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Submission contents:

26 April 2024 Submission objecting to Imperial Energy Carpentaria pilot Environmental Management Plan EP187 Thank you for the opportunity to comment on this draft EMP. I was born and raised in Darwin and have children and grandchildren living in Darwin. I believe this project will have a serious and irreversible impact on our environment and must be rejected. I am very concerned by the already evident impacts of climate breakdown across the NT and believe this project as proposed by Imperial Oil and Gas will make climate change worse, especially as it would be a precursor to large scale fracking across the Beetaloo. I also believe the proposal ignores the concerns of many Traditional Owners who have never asked for fracking on their Country and whose concerns around water use and pollution, cultural heritage, etc, have been largely ignored. If approved, this fracking proposal would: - Use and contaminate a massive 950 million litres of groundwater; - Create 35 million litres of toxic wastewater for EACH WELL that will need to somehow be safely disposed of, and - Produce hundreds of thousands of tonnes of carbon emissions every year in total. 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 in 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. For the above reasons I believe the EPA must recommend against this proposal. Yours faithfully Eve Chaloupka