

8 March 2019

Jon Chow
Adviser, Listings Compliance (Melbourne)
Level 4 North Tower Rialto
525 Collins Street
Melbourne VIC 3000

Dear Jon

IPB Petroleum Limited ('IPB'): Price Query

With reference to your letter of 7 March (enclosed) and adopting the same numbering IPB provides the following responses:

1.0 No

2.0 Not applicable

3.0 We make reference to the following observations:

3.1 In our December 2018 Quarterly Activities Report (lodged 31 January, 2019), and with particular reference to our proposed Extended Well Test Study (Idris Prospect, Gwydion oil field) detailed within, IPB made the following statement "IPB is working with vendors and financiers to develop a financing strategy to fund the project without which the project cannot proceed. However, with a substantial profit on offer the Company is hopeful of being able to conclude a financing strategy to take the project from a study phase through to commitment and commencement..."

The Company is continuing to progress this project, however at this stage there is nothing that IPB is able to announce under ASX Listing Rules and taking into account ASX's recent published guidance on "Disclosures by Oil and Gas entities" as progress remains at an inconclusive stage.

3.2 In August last year IPB was queried about a price rise of a similar scale. At the time, in its response the company referred to the drilling success at the Dorado discovery in a basin to the south of IPB's permits, following which IPB's price subsequently rose within a week to 10 cents per share. IPB notes that Santos and Carnarvon Petroleum are again due to commence drilling at this same location in the coming month.

4.0 IPB is compliant with Listing Rule 3.1

5.0 This disclosure has been authorised by a director and officer of the company with the authority to respond to ASX on these disclosure matters.

Kind regards,

A handwritten signature in black ink that reads "B. Brown." The signature is written in a cursive style with a period at the end.

Brendan Brown
Managing Director



7 March 2019

Mr Martin Warwick
Company Secretary
IPB Petroleum Limited

By email: mwarwick@ipbpet.com.au

Dear Mr Warwick

IPB Petroleum Limited ('IPB'): Price Query

We note the change in the price of IPB's securities from a low of \$0.022 on 25 February 2019 to an intra-day high of \$0.049 today, 7 March 2019.

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

Request for Information

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

1. Is IPB 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 IPB relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in IPB's securities would suggest to ASX that such information may have ceased to be confidential and therefore IPB 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 IPB may have for the recent trading in its securities?
4. Please confirm that IPB is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that IPB's responses to the questions above have been authorised and approved under its published continuous disclosure policy or otherwise by its board or an officer of IPB with delegated authority from the board to respond to ASX on disclosure matters.

When and where to send your response

This request is made under Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, by no later than **9.30 AM AEDT Friday, 8 March 2019**. If we do not have your response by then, ASX will likely suspend trading in IPB'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, IPB'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 ListingsComplianceMelbourne@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 IPB’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 IPB’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 IPB’s securities under Listing Rule 17.1. If you wish 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 may 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*.

Suspension

If you are unable to respond to this letter by the time specified above ASX will likely suspend trading in IPB’s securities under Listing Rule 17.3.

Enquiries

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

Kind regards

Jon Chow

Adviser, Listings Compliance (Melbourne)