



EMPIRE ENERGY GROUP LIMITED

Australian Office  
A.B.N 29 002 148 361  
Level 5, 6 – 10 O'Connell Street  
Sydney NSW 2000 Australia

**12 July 2024**

Committee Secretary  
Senate Standing Committees on Environment and Communications  
PO Box 6100 Parliament House  
Canberra ACT 2600

Email: [ec.sen@aph.gov.au](mailto:ec.sen@aph.gov.au)

Dear Secretary,

### **Inquiry into Middle Arm Sustainable Development Precinct**

In our appearance during public hearings of the Senate Environment and Communications Committee on 17 June 2024, Empire Energy Group was asked to detail 16 “breaches” which had occurred in our operations on Exploration Permit 187.

The Chair was going to detail the breaches to which she referred, but no such clarification has been received.

As we stated in the hearings, all the recorded incidents in relation to our operations were reported to the Northern Territory Government by Empire Energy’s subsidiary Imperial Oil and Gas. None have resulted in any material environmental impact, and reflecting the transparency of the Territory’s regulatory regime, the incidents are published here:

[Annual environment performance report | Department of Environment, Parks and Water Security](#)

Highlighting the robustness of the NT regulatory regime, the substantial majority of the reported incidents would not be reportable in any other Australian jurisdiction or any international jurisdiction of which we are aware.

Given claims made by some Senators during the hearings, it is appropriate to note that:

- Empire has demonstrated our commitment to sustainable operations, transparency and accountability in the 12 years we have been active in the Beetaloo Basin.
- We are committed to genuine engagement and concern for cultural values.
- We take our commitments very seriously.
- We place a high priority on our compliance, and we work under the very thorough NT regulatory regime – without doubt the most robust in Australia.
- All incidents referred to were reported by Empire Energy as part of our regular reporting to the NT Government – demonstrating the system’s transparency.
- It is appropriate to repeat that that none of these issues resulted in any material environmental harm.

- Specifically, given the false and exaggerated claims being made Empire wants to make clear that:
  - No Aboriginal artefacts were moved by anyone other than Traditional Owners under their own initiative. The artefacts referred to were not on Empire's operational areas.
  - No fluids were spilled from tanks or sumps, and all contingency provisions served their purpose – ullage for rain, leak detection for liners. All worked to ensure no harm to the environment.
  - Gouldian Finch habitat has been protected at all times, and no finches have been disturbed or harmed.
- The fact that Empire has reported all these incidents, that all incidents have been publicly reported, and that any necessary remedial action has been or is being undertaken shows that the safeguards the NT Government has put in place to protect the environment and allow sustainable development of its gas resources are working.
- Empire is committed to ensuring that continues to be the case.

Empire is committed to engaging all stakeholders with respect and transparency and responding to all genuine questions and concerns.

As we have done in the 12 years we have conducted activities in the Northern Territory, we will continue to be accountable to the Traditional Owners on whose land we operate.

If you require further information, please contact me on \_\_\_\_\_ or at \_\_\_\_\_

Yours sincerely,

**Alex Underwood**  
Managing Director