

#	Comments received	Titleholder response
1	<p>Matter: Emergency response capacity and capability</p> <p>Claim: Western Gas are not adequately resourced with trained personnel to establish and sustain a CMT and DIMT, over the duration of the response timeframe outlined within the EP and OPEP, for a loss of well control incident.</p>	<p>Western Gas has developed an emergency response structure and resourcing plan that is commensurate with credible marine pollution scenarios modelled for the proposed activity, these being a gas/condensate release from the well and a marine diesel spill from a vessel collision. This structure and resourcing plan is adaptable and scalable in the unlikely event of a marine pollution event resulting from more persistent hydrocarbons.</p> <p>Western Gas outlines in the OPEP (Section 4.1) the response strategy selection for its modelled scenarios. Source control has been identified as the initial and highest priority response for a loss of well control. Concurrent activities would take place involving Monitoring, Evaluation and Surveillance (MES) and waste management.</p> <p>To enhance its internal capabilities, Western Gas has a resourcing model drawing on industry expertise for technical aspects of its business activities, including emergency response management.</p> <p>In support, Western Gas has prepared an OPEP resourcing plan to support the activities of the Crisis Management Team coordinated by Western Gas (Titleholder), the Drilling Incident Management Team activities coordinated by AGR (Well Engineering and Well Delivery Manager) and vessel/helicopter Incident Management Teams.</p> <p>A summary of this plan outlining all externally sourced oil spill response contractors and the form of engagement has been included in Section 3.6 of the OPEP to demonstrate the significant depth of capacity and capability to manage an incident. These specialist contractors include AMOSC Core Group, source control contractor, ROV suppliers, vessel providers, operational and scientific monitoring services and industry mutual aid through Western Gas' APPEA membership.</p> <p>The OPEP has been prepared in accordance with the AMSA Technical Guidelines for Preparing Contingency Plans for Marine and Coastal Facilities and is linked to the National Plan via the Industry AMOS Plan. Commonwealth and State oil spill response agencies were engaged in planning the EP, with feedback from the WA Department of Transport included in the OPEP submitted to NOPSEMA with the Environment Plan for assessment.</p>

		<p>It will also undergo an independent resourcing needs analysis (AMOSOC) using the worst-case oil spill trajectory modelling and hydrocarbon compositions to review Western Gas' predicted peak CMT, DIMT and support organisation requirements relative to the considered scenarios.</p> <p>Oil spill response training and exercises will be conducted pre-mobilisation, involving the CMT, DIMT, spill response organisations, key third party contractors, and potentially Government agencies using the marine pollution scenarios modelled for Sasanof-1.</p> <p>All learnings from training, exercises and third-party reviews will be incorporated into the OPEP prior to mobilisation.</p>
2	<p>Matter: NOPSEMA Guidance Note – oil pollution risk management</p> <p>Claim: Western Gas have note (sic) adequately addressed the requirements of NOPSEMA's Guidance Note, N-04750-GN1488 A382148, specifically Sections 4 & 5 of the guidance note.</p>	<p>Western Gas has undertaken a gap analysis of its OPEP for the proposed activity to ensure it meets the requirements of NOPSEMA's Guidance Note, N-04750-GN1488 A382148.</p> <p>The gap analysis demonstrated that Western Gas' OPEP meets the requirements of Sections 4 and 5 of the Guidance Note. To further demonstrate the competence of the OPEP, Western Gas has provided additional information in the OPEP to provide greater clarity and transparency on the company's response arrangements.</p> <p>This information includes an update to Appendix B to provide further details on:</p> <ul style="list-style-type: none"> • Arrangements in place and capability for timely response; • Maintenance of arrangements and capability; and • Incident Management Capabilities.