



Mr Ben Secrett
Senior Advisor
ASX Listing Compliance
ASX Compliance Pty Ltd

By Email

11 January 2017

Dear Mr Secrett

Appendix 3Y Change of Director's Interest Notice

We refer to your letter dated 10 January 2017 (copy attached) regarding the late lodgement of an Appendix 3Y and address the queries raised in your letter below:

Please explain why the Appendix 3Y was lodged late.

The delay in lodgement of the Appendix 3Y was a result of an internal administrative oversight. Due to the holiday period and calendar year projects being finalised this oversight occurred and the 3Y was lodged as soon as the oversight was identified. The 3Y disclosure does not relate to an on market trade and instead relates to the company's recently concluded Non-renounceable Entitlement Offer which was open to all shareholders and was taken up by the Director.

What arrangements does the Company have in place with its directors to ensure that it is able to meet its disclosure obligations under listing rule 3.19A?

Formal arrangements are in place with each Director to ensure compliance with ASX Listing Rule 3.19A. All directors must comply with ASX Listing Rule 3.19A and notify the company on any movement in their security holdings in the company.

If the current arrangements are inadequate or not being enforced, what additional steps does the Company intend to take to ensure compliance with listing rule 3.19B?

The company considers the current arrangements are adequate to ensure compliance with 3.19B, and that the late notice in this instance was a result of an administrative oversight.

Please let me know if you have any further queries.

Kind regards

[sent unsigned by email]

Gabriel Chiappini

Director



10 January 2017

Gabriel Chiappini
Eneabba Gas Limited
50 Ord Street
WEST PERTH WA 6005

By email

Dear Mr Chiappini

ENEABBA GAS LIMITED (THE "COMPANY")

We refer to the following.

1. The Company's announcement lodged with ASX Limited ("ASX") on 10 January 2017 regarding a Change of Director's Interest Notice for Mr Barnaby Egerton-Warburton ("Appendix 3Y").
2. ASX listing rule 3.19A which requires an entity to tell ASX the following.
 - 3.19A.2 *A change to a *notifiable interest of a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) including whether the change occurred during a *closed period where prior written clearance was required and, if so, whether prior written clearance was provided. The entity must complete Appendix 3Y and give it to ASX no more than 5 business days after the change occurs.*
 - 3.19B *An entity must make such arrangements as are necessary with a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) to ensure that the director discloses to the entity all the information required by the entity to give ASX completed Appendices 3X, 3Y and 3Z within the time period allowed by listing rule 3.19.A. The entity must enforce the arrangements with the director.*
3. Listing rule 3.19B which reads as follows.

An entity must make such arrangements as are necessary with a director of the entity (or in the case of a trust, a director of the responsible entity of the trust) to ensure that the director discloses to the entity all the information required by the entity to give ASX completed Appendices 3X, 3Y and 3Z within the time period allowed by listing rule 3.19.A. The entity must enforce the arrangements with the director.
4. The ASX Companies Update dated 27 June 2008, reminding listed entities of their obligation to notify ASX within 5 business days of the notifiable interests in securities held by each director and outlining the action that ASX would take in relation to breaches of listings rules 3.19A and 3.19B.

As the Appendix 3Y indicates a change in the notifiable interest held by Mr Egerton-Warburton occurred on 19 December 2016, the Appendix 3Y should have been lodged with the ASX no later than 28 December 2016.



As the Appendix 3Y was lodged on 10 January 2017, it appears that the Company may be in breach of listing rules 3.19A and/or 3.19B. It also appears the director concerned may have breached section 205G of the *Corporations Act 2001* (Cth).

Please note that ASX is required to record details of breaches of the listing rules by listed entities for its reporting requirements.

ASX reminds the Company of its contract with ASX to comply with the listing rules. In the circumstances, ASX considers that it is appropriate that the Company make necessary arrangements to ensure there is not a reoccurrence of a breach of the listing rules.

Having regard to listing rules 3.19A and 3.19B, and Guidance Note 22: "Director Disclosure of Interests and Transactions in Securities – Obligations of Listed Entities", ASX requires the Company to respond to each of the following questions.

1. Please explain why the Appendix 3Y was lodged late.
2. What arrangements does the Company have in place with its directors to ensure that it is able to meet its disclosure obligations under listing rule 3.19A?
3. If the current arrangements are inadequate or not being enforced, what additional steps does the Company intend to take to ensure compliance with listing rule 3.19B?

The Company's response should be sent by email to me at ben.secrett@asx.com.au – it should not be sent to the ASX Market Announcements Office.

The Company's response is required as soon as possible and, in any event, **by not later than 5.00pm AWST on Thursday, 12 January 2017**. Under listing rule 18.7A, a copy of this letter and the Company's response will be released to the market, so the Company's response should be in a form suitable for release and must separately address each of the questions asked.

Please contact me should you have any queries about this letter.

Yours sincerely

[sent electronically without signature]

Ben Secrett
Senior Adviser, ASX Listings Compliance