

KIPPER TUNA TURRUM PROJECT

SUMMARY ENVIRONMENT PLAN FOR MARLIN B HOOK-UP AND NON-PROCESS HYDROCARBONS COMMISSIONING

INTRODUCTION

As part of the Kipper Tuna Turrum (KTT) Project, Esso Australia Pty Ltd (Esso) is proposing to undertake hook-up and non-process hydrocarbons commissioning activities on the Marlin B platform located in the Commonwealth waters of Licence Area VIC/L03 within the Gippsland Basin of Eastern Bass Strait. McDermott Australia Pty Ltd (McDermott) is the primary contractor for the KTT Project.

An Environment Plan (EP) for the hook-up and non-process hydrocarbons commissioning activities and associated transport and logistics has been prepared in accordance with the requirements of the *Offshore Petroleum & Greenhouse Gas Storage (Environment) (OPGGS(E)) Regulations 2009*. The EP has been reviewed and accepted by the National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA).

This EP summary document has been prepared to comply with the requirements of Regulation 11(7) and (8) of the OPGGS(E) Regulations.

LOCATION OF ACTIVITY

As illustrated in Figure 1, Licence Area VIC/L03 is located within the Gippsland Basin of Eastern Bass Strait. Marlin B platform, shown in Figure 2, is situated in 60 metres of water approximately 45 kilometres southeast of the township of Lakes Entrance on the Victorian coast. The coordinates of Marlin B platform are provided in Table 1.

Table 1 - Marlin B platform location

Location point	Coordinate	
	Latitude	Longitude
Marlin B platform Datum: GDA 94 Zone 55	38° 13' 46" South	148° 13' 16" East

Figure 1 – Location of Esso Production Licences in Bass Strait

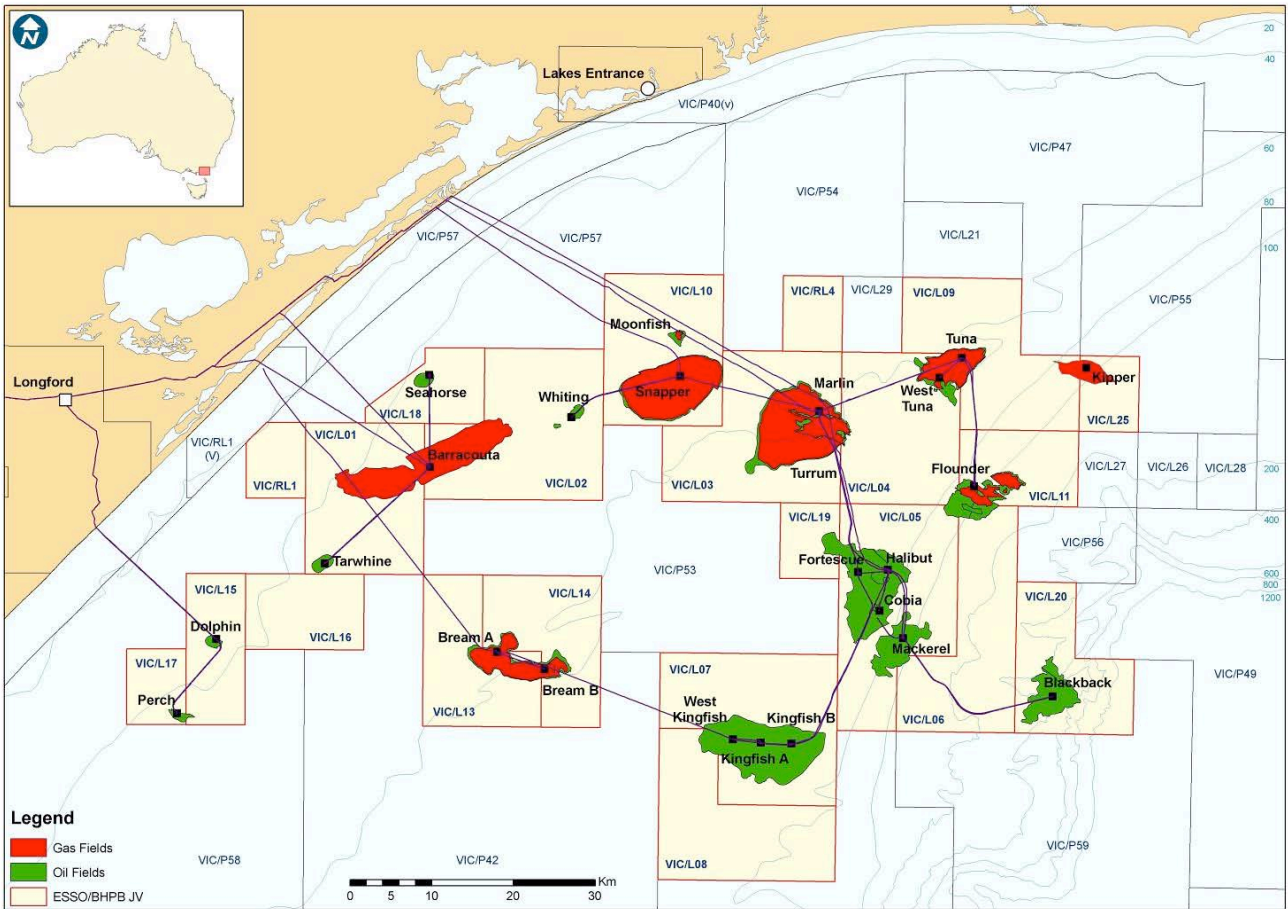


Figure 2 – Marlin B platform in foreground (existing Marlin A platform in the background)

DESCRIPTION OF ACTIVITY

Following the installation of all modules on the Marlin B platform, hook up and non-process hydrocarbons commissioning activities will commence.

Hook-up and non-process hydrocarbons commissioning can be divided into two distinct phases:

1. Hook-up of mechanical and electrical systems.
2. Commissioning of non-process hydrocarbon systems.

Prior to commencement, McDermott will install, and make operational, temporary safety systems required to ensure safety of personnel working on the modules. Temporary utilities will also be provided including diesel, potable water and compressed air.

Hook-Up Activities

The hook-up phase is the physical installation of small piping spools, steel plate and electrical cables that inter-connect between each of the Marlin B modules and the re-installation of machinery that was moved or stored for transportation purposes.

Activities include:

- Piping systems:
 - Cutting of pipe.
 - Grinding.
 - Welding.
 - Passivation.
 - Electropolishing.
 - Boroscope inspection and non-destructive examination (radiographic testing and ultrasonic testing).
- Structural systems:
 - Installation and weldout of deck plates, hand rails, stairways, structural supports etc.
- Mechanical systems:
 - Installation of pumps and other static equipment.
- Electrical & Instrumentation systems:
 - Uncoiling, pulling, connecting cables.
 - Installing ends of cables (terminating).

Non-process Hydrocarbons Commissioning Activities

The following (non-process hydrocarbons) utility systems undergo commissioning in this phase:

- Instrument/service air.
- Firewater system (deluge and sprinkler).
- Foam deluge.
- Heating, ventilation and air conditioning (HVAC) systems.
- Diesel supply system.
- Potable water supply system.
- Power generation from the turbine generators (running on diesel).

The following safety systems undergo commissioning in this phase:

- Navigational aids.
- Bruckers and their winches / lowering mechanisms.
- Fire and gas detection.
- Alarms.
- Platform public address and other communications systems.

Specific activities include:

- Piping systems:
 - Nitrogen-Helium testing of process piping systems to ensure flange joint integrity has been achieved.
 - Service testing of the firewater system.
- Electrical and Instrumentation systems:
 - Functional checks on electrical units.
 - Operation of electrical motors.
 - Commissioning electrical systems such as lighting and heat tracing circuits.

During the proposed activities, the accommodation and service vessel (ASV) Edda Fides, shown in Figure 3, will hold position adjacent to the Marlin B platform and connect to the installation via a specially designed heave-compensated telescopic walkway fitted at the vessel bow.

The Edda Fides is a dynamically positioned, 600 berth ASV, built in 2011 and owned by Edda Accommodation, part of the Norwegian Ostensjo Group.

At least one support vessel will be maintained for supply runs to and from McDermott's onshore supply base at the Port of Melbourne. Personnel changes will be conducted via helicopter from West Sale to the Edda Fides.

It is expected that the Marlin B hook up and non-process hydrocarbons commissioning activity will commence in 2Q 2012 and continue for approximately seven months.



Figure 3 – Edda Fides

DESCRIPTION OF THE RECEIVING ENVIRONMENT

Physical Environment

Bass Strait is the region of the continental shelf that separates mainland Australia from Tasmania.

Climate and Meteorology

Wind speeds in Bass Strait are typically in the range of 10 km per hour to 30 km per hour, with maximum gusts reaching 100 km per hour. The wind direction in central Bass Strait is predominantly westerly during winter, westerly and easterly during spring and autumn (when wind speeds are highest) and easterly during summer.

Average summer air temperatures in coastal Victoria range from early morning lows of 12°C to 15°C, to afternoon highs of 23°C to 26°C (BOM 2009). Average winter temperatures range from minimums of 4°C to maximums of 15°C in the afternoons.

Average annual rainfall along the coast ranges from approximately 500 mm to greater than 1,000 mm. Offshore (on Deal Island in central Bass Strait) annual rainfall is comparable (average 714 mm) and shows a similar pattern to the coastal region (Lakes Entrance) with slightly higher winter rainfall.

Bathymetry, Geology and Sedimentation

The bathymetry of Bass Strait is concave-shaped, with a shallower rim on the eastern and western entrances to the strait and a deeper centre. A steep inshore profile extends to a less steep and moderate profile concluding with a flat outer shelf plain.

The seabed of Bass Strait is characterised by a variety of sediment types that are associated with tidal currents, with sediment grain size linked to wave energy. Sediments become progressively finer with distance from the shore. Offshore at approximately 35 m to 40 m depth an irregular bed colonised by marine growth occurs. Finer, muddy sands occur further offshore in the mid-shelf regions.

The seabed in the project area is essentially flat with gently sloping bathymetry and water depths ranging from 60 m to 110 m in the immediate vicinity of the Kipper, Tuna and Turrum fields. The seabed is predominantly calcium carbonate comprised of calcarenite marls and marine shales and sedimentation is likely to be low reflecting low river outflow into the area.

Oceanography

Currents in eastern Bass Strait are tide and wind-driven. Tidal movements in eastern Bass Strait predominantly have a northeast–southwest orientation.

Tidal flows in Bass Strait come from the east and west during a rising (flood) tide, and flow out to the east and west during a falling (ebb) tide. The main tidal components in Bass Strait vary in phase by about three to four hours from east to west.

Temperatures in the subsurface waters of central Bass Strait range from about 13°C in August / September to 16°C in February / March. Surface temperatures in eastern Bass Strait can exceed 20°C at times in late summer.

Bass Strait is a high energy environment exposed to frequent storms and significant wave heights, with highest wave conditions generally associated with strong west to southwest winds. Storms may occur several times a month resulting in wave heights of 3 m to 4 m or more. In severe cases, southwest storms can result in significant wave heights of greater than 6 m.

Biological Environment

Bass Strait contains high faunal diversity and species endemism. Possible causes for this high endemism include the long period of isolation in geological time and climatic barriers; a history of variable exposure and immersion during sea-level changes in the last few million years; the influence of water masses from the west, northeast and south; and the complexity and high biogenic component of the sediment.

Plankton

Phytoplankton biomass is greatest at the extremities of Bass Strait (particularly in the northeast) where water is shallow and nutrients are high. More than 170 species of zooplankton have been recorded in eastern and central Bass Strait, with copepods making up approximately half of the species encountered (Watson & Chaloupka, 1982).

Benthic Communities

Benthic communities in Bass Strait are varied and are principally determined by the seafloor habitat. The Museum of Victoria conducted an extensive survey of benthic invertebrates in Bass Strait from 1979 to 1983 (Poore et al., 1985; Wilson & Poore, 1987). In general, a highly diverse array of invertebrate groups was found, with several polychaete families, pycnogonids, pericardid crustaceans, opisthobranch molluscs, bryozoans and brachiopods being the most species rich. The main findings included:

- High diversity of invertebrate groups in Bass Strait when compared to equivalent areas of the northern hemisphere.
- Many species are widely distributed across Bass Strait, suggesting heterogenous sediments and many microhabitats.
- Crustaceans and polychaetes dominate the infaunal communities, many of which are unknown species.

As the seafloor of the Gippsland Basin is predominately sandy, macroalgal communities are not common on subtidal reefs in east Gippsland possibly due to degree of exposure, poor light levels and abrasion by moving sand.

Fish

It is estimated that there are over 500 species of fish found in the waters of Bass Strait, including a number of species of importance to commercial and recreational fisheries (LCC, 1993). Fish species that may occur in the project area that are listed as threatened under the *Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act)* include the orange roughy (*Hoplostethus atlanticus*) and eastern gemfish (*Rexea solandri*).

Sharks and Rays

A large number of chondrichthyans (sharks and rays) occur in Bass Strait. Shark species that may occur in the project area that are listed as threatened under the EPBC Act include the great white shark (*Carcharodon carcharias*), the grey nurse shark (*Carcharias taurus*) and the whale shark (*Rhincodon typus*).

Reptiles

There are five marine reptiles that occur as migrants along the eastern shores of Bass Strait. These include the loggerhead turtle (*Caretta caretta*), green turtle (*Chelonia mydas*), pacific ridley (*Lepidochelys olivacea*), leathery turtle (*Dermochelys coriacea*) and the yellow-bellied sea snake (*Pelamis platurus*) (G. Gillespie pers. comm. cited in Plummer et al., 2003).

Birds

Bass Strait islands are nesting sites for many seabird species, many of which migrate to these islands each year. Colonies of seabirds occur to the west of the project area in Corner Inlet and on the islands around Wilsons Promontory, and to the east at the Skerries, Tullaberga Island and Gabo Island (Harris & Norman, 1981). Species that nest and breed on these islands include the little penguin (*Eudyptula minor*), white-faced storm petrel (*Pelagodroma marina*), short-tailed shearwater (*Puffinus tenuirostris*), fairy prion (*Pachyptila turtur*), common diving petrel (*Pelecanoides urinatrix*), black-faced cormorants (*Phalacrocorax fuscescens*) and the pacific gull (*Larus pacificus*).

Fifty-eight bird species listed under the EPBC Act may occur, or are likely to occur, within the Gippsland Basin and coastal fringe areas. Many of these species, some of which may be protected by international agreements, may periodically pass through Bass Strait on their way to or from the islands in Bass Strait and the mainlands of Victoria and Tasmania.

Seals

Two Otariid seal species, the Australian fur seal (*Arctocephalus pusillus doriferus*) and the New Zealand fur seal (*A. forsteri*) have breeding colonies in Bass Strait. Both species are listed under the EPBC Act.

Cetaceans

Twenty seven cetacean species have been recorded in eastern Bass Strait (DEWHA, 2009), with the blue whale, southern right whale, humpback whale, sperm whale, bottle-nosed dolphin and common dolphin most commonly recorded. The blue whale, southern right whale and humpback whale are listed as threatened under the EPBC Act.

Introduced Marine Pests

Marine pests have been introduced to Australia by a variety of human and natural means including ballast water, biofouling, aquaculture operations and aquarium imports. The New Zealand screw shell (*Maoricolpus roseus*) which forms extensive and dense beds on the sandy seafloor is one exotic marine species known to have been introduced to Bass Strait.

Areas of Conservation Significance

The closest Marine Protected Area to the project area is Beware Reef Marine Sanctuary, located approximately 5 km southeast of Cape Conran. Beware Reef Marine Sanctuary is located approximately 65 km northeast of the Marlin B platform.

Socio-Economic Environment

Commercial Fisheries

Most fishing vessels operating in eastern Bass Strait operate from Lakes Entrance, where one of Australia's largest fishing fleets is harboured. The fleet targets a wide range of species of fish and shark along with scallops, prawns and crayfish for the local, national and international markets.

Of the commercial fisheries within Bass Strait, the otter trawlers and Danish seiners of the southeast trawl sector are most likely to be encountered in the vicinity of the project area. These mainly target the quota species that inhabit the shallower areas of the continental shelf, such as flathead, whiting, morwong and others.

Commercial Shipping

Bass Strait is one of Australia's busiest shipping areas with more than 3,000 vessels passing through Bass Strait each year. The KTT Project area is approximately 20 km from the main shipping lane and a shipping exclusion zone is in place for the oil and gas infrastructure in eastern Bass Strait.

Recreational Fishing, Boating and Tourism

The Gippsland region is a popular tourist destination. Tourism and recreational activities offered by the region include sailing, swimming, fishing, diving and bird watching.

Recreational fishing is a common activity in the nearshore area along Ninety Mile Beach, comprising both beach-based fishing and boat-based fishing.

A number of sites, such as Beware Reef, are popular locations for recreational divers as there are numerous shipwrecks.

Oil & Gas Infrastructure

The Gippsland Basin is a major petroleum province, producing oil and gas of significant economic benefit for approximately 40 years. Esso's offshore facilities in the Gippsland Basin include 21 offshore platforms and installations and a network of 600 km of pipelines.

MAJOR ENVIRONMENTAL HAZARDS AND CONTROLS

An environmental risk assessment was undertaken to identify and manage the environmental risks associated with the Marlin B hook-up and non-process hydrocarbons commissioning activities.

The key sources of environmental risks for the proposed activities identified include:

- Accidental release of non-process hydrocarbons and hazardous chemicals to the marine environment.
- Routine discharge of food scraps, sewage and greywater to the marine environment.
- Routine discharge of deck drainage and machinery/equipment space effluent to the marine environment.
- Emissions to atmosphere.
- Discharge of ballast water and vessel biological fouling.
- Light and noise emissions.
- Interactions with commercial fishing and shipping activities.

The potential environmental impacts associated with the above sources of environmental risk include:

- Disturbance to marine fauna.
- Disturbance to marine habitats.
- Reduced air quality from emissions to atmosphere.
- Introduction of invasive marine species as a result of ballast water discharge and vessel biological fouling.
- Marine pollution from routine discharges including sewage, food scraps and bilge water.
- Marine pollution from accidental releases of non-process hydrocarbons and hazardous chemicals.
- Interference with commercial shipping and fishing activities.

Key environmental aspects and control/management measures to prevent or reduce impacts to a level which is as low as reasonably practicable (ALARP) are summarised in Table 2. All risks were ranked as Category 4 within the Esso Risk Matrix. This represents a lower risk that is expected to be effectively managed by the practices and controls in place.

Table 2 – Summary of Environmental Aspects, Impacts and Control Measures

Aspects	Possible Impacts	Control/Mitigation Measures
Storage and use of chemicals and radioactive materials	<p>Potential for promotion of acute or chronic pathology or mortality of marine organisms.</p> <p>Temporary changes to water column biochemistry.</p>	<p>Material Safety Data Sheets for all chemicals will be available to personnel onboard</p> <p>An inventory of all hazardous materials onboard will be maintained.</p> <p>The volume of chemicals stored onboard will be kept to the minimum practicable.</p> <p>Where practicable, lower toxicity chemicals will be selected for use.</p> <p>Hazardous chemicals will be securely stored in appropriately bunded and enclosed or covered storage facilities.</p> <p>Designated chemical storage areas will be located where the likelihood of any release or spill into the sea is minimised.</p> <p>Regular inspection of storage facilities will be conducted.</p> <p>Spill response equipment will be maintained in constant readiness at all times.</p> <p>The application of coatings such as paint and PFP will be conducted within purpose built contained habitats to prevent release to the environment.</p> <p>The radioactive source will be managed in accordance with a Radiation Management Plan prepared by the licensed non-destructive testing sub-contractor.</p>
Discharge of sanitary wastes	<p>Temporary reduction in water quality through introduction of nutrients</p> <p>Visual amenity impacts</p>	<p>Sewage treated in accordance to MARPOL Annex IV requirements.</p> <p>Grey water directed to ASV sewage treatment system.</p> <p>Equipment on preventative/planned maintenance system.</p> <p>Biodegradable cleaning products used.</p> <p>Rapid dispersion in high energy Bass Strait environment.</p> <p>Discharge location not in proximity to land (i.e. >12Nm)</p>
Discharge of food scraps	<p>Temporary reduction in water quality through introduction of nutrients</p> <p>Ingestion by marine organisms resulting in morbidity and mortality of marine organisms.</p> <p>Visual amenity impacts</p>	<p>Food scraps macerated to less than 25mm particle size in accordance to MARPOL Annex V.</p> <p>Equipment on preventative/planned maintenance system.</p> <p>Rapid dispersion in high energy Bass Strait environment.</p> <p>Discharge location not in proximity to land (i.e. >12Nm)</p>
Hazardous and general waste management	<p>Ingestion of waste materials resulting in morbidity and mortality of marine fauna.</p> <p>Temporary alteration of biochemical parameters of water column.</p> <p>Visual amenity impacts</p>	<p>Identification of waste reduction measures to prevent waste generation.</p> <p>Waste segregation, containment (in skips or sealed drums) and labelling.</p> <p>No hazardous or general waste disposed overboard.</p> <p>Waste storage areas are regularly inspected.</p> <p>Training and reinforcement of waste handling requirements for all personnel.</p> <p>Licensed waste disposal contractors used onshore.</p>
Emissions to atmosphere	<p>Detrimental impacts resulting from release of greenhouse gases e.g. CO₂, and atmospheric pollutants e.g. CO, NO_x and SO_x.</p>	<p>All emissions from marine utilities in accordance with MARPOL Annex VI.</p> <p>ASV complies with DNV CLEAN DESIGN classification and monitors fuel consumption in accordance with Fuel Management Plan.</p> <p>Equipment on preventative/planned maintenance system to ensure maximum efficiencies.</p> <p>Highly dispersive offshore environment.</p>

Table 2 – Environmental Risk Assessment Summary (Continued)

Aspects	Possible Impacts	Control/Mitigation Measures
Discharge of deck drainage	<p>Potential for promotion of acute or chronic pathology or mortality of marine organisms.</p> <p>Temporary changes to water column biochemistry.</p>	<p>Contamination of deck drainage is minimised by ensuring that all fuels, oils and chemicals onboard are stored in appropriate containment facilities with bunding as required. Drip trays installed under valves and hose connections to the extent that is practicable.</p> <p>High standards of housekeeping are maintained. Daily inspections ensure that deck areas are clean of spillages and accumulations of oil/grease and chemicals.</p> <p>Absorbents readily available for small deck spillages.</p> <p>Biodegradable detergents selected for wash-down.</p> <p>On vessels, deck drainage from bunded areas or designated containment areas is processed via the vessel's slops system (see aspect below).</p> <p>Marlin B deck drainage from bunded areas or designated containment areas is collected in the skimmer piles (for future treatment in the process system) and will not be discharged during hook up and pre-commissioning.</p> <p>Rapid dispersion in high energy Bass Strait environment.</p>
Discharge of effluent from machinery/equipment spaces	<p>Potential for promotion of acute or chronic pathology or mortality of marine organisms.</p> <p>Temporary changes to water column biochemistry.</p>	<p>Oily water separator treats to oil in water content < 15ppm prior to discharge (MARPOL Annex I), ASV treats to < 5ppm prior to discharge.</p> <p>Oily water discharged via an approved oil in water meter as per MARPOL Annex I with alarm and shutdown/divert on board excursion.</p> <p>Oil in water monitor routinely calibrated.</p> <p>Equipment on preventative/planned maintenance system.</p> <p>Discharge recorded in Oil Record Log.</p> <p>Rapid dispersion in high energy Bass Strait environment.</p>
Discharge of ballast water and biofouling	<p>Translocation of non-endemic aquatic or terrestrial species that may out-compete endemic species and colonise niches within the local environment</p>	<p>Support vessels, except ASV, have been operating in Bass Strait since 2010.</p> <p>Adherence to AQIS requirements, ASV required to exchange at sea 'high risk' ballast water.</p> <p>No discharge of ballast water while ASV positioned alongside Marlin B platform.</p> <p>All vessels are coated with compliant anti-fouling paints in accordance with <i>Protection of the Sea (Harmful Antifouling Systems) Act 2006</i>.</p>
Discharge from foam deluge system commissioning	<p>Potential for promotion of acute or chronic pathology or mortality of marine organisms.</p> <p>Temporary changes to water column biochemistry.</p>	<p>Foam application areas are bunded to minimise release into the marine environment.</p> <p>Aqueous film-forming foam (AFFF) has low toxicity to aquatic organisms and is not classified as hazardous to the aquatic environment.</p> <p>Rapid dispersion in high energy Bass Strait environment.</p>
Lighting	<p>Interference with behaviour of marine fauna and birds</p>	<p>Only sufficient lighting will be provided on vessels in order to conduct operations safely.</p> <p>Location remote from seabird or turtle nesting areas.</p>
Noise emissions	<p>Disturbance of and/or behavioural changes by noise sensitive fauna e.g. cetaceans</p>	<p>No known feeding/breeding or aggregation grounds in close proximity.</p> <p>Species will avoid area if noise disturbance too high.</p> <p>Adherence to Part 8 of the EPBC Regulations (interacting with cetaceans).</p> <p>Cetacean sightings recorded.</p> <p>Personnel induction to assist in cetacean identification.</p>
Disturbance to seabed from anchoring	<p>Physical disturbance to seabed resulting in temporary loss of benthic habitat.</p> <p>Smothering and disturbance of sessile marine species.</p> <p>Temporary localised increase in turbidity.</p>	<p>ASV and support vessels operate on dynamic positioning.</p> <p>Anchoring only in an emergency situation.</p>

Table 2 – Environmental Risk Assessment Summary (Continued)

Aspects	Possible Impacts	Control/Mitigation Measures
Physical presence of vessels	Interference with commercial fishing or shipping activities. Encroachment on fishing grounds.	Activities within 'Area to be Avoided'. 24 hour radar watch and radio communication with coastal shipping. Activities within existing Petroleum Safety Zone. Continued consultation with fishing industry groups. Notification of ASV mobilisation.
Diesel fuel spill (transfer of day tank)	Potential for promotion of acute or chronic pathology or mortality of marine organisms. Temporary changes to water column biochemistry.	Double skinned fuel tank. Use of licensed crane operator, riggers and dogmen. Certified cranaage and rigging. Day tank double slinged. Maintenance schedule for cranaage and rigging. Equipment visually inspected before each lift. Adherence to operational weather limitations. Use of experienced and qualified marine crew. Availability of implemented and tested SOPEP.
Diesel fuel spill (bunkering)		High level alarm overfill protection devices fitted to fuel tanks. Fuel bunkering stations fitted with spill trays. Fuel oil overflow system directs ventilation pipes to separate fuel oil over flow tank with alarm. Ventilation and overflow pipes fitted with spill trays. Hose couplings are dry break. Transfers will only occur during favourable weather conditions and daylight hours in accordance with bunkering operations procedures. Responsible person located at loading manifold to observe transfer and shutdown if needed. Hoses visually inspected before each transfer. Availability of implemented and tested SOPEP. Availability of implemented and exercised OSCP.
Diesel fuel spill (vessel collision/grounding)		Adherence to SIMOPS (simultaneous operations) protocols. Adherence to AIS/Radar/VHF/Watch keeping procedures. Marine Safety Information warnings per AUSREP will be adhered to. Flares and ALDIS lamp as per SOLAS. Navigational aids including light and foghorns Vessel ability to change heading or move off on DP. ASV is a DP3 vessel (triple redundancy). ASV CLEAN DESIGN fuel tanks are not situated with boundaries against the sea. Support vessel diesel storage in compartmentalised / multiple independent storage tanks within the hull. Vessel crew training and regular drills/exercises. Availability of implemented and tested SOPEP. Availability of implemented and exercised OSCP.

MANAGEMENT APPROACH

The Marlin B hook-up and non-process hydrocarbons commissioning activities will be conducted under the framework of Esso's OIMS (Operations Integrity Management System), McDermott's HSE Management System (HSEMS) and Edda Accommodation's Integrated Management System (IMS).

Under this framework, possible environmental impacts associated with the proposed activities are identified and assessed, and management controls to eliminate or reduce environmental risk are implemented. Documented plans and procedures are used to ensure that environmental risks due to the activities are reduced to ALARP. Project specific documents including an Environmental Management Plan and a Waste Management Plan have also been developed by McDermott, and approved by Esso.

Esso is responsible for ensuring that the proposed activities are managed in accordance with the accepted EP. All contractors undertaking activities on Esso's behalf will implement, and comply with, all environmental constraints and controls nominated in the accepted EP.

Specific responsibilities identified with respect to environmental management arrangements are assigned in the accepted EP's implementation strategy.

Environmental performance objectives are defined and these objectives are monitored and reviewed to verify that required environmental outcomes are achieved during hook-up and non-process hydrocarbons commissioning.

Esso is committed to the principle of continuous improvement and the results of performance reviews, audits and inspections and incident investigations are documented and incorporated as improvement actions for future activities.

STAKEHOLDER CONSULTATION

Esso Australia Pty Ltd maintains an active stakeholder consultation program that includes regular contact with regulators, businesses, community leaders and interest groups. KTT Project-related consultation activities completed to date have included verbal communications with all relevant parties as well as the distribution of a quarterly project information bulletin.

During the preparation of the EP, consultation with stakeholder groups concerning the mobilisation of the Edda Fides has taken place, primarily within the commercial fishing industry.

CONTACT DETAILS

For further information on the Marlin B platform hook-up and non-process hydrocarbons commissioning activities please contact:

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