

The Leading Helium Explorer


Annual Environmental Performance Report

15 December 2021 – 15 December 2022

Peak Helium Pty Ltd

2021 Seismic Exploration Environment Management Plan EP 134

Document title	Annual Environment Performance Report
EMP title	2021 Seismic Exploration Environment Management Plan EP134 (PKH1-6)
Exploration Permit/Licence Number	Exploration Permit 134
Interest holder details	Peak Helium Pty Ltd Suite 2 Level 6 12 Creek Street Brisbane QLD 4000 ABN 65654263804
Operator details	Peak Helium Pty Ltd

Signature and Certification	
I certify on behalf of Peak Helium this document is a true and accurate record of performance.	
Signature	
Position	Adam Becis – Chief Operating Officer
Date	24 May 2023

Acronyms / Terms	Definition
AEPR	Annual Environment Performance Report
Code	Code of Practice: Onshore Petroleum Activities in the Northern Territory
DEPWS	Department of Environment, Parks and Water Security (NT)
DITT	Department of Industry, Tourism and Trade (NT)
EMP	Environment Management Plan
EP	Exploration Permit
NT	Northern Territory
Regulations	Petroleum (Environment) Regulations 2016 (NT)
SOCS	Site of Conservation Significance

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1. Introduction

The Northern Territory (NT) Petroleum (Environment) Regulations 2016 (NT) (the Regulations) require an interest holder to provide a report to the Minister for Environment on an annual basis that outlines the environmental performance of the interest holder¹ (the Annual Environment Performance Report). The report 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 the conduct of the regulated activity.

This Annual Environmental Performance Report (AEPR) outlines the environmental performance of Peak Helium Pty Ltd in respect to achieving the environmental outcomes and environmental performance standards, and monitoring, recording, and reporting requirements described within:

- 2021 Seismic Exploration Environmental Management Plan (EMP) EP 134, approved on the 15th of December 2021. Hereafter referred to as the EMP.

The period covered by this AEPR is from 15 December 2021 to 15 December 2022, inclusive.

An illustration of the predicted and actual timing of conduct of the regulated activities is presented in Table 1.

Table 1 – Timing of Regulated Activities

Activity	Predicted Duration	Proposed Dates	Actual Duration	Actual Dates
2D Seismic line clearing, survey and pointing	3 weeks duration	January 2022	2 weeks	10 th January – 20 th January 2022
2D Seismic data acquisition	3 weeks duration	January 2022	3 weeks	24 th January – 11 th February 2022
2D Seismic line rehabilitation	1 week duration	February 2022	1 week	Mid-February 2022

1.1 Background

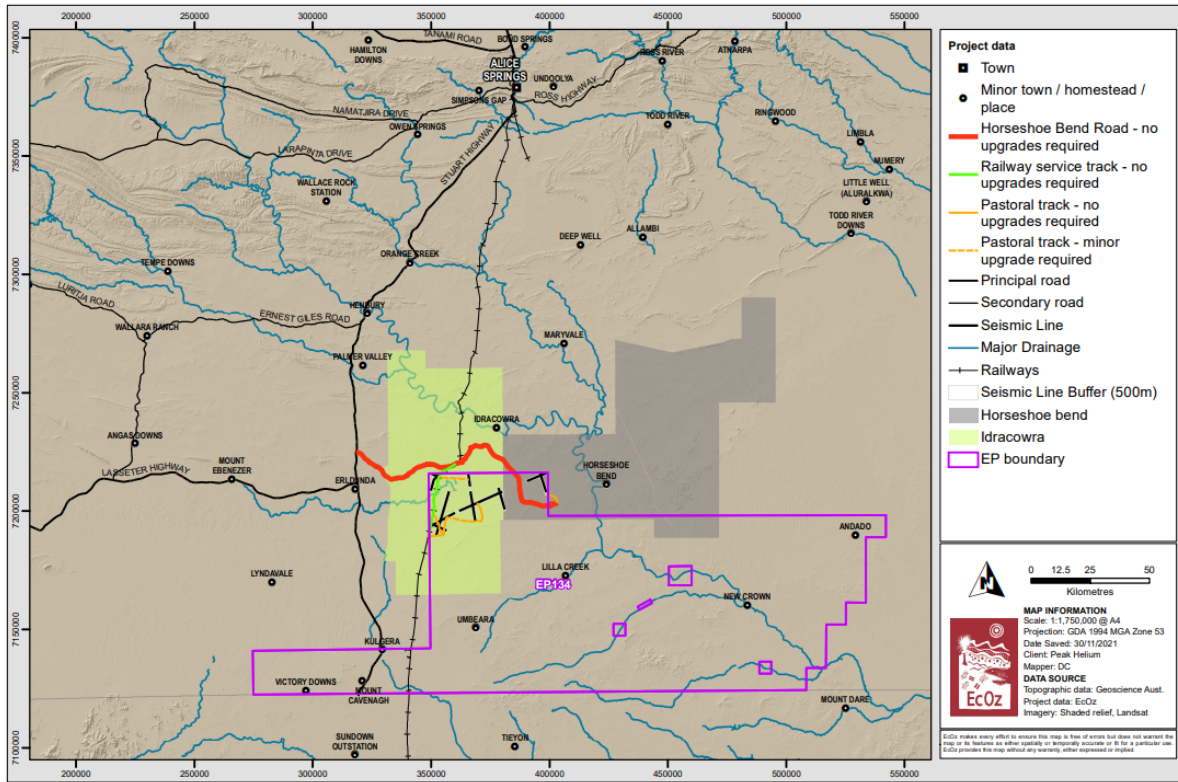
The approved regulated activities within EP 134 relevant to this AEPR are as follows:

- 8 ha of vegetation clearing prior to survey, with vegetation stockpiled for use in rehabilitation.
- 120km of 2D vibroseis seismic survey, comprised of eight survey lines.
- Use of existing access routes including Horseshoe Bend Road, Stuart Highway, Railway Service Track and Pastoral Station Tracks.
- Rehabilitation of cleared vegetation to promote regeneration.
- Establishing of photo points to monitor rehabilitation.
- Removal of all surface infrastructure.

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

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

Figure 1 – Location of seismic lines within EP134



1.2 Contents of Performance Report

This AEPR describes the environmental performance of Peak Helium Pty Ltd by evaluation of the following:

1. Compliance with Ministerial approval conditions, for each 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.

1.3 Assessment of Performance

Table 2 shows the performance status indicators used in this AEPR.

Table 2 – Performance Descriptors

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

1.4 Evidence of Performance

The following sources of evidence are used to demonstrate compliance:

- Internal assessment of compliance through verification of:
- Daily and weekly monitoring inspections during regulated activities, as committed to in the EMP
- Inductions
- Landholder consultation records
- Site Photographs
- GIS log track data
- Terrex Seismic Peak Helium Project Final Report
- Weed Hygiene Declaration Forms
- Toolbox Meetings

2. Demonstration of Performance

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

Table 3 – Compliance with Ministerial EMP Approval Conditions

No	Ministerial Condition	Performance Status	Evidence
1	The interest holder must provide an annual report to the department on its environmental performance, via onshoregas.depws@nt.gov.au , in accordance with item 11(1)(b) in schedule 1 of the Petroleum (Environment) Regulations 2016, noting:		
	i. Each report must align with the template and Onshore Petroleum Annual Environment Performance Report Guideline.	Compliant	This AEPR aligns with the template and Onshore Petroleum Annual Environment Performance Report Guideline.
	ii. The first report must incorporate interest holder performance during the 12-month period from the date of the approval and be provided within 90 days of the end of the reporting period.	Not Compliant	The first AEPR report was due on 15 th March 2023 and not submitted within 90 days at the end of the reporting period.
	iii. A report must be provided each year until such time a notification is made to the Minister under regulation 14 that the activity is complete, or until the EMP is revised and re-approved.	Compliant	Peak Helium have appointed experienced tenement managers UTM Global who will make sure future key dates are kept for compliance including all DEPWS matters.
	iv. Reports must accurately reflect outcomes of inspections, audits and regulatory compliance notices.	Compliant	This AEPR accurately reflects outcomes of inspections, audits and regulatory compliance notices.
2	To support clause A.3.9 of the Code of Practice: Onshore Petroleum Activities in the Northern Territory the interest holder must, within 90 days of the approval date, provide to the department via onshoregas.depws@nt.gov.au , an updated rehabilitation plan, which		
	i. Aligns with the DEPWS Rehabilitation Plan Guide for Surface Disturbance.	Not Compliant	Updated rehabilitation plan submitted to onshoregas.depws@nt.gov.au on Friday 2 nd September 2022 that aligns with the DEPWS Rehabilitation Plan Guide for Surface Disturbance.

No	Ministerial Condition	Performance Status	Evidence
	ii. Includes a timeframe for establishment of reference sites for each vegetation type cleared during conduct of the regulated activity.	Not Compliant	Timeframe for establishment of reference types included in Section 5 of Rehabilitation Plan EP 134 Seismic Survey 2021/2022
	iii. Includes a commitment to provide to the department via onshoregas.depws@nt.gov.au an annual rehabilitation report 90 days after the anniversary of the approval date each year, that: Summarises progressive rehabilitation progress. Summarises the outcomes of annual rehabilitation monitoring of cleared areas against reference sites. Summarises maintenance activities and corrective actions taken to improve rehabilitation outcomes. Includes geospatial files for areas under rehabilitation.	Not Applicable	Annual rehabilitation report not due within reporting period 15/12/2021 – 15/12/2022 of this AEPR.
	iv. Includes a commitment to commence progressive rehabilitation no later than 12 months following cessation of the regulated activity at each location cleared of vegetation.	Not Compliant	Commitment to commence progressive rehabilitation no later than 12 months following cessation of the regulated activity included in Section 2.2 of Rehabilitation Plan EP 134 Seismic Survey 2021/2022
	v. Includes the requirement to continue annual monitoring of rehabilitated areas until comparison with analogue sites indicates defined success criteria are met.	Not Compliant	Annual monitoring included in Section 5 of Rehabilitation Plan EP 134 Seismic Survey 2021/2022.
3	For the avoidance of doubt, the interest holder must not undertake any regulated activity described in this EMP on land outside of EP134.	Compliant	No activities were undertaken on land outside of EP134.

Table 4 provides a systematic overview of Peak Helium's performance against the environmental outcomes and environmental performance standards within the approved EMP.

Table 4 – Compliance with Environmental Outcomes and Environmental Performance Standards

No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
1	No clearing outside the proposed seismic survey area.	All clearing in approved areas only. Code of Practice for Petroleum Activities in the Northern Territory Part A – Surface Activities. NTG Land Clearing Guidelines 2019.	Compliant	GIS log track data. Site photographs.
2	No disturbance to high conservation areas.	All clearing in approved areas only. Code of Practice for Petroleum Activities in the Northern Territory Part A – Surface Activities. NTG Land Clearing Guidelines 2019.	Compliant	GIS log track data. GPS guidance files.
3	Reduce impact to significant vegetation.	All clearing in approved areas only. Code of Practice for Petroleum Activities in the Northern Territory Part A – Surface Activities. NTG Land Clearing Guidelines 2019.	Compliant	GIS log track data. GPS guidance files.
4	No soil erosion and discharge of sediment or soil into waterways or established drainage systems.	No evidence of active erosion. Code of Practice for Petroleum Activities in the Northern Territory Part A – Surface Activities. International Erosion Control Association (IECA) Best Practice for Erosion and Sediment Control (2008). NTG Land Clearing Guidelines 2019.	Compliant	Crossing were selected at lowest erosion risk location and ESCP controls adhered to, in order to minimise erosion development. Visual inspection and monitoring of existing tracks and seismic lines during siting of seismic lines. Visual inspections of creek and drainage line crossings weekly and after a rainfall event during regulated activities.

No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
5	Minimised fauna deaths.	No fauna deaths reported. Code of Practice for Petroleum Activities in the Northern Territory Part A – Surface Activities. NTG Land Clearing Guidelines 2019.	Compliant	Site photographs. Zero animals injured as per Terrex Seismic Peak Helium Project Final Report Table 35.
6	No prohibited access to, or disturbance of, cultural heritage, inclusive of Sacred Sites, and Indigenous and non-Indigenous heritage sites.	No sacred sites/heritage damages. AAPA Certificate and conditions outlined on the certificate. NT Heritage Act. Code of Practice for Petroleum Activities in the Northern Territory Part A – Surface Activities.	Compliant	Terrex Seismic Peak Helium Project Final Report Section 3.3 and 3.7. Access tracks avoided RWA4.
7	Minimise environmental nuisance at sensitive receptors.	No significant dust plumes identified, no complaints from surrounding landholders. Code of Practice for Petroleum Activities in the Northern Territory Part A – Surface Activities.	Compliant	Activity audits undertaken weekly and results recorded along with any photographs. Stakeholder Engagement log.
8	Minimise nuisance noise on surrounding communities or exploration workers.	No complaints from surrounding landholders.	Compliant	Stakeholder Engagement log.
9	Minimise disruption to fauna and stock.	No complaints from surrounding landholders. Code of Practice for Petroleum Activities in the Northern Territory Part A – Surface Activities. NTG Land Clearing Guidelines 2019.	Compliant	Stakeholder Engagement log.
10	Minimise greenhouse gas emissions.	Alignment with Code of Practice for Petroleum Activities in the Northern Territory Part A – Surface Activities	Compliant	Clearing records confirm no additional clearing was undertaken during regulated activities.
11	No spreading of weeds within the seismic survey area.	No weed spread.	Compliant	Weed hygiene declaration inspections undertaken.

No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
12	Minimise nuisance vibration on surrounding communities or exploration workers.	No complaints from surrounding landholders.	Compliant	Stakeholder Engagement log.
13	No reports of trespass during work activities.	No complaints from surrounding landholders.	Compliant	Stakeholder Engagement log. Access through existing gates as per Terrex Seismic Peak Helium Project Final Report Section 2.5.
14	Minimise unwanted access to project area.	No complaints from surrounding landholders.	Compliant	Stakeholder Engagement log. Access through existing gates as per Terrex Seismic Peak Helium Project Final Report Section 2.5.
15	Minimise track impacts and erosion.	No evidence of active erosion. Code of Practice for Petroleum Activities in the Northern Territory Part A – Surface Activities. International Erosion Control Association (IECA) Best Practice for Erosion and Sediment Control (2008). NTG Land Clearing Guidelines 2019.	Compliant	Visual inspection and monitoring of existing tracks during siting of seismic lines. Visual inspections of creek and drainage line crossings weekly and after a rainfall event during regulated activities. Site photographs demonstrating no new erosion created during regulated activities.
16	Spreading exotic species and plant diseases into or exported from the exploration permit area is avoided.	Weed inspections identify and control weeds.	Compliant	Weed hygiene declaration inspections undertaken for all machinery and vehicles entering the works area.
17	Any identified weeds are treated in accordance with the Weed Management Plan.	Alignment with Weed Management Planning Guide: Onshore Petroleum Projects.	Not Applicable	Scouting of the lines undertaken by Operating Company Representative during regulated activities and no weeds were identified as per documented Toolbox Meetings.
18	Minimise environmental nuisance from dust at sensitive receptors.	No significant dust plumes identified, no complaints from surrounding landholders. Code of Practice for Petroleum Activities in the Northern Territory Part A – Surface Activities.	Compliant	Stakeholder Engagement log.

No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
19	No increase in the spread of existing feral animal and pest species as result of exploration activity.	No observed pest presence.	Compliant	No evidence of feral animals and pest species in documented Toolbox Meetings.
20	Prevent introduction of feral animals and pest species.	No introduction of pest species detected.	Compliant	No evidence of feral animals and pest species in documented Toolbox Meetings.
21	No impacts on soil, surface water, groundwater, sensitive habitat and air quality.	No off-site releases of chemicals or hydrocarbons. No accidental on-site release of chemicals or hydrocarbons.	Compliant	Visual inspection of fuel and chemical storage areas, including containment areas and structures, containers, and spill kits. Service truck Daily Pre-start documentation.
22	No ground surface contamination or spill incidents.	Spills cleaned up immediately.	Compliant	No ground surface contamination or spill incidents as per Terrex Seismic Peak Helium Project Final Report Section 5.
23	No soil erosion and discharge of sediment or soil into waterways or established drainage systems.	No evidence of active erosion within 12 months of works completion. Code of Practice for Petroleum Activities in the Northern Territory Part A – Surface Activities. International Erosion Control Association (IECA) Best Practice for Erosion and Sediment Control (2008). NTG Land Clearing Guidelines 2019.	Compliant	Visual inspection of existing tracks, seismic lines, and waterway crossings during siting of seismic lines (baseline assessment) and completion of key phases of activity. Routine visual inspections of the creek and drainage line crossings occurring weekly or following a rainfall event (i.e. greater than 20 mm in a 24-hour period) during regulated activities.
24	No new instances of erosion and sedimentation.	No evidence of active erosion within 12 months of works completion. Code of Practice for Petroleum Activities in the Northern Territory Part A – Surface Activities. International Erosion Control Association (IECA) Best Practice for Erosion and Sediment Control (2008). NTG Land Clearing Guidelines 2019.	Compliant	Visual inspection of existing tracks, seismic lines, and waterway crossings during siting of seismic lines (baseline assessment). Routine visual inspections of the creek and drainage line crossings occurring weekly or following a rainfall event (i.e. greater than 20 mm in a 24-hour period) during regulated activities.

No	Environmental Outcome	Environmental Performance Standard	Performance Status	Evidence
25	No impact to landholders or cattle.	No complaints.	Compliant	Stakeholder Engagement log. Access through existing gates as per Terrex Seismic Peak Helium Project Final Report Section 2.5.
26	No interference with pastoral activities.	No complaints.	Compliant	Stakeholder Engagement log. No complaints as per Terrex Seismic Peak Helium Project Final Report Table 35.
27	No complaints regarding increased traffic.	No complaints.	Compliant	Stakeholder Engagement log. No complaints as per Terrex Seismic Peak Helium Project Final Report Table 35.
28	No fires caused by site activities.	No fires. Compliance with Appendix F Bushfire Management Plan.	Compliant	Daily monitoring for bushfire alerts. Toolbox meeting records notifying all site personnel of the risks of fire. Incident reports (none for fire) as per Terrex Seismic Peak Helium Project Final Report Table 35.
29	Conservation of Site of Conservation Significance (SOCS).	No damage to Site of Conservation Significance (SOCS).	Compliant	Visual inspection and monitoring of existing pastoral property tracks (when traversing through SOCS) during siting of seismic lines (baseline assessment). No damage to SOCS as per Terrex Seismic Peak Helium Project Final Report Table 35.
30	Disturbed areas returned to pre-disturbance condition.	Rehabilitation monitoring condition returned to level as identified in pre-disturbance site assessments.	Not Applicable	Rehabilitation still actively being undertaken. Confirmed with ecologist that rehabilitation monitoring is currently occurring (as of email from EcOz ecologist Tom Reilly 26 th of April 2022) with report to soon follow.

Table 5 demonstrates Peak Helium's compliance with reporting requirements in the Code of Practice: Onshore Petroleum Activities in the Northern Territory (Code of Practice) and interest holder's compliance with reporting and monitoring requirements under the Petroleum (Environment) Regulations 2016 (NT) schedule 1, item 11(2), which requires the EMP to include all information required to be recorded, monitored or reported. Where relevant, Peak Helium has also confirmed that all records, monitoring or required reporting under the Petroleum (Environment) Regulations 2016 (NT), or under a commitment made in the EMP, has been provided to DEPWS or the relevant NTG agency.

Table 5 – Compliance with Reporting and Monitoring Requirements

No	Reference	Requirement	Performance Status	Evidence
1	Code cl A.3.5 EMP s3.1	Geospatial information depicting areas cleared is to be provided to the Minister.	Compliant	Geospatial files of the land disturbance footprint were submitted via DEPWS Teams site by Project Manager Jon Bennett.
2	Code cl A.3.6 (b) EMP s7.3 Appendix E	Weed management plan developed as part of the EMP must provide for ongoing weed monitoring.	Compliant	Section 7 of Appendix E confirms that weed monitoring will be ongoing during seismic operations.
3	Code cl A.3.7(a)vi EMP Table 6.7	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	EMP Table 6.7 confirms annual fire mapping to occur to monitor changes to fire frequency in the relevant areas. Mapping last occurred July 2022.
4	Code cl A.3.9(c) Code cl A.3.9(e) Appendix I Rehabilitation Plan	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.	Compliant	Commitment to commence progressive rehabilitation no later than 12 months following cessation of the regulated activity included in Appendix I Section 2.2 of Rehabilitation Plan EP 134 Seismic Survey 2021/2022.
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):	Not Applicable.	No hydraulic fracturing was undertaken under this EMP relevant to the AEPR.

No	Reference	Requirement	Performance Status	Evidence
		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.		
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 occurred under this EMP relevant to the AEPR.
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 DITT.	Not Applicable.	No new barriers or well operating envelopes occurred under this EMP relevant to the AEPR.
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 petroleum wells were decommissioned under this EMP relevant to the AEPR.
9	Code cl C.3(e) Appendix G Waste Management Plan Appendix H Spill Response Management Plan	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.	No spills occurred during regulated activity as per Terrex Seismic Peak Helium Project Final Report Section 5.

No	Reference	Requirement	Performance Status	Evidence
10	Code cl C.6.1(d) Appendix G Waste Management Plan Appendix H Spill Response Management Plan	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.	No spills occurred during regulated activity as per Terrex Seismic Peak Helium Project Final Report Section 5.
11	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.	No wastewater generation occurred under this EMP relevant to the AEPR.
12	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 or well construction occurred under this EMP relevant to the AEPR.
13	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 natural gas was vented or flared under this EMP relevant to the AEPR.
14	Reg 33 EMP Table 7.2 EMP s7.5	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 incidents as per Terrex Seismic Peak Helium Project Final Report Section 11 and Table 35.
15	Reg 34 EMP Table 7.2	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	Not Applicable.	No incidents as per Terrex Seismic Peak Helium Project Final Report Section 11 and Table 35.

No	Reference	Requirement	Performance Status	Evidence
		remediation/cleanup of the affected area.		
16	Reg 35 EMP Table 7.2	A written report of all recordable incidents must be provided to DEPWS not later than 15 days after the 90 day reporting period (unless otherwise agreed).	Not Compliant.	No incidents as per Terrex Seismic Peak Helium Project Final Report Section 11 and Table 35.
17	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 hydraulic fracturing occurred under this EMP relevant to the AEPR.
18	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 fracturing occurred under this EMP relevant to the AEPR.
19	Schedule 1, item 12 EMP Table 7.2	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, ² drilling, or seismic surveys.	Compliant	Hon. Eva Lawler, Minister for Environment and Natural Resource, emailed 23/12/21 prior to commencement of works. Louis Gomatos Senior Director, Petroleum Operations DITT emailed 15/12/21 prior to commencement of works. Landowners advised of start date on the 14 th December 2021.
20	EMP Table 7.1	Daily monitoring of local weather, climate information and bushfire alerts for duration of works.	Compliant	Weather conditions reported in Table 4 and Figure 3 of Terrex Seismic Peak Helium Project Final Report. Take 5's undertaken as per Terrex Seismic Peak Helium Project Final Report Section 11.
21	EMP Table 7.1	Daily monitoring of the 7 day forecast to determine the seismic works program around the forecasts.	Compliant	Weather conditions reported in Table 4 and Figure 3 of Terrex Seismic Peak Helium Project Final Report.
22	EMP Table 7.1	Induction records maintained to demonstrate what was covered and who was inducted.	Compliant	Induction hours recorded in Table 35 of Terrex Seismic Peak Helium Project Final Report.

² Note, civil works are also considered 'construction' activities.

No	Reference	Requirement	Performance Status	Evidence
23	EMP Table 7.1	Visual inspection and monitoring of existing tracks, seismic lines and waterway crossings during siting of seismic lines, after completion of key phases, after the wet season and annually for up to 5 years.	Compliant	Scouting of the lines undertaken by Operating Company Representative Jed Farley October 2022 with site photographs.
24	EMP Table 7.1	Weekly routine visual inspections of the creek and drainage line crossings during regulated activities.	Compliant	Visual inspection undertaken by Operating Company Representative Jed Farley during regulated activities.
25	EMP Table 7.1	Post wet season weed survey of seismic lines and access tracks recorded in accordance with the NT Weed Data Collection Guidelines.	Compliant	Confirmed with ecologist that weed survey is currently occurring (as of email from EcOZ Tom Reilly 26 th of April 2022) with report to soon follow.
26	EMP Table 7.1	Daily monitoring for bushfire alerts and notifying all site personnel of the risks of fire during toolbox meetings.	Compliant	Take 5's undertaken as per Terrex Seismic Peak Helium Project Final Report Section 11.
27	EMP Table 7.1	Weekly inspection of waste storage for the duration of works.	Compliant	Waste correctly stored for the duration of works as per Terrex Seismic Peak Helium Project Final Report Section 2.1
28	EMP Table 7.1	Maintain waste register as waste occurs, including receipts to verify waste has been properly disposed of.	Compliant	Waste correctly disposed of for the duration of works as per Terrex Seismic Peak Helium Project Final Report Section 2.1
29	EMP Table 7.1	Daily inspection of fuel and chemical storage areas, including containment areas and structures, containers, and spill kits for the duration of works.	Compliant	As per Terrex Seismic Peak Helium Project Final Report.
30	EMP Table 7.1	Complaints recorded in Complaint register and immediately followed up.	Compliant	No complaints recorded as per Terrex Seismic Peak Helium Project Final Report Table 35.
31	EMP Table 7.1	Daily Communications log with station manager and Station Personnel to monitor any potential disturbance to cattle and jointly arrive at reasonable solutions to mitigate any observed effects during regulated activities.	Compliant	Five day forecast undertaken by Operating Company Representative Jed Farley with daily reports showing communication logs.

No	Reference	Requirement	Performance Status	Evidence
32	EMP Table 7.1	Daily visual monitoring carried out to ensure that visibility for moving equipment and vehicles is not obscured during regulated activities. Water carts applied as needed.	Compliant	Site photographs showing clear visibility during regulated activities.
33	EMP Table 7.1	Record any fauna encounters, injuries or death as result of seismic survey on fauna register.	Compliant	Zero animals injured as per Terrex Seismic Peak Helium Project Final Report Table 35.
34	EMP Table 7.1	Rehabilitation monitoring at the end of the wet season, between 6-9 months post rehabilitation works, yearly for the first three years post rehabilitation works and annually until successful rehabilitation.	Compliant	Confirmed with ecologist that rehabilitation monitoring is currently occurring (as of email from EcOz Tom Reilly 26 th of April 2022) with report to soon follow.
35	EMP Table 7.1	Heritage register maintained with physical inspections of known sites flagged on primary spatial databases.	Compliant	Physical inspections of known sites flagged on primary spatial databases as per Terrex Seismic Peak Helium Project Final Report Section 3.3
36	EMP Table 7.2	Quarterly Recordable Incident Report to DEPWS	Not Compliant	Q1 1 st January – 31 st March due 15/4/22 : Not submitted. Q2 1 st April – 30 th June due 15/7/22 : Not submitted. Q3 1 st July – 30 th September due 15/10/22 : Not submitted.

3. Overall Performance

3.1 Overview of Performance

Table 6 provides a summary of the results of the compliance assessment against the 76 total compliance items.

Table 6 – Performance Summary

Compliance Indicator	Number	Percentage
Compliant	53	70%
Not Compliant	7	9%
Not Applicable	16	21%

3.2 Overview of Non-Compliant Items

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 partial 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

3.2.1.1 Description

On the 6th of April 2022, Peak Helium was notified by DEPWS that the failure to submit the Annual Environmental Performance Report in accordance with Ministerial Condition 1(i), by 15 March 2023 was a non-compliance of the conditions set out in the Minister's Approval Notice.

3.2.1.2 Analysis of Potential Environment Harm or Impact

This was an administrative non-compliance which did not have the potential to cause environmental harm or impact.

3.2.1.3 Corrective Actions

Peak Helium responded to contraventions letter L230406 via email, iterating that it has gone through an internal restructure and that some compliance matters have slipped. Peak Helium have appointed experienced tenement managers UTM Global, who will make sure all future key dates are kept for compliance including all DEPWS matters. The backdated report has been written as a matter of priority.

3.2.2 Regulatory Reporting or Record Keeping

3.2.2.1 Description

On the 6th of April 2022, Peak Helium was notified by DEPWS of the failure to submit quarterly reports about recordable incidents (since the approval date of PKH1-6) in accordance with regulation 35(1) of the Regulations.

3.2.2.2 Analysis of Potential Environmental Harm or Impact

This was an administrative non-compliance which did not have the potential to cause environmental harm or impact.

3.2.2.3 Corrective Actions

Peak Helium responded to contraventions letter L230406 via email, iterating that it has gone through an internal restructure and that some compliance matters have slipped. Peak Helium have appointed experienced tenement managers UTM Global, who will make sure all future key dates are kept for compliance including all DEPWS matters. The backdated reports have been written as a matter of priority.

3.2.3 Application of Lessons Learnt

Both non-compliance items were administrative non-compliances, related to regulatory reporting. Peak Helium acknowledges the opportunity to identify where improvements to internal processes are required to ensure future compliance. On investigation, it was determined that:

1. Internal restructures allowed for gaps within company commitments.
2. Existing tools such as activity schedules were not used to inform due dates for Ministerial approval conditions.
3. Reporting requirements were not included in a list of all conditions that were entered into the corporate compliance monitoring register.

To ensure that all Ministerial approval conditions are achieved in a timely manner in the future, the following processes have been established:

1. Internal restructures are to be reviewed to ensure there is clear communication on roles, responsibilities, and current corporate commitments.
2. Peak Helium have appointed experienced tenement managers UTM Global, who will ensure all future key dates are kept for compliance including all DEPWS matters.
3. Reporting requirements will be included in a corporate compliance monitoring register.

A higher priority has been placed upon the importance of compliance reporting within Peak Helium Pty Ltd and we are appreciative of the opportunity to restore corporate trust with the NT DEPWS.