

RESOURCE MANAGEMENT AND ADMINISTRATION REGULATIONS | *EXPOSURE DRAFT CONSULTATION*

Australian Energy Producers | 15 August 2025

Australian Energy Producers welcomes the opportunity to input into the remaking of the Offshore Petroleum and Greenhouse Gas Storage (Resource Management and Administration) Regulations 2011, recognising the need to modernize the framework to support Australia's energy transition while maintaining a stable investment environment. The Resource Management and Administration regulations play a critical role in ensuring good oilfield practice, optimal resource recovery, and the timely dissemination of technical data, all while balancing environmental, safety, and commercial imperatives.

Natural gas is essential to Australia's energy security and energy affordability and is a cornerstone of the economy. Natural gas meets over a quarter of Australia's primary energy needs,¹ producing dependable electricity, powering industry, and providing reliable and affordable energy to millions of homes and businesses. The Australian natural gas industry contributes over \$100 billion to the Australian economy each year² including \$22 billion in taxes and royalties in 2024-25 alone.³ The industry also supports over 215,000 Australian jobs along the gas supply chain.⁴

Offshore regulations must be fit-for-purpose and avoid unnecessary complexity, prescriptive requirements, and unduly increasing administrative burden on operators. The industry operates in a high-cost, high-risk environment, where regulatory certainty and efficiency are paramount to attracting investment. While Australian Energy Producers supports the overarching objectives of the draft regulations, such as enhancing data management, well integrity, and greenhouse gas (GHG) storage—there are several areas in the draft where the proposed changes introduce unnecessary complexity, prescriptive requirements, and administrative burdens. These could inadvertently deter investment, increase compliance costs, and hinder innovation without commensurate benefits to resource management or public interest.

Australian Energy Producers recommends incorporating greater flexibility, clearer guidance, and targeted enforcement to align with principles of good governance. Overall, there is a trend toward increased reporting scope, frequency, and detail, alongside broader application of civil penalties. While robust compliance is essential, these elements risk creating an overly punitive regime that could stifle industry activity.

General comments and recommendations are provided below, with further detailed feedback on the draft regulations is provided in **Annex 1**.

Australian Energy Producers is committed to ongoing collaboration or provide further details on our feedback. Please contact Jason Medd Director Offshore and Decommissioning, at jmedd@energyproducers.au for any questions.

¹ Department of Climate Change, Energy, the Environment and Waters, [Australian Energy Update 2024](#), 2024

² KPMG, [Economic Contribution of the Gas Industry](#), 2025

³ Australian Energy Producers, [Financial Survey 2025](#), 2025

⁴ KPMG, [Economic Contribution of the Gas Industry](#), 2025

GENERAL COMMENTS AND RECOMMENDATIONS

- **Part 2: Notification and Reporting of Discovery of Petroleum.** The 14-day response period for providing additional information on petroleum discoveries is unreasonably short and should be extended, particularly given the technical complexity involved. This timeframe does not allow sufficient opportunity for accurate data compilation and could lead to incomplete submissions.
- **Part 3: Title Assessment Reports (ATARs).** The proposed changes to the scope, frequency, and detail, of the annual title assessment report (ATAR) requirements raise significant concerns, potentially imposing prescriptive obligations that add costs without accelerating resource commercialisation. For instance, new mandates for prospect/lead volumetric estimates and chance of success prior to discovery (section 26) could require the premature release of sensitive commercial data. Similarly, updated cashflow tables and CAPEX estimates for retention leases (section 27) should be limited to ATARs where a commerciality review is explicitly required, rather than applied annually.

Australian Energy Producers notes that the Titles Administrator already has authority under the Act to request targeted information, backed by penalties for non-compliance. Mandating recurring detailed reporting—regardless of materiality—creates an unnecessary burden.

- **Part 4: Field Development Plans (FDPs) and Approvals of Petroleum Recovery.** The increased complexity in FDP processes will require increased operator resources while the justification for changes is unclear. Section 43 introduces ambiguity into the regulations by allowing parallel information requests from the Joint Authority and Titles Administrator, risking duplication and delays. The widespread imposition of civil penalties (e.g., section 59) appears disproportionate, potentially penalising good-faith efforts on subjective matters like information sufficiency.

Australian Energy Producers would recommend that section 43 is amended to channel all requests through the Titles Administrator for single-window efficiency. Additionally, civil penalties should be reserved for serious breaches, adopting graduated enforcement (e.g., warnings) for administrative issues and introduce a structured transition process for existing FDPs, including clearer acceptance criteria and timelines to minimise disruption.

- **Part 5: Well Integrity.** Prescriptive requirements in Part 5 conflict with As Low As Reasonably Practicable (ALARP) principles, particularly at the concept select stage. The new annual well integrity report (section 96) is a positive step but lacks flexibility in aligning reporting periods.
- **Part 7: Data Management—Petroleum Titleholders.** Clarification is needed on application timelines, reporting dates, and data formats. For example, daily geological reports (section 126) include interpretive elements like formation tops, which may warrant confidentiality. Raw navigation data requirements (sections 129–131) should specify formats (e.g., P2/94 vs. P1/90) to avoid confusion. The new authority for the Titles Administrator to request additional samples (section 137) or determine formats (section 139) requires further consultation.

Australian Energy Producers recommend that data formats are published on the NOPTA website for a fixed period prior to change, incorporating more detailed industry consultation.

- **Part 8: Release of Technical Information about Petroleum.** Misalignments in confidentiality periods for data types (e.g., section 152) could see the premature release of non-exclusive reprocessing data.

- **Part 9: Data Management—Greenhouse Gas Titleholders.** Australian Energy Producers is concerned with the increased scope and complexity in this section, with added proprietary risks (e.g., seismic reprocessing as intellectual property in section 178). Similar issues arise with navigation data (sections 174–176) and sample requests (section 185).
- **Part 10: Release of Technical Information about Greenhouse Gas.** Australian Energy Producers welcomes section 204 which reduces overlap with the Environment Protection (Sea Dumping) Act 1981. However, release periods (section 201) need to be aligned for non-exclusive data.
- **Parts 16 and Schedule 1: Transitional Provisions and Fees.** Transitional arrangements for FDPs are insufficient and should include broader provisions for ongoing activities. Australian Energy Producers recommends expanding transitional arrangements to include practical timelines for compliance and the grandfathering of existing approvals where possible.

Australian Energy Producers appreciates the Department's efforts to update these regulations and values the consultative process. While the draft regulations advance important objectives, addressing the concerns outlined—particularly around flexibility, proportionality in penalties, and transitional support—will enhance their effectiveness and support Australia's energy goals. We urge the adoption of our recommendations to create a regulatory environment that encourages investment, innovation, and responsible resource development.

Further detailed feedback on the draft regulations is provided in **Annex 1**.

ANNEX 1 | DETAILED FEEDBACK ON THE RESOURCE MANAGEMENT AND ADMINISTRATION REGULATIONS EXPOSURE DRAFT

Old number (2011 RMA Regulations)	New number (2025 RMA Regulations)	Summary of change	Industry Position / Comments
PART 1 – PRELIMINARY			
Part 1		General Comments	No comments.
PART 2 - NOTIFICATION AND REPORTING OF DISCOVERY OF PETROLEUM			
Part 2		General Comments	14-day response period unreasonable and too short; recommend extension to this time period.
PART 3 - TITLE ASSESSMENT REPORTS			
Part 3		General Comments	Changes raise major concerns about scope, frequency, and detail; need for greater flexibility, confidentiality provisions and guidance.
3.06	26		Concern that provision of prospect/lead volumetric estimates and chance of success should not be provided prior to discovery. Concern that future work programs may become more prescriptive adding costs to titleholders without a clear link to accelerating commerciality of resources under RL (e.g. exploration well commitments for prospects that are not considered commercially attractive by titleholders).
3.07	27		<p>New requirement for Retention Lease (RL) ATARs (for both petroleum and GHG leases) to provide update cashflow tables and CAPEX estimates for each development option in each ATAR. This should be limited to only the ATAR years where a commerciality review is included in the work program or as requested by regulator in accordance with the Act.</p> <p>AEP notes that NOPTA already has the authority to request any information it considers necessary under the Act, with appropriate penalty provisions to ensure compliance. This targeted, fit-for-purpose model ensures information is asked for only</p>

			when needed, rather than mandating detailed CAPEX and cashflow reporting from all titleholders on a recurring basis, regardless of relevance or materiality. Imposing these reporting obligations on every ATAR, particularly in circumstances where there is little change or relevance to the reporting period, creates compliance costs without commensurate benefit. We strongly recommend that this requirement be removed, and that any necessary information continue to be sought through existing mechanisms on an as-required basis, preserving regulatory efficiency and avoiding unnecessary administrative burden on industry.
PART 4 - FIELD DEVELOPMENT PLANS AND APPROVALS OF PETROLEUM RECOVERY			
Part 4		General Comments	<p>Concerned about increased complexity and subsequent demand on operator's resources. AEP questions the necessity for changes and increased complexity and requests a transition process and clearer acceptance criteria to be defined.</p> <p>We are concerned by the widespread application of civil penalties across numerous sections of the Exposure Draft. These appear to take an overly punitive and heavy-handed approach to compliance. While we support the need for a robust regulatory framework, the blanket imposition of civil penalties—even for administrative oversights or subjective matters such as the sufficiency of information provided—risks deterring investment and fostering an adversarial regulatory environment</p>
4.05	43	Joint Authority decisions on field development plans.	This provision introduces unnecessary regulatory burden and ambiguity by exposing titleholders to parallel requests from both the Joint Authority and the Titles Administrator—without clearly defined statutory timeframes, response protocols, or dispute resolution mechanisms. This risks duplicative reporting, protracted approval delays, and further uncertainty in capital investment decision-making. We urge that section 43 be amended to remove any avenue for the Joint Authority to seek additional information directly from titleholders. Instead, all requests for further information must be made exclusively via the Titles Administrator, preserving the single window reporting model and ensuring consistency, accountability, and administrative efficiency. The draft proposal fragments regulatory communication channels and should be removed in full to uphold principles of good governance and investment certainty.
4.17	59	Renamed. Amended to include civil penalty provision.	We are concerned by the widespread application of civil penalties across numerous sections of the Exposure Draft, which appears to take an overly punitive and heavy-handed approach to compliance. While we support the need for a robust regulatory framework, the blanket imposition of civil penalties—even for administrative

			oversights or subjective matters such as the sufficiency of information provided—risks deterring investment and fostering an adversarial regulatory environment. The current drafting lacks proportionality and fails to distinguish between deliberate non-compliance and good-faith efforts to meet complex and evolving requirements. We strongly urge a more calibrated approach that reserves civil penalties for serious or repeated breaches and encourages cooperation and continuous improvement through guidance, warnings, and graduated enforcement responses.
PART 5 - WELL INTEGRITY			
Part 5		General Comments	AEP is significantly concerned with the prescriptive requirements in Part 5, which conflict with ALARP principles at Concept Select stage of operations. Further AEP calls for further operational flexibility and risk-based decision-making to be included in the regulations here.
Not in 2011 RMA Regulations	96	New section setting out requirements for annual well integrity report.	It would be practical to have the option to re-align the annual period rather than starting on day of Well Operations Management Plan (WOMP) acceptance (as can be done with ATARs if required).
PART 6 - AUTHORISATION OF PETROLEUM TITLEHOLDERS TO CONDUCT GREENHOUSE GAS EXPLORATION			
Part 6		General Comments	No comments
PART 7 - DATA MANAGEMENT—PETROLEUM TITLEHOLDERS			
Part 7		General Comments	Request further clarification on application of regulations, reporting and submission dates.
7.13	126	Requirement for initial well completion report and data	<p>Requirements for Initial well completion report includes provision of both daily drilling and daily geological reports. Daily geological reports include formation tops which are considered interpretive.</p> <p>Greater clarity on rig release dates when we are batch drilling development wells would be good, for example defining the rig release date based on release of the manifold.</p> <p>The requirement to provide processed log data & ultra violet (UV) images of core or side wall core photography appear consistent with old regulations, however we do not always obtain UV images and processed logs are often interpretive.</p>

7.16	129	Requirement for survey acquisition report and data.	Reference to raw navigation deliverables suggest delivering unprocessed field data navigation (P2/94 or P2/11) while operators would generally deliver final processed field data navigation (P1/90 or P1/11) with the acquisition data. Old document did stipulate P2/94 or later. Please confirm it is P2/94 or P2/11 raw navigation that is required.
7.17	130	Requirement for survey processing report and data	It is proposed that final processed navigation (P1/90 or P1/11) is provided with processing deliverables, whereas this is generally delivered with acquisition data. Please clarify this requirement in combination with section 129 comment above.
7.18	131	Requirement for survey interpretation report and data	The date for submission of the Interpretation report/data needs clarifying as it is based on when the data is licenced rather than the year in which its listed in the work program.
Not in 2011 RMA Regulations	137	New section setting out that Titles Administrator may request other cores, cuttings or samples.	Some clarity is required on when this provision would be applied. What samples would the Title Administrator be looking to obtain and will they consult industry if they elect to start requesting new sample types? The submission requirements for any new type of sample will need to be clearly specified. Additional submissions would not be budgeted for.
Not in 2011 RMA Regulations	139	New section allowing the Titles Administrator to determine format or medium for data.	Data submission methods and formats should be published on the NOPTA website rather than being specified in the regulations. It would be good to have this locked for a period of time and that any changes are first consulted with industry. Further detail is also requested on what the new requirements will be?
PART 8 - RELEASE OF TECHNICAL INFORMATION ABOUT PETROLEUM			
Part 8		General Comments	AEP queries the apparent misalignment between the withholding periods of some data types and circumstances.
8.11	152	Confidentiality periods amended.	If the reprocessing undertaken as a condition of the petroleum title is non-exclusive, would the release date change from 3 years to 10 years?
PART 9 - DATA MANAGEMENT—GREENHOUSE GAS TITLEHOLDERS			
Part 9		General Comments	AEP notes increased scope and complexity in this section and recommends careful consideration to ensure improved manageability for operators.
9.13	171	Amended to include strict liability offence and civil penalty provision.	Requirements for Initial well completion report includes provision of both daily drilling and daily geological reports. Daily geological reports include formation tops which are considered interpretive.

			<p>Greater clarity on rig release dates when we are batch drilling development wells would be good, for example defining the rig release date based on release of the manifold.</p> <p>The requirement to provide processed log data & ultra violet (UV) images of core or side wall core photography appear consistent with old regulations, however we do not always obtain UV images and processed logs are often interpretive.</p>
9.16	174	Requirement for survey acquisition report and data	Reference to raw navigation deliverables suggest delivering unprocessed field data navigation (P2/94 or P2/11) while operators would generally deliver final processed field data navigation (P1/90 or P1/11) with the acquisition data. Old document did stipulate P2/94 or later. Please confirm it is P2/94 or P2/11 raw navigation that is required.
9.17	175	Requirement for survey processing report and data	It is proposed that final processed navigation (P1/90 or P1/11) is provided with processing deliverables, whereas this is generally delivered with acquisition data. Please clarify this requirement in combination with section 129 comment above.
9.18	176	Requirement for survey interpretation report and data	The date for submission of the Interpretation report/data needs clarifying as it is based on when the data is licenced rather than the year in which its listed in the work program.
Not in 2011 RMA Regulations	178	New section setting out requirement for survey reprocessing interpretation report and data.	Some clarity is required on when this provision would be applied. What samples would the Title Administrator be looking to obtain and will they consult industry if they elect to start requesting new sample types? The submission requirements for any new type of sample will need to be clearly specified. Additional submissions would not be budgeted for.
Not in 2011 RMA Regulations	185	New section setting out that Titles Administrator may request other cores, cutting or samples.	Data submission methods and formats should be published on the NOPTA website rather than being specified in the regulations. It would be good to have this locked for a period of time and that any changes are first consulted with industry. Further detail is also requested on what the new requirements will be?
Not in 2011 RMA Regulations	187	New section setting out that Titles Administrator may determine format or medium for data.	<p>Requirements for Initial well completion report includes provision of both daily drilling and daily geological reports. Daily geological reports include formation tops which are considered interpretive.</p> <p>Greater clarity on rig release dates when we are batch drilling development wells would be good, for example defining the rig release date based on release of the manifold.</p>

			The requirement to provide processed log data & ultra violet (UV) images of core or side wall core photography appear consistent with old regulations, however we do not always obtain UV images and processed logs are often interpretive.
PART 10 - RELEASE OF TECHNICAL INFORMATION ABOUT GREENHOUSE GAS			
Part 10		General Comments	AEP welcomes the introduction of od section 204 to reduce regulatory overlap; there is need for further clarity and consistency in this section.
10.11	201	Release of basic disclosable information.	If the reprocessing undertaken as a condition of the greenhouse gas title is non-exclusive then would the release date change from 3 years to 10 years?
Not in 2011 RMA Regulations	204	New section setting out requirements for the release of documentary information under the Sea Dumping Act.	Welcomes section 204 for reducing regulatory overlap; calls for clarity and consistency.
PART 16 - TRANSITIONAL, SAVING AND APPLICATION PROVISIONS			
Part 16		General Comments	AEP requests a more practical transition process for FDPs, including broader transitional provisions that have not been addressed.
PART 17 - APPLICATION FEES ETC.			
Part 17		General Comments	AEP requests a more practical transition process for FDPs, including broader transitional provisions that have not been addressed.