

BEETALOO SUB-BASIN VELKERRI 76 S2 DRILLING, STIMULATION AND WELL TESTING

Annual Environmental Performance Report

Tamboran B2 Pty Ltd



Document Details

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Permit EP 76			
Interest holder details	Tamboran B2 Pty Ltd ABN 42 105 431 525		
Operator details	Tamboran Resources Ltd 110-112 The Corso Manly NSW 2095		
Approved by	Matt Kernke: Vice President Environment and Approvals		
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Signature and certification

I hereby declare that the information provided in this annual environment performance report and accompanying documents is to the best of my/our knowledge, true and correct.			
Signature	ire and a second se		
Name	Matt Kernke		
Position	Vice President Environment and Approvals		
Date	22 March 2024		

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1. INTRODUCTION

The Northern Territory (NT) Petroleum (Environment) Regulations 2016 (the Regulations) include a requirement¹ for the interest holder to provide a report to the Minister on an annual basis that outlines the environmental performance of regulated activities.

The Annual Environment 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). The report is to consider information required to be recorded, monitored or reported under the Regulations and any other law in force in the NT related to conduct of the regulated activity.

This AEPR covers the regulated activities approved under the *Beetaloo Sub-basin Velkerri 76 S2 Drilling, Stimulation and Well Testing Environment Management Plan (EMP)*, approved 23 December 2019. The AEPR covers the reporting period of the 24 December 2022 – 23 December 2023 as reported by Tamboran B2 Pty Ltd (Tamboran).

1.1 Acronyms and abbreviations

Acronym	Definition		
ААРА	Aboriginal Areas Protection Authority		
AEPR	Annual Environment Performance Report		
CMS	Compliance management system		
Code	Code of Practice: Onshore Petroleum Activities in the Northern Territory		
DEPWS	Department of Environment, Parks and Water Security		
DITT	Department of Industry, Tourism and Trade		
EMP	Environment management plan		
ha	hectare		
NT	Northern Territory		
Regulations	Petroleum (Environment) Regulations 2016		
RMP	Rehabilitation management plan		
WBIV	Well barrier integrity verification		

Table 1: Summary of acronyms and abbreviations

1.2 Background

The regulated activities that have been assessed under this AEPR are those covered under the *Beetaloo Sub-basin Velkerri 76 S2 Drilling, Stimulation and Well Testing EMP,* approved 23 December 2019. There were no regulated activities undertaken during the reporting period 24 December 2022 – 23 December 2023.

The location of the regulated activities is provided in Figure 1.

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



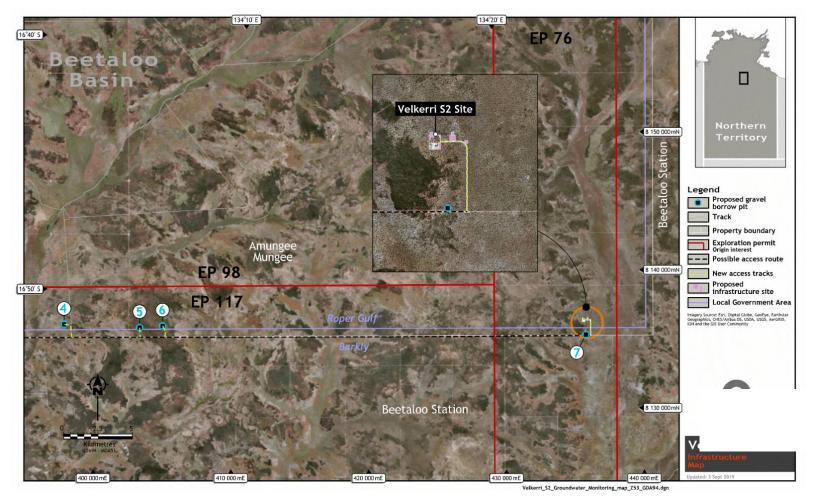


Figure 1: Beetaloo Velkerri 76 S2 drilling, stimulation and well testing location (EP 76)

1.3 Contents of performance report

This AEPR describes the environmental performance of the interest holder by evaluation of the following:

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

1.4 Assessment of compliance

Table 2 shows the compliance status indicators used in this AEPR which have been defined by the Department of Environment, Parks and Water Security (DEPWS).

Indicator	Description
Compliant	Compliant with requirement for entire 12-month reporting period
Not compliant	Interest holder did not comply with the requirement during the reporting period
Not applicable	Requirement not applicable during the reporting period

Table 2: Compliance descriptors

1.5 Evidence of compliance

The following sources of evidence are used to demonstrate compliance:

- 1. Internal monitoring of compliance by the interest holder.
- 2. Outcomes from regulatory inspection/s conducted by the DEPWS, Petroleum Operations.
- 3. Recordable and reportable incident reports submitted to DEPWS Petroleum Operations.
- 4. Reports provided to DEPWS, DITT and other government agencies.

2. DEMONSTRATION OF COMPLIANCE

2.1 Ministerial condition compliance

Table 3 demonstrates Tamboran's compliance with Ministerial EMP approval conditions.

Table 3. Ministerial condition summary table

No	Ministerial condition	Complianc e Status	Evidence
1	The Interest Holder must submit to DEPWS, an updated timetable for the regulated activity prior to the commencement of the activity and provide an updated timetable to DEPWS each month. The timetable must include dates for the implementation of commitments, development of key documents and associated hold points.	Compliant	Monthly reports were provided to DEPWS on the following dates: 21 December 2022 27 January 2023 20 February 2023 23 March 2023 23 March 2023 22 April 2023 22 May 2023 27 June 2023 31 July 2023 24 August 2023 22 September 2023 30 October 2023 23 November 2023 22 December 2023
2	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 commissioning equipment that is in hydrocarbon service and under pressure and record to an auditable standard.	Not applicable	No regulated activities were undertaken under this EMP during the reporting period.
3	The Interest Holder must provide to DEPWS an analysis of offsite disposal and beneficial use options, other than flaring, for liquid hydrocarbons if the combustion of liquid hydrocarbons at the flare exceeds an average of 5000 litres per day during the first month or following months of flaring.	Not applicable	No regulated activities were completed under this EMP during the reporting period.
4	In the event of any accidental release (overflow, failure, spill or leak) to ground of flowback fluid wastewater that exceeds 200 litres,	Not applicable	No regulated activities were commenced or completed under this EMP during the reporting period.



No	Ministerial condition	Complianc e Status	Evidence
	the interest holder must provide a written report to DENR within 24 hours after the incident was detected. The report must contain: Details of the incident specifying material facts, actions taken to avoid or mitigate environmental harm The corrective actions taken including the volume and depth of impacted soil removed for appropriate disposal if required; and Any correction actions proposed to be taken to prevent recurrence of an incident of a similar nature.		
5	The interest holder must provide DENR a fortnightly weather forecast for the risk of onset of wet weather for the duration of the regulated activity.	Compliant	No regulated activities were commenced or completed under this EMP during the reporting period. However, monthly reporting is provided as per Ministerial condition 1, which includes monthly and 3 monthly weather outlooks.
6	The interest holder must provide to DENR a cementing report for the surface casing (13 3/8") through the aquifers, as soon as practicable but not more than 14 days after completion of the cementing job for the Velkerri exploration well EP76 S2-1.	Not applicable	No regulated activities were commenced or completed under this EMP during the reporting period.



2.2 Environmental outcomes and performance standards

Table 4 provides a systematic overview of compliance with the environmental outcomes and environmental performance standards within the approved EMP.

#	Environmental outcomes	Environmental performance standard	Compliance	Evidence
1	• Avoid, minimise and control soil erosion and discharge of sediment	 No vegetation clearing to be undertaken under EMP 	Not applicable	No regulated activities were undertaken during the reporting period
2	 or soil into waterways or established drainage systems Minimise disturbance of soil, vegetation and drainage during site activities Minimise the creation of dust Prevent the contamination of soil to maintain the viability of soil 	 No incidence of erosion and sedimentation causing material environmental harm. 'Material environmental harm' is defined in section 117AAB(1) of the Petroleum Act and in section 7.7.1 of the plan. 	Not applicable	No regulated activities were undertaken during the reporting period.
3	resources	Areas left safe, stable and non-polluting	Not applicable	No regulated activities were undertaken during the reporting period.
4		 No spills of chemicals or wastewater that have resulted in material environmental harm 	Not applicable	No regulated activities were undertaken during the reporting period.
5		 Return disturbed areas to a stable condition such that they are returned to a condition as close as practicable to the surrounding area (or pre- 	Not applicable	No regulated activities were undertaken during the reporting period.

Table 4: Environmental outcome and performance standard compliance summary



#	Environmental outcomes	Environmental performance standard	Compliance	Evidence
		disturbance state) within an acceptable time frame.		
6		No offsite releases of wastewater.	Not applicable	No regulated activities were undertaken during the reporting period.
7		 Zero onsite spills of wastewater >2,500 L. 	Not applicable	No regulated activities were undertaken during the reporting period.
8		Zero wastewater transport spills.	Not applicable	No regulated activities were undertaken during the reporting period.
9		Zero wastewater tank overtopping events.	Not applicable	No regulated activities were undertaken during the reporting period.
10	• Avoid and minimise the potential	• No use of surface water.	Not applicable	No use of surface water allowed.
11	contamination caused by the discharge of sediment or contaminated storm water to waterways or established drainage systems.	 No release of drilling and stimulation wastewater to watercourses or areas surrounding the lease pad. 	Not applicable	No regulated activities were undertaken during the reporting period.
12	 Contain any potential contaminants for treatment or disposal. 	 No spills or releases of sediment to watercourses causing material environmental harm. 'Material environmental harm' is defined in section 117AAB(1) of the Petroleum Act and in section 7.7.1 of the plan. 	Not applicable	No regulated activities were undertaken during the reporting period.
13		 No offsite releases of wastewater. 	Not applicable	No regulated activities were undertaken during the reporting period.



#	Environmental outcomes	Environmental performance standard	Compliance	Evidence
14		 Zero onsite spills of wastewater >2,500 L. 	Not applicable	No regulated activities were undertaken during the reporting period.
15		 Zero wastewater transport spills Environment Management Plan NT-2050- 15-MP-032 121. 	Not applicable	No regulated activities were undertaken during the reporting period.
16		Zero wastewater tank overtopping events.	Not applicable	No regulated activities were undertaken during the reporting period.
17	• To manage exploration activities to prevent over-extraction of groundwater	• Groundwater take less than maximum permitted volume of 38 ML for the activity.	Not applicable	No regulated activities were undertaken during the reporting period.
18	Preserve groundwater quantity for livestock supplies (the surrounding water use)	 No material impairment of any surrounding pastoralist extraction bores associated with Tamboran's activities. Impairment is defined as a 1 m drawdown in the static water level of the bore attributable to Tamboran's activities. 	Not applicable	No regulated activities were undertaken during the reporting period.
19		 No material change in quality attributed to Tamboran's stimulation activities at the surrounding impact monitoring bore. Material change is defined as a (>1 year) reduction of groundwater quality 	Not applicable	No stimulation activities were undertaken during the reporting period.



#	Environmental outcomes	Environmental performance standard	Compliance	Evidence
		exceeding the ANZECC Guidelines for Livestock use.		
20	Minimise additional disturbance to flora and fauna	 No unauthorised clearing of vegetation. 	Not applicable	No regulated activities were undertaken during the reporting period.
21	 No disturbance to high conservation areas 	 No native flora or fauna impacts due to wastewater or chemical exposure. 	Not applicable	No regulated activities were undertaken during the reporting period.
22	 Avoid the introduction of weeds Avoid the spread of existing weeds 	 No introduction or spread of declared weeds resulting from Tamboran's activities. 	Not applicable	No regulated activities were undertaken during the reporting period.
23		 Six-monthly weed inspections completed on all activity areas- including camp and drill pads, access tracks, borrow pits. 	Compliant	The approved EMP includes a weed management plan. Annual weed monitoring report for 2022 – 2023 was submitted DEPWS on 15 December 2023. No regulated activities have been undertaken during the reporting period under this EMP. (NOTE: The last weed inspection at Velkerri was completed on 9 February 2024, due to site
24	 Minimise impacts on soil, surface water, groundwater, sensitive habitat and air quality 	 All waste volumes tracked whilst on-site and in transport. 	Not applicable	access in December.) No regulated activities were undertaken during the reporting period.
25	Minimise creation of food sources or habitat for pest species	 Waste transport certificates available for all wastes generated. 	Not applicable	No regulated activities were undertaken during the reporting period. No regulated activities were undertaken during the reporting period.



#	Environmental outcomes	Environmental performance standard	Compliance	Evidence
26	 Minimise waste generation through reduce, reuse, recycle programs 	 No off-site releases of wastewater or waste products. 	Not applicable	No regulated activities were undertaken during the reporting period.
27		 Zero wastewater tank overtopping events. 	Not applicable	No regulated activities were undertaken during the reporting period.
28		 Zero onsite spills of wastewater >2,500 L to grade (compacted lease pad surface). 	Not applicable	No regulated activities were undertaken during the reporting period.
29		• Zero wastewater transport spills.	Not applicable	No regulated activities were undertaken during the reporting period.
30		 No material environmental harm resulting from spills. Material environmental harm' is defined in section 117AAB(1) of the Petroleum Act. 	Not applicable	No regulated activities were undertaken during the reporting period.
31	 Minimise environmental nuisance at sensitive receptors Minimise greenhouse gas 	 No valid complaints regarding dust / air quality resulting from Tamboran's activities. 	Not applicable	No regulated activities were undertaken during the reporting period.
32	emissions	• All complaints responded to and, where appropriate, corrective action taken.	Not applicable	No regulated activities were undertaken during the reporting period.
33	 Manage activities in accordance with occupational health and 	 No valid nuisance-related complaints received from sensitive receptors. 	Not applicable	No regulated activities were undertaken during the reporting period.



#	Environmental outcomes	Environmental performance standard	Compliance	Evidence
34	 safety guidelines for noise, vibration and light exposure Minimise nuisance noise and vibration impacts on surrounding communities or exploration workers Minimise disruption to fauna and stock 	 All complaints responded to and, where appropriate, corrective action taken. 	Not applicable	No regulated activities were undertaken during the reporting period.
35	 Minimise the risk of causing bushfires from Tamboran's activities Minimise impacts on environmental habitat and fauna, impacts on stakeholders, impacts on culturally-significant sites, public infrastructure and community lands Ensure proper health and safety plan for activities Prevent accidental fire risk and ensure safe storage of chemicals to prevent fire damage 	 No uncontrolled fires occurring as a result of exploration works. 	Not applicable	No regulated activities were undertaken during the reporting period.
36	Avoid disturbance or damage to Aboriginal cultural heritage artefacts or sacred sites	 No unauthorised activities within or access to a Restricted Work Area. 	Not applicable	No regulated activities were undertaken during the reporting period.
37	Minimise impacts and disruption to activities of Indigenous	No non-compliances with AAPA certificate conditions.	Not applicable	No regulated activities were undertaken during the reporting period.



#	Environmental outcomes	Environmental performance standard	Compliance	Evidence
	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 employees, contractors and the community is not compromised through management of cultural and environmental awareness			
38	Minimise impacts on the local community and services	All complaints are responded to and closed out.	Not applicable	No regulated activities were undertaken during the reporting period.
	Minimise safety risks to the public and other third-parties	 >60% of addressable spend provided to NT businesses 		No regulated activities were undertaken during the reporting period.
39	 Maintain and enhance partnerships with the local community, including using local contractors and maximising opportunities for local employment and training 	(addressable spend is defined as material and services where an NT service provider exists and is capable of providing the goods and services required).	Not applicable	



2.3 Mandatory reporting requirements

Table 5 demonstrates compliance with reporting requirements in the Code and interest holder's compliance with reporting requirements under the Regulations, schedule 1, item 11(2) – i.e. that all information to be recorded, monitored or reported has been provided. Where relevant, Tamboran has also confirmed that all records, monitoring or required reporting under the Regulations² has been provided to DEPWS or the relevant NTG agency.

Table 5: Summary of mandatory reporting requirements

#	Reference	Requirement	Compliance status	Evidence
1	Code A.3.5	Geospatial information depicting areas cleared is to be provided to the Minister.	Not applicable	No clearing has occurred under this EMP.
2	Code A.3.6(b)	Weed management plan developed as part of the EMP must provide for ongoing weed monitoring.	Compliant	The approved EMP includes a weed management plan. Annual weed monitoring report for 2022 – 2023 was submitted DEPWS on 15 December 2023. No regulated activities have been undertaken during the reporting period under this EMP.
3	Code 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 approved EMP includes a fire management plan. Annual fire frequency report submitted to DEPWS on 27 September 2023. No regulated activities have been undertaken during the reporting period under this EMP.
4	Code A.3.9(c) Code A.3.9(e)	The rehabilitation plan developed as part of the EMP requires progressive rehabilitation of significantly disturbed land which is	Compliant	Rehabilitation management plan developed and submitted to DEPWS as part of the approved EMP. The rehabilitation requirements are not applicable as all sites remain operational, with rehabilitation activities not undertaken to date.

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



#	Reference	Requirement	Compliance status	Evidence
		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.		
5	Code 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): total volume of hydraulic fracturing fluid pumped, 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 typical and maximum concentrations of chemicals or other substances used. 	Not applicable	No well hydraulic fracturing activities were completed during the reporting period.
6	Code B.4.13.2(k)iv	Where venting is the only technically feasible option for managing produced gas, the technical considerations	Not applicable	No exploration activities were completed during the reporting period.



#	Reference	Requirement	Compliance status	Evidence
		preventing the use of the recovered gas must be recorded and included in the operator's annual report.		
7	Code 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.	Not applicable	No exploration activities have been undertaken under this EMP.
8	Code 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 activities have commenced.
9	Code 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	 All water monitoring bore completion reports have been submitted to DEPWS, including initial water quality data post completion. Groundwater monitoring has been completed in accordance with the Preliminary guidelines for groundwater monitoring bore for exploration petroleum wells in the Beetaloo Sub-basin. Stimulation has not been undertaken and is not currently planned for this site in the next 12 months; with all bores considered baseline. Water extraction levels reported and submitted to DEPWS at least monthly via WALAPs.



#	Reference	Requirement	Compliance status	Evidence
10	Code 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.	Compliant	The approved EMP includes a WWMP and SMP. No regulated activities have been undertaken during the reporting period under this EMP.
11	Code C.6.1(d)	Wastewater tracking documentation must be reported to the Minister at least annually in accordance with the framework provided in the EMP.	Not applicable	No exploration activities or waste streams have been generated for the regulated activities under this EMP.
12	Code 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.	Compliant	Wastewater management plan includes a monitoring program to detect impacts from wastewater storages on fauna and human receptors.
13	Code 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 (including remedial actions) must be submitted within one month of the significantly higher-level	Not applicable	Not applicable to the scope of this AEPR. This condition is associated with production and not exploration.



#	Reference	Requirement	Compliance status	Evidence
		methane event being detected.		
14	Code D.5.9.2(c)	Emissions from exploration, well construction (including during flowback) and workovers must be measured and reports submitted.	Not applicable	No regulated activities undertaken during the reporting period.
15	Code 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	The regulated activities within the EMP do not include downstream operations.
16	Code D.6.2(a)	Reports of baseline assessments must be submitted at the conclusion of each field campaign.	Not applicable	CSIRO completed baseline assessments through DITT.
17	Code 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.	Not applicable	No regulated activities have occurred during the reporting period.
18	Regulations 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	Compliant	The EMP has approximately 1.5 years remaining before the next review.



#	Reference	Requirement	Compliance status	Evidence
		have been met, and the Minister advises the interest holder the notice is accepted and the plan ceases to be in force.		
19	Regulations 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	No reportable incidents have been recorded during the reporting period.
20	Regulations 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	No reportable incidents have been recorded during the reporting period.
21	Regulations Reg 35	A written report of all recordable incidents must be provided to DEPWS not later than 15 days after the 90-day reporting period (unless otherwise agreed).	Compliant	Quarterly recordable incidents reports were provided to DEPWS as follows: Q1 2023 report provided 13/04/2023 Q2 2023 report provided 14/07/2023 Q3 2023 report provided 13/10/2023 Q4 2023 report provided 15/01/2024



#	Reference	Requirement	Compliance status	Evidence
				One minor administrative recordable incident reported on 10 October 2023 (Q4 reporting). Insufficient recorded evidence of site inspections was being retained by the contractor. Tamboran has re-implemented the site inspection checklist with the contractor completing the site inspections.
22	Regulations 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	No regulated activities were recorded completed during the reporting period.
23	Regulations 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	No hydraulic fracture stimulation or well testing activities completed during the reporting period.
24	Regulations Schedule 1, item 9(2)	Interest holders are required to conduct future engagement with stakeholders, in accordance with the description in the EMP.	Compliant	 Land access agreements are in place covering all current and future activities. Stakeholder engagement with immediately affected parties is ongoing, with the frequency of the engagement dependent on the level of activity being completed onsite at a given point of time.
25	Regulations Schedule 1, item 12	Interest holder must notify the Minister, occupier of the land and owner of the land on which the activity is to be carried out before commencement of activity.	Not applicable	No regulated activities were undertaken during the reporting period.



#	Reference	Requirement	Compliance status	Evidence
26	Environment Protection Act 2019 (NT) div 8	Duty to notify the NT EPA as soon as practicable but within 24 hours of any incident which occurs which causes or threatens to cause material or significant environmental harm.	Not applicable	No regulated activities were undertaken during the reporting period.
27	Waste Management and Pollution Control Act 1998 (NT) s 14	Duty to notify the NT EPA as soon as practicable but within 24 hours of any incident which occurs which causes or threatens to cause pollution resulting in material or significant environmental harm	Not applicable	No regulated activities were undertaken during the reporting period.

3. SUMMARY OF COMPLIANCE

3.1 Overview of compliance

Table 6 provides a summary of the results of the compliance assessment against the EMP.

Table 6: Beetaloo Velkerri 76 S2 drilling, stimulation and well testing EMP compliance summary

Compliance indicator	Number	Percentage
Compliant	12	100%ª
Not compliant	0	0%
Not applicable	58	N/A

^a Excludes regulatory requirements that are not applicable.

3.2 Overview of items found not 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, 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 Ministerial approval conditions

No non-compliances with Ministerial conditions were observed during the reporting period.

3.2.2 Environmental performance standards

No non-compliance with an environmental performance standard was recorded during the reporting period.

3.2.3 Regulatory reporting

One minor issue with insufficient recorded evidence of site inspections being retained by the contractor.

3.3 Application of lessons learned across Tamboran's onshore interests

Tamboran has re-implemented the site inspection checklist with the contractor completing the site inspections.