



Australian Office
A.B.N 29 002 148 361
Level 7, 151 Macquarie Street
Sydney NSW 2000 Australia
T: +61 2 9251 1846
F: +61 2 9251 0244

6 November 2017

ASX Compliance Pty Limited
20 Bridge Street
Sydney NSW 2000

Attention: Andrew Kabega

Dear Andrew

RE: ASX PRICE QUERY

With reference to your correspondence dated 6 November 2017 concerning an increase in the trading price of the Company's securities and an increase in the volume of trading since the opening of the market on Monday 6 November 2017 please note that the change in price of Empire Energy Group Limited ('Empire') securities was from an opening of 1.1 cents to a closing high of 1.5 cents generating a VWAP of 1.2698 cents. We respond to your questions as follows:

1. The Company is not aware of any information concerning it which if known could be an explanation for recent trading in the Company's securities.
2. Not applicable.
3. As announced in the Company's recent quarterly activities report continuing management focus is being directed to the acquisition of oil assets and bolt-on opportunities in the USA. Two potential acquisitions are under consideration. In addition, the Company's wholly owned subsidiary Imperial Oil & Gas Pty Ltd holds exploration permits in the Northern Territory which will be impacted by the pending fracking decision to be made in the short term by the Northern Territory Government. The Company is not aware of any explanation for the recent trading in securities.
4. The Company confirms that it is in compliance with the Listing Rules and in particular Listing Rule 3.1.
5. Empire's responses to the questions above have been authorised and approved in accordance with the Company's published continuous disclosure policy or otherwise by its board or an officer of Empire with delegated authority from the board to respond to the ASX on disclosure matters.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'R Ryan', is written over a horizontal line.

R Ryan
Secretary



6 November 2017

Ms Rachel Ryan
Company Secretary
Empire Energy Group Limited
Level 7, 151 Macquarie Street
Sydney NSW 2000

By email: rryan@empiregp.net

Dear Ms Ryan

Empire Energy Group Limited ("Empire"): price query

We note the change in the price of Empire's securities from a low of 1.1 cents to a high of 1.5 cents today on Monday, 6 November 2017.

We also note the significant increase in the volume of Empire's securities traded today Monday, 6 November 2017.

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

1. Is Empire 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 Empire relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?

Please note that the recent trading in Empire's securities would suggest to ASX that such information may have ceased to be confidential and therefore Empire 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 Empire may have for the recent trading in its securities?
4. Please confirm that Empire is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.

5. Please confirm that Empire'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 Empire 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, 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 half an hour before the start of trading (i.e. before 9.30 am AEDT on Tuesday, 7 November 2017. If we do not have your response by then, ASX will have no choice but to consider suspending trading in Empire'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, Empire'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 Andrew.kabega@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 Empire'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 Empire'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 Empire'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*.

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

Yours sincerely

[Sent electronically without signature]

Andrew Kabega
Senior Adviser, Listings Compliance (Sydney)