



6 December 2016

Mr Ben Secrett
Senior Adviser, Listings Compliance (Perth)
ASX Compliance Pty Ltd
Level 40 Central Park
152 – 158 St Georges Terrace
PERTH WA 6000

By email: ben.secrett@asx.com.au and tradinghaltsperth@asx.com.au

Dear Ben

RE: PRICE AND VOLUME QUERY

We refer to your letter dated 6 December 2016 and comment as follows:

1. The Company is not aware of any information concerning it that has not been announced, which could be an explanation for recent trading in the securities of the Company.
2. Not applicable.
3. The Company is not able to offer any other explanation for the recent trading in its securities.
4. We confirm that the Company is in compliance with the Listing Rules and, in particular, Listing Rule 3.1.
5. The Company's responses set out in this letter have been authorised and approved by the Board of the Company in accordance with the Company's published continuous disclosure policy.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'R. Downey', with a long horizontal flourish extending to the right.

Robert Downey
Director

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6 December 2016

Mr Neil Hackett
Azonto Petroleum Limited
Suite 5, 531 Hay Street
SUBIACO WA 6008

By email

Dear Mr Hackett

AZONTO PETROLEUM LIMITED (“APY”): ASX PRICE AND VOLUME QUERY

We note the change in the price of APY’s securities from a closing price of \$0.008 on Monday, 5 December 2016 to an intra-day high of \$0.012 at the time of writing today, Tuesday, 6 December 2016.

We also note a significant increase in the volume of APY’s securities traded today.

In light of this, ASX asks APY to answer separately each of the following questions and provide the following confirmations in a format suitable for release to the market in accordance with Listing Rule 18.7A:

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

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

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5. Please confirm that APY'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 APY 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 11.15am AWST today, Tuesday, 6 December 2016**. If we do not have your response by then, ASX will have no choice but to consider suspending trading in APY'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, APY'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 tradinghaltperth@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 APY'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 APY'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 APY'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]

Ben Secrett
Senior Adviser, ASX Listings Compliance (Perth)

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