



# **Annual Environmental Performance Report**

Mereenie Oil and Gas Field  
Field Environmental Management Plan

**September 2020**

### Document Details

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### Document Control

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1	14 September 2020	Cameron Lambert	Initial submission
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### Signature and Certification

We hereby declare that the information provided in this annual environment performance report and accompanying documents is to the best of our knowledge, true and correct.	
<b>Signature</b>	
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<b>Position</b>	Manager Drilling and Completions (COO Authority)
<b>Date</b>	2 October 2020

## Glossary

Abbreviation / Acronyms	Definition
<b>AAPA</b>	Aboriginal Areas Protection Authority
<b>AEPR</b>	Annual Environment Performance Report
<b>CoP</b>	Code of Practice
<b>CP</b>	Central Petroleum Limited
<b>CTP</b>	Central Treatment Plant
<b>DENR</b>	Department of Environment and Natural Resources
<b>DPIR</b>	Department of Primary Industry and Resources
<b>EMP</b>	Environmental Management Plan
<b>EM</b>	East Mereenie
<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>MRN</b>	Mereenie Oil and Gas Field
<b>NEMP</b>	National Environment Management Plan
<b>NLC</b>	Northern Land Council
<b>NORMS</b>	Naturally Occurring Radioactive Materials
<b>NT</b>	Northern Territory
<b>OL4</b>	Operating Licence Four
<b>OL5</b>	Operating Licence Five
<b>PL2</b>	Pipeline Licence Two
<b>TO</b>	Traditional Owner
<b>WM</b>	West Mereenie

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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 Mereenie Oil and Gas Field (MRN) 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 MRN Field Environmental Management Plan (FEMP) approved 13 March 2019 and any other law in force in the Northern Territory related to conduct of the regulated activity.

The AEPR covers the period from 13 March 2019 to 12 March 2020, being the 12-month period subsequent to the approval date for the EMP listed above. Activity was undertaken at the MRN continuously during the reporting period as indicated in the shaded periods shown in Figure 1-1.

Activity	2019											2020	
	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	
Civil maintenance		↔		↔				↔			↔		
Well bore management	←	←	←	←	←	←	←	←	←	←	←	←	
Gas and oil systems	←	←	←	←	←	←	←	←	←	←	←	←	
Pipeline and flowline operations	←	←	←	←	←	←	←	←	←	←	←	←	
Processing facilities	←	←	←	←	←	←	←	←	←	←	←	←	
Fuel and chemical storage, handling	←	←	←	←	←	←	←	←	←	←	←	←	
Waste management	←	←	←	←	←	←	←	←	←	←	←	←	

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

## 1.1 Background

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

- Civil maintenance including road, tracks and lease maintenance
- Well bore management
- Gas and oil systems
- Pipeline and flowline operations
- Processing facilities
- Fuel and chemical storage and handling
- Waste management

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 the MRN is shown in Figure 1-2.

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

## 1.2 Contents of Performance Report

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

1. Compliance with Ministerial approval conditions
2. Compliance with each environmental outcome and performance standard within the approved EMP
3. Compliance with reporting requirements in accordance with regulations
4. All recordable and reportable incidents, including root cause analysis and related corrective actions to prevent re-occurrence
5. Findings of all regulatory inspections and audits and related actions to address any findings

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

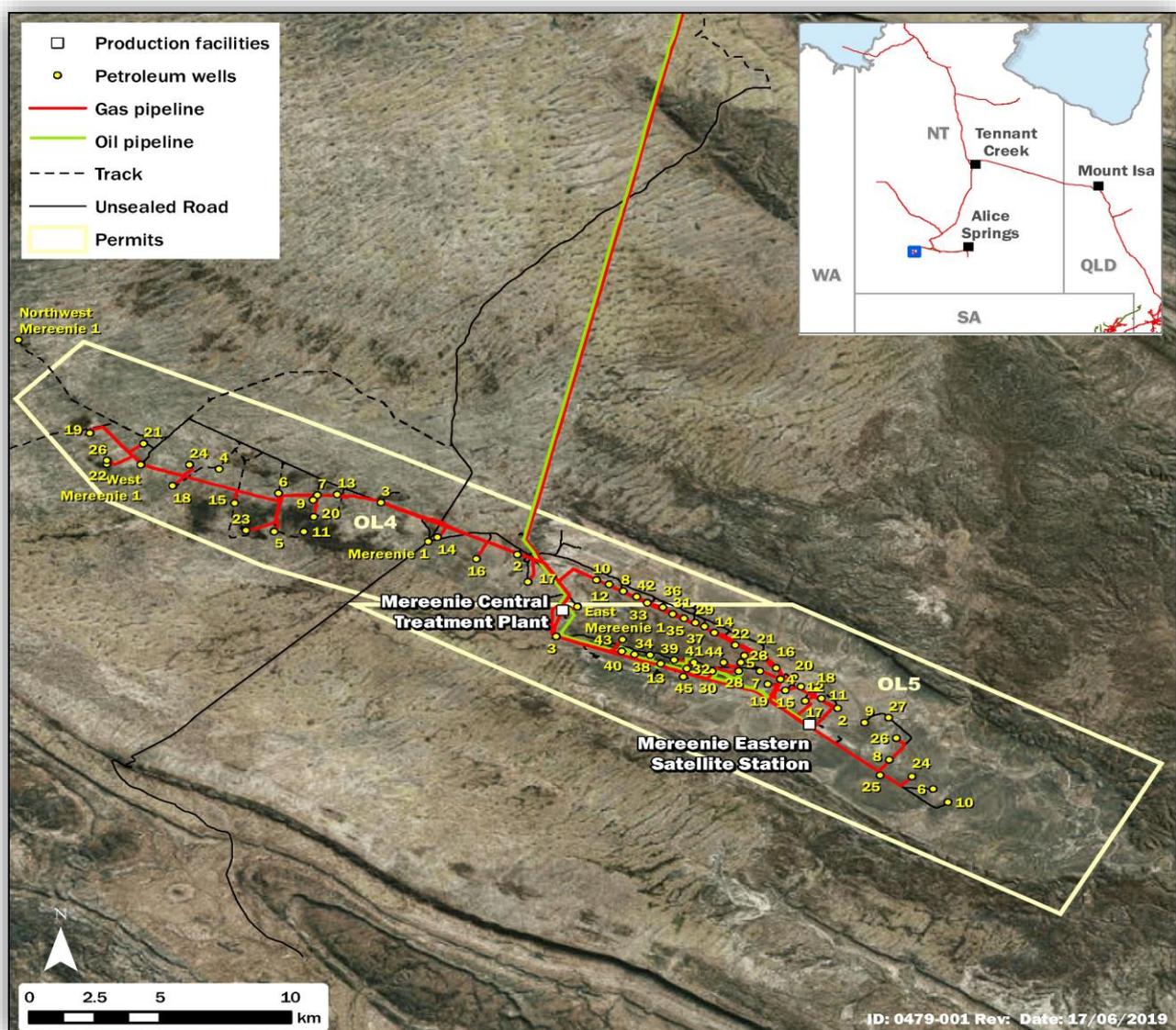


Figure 1-2 Mereenie Oil and Gas Field Location

### 1.3 Assessment of Compliance

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

**Table 1-1 Compliance Descriptors**

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

### 1.4 Evidence of Compliance

The following sources of evidence are used to demonstrate compliance:

1. Internal tracking of compliance by CP through:
  - Inspections, as committed to in the MRN FEMP
  - Our incident management system records
  - Quarterly environmental inspections
    - March, June, September, December 2019 and March 2020
  - 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
  - External annual audits of compliance as follows:
    - MRN FEMP audits, conducted in June 2019
2. Reports provided under the National Greenhouse and Energy Reporting Act
3. Outcome from regulatory inspections conducted by the Department of Environment and Natural Resources (DENR), Petroleum Operations
4. Recordable and reportable incident reports submitted to DENR Petroleum Operations
5. Reports provided to DENR, the Department of Primary Industries and Resources (DPIR) and other government agencies.

## 2.0 Demonstration of Compliance

### 2.1 Ministerial Approval Conditions

The MRN FEMP was approved by the Minister for Primary Industry and Resources on 14 March 2018 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	2(a) Determination of an environmental security in a form accepted by the Department of Primary Industries and Resources	Compliant	Environmental security bonds are currently in place for OL4, OL5 and PL2 these bonds are held by Central and Santos. CP engaged an independent civil engineering and resource industry services company, to develop an estimate for end-of-life closure and rehabilitation based on their own and industry rates for demolition, waste removal and disposal, and site rehabilitation. Central submitted these estimates and a proposed environmental security to DENR in August 2019.
2	2(b) Submitted no later than 12 months from the date of this Approval Notice	Compliant	The quantum of additional security is still to be determined. CP had a meeting with DIPR and DENR on 10 July 2020 to resolve, however we are currently awaiting advice.

### 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 MRN FEMP. The environmental outcomes for the MRN FEMP (as listed in Table 2-2 below) are sourced from the 'environmental objectives' in Table 8-1 of the MRN FEMP and the environmental performance standards sourced from 'environmental outcomes' in Table 8-1 of the MRN FEMP and the 'mitigation measures / performance standards' in Tables 8-2 to 8-13.

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

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
1	Prevent a loss of biodiversity through injury to fauna, unauthorised disturbance to	No off-road driving	Partially Compliant	Routine inspections and incident management records during the period identified one instance of light vehicle wheel tracks (presumed to be a member of the public or TOs who have access to the lease area for mustering and other activities) being identified as having driven off road across the lease. Whilst walking the identified tracks no damage to vegetation was identified.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	native flora, fauna and fauna habitat, the spread of weeds, increases in predator species, introduced fauna because of the activities conducted in the OL area.	No driving above designated speed limits	Compliant	Incident management system records during did not identify any instances of vehicles speeding.
		No unauthorised night-time driving	Compliant	Incident management system records did not identify any instances of unauthorised night-time driving. Also, journey management system records didn't identify any approved night-time driving.
		No driving under the influence of alcohol, BAC=0	Compliant	Incident management system records did not identify any instances of employees or contractors driving under the influence of alcohol.
		Fauna fatalities register completed for each incident and near miss and appropriate action taken to reduce potential for further incidents	Compliant	The animal control register was used to record any instances of sightings, near misses or strikes as required across sight. One fauna fatality related incident was identified where a kangaroo collided with a vehicle.
		No fauna access to waste	Partially Compliant	Regular area inspections did not identify any instances where bins did not have secure lids to prevent fauna access / interference. However, the incident management system records identified two instances where bins were not adequately secured, and a dingo gained access. These bins have since been replaced and no further incidents have been identified.
		No weeds will be present in areas where fill has been used	Not Applicable	Not fill was used at the operation during the reporting period, therefore the EPS was not triggered.
		No new infestation of weeds	Compliant	The annual weed survey undertaken in July 2019 did not identify any new NT declared weeds or Weeds of National Significance. Weed management activities continued during the period.
		No spills or lead of hazardous material into surrounding environment	Partially Compliant	Incident management system records identified several minor spills and leaks. All of the spills and leaks were remediated in accordance with the NEMP guidelines.
		No unauthorised land clearing	Not Applicable	No clearing was required or undertaken during operational activities therefore the EPS was not triggered.
No unauthorised third-party access	Compliant	Incident management system records did not identify any instances of unauthorised access to site.		

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		All spills or leaks of hazardous material will be remediated in accordance with the NEMP guidelines	Compliant	Incident management system records identified that all leaks and spills were effectively remediated in accordance with NEMP guidelines .
		All vehicles will be serviced according to vehicle manufacturer specifications and frequency requirements and the NT Motor Vehicle registry standards	Compliant	All CP controlled vehicles were serviced as demonstrated through closed work orders and schedules in our maintenance system which confirmed that all vehicles have established preventative maintenance schedules and activities were executed in line with NT standards and manufacturers requirements.
		No feeding of local fauna	Compliant	Incident management system records did not identify any instances of employees or contractors feeding local fauna.
		Areas no longer required for safe operation will commence rehabilitation within 12 months of decommissioning	Not Applicable	No areas have been decommissioned during the reporting period therefore the EPS was not triggered.
2	Prevent land degradation as a result erosion (water / wind) and sedimentation issues, new road / clearing / construction and maintenance activities as well as topsoil management activities conducted in the OL area	No unauthorised clearing	Not Applicable	No clearing was required or undertaken, all activities were undertaken within previously cleared areas, therefore, the EPS was not triggered.
		Location of topsoil mounds will be clearly marked and less than 1.5m high	Not Applicable	No land disturbance was undertaken under the MRN FEMP therefore the EPS was not triggered.
		No off-road driving	Partially Compliant	See comments in 'environment outcome 1' in relation to no off-road driving.
		No unauthorised third-party access	Compliant	Incident management system records did not identify any instances of unauthorised access to site.
		Areas no longer required for safe operation will commence rehabilitation within 12 months of decommissioning	Not Applicable	No areas have been decommissioned during the reporting period therefore the EPS was not triggered.
		All erosion and sedimentation control devices will be designed and constructed following DENR and IECA guidelines and best practice principles	Compliant	Area inspections records confirmed that erosion and sedimentation control devices were in place and compliant with DENR and IECA best practice guidelines. Incident management system records did identify some minor instances of erosion which were remediated and closed out in our maintenance system.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		No windrows or concentration points	Compliant	Area inspections records did not identify any windrows or concentration points on any project related areas.
		Disturbed areas will be restored to a landform consistent with surrounding environment with no blocking of drainage channels or water courses	Not Applicable	No areas were disturbed as all operational activities were undertaken within previously cleared areas which are being used for operational activities. Therefore, the EPS has not been triggered.
		No new erosion or sedimentation will occur on rehabilitated surfaces first significant rainfall	Not Applicable	No rehabilitation was needed as all activities were undertaken within previously cleared areas which are currently being used for operational activities. Therefore, the EPS has not been triggered.
		Annual Rehabilitation Report will be submitted to DPIR / DENR with information regarding: <ul style="list-style-type: none"> <li>- total area rehabilitated</li> <li>- photo monitoring points, GPS locations and results</li> <li>- any areas left in agreement with future landholders/managers</li> <li>- monitoring of progressive rehabilitation, including flora type and density, fauna activity, and soil stability</li> <li>- any erosion and sedimentation issues</li> <li>- any stakeholder consultations and results of discussions</li> <li>- any issues noticed and remedial actions taken</li> <li>- monitoring of contaminated sites</li> </ul>	Not Applicable	No areas were rehabilitated during the period. All activities were undertaken within previously cleared areas currently being used for operational activities. Therefore, the EPS has not been triggered.
		All staff will be inducted to the FEMP / EMP	Compliant	MRN site induction records identified that all employees and contractors were inducted prior to or upon arrival at site and before any work commenced. Incident management system records did not identify any employees and contractors who were not inducted. Induction materials include content which deals with erosion and sedimentation.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
3	To prevent surface and groundwater degradation, contamination or alteration to natural drainage patterns and flow lines, downstream water courses as a result of activities conducted in the OL area	Clearing works or disturbance will not affect the long-term stability of existing drainage channels or water courses	Not Applicable	No clearing was required or undertaken, all activities were undertaken within previously cleared areas, therefore, the EPS was not triggered.
		Regular testing of groundwater quality, extraction volumes and static water level recorded.	Partially Compliant	Groundwater extraction records were recorded, and testing results did not identify any adverse changes to ground water. Static water level monitoring has not been performed as planned over the reporting period as part of regular bore monitoring activities.
		No uncontrolled or unregulated release of wastes	Compliant	Incident management system records did not identify any instances of uncontrolled or unregulated release of wastes.
		No waste or hazardous material stored with potential for impact on water courses	Compliant	Regular area and environmental inspections records confirmed that all hazardous chemical was stored in a bunded areas with appropriate spill kits and SDS available. No incidents of hazardous materials being stored incorrectly were reported in the incident management system records.
		No unregulated disposal of greywater	Compliant	Incident management system records related to the project did not identify any instances of unregulated disposal of greywater.
		All staff inducted will be inducted to the FEMP/EMP	Compliant	MRN site induction records identified that all employees and contractors were inducted prior to or upon arrival at site and before any work commenced. Incident management system records did not identify any employees and contractors who were not inducted. Induction materials include content which deals with surface and ground water.
4	Ensure all waste streams generated in the OL area are dealt with and contained; to have minimal	No uncontrolled or unregulated release of wastes	Compliant	Incident management system records did not identify any instances of uncontrolled or unregulated release of wastes.
		No fauna access to waste	Partially Compliant	See comments in 'environment outcome 1' in relation to no fauna access to waste.
		All waste will be separated and stored appropriately.	Compliant	Area inspections / incident management records did not identify any instances where waste was not being separated and stored appropriately.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	impact on the environment	All waste not requiring routine removal will be stored in a waste management area for re-use or ultimate offsite disposal	Compliant	Area inspections records confirmed that all waste was stored appropriately in a designated waste area on site. Incident management system records did not identify any instances where waste was not stored appropriately in the designated area.
		Final waste disposal off-site	Compliant	Waste register and incident management system records did not identify any instances where on site waste required to be removed was not conducted by an appropriately licensed and approved contractor.
		All waste (quantity and type of waste) removed from site will be recorded	Compliant	All waste removed from site is recorded in a register which includes the date of removal, type of waste, whether it is listed, volume of waste, who removed it and its destination.
		Only approved waste will be burnt in a designated burn pit	Not Applicable	No waste was burnt on site therefore the EMPS was not triggered.
		Predator species and introduced fauna activity will be monitored around waste storage areas	Partially Compliant	See comments in 'environment outcome 1' in relation to no fauna access to waste.
		No increase in invasive flora, NT declared weeds or WoNS in waste disposal areas	Compliant	Weeds survey undertaken in June 2019 at MRN did identify some weeds in waste disposal areas, however these were minor and were controlled as part of regular activities.
		No unregulated disposal of NT EPA listed waste	Compliant	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 not being disposed of in accordance with the NT EPA listed waste register.
		All hazardous waste material will be separated in the appropriate area for disposal according to their SDS, and the hazardous goods register	Compliant	Regular area inspections and annual audits indicated that all hazardous waste was stored in an appropriate location near the warehouse. Incident management records did not identify any instances of hazardous waste material being stored incorrectly.
		All waste will be stored in appropriately banded areas	Compliant	Area inspections and incident management records during the reporting period did not identify any waste no being stored appropriately banded areas.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Waste will be managed according to the waste reduction hierarchy	Compliant	Discussion with site management and procurement indicated that efforts are continuously being made to reduce material imported to site and measures to re-use where possible or separation for recycling. Efforts are made on site to minimise the use of 'single' use water bottles with reusable drink bottles provided and used where practical.
		No waste found outside of designated areas	Compliant	Area inspection and incident management system records did not identify any waste being stored outside of designated areas.
		No accumulation of waste in vehicles	Compliant	Vehicle pre-start checklist prompt drivers to check to ensure vehicles are clean. A review of checklists conducted did not indicate any accumulated waste in vehicles.
		No contamination to soil from liquid waste containers	Compliant	Area inspection and incident management system records did not identify any instances of liquid waste containers leaking and contaminating soil.
		Clean-up / spill kits will be provided in all relevant areas	Compliant	Area inspections records confirmed that clean up and spill kits were located in appropriate areas across site. Incident management records did not identify any spill kits which were incomplete or missing.
		All clean up material will be appropriately disposed of for ultimate off-site disposal	Compliant	Incident management system and waste management records identified that any clean up material was appropriately managed either being transferred to an onsite bio pit or if required disposed of off-site.
		All spills and/or leaks are remediated as soon as possible	Compliant	Incident management system records identified that all spills and leaks were remediated as soon as possible.
		All spills and leaks are reported to the regulator as required	Compliant	Incident management system records did not identify any spills or leaks which required reporting to the regulator, however several minor spills and leaks were identified. All of the spills and leaks were remediated in accordance with the NEMP guidelines.
		No unregulated disposal of wastes	Not Applicable	CP is currently in the process of determining if a waste discharge licence is required for Mereenie as no waste is discharged to a water source. However, based on guidance from the NT EPA, CP is in the process of applying for an Environment Protection Licence.
		All staff, visitors and contractors will be inducted to the MRN FEMP	Compliant	MRN site induction records identified that all employees and contractors were inducted prior to or upon arrival at site and before any work commenced. Incident management system records did not identify any employees and contractors who were not inducted. Induction materials included waste management content.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
5	Minimise the adverse effects on air quality and noise to surrounding receptors from the operation in the OL area	No uncontrolled release of gas	Partially Compliant	Incident management system records identified two incidents involving uncontrolled release of gas into the atmosphere which were reported at the time of the incident: 1. On 3 April 2019 at EM15 an insulation gasket failure resulting in an uncontrolled release of gas which was quickly shut off and subsequently rectified. 2. On 17 January 2020 at the CTP a threaded fitting on the export compressor suction header was found to be leaking resulting in an uncontrolled release of gas. Soon after, the leak was isolated, and the fitting replaced.
		No unauthorised flaring of gas	Not Applicable	Incident management system records did not identify any instances of unauthorised flaring of gas. The flaring of gas is an approved activity at Mereenie therefore the EPS was not triggered.
		No open flames or fires outside of designated areas	Compliant	Incident management system / routine inspection records did not identify any specific instances of open flames outside of designated areas.
		Smoking restricted to designated areas	Compliant	Incident management system records did not identify any instances of smoking outside of designated areas.
		Emissions of greenhouse gases and fugitive emissions will be minimised	Compliant	Emissions of greenhouse gases and fugitive emissions are captured and reported in under the National Greenhouse and Energy Reporting Act. Efforts are made on site to minimise emissions where practical such as limiting vehicle journeys.
		Noise complaints will be minimised	Compliant	Incident management system records did not identify any instances of noise complaints. There are no neighbours close to site, but CP as detailed in their stakeholder engagement records proactively engagement with stakeholders and interested parties.
		Consult with and record engagement with stakeholders any potential impacts to air and noise quality.	Not Applicable	No increased noise or air quality issues as a result of operations was recorded therefore the EPS was not triggered.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		All vehicles will be serviced to vehicle manufacture specifications and frequency and registered in accordance with NT motor vehicle registry regulations and workplace health and safety regulations	Compliant	The maintenance management system captured all CP controlled vehicles and their maintenance records e.g. preventative maintenance schedules and executed activities. No overdue maintenance activities were identified. All vehicles used at MRN had the appropriate registration either pastoral or road.
		No decrease in air quality due to fires	Not Applicable	Incident management system records did not identify any fires on site therefore the EPS was not triggered.
		Only approved waste will be burnt in a designated burn pit	Not Applicable	No waste was burnt on site therefore the EMPS was not triggered.
		All staff will be inducted to the MRN FEMP	Compliant	MRN site induction records identified that all employees and contractors were inducted prior to or upon arrival at site and before any work commenced. Incident management system records did not identify any employees and contractors who were not inducted. Induction materials include air quality and noise content.
6	Minimise the adverse effect on people (injury or death), infrastructure and the surrounding receptors from fire, either caused by operations in the OL area or natural causes	No open flames or fires outside of designated areas	Compliant	Incident management system / routine inspection records did not identify any instances of open flames or fires outside of designated areas.
		No smoking outside of designated areas	Compliant	Incident management system records did not identify any instances of smoking outside of designated areas.
		Firefighting equipment will be available and serviced as per manufacturer specifications	Partially Compliant	Incident management system records identified one instances where several fire extinguishers in the CTP were overdue for inspections. This was identified, rectified and the extinguishers remained compliant for the duration of the reporting period.
		SDS will be available and appropriate firefighting equipment next to all flammable material stores.	Compliant	Copies of SDS are kept for any hazardous material used or stored on site both hardcopies and electronically. Area inspections confirmed that firefighting equipment was available across site.
		Staff will be trained in the use of firefighting equipment	Compliant	Training records confirmed that all field-based personnel have received fire extinguisher training.
		Existing and new fire breaks will be maintained to keep at least 4m clear around all infrastructure or at low vegetation cover (<10cm)	Compliant	Area inspections records confirmed that fire breaks were maintained to keep at least 4m clear around all infrastructure. If any remediation was identified work orders were raised and completed.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		No petrol vehicles on site	Compliant	Incident management system records did not identify any instances where petrol vehicles were on site.
		No combustible material will be stored or transported within 25m of the flare pit	Compliant	Area inspections / incident management system records did not identify any instances of combustible material being stored or transported within 25m of the flare pit.
		Volumes of gas flares will be minimised where possible	Compliant	The volume of gas flared is monitored and recorded in the daily production reports. Flaring is minimised through proactive production management to nominated sales volumes as well to reinjection of excess gas into the reservoir.
		Gas will undergo complete combustion when flared	Compliant	Regular area inspections which include the flare pit did not identify any contamination from unburnt fuel or external incidents. Daily visual inspections did not identify any unplanned incidents of the flame not being lit.
7	Ensure all heritage and culturally significant sites (registered or unregistered) are identified and protected within the OL area	No unauthorised third-party access	Not Applicable	The incident management system did not identify any incidents of unauthorised site access therefore the EPS was not triggered.
		No unauthorised clearing	Not Applicable	No clearing was required or undertaken during the reporting period, all activities were undertaken within previously cleared areas, therefore, the EPS was not triggered.
		No illicit drugs and alcohol on site	Compliant	A review of incident management system and records of routine testing did not identify any incidents or positive tests.
		No unauthorised firearms on site	Compliant	Incident management records did not identify any unauthorised firearms on site and the results of regular audits during the reporting period confirmed that the firearms on site are being managed in accordance with standards.
		No impact to cultural heritage sites	Compliant	Incident management records did not identify any incidents which impacted cultural heritage sites.
		Traditional owners will be allowed to access the site at any time	Not Applicable	Site access records did not identify any specific non-employee TO visits to site, therefore, the EPS was not triggered.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		All staff will be inducted to the MRN FEMP.	Compliant	MRN site induction records identified that all employees and contractors were inducted prior to or upon arrival at site and before any work commenced. Incident management system records did not identify any employees and contractors who were not inducted. Induction materials include content which deals with heritage and culturally significant sites.

### 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 DENR 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	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	MRN is currently an operational site and the EMP is still in force.
2	EMP s12 Stakeholder Consultation Schedule 1 Item 9(2)	Interest holders are required to conduct future engagement with stakeholders, in accordance with the description in the EMP.	Compliant	CP conducted regular engagement with stakeholders during the reporting period with the details and outcomes recorded in the MRN stakeholder communications log.

No	Reference	Requirement	Compliance Status	Evidence
3	EMP s 10 Reporting Reg 33	DENR is notified of reportable incidents within 2 hours of the interest holder becoming aware of the incident, or within 2 hours of the incident occurring. A written report must be provided within 24 hours if the initial report was made orally.	Not Applicable	CP did not have any reportable incidents as a result of the activities outlined in the EMP.
4	EMP s 10 Reporting Reg 34	Reports on reportable incidents are to be provided to DENR as soon as practicable and within 72 hours of the event occurring. A final report must be provided to DENR within 30 days after remediation/clean-up of the affected area.	Not Applicable	CP did not have any reportable incidents as a result of the activities outlined in the EMP.
5	EMP s 10 Reporting Reg 35	A written report of all recordable incidents must be provided to DENR not later than 15 days after the 90-day reporting period (unless otherwise agreed).	Compliant	All recordable incidents reports were submitted as required in June, September, December 2019 and March 2020.
6	Reg 37A	A report about flowback fluid from hydraulic fracturing must be provided to the Minister within 6 months of the flowback occurring.	Not Applicable	The regulated activity did not include hydraulic fracturing.
7	Reg 37B	A report about produced water from hydraulic fracturing must be provided to the Minister within 6 months of the produced water being extracted.	Not Applicable	The regulated activity did not include hydraulic fracturing.
8	Schedule 1, item 12	Interest holder must notify the Minister, occupier of the land and owner of the land on which the activity is to be carried out before commencement of activity.	Not Applicable	No construction, drilling or seismic survey activities were conducted, therefore no notification necessary.

No	Reference	Requirement	Compliance Status	Evidence
9	EMP s 8, Table 8-6 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 at MRN including was undertaken as per the National Greenhouse and Energy Reporting Act and was submitted in September 2019.
10	EMP s 10 Monitoring and Reporting Schedule 1, item 11(2)	Environmental report to be submitted to DPIR / DENR annually	Partially Compliant	An audit was undertaken and reported in August 2019 of the regulated activities and assessed against the environmental objectives and performance standards in the FEMP. All corrective actions were captured and have been or are being addressed. This report was not provided to the regulator at the time of the review but has subsequently been provided to DENR.
11	Environment Protection and Biodiversity Conservation Act 1999 (Cth) s 199, s 214, s 256	If a person who undertakes an activity that results in the unintentional death, injury, trading, taking, keeping or moving of a member of a listed threatened species (except a conservation dependent species), a member of a listed threatened ecological community, all cetacean (whale, dolphin or porpoise) species, a member of a listed migratory species, or a member of a listed marine species in or on a Commonwealth area and the activity was not authorised by a permit, then Secretary of the Department must be notified within 7 days of the person becoming aware of the results of the activity.	Not Applicable	No notification necessary as CP did not have any instances of an unintentional death, injury, trading, taking, keeping or moving of a member of a listed threatened species (except a conservation dependent species), a member of a listed threatened ecological community, all cetacean (whale, dolphin or porpoise) species, a member of a listed migratory species, or a member of a listed marine species in or on a Commonwealth area and the activity was not authorised by a permit.

No	Reference	Requirement	Compliance Status	Evidence
12	National Environment Protection (National Pollution Inventory) Measure 1998 (Cth) s 9 Waste Management and Pollution Control Act 2003 (NT)	The occupier of each reporting facility is to be required to provide information to the NPI if a reporting threshold for a substance is exceeded	Not Applicable	No reporting necessary as CP did not have any substances where thresholds were exceeded.
13	Bushfires Management Act 2016 (NT) s 90	If the owner or occupier of the land is unable to control a fire on the land, the owner or occupier must take all reasonable steps to notify a fire control officer or fire warden, and the occupier of any land to which the fire is likely to spread or a person apparently over the age of 16 years present on that land	Not Applicable	No notification necessary as CP did not have any uncontrolled fires on site.
14	Environment Protection Act 2019 (NT) div 8	Duty to notify the NT EPA as soon as practicable but within 24 hours of any incident which occurs which causes or threatens to cause material or significant environmental harm	Not Applicable	No notification necessary as CP did not have any incidents which caused or threatened to cause material or significant environmental harm as a result of the activities outlined in the EMP.
15	Territory Parks and Wildlife Conservation Act 1976 (NT) s 49	The Director may, by notice in writing require the owner or occupier of land in a feral animal control area to undertake the measures specified in the notice for the control or eradication of feral animals on the land	Not Applicable	No notice provided by the Minister.

No	Reference	Requirement	Compliance Status	Evidence
16	Waste Management and Pollution Control Act 1998 (NT) s 14	Duty to notify the NT EPA as soon as practicable but within 24 hours of any incident which occurs which causes or threatens to cause pollution resulting in material or significant environmental harm	Not Applicable	No notification necessary as CP did not have any incidents which caused or threatened to cause pollution resulting in material or significant environmental harm as a result of the activities outlined in the EMP.
17	Weeds Management Act 2001 (NT) s 29	When given notice by the Minister, land occupiers and landowners have a duty to notify the Minister of the presence of a plant, declared weed or potential weed on the land within the time specified in the notice	Not Applicable	No notice provided by the Minister.

## 3.0 Summary of Compliance

### 3.1 Overview of Compliance

Table 3-1 provides a summary of the results of the compliance assessment against the 101 total compliance items.

**Table 3-1 Compliance Summary**

Compliance Indicator	Number	Percentage
Compliant	59	58%
Partially Compliant	10	10%
Non-Compliant	0	0%
Not Applicable	32	32%

### 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

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

**Table 3-2 Partially Compliant Environmental Performance Standards**

Description	Potential environmental harm or impact	Corrective actions
During a routine inspection light vehicle wheel tracks were identified as having driven off road across the lease and not on designated access tracks.	Zero actual environmental harm as the identified tracks were walked post incident and no damage to vegetation was identified	An investigation identified that the off-road tracks were not as a result CP personnel or vehicles, therefore it is presumed to be a member of the public.  Communication went out to all personnel regarding off road driving and the need to be vigilant when driving around the lease.
Two instances where bins were not adequately secured, and a dingo gained access.	Zero environmental harm or impact as: - No recorded increase is pest species post events. - Dingos were not harmed.	All bins were assessed and several bins with lids which did not fully close were removed from site and replaced.  Modified bin access area including installation of a self-closing gate.

Description	Potential environmental harm or impact	Corrective actions
<p>Several minor spills and leaks were identified. All of the spills and leaks were remediated in accordance with the NEMP guidelines.</p>	<p>Zero environmental harm or impact as:</p> <ul style="list-style-type: none"> <li>- all of the spills and leaks were remediated in accordance with the NEMP guidelines.</li> <li>- contaminated material was appropriately disposed of in bio pits or taken offsite.</li> </ul>	<p>There is an ongoing pipework integrity review and rectification works being undertaken across the CTP and ESS facilities are MRN.</p> <p>Routines inspections are now more frequent and specifically target high risk areas where leaks and spills can occur.</p>
<p>Groundwater extraction records were recorded, and water quality testing were undertaken however planned static water level monitoring was not completed as planned over the reporting period as part of regular bore monitoring activities.</p>	<p>Zero actual impacts / minor potential impacts such as aquifer depletion however the full extent of any impacts will take time to determine. Additionally, there are no clearly defined groundwater dependant ecosystems present.</p>	<p>Schedule bi-annual SWL inspections to coincide with water sampling in the maintenance management system and records and monitor the results.</p>
<p>Two incidents of uncontrolled release of gas into the atmosphere due to asset integrity issues at:</p> <ol style="list-style-type: none"> <li>1. EM15 as a result of an insulation gasket failure.</li> <li>2. the CTP as a result of a threaded fitting on the export compressor suction header was found to be leaking</li> </ol>	<p>Zero environmental harm or impact as:</p> <ul style="list-style-type: none"> <li>- gas is lighter than air and it dissipated quickly into the atmosphere.</li> <li>- an inspection of the area and post incident did not identify any further impacts as a result of the integrity issues.</li> </ul>	<ol style="list-style-type: none"> <li>1. EM15 Immediate: controlled shutdown of the ESS and EM North and South flank loop flowlines. Follow Up: All similar gaskets across all CP fields were identified and scheduled for replacement.</li> <li>2. CTP Immediate: CTP was shutdown, whilst the leak was isolated, and the fitting replaced. Follow Up: Ongoing pipework integrity review and rectification works are being undertaken across the CTP and ESS facilities are MRN.</li> </ol>
<p>Several fire extinguishers in the CTP were overdue for inspection. This was identified, rectified and the extinguishers remained compliant for the duration of the project.</p>	<p>Zero environmental harm or impact as:</p> <ul style="list-style-type: none"> <li>- the extinguishers are for emergency use and they were never discharged during the project.</li> </ul>	<p>All fire extinguishers in the plant were checked and any overdue for inspection were recertified by an external service provider.</p> <p>All fire equipment is now scheduled to regular checks in our maintenance management system.</p>

### 3.2.2 Regulatory Reporting

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

**Table 3-3 Partially compliant reporting requirements**

Description	Potential environmental harm or impact	Corrective actions
Although an audit was undertaken in August 2019 of the regulated activities which assessed compliance with environmental objectives and performance standards in the FEMP. This report was not provided to DENR at the time of the review.	No environmental harm as: - an audit was undertaken, and corrective actions implemented. - this is an administrative control.	The report has subsequently provided to DENR. Environmental compliance and the reporting of results will be scheduled in Central's work management system and tracked.

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

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

- Knowledge and understanding on the specific requirements to document waste management activities.

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

- Continued proactive communication with regulators;
- Developed a more robust process to track compliance and regular reviews to align with EMP commitments and regulatory requirements; and
- Align requirements across open EMPs to ensure standards are aligned where possible