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Submission contents:

Please accept this submission on the referral of the Carpentaria Pilot Production project by Imperial Oil and Gas. The project has the potential to have a significant impact on the environment and Imperial should be required to prepare a full Environmental Impact Statement, or at the very least a Supplementary Environment Report. The material provided by the proponent is incomplete and inaccurate. It downplays the impacts of the project by omitting information and failing to investigate or describe its major environmental impacts. The water, climate change and biodiversity impacts of the project in particular, have the potential to be significant and long-lived and should be subject to comprehensive assessment. Please consider the following points in making your decision: - Imperial falsely claims that the impacts of greenhouse gas emissions will be reduced or completely removed by the sale of appraisal gas, however shifting the emissions downstream does not alter the climate change impacts of those emissions. - The referral fails to identify the environmental impacts and risks of those emissions, or where those emissions would occur. These details are critical for the NT EPA to understand with regards to the NT EPA objective of net zero emissions by 2050. - Imperial fails to identify that there are additional potential significant impacts related to the extraction of groundwater, risks of cross-contamination and induced seismicity from hydraulic fracking and the wastewater management system proposed in the EMP. - The referral documents provide insufficient information to fully assess potential risks which are required for the EPA to be satisfied about the acceptability of those risks. Missing water information includes groundwater testing and drawdown modelling, surface water hydrology and detailed plans for the wastewater management system. - The conclusion that this activity will not pose a significant impact to nationally threatened and migratory species is not supported by evidence, and the material provided to the EPA by Imperial demonstrates serious deficiencies in the survey effort and assessment of these species. - The referral to the EPA asserting 'no significant impact' occurred prior to a follow-up meeting with Traditional Owners that was scheduled in the late months of 2023 and had to be postponed. It seems that Traditional Owners have not been provided opportunities to contribute knowledge about biodiversity and water impacts.