



Annual Environmental Performance Report

Palm Valley PV-13 Connection and PV-02
Reinjection System Upgrade Environmental
Management Plan

August 2020

Document Details

Document Number:	PVL-630-REP-0001
Name of Document:	Annual Environment Performance Report
EMP's Covered	Palm Valley PV-13 Connection and PV-02 Reinjection System Upgrade Construction Environmental Management Plan
Permit	OL3
Interest Holder Details	Central Petroleum (NT) Pty Ltd, Level 7/369 Ann Street, Brisbane QLD 4000 (ABN: 95 009 718 183)
Operator Details	Central Petroleum Limited, Level 7/369 Ann Street, Brisbane QLD 4000 (ABN: 72 083 254 308)
Approved By	Ross Evans – Chief Operating Officer
Date Approved	2 September 2020

Document Control

Version	Date	Author	Description
1	7 August 2020	Cameron Lambert	Initial submission
2	2 September 2020	Cameron Lambert	Resubmission post DENR feedback

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.	
Signature	
Name	Ross Evans
Position	Chief Operating Officer
Date	2 September

Glossary

Abbreviation / Acronyms	Definition
AEPR	Annual Environment Performance Report
CoP	Code of Practice
CP	Central Petroleum Limited
DENR	Department of Environment and Natural Resources
DPIR	Department of Primary Industry and Resources
EMP	Environmental Management Plan
EPA	Environment Protection Authority
EPS	Environmental Performance Standard
FEMP	Field Environment Management Plan
GIS	Geographic Information System
HSE	Health, Safety and Environment
IECA	International Erosion Control Association
LCM	Local Community Meeting
NEPM	National Environment Protection Management
NT	Northern Territory
OL3	Operating Licence Three
PV	Palm Valley
TO	Traditional Owner

Contents

1.0	Introduction	1
1.1	Background	1
1.2	Contents of Performance Report	2
1.3	Assessment of Compliance	4
1.4	Evidence of Compliance	4
2.0	Demonstration of Compliance	5
2.1	Ministerial Approval Conditions	5
2.2	Environmental Outcomes and Environmental Performance Standards	5
2.3	Mandatory Reporting Requirements	16
3.0	Summary of Compliance	20
3.1	Overview of Compliance	20
3.2	Overview of Items Found Not Compliant or Partially Compliant	20
	3.2.1 Environmental Performance Standards	20
	3.2.2 Regulatory Reporting	21
3.3	Application of Lessons Learned Across Central Petroleum Onshore Interests	21

Figures

Figure 1-1	Dates EMP activities were conducted	1
Figure 1-2	Location of the Palm Valley Field and the PV13 connection and PV2 activity locations	3

Tables

Table 1-1	Compliance Descriptors	4
Table 2-1	Compliance with Ministerial EMP Approval Conditions	5
Table 2-2	Compliance with Environmental Outcomes and Environmental Performance Standards	5
Table 2-3	Compliance with Mandatory Reporting Requirements	16
Table 3-1	Compliance Summary	20
Table 3-2	Partially compliant environmental performance standards	20
Table 3-3	Partially compliant regulatory requirements	21

1.0 Introduction

This Annual Environment Performance Report (AEPR), as required under the Petroleum (Environment) Regulations 2019 (NT), is presented to reporting the environmental performance of Central Petroleum (CP) 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 Palm Valley (PV) Construction EMP for PV-13 Connection and PV-02 Reinjection System Upgrade, approved 1 February 2019 and any other law in force in the Northern Territory related to conduct of the regulated activity.

The AEPR covers the period from 1 February 2019 to 31 January 2020, the project was conducted in two key areas:

1. PV-13 Connection
2. PV-02 Reinjection System Upgrade

Activities under the PV-13 Connection and PV-02 Reinjection System Upgrade Construction EMP were conducted during the shaded periods shown in Figure 1-1. Outside of the shaded areas the site was managed under the approved Palm Valley Gas Field Environmental Management Plan. All activities conducted under the Palm Valley Construction EMP for PV-13 Connection and PV-02 Reinjection System Upgrade were completed in December 2019.

Activity	2019												2020
	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	
PV-13 Connection		←→											
PV-02 Reinjection System Upgrade		←→								←→			

Figure 1-1 Dates EMP activities were conducted

1.1 Background

The regulated activities conducted under the Construction EMP for PV-13 Connection and PV-02 Reinjection System Upgrade that have been assessed against performance are as follows:

- PV-13 Connection
 - Installation of approximately 800m of steel DN150 schedule 40 APU 5LX42 flowline above ground from PV-13 to PV-07
 - Installation of the pig launcher and receiver
 - Refurbishment and relocation of the surface skid from PV-09 to PV-13
 - Installation of 2 x 30kL HDPE tanks for produced water storage
 - Construction of a plastic lined earth bund to house tanks
- PV-02 Reinjection System Upgrade
 - Installation of 4 x 30 kL HDPE tanks for produced water storage
 - Tie-in PV-02 wellhead to storage tanks to allow direct transfer of produced water
 - Tanker loading facilities for transfer of produced water from all other wellheads (produced water collected locally and transported to the storage facility via water tanker)
 - Installation of dosing skid for storage of self-bunded chemicals used in filtration
 - Installation of produced water filtration system including flow metres and chemical dosing pumps
 - Installation of new reinjection high and low pressure pumps
 - Connection of storage tanks to PV-04 using existing flowlines
- Temporary Construction Camp
 - Construction, operation and decommissioning of temporary camp for personnel involved in the works. Camp located within existing disturbance footprint in the vicinity of the existing camp.

In relation to the above activities, it should be noted that:

- All activities were conducted within the existing disturbed, cleared, operational areas
- No vegetation clearing
- No drilling
- No hydraulic fracturing / stimulation
- Existing roads and access tracks were used

The location of the Palm Valley field and the PV13 connection into the existing facilities at PV7 as well as the location of the PV2 works is shown in Figure 1-2.

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 Palm Valley Construction EMP for PV-13 Connection and PV-02 Reinjection System Upgrade EMP and therefore is not applicable to the activities in the EMP.

1.3 Assessment of Compliance

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

Table 1-1 Compliance Descriptors

Indicator	Description
Compliant	Compliant with requirement for entire 12-month reporting period
Partially Compliant	Compliant with requirement for most of the year, short periods of non-compliance
Not Compliant	Not compliant with the requirement during the reporting period
Not Applicable	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 EMP, as follows:
 - PV-13 Connection and PV-02 Reinjection System Upgrade, Construction EMP
 - Our incident management system
 - Quarterly environmental inspections
 - March, June September, December 2019
 - Weekly and daily project reports
 - Various registers in place including:
 - animal control, waste, etc
 - Internal / external audits of compliance as follows:
 - PV FEMP audit, conducted in March and December 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 PV PV-13 Connection and PV-02 Reinjection System Upgrade, Construction EMP was approved by the Minister for Primary Industry and Resources on 1 March 2019 with two 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	Activities proposed under the EMP are not to commence until the Department of Primary Industry and Resources has confirmed an approved Environmental Security Bond is held by the Department.	Compliant	CP finance records confirmed that a cash bond was submitted to DPIR on 23 February of 2019 in relation to the PV-13 Connection and PV-02 Reinjection System Upgrade, Construction EMP activities .
2	The approval is valid for 12 months	Compliant	Project reports confirmed that all of the planned work was completed within 12 months from approval.

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 PV PV-13 Connection and PV-02 Reinjection System Upgrade, Construction EMP section 9.

To align the EMP content with the regulations and AERP requirements, 'management objectives' in Tables 9-1 to 9-11 of the EMP have been used as 'environmental outcomes' as shown in Table 2-2 below. 'Performance measures' in Tables 9-1 to 9-11 of the EMP have been used as 'environmental performance standards' as shown in Table 2-2 below.

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

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
1	Minimise impacts to ecosystem, land productivity and human health values, as a result of asset integrity	No uncontrolled releases	Compliant	Incident management system records related to the project did not identify any instances of uncontrolled releases as a result of asset integrity failures.
		Keep asset installation records	Compliant	As built design drawings for assets installed as part of the project were maintained in our document management system.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	failures during the regulated activities	Keep records of inspections, monitoring test results and maintenance activities	Compliant	Records of inspections, monitoring outcomes and maintenance activities were recorded in our maintenance system. Any rectification work identified was raised as a work order, managed and closed out in the system.
		Keep training and induction records	Compliant	PV site induction and training records were maintained in a training register by site administrators and the HSE function. Induction materials includes details regarding assets integrity and safety management systems.
		Maintain records of emergency response plans	Compliant	The PV emergency response plans were stored in electronically and in hard copy on site. These plans are reviewed regularly as part of emergency exercises.
2	Minimise impacts to ecosystem, land productivity and human health values, and minimise impacts on soil, surface water and groundwater, as a result of conducting the regulated activity	No uncontrolled releases of fuel and oils	Compliant	Incident management system records related to the project did not identify any instances of uncontrolled releases of fuel or oils.
		No incorrect storage and use of fuels and oils	Compliant	Area inspection and incident management system records related to the project did not identify any instances of the incorrect storage of fuel or oils.
		Test soil surrounding a water course of drainage line if it appears to be contaminated as a result of the activities, directly after rehabilitation of contaminated soil and then one year later	Not Applicable	Incident management system records did not identify any contamination resulting from the activities. Therefore, the EPS has not been triggered.
		Maintain a hazardous material register	Compliant	The details of all hazardous chemicals on site were maintained in a chemical register which details the quantities of hazardous chemicals stored and their location. The register is updated in conjunction with the movement of chemical in and out of site.
		Keep records of inspections, monitoring test results and maintenance activities	Compliant	Records of inspections, monitoring outcomes and maintenance activities were recorded in our maintenance system. Any rectification work identified is raised as a work order, managed and closed out in the system.
		Keep training and induction records	Compliant	PV site induction and training records are maintained electronically. During the project, records identified that all employees and contractors

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
				were inducted prior to or upon arrival at site and before any work commenced. Induction materials includes details regarding impacts to the environment including soil, surface water and groundwater.
		Keep records of releases, leaks and associated clean-ups using CP's incident reporting system.	Compliant	Incident management systems records confirmed that any incidents identified were captured, categorised and assessed within the system.
		Conduct a visual inspection to ensure adequate bunding and containment strategies were implemented in the storage of fuel and oils, during the activities	Compliant	Routine area and environmental inspections were undertaken to ensure adequate bunding and containment strategies were implemented in the storage of fuel and oils, during project activities. The results of these reviews were captured in our maintenance and document management systems.
		CP committed to keeping records of the location, clean-up procedure and communication with the Department of Primary Industries and Resources regarding any spills or leaks, as required during the activities	Not Applicable	Incident management system / project reports records during the project did not identify any instances of spills and leaks. Therefore, the EPS has not been triggered.
3	Minimise impacts to ecosystem, land productivity and human health values, minimise impacts on soil, surface water and groundwater, sensitive habitat and air quality, and minimise waste generation through reduce, reuse, recycle programs, during the regulated activity	No domestic waste remaining onsite at completion of activities (i.e. general rubbish, waste chemicals, workshop wastes including oily rags, containers etc.)	Compliant	Area inspections records post activity confirmed that no domestic waste left on site. All waste removed from site and disposed of was 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.
		No unregulated waste handling	Compliant	Incident management system records related to the project did not identify any incidents involving unregulated waste.
		All waste certificates will be noted and accounted for	Partially Compliant	All waste stored on, removed from and disposed of is recorded in a waste register which includes the date of removal, type of waste, whether it is listed, volume of waste, who removed it and its destination. However, we have not maintained waste certificates in every instance as evidence to support the process.
		Keep records of the quantities of waste in and out from site as required	Compliant	All waste removed from site was 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.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Conduct visual inspections of waste receptacles to ensure secure during the daily inspection of the activities	Compliant	Regular area inspections records confirmed that inspections were conducted. In addition, no incidents of waste receptacles not being secure were observed and recorded in the incident management system records and in daily project report.
		Keep records of when clean-up material was removed from site, as required when applicable	Not Applicable	Incident management system records do not identify any incidents of clean-up materials being removed from site was identified. Therefore, the EPS was not triggered.
		CP committed to maintaining records of routine inspections for leaks	Compliant	Regular areas, quarterly environmental inspections and annual audits were undertaken to inspect areas and facilities to identify spills and leaks.
		Record all complaints regarding air quality and subsequent actions in CP's incident reporting system with corrective actions initiated.	Not Applicable	No complaints were received regarding air quality, therefore the EPS was not triggered.
		Maintain a waste register	Compliant	The details of all waste stored on site are maintained in a waste register which details the stored quantities.
		Maintain records of waste storage site inspections	Compliant	Inspections of waste storage areas to check bunding, containment systems and potential spills and leaks were undertaken, and the outcomes captured in regular areas inspections and quarterly environmental inspections records and reports.
		Report incidents of uncontrolled waste releases using CP's incident reporting system, with corrective actions initiated. Reportable incident records and regulatory notifications will be maintained	Not Applicable	Incident management system records did not identify instances of uncontrolled waste releases during the reporting period. Therefore, the EPS was not triggered. Records of regulatory reporting were maintained in our document management system.
4	Minimise disturbance to land and land use (including soils and terrain, flora and fauna), minimise erosion (via water or wind) and sediment releases, protection of	No land disturbance	Partially Compliant	Incident management system records identified one instance whilst constructing the PV-13 pipeline to PV-7 junction where a contractor cleared 1-meter extra room past marker pegs on the right of way. An investigation identified that the areas clear was previously disturbed area that was overgrown with non-sensitive vegetation and did not result in any material harm. This was reported to the regulator at the time of the incident. For the remainder of the period no further land disturbance events occurred.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	waterways, and protection of the productivity of land for its intended land use, during the regulated activity	Minimum incidences of erosion and sedimentation occurring	Compliant	Area inspections, project reports and incident management system records did not identify any erosion and sedimentation incidents as a result of the project. Devices were installed where appropriate during project operations to minimise any chance of erosion and sedimentation occurring.
		Areas left safe, stable and non-polluting	Compliant	Environmental Area inspections and incident management system records did not identify any areas being unstable or left in an unsafe state and there were no instances of reportable pollution as a result of the project.
		No new erosion flow paths originated from site	Compliant	Environmental / area inspections, project reports and incident management system records did not identify any significant new erosion flow paths as a result of the project.
		Record the location and size of erosion and sedimentation on site at the beginning of operations and following any significant rainfall events (>10mm in 74 hours)	Compliant	The location and size of any erosion on project areas was recorded in area and environmental inspections reports which occurred prior to, project activities. No records of any rainfall events during the project which would have prompted specific post event visual inspections.
		Conduct visual inspections of installed erosion and sediment control devices, to ensure conformance with DENR and IECA best practice guidelines, at the beginning of operations then following any significant rainfall events (>10mm in 74 hours)	Compliant	Monitoring and recording of erosion and sedimentation controls was undertaken as part of area / environmental inspections which occurred across the project areas prior to the project commencing. No records of any rainfall events during the project which would have prompted specific post event visual inspections .
		Conduct soil testing on any area of remediation following spill or leak, directly after clean-up at any location where a spill has occurred. Follow up sampling will be conducted until the soil is classified as remediated in accordance with the NEPM 2013 guidelines for contaminated sites, as required	Not Applicable	Incident management system records did not identify any instances of spills which resulted in contamination of soil. Therefore, the EPS was not triggered.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Monitoring for soil erosion and related issues during critical stages such as siting of infrastructure (access tracks, pipeline right of ways, laydown yards, camps and associated petroleum infrastructure); after completion of the activities all disturbed areas inspected for early signs of compaction, erosion and soil degradations (e.g. generation of bulldust); when accessing the site after the wet season, if significant impacts are identified remediation may be required prior to continued vehicle access; after more than 20 mm of rainfall	Compliant	Monitoring and recording of erosion and sedimentation controls was undertaken as part of area / environmental inspections which occurred post project. Incident management system records did not identify any instances of compaction, erosion and soil degradations on project related areas. No records of any rainfall events during the project which would have prompted specific post event visual inspections .
5	Avoid the introduction of weeds and pest fauna and avoid the spread of existing weeds and pest fauna, during the regulated activity	No introduction or spread of declared weeds and / or pest fauna resulting from Central Petroleum's activities	Compliant	Regular area inspection and incident management system records during the project did not identify any instances of the introduction of or the spread of weeds on site. The annual weed survey undertaken at PV in 2019 did not identify any increase in declared weeds. Regular area inspection, animal register and incident management system records during the project did not identify any instances of the introduction of or any increase pest fauna numbers on site.
Record weed distribution within CP's GIS and if required, providing the data to the Weeds Officer at DENR and DPIR		Compliant	Weed distribution is captured and maintained in the PV weed management plans and in CPs GIS. An annual weeds survey was conducted, and the report submitted in May 2019.	
Maintain records of weed inspections		Compliant	Regular area and environmental inspections were undertaken during the project and captured any weeds across project related areas.	
Record all weed outbreak and pest fauna incidents in CP's incident reporting system with corrective actions initiated		Not Applicable	Incident management system records did not identify any incidents of weed outbreaks or pest fauna deaths during the during the project activities. Therefore, the EPS was not triggered.	

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Notify a Weeds Officer of the presence of a declared weed within 14 after becoming aware of a declared weed that has not previously been, or known to have been, present on the land, as per the Weeds Management Act 2001	Not Applicable	No notification necessary as CPs inspection, audit and incident management system records did not identify any instances where declared weeds that had not previously been or known to have been, present on the land. Therefore, the EPS was not triggered.
6	Minimise disturbance to flora and fauna, and minimise disturbance to sensitive areas, during the regulated activity	Works area will be monitored to minimise impacts to fauna habitat and sensitive vegetation	Compliant	Work areas were monitored daily, and any impacts to were captured in project reports and the incident management system. A review of records and reports did not identify any incidents related to fauna habitat and sensitive vegetation.
		No native fauna impacts (injury or fatality)	Compliant	Incident management system records during the project did not identify any instances of fauna injury or fatalities.
		No loss of sensitive vegetation resulting from Central Petroleum's activities	Compliant	Areas / environmental inspections, incident management system records did not identify any incident involving the loss of sensitive vegetation.
		Record the number and location of introduced fauna as required during the activities	Not Applicable	Area inspection, incident management system records and the animal control register did not capture any introduced fauna during the project. Therefore, the EPS has not been triggered.
		Keep a fauna register of any sightings, near misses or strikes as required during the activities	Compliant	The animal control register was used during the project to record any instances of sightings, near misses or strikes as required during the activities.
		Record any incidents involving speeding, and corrective active actions as required during the activities	Not Applicable	Incident management system records did not capture any incidents involving speeding during the project. Therefore, the EPS has not been triggered.
		Monitoring no land clearing beyond the existing footprint	Compliant	Monitoring was undertaken to identify any land clearing beyond the existing footprint. Records on monitoring were maintained in project reports, area and environmental inspections and the incident management system.
		Keep records of any incidents involving unauthorised off-road driving	Not Applicable	Incident management system records did not capture any incidents involving unauthorised off-road driving during the project. Therefore, the EPS has not been triggered.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Monitoring every vehicle for approved weed free certificates, if the vehicle has come from a weed infested area, once prior to mobilisation to site	Partially Compliant	Contractor engagement process includes the requirement for any vehicles brought to site to have a weed free certificate prior to site mobilisation. These checks were conducted, however upon review certificates were not located in every instance.
		Maintain records of biodiversity inspections	Compliant	Regular area and environmental inspections were scheduled and undertaken with the records were captured in the maintenance and document management systems. Incident management system records did not identify any incidents of disturbance to flora and fauna.
		Report all biodiversity incidents using CP's incident reporting system with corrective actions initiated	Not Applicable	Incident management system records do not identify any incidents impacting biodiversity as a result of the project activities. Therefore, the EPS has not been triggered.
7	Minimise risk of causing bushfires, minimise impacts on environmental habitat and fauna, soil erosion, stakeholders, culturally sensitive sites, public infrastructure and community lands, and to prevent accidental fire risk and ensure safe storage and fuels, during the regulated activity	No uncontrolled fires occurring as a result of Central Petroleum's activities	Compliant	Incident management system / routine inspection records during the project did not identify any instances of uncontrolled fires as a result of the project activities.
		Check local weather conditions and fire danger warnings from internet sites daily during hot works	Compliant	Daily project reports captured local weather conditions and any impact to project related activities.
		Record all incidents of fire in CP's incident reporting system and corrective actions initiated	No Applicable	Records of all fire incidents related to operational activities were captured in the incident management system including details of any corrective actions undertaken. No fire related incidents were identified during the reporting period therefore the EPS was not triggered.
8	Minimise environmental nuisance due to dust for sensitive receptors and minimise atmospheric emissions, during the regulated activity	No complaints regarding dust / air quality	Compliant	Incident management system records did not identify, and incident of complaints related to dust or air quality.
		Amicable resolution of complaints	Not Applicable	No complaints received. Therefore, the EPS has not been triggered.
9	Minimise impacts upon environmental values of	No issues raised by the community	Compliant	Incident management system records during the project did not identify any instances of complaints from the community.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	the local community, minimise impacts on cultural heritage, minimise safety risks to the public and other third parties, maintain and enhance partnership with the local community, including local contractors, and no loss to the aesthetic or enjoyment for the community, during the regulated activity	No unresolved complaints	Not Applicable	No complaints received. Therefore, the EPS has not been triggered.
		The community will be highly consulted, and all comments will be assessed and where viable, recommendations implemented	Compliant	PV stakeholder communications log records indicated CP's continued engagement with identified stakeholders prior to, during and post the project.
		There will be a high level of satisfaction by the community	Compliant	Records of local community meetings indicate a generally positive response to CP activities and engagement with the community.
		No vehicle accidents	Compliant	Incident management system records during the project did not identify any vehicle accidents.
		Servicing vehicles in accordance with vehicle manufacturer's specifications	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.
		Record complaints from surrounding land users regarding noise and vibrations from operations	Not Applicable	The incident management system did not identify any records of complaints from surrounding land users' regarding noise and vibration, therefore the EPS was not triggered.
		Keep a register of all incidents related to access issues, unauthorised access and requirements of pastoralists, recognising that these requirements may change seasonally	Not Applicable	The incident management system did not identify any incidents of unauthorised site access, therefore the EPS was not triggered.
		Tracking fauna strikes and near misses in the Wild Animal Control Register	Not Applicable	Incident management system records did not identify any instances of sightings, near misses or strikes as a result of project activities.
		Maintain a complaints register	Compliant	Records of all complaints related to the operation are registered and captured in the incident management system. No records of any complaints as a result of project activities were identified.
		Keep records of stakeholder engagement	Compliant	PV stakeholder communications log recorded CP's continued engagement with defined stakeholders prior to, during and post the project.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
		Keep records of environmental compliance	Compliant	Compliance with obligations is maintained in records in our maintenance and document management systems capturing outcomes from periodic inspections, audits, reviews and activities. In addition, all non-compliance with environmental obligations were captured and recorded in the incident management system and reported as required to the relevant authority.
		All traffic and transport incidents related to any contamination of the environment, erosion or loss of fauna to be recorded in CP's incident reporting system with corrective actions closed out and recorded	Not Applicable	No incidents were identified during the period therefore the EPS was not triggered. Therefore, the EPS has not been triggered.
10	Minimise impacts upon environmental values of the local community, minimise impacts on cultural heritage, minimise safety risks to the public and other third parties, maintain and enhance partnership with the local community, including local contractors, and no loss to the aesthetic or enjoyment for the community, during the regulated activity	No issues raised by the community	Compliant	Incident management system records during the project did not identify any instances of complaints from the community.
		No unresolved complaints	Not Applicable	No complaints received. Therefore, the EPS has not been triggered.
		The community will be consulted, and all comments will be assessed and where viable, recommendations implemented	Compliant	PV stakeholder communications log records indicated CP's continued engagement with identified stakeholders prior to, during and post the project. No objections were raised as a result of the project activities.
		There will be a high level of satisfaction by the community	Compliant	Records of local community meetings indicate a generally positive response to CP activities and engagement with the community.
		No offsite release of contamination from road corridors	Not Applicable	Incident management system records during the project did not identify any instances of offsite release of contaminants impacting road corridors. Therefore, the EPS has not been triggered.
11	Avoid disturbance of or damage to Aboriginal or cultural heritage artefacts or Sacred	No incidences of disturbance of archaeological sites of sites of cultural significance	Compliant	All activity was undertaken on previously disturbed and cleared land. Incident management records during the project did not identify any incidents which impacted aboriginal or cultural heritage artefacts or sites.

No	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
	Sites, minimise impacts on or disruption to activities of Indigenous stakeholders in culturally significant areas, ensure adequate background information and training is provided to employees and contractors working in culturally significant areas, and ensure the health and safety of working and the community is not compromised through management of cultural and environmental awareness, during the regulated activity	Keep records of any incidents involving interference with Aboriginal sacred sites, places or objects of archaeological significance	Not Applicable	Incident management system records did not identify any incidents involving interference with aboriginal sacred sites, places or objects of archaeological significance. Therefore, the EPS has not been triggered.
12	EMP s 10, Table 10-2 All	Keep records of site inductions showing 100% participation by all personnel, contractors and visitors before access to site	Compliant	PV site induction records maintained in the training register during the project identified that all employees and contractors were inducted prior to or upon arrival at site and before any work commenced. Incident management system records during the project did not identify any employees and contractors who were not inducted. Induction materials include content which deals with the environmental outcomes included in the EMP.
13	EMP s 10 Auditing	Conduct an internal audit of the activities by a suitably qualified person to ensure that the outcomes of the EMP are met	Compliant	An audit was undertaken in July 2020 of the regulated activities and assessed against the environmental objectives and performance standards in the EMP.

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; other commitments made in the PV PV-13 Connection and PV-02 Reinjection System Upgrade, Construction EMP; and notification and reporting requirements under other applicable legislation. Where relevant, CP also confirms that all known records, monitoring or required reporting under the Petroleum (Environment) Regulations 2016 (NT) has been provided to DENR or the relevant NTG agency.

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.	Compliant	CP has provided notice to the minister advising the regulated activity has been completed and requesting closure of this EMP based on completed outcomes described in this AEPR.
2	EMP s 11 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	PV stakeholder communications log records indicated CP's continued engagement with identified stakeholders during and post the project.
3	EMP s 11 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.

No	Reference	Requirement	Compliance Status	Evidence
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).	Non-Compliant¹	There were no reportable incidents recorded during the reporting period, however no quarterly recordable incident reports were submitted to DENR within the reporting period for the regulated activity. CP assumed that any incidents could be submitted in reports under the PVGF EMP however we failed to make this statement when submitting the reports for PV.
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.	Compliant	The Minister was informed indirectly via multiple emails and face to face meetings with DIPR in mid to late 2018 prior regulated activity commencing under this EMP. The CLC, representing the traditional owners were informed of the commencement of activities at a site visit which occurred in late September 2018.
9	National Environment Protection (National Pollution Inventory) Measure 1998 s 9	Regulatory reporting under the National Pollution Inventory (NPI) as per the National Environment Protection (National Pollution Inventory) Measure 1998	Compliant	NPI reporting was undertaken and submitted as per the National Environment Protection requirement in September 2019.
10	Environment Protection and Biodiversity Conservation Act 1999 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	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

¹ Central understands that it is DENR's expectation that a report is required every reporting period including periods in which there are no incidents to report. Compliance for this item has been measured against DENR's expectations, irrespective of the requirement to do so.

No	Reference	Requirement	Compliance Status	Evidence
		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.		species in or on a Commonwealth area and the activity was not authorised by a permit.
11	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 PV including during the project was undertaken as per the National Greenhouse and Energy Reporting Act and was submitted in September 2019.
12	Bushfires Management Act 2016 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.
13	Environment Protection Act 2019 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.

No	Reference	Requirement	Compliance Status	Evidence
14	Territory Parks and Wildlife Conservation Act 1976 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.
15	Waste Management and Pollution Control Act 1998 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.
16	Weeds Management Act 2001 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 98 total compliance items.

Table 3-1 Compliance Summary

Compliance Indicator	Number	Percentage
Compliant	58	62%
Partially Compliant	3	3%
Non-Compliant	1	1%
Not Applicable	32	34%

3.2 Overview of Items Found Not Compliant or Partially Compliant

The following sections describe:

- The specific compliance requirements not met for the project 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 assessed as being partially compliant during the reporting period.

Table 3-2 Partially compliant Environmental performance standards

Description	Potential environmental harm or impact	Corrective actions
Although all waste removed from site and disposed of was 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. However, we have not maintained waste certificates as evidence to support the process in every instance.	No environmental harm as: - this is an administrative requirement. - Records were maintained listed waste removed, who removed it and its destination.	Contractors engaged to remove and dispose of waste from site have been contacted and the requirement for completed waste certifications to be returned recomunicated. Regular audits of the waste register will be undertaken to confirm all applicable waste removed from site have the appropriate waste certificates to support.
Whilst constructing the PV-13 pipeline to PV-7 junction where a contractor cleared 1-meter extra room past marker pegs on the right of way. An investigation identified that the area cleared was previously disturbed area that was overgrown with non-sensitive vegetation and did not result in any material harm. This event was reported to the regulator at the time of the incident. For the remainder of the period no further land disturbance events occurred.	Short / medium term impact on a low risk area (i.e.) area cleared was overgrown with common flora species due to previously being cleared.	For all future construction projects, any civil works contractors and the project manager will clearly and jointly mark with pegs the work area.

Description	Potential environmental harm or impact	Corrective actions
Contractor engagement process includes the requirement for any vehicles brought to site to have a weed free certificate prior to site mobilisation. CP HSE coordinator confirmed these checks were conducted; however written records were not located in every instance.	Zero environmental harm or impact given checks were performed. Recent inspection results and weed surveys undertaken have not identified any newly introduced weeds.	Verification and document storage standards have been implemented and weed free certificates are now being managed under the PV FEMP.

3.2.2 Regulatory Reporting

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

Table 3-3 Partially compliant regulatory reporting requirements

Description	Potential environmental harm or impact	Corrective actions
No specific reports were provided under regulation 35 as CP interrupted that reports were only necessary when a recordable incident took place and any incidents would have been included under the PVG field reports. There was one recordable incident which was reported to DIPR at the time of the incident.	Zero environmental harm or impact as: - this is an administrative requirement.	All current CP EMPs as per guidance provided will report recordable or nil incidents as required. No further action on this EMP, as notice has been sent to the minister requesting closure under regulation 14.

3.3 Application of Lessons Learned Across Central Petroleum 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 regulatory requirements especially in regard to pre and post project 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;
- Align requirements across open EMPs to ensure standards are aligned where possible; and
- Close out EMPs as soon as practical after the work have been completed.