



Complete Application submitted to
Mineral Resources Tasmania
30 July 2010

FORMAL APPLICATION **FOR EL 14/2009**

Variation of exploration licence under the
Mineral Resources Development Act 1995

30 July 2010



Great South Land
Minerals Limited

Great South Land Minerals Limited ABN 54 068 650 386

30 July 2010

Minister for Energy and Resources
1st Floor Franklin Square Offices
Hobart, TAS 7000

Attn: The Honourable Bryan Green

RE: Great South Land Minerals Limited (GSLM) application to the Minister for a 'variation of exploration licence' to increase area under Section 31 (2a) of the Mineral Resources Development Act (MRD) Act 1995 relating to EL 14/2009.

Dear Minister,

The Boards of Empire Energy Corporation International (Empire) and Great South Land Minerals Ltd (GSLM) wish to congratulate you on your re-election and subsequent appointment as Tasmanian Minister for Energy and Resources. We also wish to thank you for awarding exploration licence EL 14/2009 allowing Empire and GSLM to continue exploration and development work. We look forward to working with you to bring the oil and gas industry into full production for the benefit of all Tasmanians.

Since 1977, GSLM and its predecessor companies have accumulated over 33 years of exploration research and experience in oil and gas in Tasmania, and solely developed gravity-, magnetic-, and seismic data bases that found that oil and gas does exist in the Tasmania Basin. In achieving this, the company has invested over \$56 million, which has been achieved without any significant assistance from industry or the Tasmanian Government.

To further this exploration work, Empire has signed a conditional contract with GEFCO Inc. of Enid, Oklahoma (<http://www.gefco.com/drillingrigs.htm>) to purchase a purpose built GEFCO SS-1100 drilling rig. It is truck mounted and specifically designed for Tasmania's terrain and weather conditions with a capability to drill both vertically and horizontally to 15,000 feet (4,572m).

Empire is currently completing its study on reservoir definition in preparation to drill our two highest priority targets at Bellevue and Thunderbolt this summer, which independent consultants have estimated could contain up to 447 million barrels of oil. Based on an average price per barrel of \$70 these two structures could yield a 12% royalty stream to the Tasmanian government of about \$3.7 Billion. This would equate to over \$185 million per year over 20 years.

The attached application sets out the issues and reasons by which Empire and GSLM seek your determination of a *variation of exploration licence* under Section 31 (2a) of the *Mineral Resources Development (MRD) Act 1995* which states '*...on the application of a licensee, the*

Minister, by notice in writing, may vary the licence by – adding to, or reducing, the area of land comprised in the licence’.

GSLM requests a variation (increase) of area of Exploration licence (EL) 14/2009 and queries the tenure of EL 14/2009 for only 2 years. GSLM also request that this ‘*variation of exploration licence*’ can be reviewed within 28 days from the submission of this application.

The basis for a review and renegotiation of the area and term of tenure are contained within this application.

This submission formally requests that you reconsider the conditions of the current exploration licence (EL 14/2009) and make an adjustment to the area granted to more accurately reflect GSLM’s previous work program and what the company believes are legitimate entitlements to the entire licence area.

The government has a responsibility to the Tasmanian people to ensure that Empire and GSLM now has every opportunity to complete its full five (5) year work program with the ultimate objective of commercialising the tenement into full production. The two year licence (issued in its current form) with an unspecified renewal period is an impediment to corporate financing and restricts the scope of our work program, the sole purpose of which is to realise the full economic potential of the Tasmania Basin for the benefit of all.

GSLM and Empire have independently verified projections which, if realised, will transform the financial and energy landscape of Tasmania. We would like the opportunity to present these exciting results to you in a meeting at your earliest convenience.

We look forward to working with you again on this project which we are convinced will be an important facet in the expansion of Tasmania’s economy and the living standards of its people.

Yours Sincerely,



Malcolm Bendall
Chief Executive Officer
Empire Energy Corporation International &
Great South Land Minerals Ltd

Encl.

- 1) Formal Application for EL 14/2009 – *Variation of exploration license under the Mineral Resources Development Act 1995*

CC: Registrar of Mines

Executive Summary

This document sets out the reasons and issues by which Great South Land Minerals Ltd (GSLM) and parent company Empire Energy International Corporation (Empire) seek the Ministers determination of *variation of exploration licence* under Section 31 (2a) of the Mineral Resources Development (MRD) Act 1995 which states ‘...on the application of a licensee, the Minister, by notice in writing, may vary the licence by – adding to, or reducing, the area of land comprised in the licence’.

GSLM and Empire request a variation (increase) of area of Exploration licence (EL) 14/2009 and query the tenure of EL 14/2009 for only 2 years. The grounds for seeking the variation are respectfully submitted following careful consideration. The submission requests that the Minister for Energy and Resources reconsiders the conditions of the current exploration licence (EL 14/2009) and makes an adjustment to vary the area granted to more accurately reflect GSLM’s work program and what GSLM and Empire believe are legitimate entitlements to the entire licence area. MRT have broken agreements and failed to deal with GSLM’s and Empires applications and not applied the AU\$50 million asset exemption.

GSLM and its predecessor companies, who through their investors have expended in excess of \$56 million over three decades, should be granted every opportunity to complete their comprehensive database, work program and fully develop EL14/2009 to full commercial production. The two year licence (issued in its current form) with an unspecified renewal period is an impediment to corporate financing and restricts the opportunity to realise the full economic potential of the Tasmania Basin.

GSLM and Empire have recently entered into various good faith agreements with financiers and creditors on the basis of minimum five (5) year tenure on its Exploration Licence. The success of capital raising efforts is largely contingent on being granted tenure and security, as it provides a platform for concise planning of future work commitments and the company’s business and exploration plans. GSLM has made binding commitments on the basis of an equitable and reasonable assessment of its EL 14/2009 application. Empire and GSLM’s professional expectation was that the approval of EL 14/2009 would be expedited and issued no later than December 2009. Unfortunately, this process has taken 8 months, the result of which has been that the Empire Rights Issue and consequent audit and SEC filings were also delayed by 5 months. This has jeopardized the commercial standing of GSLM with investors, contractors and creditors and has impacted on the current securitization by Sure Asset Management.

It is regrettable that the Tasmanian Government has not taken a lead from the Australian Federal Government’s handling of the Global Financial Crisis and moved to act in a swift and decisive manner with the approval of EL 14/2009, an action that would have greatly benefited the State’s prospects and the Tasmanian people. In addition, serious inappropriate leaks of documentation and information by MRT to OEHL may well have been illegal and breached both State and Federal laws.

GSLM appreciates that MRT under the Act have up to 12 months to assess GSLM’s application, however, it observes the coincidence that MRT informed the company about its proposed area on or about the same day (early March) MRT also advised that the Hunt Rig#3 had left Tasmania.

GSLM has been made aware of documented allegations that a senior executive of Overseas Energy Holdings Limited (OEHL) has represented to OEHL investors that MRT may recommend to the Minister that OEHL be granted the oil-prospective parts of former Special Exploration Licence (SEL) 13/1998.

At this time, the company deems it inappropriate that any portion of the former SEL 13/1998 area be advertised or offered for category 4 minerals, as an Exploration Release Area (ERA) by MRT, until these claims have been fully investigated in a transparent forum and resolved.

GSLM believes that the process relating to the decision to grant a reduced area of 3,108 km² constituting Exploration Licence (EL) 14/2009 for a two year term may have breached legislative provisions. Empire and GSLM assert that the application of EL 14/2009 was not processed appropriately or equitably and request an open and honest discussion to resolve all outstanding issues.

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1. Variation of increased area sought by Great South Land Minerals Ltd

- a) *Variation of exploration licence:* – Great South Land Minerals Ltd (GSLM) formally requests the Minister for Energy and Resources to vary (increase) the current area of Exploration Licence (EL) 14/2009 from 3,108 km² (current licence area granted on 17 May 2010 – Attachment 1) to 15,035 km² (Attachment 2).
- b) *Tenure:* - Additionally, GSLM query the outcome of the original EL 14/2009 application submitted to Mineral Resources Tasmania (MRT) on 30 September 2009. The application submitted comprised a 5 year work program and expenditure commitment for that period. However, only a 2 year Exploration Licence has been granted to GSLM over a significantly reduced area. In order to conduct a fully resourced and comprehensive exploration program, GSLM seeks a review by the Minister to increase the current 2 year tenure to 5 years with the option for a further 2nd 5 year term i.e. total finance requirement for 10 years. This will enable the company to embark on its expanded exploration program to further delineate the geologically defined structures contained within the area of former Special Exploration Licence (SEL) 13/1998. GSLM and Empire will demonstrate to MRT and the Minister that they have access to the technical and financial resources to satisfy all of the exploration benchmarks under the increased area if granted a full 5 year term.
- c) GSLM also considers that the former Empire Energy application, SEL 13/2009, that was withdrawn as a precondition for issuing EL 14/2009 (an application that was rejected again on 7 July 2010), should be reviewed.

2. Grounds for ‘variation of exploration licence’

- a) Exclusion of a condition from an agreement made between the Deputy Premier during 1998 and GSLM prior to the granting of SEL 13/98 regarding the issuance of EL 14/2009 (refer to Annexure 1 for supporting evidence);
- b) A recommendation to the Minister for Energy & Resources by MRT to reduce the original area applied for with EL 14/2009 (refer to Annexure 1 for supporting evidence);
- c) Exclusion of acreage within EL 14/2009 without prior consultation with GSLM (refer to Annexure 1 for supporting evidence);
- d) Recommended reduction of area by MRT that was not accompanied by a reduction in the mandatory expenditure (refer to Annexure 1 for supporting evidence);
- e) Exclusion of financial support documentation by Mineral Resources Tasmania (MRT) that was requested by the Department of Infrastructure Energy and Resources (DIER) and provided by GSLM for the new exploration licence application (refer to Annexure 1 for supporting evidence);
- f) The Tasmanian government precedent was not adhered to regarding a 50% reduction in area of a previous licence. The increase of the mandatory exploration expenditure as a licence condition resulted in an amount commensurate with four times the gazetted government guidelines (refer to Annexure 1 for supporting evidence);

- g) Exclusion of an undertaking made by MRT to GSLM/Empire during December/January 2009-2010 regarding the EL 14/2009 application. NB. MRT agreed that if GSLM withdrew its SEL 13/2009 application, the company would have sufficient financial resources to undertake and complete the submitted work program on EL 14/2009. Upon reaching agreement, GSLM promptly withdrew the SEL 13/2009 application to comply with the MRT's request. MRT proceeded to process the EL 14/2009 application but without prior consultation, arbitrarily reduced the term and area and disregarded the exemption from proof of funds that attributes to a company with an asset value exceeding \$50 million (refer to Annexure 1 for supporting evidence);
- h) The reduction in the area of EL 14/2009 was not accompanied by a reduction of rental fees already paid (refer to Annexure 1 for supporting evidence);
- i) The prolonged application process has resulted in the removal of the Hunt Energy Rig #3 from Tasmania. That has had an immediate and substantial impact on the company due to the loss of its prepaid mobilization costs to Hunt Energy (refer to Annexure 1 for supporting evidence);
- j) GSLM has been given documentation that indicates a senior executive of Overseas Energy Holdings Limited (OEHL) has represented to OEHL investors that MRT may recommend that OEHL be granted sections of the former SEL 13/1998 that contain GSLM's legitimate discoveries. GSLM believes that some of its "commercial in confidence" documents may have been given improperly by MRT to OEHL funders and shareholders that may have breached State and Federal laws (refer to Annexure 1 for supporting evidence);
- k) The Company has already made commercial commitments and signed provisional contracts (USA drill rig (GEFCO SS-1100) / Terrex Seismic) based on receiving the area and tenure that would equate to accepted government guidelines (refer to Annexure 1 for supporting evidence);
- l) Financial loss to GSLM and Empire due to the exclusion of 80% of the prospective structures already discovered during the term of SEL 13/98 that have a current independent market value of over US\$1 billion. (refer to Annexure 1 for supporting evidence); and
- m) Cancellation of Bellevue #1 and Thunderbolt #1 drilling permits. (refer to Annexure 1 for supporting evidence).

3. Conclusion and request to the Minister for Energy and Resources

Since 1977, GSLM and its predecessor companies have accumulated over 33 years of exploration research and experience in oil and gas within Tasmania. GSLM has solely developed comprehensive gravity-, magnetic-, and seismic data bases that established that oil and gas does exist and is prospective over the Tasmania Basin. Furthermore, GSLM (and predecessors) have invested over \$56 million, which has been achieved without any significant assistance from industry or the Tasmanian Government.

GSLM and Empire believe that they have experienced undue hardship due to the prolonged government assessment process relating to the granting of a reduced EL 14/2009. GSLM believes that the process relating to the decision to grant a reduced area of 3,108 km² constituting Exploration Licence (EL) 14/2009 for a two year term may have breached

legislative provisions and made the commercial position of the company untenable. Therefore, GSLM will be seeking a review under the *Judicial Review Act 2000* relating to the decisions made by government relating to EL 14/2009 and SEL 13/2009. In particular, GSLM believe Section 17, 18, 20 and 21 (below) of the *Judicial Review Act 2000* may have been breached, however, may not be limited to these sections.

- i. Section 17 (1), (2 a, g and h): Application for review of decision;
- ii. Section 18 (2 a, g, h): Application for review of conduct related to making of decision;
- iii. Section 20 (b, d and i): improper exercise of power;
- iv. Section 21: Decisions without justification – establishing ground.

GSLM hope to achieve a fair and reasonable assessment from the *Judicial Review Act 2000* to allow the company to fully develop its legitimate discoveries made during its tenure of SEL 13/1998 and pursue all of the discoveries it has proven to be deemed as prospective areas over the Tasmania Basin based on GSLM's previous and exclusive work.

GSLM requests that the Minister reconsiders the conditions of the current exploration licence (EL 14/2009) and negotiates with GSLM for an adjustment to the area granted to more accurately reflect GSLM's previous exploration effort and its legitimate entitlements. The government has a responsibility to the Tasmanian people and investors who have supported this project, to ensure that GSLM has every opportunity to complete its program and bring the tenement into full production. The two year licence (issued in its current form) with an unspecified renewal is an impediment to financing and the opportunity to realise the full potential of the Tasmania Basin in the current economic environment.

Empire and GSLM believes that accepted industry standards indicate that the original application for 7,513 km² together with the stated work program should have been accepted by MRT as it met all of the mandatory prerequisites. Reducing the area of the former SEL 13/98 tenement from 15,035 km² to 3,108 km² is not considered by the company to be an equitable outcome. MRT further reduced the area from that which was advertised on 17 March 2010 from 3,180 km² down to 3,108 km² (due to a late exclusion of coal licences) in contravention of its own stated policy. It has created a significant 'loss of faith' in process and negates the assurances already given by MRT to GSLM.

GSLM's application for 7,513 km² was made following concise planning and was considered within the scope of accepted industry guidelines. GSLM believes that it has sufficient financial resources and exploration expertise to provide reasonable grounds for request of variation of its licence area from its current allocation of 3,108 km² to 15,035 km². The request should be considered as a submission for a formal application of variation of area under Section 31 (2a) of the MRD Act 1995.

GSLM seeks a fair and reasonable negotiation based on an increased financial, technical and human resources commitment that satisfies the mandatory criteria gazetted for a tenement of this size. GSLM and Empire Energy respectively request fair and equitable treatment in respect to negotiating a satisfactory variation of EL 14/2009 and seek the Ministers determination that allows the company to fully develop its legitimate discoveries made during its tenure of SEL 13/1998. GSLM seeks a variation of area that comprises the 15,035 km² contained within the former SEL 13/1998 to be granted under a varied EL 14/2009. The amended EL 14/2009 will provide GSLM the opportunity to commercialise its discoveries and underpin the Tasmanian economy with a much needed revenue stream. GSLM is confident it can be in production within two years if it has the support in principle from the Tasmanian government.

Annexure 1 – Information supporting the grounds stipulated in (2)

a) Exclusion of a condition from an agreement made between the Deputy Premier during 1998 and GSLM prior to the granting of SEL 13/98 regarding the issuance of EL 14/2009.

A number of conditions were agreed to between the Deputy Premier and GSLM on 23 December 1998 that included a condition that states “...*At the end of the licence period [SEL 13/98] the more prospective areas must be converted to exploration licences with appropriate conditions, if continued tenure is required.*” (Attachment 3)

GSLM sought continuity of tenure as described above. This was detailed in its exploration licence application submitted to MRT on 30 September 2009 (EL 14/2009).

The investment of \$50 million during the past 10 years (refer to Attachment 4, Table 14, page 65-66) was based on the conditions sought prior to the granting of SEL 13/98 namely the guarantee of a continuation of exploration over GSLM’s prospective areas.

The area recently granted by the Minister of Energy and Resources excludes over 80% of the prospective oil and gas bearing structures that GSLM has discovered during the past 10 years (refer to map from Attachment 5). The excluded structures have been independently verified by RPS Energy during August 2008 (Attachment 6, Table 2, pg.2 & Figure 20. pg.42). The valuation of the discovered structures was reported by an independent Australian accounting firm, WHK Denison, as \$3.3 billion (Attachment 7, pg.4 & 6) prior to the end of SEL 13/98 on 30th September 2009. It is estimated that the structures not included in EL 14/2009 that were discovered by GSLM are valued at US\$1.108 billion (Attachment 8, Attachment 7, pg.3). The majority of these prospective structures are located in the northeast section (Attachment 6, pg 20) of the former SEL 13/98. The area containing these excluded discoveries was contained within the original EL 14/2009 application made by GSLM on 30th September 2009.

GSLM formally requests a negotiation with the Minister for Energy & Resources regarding a variation of area as it believes it has a legitimate right to its discoveries (confirmed by a previous condition from the Tasmanian Government) and based also on its previous performance during the tenure of SEL 13/1998. GSLM seeks a variation in area in order to be granted the most prospective areas discovered by the company during the term of SEL 13/1998 in order to professionally plan its current exploration program.

b) A recommendation to the Minister for Energy & Resources by MRT to reduce the original area applied for with EL 14/2009.

The work program submitted by GSLM in the original EL 14/2009 application includes all the prospective structures discovered by the company. (See outlined map - Attachment 9).

GSLM’s future work program (Attachment 10) has been carefully planned to:

1. Improve the definition of currently identified prospective anticline/structures (domes) and other suitable reservoir structures;
2. Continue to determine the extent of the three petroleum systems that have been outlined within the former SEL 13/98 area;
3. Define more potential petroleum targets; and
4. Drill existing targets already defined through an exploration program, commencing with Bellevue #1 and Thunderbolt #1.

GSLM notes that the recommendation to the Minister of Energy and Resources (Attachment 11) omitted key work program objectives (namely objectives 1-3 as defined above) from GSLM's application.

GSLM notes in MRT's letter of 22 December (Attachment 12) whereby it states that '*Work program ELA 14/2009: we note that there are large areas within the application area for which no work is proposed. You may consider reducing the size of the application area to cover those areas in which you wish to undertake exploration work.*' GSLM believes that the statement is incorrect and has been refuted by GSLM's reply to the department in Question 6 contained in the letter of 15 January 2010 (Attachment 13) and also the letter of 12 March 2010 (2) (Attachment 14). GSLM has committed to seismic and drilling activities, some of which had already commenced leading up to the end of SEL 13/98 (E.g. drilling of the Stockwell top hole, associated environmental studies and negotiations with Terrex Seismic for a new seismic program).

It is noted in MRT's letter of 15 February 2010 that recommendations were made for two smaller parcels of land (Attachment 15). The original 'possible area' proposed to GSLM by MRT covered only 18% of the Bellevue and Thunderbolt structures. An area of this size would have equated to an approximate mandatory expenditure for the first two years of ~AUD\$730,000. Both the Thunderbolt and Bellevue structures are defined as having a combined area that exceeds 4,200 km². GSLM estimate that the initial two parcels of ground recommended by MRT represented a combined area of less than 1,000 km².

No consultation was held between MRT and GSLM regarding the rationale for a reduction in area despite several requests being made formally to discuss the issues. (See correspondence on 22 February 2010 - Attachment 16). Representations were made personally at the MRT offices by the CEO of GSLM, Malcolm Bendall and four (4) other representatives on 24 February 2010. All Meeting requests were denied by MRT's letter of 26 February 2010 (Attachment 17) which states, incorrectly '*At no time have either my personal assistant or I received any request to meet.*' (Also refer to Attachment 18).

A meeting was held between the former Minister, Hon. David Llewellyn and CEO Malcolm Bendall on 25 February 2010. It was Mr Bendall's understanding from discussions in the meeting that if several requests by the former Minister were satisfactorily addressed by GSLM, the company could expect to negotiate a satisfactory outcome regarding the reduced area of EL 14/2009 (refer to Attachment 19 – 12 March 2010 (1) letter). GSLM believes it fully addressed all of the criteria referred to by the former Minister.

Further concerns were expressed in two additional letters (Attachment 14 and Attachment 18) sent to MRT on 12 March 2010. This correspondence established that GSLM adequately satisfied the prerequisite assessment criteria based on the area of 7,513 km² that it applied for. The letters (Attachment 14 and Attachment 18) sent by GSLM to MRT were responded to on 17 March 2010 with '*Your comments have been noted*', however, the major outstanding issues were still not addressed. GSLM now requests that all unresolved issues are renegotiated, particularly regarding the reduction in area initially applied for in the EL 14/2009 application.

Work undertaken at the Stockwell drill site included; signing off on the Rental Agreement with the landowner; drilling the pre-collar 'top hole'; completing the acoustic survey; discussion with numerous industry consultants as the initial groundwork for a dedicated oil and gas well as well as road, dams and work platform construction. An infill gravity survey was also completed over the Stockwell site and several other structures.

EL 14/2009 should be varied in area to include all of the previously discovered structures and all of the prospective areas, as identified within the exploration work program that outlines the activities conducted under SEL 13/1998. Failure to vary the area and restore to EL 14/2009 all of the discoveries and explored ground may severely impinge the company's future funding, research and exploration program. Existing and proposed seismic lines with the location of the prospective structures incorporated within this entire area are included in the application plan originally submitted to MRT on 30 September 2009.

c) Exclusion of acreage within EL 14/2009 without prior consultation with GSLM.

The area not granted had numerous site studies, extensive negotiation and Rental Agreements with land owners, plus expensive valuations by RPS Energy, based on GSLM's regional seismic, geological and geophysical studies. GSLM also completed drilling the top hole at Stockwell (located in northeast of application area) and commenced site works. These concerns have been addressed in correspondence to MRT on 12 March 2010 (Attachment 14, page 7).

In contrast, there was an area granted to the south and north of our licence application area that contained no seismic studies, limited gravity data, no substantial environmental works and no identified structures. The licence conditions were significantly different to those imposed upon the other area applied for by GSLM.

Based on previous research, GSLM believe that some of the structures in the east maybe more prospective for oil and gas than in the south. Therefore, GSLM request that all excluded portions from the EL 14/2009 application are included to facilitate further exploration and resource definition. GSLM believes the entire area of 15,035 km² granted under the original SEL 13/1998 should be varied under EL 14/2009 and restored.

d) Recommended reduction of area by MRT that was not accompanied by a reduction in the mandatory expenditure.

The work program submitted in GSLM's original application covers the entire 7,513 km². The work program expenditure commitment for this 7,513 km² area for the first two years was \$7,550,000. Notwithstanding that this \$7,550,000 is double the '*minimum expenditure requirement*' required by MRT (Refer to Attachment 20, summarised in Table 1 below), GSLM note that this expenditure had not been reduced commensurate with the area that has been granted (refer to Table 2 below).

As GSLM wishes to embark on its full exploration program, it now seeks a variation of area to reflect the *minimum expenditure requirement* of 15,035 km², as compensation for previous commitments outlined within this document.

Table 1. MRT - Minimum Expenditure Requirement. The Minister for Energy and Resources approved a reduction in the minimum expenditure requirements for Exploration Licences on 27 February 2007. Minimum expenditure requirements per square kilometre may still increase during the life of the licence, but have been reduced as listed below.

<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Year 4</i>	<i>Year 5</i>
\$200	\$300	\$500	\$700	\$1000

The area currently allocated to GSLM for EL14/2009 is 3,108 km² yet the mandatory exploration expenditure for years 1 and 2 is stipulated by MRT as \$7,550,000 (Attachment 5, Schedule 2, Item 2). Calculations of mandatory expenditure for years 1 and 2 by MRT

demonstrate that these calculations have been made based on an area exceeding 15,035 km² not 3,108 km² as per the allocated area granted to GSLM under EL 14/2009.

Table 2. GSLM Comparison of expenditure rates as per MRT rates above.

		Area 3,108 km ²	Area 7,513 km ²	Area 15,035 km ²
Year 1	\$200 per km ²	\$621,600.00	\$1,502,600.00	\$3,007,000.00
Year 2	\$300 per km ²	\$932,400.00	\$2,253,900.00	\$4,510,500.00
	Total	\$1,554,000.00	\$3,756,500.00	\$7,517,500.00

Historically, the Australian industry guidelines recommend that applications made by companies that reapply for an area should be conditional on either half the area of an exploration acreage given or alternatively, double the mandatory expenditure.

The original EL 14/2009 application submitted by GSLM on 30 September 2009, GSLM halved its former SEL 13/98 area and also doubled the expenditure commitment required under MRT expenditure rates.

MRT's recommendation to the Minister for Energy and Resources was to maintain GSLM's proposed higher expenditure while at the same time arbitrarily reducing the area allocated to 41 percent of the original area applied (7,513 km²). The proposed expenditure outlined in GSLM's work program should have been adjusted down on a pro rata basis to reflect the reduction in the area the Minister granted. Based on the current minimum expenditure guidelines gazetted by MRT (refer to Table 2 above) GSLM requests that the licence area be varied to 15,035km² to comply with those guidelines. It is unreasonable that GSLM is forced to accept the increase in mandatory expenditure when it is applied to the vastly diminished area that has been granted.

e) Exclusion of financial support documentation by Mineral Resources Tasmania (MRT) that was requested by the Department of Infrastructure Energy and Resources (DIER) and provided by GSLM for the new exploration licence application.

GSLM believes it has been misled by the directive given by DIER and MRT. It should be noted that the requirement of '*financial capacity*' was met prior to the end of SEL 13/98 on 30 September 2009 on the basis that its asset value was in excess of \$50 million and be therefore exempt from the financial capacity tests gazetted in the application criteria.

Based on the recommendation made to GSLM by DIER through correspondence received 17 July 2009: '*To ensure that your financial capacity is clearly presented in relation to the new applications I would suggest that you provide supporting independent analysis of your financial capacity for these applications from, for instance, a respected Australian accounting firm*' (refer to Attachment 21). In order to comply with this request GSLM sought an independent valuation by respected Australian accounting firm, WHK Denison. The independent valuation encompassing the prospective structures contained within SEL 13/98 was deemed by WHK Denison to be US\$3.3 billion (refer to Attachment 7). This report was attached to our EL 14/2009 application and was the sole prerequisite required in accordance with correspondence forwarded by the Deputy Secretary of DIER on 17 July 2009. GSLM legitimately had tenure of a US\$3.3 billion asset that applied to a company in exploration mode, specifically, undiscovered prospective structures based on GSLM's seismic, geological and geophysical testwork that was conducted and verified as being of a high international industry standard.

GSLM followed DIER's advice in demonstrating 'financial capacity' for the new licence application and the document demonstrated financial capacity at the time of application. In contradiction to DIER's advice and WHK Denison's independent valuation, MRT advised during a meeting with GSLM on 21 December 2009 (Attachment 22 (a)), that "*the valuation appeared to be a dictated response, not independent.*" It should be noted that the US\$3.3 billion Valuation has been directly referred to in the recent Empire 10K audited accounts filed with the Securities and Exchange Commission (Attachment 23, pg 26). The 10K filing was confirmed and approved by Empire and GSLM's USA independent Audit firm and subsequently by the Securities Exchange Commission (SEC) who on that basis also approved Empire's S1 Registration Statement application.

It was during this same meeting (21 December 2009) that MRT confirmed the following: "*The application form requires that applying entities are required to have available sufficient funds to cover the programmes.*" GSLM believe that previous recommendations made by the Deputy Secretary of DIER were disregarded for GSLM's application and the fact that GSLM should have been exempt from the test because it had an Asset valuation greater than \$50 million at the time.

GSLM incurred considerable expense to obtain an independent financial report that demonstrated its ongoing financial capacity to fund its stated work program. A phone call by MRT to WHK Denison would have promptly substantiated the validity of the WHK report and alleviated any concerns MRT may have had regarding its preparation (refer to Attachment 7).

f) The Tasmanian government precedent was not adhered to regarding a 50% reduction in area of a previous licence. The increase of the mandatory exploration expenditure as a licence condition resulted in an amount commensurate with four times the gazetted government guidelines.

The application for 7,513 km² was considered well within the scope of accepted practice within the oil and gas industry and its guidelines, particularly when the stated work program and expenditure, exceeded double what was required as a minimum. The reduced area currently granted under EL 14/2009 is not considered to be:

1. Fair treatment in commercial equity;
2. Acceptable as standard industry practice;
3. A basis by which a sound geological and commercially responsible application should be treated, particularly when GSLM's work has indicated the entire 15,035 km² may be prospective (a pre-requisite to applying for the whole or a substantial part of the whole Licence area).

The recommendation made by MRT has not taken into account the prior performance of GSLM and the extensive benchmarks it has met during the ten (10) year tenure of SEL 13/1998. A 50% reduction in area has been established as a historical precedent by the current Minister, The Hon. Mr Bryan Green, in previous dealings with GSLM regarding SEL 13/1998 and administrative matters associated with issuance of licence conditions imposed upon GSLM (refer to Attachment 24).

In referring to the letter dated 11 June 2004 from Minister Bryan Green to GSLM concerning the appropriate reduction of the original SEL 13/1998 area of 30,356 km², it was stated, "*The renewal shall apply to maximum area of 15,000 km² selected by you from the area originally granted. Great South Land Minerals Limited (GSLM) shall provide Mineral Resources*

Tasmania (MRT) within one month of the date of this letter a map showing the 15,000 km² deemed to be of highest priority for renewal” (Attachment 24).

GSLM believes the former Minister has successfully established the Tasmanian industry criteria for reducing any existing licence area with this statement, and that this is the appropriate ratio to be applied in this situation. GSLM halved the area of the second 5 year term of SEL 13/1998. Using this accepted practice as a precedent, GSLM also doubled its minimum expenditure in the EL 14/2009 application.

MRT reduced the area by 80% yet quadrupled the mandatory expenditure requirement. The mandatory expenditure requested by MRT would justify an area of 15,035 km² be granted to GSLM as shown in Attachment 2.

The original area applied for under application EL 14/2009 of 7,513 km² represents over a 50% reduction of the former 5 year period and area of SEL 13/1998. Using the prerequisite conditions of SEL 13/1998 and a past directive from the Minister, GSLM believes it is legitimately entitled to apply for ‘all prospective areas’ which represents the entire area of 15,035 km² comprised within the former SEL 13/1998.

The final area recommended by MRT to the Minister (and granted) was 3,108km². This represents 41% of original area applied for (N.B - It should be noted that the final area relating to EL 14/2009 granted to GSLM actually differed to that which was advertised in the local paper due to an exclusion of some coal licences). Given GSLM’s past performance the company deems it reasonable to apply to vary its area commensurate with the original area of 15,035 km² (including the current 3,108 km²) and hence this should be considered as a submission for application of variation of area under section 31 (2a) of the MRD Act.

g) Exclusion of an undertaking made by MRT to GSLM/Empire during December/January 2009-2010 regarding the EL 14/2009 application. NB. MRT agreed that if GSLM withdrew its SEL 13/2009 application, the company would have sufficient financial resources to undertake and complete the submitted work program on EL 14/2009. Upon reaching agreement, GSLM promptly withdrew the SEL 13/2009 application to comply with the MRT’s request. MRT proceeded to process the EL 14/2009 application but without prior consultation arbitrarily reduced the term and area and disregarded the exemption from proof of funds that attributes to a company with an asset value exceeding \$50 million.

GSLM believes it has been misled by the assurances that were given at the time. During a meeting on 21 December 2009 between GSLM and MRT (Attachment 22 (b)) it was made clear to GSLM that the US\$9.3 million raised via the Rights Issue was not viewed by MRT as sufficient capital needed to fund both applications (EL 14/2009 and SEL 13/2009). Furthermore, *that between the two applications, EL 14/2009 & SEL 13/2009 that the rights issue proceeds of USD\$9.3 million are sufficient to meet those programmes and service the liabilities of Empire and GSLM; as SEL13/2009 alone requires AUD\$7.5 million.*

In the same meeting, MRT confirmed only one application would be sufficiently resourced by the proceeds of the Rights Issue.

In a letter to MRT on 15 January 2010, Empire Energy requested the ‘temporary’ withdrawal of the SEL 13/2009 application on the basis of its understanding and agreement relating to the meeting on the 21 December 2009. That is, if Empire/GSLM were to nominate one of the its two applications, and MRT confirmed the evidence of, and proceeds to be derived from the

USD\$9 Million Rights Issue, it would be sufficient to fully fund one of its Licence applications, which, in this case, is represented by application EL 14/2009 (Attachment 25).

The government responded to Empire's letter of the 15 January 2010 on 25 January 2010 stating *that the Special Exploration Licence Application SEL13/2009 from Empire Energy Corporation International was withdrawn from the Register on 22 January 2010* (Attachment 26).

On 17 March 2010, Empire Energy formally requested that MRT reinstate application SEL 13/2009 based on what GSLM believe to be a dishonoured agreement (Attachment 27). However, a reply by MRT on the 23 March 2010 stated SEL 13/2009 was withdrawn from the Register on 22 January 2010, the application is no longer pending and there are no provisions in the Mineral Resources Development Act 1995 to reinstate an application once it has been withdrawn (Attachment 28).

GSLM believes it has been misled by the assurances it was given by the Government as total tenure and area were not recommended to the Minister for Energy and Resources as applied for with EL 14/2009. Consequently, GSLM seek a variation of area as described in (1) based on the supporting information provided.

h) The reduction in the area of EL 14/2009 was not accompanied by a reduction of rental fees already paid.

Rental rates charged for EL 14/2009 3,180 km² as per Invoice No. 008099, dated 4 March 2010 (Attachment 29). Rental of \$4,642.80 (3,180 km² at \$1.46 per km²) must be paid. The rental includes a GST component of \$422.07. Actual area approved under EL 14/2009 was reduced from 3,180 km² to 3,108 km² at \$1.46 per km² = \$4,537.68 with a GST component of \$412.51 (Attachment 5).

This equates to a difference of \$105.12 rent overcharge for the tenement. No refund for the difference was returned to GSLM. This demonstrates the lack of proper process and diligence practiced by MRT when dealings with GSLM and Empire Energy's applications. Notwithstanding this shortfall, GSLM now request to vary its area to 15,035 km² and is prepared to pay any difference in the rental fees associated with this change.

i) The prolonged application process has resulted in the removal of the Hunt Energy Rig #3 from Tasmania. That has had an immediate and substantial impact on the company due to the loss of its prepaid mobilization costs to Hunt Energy.

Refer to letter of 12 March 2010 titled '*URGENT – Failure to deal with application EL14-2009 (2) – Background*' (Attachment 14).

Objections relating to EL 14/2009

MRT correspondence received by GSLM on 21 April 2010 (Attachment 36) stated that three objections had been lodged prior to the granting of exploration licence application EL 14/2009. A summary of the meeting times and basis for the objections were provided within this same correspondence, however, advice obtained by GSLM (Attachment 37) in respect to these objections, suggested that based on the information MRT provided to GSLM, the three objections were not legally valid.

Two of the objections tabled were submitted by creditors. Neither creditor had an estate or interest in any land within the area published under Section 14(2) of the MRD Act 1995. The

Act clearly contemplates that it is an adverse effect on that estate or interest in the land which constitutes the basis or grounds for objection. The third objection was by a landowner within the published area seeking clarification of the specified processes and protocols governing access by a licence holder to privately owned land.

There was a request to MRT to release copies of these objections to GSLM prior to the proposed mediation times so that GSLM could fully prepare to deal with the objections. This request was denied by MRT and GSLM's legal representatives were therefore prevented from giving detailed advice with respect to dealing with the three objections.

j) GSLM has been given documentation that indicates a senior executive of Overseas Energy Holdings Limited (OEHL) has represented to OEHL investors that MRT may recommend that OEHL be granted sections of the former SEL 13/1998 that contain GSLM's legitimate discoveries. GSLM believes that some of its "commercial in confidence" documents may have been given improperly by MRT to OEHL funders and shareholders.

The allegation has stemmed from earlier activity that was commercially detrimental to GSLM and Empire Energy (Background).

The original GEFCO SpeedStar 185K Rig (Attachment 30) was purchased by Empire Energy in 2007 for USD\$1,300,000. It was driven from the factory in Enid, Oklahoma to a shipping port facility in Houston, Texas and shipped to Melbourne, Australia, where it passed through Customs and was then shipped to Devonport Tasmania, Australia. Upon arrival in Devonport, it was stored in Spaulding Drillers yard where it was upgraded to meet Australian Drilling Rig Standards. It was certified to Moduspec's Inspection standard and was approved to drill in Australia.

A six man drill crew were inducted through an international standard blowout prevention school at a cost to Empire of over USD\$100,000. When the drill rig was ready to drill and the crew was successfully trained and ready, GSLM then head hunted an ex-Halliburton drilling supervisor, Mr Al Sehsuvaroglu, and appointed him as CEO of GSLM. Mr Sehsuvaroglu was to work with Michael Roberts (Chairman of the Board of Empire Energy) to continue drilling operations. Malcolm Bendall resigned from the Board and both of these two men (Al Sehsuvaroglu and Michael Roberts) assured Mr Bendall that they had access to USD\$5,000,000 to drill ahead and intended to do so, with the previously described GEFCO 185K rig and crew.

Mr Bendall was therefore surprised to receive a copy of a letter of default and demand from Windy City, who had security over the GEFCO 185K rig 10 days after it had been sold, without a proper auction and as a result, triggering a default on a critical financial instrument, Wind City Floating Rate Note. Mr Bendall was forced to raise USD\$4,000,000 in 20 days to prevent Empire Energy from liquidation. The default on the financial instrument triggered by the Rig (GEFCO SpeedStar 185K) sale severely affected Empire Energy's financial position. The remaining Empire Directors were forced to remove Mr Al Sehsuvaroglu and Michael Roberts from the Empire and GSLM Boards, as their actions were considered to be jeopardising the company's commercial viability.

The Chairman, Michael Roberts argued with Al Sehsuvaroglu that the GEFCO 185K rig was not capable or appropriate to drill the Bellevue well upon which the rig was sold to Atlas Drilling. It should be noted that since the purchase of the rig, Atlas Drilling have drilled 45km with the deepest hole being 2.6km (based on personal communication between Malcolm Bendall and Atlas Drilling).

In a meeting at MRT offices, attended by Empire director, Dr Clive Burrett, Michael Roberts as Chairman of GSLM and Empire, stated that if Empire had its licence (SEL13/98) revoked/expired he would be interested in taking up the entire area. Mr Robert's intent is clearly and publically evident despite his position at the time as Chairman of GSLM and Empire.

Mr Roberts has already taken up the northern part of SEL 13/98 that GSLM relinquished at the end of the 1st 5-year term of SEL13/98 (now SEL 5/2005). GSLM believe OEHL's current terms and conditions for SEL5/2005 are more favourable than that imposed on GSLM's EL14/2009 licence.

GSLM believe Mr Roberts contracted Hunt Energy to entice and remove their Hunt Rig#3 from Bellevue #1 well and drill a hole for OEHL at Hadspen (Westwood) within the SEL5/2005 tenement. The site OEHL drilled was only 400m off GSLM's 2001 seismic survey which had a 5km gap in the seismic acquisition due to rare nature grasses that had been preserved along that highway verge. Michael Roberts used a diviner, to site the Westwood well. It was alleged the diviner used whale bones to determine the presence of hydrocarbons for this well. OEHL drilled at Westwood, and Attachment 31 shows an email his geologist sent to Empire/GSLM's Chief Geologist seeking assistance as they did not know what they were drilling and where they were in the geological sequence.

The initial GEFCO 185K rig was 'fit for purpose' and did have the capacity to drill Bellevue and opinions to the contrary have been proven to be incorrect. In addition, its 185,000 pound pull back, could set into place the 60,000 pound 8 ½ inch casing to 1,600 meters and the 13 ½ inch casing to 243 meters now. In fact, the visit by Malcolm Bendall to Enid Oklahoma in February 2010 confirmed with the rig's builders its technical capacity to 10,000 feet. Thus, the GSLM drilling program was severely compromised by the actions of the then CEO Al Sehsuvaroglu and Chairman Michael Roberts after they improperly disposed of the GEFCO 185K rig.

Summary of meeting notes from an Overseas Energy Holdings Limited shareholder.

GSLM received a visit from a consultant petroleum geologist working with OEHL who expressed concerns over information provided to him by representatives of OEHL regarding oil and gas drilling and the ongoing exploration proposed for Tasmania. A detailed discussion was held on 2nd & 3rd June 2010 regarding OEHL activities with the investor, where Paul Heath, Clive Burrett, Nicole Chesterman and CEO Mr Malcolm Bendall were present.

Two of OEHL's investors were allegedly provided with information that led them to believe that they would have a reasonable chance of securing an interest in the area covered by GSLM's SEL 13/1998 based on the goodwill exercise of drilling Westwood#1. Therefore, on the basis that the former SEL 13/1998 in its entirety was to be advertised, an investment was made into OEHL. This OEHL investor is seeking a full recovery of monies invested in OEHL to date as compensation for the representations made by OEHL and its principals.

On the 2nd June, 2009 an OEHL investor met with MRT to discuss the due diligence aspects of OEHL's tenement SEL 5/2005 and any prospective release areas that had expired as at 30 September 2009. It is alleged that a senior MRT officer indicated that a large proportion of the area was to be advertised imminently. The officer in question then showed the OEHL investor the area subsequently granted to GSLM as EL 14/2009. The OEHL investor commented on why GSLM was granted such a small area, and why did the company not apply/reapply for the

entire SEL 13/1998 area. This question was not directly answered by the MRT representative and the OEHL investor confirmed he did not understand the rationale why GSLM would have to accept such a significant reduction in area (i.e. 3,108 km²), flagging genuine concerns over sovereign risk in Tasmania.

This OEHL investor advised GSLM that on the same day of 2nd of June 2009, a senior MRT representative gave him a copy of a Final Report document for SEL 13/1998 created by GSLM. This report was the property of the State of Tasmania. The Report was subsequently given to CEO Malcolm Bendall at a meeting with the investor in the USA.

k) The Company has already made commercial commitments and signed provisional contracts (USA drill rig (GEFCO SS-1100) / Terrex Seismic) based on receiving the area and tenure that would equate to accepted government guidelines.

GSLM has signed provisional contracts to facilitate the drilling of both the Bellevue #1 and Thunderbolt #1 sites and upon receiving the successful variation of its acreage, the additional 10 discovered structures. In March 2010 parent company Empire Energy secured a conditional contract agreement through GEFCO Inc of Enid, Oklahoma, for the provision of a mounted GEFCO SS-1100 drilling rig (Attachment 32 - media release -17 May 2010). The GEFCO SS-1100 rig is capable of drilling both horizontally and vertically to a depth of 4,572m and has been carefully selected for its suitability for GSLM's Tasmanian drilling terrain and requirements. The agreement was made in the expectation that the rig would be drilling a minimum of six holes in the Tasmania Basin during the first five years of the program (refer to original application work program and expenditure – Attachment 10).

Therefore, GSLM request that 1(a) and (b) of this document are addressed by the Minister for Energy and Resources.

GSLM's drilling and exploration program includes contracting Terrex Seismic of Western Australia to return to Tasmania and conduct an extensive seismic program in new prospective areas (Attachment 33). As permits need to be prepared and approved prior to any on ground commencement, the area granted needs to be adjusted prior to the signing off on formal work agreements with Terrex Seismic. The preparation of these extensive permits may take at least 8-12 months for assessment by MRT (based on evidence on the previous applications submitted to MRT and advised in correspondence from MRT (Attachment 34) regarding the issuance on EL 14/2009). It is not uncommon to have to book the proposed seismic trucks 12-24 months in advance for a program of this size and complexity.

Due to MRT recommending the reduced area of EL 14/2009, GSLM cannot proceed with its current seismic proposal. Without the assurance of being returned the area described in 1(a) future exploration capability of GSLM's exploration initiatives have been substantially impaired.

l) Financial loss to GSLM and Empire due to the exclusion of 80% of the prospective structures already discovered during the term of SEL 13/1998 that have a current independent market value of over US\$1 billion.

EL 14/2009 represents a 41% reduction from GSLM's original 7,513 km² (1,856,502 acres) application. The undiscovered potential resource estimates are a result of Empire's and GSLM's (and predecessor companies) \$56 million investment over the past 33 years (Attachment 4, pages 138, 141 to 148). Empire and GSLM believe the remaining area, which encompasses a further 10 (ten) seismically defined prospective resources (refer to Table 2, Attachment 6), is estimated by RPS Energy to contain a further resource potential of 222 million barrels of oil.

This has an undiscovered potential commercial resource value of US\$1.108 billion (AUD\$1.23 billion) at the discounted US\$5 per barrel (Attachment 7). At current world prices of US\$80 per barrel the undiscovered potential commercial resource would be worth US\$17.74 billion (AUD\$19.73 billion).

It was also noted in the Empire Energy Press Release of 28 April 2010 (Attachment 8) that Empire Energy's current market capitalization and share price was 200 times less than the current asset value of US\$2.23 billion (AUD\$2.48 billion) comparative market value. Furthermore, Mr Bendall stated in an Empire Energy Press release that *"We have formally submitted notice of our appeal to Mineral Resources Tasmania's (MRT) decision and asked for the department to expand the licence area to include the full area (1.84 million acres, 7,450 square kilometers for which exploration licence EL 14/2009 was originally applied for and which contained most (over 80 percent) of our seismically defined prospective structures."*

Please also refer a recent Due Diligence report published in March 2010 (Attachment 35) from Empire Energy and GSLM which contains further proof of valuations of the Bellevue and Thunderbolt by RPS Energy.

GSLM has entered into various good faith agreements with creditors and financiers on the basis of a continuing tenure security. GSLM's capital raising efforts are also based on the foundation of being granted tenure, security and forward work commitments all of which are pivotal to the company's business and exploration plans. The company has made prescribed financial commitments to creditors on the basis of a reasonable assessment outcome stemming from its EL 14/2009 application. GSLM's reasonable expectation was that EL 14/2009 would be expedited and issued by December 2009. This was not the case and the Rights Issue and consequent audit and SEC filings were delayed by 5 months. This has frustrated fundraising efforts and jeopardized the commercial standing of GSLM with contractors and creditors.

m) Cancellation of Bellevue #1 and Thunderbolt #1 drilling permits.

MRT cancelled the original Bellevue #1 and Thunderbolt #1 permit at the end of SEL 13/1998 term. It was indicated in Exploration Licence (EL 14/2009) correspondence from MRT to GSLM on 27 May 2010 (Attachment 5) that *'in order to obtain approval to drill the Bellevue and Thunderbolt wells, you must submit a work program to MRT and receive written approval to proceed'*. It was noted in the same document that *'whilst it may be possible to reuse some documents, in particular vegetation, hydrological and archaeological reports, a new application for approval to drill must include everything on the checklist.'*

MRT cancelled GSLM's permit despite the fact that GSLM had the Hunt Rig #3 at the Bellevue site ready to drill. Drilling Contractor, Hunt Energy was aware of this situation. The delay and uncertainty surrounding the issuing of EL 14/2009 and the cancelling of permits (Bellevue and Thunderbolt) were precursors to the removal of the Hunt Rig #3 from Tasmania. MRT also advised GSLM that the Hunt Rig #3 left Tasmania on or about the same day (early March) MRT provided a map of the proposed area it intended to recommend to the Minister for Energy and Resources for EL 14/2009.

Empire and GSLM believe the Bellevue #1 and Thunderbolt #1 Permits should have been separate to the Licence. GSLM believe the Bellevue #1 and Thunderbolt #1 permits may have been improperly cancelled and therefore formally request to the Minister that these permits are reinstated to meet GSLM's timetable and work program objectives.

List of Attachments

- Attachment 1:** Map_ current area of Exploration Licence (EL) 14/2009 granted on 17 May 2010 (3,108 km²)
- Attachment 2:** Map_ The area of SEL 13/98 granted on September 2004 (15,035 km²)
- Attachment 3:** Letter_ from MRT to GSLM_ conditions that were agreed to between the Deputy Premier and GSLM_ 23/12/1998
- Attachment 4:** Report_ GSLM SEL 13/98 Final Report_ September 2009
- Attachment 5:** Letter_ MRT to GSLM_ Grant and issue of EL 14/2009_ 27/5/2010
- Attachment 6:** Report_ RPS Energy (CPR) Report_ 23/10/2008
- Attachment 7:** Letter_ WHK Document_ Application for oil & gas Licence_ 30/9/2009
- Attachment 8:** Press Release_ 28 day objection period closes, EL 14/2009 Issuance to follow without objection. 1st round of right issue closes_ Date 28/4/2010
- Attachment 9:** Map_2 Maps of ELA 14/2009 submitted by GSLM & Empire Energy_ exploration program & estimated expenditure Year 1-2_ Attachment of application for EL14/2009
- Attachment 10:** GSLM & Empire Energy_ exploration program & estimated expenditure Year 1-2_ Attachment of application for EL14/2009
- Attachment 11:** Letter_ from MRT to GSLM regarding to ELA 14/2009 application letter in central Tasmania_ Date 5/3/2010
- Attachment 12:** Letter_ from MRT to GSLM_SEL Application 13/2009 & ELA14/2009_ 22/12/2009
- Attachment 13:** Letter_ from GSLM to MRT_ Re-meeting between MRT & GSLM on 21/12/2009 & request for withdrawal SEL 13/2009_ Date 15/1/2010
- Attachment 14:** Letter_ from GSLM to MRT_ Re-urgent- Failure to deal with application EL 14/2009 No 2_ Date 12/3/2010 and email 2 March 2010
- Attachment 15:** Letter_ from MRT to GSLM_ELA 14/2009 possible licence area in 2 parts + maps_ Date 15/2/2010
- Attachment 16:** Email_ from GSLM to MRT_ request for A meeting- 22/2/2010
- Attachment 17:** Letter_ from MRT meeting requests were denied by MRT_ 26/2/2010
- Attachment 18:** Letter_ from GSLM letter to MRT_ Re Urgent- Failure to deal with application EL 14/2009 No 3_ Date 12/3/2010
- Attachment 19:** Letter_ from GSLM to MRT_ Re-Urgent- Failure to deal with application EL 14/2009 No 1_ Date 12/3/10
- Attachment 20:** Email_ from MRT to GSLM_ expenditure requirement_ 28/9/2009

Attachment 21: Email_ Bob Rutherford email to follow up on meeting on licence application_ 17/7/2009

Attachment 22: Letter_ from GSLM_ Minutes of meeting held on 21/12/2009 between GSLM and MRT

Letter_ from MRT SEL Application 13/2009 and ELA 14/2009, not accepting all points GSLM pointed_ 5/1/2010

Attachment 23: Report_ from GSLM_ Form 10-K Annual Report

Attachment 24: Fax_ from Bryan Green To GSLM_ Area of EL_ reply to letter 11/6/2004_ Date 2/7/2004

Attachment 25: Letter_ from GSLM_ Re Request for temporary withdrawal of SEL 13/2009_ Date 15/1/2010

Attachment 26: Letter_ from MRT_ SEL Application 13/2009 withdrawal of application 13/2009_ Date 25/1/2010

Attachment 27: Letter_ from Empire_ Re-Formal notification to reinstate SEL 13/2009_ Date 17/3/2010

Attachment 28: Letter_ from MRT_ SEL 13/2009 was withdrawn from the register and that the application is no longer pending_ 23/3/2010

Attachment 29: Letter_ From MRT Rental Rates Charged for EL14/2009 3,180 km² as per Invoice No. 008099_ Date 5/3/2010

Attachment 30: Photo of original GEFECO SpeedStar 185K Rig

Attachment 31: Email_ from Roman Leslie To Clive Burrett_ Tasmanian Basin stratigraphy questions_ 3/12/2009

Attachment 32: Press Release_ Minister Grants Petroleum Exploration Licence EL 14/2009_ 17/05/2010

Attachment 33: Letter_ Terrex Contract for exploration drilling and seismic program_ 25/9/2009

Attachment 34: Email_ from MRT_ Refer To 13(1) And (2) of The Act_ The application is pending from the date of its application for up to 12 Months_ 22/2/2010

Attachment 35: Report_ Due Diligence Report_ March 2010

Attachment 36: Letter_ From MRT_ Stated that three objections had been lodged to the granting of exploration licence application ELA 14/2009_ Date 21/04/2009

Attachment 37: Letter_ From Shields Heritage_ A letter showing MRT three objections were not valid.

