



## **Annual Report**

**Licence Year 6 of First Renewal Term**

**9 October 2013 to 8 October 2014**

**Petroleum Exploration Licence (PEL) 106**

**Cooper / Eromanga Basin  
South Australia**

8 December 2014

## **Contents**

1	Introduction .....	3
2	Licence Summary .....	3
3	Regulated Activities .....	5
	3.1 Seismic Data Processing / Reprocessing .....	5
	3.2 Well Completions and Production Testing .....	5
	3.3 Flowlines / Pipelines .....	5
4	Compliance Issues.....	6
	4.1 Licence and Regulatory Compliance .....	6
	4.2 Compliance with Statement of Environmental Objectives (SEOs) .....	6
	4.3 Management Systems Audit.....	7
	4.4 Reports and Data Submissions .....	8
	4.5 Incidents.....	10
	4.6 Threat Prevention .....	10
5	Statement of Expenditure.....	10
	Table 1 - Original Work Program Commitments by Licence Year .....	4
	Table 2 - Work Program and Work Completed by Licence Year .....	4
	Table 3 – Regulatory Non-compliances .....	6
	Table 4 – Report and Data Submissions .....	8
	Appendix 1 – Compliance with SEOs .....	11
	Appendix 2 – Expenditure Statement.....	27

## **1 Introduction**

Petroleum Exploration Licence (PEL) 106 was granted on 9 April 2003. The Licence is located on the western margin of the Cooper/Eromanga Basin, South Australia.

This report details the work completed by the holders of PEL 106 during the period 9 October 2013 to 8 October 2014 which represents Year 6 and the final year of the first renewal term. This Annual Report has been prepared by Beach Energy Limited in accordance with the requirements of Regulation 33 of the *Petroleum and Geothermal Energy Act 2013 (the Act)*.

## **2 Licence Summary**

PEL 106 was originally granted on 9 April 2003 to Great Artesian Oil & Gas Limited (GAOG) for a term of five years.

Beach Energy Limited (Beach) earned 50% interest in the Brownlow Block (PEL 106B) in accordance with the Farmin-In Agreement dated 18 October 2004 between Beach and GAOG.

Renewal of PEL 106 was granted for a further five year term commencing on 9 October 2008.

PEL 106 was divided on 3 January 2014 into PEL 106 (formerly PEL 106B) and PEL 632 (formerly PEL 106A).

PEL 106 is held by a joint venture between Beach (50% interest and operator) and GAOG (50% interest).

The holders of PEL 106 were granted PPL 239 on 17 August 2011 over the Middleton/Brownlow gas field (formerly PRL 25) and PPL 257 on 19 September 2014 over the Canunda/Coolawang gas field.

Prior to the expiry of PEL 106, the PEL 106 licensees applied for petroleum retention licences (PRLs) over the area of the permit. PRLs 129 and 130 were granted effective on 8 October 2014 for an initial five year term.

The original work commitments for the first renewal term of PEL 106 are detailed in Table 1.

Table 1 Original Work Program Commitments by Licence Year

Licence Year	Licence Dates	Minimum Work Program
1	9 Oct 2008 to 8 Oct 2009	Geological and Geophysical studies
2	9 Oct 2009 to 8 Oct 2010	Geological and Geophysical studies
3	9 Oct 2010 to 8 Oct 2011	Geological and Geophysical studies
4	9 Oct 2011 to 8 Oct 2012	Geological and Geophysical studies
5	9 Oct 2012 to 8 Oct 2013	Geological and Geophysical studies Drill one well

During the renewal term, the work commitments for PEL 106 were suspended and extended pursuant to section 76A of the Act, such that the licence term expired on 8 October 2014.

Table 2 summarises the work completed by the Joint Venture in the PEL 106 licence term. The minimum work commitments for the first renewal term have been exceeded.

Table 2 Work Completed by Licence Year

Licence Year	Licence Dates	Work Completed
1	9 Oct 2008 to 8 Oct 2009	Drill, Completion, EPT of Brownlow-1; Canunda-1
2	9 Oct 2009 to 8 Oct 2010	EPT of Brownlow-1; Canunda-1
3	9 Oct 2010 to 8 Oct 2011	Geological and Geophysical studies
4	9 Oct 2011 to 8 Oct 2012	Drill Baird-1, Admella-1, Coolawang-1, Haslam-1 Completion, Testing Canunda-1, Coolawang-1, Haslam-1 Acquired, processed 79 sq km Irus 3D seismic data
5	9 Oct 2012 to 8 Oct 2013	Drill Coorabie-1 , Rosetta-1 , Destrees-1, Euler-1
6	9 Oct 2013 to 8 Oct 2014	Geological and Geophysical studies

### 3 Regulated Activity

Pursuant to Regulations 33(3) (a) an annual report must include:  
*“a summary of the regulated activities conducted during the licence year.”*

#### 3.1 Seismic Data Processing / Reprocessing

The Irus 3D seismic survey, acquired in September – November 2012, was processed by CGGVeritas Services in Perth and the azimuthal processing was completed December 2013. In addition, subsets of the Neritus, Spinal and Raven 3D seismic datasets were merged with the Irus 3D data to create a single volume. Simultaneous inversion processing of the dataset is being by Ikonscience.

#### 3.2 Well Completions and Production Testing

Well	Activity	Timeframe
Coolawang-1	Perforated tubing and performed flow build-up test	25-31 January 2014

Extended Production Testing (EPT) of the Canunda-1 well continued through the period 9 October 2013 to 8 October 2014 via 6-month extensions to the original and subsequent exemptions to Section 27 (2) of the *Petroleum and Geothermal Energy Act 2000*. Approvals for the EPT operations at Canunda-1 was conditional on Beach committing to achieving the objectives defined in Beach Energy’s “Statement of Environmental Objectives – Cooper Basin Petroleum Production Operations (November 2003)”. On 19 September 2014, the licensees were granted a petroleum production licence (PPL 257) over the Canunda/Coolawang gas field.

#### 3.3 Flowlines / Pipelines

No new flowlines/pipelines were constructed during the licence year. The Canunda to Middleton pipeline was commissioned in April 2013 and is operated and maintained in accordance with the requirements of AS 2885 Pipelines – Gas and Liquid Petroleum.

## 4 Compliance Issues

Pursuant to Regulations 33(3) (b) & (c) an annual report must include:

*“A report for the year on compliance with the Act, these regulations, the licence and any relevant statement of environmental objectives;” and*

*“A statement concerning any action to rectify non-compliance with obligations imposed by the Act, these regulations or the licence, and to minimise the likelihood of recurrence of any such non-compliances.”*

### 4.1 Licence and Regulatory Compliance

There were instances in the current reporting period in which the PEL 106 Operator did not provide data submissions within the required timeframes pursuant to section 40, 42 and 43 of the of the Petroleum and Geothermal Energy Regulations 2013 (the Regulations). A summary of the non-compliance is provided in Table 3.

Table 3 - Regulatory non-compliances

Activity	Details of Non-Compliance	Rectification of Non-Compliance
Submission of well completion report	Regulation 40 – Euler-1, Destress-1, Rosetta-1 and Coorabie-1 well completion reports submitted late due to late submission of data from contractors	Data submitted. Ongoing discussions with contractors regarding resourcing issues. Operator to apply for extension of time to avoid non-compliance
Submission well test analysis reports and fluid analysis reports	Regulation 42 and 43 – late submission of well test data	Data submitted. Systems and processes reviewed and updated to ensure submission of well test reports
Annual Report	Regulation 33 – Late submission of Annual Report	Report submitted.

### 4.2 Compliance with Statement of Environmental Objectives (SEO)

Production testing activities were undertaken in accordance with the *Statement of Environmental Objectives for Petroleum Production Operations* (the **Production SEO**). A statement of compliance against all the Production SEO is provided in Appendix 1.

### 4.3 Management System Audits

Pursuant to Regulation 33(3) (d) an annual report must include:

*“a summary of any management system audits undertaken during the relevant licence year including information on any failure or deficiency identified by the audit and any corrective actions that has, or will be taken”.*

The following Management System audits and reviews were undertaken during the current reporting period:

#### Contractor Management

- A comprehensive review of Beach Energy’s contractor management processes, policies and governance arrangements was undertaken. As a result of this review there was a comprehensive suite of recommendations that are in the process of being implemented.

#### HSE Systems Audit

- An independent HSE Management Systems audit was conducted to measure the improvements and application of Beach’s HSE Management System over the previous 12 months. The results of this audit will assist in the continuous improvement of Beach’s HSE system. Recommendations assist with the establishment of next year’s HSE objectives.

#### Fit for Work

- The development of a Fit for Work policy and associated procedures has commenced.

#### Firefighting Capabilities

- An audit of the current firefighting capabilities and any associated possible fire risks within Beach’s Cooper Basin operations. The recommendations from this audit are being reviewed for implementation.

#### Ongoing Projects

- Updating of Incident Reporting and Management.
- Audits of the extent to which the Beach HSE standards are being “lived” to the levels expected of and required at Beach.

#### 4.4 Report and Data Submissions

Pursuant to Regulation 33(3) (e) an annual report must include:

*“a list of all reports and data relevant to the operation of the Act generated by the licensee during the licence year”.*

A list of the reports and data generated and samples submitted to Department of State Development in relation to the operations undertaken during the current reporting period for PEL 106 is provided in Table 4.

Table 4 - Reports and Data Submissions

##### *Quarterly Incident Reports (Regulation 32)*

Report / Data	Date Due	Date Submitted	Compliant
3rd Quarter 2013	31 October 2013	31 October 2013	Compliant
4th Quarter 2013	31 January 2014	31 January 2014	Compliant
1st Quarter 2014	30 April 2014	30 April 2014	Compliant
2nd Quarter 2014	31 July 2014	31 July 2014	Compliant

##### *Annual Reports (Regulation 33)*

PEL 106 Licence Year 5	8 December 2013	25 February 2015	Non-Compliant
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##### *Geophysical Reports (Regulations 35, 36 & 37)*

Irus 3D Geophysical Operations Report	31 January 2014 <sup>(1)</sup>	30 January 2014	Compliant
Irus 3D Data	31 January 2014 <sup>(1)</sup>	30 January 2014	Compliant

##### *Well Completion Reports (Regulation 40)<sup>1</sup>*

Coorabie-1	30 June 2013	8 November 2013	Non-Compliant
Rosetta-1	17 July 2013	28 October 2013	Non-Compliant
Destrees-1	20 August 2013	11 November 2013	Non-Compliant
Euler-1	1 January 2014	24 February 2014	Non-Compliant

##### *Well Samples (Regulation 48)*

Euler-1	1 January 2013	30 January 2014	Compliant <sup>(1)</sup>
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*Quarterly Cased Hole Well Activity Report (Regulation 41)*

3rd Quarter 2013	31 October 2013	28 October 2013	Compliant
4th Quarter 2013	31 January 2014	31 January 2014	Compliant
1st Quarter 2014	30 April 2014	30 April 2014	Compliant
2nd Quarter 2014	31 July 2014	31 July 2014	Compliant

*Down Hole Diagrams (Regulation 44)*

Coolawang-1	1 April 2014	21 February 2014	Compliant
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*Well Test Analysis Report (Regulation 42)*

Canunda-1	20 October 2011	17 June 2014	Non-Compliant
Coolawang-1	30 February 2013	17 June 2014	Non-Compliant
Haslam-1	25 March 2013	17 June 2014	Non-Compliant

*Petroleum Reservoir Fluid Analysis Report (Regulation 43)*

Canunda-1	20 November 2010	17 June 2014	Non-Compliant
Coolawang-1	11 February 2013	17 June 2014	Non-Compliant
Haslam-1	11 March 2013	17 June 2014	Non-Compliant

*Monthly Production Reports (Regulation 45)*

August 2013	31 October 2014	30 October 2013	Compliant
September 2013	30 November 2013	11 November 2013	Compliant
October 2013	31 December 2013	6 December 2013	Compliant
November 2013	31 January 2014	7 January 2014	Compliant
December 2013	28 February 2014	29 January 2014	Compliant
January 2014	31 March 2014	11 March 2014	Compliant
February 2014	30 April 2014	27 March 2014	Compliant
March 2014	31 May 2014	28 April 2014	Compliant
April 2014	30 June 2014	29 May 2014	Compliant
May 2014	31 July 2014	26 June 2014	Compliant
June 2014	31 August 2014	25 July 2014	Compliant
July 2014	30 September 2014	27 August 2014	Compliant
August 2014	30 October 2014	30 September 2014	Compliant

- (1) Well Samples (cuttings) at Challenger within 6 months but delivered late to core library. Department of State Development advise that if samples are at Challenger, it is considered complaint under Regulation 40.

#### 4.5 Incidents

Pursuant to Regulation 33(3) (f) an annual report must include:

*“In relation to any incidents reported to the Minister under the Act and these Regulations during the relevant licence year –*

- (i) an overall assessment and analysis of the incidents, including the identification and analysis of any trends that have emerged; and*
- (ii) An overall assessment of the effectiveness of any action taken to rectify non-compliance with obligations imposed by the Act, these regulations or the licence, or to minimise the risk of recurrence of any such non-compliance”.*

There were no reportable incidents or serious incidents during the reporting period as defined in section 85(1) of the Act and the Production SEO.

#### 4.6 Threat Prevention

Pursuant to Regulation 33(2) (g) under the Act, an annual report must include:

*“a report on any reasonably foreseeable threats (other than threats previously reported on) that reasonably present, or may present, a hazard to facilities or activities under the licence, and a report on any corrective action that has, or will be taken”.*

There are no foreseeable threats to the proposed exploration activities for PEL 106.

#### 5. Expenditure Statement

Pursuant to Regulation 33(4) an annual report must contain:

*“An annual report must be accompanied by a statement of expenditure on regulated activities conducted under the licence for the relevant licence year, showing expenditure under each of the following headings:*

- (a) drilling activities;*
- (b) seismic activities;*
- (c) technical evaluation and analysis;*
- (d) other surveys;*
- (e) facility construction and modification;*
- (f) operating and administration expenses (not already covered under another heading)”.*

An Expenditure Summary for PEL 106 for the period 9 October 2013 to 8 October 2014 is presented in [Appendix 2](#).

## Appendix 1

### Compliance with the Statement of Environmental Objectives Cooper Basin Petroleum Production Operations (Revised November 2009)

Objectives/ Goals	Assessment Criteria	Compliant / Non-compliant	Comments
<b>1. To avoid unnecessary disturbance to 3<sup>rd</sup> party infrastructure, landholders or land use.</b>			
<b>1.1 To minimise disturbance or damage to infrastructure / land use and remediate where disturbance cannot be avoided.</b>	Where disturbance is unavoidable or accidental, infrastructure or land use is restored to as is reasonably appropriate to the original undisturbed condition or as agreed with the landholder	<b>Compliant</b>	Rehabilitation will be undertaken in consultation with the landowner and to the satisfaction of the regulator when the economically viable life of the field ceases.
	<p>No unresolved reasonable landholder/3<sup>rd</sup> party complaints</p> <p>Landholder activities not restricted or disturbed as a result of activities unless by prior arrangement.</p>	<b>Compliant</b>	<p>All facilities are at least 30kms from the nearest dwelling.</p> <p>There has been no unresolved landholder or 3<sup>rd</sup> party complaints during the reporting period.</p> <p>Landholder activities have not been disturbed or restricted by the site operations.</p> <p>Regular liaison with landowner provides advance warning of any significant developments or activities.</p>

Objectives/ Goals	Assessment Criteria	Compliant / Non-compliant	Comments
<b>2. To maintain soil stability / integrity</b>			
<b>2.1 To remediate erosion as a result of production operations in a timely manner</b>	The extent of soil erosion is consistent or less than surrounding land.	<b>Compliant</b>	<p>No significant erosion has been reported at any neither of the facilities nor along the access roads to them within the reporting period.</p> <p>Topsoil was stockpiled when the sites were originally cleared for the drilling operations of each well.</p> <p>Refer to comments for Section 1.1 above regarding rehabilitation.</p>



**3. To minimise disturbance to native vegetation and native fauna.**

**3.1 To maintain regrowth of native vegetation on reinstated areas to be consistent with surrounding area**

Species abundance and distribution on the reinstated areas was consistent with the surrounding area

Note: assessment of the consistency with surrounding areas will take into account that regrowth is a time and rainfall dependent process

0, +1 or +2 GAS criteria for borrow pit construction and rehabilitation are attained (Appendix B).

**Compliant**

Refer to comments for Section 1.1 above regarding rehabilitation.

<p><b>3.2 To minimise additional clearing of native vegetation as part of production activities</b></p>	<p>Vegetation clearing is limited to previously disturbed areas or areas assessed to be of lowest sensitivity</p> <p>No rare, vulnerable or endangered flora removed without appropriate permits</p> <p>No production activities undertaken on salt lakes, steep tableland land systems or wetlands land systems (as defined in the EIR)</p> <p>0, +1 or +2 GAS criteria for borrow pit construction and rehabilitation are attained.</p>	<p><b>Compliant</b></p>	<p>No further vegetation clearing was undertaken for production related activities during the reporting period.</p>
<p><b>3.3 To achieve a significant environmental benefit for native vegetation clearance</b></p>	<p>Significant environmental benefit for native vegetation clearance approved by PIRSA (where delegated authority applies ) or Native Vegetation Council.</p> <p>Significant environmental benefit obligations satisfied / implemented.</p>	<p><b>Compliant</b></p>	<p>SEB obligations are incurred for activities relating to Petroleum Production Licences only.</p>

<p><b>3.4 To ensure production activities are planned and conducted in a manner that minimises impacts on native fauna</b></p>	<p>Vegetation clearing is limited to previously disturbed areas or areas assessed to be of lowest sensitivity</p> <p>No rare, vulnerable or endangered fauna removed without appropriate permits</p> <p>0, +1 or +2 GAS criteria for borrow pit construction and rehabilitation are attained .</p>	<p><b>Compliant</b></p>	<p>There has been no further vegetation cleared within the reporting period.</p>
<p><b>3.5 To minimise disturbance of aquatic habitats (specifically wetlands, permanent waterholes and flowing water courses)</b></p>	<p>Works in aquatic habitats (e.g. flowing watercourses) has been approved by DSD</p>	<p><b>Compliant</b></p>	<p>EPT facilities are located several kilometres from the nearest significant watercourse (Cooper Creek), which flows only during large flood events.</p>
<p><b>4. To prevent the introduction or spread of weeds, pathogens and pest fauna.</b></p>			

<p><b><i>4.1 To ensure that weeds, pathogens and pest fauna are controlled at a level that is at least consistent with adjacent land.</i></b></p>	<p>The presence of weeds and pathogens is consistent with or better than adjacent land</p> <p>No new outbreak or spread of weeds reported</p>	<p><b>Compliant</b></p>	<p>Operations personnel regularly undertake inspections of operational areas within the licence area. There have been no reports of weed outbreaks within the reporting period.</p>
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**5. To minimise the impact of the production operations on water resources**

<p><b>5.1 To maintain current surface drainage patterns.</b></p>	<p>For excavations, surface drainage profiles area restored to as is reasonably consistent with surrounding area</p> <p>For existing easements, drainage is maintained similar to pre-existing conditions.</p>	<p><b>Compliant</b></p>	<p>Refer to comments for Section 3.5 above regarding the locations of the EPT facilities in regard to their potential for inundation from flood waters.</p>
<p><b>5.2 To minimise impact to aquifers / groundwater volumes and flow patterns.</b></p>	<p>Volume of water produced is recorded.</p> <p>No uncontrolled flow to the surface (i.e. no free flowing bores)</p> <p>Note: the “Cooper Basin Drilling and well Operations” SEO provides detail on aquifer issues</p>	<p><b>Compliant</b></p>	<p>There has been no uncontrolled flow of fluids to the surface.</p> <p>There are no water separation facilities at the EPT site, and hence no evaporation ponds which could potentially cause interference with shallow groundwater, through seepage.</p>

<b>6. To avoid land or water contamination</b>			
<p><b>6.1 To prevent spills occurring and if they occur minimise their impact.</b></p>	<p>No evidence of any spills or leaks to areas not designated to contain spills</p> <p>In the event of a spill, the spill was:</p> <ul style="list-style-type: none"> <li>▪ Contained</li> <li>▪ Reported</li> <li>▪ Cleaned-up</li> <li>▪ Cause investigated and corrective</li> <li>▪ and/or preventative action implemented</li> </ul> <p>Compliance with the Environment Protection Act, Australian Standard 1940 and the Australian Dangerous Goods Code.</p>	<p><b>Compliant</b></p>	<p>There have been no spills or leaks with in the reporting period.</p>

<p><b>6.2 To remediate and monitor areas of known contamination arising from production activities (salinisation, hydrocarbons, other production chemicals ).</b></p>	<p>Contamination restricted to known areas and remediation strategies investigated and implemented where practical.</p> <p>Level of hydrocarbon contamination continually decreasing, ultimately to meet Environment Protection Authority (EPA) guidelines<sup>1</sup>.</p>	<p><b>Compliant</b></p>	<p>There has been no contamination in the licence area within this reporting period.</p>
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<sup>1</sup> Soil Health Index (SHI) study is currently being undertaken by Santos, in consultation with PIRSA and EPA. The results of this study will provide a proforma for establishing site-specific bench marks for soil remediation.

<p><b>6.3 To ensure that rubbish and waste material is disposed of in an appropriate manner</b></p>	<p>No evidence of rubbish or litter on easements or at facilities.</p> <p>No evidence that waste material is not contained and disposed of in accordance with Beach approved procedures.</p> <p>Evidence of waste tracking certificates for prescribed wastes.</p> <p>Evidence of compliance with any waste disposal licence conditions (e.g. EPA permits )</p>	<p><b>Compliant</b></p>	<p>All waste material has been and continues to be disposed of in accordance with Beach approved procedures.</p>
<p><b>6.4 To prevent impacts as a result of hydrotest water and waste water (e.g. washdown water) disposal.</b></p>	<p>No evidence of impacts to soil, water and vegetation as a result of water disposal (i.e. soil erosion, dead vegetation, water discoloration)</p>	<p><b>Compliant</b></p>	<p>All fluids were contained to designated areas.</p>
<p><b>6.5 To ensure the safe and appropriate disposal of grey water ( sullage, sewage ).</b></p>	<p>Wastewater disposed of in a manner that minimises risk to the environment and public health</p> <p>Compliance with Environment Protection Act</p>	<p><i>Not applicable to this licence area</i></p>	

<p><b>6.6 To minimise impacts as a result of produced formation water treatment and disposal and restrict to defined areas.</b></p>	<p>Water monitoring results indicated levels of Total Petroleum Hydrocarbons (TPH) below 30mg/L in banded holding ponds and 10mg/L in banded and / or freeform evaporation ponds</p> <p>No evidence of overflow of product from interceptor pit.</p> <p>No evidence of hydrocarbon contamination immediately adjacent to banded ponds.</p>	<p><i>Not applicable to this licence area</i></p>	<p>There are no holding or evaporation ponds with in the licence area.</p>
<p><b>6.7 To minimise impacts as a result of land treatment units and restrict to defined areas</b></p>	<p>Periodic reports as required detail quantity, level of contamination and proposed ongoing operation of the Land Treatment Unit</p>	<p><i>Not applicable to this licence area</i></p>	

**7. To minimise the risk to public health and safety**

<p><b>7.1 To adequately protect public safety during normal production operations</b></p>	<p>No injuries or incidents involving the public.                  Demonstrated compliance with relevant standards                   Emergency procedures implemented and personnel trained.</p>	<p><b>Compliant</b></p>	<p>No incidents of risk to public health and safety during the reporting period.                   The access roads to the EPT fields are not available for use by the public.</p>
<p><b>7.2 To avoid fires associated with production activities.</b></p>	<p>No uncontrolled operations related <b>fires</b>.                   Emergency procedures implemented and personnel trained.</p>	<p><b>Compliant</b></p>	<p>No uncontrolled fires occurred at any facility during the reporting period.                   Beach have an emergency response procedure and operations staff undergo emergency response training drills on a regular basis.</p>
<p><b>7.3 To prevent unauthorised access to production facilities</b></p>	<p>No unauthorised activity.</p>	<p><b>Compliant</b></p>	<p>There were no incidents of unauthorised entry within the licence area.</p>

**8. To Minimise impact of emergency situations**

<p><b>8.1 To minimise the impact as a result of an emergency situation or incident</b></p>	<p>Emergency response procedures are effectively implemented in the event of an emergency.</p> <p>Emergency response exercises are aligned with credible threats and consequences identified in the risk assessment.</p>	<p><b>Compliant</b></p>	<p>No emergency situations arose within the licence area during the reporting period.</p> <p>Beach Petroleum HSE system includes periodic simulation of Emergency situations.</p>
<p><b>8.2 To restore any damage that may occur as a result of an emergency situation.</b></p>	<p>Refer to previous criteria ( Objective 1, 2, 3 &amp; 6 )</p>	<p><b>Compliant</b></p>	

**9. To minimise noise due to operations.**

<p><b>9.1</b> <i>To take reasonable practical measures to comply with noise standards</i></p>	<p>Operational activities have taken reasonable practical measures to comply with noise regulations, under the Environment Protection Act 1993</p> <p>No unresolved reasonable complaints.</p>	<p><b>Compliant</b></p>	<p>The EPT sites are at least 30 kms from the nearest dwelling.</p>
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**10. To minimise atmospheric emissions.**

<p><b>10.1</b> <i>To minimise uncontrolled atmospheric emissions</i></p>	<p>Reasonable practical measures implemented in design and operation to minimise emissions.</p>	<p><b>Compliant</b></p>	
<p><b>10.2</b> <i>To minimise controlled atmospheric emissions</i></p>	<p>Reasonable practical measures implemented in design and operation to minimise emissions</p>	<p><b>Compliant</b></p>	

<p><b>10.3 To minimise the generation of dust</b></p>	<p>No reasonable complaints received</p> <p>No dust related injuries recorded</p>	<p><b>Compliant</b></p>	<p>Access roads are continually watered and maintained to minimise dust.</p>
<p><b>11. To adequately protect cultural heritage sites and values during operations and maintenance</b></p>			
<p><b>11.1 To ensure that identified cultural sites are not disturbed.</b></p>	<p>Proposed construction areas and access tracks surveyed by relevant cultural heritage group</p> <p>Any new sites identified are recorded and reported to appropriate authority</p> <p>No impact to identified sites</p>	<p><b>Compliant</b></p>	