



Annual Report

Licence Year 7 of First Renewal Term

5 June 2014 to 15 December 2014

Petroleum Exploration Licence (PEL) 91

**Cooper / Eromanga Basin
South Australia**

27 February 2015

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1 Introduction

Petroleum Exploration Licence (PEL) 91 was granted on 8 January 2002. The Licence is located on the western margin of the Cooper/Eromanga Basin, South Australia.

This report details the work conducted during the period 5 June 2014 to 15 December 2014 which represents licence Year 7 and the final year of the first renewal term. This Annual Report has been prepared in accordance with Regulation 33 of the *Petroleum and Geothermal Energy Act 2000* (the Act).

2 Licence Summary

PEL 91 was originally awarded in January 2002 to Great Artesian Oil and Gas (GAOG) (formerly Tyers Investments), 100% interest.

Beach Petroleum Limited farmed into the Licence in December 2002 and became the Operator. The participating interests in PEL 91 subsequently became:

- GAOG 60%
- Beach Petroleum Limited (Operator) 40%

The Licence was renewed effective 5 June 2008 for a further five year term following 33.3 percentage relinquishment of the original licence area. The registered interests in PEL 91 as at 15 December 2014 were:

- GAOG 60%
- Beach Energy Limited (Beach) (Operator) 40%

During the current term, the holders of PEL 91 were granted Petroleum Production Licences (PPLs) over the Greater Bauer oilfield (PPL 253), Congony-Kalladeina oilfield (PPL 254), Hanson-Snelling oilfield (PPL 255) and Sceale oilfield (PPL 256).

The PEL 91 licensees applied for petroleum retention licences (PRLs) over the area of PEL 91. PRLs 151 to 176 were awarded effective on 16 December 2014. As a consequence of grant of PRLs 151 to 176, the PEL 91 licence term ended with effect on 15 December 2014.

The work commitments for the first renewal term of PEL 91 are detailed in Table 1.

Table 2 summarises the work completed by the Joint Venture as at 15 December 2014. The PEL 91 licensees satisfied the PEL 91 work program for the first renewal term.

Table 1 - Work Program Commitments by Licence Year

Licence Year	Licence Dates	Minimum Work Program
Year 1	5 June 2008 to 4 June 2009	Geological and Geophysical Studies
Year 2	5 June 2009 to 4 June 2012	100km of 2D seismic acquisition Geological and Geophysical Studies
Year 3	5 June 2010 to 4 June 2013	Geological and Geophysical Studies
Year 4	5 June 2011 to 4 June 2014	Geological and Geophysical Studies
Year 5	5 June 2012 to 4 June 2015	Geological and Geophysical Studies Drill one well

Table 2 - Work Program and Work Completed by Licence Year

Licence Year	Minimum Work Program	Work Completed
Year 1	Geological and Geophysical studies	Modiolus 3D seismic survey, plus Geological and Geophysical studies
Year 2	100km of 2D seismic acquisition Geological and Geophysical studies	Chiton-1 and Marino-1 exploration wells, plus Geological and Geophysical studies
Year 3	Geological and Geophysical studies	Hanson-1
Year 4	Geological and Geophysical studies	Snellings-1, Arno-1, Bauer-1, Bauer-2, Bauer-3, Bauer-4, Searcy-1, Basham-1. Undatus 2D , Aquillus 3D & Limbatus 3D
Year 5	Geological and Geophysical studies; Drill one well	12 wells ⁽¹⁾ Caseolus 3D and Irus 3D
Year 6		13 wells ⁽²⁾
Year 7		5 wells ⁽³⁾

⁽¹⁾ Pennington-1, Kalladeina-2, Smoky-1, Sceale-1 and Congony-1 and Bauer-5, 6, 7, 8, 9, 10, Bauer North-1

⁽²⁾ Bauer-11, Chiton-2, Guichen-1, Pondalowie-1, Neaves-1, Chiton-3, Bales-1, Bauer-12, Bauer-13, Stunsail-1, Hardwicke-1, Pennington-2, Pennington North-1

⁽³⁾ Balgowan-1, Burners-1, Stunsail-2, Karrata-1, Pennington-3

2.1 Associated Activities Licences

Three AALs, granted as adjuncts to PEL 91, were active during the reporting period.

AAL 180 was originally granted on 20 August 2012 and varied on 15 March 2013 for the construction, maintenance and operation of the Bauer to Lycium oil pipeline. AAL 180 was renewed for a further 12 months and expired on 19 August 2014.

AAL 197 was granted on 9 October 2013 for 12 months to allow for the acquisition of the Solidus 3D seismic survey in an area outside of PEL 91. The AAL licence condition (carrying out of the Solidus 3D seismic survey) was suspended and the term of AAL 197 was extended such that AAL 197 expired on 4 June 2015. As a consequence of grant of PRLs 151 to 176, the AAL 197 licence term ended with effect on 15 December 2014.

AAL 198 was granted on 20 November 2013 for 12 months to allow for the acquisition of the Vermetus 2D seismic survey in an area outside of PEL 91. No regulated activities were carried out in AAL 198 and AAL 198 expired on 19 November 2014.

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 Acquisition

Line preparation on the Solidus 3D Seismic Survey, in PEL 91, commenced on the 8 September 2014 and was completed on the 23 November 2014. Recording commenced on the 14 October 2014 and was completed on the 10 December 2014. The Solidus 3D covered an area of 495 square km.

3.2 Seismic Data Processing / Reprocessing

Processing for the PEL 91 Solidus 3D has not started by the 16th of December. There were no other processing projects in PEL during this period.

3.3 Drilling

Appraisal Wells

The Stunsail-2 appraisal well was drilled targeting a subculmination 760 metres to the south-east of Stunsail-1. The well was drilled to a depth of 1,461 metres, and failed to encounter hydrocarbons in the primary McKinlay/ Namur objective. Strong oil shows were

intersected in the Birkhead Formation, which were tested via drill stem test, however failed to recover hydrocarbons. Despite the well being plugged and abandoned, preliminary mapping indicates the field reserves will remain unchanged.

Pennington-3 was an aggressive step out appraisal well cored through the Namur and Mid-Namur Sandstone sections. Oil shows were identified in the McKinlay Member, however this interval was assessed as being uneconomic to complete, resulting in the well being plugged and abandoned. Pennington-3 provided structural information on the western edge of the Pennington field, which will assist with determining facility and pipeline sizes.

Exploration Wells

Balgowan-1 was cased and suspended after intersecting an oil bearing reservoir with 3.5 metres of net pay in the Namur Sandstone and two metres of net pay in the McKinlay Member. This discovery confirms the extension of the oil fairway to the north-east of recent discoveries in PEL 91 and brings a new focus on a number of other prospects in this northern area of the permit.

Burners-1 intersected one metre of net pay in the Namur Sandstone, overlain by a five metre oil bearing interval within the McKinlay Member. A drill stem test over 1,411 metres to 1,418 metres in the McKinlay Member recovered 5.1 bbl of oil during a four hour test. The well was cased and suspended as a future oil producer.

The Karrata-1 gas exploration well was plugged and abandoned as a result of insufficient net pay identified in the primary Patchawarra Formation for the well to be economic.

A summary of the wells drilled in PEL 91 during the reporting period is provided in below Table 3.

Table 3 - Summary of Wells Drilled in PEL 91 in Licence Year 7

Well Name	Balgowan-1
Type of well	Vertical oil exploration well
Contractor	Ensign International Energy Services – Rig 930
Date Spudded	4 August 2014
Status	Cased and Suspended
Rig release	13 August 2014
Pad & Track construction	Earthworks for access and lease were carried out in accordance with the SEO for Drilling and Well Operations in SA Cooper Basin
Borrow Pit construction	Borrow pits are constructed in accordance with the SEO for Petroleum Production Operations in SA Cooper Basin which requires borrow pits to be sited at least 10 metres from all roads and 50 m from public roads. Rehabilitation will be undertaken in accordance with guidelines.

Well Name	Burners-1
Type of well	Vertical oil exploration well
Contractor	Ensign International Energy Services – Rig 930
Date Spudded	18 August 2014
Status	Cased and Suspended
Rig release	31 August 2013
Pad & Track construction	Earthworks for access and lease were carried out in accordance with the SEO for Drilling and Well Operations in SA Cooper Basin
Borrow Pit construction	Borrow pits are constructed in accordance with the SEO for Petroleum Production Operations in SA Cooper Basin which requires borrow pits to be sited at least 10 metres from all roads and 50 m from public roads. Rehabilitation will be undertaken in accordance with guidelines.

Well Name	Karrata-1
Type of well	Vertical gas exploration well
Contractor	Ensign International Energy Services – Rig 965
Date Spudded	7 September 2014
Status	Plugged and Abandoned
Rig release	25 September 2014
Pad & Track construction	Earthworks for access and lease were carried out in accordance with the SEO for Drilling and Well Operations in SA Cooper Basin
Borrow Pit construction	Borrow pits are constructed in accordance with the SEO for Petroleum Production Operations in SA Cooper Basin which requires borrow pits to be sited at least 10 metres from all roads and 50 m from public roads. Rehabilitation will be undertaken in accordance with guidelines.

Well Name	Stunsail-2
Type of well	Vertical oil appraisal well
Contractor	Ensign International Energy Services – Rig 930
Date Spudded	4 September 2014
Status	Plugged and Abandoned
Rig release	15 September 2014
Pad & Track construction	Earthworks for access and lease were carried out in accordance with the SEO for Drilling and Well Operations in SA Cooper Basin
Borrow Pit construction	Borrow pits are constructed in accordance with the SEO for Petroleum Production Operations in SA Cooper Basin which

	requires borrow pits to be sited at least 10 metres from all roads and 50 m from public roads. Rehabilitation will be undertaken in accordance with guidelines.
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Well Name	Pennington-3
Type of well	Vertical oil appraisal well
Contractor	Ensign International Energy Services – Rig 930
Date Spudded	20 September 2014
Status	Plugged and Abandoned
Rig release	6 October 2014
Pad & Track construction	Earthworks for access and lease were carried out in accordance with the SEO for Drilling and Well Operations in SA Cooper Basin
Borrow Pit construction	Borrow pits are constructed in accordance with the SEO for Petroleum Production Operations in SA Cooper Basin which requires borrow pits to be sited at least 10 metres from all roads and 50 m from public roads. Rehabilitation will be undertaken in accordance with guidelines.

3.4 Well Completions and Production Testing

Balgowan-1 was completed as a single string free-flow oil producer from the McKinlay Member and Namur Sandstone and is currently shut in awaiting facility construction and connection.

Pennington-2 was completed as a single string free-flow oil producer from the McKinlay Member and Namur Sandstone and is currently shut in awaiting facility construction and connection.

Stunsail-1 was completed as a dual-zone free-flow oil producer from the McKinlay/Top Namur and Mid-Namur reservoirs and is currently shut in awaiting facility construction and connection.

Bauer-14 was completed as a single string free-flow oil producer from the McKinlay Member and Bauer-15, -16, -17, -18 and -19 were completed as single string free-flow oil producers from the Namur Sandstone. Bauer-14 and -15 were connected to the Bauer facility via above ground flowlines and Bauer-16 to – 19 are shut in awaiting flowline connection.

Prior to the grant of Petroleum Production Licences on 13 August 2014, the following wells were on extended production testing:

- Bauer 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 and 13
- Chiton-1 and 2
- Hanson-1

3.5 Facilities and Flowlines

A common production facility was constructed to service the Congony, Kalladeina and Sceale (CKS) oil fields. The facility comprises of one horizontal separator tank, two crude oil storage tanks (with provision for future expansion) and truck load out facility to export crude via tanker road train to the Moomba Load-In Load-Out (LiLo) facility. Produced formation water is treated through a series of interceptor/settling ponds with disposal to a free-form evaporation area. Congony-1, Kalladeina-1 and Sceale-1 are connected to the facility via surface laid steel flowlines.

New above ground flowlines were constructed in the Bauer field to deliver production from the Bauer 12 and 13 wells to the Bauer Facility. Several other flowlines that serviced two wells were duplicated to allow each well to have its own flowline. Before the flowline duplication, production from the Bauer 9 well shared a flowline with production from Bauer 5 well, production from the Bauer 11 and 8 wells shared a flowline, as did the Bauer 10 and Bauer 7 wells. Individual flowlines allow higher production rates and more accurate production data from well metering.

Above-ground flowlines are installed in accordance with *Beach Design and Construct Procedure 08 – EUE Flowlines and AS 2885*. Standard procedure is to select routes which minimise disturbance to local vegetation during construction and to facilitate ongoing monitoring and inspections.

Environmental assessments are conducted by appropriately experienced personnel, which take into account the impacts to native vegetation and habitat prior to the construction of all flowlines. From an environmental perspective ‘above ground’ flowlines are very low impact because depending upon location they require very little, if any, clearing of native vegetation.

A permanent camp was constructed at the Bales wellsite to accommodate production operators and construction crews working at nearby fields within the permit. The camp consists of sleeping, office, kitchen, dining and ablution buildings, reverse osmosis system for drinking water, waste water system with a lined evaporation lagoon, workshops and vehicle parking.

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 regulation, 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 likelihood of recurrence of any such non-compliances”.

4.1 Licence and Regulatory Compliance

There were cases during the current reporting period in which the PEL 91 Operator failed to submit reports in the required timeframe pursuant to Regulation 39 of the Petroleum and Geothermal Energy Regulations 2013 (the Regulations). A summary of the non-compliances is provided in Table 4. With the exception of the incidents listed below, the PEL 91 licensee complied with the Act, the Regulations and the Licence.

Table 4 - Regulatory non-compliances in Licence Year 7

Activity	Details of Non-Compliance	Rectification of Non-Compliance
Submission of Wireline logs	Regulation 39 – Late submission of logs	In some cases 2 week extensions of time were requested and granted. However, in some cases logs were over 1-2 months late. Ongoing discussions with contractors regarding resourcing issues

4.2 Compliance with Statement of Environmental Objectives (SEO)

4.2.1 Seismic

Seismic activities were undertaken in accordance with the *South Australia Cooper Basin and Arid Regions Statement of Environmental Objectives Geophysical Operations* (Santos, June 2006) (the *Seismic SEO*). A statement of compliance against all the Seismic SEO is provided in Appendix 1.

4.2.2 Drilling

Drilling and well activities were undertaken in accordance with the *Statement of Environmental Objectives - Drilling and Well Operations* (Santos, November 2009) (the *Drilling SEO*). A statement of compliance against all the Drilling SEO is provided in Appendix 2.

4.2.3 Production

Production activities (and borrow pit construction) were undertaken in accordance with the *Statement of Environmental Objectives for. Statement of Environmental Objectives – Cooper Basin Petroleum Production Operations* (Beach, 2009) (the Production SEO). A statement of compliance against all the Production SEO is provided in Appendix 3.

4.3 Management System Audits

Pursuant to Regulation 33(3) (d) under the Act, 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) under the Act, 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 91 is provided in Table 5.

Table 5 - Reports and Data submitted to the Department of State Development

Quarterly Incident Reports (Regulation 32)

Report / Data	Date Due	Date Submitted	Compliant
2nd Quarter 2014	30 July 2014	23 July 2014	Compliant
3rd Quarter 2014	30 October 2014	29 October 2014	Compliant

Annual Reports (Regulation 33)

PEL 91 Licence Year 6	4 August 2014	4 August 2014	Compliant
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Geophysical Reports (Regulations 35, 36 & 37)

Caseolus final reports, field tapes and processed data	29 August 2014 ⁽¹⁾	29 August 2014	Compliant
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Wireline logs (Regulation 39)

Hardwicke-1	17 June 2014	23 June 2014	Non-Compliant
Pennington-2	3 July 2014	11 August 2014	Non-Compliant
Pennington North-1	17 July 2014	25 August 2014	Non-Compliant
Stunsail-2	10 November 2014	22 October 2014	Compliant
Balgowan-1	8 October 2014	22 October 2014	Non-Compliant
Burners-1	26 October 2014	7 November 2014	Non-Compliant

Cased Hole Logs (SBT-GR-CCL)

Bauer-12	8 June 2014	10 June 2014 ⁽¹⁾	Compliant
Bauer-13	7 June 2014	10 June 2014 ⁽¹⁾	Compliant
Stunsail-1	25 August 2014	25 August 2014	Compliant
Pennington-2	21 August 2014	21 August 2014	Compliant
Pennington North-1	22 August 2014	21 August 2014	Compliant
Balgowan-1	21 November 2014	4 November 2014	Compliant

Well Completion Reports (Regulation 40)

Stunsail-1	30 September 2014	26 September 2014	Compliant
Hardwicke-1	22 October 2014	22 October 2014	Compliant
Pennington-2	8 November 2014	7 November 2014	Compliant
Pennington North-1	22 November 2014	14 November 2014	Compliant
Bales-1	2 August 2014	30 July 2014	Compliant
Bauer-12	15 August 2014	13 August 2014	Compliant
Bales-1	2 August 2014	30 July 2014	Compliant
Bauer-13	2 September 2014	2 September 2014	Compliant

Well Samples (Regulation 48) ⁽²⁾

Bales-1	2 August 2014	22 October 2014	Compliant
Bauer-12	15 August 2014	30 October 2014	Compliant
Bauer-13	2 September 2014	30 October 2014	Compliant

Quarterly Cased Hole Well Activity Report (Regulation 41)

2nd Quarter 2014	31 July 2014	31 July 2014	Compliant
3rd Quarter 2014	31 October 2014	31 October 2014	Compliant

Down Hole Diagrams (Regulation 44)

Bauer-12	10 July 2014	1 July 2014	Compliant
Bauer-13	7 July 2014	16 June 2014	Compliant
Pennington-2	19 December 2014	18 November 2014	Compliant
Balgowan-1	16 December 2014	18 November 2014	Compliant
Congony-1	22 December 2014	5 December 2014	Compliant

Production Reports (Regulation 45)

April 2014	30 June 2014	30 May 2014	Compliant
May 2014	31 July 2014	31 June 2014	Compliant
June 2014	31 August 2014	31 July 2014	Compliant
July 2014	30 September 2014	30 August 2014	Compliant
August 2014	31 October 2014	31 September 2014	Compliant
September 2014	30 November 2014	30 October 2014	Compliant

⁽¹⁾ Extension of time for submission

⁽²⁾ 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 compliant 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 serious incidents during the reporting period. A serious incident is defined in section 85(1) of the Act.

During the reporting period, there was one reportable incident in PEL 91 and this was formally reported to the Department of State Development through quarterly compliance reporting. A reportable incident is defined in section 85(1) and Regulation 32 of the Act.

Table 6 - List of Reportable Incidents in PEL 91 during Licence Year 7

Location	Incident	Root Cause	Rectification
Solidus 3D Seismic Survey	Spill of hydraulic fluid	Monitoring and Maintenance	Clean-up of contaminated soil. Investigate alternate hose for vibrator truck.

4.6 Threat Prevention

Pursuant to Regulation 33(3) (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 91, other than the disruptive influence of occasional flooding of the Cooper Creek or abnormally high rainfalls in the basin itself.

Flooding events in the headwaters of the Cooper Creek are closely monitored by satellite surveillance to predict well in advance the time of their arrival in the PEL 91 area. Drilling schedules will continue to be amended accordingly.

5 Statement of Expenditure

Pursuant to Regulation 33(4) under the Act, 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”

The Expenditure Statement for Licence Year 7 of the first renewal term is presented as Appendix 4.

**Compliance with the SEO for Geophysical Operations
PEL 91 Licence Year 7 of First Renewal Term**

Beach's strategies for achieving each of the SEO objectives during geophysical operations well are outlined in Table below.

Note: The Santos SEO for Geophysical Operations has been adopted by Beach Energy Limited for its Seismic Operations in the South Australian sector of the Cooper Basin. References to 'Appendix 3' refer to a table included in Santos' "South Australia Cooper Basin and Arid Regions Statement of Environmental Objectives Geophysical Operations June 2006"

Table A1-1 SEO for Geophysical Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
1. Minimise the visual impact of operations.	<u>Campsite & survey line preparation</u> Proposed survey lines and campsites have been appropriately located and prepared to minimise the visual impact. The attainment of 0, +1 or +2 GAS criteria for 'visual impact' objective listed in Appendix 3.	Compliant	Camp sites were located adjacent to drill lease access tracks away from public roads. The visual impact of survey lines was minimised by weaving lines.

Table A1-1 SEO for Geophysical Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
2. Minimise disturbance to and contamination of soil resources.	<u>Campsite & survey line preparation</u> Attainment of 0, +1 or +2 GAS criteria for 'Minimise impacts to land surface' objective, as listed in Appendix 3. Proposed survey lines and campsites have been appropriately located and prepared to minimise the disturbance to soil resources.	Compliant	Impacts of survey lines on soil were minimised by avoiding the use of blades on swales and minimising dune cuttings.
	<u>Fuel & Chemical Storage & Management</u> No refuelling occurs outside designated refuelling/servicing areas. Spills or leaks are immediately reported and clean up actions initiated. Records of spill events and corrective actions are maintained in accordance with company procedures. Appropriate spill response equipment is available on site.	Compliant	Bunded refuelling areas were established at each survey camp. Fire extinguishers and spill kits were provided at these sites. There was one incident report relating to a small spill during the Solidus 3D survey.

Table A1-1 SEO for Geophysical Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
3. Minimise disturbance to native vegetation and fauna.	<u>Campsite & survey line preparation</u> The attainment of either 0, +1 or +2 GAS criteria for 'Impact on native vegetation' objective listed in Appendix 3. No mature trees are removed. Vehicle access to survey lines is to be via existing access tracks or pre-existing survey lines, except where they have rehabilitated. Other temporary access tracks may be utilised where such use is likely to result in less environmental impact than other options.	Compliant	The impact to native vegetation was minimised by weaving seismic lines and avoiding tall shrubs or trees. Pre-existing tracks in the survey region have been used for primary access to the survey area. Access to the survey area is via new or pre-existing seismic lines.
	<u>Fuel & Chemical Storage & Management</u> Refer to assessment criteria for objective 2. <u>Fire Danger Season restrictions & education</u> All personnel are fully informed on the fire danger season and associated restrictions.	Compliant	No fires associated with the Solidus 3 D survey.
4. Avoid disturbance to sites of cultural and heritage significance.	Appropriately trained and experienced cultural/heritage advisors have scouted proposed survey line locations and access tracks. The operator has a mechanism in place to appropriately report and respond to any sites discovered during survey operations. Any sites identified have been flagged and subsequently avoided.	Compliant	A pre-survey cultural assessment and work area clearance (WAC) was undertaken prior to the Solidus 3D survey. There have been no incident reports involving cultural heritage on the Solidus 3D survey.

Table A1-1 SEO for Geophysical Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
5. Minimise disturbance to livestock, pastoral infrastructure and landholders.	<p>The attainment of 0, +1 or +2 GAS criteria for 'Impact on infrastructure' objective listed in Appendix 3.</p> <p>No reasonable concerns raised by stakeholders are left unresolved.</p> <p>The extent to which the relevant sections of the Petroleum Act and Regulations have been followed and implemented and in particular in relation to landowner liaison and notification.</p>	Compliant	<p>Notice of Entry completed prior to the commencement of the survey.</p> <p>There were no incidents in relation to landholders associated with the Solidus 3D survey.</p>
6. Avoid the introduction or spread of exotic species and implement control measures as necessary.	Weeds or feral animals are not introduced into, or spread, in operational areas	Compliant	There is no evidence of the introduction of weeds to the Solidus 3D survey area by survey crews.

Table A1-1 SEO for Geophysical Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
7. Minimise disturbance to drainage patterns and avoid contamination of surface waters and shallow groundwater resources.	<u>Campsite & survey line preparation</u> Campsites and survey lines/traverses are located and constructed to avoid diversion of water flows. The attainment of 0, +1 or +2 GAS criteria for 'disturbance to land surface' objective listed in Appendix 3. No uncontrolled flows to surface from aquifers intersected in upholes/shallow boreholes. There is no unnecessary interference with natural drainage features.	Compliant	Steps were taken to minimise the impact of seismic lines on soils and surface water flows during the Solidus 3 D survey (e.g. avoiding watercourses, weaving, minimal use of blading).
	<u>Fuel Storage & Handling</u> No spills occur outside of areas designed to contain them. Refuelling occurs at least 1km from watercourses or sensitive ecological environments (wetlands). Appropriate spill response equipment is available on site. Spills or leaks are immediately reported and clean up actions initiated promptly.	Compliant	Bunded refuelling areas were established at each survey camp. There was one incident report relating to a small spill during the Solidus 3D survey.

Table A1-1 SEO for Geophysical Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
8. Optimise waste reduction and recovery	<p>Wastes are segregated and transported to an Environment Protection Authority (EPA) approved waste disposal facility for recycling or burial in accordance with approved procedures.</p> <p>0, +1 or +2 GAS criteria are attained for 'Negligible survey markers and rubbish in situ' objective listed in Appendix 3.</p>	Compliant	No rubbish was observed around the camps or on the seismic lines inspected during an audit of the Solidus 3D survey area.

Compliance with the SEO for Drilling and Well Operations PEL 91 Licence Year 7 of First Renewal Term

Beach's strategies for achieving each of the SEO objectives during drilling and well operations well are outlined in Table below.

Note: The Santos SEO for Drilling and Well Operations has been adopted by Beach Energy Limited for its Drilling and Well Operations in the South Australian sector of the Cooper Basin. References to 'Appendix 1 Table A2' and 'Appendix 1 Table A3' refer to tables included in Santos' "South Australia Cooper Basin Statement of Environmental Objectives: Drilling and Well Operations November 2009"

Table A1-2 SEO for Drilling and Well Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
1. Minimise risks to the safety of the public and other third parties.	Reasonable measures implemented to ensure no injuries to the public or third parties.	Compliant	<p>Communication of all potential hazards to safety associated with drilling and other well site operations including the rig move to all affected parties, prior to the commencement of such activities. Beach maintains regular contact with landholders and associated stakeholders during drilling operations.</p> <p>The design and operation of the PEL 91 activities is undertaken in accordance with Beach safety policies, standards and guidelines. All employees visiting or working drilling rigs undertake a safety induction prior to commencing work in the field and undertake a refresher course if/when required.</p> <p>Beach's Permit to Work System was in operation during drilling operations to control potentially dangerous situations.</p> <p>Appropriate Personal Protective Equipment (PPE) was issued to all personnel involved in the drilling operations.</p> <p>Accident / incident reporting systems are in place.</p> <p>The Beach HSE System, including Safety Management Plans, are updated and reviewed on a regular basis.</p> <p>Signage was erected along access roads to advise that only authorised personnel are permitted on to the well site.</p>
2. Minimise disturbance and avoid contamination to soil.	<p><u>Well Site and Access Track Construction</u></p> <p>0, +1 or +2 GAS criteria are attained for "Minimise impacts on soil" objective as listed in Appendix 1 Table A1 and "To minimise the visual impact" as listed in Appendix 1 Table A2.</p> <p>No unauthorised off-road driving or creation of shortcuts.</p> <p>No construction activities are carried out on</p>	Compliant	<p><u>Well Site and Access Track Construction</u></p> <p>The well sites and access tracks were constructed in accordance with Beach procedures and conditions identified in site specific assessments. Potential impacts on the environment considered prior to constructing tracks and well sites. Existing tracks utilised where feasible.</p> <p>Environmental Factors Reports prepared for each well site</p> <p>Vehicle and equipment movements limited to approved well lease area and designated access.</p>

Table A1-2 SEO for Drilling and Well Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
	<p>salt lakes or steep tableland slopes (as defined in EIR).</p> <p><u>Borrow pit construction and restoration</u></p> <p>0, +1 or +2 GAS criteria are attained for “Minimise visual impacts’, and “Minimise impact on soil” objectives as listed in Appendix 1 Table A3.</p> <p><u>Production Testing/Well Blowdowns</u></p> <p>No soil contamination as a result of production testing or well blowdown operations.</p> <p><u>Fuel and Chemical Storage and Handling</u></p> <p>No spills/leaks outside of areas designed to contain them.</p> <p>Level of hydrocarbon continually decreasing for in situ remediation of spills.</p> <p>Soils remediated to a level as determined by the SHI process.</p> <p>Also refer to Objective 12.</p> <p><u>Waste Disposal (domestic, sewage & sludges)</u></p> <p>All domestic wastes are disposed of in accordance with EPA licensing requirements.</p> <p>0, +1 or +2 GAS criteria are attained for “Site to be left in a clean and tidy condition” objective listed in Appendix 1 Table A2.</p> <p>No spills or leaks from sewage treatment processing.</p>	<p>Compliant</p> <p>Compliant</p> <p>Compliant</p> <p>Compliant</p>	<p>No leases or access tracks were constructed on salt lakes, tablelands or wetlands.</p> <p><u>Borrow pit construction and restoration</u></p> <p>Borrow pits will be rehabilitated and restored in accordance with the guidelines set down in DMITRE’s Field Guide for the Environmental Assessment of Abandoned Petroleum Wellsites in the Cooper Basin, South Australia.</p> <p><u>Production Testing/Well Blowdowns</u></p> <p>There were no spills as a result of production testing or well blowdown operations.</p> <p><u>Fuel and Chemical Storage and Handling</u></p> <p>Fuels and chemicals stored in bunded areas.</p> <p>Spills reported via Incident Reporting system and subsequently cleaned-up.</p> <p><u>Waste Disposal (domestic, sewage & sludges)</u></p> <p>Wastes were collected, stored and transported in covered bins or containers. All rubbish was disposed of at a licensed waste facility.</p>

Table A1-2 SEO for Drilling and Well Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
	Refer to Assessment Criteria for Objective 11.		
3. Avoid the introduction or spread of pest plants and animals and implement control measures as necessary.	No weeds or feral animals are introduced to or spread in, operational areas as a consequence of activities.	Compliant	Rigs and associated equipment washed down prior to entering different regions as per Beach procedures.

Table A1-2 SEO for Drilling and Well Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
4. Minimise disturbance to drainage patterns and avoid contamination of surface waters and shallow ground water resources.	<u>Well Lease and Access Track Construction</u> Well leases and access tracks are located and constructed to maintain pre-existing water flows (i.e. channel contours are maintained on floodplains and at creek crossings).	Compliant	<u>Well Lease and Access Track Construction</u> Environmental Factors Reports prepared for each well site to identify and minimise disturbance to surface drainage and waters.
	<u>Drilling Mud Sumps and Flare Pits</u> No overflow of drill cuttings, muds and other drilling fluids from mud sumps. No waste material disposal to sumps and flare pits.	Compliant	Drill leases and access tracks are constructed and located to avoid the possibility of flood waters being diverted from their natural direction of drainage in the event of local inundation.
	<u>Well Heads (Oil and Gas Systems)</u> No leaks/spills outside of areas designed to contain them.	Compliant	<u>Drilling Mud Sumps and Flare Pits</u> All drill cuttings, muds, and non toxic drill fluids are contained within designated mud sumps with adequate freeboard at the completion of operations to allow for a 1m cover of clean fill at remediation.
	<u>Well Blowdown/Production Testing</u> No water (surface or groundwater) contamination as a result of production testing or well blowdown operations.	Compliant	
	<u>Fuel/Chemical Storage and Handling</u> No water (surface or groundwater) contamination as a result of chemical storage and handling.	Compliant	<u>Fuel/Chemical Storage and Handling</u> Reported spills associated with drilling operations have not affected surface waters and shallow ground water resources.
	<u>Waste Management</u> Refer to Objective 11.	-	

Table A1-2 SEO for Drilling and Well Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
5. Avoid disturbance to sites of cultural and heritage significance.	Proposed well sites and access tracks have been surveyed and any sites of Aboriginal and non-Aboriginal heritage identified. Any identified cultural and heritage sites have been avoided.	Compliant	Beach has an agreement with the Dieri Native Title Claimant group which specifies the requirements for scouting proposed well sites and access tracks to identify and avoid areas of heritage value and archaeological significance. Joint site visits were carried out with Dieri Native Title Claimant group. The proposed drilling location and access route were agreed and given heritage clearance for activities within PEL 91 Areas of significance were recorded and marked as exclusion zones.
6. Minimise loss of aquifer pressures and avoid aquifer contamination.	<u>Drilling & Completion Activities</u> There is no uncontrolled flow to surface (Blow out). Sufficient barriers exist in casing annulus to prevent crossflow between separate aquifers or hydrocarbon reservoirs. Relevant government approval obtained for abandonment of any radioactive tool left downhole.	Compliant	The Drilling Programs for wells are designed to ensure minimal loss of reservoir and aquifer pressures and minimal contamination of freshwater aquifers. Wells have been either been cased from total depth to surface or plugged and abandoned. Competent cement bonds between aquifers encountered by the well bores and the Namur Sandstone hydrocarbon reservoir were established. Monitoring programs will be implemented to assess future behind casing cross-flow.
	<u>Producing, Injection, Inactive & Abandoned Wells</u> No cross-flow behind casing between aquifers, and between aquifers and hydrocarbon reservoirs unless approved by DWLBC	Compliant	

Table A1-2 SEO for Drilling and Well Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
7. Minimise disturbance to native vegetation and native fauna.	<u>Well Lease & Access Track Construction & Restoration</u> Any sites with rare, vulnerable and endangered flora and fauna have been identified and avoided. 0, +1 or +2 GAS criteria are attained for “Minimise impacts on vegetation” objective, during well lease and access track site selection and construction and for “Re-establish natural vegetation on abandoned well sites and access track” objective.	Compliant	<u>Well Lease & Access Track Construction & Restoration</u> Drill leases are not located in or near an area of high biological or wilderness values and hence the drilling operations presented no long term impacts to any such areas. Environmental Factors Reports prepared for each well site to identify and minimise potential impacts to native vegetation and fauna. Minimal clearance of vegetation required for the construction of access tracks and well sites in accordance with Beach procedures. Plugged and abandoned well sites rehabilitated in accordance with Beach procedures, which are based on DMITRE’s Field Guide for the Environmental Assessment of Abandoned Petroleum Wellsites in the Cooper Basin, South Australia.
	<u>Borrow Pits Construction and Restoration</u> 0, +1 or +2 GAS criteria are attained for “Minimise impacts on vegetation” objective during borrow pit site selection and construction, and “Minimise Impact on Vegetation” objective for borrow pit restoration.	Compliant	<u>Borrow pit construction and restoration</u> Borrow pits will be rehabilitated and restored in accordance with the guidelines set down in DMITRE’s Field Guide for the Environmental Assessment of Abandoned Petroleum Wellsites in the Cooper Basin, South Australia.
	<u>Waste Management</u> Refer to assessment criteria for Objective 11.	-	
	<u>Fuel and Chemical Storage and Management</u> Refer to assessment criteria for Objectives 2 and 4.	-	
8. Minimise air pollution and greenhouse gas emissions.	Compliance with EPA requirements.	Compliant	Emissions are not considered to be material.

Table A1-2 SEO for Drilling and Well Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
9. Maintain and enhance partnerships with the Cooper Basin community.	No unresolved reasonable complaints from the community.	Compliant	Beach maintained regular contact with the landholder and associated stakeholders prior to, and while undertaking well drilling operations.
10. Avoid or minimise disturbance to stakeholders and/or associated infrastructure	No reasonable stakeholder complaints left unresolved.	Compliant	Landowners have been kept informed of activities No complaints received
11. Optimise (in order of most to least preferable) waste avoidance, reduction, reuse, recycling, treatment and disposal.	<p>All wastes to be disposed of at an EPA licensed facility in accordance with EPA Licence conditions, with the exception of drilling fluids, drill cuttings, other fluids disposed during well clean-up and wastewater (see below).</p> <p>Wastewater (sewage and grey water) disposed of in accordance with the Public and Environmental Health (Waste Control) Regulations 1995 or to the Department of Health's satisfaction.</p> <p>Attainment of GAS criteria for "Site to be left in clean, tidy and safe condition" objective during well site restoration (refer Appendix 1 Table A2).</p> <p>Attainment of GAS criteria for "Site left in clean and tidy condition" objective during</p>	Compliant	<p>Wastes removed from well sites.</p> <p>Bins are covered to prevent access by wildlife and prevent spread of rubbish by wind.</p> <p>Non-putrescible waste material (including hazardous material) is stored safely on site prior to removal to an EPA approved disposal facility.</p> <p>Wastes were collected, stored and transported in covered bins or containers.</p> <p>All rubbish was disposed of at a licensed waste facility.</p>

Table A1-2 SEO for Drilling and Well Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
	borrow pit restoration (refer Appendix 1 Table A3).		
12. Remediate and rehabilitate operational areas to agreed standards.	No unresolved reasonable stakeholder complaints.	Compliant	<u>Contaminated Site Remediation</u> There are no contaminated sites associated with drilling activities in PEL91.
	<u>Contaminated Site Remediation</u> Contaminated sites are remediated to a level as determined by the approved SHI process.	N/A	<u>Well Lease & Access Track Construction & Restoration</u> Plugged and abandoned well sites rehabilitated in accordance with Beach procedures, which are based on DMITRE's Field Guide for the Environmental Assessment of Abandoned Petroleum Wellsites in the Cooper Basin, South Australia.
	<u>Well Site and Access Track Restoration</u> The attainment of 0, +1 or +2 GAS criteria for the objectives (refer Appendix 1 Table A2): - "To minimise the visual impact" - "The revegetation of indigenous species"	Compliant	<u>Borrow pit construction and restoration</u> Borrow pits will be rehabilitated and restored in accordance with the guidelines set down in DMITRE's Field Guide for the Environmental Assessment of Abandoned Petroleum Wellsites in the Cooper Basin, South Australia.
	<u>Borrow Pit Restoration</u> The attainment of 0, +1 or +2 GAS criteria for (refer Appendix 1 Table A3): - "Revegetation of indigenous species" - "Minimise impact on soil" - "Minimise visual impacts" - "Site to be left in a clean and tidy condition" Note: Well abandonment issues are addressed under Objective 6.	Compliant	

Compliance with the SEO for Cooper Basin Petroleum Production Operations (Nov 2009)
PEL 91 Licence Year 7 of First Renewal Term

Beach's strategies for achieving each of the SEO objectives during petroleum production operations are outlined in Table below.

Table A1-3 SEO for Cooper Basin Petroleum Production Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
1. To avoid unnecessary disturbance to 3 rd party infrastructure, landholders or land use	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	Compliant	Rehabilitation of production sites, roads and associated disturbances will be undertaken in consultation with the landholder when activities cease.
	No unresolved reasonable landholder / 3 rd party complaints Landholder activities not restricted or disturbed as a result of activities unless by prior arrangement.	Compliant	PEL 91 fields are located within Clifton Hills Pastoral Lease. Regular liaison with landholders provides advance warning of any significant developments or activities.
2. To maintain soil stability / integrity	The extent of soil erosion is consistent or less than surrounding land.	Compliant	Disturbance has been minimised where practical. Production activities are restricted to approved facilities and designated operational areas. No significant erosion has been reported either at the facilities or along the access roads. Inspections undertaken following significant rainfall and remedial action undertaken where required.

Table A1-3 SEO for Cooper Basin Petroleum Production Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
	Vegetation cover is consistent with surrounding land No evidence of significant subsoil on surface (colour).	Compliant	Topsoil stockpiled at new facility sites and associated borrow pits.
	No production activities undertaken on salt lakes, steep tableland land systems or wetlands land systems (as defined in the EIR) Abandoned areas (e.g. borrow pits) are remediated and rehabilitated to be reasonably consistent with the surrounding area 0, +1 or +2 GAS criteria for borrow pit construction and rehabilitation are attained (Appendix B)	Compliant	None of the PEL 91 fields are located on or within salt lakes, steep tableland areas or wetlands. Rehabilitation of the production sites and access tracks will be undertaken in consultation with the landowner when production ceases. Borrow pits will be remediated and rehabilitated to be reasonably consistent with the surrounding topography.
3. To minimise disturbance to native vegetation	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	Disused sites will be rehabilitated according to industry standards and Beach procedures. Existing borrow pits will be used in preference to new borrow pits where feasible and rehabilitation will be in accordance with GAS criteria.

Table A1-3 SEO for Cooper Basin Petroleum Production Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
	Vegetation clearing is limited to previously disturbed areas or areas assessed to be of lowest sensitivity. No rare, vulnerable or endangered flora removed without appropriate permits No production activities undertaken on salt lakes, steep tableland land systems or wetlands land systems (as defined in the EIR)	Compliant	Environmental Factors Reports prepared for each well site to identify and minimise disturbance to vegetation. No production activities have been undertaken on salt lakes, steep tableland land systems or wetlands land systems.
	Significant environmental benefit for native vegetation clearance approved by PIRSA (where delegated authority applies) or Native Vegetation Council. Significant environmental benefit obligation satisfied / implemented.	Compliant	On application and grant of PLs, earthworks pertaining to production activity will be incorporated into Beach Energy's ongoing commitments for SEB.
	Native fauna casualties are restricted to as low as reasonably practical.	Compliant	Covers installed on pits and excavations to minimise fauna access. Regular inspections of facilities include checking for trapped fauna.
	Works in aquatic habitats (e.g. flowing watercourses) has been approved by PIRSA	Not Applicable	No works have been undertaken in aquatic habitats during the reporting period.
4. To prevent the introduction or spread of weeds, pathogens and pest fauna	The presence of weeds and pathogens is consistent with or better than adjacent land No new outbreak or spread of weeds reported	Compliant	No new outbreak or spread of weeds reported.

Table A1-3 SEO for Cooper Basin Petroleum Production Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
5. To minimise the impact of the production operations on water resources	For excavations, surface drainage profiles area restored to be as reasonably consistent with surrounding area as possible. For existing easements, drainage is maintained similar to pre-existing conditions.	Compliant	Surface drainage maintained via culverts on access roads.
	Volume of water produced is recorded. No uncontrolled flow to the surface (i.e. no free flowing bores) Note: the "Cooper Basin Drilling and well Operations" SEO provides detail on aquifer issues.	Compliant	No free-flowing bores associated with Beach production activities.
6. To avoid land or water contamination	No evidence of any spills or leaks to areas not designated to contain spills In the event of a spill, the spill was: <ul style="list-style-type: none"> • Contained • Reported • Cleaned-up • Cause investigated and corrective and/or preventative action implemented Compliance with the Environment Protection Act, Australian Standard 1940 and the Australian Dangerous Goods Code.	Compliant	No spills or contamination occurred during production testing at PEL 91 fields

Table A1-3 SEO for Cooper Basin Petroleum Production Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
	Contamination restricted to known areas and remediation strategies investigated and implemented where practical. Level of hydrocarbon contamination continually decreasing, ultimately to meet Environment Protection Authority (EPA) guidelines	Not Applicable	There is no in-situ treatment of hydrocarbon spills occurring in PEL91.
	No evidence of rubbish or litter on easements or at facilities. No evidence that waste material is not contained and disposed of in accordance with Beach approved procedures. Evidence of waste tracking certificates for prescribed wastes. Evidence of compliance with any waste disposal licence conditions (e.g. EPA permits)	Compliant	Well sites and facilities kept clean and tidy. All waste materials collected and disposed of via appropriately licenced recycling and waste disposal facilities.
	No evidence of impacts to soil, water and vegetation as a result of water disposal (i.e. soil erosion, dead vegetation, water discoloration)	Compliant	All water continues to be disposed of in accordance with Beach approved procedures.
	Waste water disposed of in a manner that minimises risk to the environment and public health Compliance with the Environment Protection Act	Compliant	All waste material has been and continues to be disposed of in accordance with Beach licences and procedures.

Table A1-3 SEO for Cooper Basin Petroleum Production Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
	Water monitoring results indicated levels of Total Petroleum Hydrocarbons (TPH) below 30mg/L in bunded holding ponds and 10mg/L in bunded and / or freeform evaporation ponds No evidence of overflow of product from interceptor pit. No evidence of hydrocarbon contamination immediately adjacent to bunded ponds	Compliant	
	Periodic reports as required detail quantity, level of contamination and proposed ongoing operation of the Land Treatment Unit.	Not Applicable	No land treatment units in operation
7. To minimise the risk to public health and safety	No injuries or incidents involving the public Demonstrated compliance with relevant standards Emergency procedures implemented and personnel trained	Compliant	No incidents of risk to public health and safety during the reporting period.
	No uncontrolled operations related fires	Compliant	No fires occurred at PEL 91 fields as a result of production activities.
	No unauthorised activity	Compliant	
8. To minimise impact of emergency situations	Emergency response procedures are effectively implemented in the event of an emergency Emergency response exercises are aligned with credible threats and consequences identified in the risk assessment Refer to previous criteria (Objective 1, 2, 3 & 6)	Compliant	No emergency situations arose in PEL 91 fields during the reporting period. Beach's HSE system includes periodic simulation of Emergency situations at production facilities.

Table A1-3 SEO for Cooper Basin Petroleum Production Operations			
Objective	SEO Criteria	Compliance	Findings/Comments
9. To minimise noise due to operations	Operational activities have taken reasonable practical measures to comply with noise regulations, under the Environment Protection Act 1993. No unresolved reasonable complaints.	Compliant	All PEL 91 fields are located in remote areas away from dwellings. No noise issues or complaints from production activities.
10. To minimise atmospheric emissions	Reasonable practical measures implemented in design and operation to minimise emissions Annual Report includes atmospheric emissions data No reasonable complaints received No dust related injuries recorded	Compliant	PEL 91 fields are oil producers. Production testing in PEL 91 has minimal impact on emissions. Atmospheric emissions are being reported on a financial year basis as part of Beach's obligations under the <i>National Greenhouse and Energy Reporting Act</i> (NGER). No complaints/injuries reported.
11. To adequately protect cultural heritage sites and values during operations and maintenance	Proposed construction areas and access tracks surveyed by relevant cultural heritage group. Any new sites identified are recorded and reported to appropriate authority. No impact to identified sites without approval. 0, +1 or +2 GAS criteria for borrow pit construction and rehabilitation are attained (Appendix B).	Compliant	Beach has an agreement with Dieri Native Title Claimant group which specifies the requirements for scouting proposed well and facility sites and access tracks to identify and avoid areas of heritage value and archaeological significance. Site visits were carried out with the Dieri Native Title Claimant group. Locations of proposed facilities and access route were agreed and given heritage clearance for activities within PEL 91. Areas of significance were recorded and marked as exclusion zones.