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Mr. James Pratt
Senior Executive Director, Energy Development
Department of Mining and Energy
GPO Box 4550
DARWIN NT 0801

INPEX Submission | Pipelines and Petroleum Legislation Amendment (Industry Development) Bill 2026 (NT)

Dear Mr. Pratt,

Thank you for the opportunity to participate in the Northern Territory Government's consultation process for the proposed *Petroleum Legislation Amendment (Industry Development) Bill 2026 (NT)*.

INPEX broadly supports the proposed amendments which appear to be relatively straightforward and considered but we have identified several areas that require additional clarification or review.

We welcome the efforts of the Department to progress amendments to, amongst other things, formally enable the transmission of carbon dioxide through a licenced pipeline which is a key component of the INPEX-operated Bonaparte Carbon Capture and Storage project.

INPEX remains firmly committed to contributing to the economic prosperity of the Northern Territory. We encourage the finalisation of the legislation to enhance legislative certainty, streamline government approvals, and establish greater policy certainty for major projects in the region.

Please refer to Appendix 1 for INPEX's comments on the proposed amendments.

If we can assist further, please contact John Williams, Government Affairs and Regulatory Approvals Manager, at +61 412 422 636 or john.w@inpex.com.au.

Yours sincerely,

Bill Townsend
Senior Vice President Corporate
INPEX Australia

Appendix 1: Pipelines and Petroleum Legislation Amendment (Industry Development) Bill 2026 (NT) – Consultation

INPEX Submission

INPEX broadly supports the proposed amendments to the *Energy Pipelines Act 1981 (NT)* (**the EP Act**) and the *Petroleum (Submerged Lands) Act 1981 (NT)* (**the PSLA**) but has identified several items for further clarification or review. We make the following comments:

Definition of apparatus and works

INPEX considers that the proposed amendments to the definition of “apparatus and works” in the EP Act are overly specific and may not encapsulate the full range of components that may make up a pipeline over time, including technological advancements. To provide sufficient flexibility for industry and avoid the need for regular future amendments, INPEX recommends a simplified approach be taken for this definition, as follows:

apparatus and works, in relation to a pipeline, means

- (a) apparatus downstream of the primary valve;
- (b) equipment and vehicles for the operation of any apparatus; and
- (c) other facilities used in connection with the pipeline including loading terminals and stations, works, buildings, fittings, pumps, tanks, appurtenances, and appliances.

Exclusion of certain types of pipelines

INPEX requests a review of the proposed amendments to ensure that the specified minimum yield stress (SMYS) is used consistently, in alignment with Design Standard AS4645.1. This results in higher values of strength. References to “maximum yield stress” should be removed.

Definition of pipeline management plan

INPEX considers that the proposed wording of new section 18A could be slightly amended to reflect the current provisions relating to pipeline management plans under the *Energy Pipelines Regulations 2001 (NT)*, as follows:

18A Pipeline management plans

- (2) *The regulations may make provision for the preparation, submission and acceptance of pipeline management plans **as well as the revision of and withdrawal of acceptance of pipeline management plans.***

Transfer of petroleum between interest areas

INPEX sees the proposed update to the current operational approvals to allow the transfer of petroleum between Titles as a positive step. INPEX considers that this update will provide more efficient pathways for the full utilisation of existing petroleum infrastructure and shared future developments in onshore Northern Territory. INPEX suggests that a clear set of Guidelines be prepared and published to outline the process as well as define the potential regulatory barriers to the transfer.

Continuation of final exploration permit term

INPEX supports the proposed amendment to ensure continuation of the final term of an exploration permit term while an application for a derivative title is awaiting approval. Maintaining title tenure and operational rights during the application and approval process period will maintain momentum in development projects.

Retention licence renewals

Q26. Following from the transfer of petroleum between interest areas update, INPEX suggests that the Regulator should determine whether the barrier to early development is due to the lack of third-party access to existing production infrastructure or land access agreement delays in addition to understanding the petroleum resource.

Division and amalgamation of retention licence areas

INPEX supports increasing flexibility in the ongoing title management of retention licence areas in onshore Northern Territory. INPEX suggests that a reference is included in the Regulations or published Guidelines to confirm that although the Titleholders across both retention licences must be the same, the working interest held by each does not need to align. Therefore, the division and amalgamation process could realise different working interests than in the resultant title.

Q27 and Q28: INPEX suggests that a review of the technical work programme for both the impacted and new retention licences should be undertaken at the application stage. As long as the technical work programme strategy remains valid for the discovery resource and can be met, a reduction in the original agreed work programmes should be accepted.

Other Comments & Feedback

Infrastructure facilities

INPEX suggests the Department consider how licensing arrangements may apply to an infrastructure facility, structure, or installation that extends from an infrastructure licence in Commonwealth waters under the *Offshore Petroleum and Greenhouse Gas Storage Act 2006 (Cth)* into Northern Territory coastal waters or onshore, whether utilised for petroleum or greenhouse gas purposes.