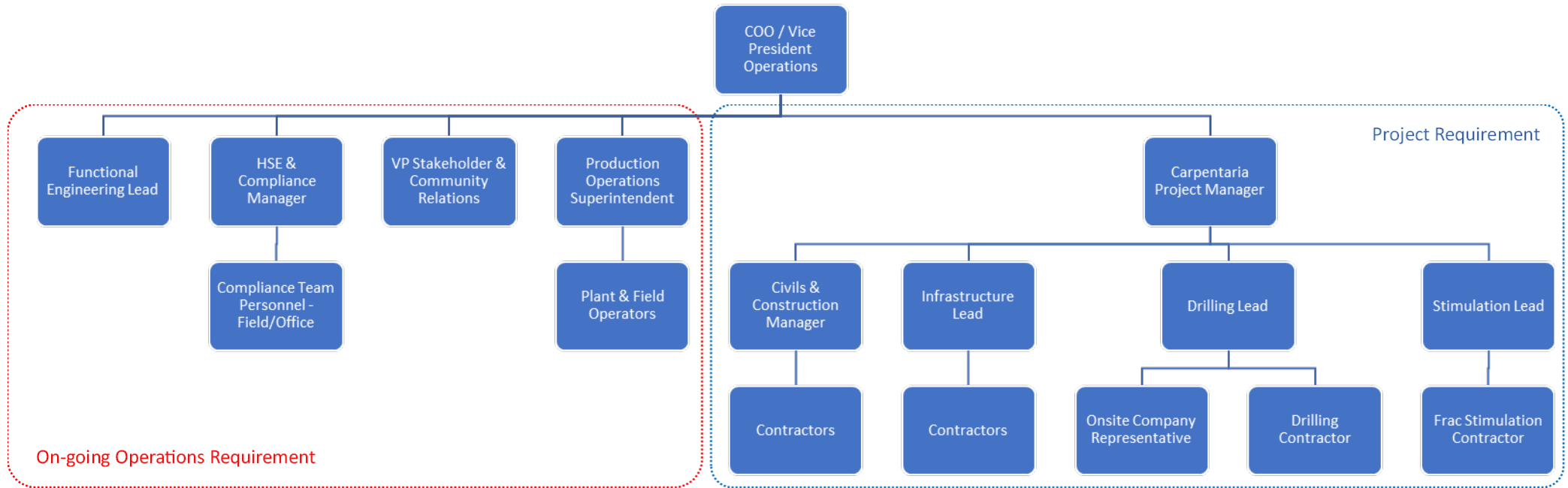


# Referral form - Environment Protection Act 2019

<b>PART A - Proponent details</b> It is the proponent's responsibility to advise the NT EPA in writing, of changes to consultant and proponent contacts.	
Name of the proponent/s <i>(legal entity)</i>	Imperial Oil & Gas Pty Ltd
Proponent details	Name: Alex Underwood Position/responsibility: Chief Executive Officer Physical address: Level 5, 6-10 O'Connell St, Sydney NSW 2000 Phone: 02 9251 1846 Email: aunderwood@empiregp.net
Proponent Trading Name if relevant	
Australian Business Number/s Australian Company Number/s	ACN 002699578 ABN 92 002 699 578
Provide a description of the organisational structure with respect to responsibility of the proposed action, environmental approvals and implementation.	Imperial plans to operate the project utilising the following management structure, with responsibilities aligned to specific roles detailed on the subsequent page. However, all personnel have a responsibility to operate in a safe and environmentally responsible manner. The organisational structure is provided in <b>Figure 1</b> below.



**FIGURE 1 ORGANISATIONAL STRUCTURE**

**PART B – Outline of the proposal and location**

**Outline of the Proposed action or strategic proposal (proposal)**

Name of Project	Carpentaria Pilot Project (CPP) EP 187
Provide a brief summary (one or two paragraphs) of the proposal including the activity type/ industry/ duration.	<p>Imperial is proposing a program for an ongoing appraisal testing phase in its unconventional gas project at EP 187 in the Northern Territory (NT); this Carpentaria Pilot Project (CPP) and its associated works is hereafter referred to as the Activity. The area where the Activity is to be carried out in EP 187 is referred to as the CPP Area.</p> <p>The Activity follows on from petroleum exploration and appraisal undertaken within the EP since 2019 and will include drilling, stimulation, tie in of wells and appraisal testing at up to four new well pads, and two existing well pads locations in the CPP Area. It also includes construction of the Carpentaria Gas Plant (CGP) and Water Handling Station (WHS), the installation of buried gas and wastewater flowlines between well pads, the WHS, and the CGP. The Activity may require an expansion of the land disturbance footprint by up to 226 ha (including 21 ha of contingency) from the existing 43.4 ha to approximately 269 ha, within the 442,700 ha area of EP 187.</p> <p>Before the gas appraisal phase commences, Imperial will apply to the Minister for Mining and Industry for approval to recover petroleum on an appraisal basis under Section 57AAA of the Petroleum Act 1984 (NT) and, if successful, export gas to the McArthur River Pipeline. If that approval is granted, average annual Scope 1 emissions from the Activity would reduce by ~90% to approximately 30,000 t CO<sub>2</sub>-e. In no financial year covered by the EMP will the estimated emissions exceed the 'large greenhouse gas emitters' industrial project annual threshold of 100,000 tCO<sub>2</sub>-e. It is proposed in the Activity schedule, that the first gas exports will commence in mid-2025.</p> <p>If the Appraisal Phase is deemed unsuccessful, the residual environmental impacts from the Activity will not be significant.</p>

Location	
Provide location details as: <ul style="list-style-type: none"> <li>street address, suburb</li> <li>tenement, lot/section numbers, town/hundred, NT Portion or pastoral lease numbers, as applicable</li> <li>the nearest town, recognisable feature, and distance and direction from that town/feature to the site of the proposed action.</li> </ul>	<p>The Activity is situated in the Barkly region of the NT on the southwest flank of EP 187 in the Sturt Plateau and Gulf Fall and Uplands bioregions. The Carpentaria Highway and McArthur River Pipeline transect the CPP Area from east to west.</p> <p>The CPP Area lies wholly within NT Portion 5706, an indigenous estate for the Mambaliya Rumburriya Wuyaliya Aboriginal Land Trust.</p> <p>The nearest community/town of Cape Crawford is 66 km east, Borroloola is 140 km northeast, Birdum is 190 km northwest, and Darwin is 640 km northwest.</p>
Name of the <a href="#">Local Government Area/s</a> in which the proposal is located.	Barkly Region
What is the land tenure type?	Mambaliya Rumburriya Wuyaliya Aboriginal Land Trust
Does the proponent have the legal (land) access required for the implementation of all aspects of the proposal?	<input type="checkbox"/> No If no, provide details of legal access authorisations /agreements / tenure is required and from whom. <input checked="" type="checkbox"/> Yes NLC Exploration Deed for EP187, executed with Imperial on 5 February 2014 on behalf of the Mambaliya Rumburriya Wuyaliya Aboriginal Land Trust, and subsequently approved by the Commonwealth Minister, pursuant to ALRA 1976. The EP 187 NLC Exploration Deed describes the petroleum shale resource of interest and sets out the terms and conditions agreed upon by the NLC and Imperial under Section 46 of ALRA.
Is the <a href="#">land zoned under the NT Planning Scheme</a> ?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If yes, what is/are the zoning/s? NT Portion Parcel Number 5706 - Mambaliya Rumburriya Wuyaliya Aboriginal Land Trust in the Bauhinia Downs/OT Downs / Mallapunyah map sheets. Freehold
What is the current land use of the proposal site/s?	Pastoral agistment.


<p>What is the approximate distance (direct line) and direction to the closest human sensitive receptor? For example, residence, accommodation, hospital, school, homeland from the proposal.</p>	<p>The nearest dwelling is ~1.3 km from the CPP Area boundary, ~2.2 km from the nearest Activity (highway turn off), ~4 km from the nearest potential well pad location and ~7 km to the CGP.</p>
<p>Consultation</p>	
<p>Provide an overview of consultation undertaken specific to the proposal and potential environmental impacts.</p>	<p>Imperial has taken a proactive approach to early and ongoing engagement with a diverse range of stakeholders and the wider community.</p> <p>A Stakeholder Engagement and Consultation Plan has been developed to facilitate the delivery of effective stakeholder engagement specific to the proposed activities for the Carpentaria Pilot Project. The Plan includes specific details such as:</p> <ul style="list-style-type: none"> <li>• Purpose of engagement</li> <li>• Legislative and regulatory requirements</li> <li>• Approach, objectives and outcomes</li> <li>• Engaging with Aboriginal stakeholders</li> <li>• Stakeholder analysis and mapping</li> <li>• Engagement methodologies</li> <li>• Monitoring and evaluation</li> <li>• Ongoing engagement.</li> </ul> <p>A Stakeholder Engagement Report has been completed that describes the various methodologies and consultation materials that have been developed to communicate information about proposed activities and potential environmental impacts associated with the activities. This report also details the consultation activity undertaken prior to the submission.</p>
<p>List the matters raised in consultation and identify how the proposal has been modified to respond to stakeholder feedback.</p>	<p>Imperial has kept a log of key issues raised throughout consultation including the information provided, Imperials response, ongoing actions and how the matters have been addressed in the EMP. Key issues raised by stakeholders has predominantly been to gain further understanding and information as opposed to offering alternative solutions. This evidence is documented in the Stakeholder Engagement Report and Communications Log.</p> <p>Key issues documented includes:</p> <ul style="list-style-type: none"> <li>• Aquifer Protection and Well Integrity</li> <li>• Location of Activities</li> <li>• Drilling and Fracking Activities</li> <li>• Business Contracting Opportunities</li> <li>• Water Supply</li> <li>• Approvals Required for Project Development</li> <li>• Rehabilitation</li> </ul>

	<ul style="list-style-type: none"> <li>• Employment Opportunities</li> <li>• Water and Wastewater Management</li> <li>• Environmental Monitoring</li> <li>• Surface Impact and Land Clearing</li> <li>• Access.</li> </ul> <p>The register of issues raised by stakeholders and Imperial's response will continue to be documented throughout ongoing consultation.</p>
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PART C – Referral type	
What type of proposal is being referred?	<input checked="" type="checkbox"/> proposed action <input type="checkbox"/> strategic proposal <input type="checkbox"/> proponent initiated EIS referral
<p>Provide a brief justification including the reasons why you consider the action may have a significant impact on the environment and is referred to the NT EPA.</p> <p>Refer to section 11 of the EP Act and the <a href="#">NT EPA's environmental factors and objectives</a>.</p>	<p><u>Potential Scope 1 GHG Emissions – Atmospheric Processes</u></p> <p>The <i>Greenhouse Gas Emissions Management for New and Expanding Large Emitters</i> policy identifies the NT Government's minimum requirements for managing greenhouse gas emissions from new or expanding industrial and land use development projects [Northern Territory Government, 2021].</p> <p>Flaring during the appraisal phase could potentially result in the release of approximately 475,000 t CO<sub>2</sub>-e/annum. This rate of release would exceed the threshold for large greenhouse gas emitters of 100,000 t CO<sub>2</sub>-e in any financial year.</p>
Does the proposal involve an action that may be or is a controlled action under the Commonwealth <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Has the proposed action been referred?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, provide the date referred and reference number (EPBC number)?  Date:                                      EPBC number:
If referred, has a decision been made on whether the proposed action is a controlled action?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, check the appropriate decision outcome and provide the decision in an attachment. <input type="checkbox"/> Decision – controlled action <input type="checkbox"/> Decision – not a controlled action

## PART D – Proponent referrer details and declaration

\*The referral form must include the declaration signed by the proponent, or where the proponent is an organisation or business, the Chief Executive Officer (CEO) or duly authorised delegate within the proponent company.

Who is referring this proposal?		<input type="checkbox"/> Proponent <input checked="" type="checkbox"/> Authorised representative within proponent entity	
Does the proponent request that the NT EPA treat any part of the information in the referral as confidential under section 281(2) of the EP Act?		<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes  If yes, provide an application in accordance with regulation 271 of the Environment Protection Regulations 2020 and submit the confidential information as a <b>separate</b> attachment	
<b>Referral declaration by proponent:</b>  I, .....Robin Polson....., ( <i>full name</i> ) declare that I am authorised to refer this proposed action/strategic proposal on behalf of...Imperial Oil and Gas Pty Ltd.... and further declare that: <ul style="list-style-type: none"> <li>the attached environmental impact assessment documents have been prepared in accordance with the EP Act and EP Regulations; and</li> <li>the attached environmental impact assessment documents (including attachments) are true; and</li> <li>the attached environmental impact assessment documents do not provide false or misleading information and I know it is an offence to provide false and misleading information, noting the penalties under section 260 of the EP Act, and section 119 of the <i>Criminal Code Act 1983</i>; and</li> <li>the proponent fully understands that referral under the EP Act does not limit, in any way, the requirements of the proponent to ensure approvals under any other regulatory regime are applied for, and adhered to; and</li> <li>the proponent has fulfilled its general duty in accordance with section 43 of the EP Act.</li> </ul> <p><i>Note: if the NT EPA determine that an environmental approval is required, the proponent will be requested to provide supporting documents during the assessment process such as details to support that the person is a fit and proper person to hold an environmental approval in accordance with section 62 of the EP Act</i></p>			
Name (print) Robin Polson		Signature* 	
Date: 19 February 2024			
Position	Chief Financial Officer	Organisation (if a business or organisation)	Imperial Oil and Gas Pty Ltd.
Email	rpolson@empiregp.net		
Address	6-10	O'Connell St	
Sydney		NSW	2000

## PART E – Nominated contact

<p>Contact details for proponent contact (provide the details for the person who will be corresponding with the NT EPA on the proposal)</p>	<p><i>Business name: Imperial Oil and Gas Pty Ltd.</i> <i>Name of primary contact: Robin Polson</i> <i>Physical address: Level 5, 6-10 O'Connell Street</i> <i>Postal address: Level 5, 6-10 O'Connell Street</i> <i>Phone: (02) 9251 1846</i> <i>Email: info@empiregp.net</i></p>
<p>Contact details of consultant (if relevant, provide the details for the person who will be corresponding with the NT EPA on the proposal on behalf of the proponent)</p>	<p><i>Business name: inGauge Energy</i> <i>Name of primary contact: Trent Smith</i> <i>Physical address: 4, 301 Coronation Drive, Milton QLD 4064</i> <i>Postal address: Suite 11, 1b/47 Park Road, Milton QLD 4064</i> <i>Phone: 0477309796</i> <i>Email: trent.smith@ingauge.com.au</i></p>



**Checklist 1 – Cross reference of matters addressed in the referral report (for more detail see Table 1 in section 3.3.1 and section 4 of the Referring a proposal to the NT EPA guidance)**

Item	See <a href="#">Referral guidance</a> for complete information requirements	Report section/page
<i>Publication statement</i>	Provide name and qualifications of relevant contributors to the referral.	p19
<i>Executive summary</i>	Overview of the proposal, its potential for significant impact and key conclusions.	p21
<i>Introduction</i>	Include a brief introduction to the proposal and the proponent (noting proponent details are also to be included in the referral form).	p34
<i>Proposal description - Key components</i>	Provide a clear and detailed description of the proposal, referencing maps and spatial information.	p35
	Provide a key components summary table.	p36
	Identify uncertainty / likely changes if particular elements of a proposal require further design at the time of referral.	p42
	Provide an account of past, present and reasonably foreseeable future development, operations, or industries that are related the current proposal.	p102
<i>Proposal description - Location and regional context</i>	Location and regional context.	p34
<i>Proposal description - Alternatives (options)</i>	Describe any alternatives (location, timeframes, activities) considered or are under consideration in scoping and developing the proposal.	p35/ p45
	Describe how the analysis of alternatives accounted for the <i>principles of environment protection and management</i> (Part 2 of the EP Act).	p45
	Justification for the preferred/selected option.	p45
	Describe any assumptions critical to your assessment.	p98
<i>Proposal description - Application of the:</i> <ul style="list-style-type: none"> <li>- <i>Principles of environment protection and management (Part 2)</i></li> <li>- <i>General duty of proponents (s43)</i></li> </ul>	Discuss how the proposal accounts for the <i>principles of environment protection and management</i> (Part 2 of the EP Act) and the general duty of proponents provided for under section 43 of the EP Act: <ul style="list-style-type: none"> <li>• Principles of ecologically sustainable development</li> <li>• Environmental decision-making hierarchy</li> <li>• Waste management hierarchy.</li> </ul>	p102
<i>Consultation</i> <a href="#">Refer to NT EPA Stakeholder Engagement guidance 2020</a>	The EP Act (section 3 and section 43) puts an obligation on the proponent to consult with stakeholders and the community in the development of the proposal.  As an example, the referral should include: <ul style="list-style-type: none"> <li>• a description of stakeholder engagement and community consultation undertaken</li> <li>• an outline of the method and process of consultation with stakeholders</li> </ul>	p90

Item	See <a href="#">Referral guidance</a> for complete information requirements	Report section/page
	<ul style="list-style-type: none"> <li>• a summary of the key matters raised during consultation</li> <li>• any changes made as a result of consultation</li> <li>• the ongoing consultation, and options for feedback</li> <li>• whether the consultation has or has not been undertaken in accordance with NT EPA guidance on Stakeholder Engagement 2020</li> <li>• whether the consultation has or hasn't been undertaken in accordance with the section 43 (EP Act) general duty of proponents (see Checklist 2).</li> </ul>	
<i>Strategic and statutory context</i>	Table discussing proposal specific legislation, policies, and guidelines that are and may be applicable to the proposal and the sequencing and status of those, is provided.	EMP Sect 2
<i>Environmental Factors</i>	<p>The remaining sections below relate to information that describes the potential impacts of the proposal on the NT EPA's Environmental factors.</p> <p>Information requirements for each environmental factor identified by the pre-referral screening tool are provided (any technical studies and surveys included).</p>	
<i>Environmental Factors and objectives</i> Presence/absence of environmental values	<p>The presence or absence of relevant environmental values and sensitivities are verified.</p> <p>Specify the source of information (e.g. desktop assessments, and/or field surveys, the methods used, dates, sources, and whether the approach is conducted in accordance with relevant regulatory and industry guideline.</p> <ol style="list-style-type: none"> <li>1. Landforms</li> <li>2. Terrestrial Environmental Quality</li> <li>3. Terrestrial Ecosystems</li> <li>4. Hydrological Processes</li> <li>5. Inland Water Quality</li> <li>6. Aquatic Ecosystems</li> <li>7. Air Quality</li> <li>8. Atmospheric Processes</li> <li>9. Community and Economy</li> <li>10. Culture and Heritage</li> <li>11. Human Health</li> </ol>	p46
<i>Environmental Factors and objectives</i> Potential impacts and consistency with relevant policy/guidance	<p>Assessment of potential impacts (positive, negative, direct, indirect, cumulative, short and long-term) of the proposal.</p> <p>Relevant policy and guidance described.</p> <p>Residual / remaining impact to the environmental factor described.</p>	p98
<i>Environmental Factors and objectives</i> Environment protection and management	<p>Describe in terms of management hierarchies:</p> <ul style="list-style-type: none"> <li>• measures proposed to avoid, mitigate or offset (if appropriate)</li> <li>• effectiveness of proposed measures and the level of confidence of implementation</li> <li>• whether the NT EPA's objective for the environmental factor is likely to be met.</li> </ul>	p98
<i>Environmental Factors and objectives</i>	Repeat for each NT EPA Factor being considered for your proposal/referral	p102

Item	See <a href="#">Referral guidance</a> for complete information requirements	Report section/page
Cumulative impacts	Describe potential cumulative impacts.	

## Checklist 2 – Consideration of the Proponent’s general duty (in accordance with section 43 of the EP Act)

Section 43 General duty	Done	Comment
The following principles of ecologically sustainable development must be taken into consideration in the design of the proposed action.		
<ul style="list-style-type: none"> <li>Decision-making principle</li> </ul>	✓	<p>The decision-making principle (s 18 Environment Protection Act 2019) requires effective integration of long-term and short-term environmental and equitable considerations, and for processes to provide for community involvement in relation to decisions and actions that affect the community.</p> <p>In this regard, Imperial notes that the regulated activity is the continued appraisal of the gas resource in EP 187 to inform decision-making about longer-term petroleum activities.</p> <p>Imperials’ corporate values are:</p> <ol style="list-style-type: none"> <li>Safety &amp; Environmental Stewardship: are our highest priority;</li> <li>Behaviours: we work creatively with integrity, honesty, accountability, transparency, and we deliver on our promises;</li> <li>Collaboration: we listen to our stakeholders, build long-term relationships, and share ideas and knowledge; and</li> <li>Respect: we unconditionally respect our employees, stakeholders, local communities, Traditional Owners of the areas in which we operate and their cultural heritage.</li> </ol> <p>As part of Imperial’s environmental stewardship, the key principle of “isolation, containment, integrity, monitoring and compliance” in respect to the environmental protection and engineering controls are key considerations in all aspects of decision making in planning for the Activity.</p>
<ul style="list-style-type: none"> <li>Precautionary principle</li> </ul>	✓	<p>The precautionary principle (s 19 Environment Protection Act 2019) applies when there are threats of serious or irreversible environmental damage, and requires that lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.</p> <p>Imperial has considered the precautionary measures in the risk-weighted consequences of impacts and developed options to avoid serious or irreversible damage to the environment wherever practicable. The EMP mitigates risks of serious or irreversible damage due to lack of full scientific certainty to a level that is both as low as reasonably practicable and acceptable. (Section 6 of the EMP and comprehensive management plans based on the identified and assessed risks).</p>
<ul style="list-style-type: none"> <li>Principle of evidence-based decision-making</li> </ul>	✓	<p>The principle of evidence-based decision-making (s 20 Environment Protection Act 2019) requires decisions to be made on the best available evidence in the circumstances that is relevant and reliable.</p> <p>Imperial has met this requirement because;</p> <ol style="list-style-type: none"> <li>The EMP was developed by engineers, an archaeologist, and environmental consultants, with experience in the Beetaloo Sub-basin.</li> <li>Imperial employed a comprehensive process to obtain relevant information including baseline assessments, archaeological assessments, stakeholder engagement and consultation.</li> </ol>

Section 43 General duty	Done	Comment
<ul style="list-style-type: none"> <li>Principle of inter-generational and intra-generational equity</li> </ul>	✓	<p>The principle of intergenerational and intra-generational equity (s 21 Environment Protection Act 2019) requires that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of present and future generations.</p> <p>To support this requirement, Imperial notes that</p> <ol style="list-style-type: none"> <li>The estimated water requirement is modest for the Georgina Basin</li> <li>Potential impacts on cultural heritage have been avoided by engagement of a cultural heritage consultant and Traditional Owners to survey the proposed area of the Activity</li> <li>The Activity will increase the economic potential for future generations by increasing economic activity in the area and the NT</li> <li>The Activity is a precursor to future economic gains from a viable petroleum industry in the area.</li> <li>The health, diversity and productivity of the environment is maintained or enhanced for the benefit of stakeholders and the wider community.</li> <li>The environmental risks of the Activity have been reduced to as low as reasonably practicable and acceptable.</li> <li>The recovery of gas on an appraisal basis will significantly reduce the Scope 1 greenhouse gas emissions from the Activity compared to a BAU basis</li> <li>Cultural values relating to sacred sites will be protected through the application of Authority Certificates issued to Imperial under the Northern Territory Aboriginal Sacred Sites Act 1989 and measures for reporting on discovery of archaeological sites during civil and maintenance activities.</li> </ol>
<ul style="list-style-type: none"> <li>Principle of sustainable use</li> </ul>	✓	<p>The principle of sustainable use (s 22 Environment Protection Act 2019) requires that natural resources should be used in a manner that is sustainable, prudent, rational, wise and appropriate.</p> <p>In meeting this principle, Imperial notes the following;</p> <ol style="list-style-type: none"> <li>The findings of the Scientific Inquiry into Hydraulic Fracturing in the Northern Territory that in the short to medium term, the Australian National Energy Market is likely to require higher levels of flexible, gas fired generation, which can provide a reliable, low emissions generation, and essential security services to complement variable renewable electricity generation.</li> <li>The EMP has addressed the cumulative impact associated with current and future groundwater takes which was assessed to be about 0.4% of the estimated sustainable yield of the Georgina Basin.</li> <li>The proposal to re-use flowback fluid would significantly reduce the groundwater take compared to BAU.</li> </ol>
<ul style="list-style-type: none"> <li>Principle of conservation of biological diversity and ecological integrity</li> </ul>	✓	<p>The principle of biological diversity and ecological integrity (s 23 Environment Protection Act 2019) requires that biological diversity and ecological integrity should be conserved and maintained.</p> <p>In relation to this principle, Imperial notes the following;</p> <ol style="list-style-type: none"> <li>Regarding the existing biodiversity and ecosystems that are to be affected, Imperial believes that the mitigation measures in the EMP are reasonably available and sufficient.</li> <li>The EMP identifies threatened species that are likely to occur in the area and includes measures to reduce the potential impacts of the Activity on them.</li> <li>The EMP outlines measures to minimise impacts on environmental values, including the management of wastewater spills, weeds and fire. The management measures are consistent with the requirements of the Code, the NT Land Clearing guidelines and the Weed Management Planning Guideline: Onshore Petroleum Projects.</li> </ol>

Section 43 General duty	Done	Comment
		<ul style="list-style-type: none"> <li>iv. Specific precautions to ensure interaction with wildlife is avoided are included in the EMP, including inspections for fauna presence, fauna ladders on storage tanks, fencing around well pads, use of speed limits on access roads, above ground tanks with raised walls, and checks of infrastructure.</li> </ul>
<ul style="list-style-type: none"> <li>• Principle of improved valuation, pricing and incentive mechanisms</li> </ul>	✓	<p>The principle of improved valuation, pricing and incentive mechanisms (s 24 Environment Protection Act 2019) requires that environmental factors should be included in the valuation of assets and services, through application of the 'polluter pays' principles, consideration of full life cycle costs of providing goods and services, and pursuing environmental goals in the most cost-effective way.</p> <p>In meeting this principle, Imperial notes that;</p> <ul style="list-style-type: none"> <li>i. Hazardous and non-hazardous waste will be disposed of in accordance with the requirements of the Waste Management and Pollution Control Act 1998 at Imperial's own cost, as outlined in the Waste and Wastewater Management Plan (Appendix 06)</li> <li>ii. In relation to the risks of a pollution event that may occur unintentionally during the operations, Imperial believes; <ul style="list-style-type: none"> <li>a. impacts and risks associated with contamination of soil, surface water and groundwater are managed through meeting mandated requirements for well integrity and clean-up of spills and leaks and remediation of impacted soil</li> <li>b. impacts and risks associated with loss of containment of wastewater are managed through containment measures.</li> </ul> </li> <li>iii. In relation to full life cycle costs, and at the end of campaign, Imperial will take action to remove any residual pollution and waste as detailed by the EMP.</li> <li>iv. The Spill Management Plan (Appendix 07) includes commitments to immediately remediate spills and leaks, to reduce the risk of long-term contamination of the environment and avoid environmental impact legacies.</li> </ul>
<p>The following management hierarchies must be taken into consideration in the design of the proposed action.</p>		
<ul style="list-style-type: none"> <li>• Environmental decision-making hierarchy</li> </ul>	✓	<p>Section 26 (1) of the Environment Protection Act 2019 defines the relevant decision-making hierarchy in order of priority;</p> <ul style="list-style-type: none"> <li>(a) ensure that actions are designed to avoid adverse impacts on the environment;</li> <li>(b) identify management options to mitigate adverse impacts on the environment to the greatest extent practicable;</li> <li>(c) if appropriate, provide for environmental offsets in accordance with this Act for residual adverse impacts on the environment that cannot be avoided or mitigated.</li> </ul> <p>Imperial has taken the hierarchy into consideration as follows;</p> <ul style="list-style-type: none"> <li>(a) Site selection for infrastructure is guided by archaeological and environmental field studies (EMP Section 3.2 – Site Selection and Planning).</li> <li>(b) Imperial has completed a detailed risk assessment (Section 6 of the EMP) and developed comprehensive management plans based on the identified and assessed risks.</li> <li>(c) Imperial will decommission the wells in accordance with the Code of Practice Onshore Petroleum and remove all infrastructure and will</li> </ul>

Section 43 General duty	Done	Comment
		rehabilitate the CPP Area at the end of the campaign (EMP Appendix 03 – Rehabilitation Management Plan)
<ul style="list-style-type: none"> <li>Waste management hierarchy</li> </ul>	✓	Imperial have considered the waste management hierarchy in creation of the EMP Appendix 06 -Waste and Wastewater Management Plan. Section 2
<ul style="list-style-type: none"> <li>Existing threats and pressures on the environmental values</li> </ul>	✓	Imperial have considered existing threats and pressures on environmental values in the cumulative impacts section of the EMP – Cumulative Impacts – Section 3.10
<ul style="list-style-type: none"> <li>Impacts of a changing climate</li> </ul>	✓	The Activity is unlikely to have a significant impact on climate change if gas produced is recovered on an appraisal basis rather than flared. This appraisal gas production would be equivalent to approximately 475,000 t CO <sub>2</sub> -e/annum, if flared rather than exported to the McArthur River Gas Pipeline.
Other section 43 considerations		
<ul style="list-style-type: none"> <li>Have communities that may be affected by the proposed action been provided with information and opportunities for consultation?</li> </ul>	✓	Imperial has undertaken broad stakeholder engagement and consultation to provide information regarding the proposed Activity to directly and indirectly affected community members. The details of engagement and the information provided is documented in the EMP
<ul style="list-style-type: none"> <li>Has consultation with affected communities, including Aboriginal communities' been undertaken in a culturally appropriate manner?</li> </ul>	✓	Imperial has worked with the NLC to provide information about the proposed Activity to directly and indirectly affected communities through meetings at various locations throughout the region. Imperial has also hosted community drop-in sessions to present information about the proposed Activity with company representatives on hand to answer any questions and collate feedback.  Various methodologies have been used to communicate the information and the details of engagement and methodologies and the information provided is documented in the EMP
<ul style="list-style-type: none"> <li>Has community knowledge and understanding (including scientific and traditional knowledge and understanding) of the natural and cultural values of areas that may be impacted by the proposed action been sought and documented?</li> </ul>	✓	Imperial is required to be issued with a certificate from the Aboriginal Areas Protection Authority (AAPA) prior to commencing any on-ground activities. that protects sacred sites from damage by setting out the conditions for carrying out specific works on an area of land and/or sea.  In addition, Imperial work with the NLC to engage Cultural Heritage Monitors to undertake sacred site avoidance surveys and the monitors are present on site for any activities involving first disturbance.  Imperial participates in regular meetings with the directly affected communities at least annually to provide information about activities undertaken to date and the planned activities that will be undertaken in the next annual period.
<ul style="list-style-type: none"> <li>Have Aboriginal values and the rights and interests of Aboriginal communities' been addressed in relation to areas that may be impacted by the proposed action?</li> </ul>	✓	Consultation undertaken by Imperial, via the NLC, and AAPA considers the area of proposed activities that may be impacted. This provides an opportunity for Aboriginal communities to have direct engagement prior to any Activity commencing.