Surprise Oil Field  
Field Environmental Management Plan

**October 2021**

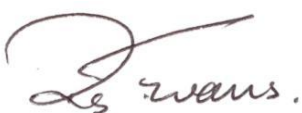
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**Document Control**

Version	Date	Author	Description
1	15 October 2021	Cameron Lambert	Annual submission

**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>	Ross Evans – Chief Operating Officer
<b>Date</b>	15 October 2021

## Glossary

Abbreviation / Acronyms	Definition
<b>AAPA</b>	Aboriginal Areas Protection Authority
<b>AEPR</b>	Annual Environment Performance Report
<b>CLC</b>	Central Land Council
<b>CoP</b>	Code of Practice
<b>CP</b>	Central Petroleum Limited
<b>CTP</b>	Central Treatment Plant
<b>CLC</b>	Central Land Council
<b>DEPWS</b>	Department of Environment, Parks and Water Security
<b>DITT</b>	Department Industry, Tourism and Trade
<b>DGF</b>	Dingo Gas Field
<b>EMP</b>	Environmental Management Plan
<b>EPA</b>	Environment Protection Authority
<b>EPS</b>	Environmental Performance Standard
<b>ESS</b>	Eastern Satellite Station
<b>FEMP</b>	Field Environment Management Plan
<b>GIS</b>	Geographic Information System
<b>HSE</b>	Health, Safety and Environment
<b>NEMP</b>	National Environment Management Plan
<b>NORMS</b>	Naturally Occurring Radioactive Materials
<b>NPI</b>	National Pollution Inventory
<b>NT</b>	Northern Territory
<b>L6</b>	Operating Licence Six
<b>L7</b>	Operating Licence Seven
<b>PL2</b>	Pipeline Licence Two
<b>SOF</b>	Surprise Oil Field
<b>TO</b>	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)
- Department of Primary Industries and Resources (DITT) 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 the Dingo Gas Field (DGF) and Surprise Oil Field (SOF) 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 DGF/SOF Field Environmental Management Plan (FEMP) approved 3 July 2020 and any other law in force in the Northern Territory related to conduct of the regulated activity.

The AEPR covers the period from 3 July 2020 to 2 July 2021, being the first 12-month period subsequent to the approval date for the FEMP listed above. Activity was undertaken at the Dingo Gas Field (DGF) continuously during the reporting period. The Surprise Oil Field (SOF) remained suspended for the duration of the reporting period.

### 1.1 Background

The regulated activities<sup>1</sup> conducted under the FEMP that have been assessed against performance are as follows:

#### Dingo

- Civil maintenance including road, tracks, well lease pads, gas flowline right of ways and lease maintenance
- Well management including shutdown and operational maintenance, function testing, workover, suspension and decommissioning
- Storage, handling and transportation of chemicals, dangerous goods, hazardous materials and substances
- Waste management
- Environmental monitoring
- Weed management and control
- Rehabilitation activities.

#### Surprise

- Civil maintenance including road, tracks, well lease pads, gas flowline right of ways and lease maintenance
- Well management including shutdown and operational maintenance, function testing, decommissioning
- Storage, handling and transportation of chemicals, dangerous goods, hazardous materials and substances
- Groundwater extraction
- Waste management
- Environmental monitoring
- Weed management and control
- Rehabilitation activities.

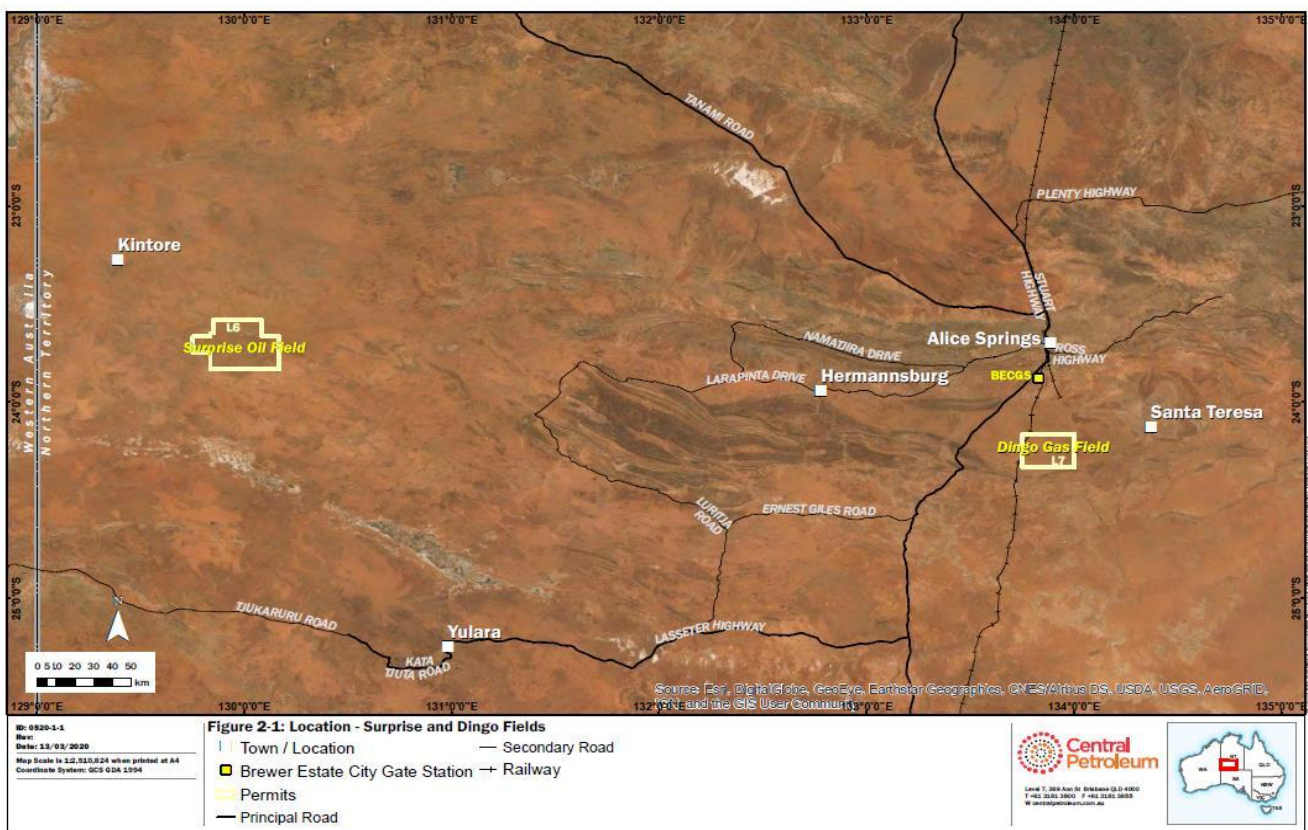
Drilling, hydraulic fracturing, seismic or clearing activities are out-of-scope of the FEMP and were not conducted under this FEMP during the reporting period.

The location of both the Dingo and Surprise fields is shown in Figure 1-1.

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<sup>1</sup> As detailed in Scope section of the approved Dingo Gas Field and Surprise Oil Field, Field Environmental Management Plan

Figure 1-1 Dingo Gas Field and Surprise Oil Field Locations



## 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

## 1.3 Assessment of Compliance

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

**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 year, short periods of non-compliance
<b>Not Compliant</b>	Interest holder did not comply 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 FEMP
  - Our incident management system records
  - Quarterly environmental inspections
    - October and December 2020, as well as March, June and September 2021
  - Area and lease inspection reports
  - Work management and maintenance system records
  - Daily production reports
  - Various registers in place including:
    - animal control, waste, hazardous goods, chemical, weed control
2. Reports provided under the *National Greenhouse and Energy Reporting Act 2007*
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 DITT, the Department of Industry, Trade and Tourism (DITT) and other government agencies.

## 2.0 Demonstration of Compliance

### 2.1 Ministerial Approval Conditions

The FEMP was approved by the Minister for Environment and Natural Resources on 3 July 2020 with conditions, which are assessed for compliance in Table 2-1.

**Table 2-1 Compliance with Ministerial EMP Approval Conditions**

No	Ministerial Condition	Compliance Status	Evidence
1	The Interest Holder must submit to DEPWS, an updated timetable for the regulated activities prior to the commencement of the activity and provide an updated timetable to DEPWS each quarter thereafter. The timetable must include dates for the implementation of commitments and associated hold points, and progressive rehabilitation activities, including proposed dates for commencement of rehabilitation at each of the Dingo Gas Field and the Surprise Oil Field.	Compliant	Quarterly reports of regulated activities undertaken in the previous quarter as well as forecast over the coming quarter were developed and submitted. Reports were provided to DEPWS for the following quarters: <ul style="list-style-type: none"> <li>Jul to Sep 20</li> <li>Oct to Dec 20</li> <li>Jan to Mar 21</li> <li>Apr to Jun 21</li> </ul>
2	The Interest Holder must submit to DEPWS within three calendar months of the date of this approval, a site-specific Erosion and Sediment Control Plan for each of Dingo Gas Field and Surprise Oil Field, to guide civil maintenance activities and detail corrective actions.	Compliant	Site-specific Erosion and Sediment Control Plans for both the DGF and SOF were developed and submitted. DEPWS subsequently issued a letter confirming that the assessed plans meet the requirements of the ministerial condition.
3	The Interest Holder must submit to DEPWS within one month of the date of this approval a groundwater monitoring plan to demonstrate there is no change in groundwater quality as a result of activities at Dingo Gas Field and Surprise Oil Field. The groundwater monitoring plan must include: <ol style="list-style-type: none"> <li>a location map (and associated spatial files) for proposed monitoring bores relative to the respective field</li> <li>a commitment to commence groundwater monitoring within six months of the date of EMP approval</li> <li>a commitment to monitor for the range of analytes specified in clause B.4.17.1 Table 6 of the Code</li> </ol>	Compliant	Site-specific groundwater plans for both the DGF and SOF were developed and submitted to DEPWS. The final plans included: <ul style="list-style-type: none"> <li>a location map of the monitoring bores relative to the respective field</li> <li>a commitment to commence and undertake groundwater monitoring<sup>2</sup></li> <li>monitoring in accordance with the CoP</li> <li>a commitment to develop site-specific performance standards for groundwater quality once baseline water quality data was determined.</li> <li>a commitment to provide groundwater monitoring reports and data to DEPWS annually.</li> </ul>

<sup>2</sup> The first monitoring event was delayed to May 2021 due to COVID related border restrictions.



No	Ministerial Condition	Compliance Status	Evidence
	iv. development of site-specific performance standards for groundwater quality v. a commitment to provide groundwater monitoring reports and data to DEPWS annually. 2		
4	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 Regulations. 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.	Compliant	This reports fulfils the requirement of the Annual Environmental Performance Report (AEPR). An extension was approved by DEPWS and the report was submitted within the agreed timeframe.
5	The Interest Holder must not undertake vegetation clearing outside of the current disturbed footprint and any proposed clearing activities outside of the current disturbance footprint must be presented with geospatial data, at least one month prior to proposed commencement, to DEPWS Petroleum Operations for consideration under the Regulations.	Not Applicable	No clearing was undertaken during the reporting period.

## 2.2 Environmental Outcomes and Environmental Performance Standards

Table 2-2 provides a systematic overview of CP's compliance with the environmental outcomes and environmental performance standards within the approved FEMP. The environmental outcomes for the FEMP (as listed in Table 2-2 below) are sourced from the environmental performance standards sourced from 'environmental outcomes' in Tables 8-2 to 8-7 of the FEMP.

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

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
1	CP's activities do not impact on the viability of local conservation significant fauna / flora populations	Driving only to occur within infrastructure areas	Compliant	Incident management system did not identify any instances of driving outside of infrastructure areas during the reporting period.
		Avoid driving on access tracks within the DGF or SOF after sunset or before sunrise without approval by CP Management	Complaint	Incident management system did not identify any instances of unauthorised dawn or dusk driving. Also, Journey Management System (JMS) records didn't identify any approved non-daylight hours driving.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Speed limited on access tracks within the DGF and SOF to 60km/hr	Compliant	Incident management system did not identify any instances of vehicles speeding. Speed limits are posted and included in site traffic management plans.
		All personnel attending the DGF and SOF will be inducted on speed limits and times to avoid driving	Compliant	Site induction records identified that all employees and contractors were inducted prior to or upon arrival at site. Incident management system records did not identify any employees and contractors who were not inducted. Induction materials outline speed limits and times to avoid driving.
		All vehicles, equipment and machinery from known weed infested areas are to be cleaned and inspected for weeds prior to attending either the DGF or SOF	Not Applicable	No equipment was mobilised to sites from known weed infested areas, therefore the Environmental Performance Standard (EPS) was not triggered.
		Clearing for maintenance activities is only to occur in previously disturbed areas or areas that do not contain significant flora or is habitat for significant fauna	Not Applicable	No clearing was undertaken during the reporting period, therefore the EPS was not triggered.
		Weed Management Plan implemented	Compliant	The weed management plan has been implemented and reports provided to DEPWS in January 2021.
		Evaporation pond is located within the fenced compound	Compliant	Regular environmental inspections confirmed that the evaporation pond was located inside the fenced compound at the SOF.
2	CP's activities: <ul style="list-style-type: none"> <li>Avoid and control soil erosion / sedimentation</li> <li>Maintain the viability of soil through preventing contamination</li> </ul>	Requirement for erosion and sediment control devices (e.g. berms, sediment fences) is determined during site audits. Where determined from the audit that they are necessary they will be in line with best practice guidelines by DEPWS and IECA	Compliant	Area and environmental inspection records confirmed that erosion and sedimentation control devices were in place and compliant with DEPWS and IECA best practice guidelines. Incident management system records did identify some instances of erosion which were remediated and closed out in our maintenance system.
		Avoid driving on access tracks for 24 hours following significant rainfall events (i.e. >10mm in 24 hours)	Compliant	Daily toolbox meeting records across the year captured rain events and instructions to all personnel regarding driving conditions and roads and tracks to avoid.
		Site inspections to be undertaken quarterly and within 5 business days of a significant rainfall event to assess erosion / sedimentation issues	Compliant	Quarterly environmental and weekly operator inspections and were undertaken and any instances of erosions and sedimentation issues were captured. For any identified remediation necessary work orders were raised and completed in the maintenance system.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Conduct Job Hazard Analysis for any new task or new use of equipment to ensure appropriate control measures are identified	Compliant	Maintenance and permit to work records identified that all new tasks were supported by a job hazard analysis undertaken in planning the job. The analysis includes details of the controls to be implemented to perform the job safely.
		Driving only to occur within infrastructure areas.	Compliant	Incident management system did not identify any instances of driving outside of infrastructure areas during the reporting period.
		Portable spill containment equipment (e.g. spill trays) to be available at each of the sites	Compliant	Quarterly environmental inspections confirmed that spill containment equipment (e.g. spill trays) were available at each site.
		Minimal volumes of fuels, oils and other chemicals to be stored on site while the site is not operational	Compliant	Quarterly environmental inspections confirmed that only minimal volumes of fuels, oils and other chemicals were being stored.
		Ensure appropriate measures are in place (e.g. lining, bunding) to prevent fluids or other waste chemical and/or hydrocarbon fluids from contaminating land	Compliant	Quarterly environmental inspections confirmed that all chemical and hazardous substances stored on site were in accordance with safety data sheet guidance to avoid any potential land contamination.
		Weekly inspections to be undertaken of facilities and equipment for leaks/spills. Where leaks and spills are identified, corrective actions are raised, and repairs are undertaken in a timeframe commensurate with the risk of environmental harm escalating if not repaired	Compliant	Weekly area inspections were undertaken at DGF of all facilities and equipment. With quarterly inspections undertaken at SOF as the facility is not operational. If any remediation was identified work orders were raised and completed.
		Implement fuel and chemical handling and storage procedure	Compliant	Quarterly environmental inspections confirmed that only minimal volumes of fuels and other chemicals were being stored. However for those stored, procedures are in place
		Risk assessment of road conditions for heavy vehicle transport will be conducted prior to mobilisation on unsealed roads using detailed weather forecasting	Not Applicable	No heavy vehicles / equipment mobilised to site, therefore the EPS was not triggered.
		Provide spill response kits appropriate for the types of spills possible at each facility	Compliant	Quarterly environmental inspections confirmed that spill containment equipment (e.g. spill trays/spill kits) were available at each site.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Follow the appropriate Australian Standards and Code of Practice for the fuel / chemical being stored and used at the facility	Compliant	Quarterly environmental inspections confirmed that all chemical and hazardous substances stored on site were in accordance with Australian standards and guidance provided in safety data sheets.
		On-site SDS and handling procedures for fuel / chemicals to be available at each facility	Compliant	Quarterly environmental inspections confirmed that all chemical and hazardous substances stored on site had safety data sheet available.
		Pumps, tanks and transfer lines are to be located within suitably bunded areas (not applicable to temporary infrastructure)	Complaint	Regular environmental / area inspection and incident management system records did not identify any pumps, tanks and transfer lines, etc outside of bunded areas.
		Minimum 500mm freeboard to be available within the evaporation pond	Compliant	Daily production records and information captured in the quarterly environmental inspections confirmed that a minimum 500mm freeboard was available throughout the reporting period.
		Pond level to be inspected each quarter and after significant rainfall event. Where the freeboard is less than 500mm, it is to be reduced by offsite transportation and disposal by a licensed waste transporter	Compliant	Quarterly environmental inspections confirmed that there was a minimum 500mm freeboard maintained in the evaporation ponds. There was no need to remove excess water during the year.
		Wastes stored in secured containers, with liquid wastes stored in a bunded area	Compliant	Regular environmental / area inspections as well as incident management system records did not identify any waste being stored in unsecured containers or non-bunded areas.
		All personnel attending the DGF and SOF will be inducted on speed limits, times to avoid driving, correct waste storage, segregation, and disposal	Compliant	Site induction records identified that all employees and contractors were inducted prior to or upon arrival at site. Incident management system records did not identify any employees and contractors who were not inducted. Induction materials outline speed limits and times to avoid driving.
		Removal of listed wastes for off-site disposal to be via an NT EPA approved contractor	Complaint	All waste removed from site and disposed of was recorded in the 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 being disposed not accordance with the NT EPA requirements.
3	Avoid the discharge of sediment or	Requirement for erosion and sediment control devices (e.g. berms, sediment fences) is determined during site audits.	Compliant	Area and environmental inspection records confirmed that erosion and sedimentation control devices were in place and compliant with DEPWS and IECA best practice guidelines. Incident management

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	contaminated surface water into waterways	Where determined from the audit that they are necessary they will be in line with best practice guidelines by DEPWS and IECA		system records did identify some instances of erosion which were remediated and closed out in our maintenance system.
		Conduct Job Hazard Analysis for any new task or new use of equipment to ensure appropriate control measures are identified	Compliant	Maintenance and permit to work records identified that all new tasks were supported by a job hazard analysis undertaken in planning the job. The analysis includes details of the controls to be implemented to perform the job safely.
		Site inspections to be undertaken quarterly and within 5 business days of a significant rainfall event to assess erosion / sedimentation issues	Compliant	Quarterly environmental and weekly operator inspections and were undertaken and any instances of erosions and sedimentation issues were captured. For any identified remediation necessary work orders were raised and completed in the maintenance system.
		Final constructed surface of infrastructure is above 1 in 100-year flooding events	Not Applicable	No new infrastructure was constructed during the reporting period. Therefore the EPS was not triggered.
		If water is required from a local groundwater bore approvals will be obtained	Not Applicable	No water was taken from local groundwater bores, therefore the EPS was not triggered.
		Ensure appropriate measures are in place (e.g. lining, bunding) to prevent fluids or other waste chemical and/or hydrocarbon fluids from contaminating water	Compliant	Quarterly environmental inspections confirmed that all chemical and hazardous substances stored on site were in accordance with safety data sheet guidance to avoid any potential water contamination.
		Weekly inspections to be undertaken of facilities and equipment for leaks/spills. Where leaks and spills are identified, corrective actions are raised, and repairs are undertaken in a timeframe commensurate with the risk of environmental harm escalating if not repaired	Compliant	Weekly area inspections were undertaken at DGF of all facilities and equipment. With quarterly inspections undertaken at SOF as the facility is not operational. If any remediation was identified work orders were raised and completed.
		Monitor facility pressure for quick identification of any source of leak or rupture	Compliant	Wellhead and pipeline pressures were monitored in real time through our production management system. In addition, regular lease reviews were undertaken. These reviews are scheduled, and the outcome recorded in our maintenance management system.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Well inspections to include tubing and annulus pressures checks and evidence of communication	Compliant	Well inspections undertaken on a risk basis during the reporting period include tubing and annulus pressures checks to identify any evidence of potential communication. Area inspection records did not identify any evidence of communication.
		Install, maintain, and routinely test BOPs and related well control equipment on all workover rigs	Not Applicable	No workovers were undertaken during the year, therefore the EPS was not triggered.
		Well to be managed in accordance with a Well Operation Management Plan (WOMP)	Compliant	All wells are being managed in accordance with the current well management plans. Updated WOMPs have been submitted to DITT however are yet to be approved.
		Wastes stored in secured containers, with liquid wastes stored in a bunded area	Compliant	Regular environmental / area inspections as well as incident management system records did not identify any waste being stored in unsecured containers or non-bunded areas.
		Waste storage bunded area not located in a flood prone area	Compliant	Regular area / quarterly environmental inspections records confirmed that waste was stored appropriately in bunds. Also waste storage areas are not located in areas which were potentially flood prone.
		Provide spill response kits appropriate for the types of spills possible at each facility	Compliant	Quarterly environmental inspections confirmed that spill containment equipment (e.g. spill trays) were available at each site.
		Follow the appropriate Australian Standards and Code of Practice for the fuel / chemical being stored and used at the facility	Compliant	Quarterly environmental inspections confirmed that all chemical and hazardous substances stored on site were in accordance with Australian standards and guidance provided in safety data sheets.
		Minimum 500mm freeboard to be available within the evaporation pond	Compliant	Daily production records and information captured in the quarterly environmental inspections confirmed that a minimum 500mm freeboard was available throughout the reporting period.
		Pond level to be inspected each quarter and after significant rainfall event. Where the freeboard is less than 500mm, it is to be reduced by offsite transportation and disposal by a licensed waste transporter	Compliant	Quarterly environmental inspections confirmed that there was a minimum 500mm freeboard maintained in the evaporation ponds. There was no need to remove excess water during the year.
		Minimal volumes of fuels, oils, and other chemicals to be stored on site while the site is not operational	Compliant	Quarterly environmental inspections confirmed that only minimal volumes of fuels, oils and other chemicals were being stored.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Wastes stored in secured containers, with liquid wastes stored in a bunded area	Compliant	Regular environmental / area inspections as well as incident management system records did not identify any waste being stored in unsecured containers or non-bunded areas.
		Pumps, tanks, and transfer lines are to be located within suitably bunded areas (not applicable to temporary infrastructure)	Compliant	Regular environmental / area inspections and incident management system records did not identify any pumps, tanks and transfer lines, etc outside of bunded areas.
4	CP's activities do not create a measurable decrease in air quality at sensitive receptors through: <ul style="list-style-type: none"> <li>Dust generation</li> <li>Emissions (gas leaks)</li> </ul>	Implement dust control measures where appropriate including water trucks	Not Applicable	No instances during the reporting period where dust control measures were needed. Therefore the EPS was not triggered.
		Vegetation in no-use area to be left undisturbed	Compliant	No activities were undertaken outside of disturbed areas, hence vegetation was left undisturbed.
		Outside of firebreak areas, Low ground cover (<10cm) to be maintained on low traffic areas and around well heads to maintain fire safety while minimising dust.	Compliant	Area inspections records 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.
		Speed limited on access tracks within the DGF and SOF to 60km/hr	Compliant	Incident management system did not identify any instances of vehicles speeding. Speed limits are posted and included in site traffic management plans.
		Use of non-intrinsically safe material only allowed inside the facilities if accompanied by a gas detector and the appropriate permit	Compliant	Maintenance and permit to work records identified that only intrinsically safe material was used in the facilities. All work was supported by a job hazard analysis undertaken when planning the job. The analysis included details of the controls to be implemented to perform the job safely in these cases it included the use of gas detectors.
		Monitor facility pressure for quick identification of any source of leak or rupture	Compliant	Wellhead and pipeline pressures were monitored in real time through our production management system. In addition, regular lease reviews were undertaken. These reviews are scheduled, and the outcome recorded in our maintenance management system.
		Well inspections to include tubing and annulus pressures checks and evidence of communication	Compliant	Well inspections undertaken on a risk basis during the reporting period include tubing and annulus pressures checks to identify any evidence of potential communication. Area inspection records did not identify any evidence of communication.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Install, maintain, and routinely test BOPs and related well control equipment on all workover rigs	Not Applicable	No workovers were undertaken during the year, therefore the EPS was not triggered.
		Well to be managed in accordance with a Well Operation Management Plan	Compliant	All wells are being managed in accordance with the current well management plans. Updated WOMPs have been submitted to DITT however are yet to be approved.
		Weekly inspections to be undertaken of facilities and equipment for leaks/spills. Where leaks and spills are identified, corrective actions are raised, and repairs are undertaken in a timeframe commensurate with the risk of environmental harm escalating if not repaired	Compliant	Weekly area inspections were undertaken at Dingo of all facilities and equipment. With quarterly inspections undertaken at Surprise as the facility is not operational. If any remediation was identified work orders were raised and completed.
5	CP's activities are not the cause of fires in the region	4m fire breaks maintained around fixed surface assets	Compliant	Area inspections records 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.
		Only diesel is to be stored onsite	Compliant	Quarterly environmental inspections confirmed that only diesel was being stored onsite.
		Smoking is only permitted in designated smoking areas	Compliant	Incident management system records did not identify any instances of smoking outside of designated areas.
		Conduct Job Hazard Analysis for any new task or new use of equipment to ensure appropriate control measures are identified and to take account of variation in fire danger ratings	Compliant	Maintenance and permit to work records identified that all new tasks were supported by a job hazard analysis undertaken in planning the job. The analysis includes details of the controls to be implemented to perform the job safely.
		When attending a site conduct daily toolbox meetings with on-site personnel regarding current fire danger, presence of fire in the area and current vegetation condition	Compliant	Fire awareness and preparedness is covered as part of toolbox meetings and as part of the induction. Vegetation condition is noted as part of regular inspections.



No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Inductions to include information on the designated smoking areas, fire extinguisher locations and emergency response plan	Compliant	Induction provides information to support the emergency response plan, including fire safety.
		Fire extinguisher to be available in any vehicle which visits the DGF or SOF	Compliant	Fire extinguishers are standard safety equipment in all CP vehicles. Prestart checklists require fire extinguishers to be present and checked before each journey.
		Hazardous zones for each well determined in accordance with the relevant Australian Standard	Compliant	Area / lease inspections records confirmed that all hazardous areas were clearly identified using signage and require specific conditions prior to entry. All hazardous areas are aligned with Australian standards.
		Only equipment authorised within the hazardous zone is used whilst on site	Compliant	Job hazard analysis and permit to work orders have been reviewed to ensure only authorised equipment is used in hazardous areas.
6	CP's activities avoid disturbance to or damage heritage artefacts, sacred sites, or non-indigenous heritage sites	All activities undertaken in accordance with the conditions of the relevant AAPA certificate.	Compliant	A review of AAPA certificate conditions identified that there were no activities undertaken outside of the agree scope of works.
		Site inductions to include information on location of known cultural and heritage sites and process for unexpected finds	Compliant	Site induction records identified that all employees and contractors were inducted prior to or upon arrival at site. Incident management system records did not identify any employees and contractors who were not inducted. Induction materials include information on cultural and heritage sites and process for unexpected finds.
		Where known cultural heritage sites are within 50m of maintenance earthworks, the site will be delineated with bunting or similar	Not Applicable	No maintenance works were undertaken within 50m of a cultural heritage site. There the EPS was not triggered.
		No earthworks to be conducted after sunset or before sunrise	Not Applicable	A review of the permit to work records did not identify any civil works undertaken outside of daylight hours. Therefore the EPS was not triggered.
		Journey management plan approved by CP	Compliant	Journey management records for the period confirmed that all applicable journeys were planned and approved prior to commencement.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Personnel access to the facility and any site/area by permit approved by the CLC and CP	Compliant	A review of site access records confirmed all personnel attending site were included under the CLC permit. Site induction records identified that all employees and contractors were inducted prior to or upon arrival at site. Incident management system records did not identify any employees and contractors who were not inducted.
7	CP's activities do not negatively impact on: <ul style="list-style-type: none"> <li>▪ Capacity of road infrastructure up to and within the DGF / SOF</li> <li>▪ Community relationships</li> <li>▪ Safety risks to the community</li> </ul>	All personnel and site visitors to have appropriate CLC approval and complete the appropriate inductions.	Compliant	A review of site access records confirmed all personnel attending site were included under the CP's CLC permit. Site induction records identified that all employees and contractors were inducted prior to or upon arrival at site. Incident management system records did not identify any employees and contractors who were not inducted.
		A full stakeholder consultation log will be maintained by CP	Compliant	CP conducted regular engagement with stakeholders during the reporting period with the details and outcomes recorded in the stakeholder communications log.
		Early and ongoing community consultation and engagement approach	Compliant	CP conducted regular engagement with stakeholders during the reporting period with the details and outcomes recorded in the stakeholder communications log.
		Local communities and stakeholders advised of CP contact number through multiple channels	Compliant	CP contact details (phone, fax email) are available on our website. Also prior to any major works notices / flyers are provided to identified stakeholders.
		Consult with surrounding stakeholders when major operations will occur	Compliant	Stakeholder communications log records indicated CP's continued engagement with identified stakeholders. Meeting records did not identify any comments related to operations which needed to be assessed or corrective actions implemented.
		CP approved Traffic Management Plan in place	Compliant	Traffic management plans are in place and operational for all CP sites.
		Transportation of over-width or over-dimension loads under approved Department of Transport permit	Not Applicable	No heavy vehicles / equipment mobilised to site, therefore the EPS was not triggered.
		No unauthorised third-party access to infrastructure	Compliant	Incident management system records did not identify any instances of unauthorised access to site.
		Routine alcohol and/or drugs testing for anyone attending the sites	Compliant	Random drug and alcohol testing was undertaken periodically during the reporting period. A review of incident management system and testing records did not identify any incidents or positive tests.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Personnel are appropriately licensed to perform works	Compliant	All CP personnel are appropriately licenced to perform works. CP pre-qualifies contractors who undertake work on site. All personnel are inducted prior to / or upon arrival at site.
		Journey management plan approved by CP	Compliant	Journey management records for the period confirmed that all applicable journeys were planned and approved prior to commencement.

### 2.3 Mandatory Reporting Requirements

Table 2-3 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 2-3 Compliance with Mandatory Reporting Requirements**

No	Reference	Requirement	Compliance Status	Evidence
1	Code cl A.3.5	Geospatial information depicting areas cleared is to be provided to the Minister.	Not Applicable	No areas were cleared during the reporting period.
2	Code cl A.3.6 (b)	Weed management plan developed as part of the EMP must provide for ongoing weed monitoring.	Compliant	The weed management plan was implemented, and monitoring was conducted during the reporting period. The weed management survey conducted September 2020.
3	Code cl A.3.7(a)vi	The fire management plan developed as part of the EMP must provide for annual fire mapping to monitor changes to fire frequency in the relevant areas.	Compliant	The fire management plan includes annual review of the fire mapping. The review was undertaken the risk was reviewed. The risks and mitigations, environmental outcomes and environmental performance standards in the EMP remain appropriate.
4	Code cl A.3.9(c) Code cl A.3.9(e)	The rehabilitation plan developed as part of the EMP requires progressive rehabilitation of significantly disturbed land which is required to commence no longer than 12 months following the cessation of activities on the land. It also requires regular maintenance and annual monitoring of rehabilitated areas.	Not Applicable	All cleared areas are currently used by operations, therefore no remediation was practicable.

No	Reference	Requirement	Compliance Status	Evidence
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.	Not Applicable	No hydraulic fracture stimulation and flowback operations conducted.
6	Code cl B.4.13.2(k)iv	Where venting is the only technically feasible option for managing produced gas, the technical considerations preventing the use of the recovered gas must be recorded and included in the operator's annual report.	Not Applicable	No venting occurs at either DGF or SOF.
7	Code cl B.4.14.2(c)	All new barriers or new well operating envelopes must be verified and clearly documented and reported by submission of an updated well barrier integrity validation (WBIV) report to DPIR.	Compliant	Well barrier reports were submitted to DITT for all DGF and SOF wells in May 2021.
8	Code cl B.4.15.2(j)	Complete and accurate records of the entire decommissioning procedure must be kept, with these records submitted as part of the legislative reporting requirements for the decommissioning of petroleum wells.	Not Applicable	No decommissioning of wells in reporting period.
9	Code cl B.4.17.2(d)	Any guidelines published by the Northern Territory Government from time to time relating to reporting and data submission, and groundwater monitoring data standards must be followed.	Compliant	Groundwater Management Plan submitted to DEPWS was aligned with guideline requirements even guidance was for the Beetaloo. Groundwater monitoring undertaken in accordance with the guideline. Review of groundwater requirements is conducted as part of the document review process during groundwater monitoring events.
10	Code cl C.3(e)	The components of the wastewater management framework, include: Monitor, manage and report in accordance with the Wastewater Management Plan and Spill Management Plan.	Not Applicable	Wastewater from the DGF is managed at the BECGS Facility and is not covered under the approved FEMP. No wastewater is being produced at the Surprise Oil Field as its currently suspended.

No	Reference	Requirement	Compliance Status	Evidence
11	Code cl C.6.1(d)	Wastewater tracking documentation must be reported to the Minister at least annually in accordance with the framework (Spill Management Plan and Wastewater Management Plan) outlined in the EMP	Not applicable	Wastewater from the DGF is managed at the BECGS Facility and is not covered under the approved FEMP. No wastewater is being produced at the Surprise Oil Field.
12	Code cl C.7.1(d)ii	Wastewater Management Plan must include a program for monitoring and reporting against the effectiveness of the measures for the mitigation of interaction with wildlife, stock and human receptors with wastewater.	Not applicable	A wastewater management plan is not required as wastewater as defined under the code is not managed under the approved FEMP.
13	Code cl D.4.3.2(f)	A written report detailing the levels of methane measured, the duration of the unusual readings and the results of the investigation must be submitted within one month of the significantly higher-level methane event being detected.	Not Applicable	No unusual records of methane emissions reported.
14	Code cl D.5.9.2(c)	Emissions from exploration, well construction (including during flowback) and workovers must be measured, and reports submitted.	Not applicable	No exploration, well construction or workovers completed
15	Code cl D.5.9.3(a)	Where natural gas is vented or flared at a gas processing or other downstream facility, emissions must be estimated and reported.	Not Applicable	No venting or flaring occurs at the DGF or SOF.
16	Code cl D.6.1	All mandated government reporting is complied with; and all detectable leaks and emissions are reported on an annual basis.	Partially compliant	Leak detection program conducted. Any leaks would be reported and managed through incident management system. All leaks determined to be below minor leak levels. Upon review of the threshold for the leak detection program it was identified that was set at >999ppm. This will now be updated to reflect the 500ppm threshold in the CoP.
17	Code cl D.6.2(a)	Reports of baseline assessments must be submitted at the conclusion of each field campaign.	Not Applicable	No pre-exploration or pre-operation baseline assessments were conducted as wells were in production.

No	Reference	Requirement	Compliance Status	Evidence
18	Code cl D.6.2(b)	Emissions reporting must be in accordance with Section D.5.6. Emissions associated with venting and flaring as described in Section D.5.9 must be provided separately to the Northern Territory Government in accordance with this Code.	Compliant	No venting or flaring is conducted at the DGF or SOF. Emissions are reported under the NGER Act as required. Leak detection program was completed in June 2021.
19	PER 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.	Not Applicable	FEMP is currently in force. No notification has been made to the Minister that the activity is no longer being carried out.
20	PER 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.
21	PER 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.
22	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, drilling, or seismic surveys.	Not Applicable	No construction, drilling or seismic survey activities were conducted, therefore no notification necessary.
23	PER 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 resulting from activities outlined in the FEMP.

No	Reference	Requirement	Compliance Status	Evidence
24	PER 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 resulting from activities outlined in the FEMP.
25	PER 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.	Compliant	All recordable incidents reports were submitted as required for the approved EMP from commencement of approval as follows: <ul style="list-style-type: none"> <li>▪ Jul to Sep 20</li> <li>▪ Oct to Dec 20</li> <li>▪ Jan to Mar 21</li> </ul>
26	Schedule 1, item 11(2)	Environmental report to be submitted to DITT / DEPWS annually	Compliant	This is the annual environmental performance report for the DGF and SOG FEMP.
27	NPI 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 reporting necessary as CP did not have any substances where thresholds were exceeded.
28	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	Reporting greenhouse gas emissions for the DGF and SOF was undertaken in accordance with the <i>National Greenhouse and Energy Reporting Act 2007</i> and was submitted to the Clean Energy Regulator in September 2020 for the FY20 NGERs reporting period. Reporting for the FY21 period is pending submission.
29	PER Schedule 1 Item 9(2)	Interest holders are required to conduct future engagement with stakeholders, in accordance with the description in the EMP.	Compliant	CP conducted regular engagement with stakeholders during the reporting period with the details and outcomes recorded in the stakeholder communications log.

## 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 115 total compliance items.

**Table 3-1 Compliance Summary**

Compliance Indicator	Number	Percentage
Compliant	85	74%
Partially Compliant	1	1%
Non-Compliant	0	0%
Not Applicable	29	25%

### 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

No partially compliant environmental performance standards were identified during the review of annual environmental performance.

#### 3.2.2 Regulatory Reporting

One reporting requirement was found to be non-compliant or partially compliant.

Description	Potential environmental harm or impact	Corrective actions
Leak detection program used incorrect threshold values to determine minor leak.	No material environmental harm or impact. No major or significant leaks were detected across 185 test locations.	Future leak detection program monitoring has revised the threshold criteria for minor leaks.

### 3.3 Application of Lessons Learned Across CP Onshore Interests

CP continues to refine processes and procedure to ensure compliance with the Code of Practice and the obligations of the FEMP. Ongoing communication is occurring across the organisation to raise awareness of the requirements of the FEMP and the environmental performance standards, particularly given this FEMP is in its first year of implementation. Corrective actions continue to be implemented in response to events reported within the incident management system.