

27 August 2018

Ms Anjuli Sinniah  
Senior Adviser, Listings Compliance (Perth)  
ASX Compliance Pty Ltd  
Level 40, Central Park  
152-158 St Georges Terrace  
Perth WA 6000

By email: [anjuli.sinniah@asx.com.au](mailto:anjuli.sinniah@asx.com.au); [tradinghaltsp Perth@asx.com.au](mailto:tradinghaltsp Perth@asx.com.au)

Dear Anjuli,

**PRICE AND VOLUME QUERY**


I refer to your letter dated 27 August 2018 regarding the recent increase in the Company's share price and volume of shares traded.

In answer to your questions I advise as follows, using your numbering:

1. The Company is not aware of any information concerning it that has not been announced which, if known, could be an explanation for recent trading in the securities of the Company.
2. Not applicable.
3. The Company notes that there has been recent interest in the sector since the acquisition of AWE Limited ("AWE") by Mitsui. Key has undertaken a transaction in the Perth Basin with AWE Limited, prior to the Mitsui takeover, for the acquisition of AWE Perth Pty Ltd's 100% interest in Production Licence L7 which contains the Mount Horner Oil Field, as previously announced to ASX on 30 June 2017. As also previously announced on both 14 May 2018 and 30 July 2018, the Company believes the northern margin of the basin in both EP 437 and L7 is underexplored for conventional oil and has identified areas of further exploration drilling in both blocks as well as potential additional infill drilling locations in the Mount Horner Oil Field. In line with the Company's focus on conventional oil in the Perth Basin, the Company previously disclosed on 14 May 2018 that the Company had identified a potential Permian drilling candidate in the Dunsborough Field area of offshore WA 481-P that is analogous to the Waitsia Gas Field discovered by AWE. The Company is not aware of any other explanation for the recent trading in its securities.
4. The Company confirms that it is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. My responses to your questions have been authorised and approved in accordance with Key Petroleum's continuous disclosure policy and I have authority from the board to respond to ASX on disclosure matters.

If you have any queries, please do not hesitate to contact me.

Kind regards



**IAN GREGORY**  
Company Secretary  
**KEY PETROLEUM LIMITED**



27 August 2018

**Ian Gregory**

Company Secretary  
Suite 3, Churchill Court  
331-335 Hay Street  
SUBIACO WA 6008

By email: [iangregory@westnet.com.au](mailto:iangregory@westnet.com.au)

Dear Ian

**Key Petroleum Limited (the "Entity"): price and volume query**

We note the change in the price of KEY's securities from a close \$0.008 to an intraday high of \$0.013 at the time of writing today.

We also note the significant increase in the volume of KEY's securities traded today.

In light of this, ASX asks KEY to respond separately to each of the following questions and requests for information:

1. Is KEY aware of any information concerning it that has not been announced to the market which, if known by some in the market, could explain the recent trading in its securities?
2. If the answer to question 1 is "yes":
  - a) Is KEY relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?

Please note that the recent trading in KEY's securities would suggest to ASX that such information may have ceased to be confidential and therefore KEY may no longer be able to rely on Listing Rule 3.1A. Accordingly, if the answer to this question is "yes", you need to contact us immediately to discuss the situation.
  - b) Can an announcement be made immediately?

Please note, if the answer to this question is "no", you need to contact us immediately to discuss requesting a trading halt (see below).
  - c) If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?
3. If the answer to question 1 is "no", is there any other explanation that KEY may have for the recent trading in its securities?
4. Please confirm that KEY is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that KEY's responses to the questions above have been authorised and approved in accordance with its published continuous disclosure policy or otherwise by its board or an officer of KEY with delegated authority from the board to respond to ASX on disclosure matters.

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### When and where to send your response

This request is made under, and in accordance with, Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, by not later than **4.30pm WST today, 27 August 2018**. If we do not have your response by then, ASX will have no choice but to consider suspending trading in KEY's securities under Listing Rule 17.3.

You should note that if the information requested by this letter is information required to be given to ASX under Listing Rule 3.1 and it does not fall within the exceptions mentioned in Listing Rule 3.1A, KEY's obligation is to disclose the information "immediately". This may require the information to be disclosed before the deadline set out in the previous paragraph.

ASX reserves the right to release a copy of this letter and your response on the ASX Market Announcements Platform under Listing Rule 18.7A. Accordingly, your response should be in a form suitable for release to the market.

Your response should be sent to me by e-mail at [anjuli.sinniah@asx.com.au](mailto:anjuli.sinniah@asx.com.au) and [tradinghaltspert@asx.com.au](mailto:tradinghaltspert@asx.com.au). It should not be sent directly to the ASX Market Announcements Office. This is to allow me to review your response to confirm that it is in a form appropriate for release to the market, before it is published on the ASX Market Announcements Platform.

### Listing Rules 3.1 and 3.1A

Listing Rule 3.1 requires a listed entity to give ASX immediately any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity's securities. Exceptions to this requirement are set out in Listing Rule 3.1A.

In responding to this letter, you should have regard to KEY's obligations under Listing Rules 3.1 and 3.1A and also to Guidance Note 8 *Continuous Disclosure: Listing Rules 3.1 – 3.1B*.

It should be noted that KEY's obligation to disclose information under Listing Rule 3.1 is not confined to, nor is it necessarily satisfied by, answering the questions set out in this letter.

### Trading halt

If you are unable to respond to this letter by the time specified above, or if the answer to question 1 is "yes" and an announcement cannot be made immediately, you should discuss with us whether it is appropriate to request a trading halt in KEY's securities under Listing Rule 17.1.

If you wish to request a trading halt, you must tell us:

- the reasons for the trading halt;
- how long you want the trading halt to last;
- the event you expect to happen that will end the trading halt;
- that you are not aware of any reason why the trading halt should not be granted; and
- any other information necessary to inform the market about the trading halt, or that we ask for.

We require the request for a trading halt to be in writing. The trading halt cannot extend past the commencement of normal trading on the second day after the day on which it is granted.

You can find further information about trading halts in Guidance Note 16 *Trading Halts & Voluntary Suspensions*.

If you have any queries or concerns about any of the above, please contact me immediately.

Kind regards

*[Sent electronically without signature]*

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**Anjuli Sinniah**

Senior Adviser, Listings Compliance (Perth)