Santos

Bedout Multi-Well Drilling Oil Pollution Emergency Plan

PROJECT / FACILITY	Bedout Multi-Well
REVIEW INTERVAL	60 Months
SAFETY CRITICAL DOCUMENT	NO

Rev	Owner	Reviewer/s Managerial/Technical/Site	Approver
3	Senior Oil Spill Response Coordinator	Environmental Approvals Team Lead	Manager – HSE Offshore Division

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Santos Company Site Representative (CSR)	link only	
IMT Room – Perth office		● x 4
AMOSC	●	
DoT	●	
AMSA	●	
OSRL	●	

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List of Acronyms

Abbreviation	Description
AIS	automatic identification system
ALARP	as low as reasonably practicable
AMOSC	Australian Marine Oil Spill Centre Pty Ltd
AMP	Australian Marine Park
AMSA	Australian Marine Safety Authority
APASA	Asia-Pacific Applied Sciences Associates
APPEA	Australian Petroleum Production & Exploration Association
API	American Petroleum Institute
BAOAC	Bonn Agreement Oil Appearance Codes
C&R	containment and recovery
CHARM	chemical hazard and risk management
CMT	Crisis Management Team
CSR	company site representative
DBCA	Department of Biodiversity, Conservation and Attractions
DFAT	Department of Foreign Affairs and Trade
DISER	Department of Industry, Science, Energy and Resources
DMIRS	Department of Mines, Industry Regulation and Safety
DoE	(Australian) Department of the Environment (now Department of the Environment and Energy)
DOR	dispersant to oil ratio
DoT	Department of Transport
DPIRD	Department of Primary Industries and Regional Development
DWER	Department of Water and Environment Regulation
EMBA	environment that may be affected
EP	Environment Plan
ER	emergency response
ESC	Environmental Scientific Coordinator
FOB	forward operating base
FPSO	floating production, storage and offloading vessel
FWADC	fixed wing aerial dispersant capability
GIS	geographic information system
GPS	global positioning system

Abbreviation	Description
HMA	Hazard Management Agency
HR	human resources
IAP	Incident Action Plan
ICC	incident command centre
IMT	Incident Management Team
IR	industrial relations
IUCN	International Union for Conservation of Nature
LAT	lowest astronomical tide
LOWC	loss of well control
MARPOL	International Convention for the Prevention of Pollution from Ships
MEECC	Maritime Environmental Emergency Coordination Centre
MEER	Maritime Environmental Emergency Response
MNES	matters of national environmental significance
MODU	mobile offshore drilling unit
MoU	Memorandum of Understanding
MP	marine park
MSA	Master Services Agreement
MSP	monitoring service providers
N	North
NatPlan	National Plan for Maritime Environmental Emergencies
NEBA	net environmental benefit analysis
NOPSEMA	National Offshore Petroleum Safety and Environment Management Authority
NW	North-west
OPEP	Oil Pollution Emergency Plan
OPGGS(E) Regulations	Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009
OSC	on-scene commander
OSRL	Oil Spill Response Limited
OSTM	oil spill trajectory modelling
OWR	oiled wildlife response
PPA	Priority Protection Area
PS	people services
S	South
SCP	Source Control Plan

Abbreviation	Description
SDA	surface dispersant application
SFRT	Subsea First Response Toolkit
SHP-MEE	State Hazard Plan for Maritime Environmental Emergencies
SIMA	spill impact mitigation assessment
SMP	Scientific Monitoring Plan
SMPC	State Marine Pollution Coordinator
SMPEP	Shipboard Marine Pollution Emergency Plan
SOPEP	Shipboard Oil Pollution Emergency Plans
SSDI	Subsea dispersant injection
SW	South-west
TRG	The Response Group
TRP	Tactical Response Plan
UAV	unmanned aerial vehicle
VI	Varanus Island
VOC	volatile organic compound
VOO	vessels of opportunity
VPO	Vice President Offshore Upstream WA
W	West
WA	Western Australia
WAOWRP	Western Australian Oiled Wildlife Response Plan
WOMP	Well Operation Management Plan
WSP	waste service provider
WWC	Wild Well Control

1 Quick Reference Information

<table>
<tr><th>Parameter</th><th colspan="3">Description</th><th>Further Information</th></tr>
<tr><td>Petroleum Activity</td><td colspan="3">The operational area has been specifically limited to the Pavo prospect in WA-438-P and the Apus prospect which straddles the lease line between WA-437-P and WA-438-P with water depths of approximately 65-93 m. Drilling to be performed using a jack-up mobile offshore drilling unit (MODU), with auxiliary activities including support vessels, helicopters and ROV</td><td>Section 2 of the Environment Plan (EP)</td></tr>
<tr><td rowspan="2">Location (Lat/Long)</td><td colspan="3">Apus-1
Latitude: 19° 11' 25.29" S
Longitude: 118° 59' 10.64" E</td><td rowspan="2">Table 2-3 of the EP</td></tr>
<tr><td colspan="3">Pavo-1
Latitude: 19° 00' 48.18" S
Longitude: 119° 10' 45.22" E</td></tr>
<tr><td>Petroleum Title/s (Blocks)</td><td colspan="3">WA-437-P and WA-438-P (all Commonwealth waters)</td><td>Table 2-1 of the EP</td></tr>
<tr><td>Installation Type</td><td colspan="3">2 exploration wells named Pavo-1 and Apus-1. Up to 6 appraisal wells</td><td>Section 2 of the EP</td></tr>
<tr><td>Water Depth</td><td colspan="3">65 to 93 m</td><td>N/A</td></tr>
<tr><td rowspan="4">Worst-case Spill Scenarios</td><td>Scenario</td><td>Hydrocarbon</td><td>Worst-case volume (m^3)</td><td rowspan="4">Section 6.1</td></tr>
<tr><td>Loss of well control (LOWC) (subsea release)</td><td>Caley Condensate</td><td>1,745,986</td></tr>
<tr><td>LOWC (surface release)</td><td>Caley Condensate</td><td>1,746,355</td></tr>
<tr><td>Surface diesel release (surface spill)</td><td>Marine Diesel Oil (MDO)</td><td>329</td></tr>
<tr><td>Hydrocarbon Properties</td><td colspan="3">Caley Condensate [1,2]
Specific gravity = 0.7737
Dynamic viscosity (cSt) = 1.878 @ 20° C
American Petroleum Institute (API) Gravity = 51.4
Marine Diesel Oil
Density kg/m^3 at 25°C = 829
Dynamic viscosity (cP) = 3.9 @ 20° C
API Gravity = 37.6</td><td>Appendix A</td></tr>
</table>

Parameter	Description	Further Information
Weathering Potential	Caley Condensate [1,2] is a condensate with a moderate degree of persistence in the marine environment. Under moderate winds (5 m/s), 62% of the initial surface slick is predicted to evaporate within 48 hours, with the remaining 38% dispersing into the water column within 78 hours. MDO is a mixture of volatile and persistent hydrocarbons with low viscosity. It will spread quickly and thin out to low thickness levels, thereby increasing the rate of evaporation. Up to 60% will generally evaporate over the first two days. Approximately 5% is considered "persistent hydrocarbons", which are unlikely to evaporate and will decay over time.	**Appendix A**
Protection Priorities	Ashmore Reef Australian Marine Park (AMP), Broome-Roebuck Barrow Island, Barrow-Montebello Surrounds, Bedout Island, Port Hedland-Eighty Mile Beach, Karratha-Port Hedland, Roebuck-Eighty Mile Beach, Southern Island Coast, Clerke Reef Marine Park (MP), Dampier Archipelago, Eighty Mile Beach, Exmouth Gulf Coast, Imperieuse Reef MP, Lowendal Islands, Montebello Islands, Barrow Island, Muiron Islands and Ningaloo Coast North	**Section 6.6**

[1] *Caley Condensate has also been referred to as 'Caley Condensate' and 'Caley Crude' (Intertek 2020) however the properties of the hydrocarbon are more aligned to a condensate.*

[2] *LAVRANS condensate was used as a modelling analogue for Caley Condensate.*

2 First Strike Response Actions

The initial response actions to major oil spill incidents will be undertaken by the relevant Vessel Master or the Offshore Installation Manager, depending on the nature of the incident (vessel or MODU based).

If the spill is related to the MODU, the rig Offshore Installation Manager (hereafter referred to as the On-Scene Commander or OSC) will be notified, or in the case of a support vessel, the Vessel Master will be notified.

Following those initial actions undertaken by the On-Scene Commander or Vessel Master to ensure the safety of personnel on the vessel or MODU, and to control the source of the spill, the Santos Company Site Representative will assess the situation based on:

+ What has caused the spill?
+ Is the source under control?
+ What type of hydrocarbon has been spilled?
+ How much has been spilled?

For spills from support vessels, initial response actions to major incidents are under the direction of the Vessel Master and in accordance with vessel-specific procedures (e.g. Shipboard Oil Pollution Emergency Plans (SOPEPS)).

Response information contained within this Oil Pollution Emergency Plan is concerned primarily with a large scale (Level 2/3) hydrocarbon spill where the Perth-based Incident Management Team (IMT) and Santos Crisis Management Team (CMT) are engaged for support and implementation of response strategies. Level 1 spills are managed through on-site response and IMT is available to assist with regulatory requirements/notifications and support as required. Therefore, the immediate response actions listed in **Table 2-1** are relevant for any spill. Once sufficient information is known about the spill, the Incident Commander will classify the level of the spill. If the spill is classified as a Level 1 spill, then the actions related to Level 2/3 spills do not apply, unless specified by the Incident Commander.

Table 2-1: First strike activations

When (indicative)	Activations		Who
	Objective	Action	
All spills			
Immediate	Manage the safety of personnel	Implement site incident response procedures (MODU Operator's Emergency Response Plan and Santos MODU Operator Emergency Response Bridging document) or vessel-specific procedures, as applicable	On-Scene Commander/Vessel Master
Immediate	Control the source using site resources, where possible	Control the source using available onsite resources (MODU/vessel) Refer to source control plan – **Section 9**	On-Scene Commander/Vessel Master
30 minutes of incident being identified	Notify Santos Offshore Duty Manager	Verbal communication to Offshore Duty Manager's duty phone	On-Scene Commander via the Company Site Representative (CSR)
As soon as practicable	Obtain as much information about the spill as possible	Provide as much information to the IMT (Incident Commander or delegate) as soon as possible	On-Scene Commander via CSR
60 minutes	Gain situational awareness and begin onsite spill surveillance	If spill reaches marine waters gain further situational awareness by undertaking surveillance of the spill from vessel or MODU Refer to Monitor and Evaluate Plan – **Section 10**	On-Scene Commander via CSR Incident Commander
Refer timeframes Go to **Section 7**	Make regulatory notifications within regulatory timeframes	Activate the External Notifications and Reporting Procedures – **Section 7**	Initial notifications by Environment Unit Leader / Safety Officer – **Table 7-1**

When (indicative)	Activations		Who
	Objective	Action	
Level 2/3 spills (in addition to actions above)			
Immediately once notified of spill (to Incident Commander)	Activate IMT, if required	Notify IMT	Duty Manager Incident Commander
IMT actions (0 to 48 hours)			
Within 90 minutes from IMT callout	Set-up IMT room	Refer to IMT tools and checklists for room and incident log set-up	Incident Commander Data Manager
	Gain situational awareness and set incident objectives, strategies and tasks	Begin reactive Incident Action Planning process Go to **Section 8** Review First Strike Activations (this table)	Incident Commander Planning Section Chief
Refer timeframes **Section 7**	Make regulatory notifications as required Notify and mobilise/put on standby external oil spill response organisations and support organisations, as required	Go to **Section 7**	Initial notifications by Environment Unit Leader / Safety Officer Oil Spill Response Organisations (Australian Marine Oil Spill Centre [AMOSC], Oil Spill Response Ltd [OSRL]) and The Response Group (TRG) activation by designated call-out authorities (Incident Commanders/Duty Managers)

When (indicative)	Activations		Who
	Objective	Action	
Refer timeframes **Section 10**	Implement monitor and evaluate tactics in order to provide situational awareness to inform IMT decision making	Vessel Surveillance (**Section 10.1**) Aerial Surveillance (**Section 10.2**) Tracking Buoys (**Section 10.3**) Oil Spill Trajectory Modelling (**Section 10.4**) Initial Oil Characterisation (**Section 10.6**) Operational Water Quality Monitoring (**Section 10.7**) Shoreline Clean-up Assessment (**Section 10.8**)	Operations Section Chief Logistics Section Chief / Supply Unit Leader Environment Unit Leader
Activate on Day 1 for applicable scenarios	Source control support to stop the release of hydrocarbons into the marine environment. **Degree of IMT support will be -scenario dependent**	Go to **Section 9**	Operations Section Chief (Source Control Branch Director as appropriate to scenario) Logistics Section Chief / Supply Unit Leader
Activate on Day 1 for applicable scenarios Refer **Section 12** and **13**	Reduce exposure of shorelines and wildlife to floating oil through mechanical/ chemical dispersion	For Caley Condensate spills: Activate the Mechanical and/or Chemical Dispersion Plan Go to **Section 12** and/or **13**	Operations Section Chief Logistics Section Chief / Supply Unit Leader
Activate on Day 1 for applicable scenarios Refer **Section 11**	Implement containment and recovery tactics to reduce the volume of surface hydrocarbons to reduce contact with protection priorities	Activate the Containment and Recovery Plan Go to **Section 11**	Operations Section Chief Logistics Section Chief / Supply Unit Leader
Day 1	Identify environmental sensitivities at risk and conduct Net Environmental Benefit Analysis (NEBA)	Review situational awareness and spill trajectory modelling Review strategic NEBA and begin operational NEBA (**Section 6.7**)	Environment Unit Leader

When (indicative)	Activations		Who
	Objective	Action	
Day 1	Develop forward operational base/s to support forward operations	Begin planning for forward operations base as per Forward Operations Plan. **Appendix R**	Operations Section Chief Logistics Section Chief / Supply Unit Leader
Day 1	Ensure the health and safety of spill responders	Identify relevant hazards controls and develop hazard register Begin preparation Site Health and Safety Management requirements Refer Oil Spill Response Health and Safety Management Manual (SO-91-RF-10016)	Safety Officer
If/when initiated Refer **Section 14**	Protect identified shoreline protection priorities	Activate the Shoreline Protection and Deflection Plan Go to **Section 14**	Operations Section Chief Logistics Section Chief / Supply Unit Leader Environment Unit Leader
If/when initiated Refer **Section 16**	Prevent or reduce impacts to wildlife	Activate the Oiled Wildlife Response Plan Go to **Section 16**	Environment Unit Leader Operations Section Chief Logistics Section Chief / Supply Unit Leader
If/when initiated Refer **Section 18**	Assess and monitor impacts from spill and response	Activate the Scientific Monitoring Plan Go to **Section 18**	Environment Unit Leader Logistics Section Chief / Supply Unit Leader Operations Section Chief
If/when initiated	Clean-up oiled shorelines	Activate Shoreline Clean-Up resources Go to **Section 15**	Operations Section Chief Logistics Section Chief / Supply Unit Leader

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When (indicative)	Activations		Who
	Objective	Action	
If/when initiated	Safely transfer, transport and dispose of waste collected from response activities.	Activate the Waste Management Plan. Go to **Section 17**	Operations Section Chief Logistics Section Chief / Supply Unit Leader
IMT Actions (48+ hours)			
Ongoing	+ For ongoing incident management – indicatively 48 + hours – a formal incident action planning process is to be adopted to continue with spill response strategies identified above. An Incident Action Plan (IAP) is to be developed for each successive operational period. + Santos will maintain control for those activities for which it is the designated Control Agency/Lead IMT. + Depending on the specifics of the spill, Australian Maritime Safety Authority (AMSA) and/or Western Australia (WA) Department of Transport (DoT) may be relevant Control Agencies (refer **Section 4.2**). + Where another Control Agency has taken control of aspects of the response, Santos will provide support to that Control Agency. Santos' support to DoT for a State waters response is detailed in **Section 5.2.3**.		Control Agency IMT Santos to provide the following roles to DoT MEECC/IMT for State waters response: + CMT Liaison Officer + Deputy Incident Controller + Deputy Intelligence Officer + Deputy Planning Officer + Environment Support Officer + Deputy Public Information Officer + Deputy Logistics Officer + Deputy Waste Management Coordinator + Deputy Finance Officer + Deputy Operations Officer + Deputy Division Commander (Forward Operating Base [FOB])

3 Introduction

This document is the accompanying Oil Pollution Emergency Plan (OPEP) to the *Bedout Multi-Well Drilling Environment Plan* (*SO-00-BI-20003*) required by Regulation 14(8) of the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 (OPGGS (E) Regulations).

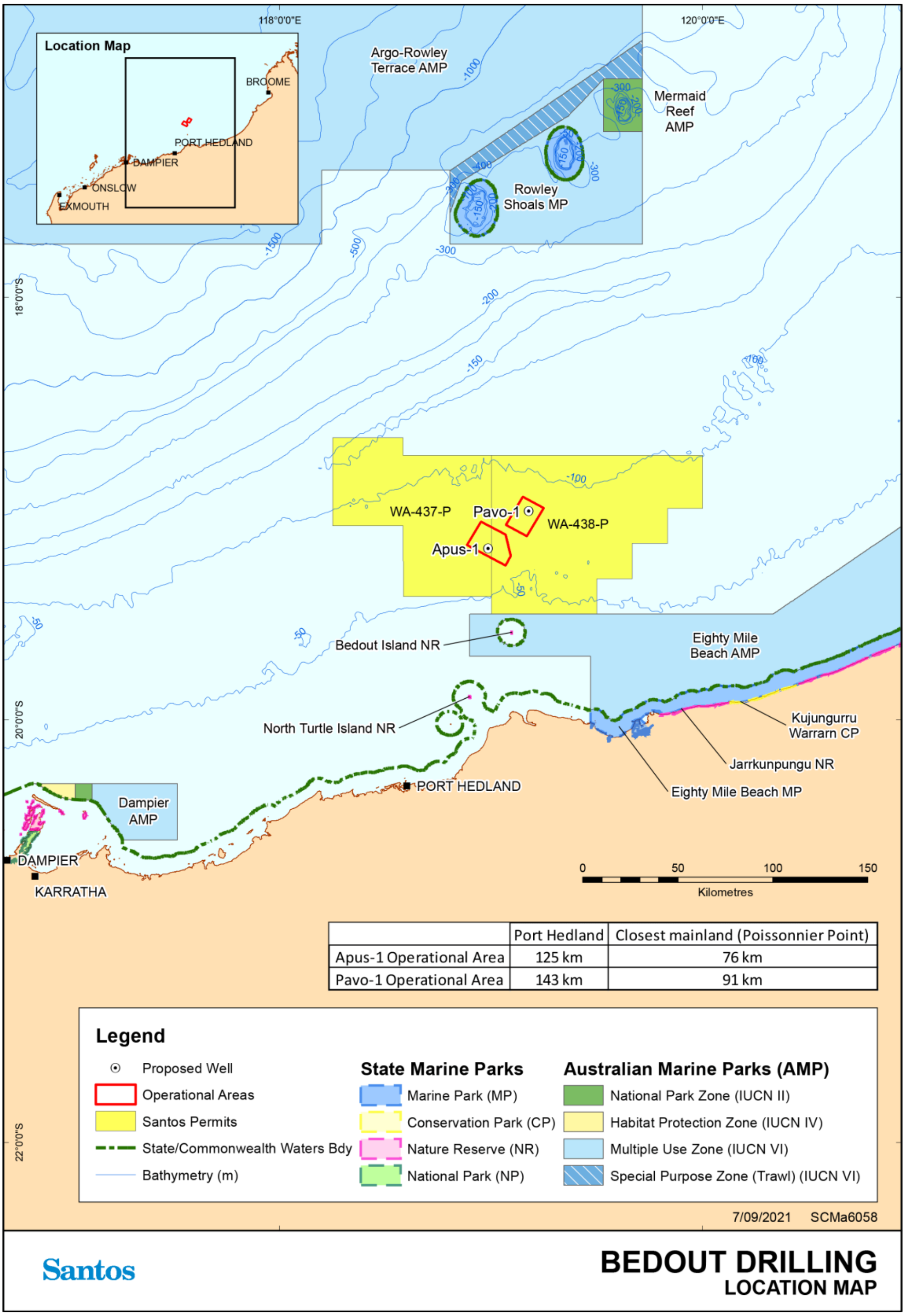
3.1 Description of activity

Santos proposes to drill 2 exploration wells named Pavo-1 and Apus-1, and up to 6 appraisal wells throughout the Bedout Multi-Well Drilling Operational Area, located in permit areas WA-437-P and WA-438-P (all Commonwealth Waters) (**Figure 3-1**).

The Operational Area is wholly within Commonwealth Waters of the Bedout Basin (a sub-basin of the Roebuck Basin) in the NW Shelf region of Western Australia. Water depths in the Operational Area range from approximately 65 m to 93 m.

Drilling will be undertaken using a jack-up MODU, with auxiliary activities including support vessels and helicopters. Specific activities will include well evaluation, well testing and abandonment activities related to exploration and appraisal drilling. A 500 m circular exclusion zone will be applied around the MODU centred at the rig's surface location, with only one MODU operating in the exclusion zone at any point in time (multiple support vessels and helicopters may be operating in the same area at any one time).

Refer to Section 2 of the Bedout Multi-Well Drilling EP (SO-00-BI-20003) for detail on the activity.



	Port Hedland	Closest mainland (Poissonnier Point)
Apus-1 Operational Area	125 km	76 km
Pavo-1 Operational Area	143 km	91 km

Figure 3-1: Location of the Bedout multi-well drilling operational area

3.2 Purpose

The purpose of this OPEP is to describe Santos' response to a hydrocarbon spill during Bedout Multi-Well Drilling activities.

This OPEP has been developed to meet all relevant requirements of the Commonwealth (OPGGS (E) Regulations. It is consistent with the national and State (WA) systems for oil pollution preparedness and response, being the National Plan for Maritime Environmental Emergencies (NatPlan) managed by AMSA and the WA State Hazard Plan for Maritime Environmental Emergencies (SHP-MEE).

This OPEP is to be read in conjunction with the Bedout Multi-Well Drilling EP (SO-00-BI-20003) when considering the existing environment, environmental impacts, risk management, performance standards and the reporting compliance requirements.

This OPEP will apply from acceptance of the Santos Bedout Multi-Well Drilling EP (SO-00-BI-20003) and will remain valid for the duration of life of the EP.

The response strategies outlined in this OPEP have been developed by Santos utilising risk assessments to identify credible worst case hydrocarbon spill scenarios, expected/calculated release rates, known information of hydrocarbon types and behaviour, and expected partitioning of the hydrocarbon within the marine environment with an estimate of the volume of persistent oil. This information has been modelled to give a theoretical zone of dispersion that is used to identify potential sensitive receptors and response strategies required to reduce the consequences of a spill to 'as low as reasonably practicable' (ALARP). The response strategies are identified under a NEBA process so the most effective response strategies with the lowest environmental consequences can be identified, documented and prepared for.

3.3 Objectives

The aim of this OPEP is to provide detailed guidance to Santos' IMT, so that it will direct its response effort with the aim of preventing long term significant environmental impacts by safely limiting the adverse environmental effects from an unplanned release of hydrocarbons to the marine environment to a level that is ALARP. This will be achieved through the implementation of the various strategies and spill response mechanisms presented throughout this OPEP. Through their implementation, Santos will:

+ initiate spill response immediately following a spill
+ establish source control as soon as reasonably practicable to minimise the amount of oil being spilt into the environment
+ assess the spill characteristics and understand its fate in order to be able to make informed and clear response decisions
+ monitor the spill to identify the primary marine and coastal resources requiring protection
+ remove as much oil as possible from the marine environment while keeping environmental impacts from the removal methods to ALARP
+ reduce the impacts of the remaining floating and stranded oil to ALARP
+ respond to the spill using efficient response strategies that do not damage the environment themselves
+ comply with all relevant environmental legislation when implementing this OPEP
+ conduct all responses safely without causing harm to participants

+ monitor the impacts from a spill until impacted habitats have returned to baseline conditions
+ remain in a state of 'Readiness' at all times for implementation of this OPEP by keeping resources ready for deployment, staff fully trained and completing response exercises as scheduled
+ keep stakeholders informed of the status of the hydrocarbon spill response to aid in the reduction of social and economic impacts.

3.4 Area of operation

The Bedout Multi-Well Drilling EP (SO-00-BI-20003) is located within petroleum permit areas WA-437-P and, WA438-P which are located in Commonwealth Waters. The nearest landmass to the operational areas is Bedout- Island, located approximately 35 km south of Apus-1, with the nearest significant landmass, De Grey River-mouth, located approximately 76 km south of Apus-1. Port Hedland and Karratha are located 125 km south and 275 km southwest of Apus-1 respectively (see **Figure 3-2**). Water depths in the operational areas range between 65 m and 93 m.

Section 3 of the Bedout Multi-Well Drilling EP (SO-00-BI-20003) includes a comprehensive description of the existing environment. A summary of nearest regional features and distances from Operational Area are provided in **Table 3-1**.

Table 3-1: Approximate distances from operational area to key regional features

Regional Feature	Approximate Distance from Apus-1
Ningaloo Marine Park (IUCN II)	559 km SW
Eighty Mile Beach Marine Park	26 km S
State/Commonwealth waters boundary	40 km S/352 km N
Muiron Islands Marine Management Area (IUCN VI)	537 km W
Barrow Island Marine Park	406 km SW
North West Cape (Mainland WA)	472 km SW

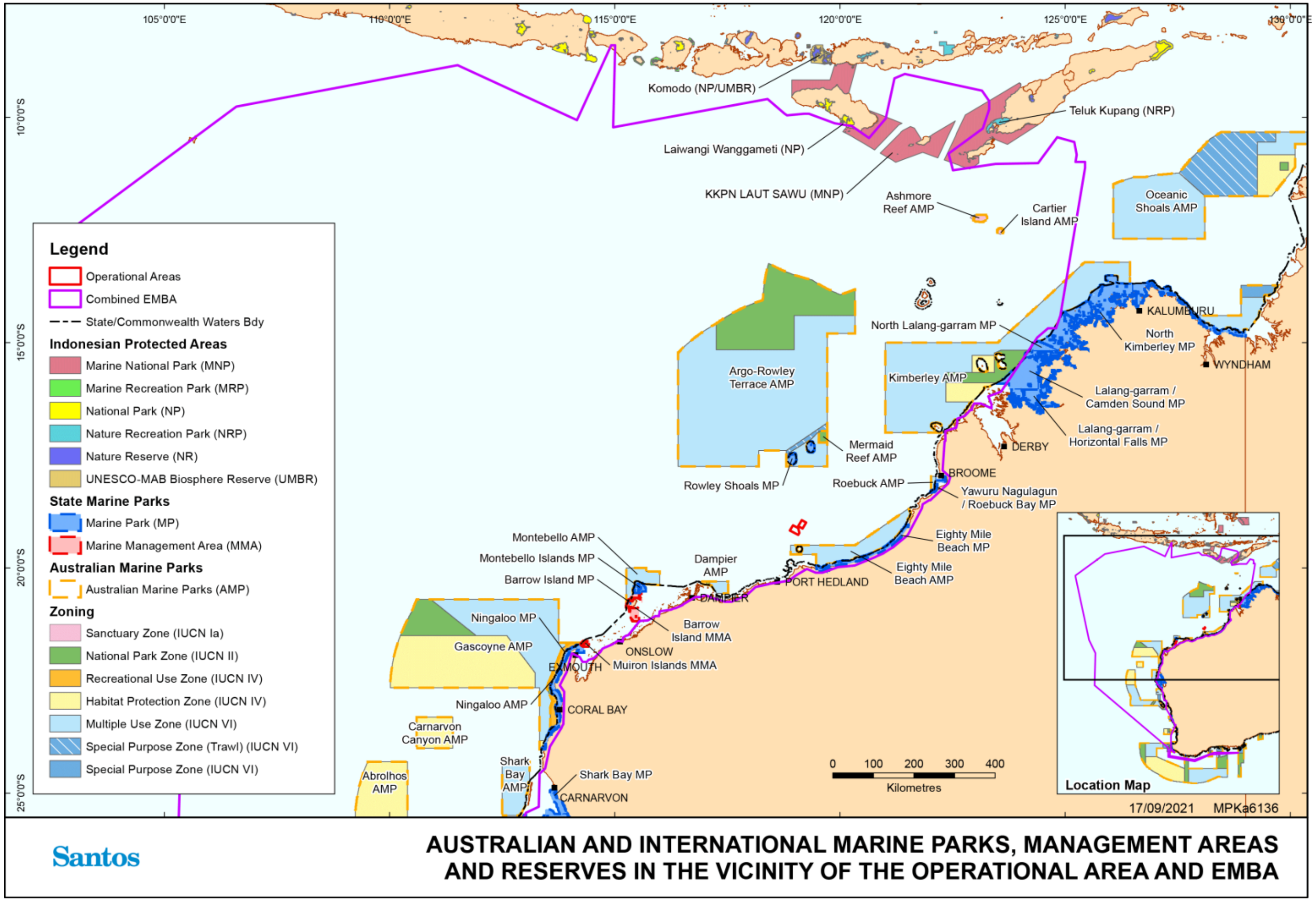


Figure 3-2: Bedout multi-well drilling location map and regional features

3.5 Interface with internal documents

In addition to this OPEP, a number of other Santos documents provide guidance and instruction relevant to spill response, including:

+ Incident Command & Management Manual (SO-00-ZF-00025)
+ Bedout Multi-Well Drilling Environment Plan (SO-00-BI-20003.01)
+ MODU Operator's Emergency Response Plan
+ Santos-MODU Operator Emergency Response Bridging Document
+ Incident Response Telephone Directory (SO-00-ZF-00025.020)
+ Refuelling and Chemical Management Standard (SO-91-IQ-00098)
+ Santos Offshore Source Control Planning and Response Guideline (DR-00-OZ-20001)
+ -Well Specific or Campaign Source Control Plan
+ Oil Pollution Waste Management Plan (SO-91-IF-10053)
+ Oil Spill Response Health and Safety Manual (SO-91-RF-10016)
+ Santos Wildlife Framework Plan (SO-91-BI-20014)
+ Oil Spill Scientific Monitoring Plan (EA-00-RI-10099)
+ Oil Spill Scientific Monitoring Standby and Response Manual (EA-00-RI-10162)
+ Oil Spill Scientific Monitoring Baseline Data Review (SO-91-RF-20022)
+ Santos Offshore Division Incident and Crisis Management Training and Exercise Plan (SO-92-HG-10001)
+ Santos Offshore Division Oil Spill Response Readiness Guideline (SO-91-OI-20001)

Relevant Tactical Response Plans are made available within the 'First Strike Resources' folder within the Offshore Emergency Response on Santos intranet site.

4 Oil Spill Response Framework

4.1 Spill response levels

Santos uses a tiered system of incident response levels consistent with State and National incident response plans including SHP-MEE and the NatPlan. Spill Response Levels help to identify the severity of an oil spill incident and the level of response required to manage the incident and mitigate environmental impacts. Incident response levels are outlined within the Santos Incident Command and Management Manual (SO-00-ZF-00025) and further detailed in **Table 4-1** for hydrocarbon spills.

Table 4-1: Santos oil spill response levels

Level 1	
An incident which will not have an adverse effect on the public or the environment which can be controlled by the use of resources normally available onsite without the need to mobilise the Santos IMT or other external assistance.	
Oil is contained within the incident site. Spill occurs within immediate site proximity. Discharge in excess of permitted oil in water (OIW) content (15 ppm). Incident can be managed by the Emergency Response Team and its resources.	Source of spill has been contained. Oil is evaporating quickly and no danger of explosive vapours. Spill likely to naturally dissipate. No media interest/not have an adverse effect on the public.
Level 2	
An incident that cannot be controlled by the use of onsite resources alone and requires external support and resources to combat the situation; or **An incident that can be controlled on-site but which may have an adverse effect on the public or the environment.**	
Danger of fire or explosion. Possible continuous release. Concentrated oil accumulating in close proximity to the site or vessel. Potential to impact other installations.	Level 1 resources overwhelmed, requiring additional regional resources. Potential impact to sensitive areas and/or local communities. Local/national media attention/may adversely affect the public or the environment.
Level 3	
An incident which has a wide-ranging impact on Santos and may require the mobilisation of external state, national or international resources to bring the situation under control.	
Loss of well integrity. Actual or potentially serious threat to life, property, industry. Major spill beyond site vicinity. Significant shoreline environmental impact.	Level 2 resources overwhelmed, requiring international assistance. Level 3 resources to be mobilised. Significant impact on local communities. International media attention.

4.2 Jurisdictional authorities and control agencies

During a spill response there will be both a Jurisdictional Authority and a Control Agency assigned to the oil spill incident for all spill response levels.

Definitions of Jurisdictional Authority and Control Agency are as follows:

+ Control Agencies: the organisation assigned by legislation, administrative arrangements or within the relevant contingency plan, to control response activities to a maritime environmental emergency. Control Agencies have the operational responsibility of response activities but may have arrangements in place with other parties to provide response assistance under their direction.
+ Jurisdictional Authority: the agency which has responsibility to verify that an adequate spill response plan is prepared and, in the event of an incident, that a satisfactory response is implemented. The Jurisdictional Authority is also responsible for initiating prosecutions and the recovery of clean-up costs on behalf of all participating agencies.

With respect to a hydrocarbon spill from Bedout Multi-Well Drilling activities, the relevant Jurisdictional Authority and Control Agency varies dependent upon the location of the oil pollution (Commonwealth or State waters), the nature of the incident (vessel based or petroleum activity) and the spill response level (refer **Table 4-2**).

To aid in the determination of a vessel versus a facility spill, the following guidance is adopted:

+ A vessel is a ship at sea to which the *Navigation Act 2012* applies.
+ A facility is a petroleum facility as defined under the OPGGS Act, Volume 3, Schedule 3, Part 1, Clause 4 & Volume 2, Part 6.8, Section 640.

Table 4-2: Jurisdictional authorities and control agencies for Bedout multi-well drilling oil spill response

Role	Spill Level	State waters/shoreline oil pollution		Commonwealth waters oil pollution	
		Petroleum Activity[1]	Vessel[2]	Petroleum Activity	Vessel
Control Agency	1	Petroleum Titleholder (Santos)	DoT	Petroleum Titleholder (Santos)	AMSA
	2/3	WA DoT	DoT	Petroleum Titleholder (Santos)	AMSA
Jurisdictional Authority	1/2/3	WA DoT	DoT	NOPSEMA	AMSA

[1] Includes a 'Facility', such as a fixed platform, FPSO/FSO, MODU, subsea infrastructure, or a construction, decommissioning and pipelaying vessel. As defined by Schedule 3, Part 1, Clause 4 of the OPGGSA 2006.

[2] Vessels are defined by Australian Government Coordination Arrangements for Maritime Environmental Emergencies (AMSA, 2017) as a seismic vessel, supply or support vessel, or offtake tanker.

4.3 Petroleum activity spill in Commonwealth waters

For an offshore petroleum activity spill in Commonwealth waters, the Jurisdictional Authority is National Offshore Petroleum Safety and Environment Management Authority (NOPSEMA). NOPSEMA is responsible for the oversight of response actions to pollution events from offshore Petroleum Activities, in areas of Commonwealth jurisdiction. During a spill incident, NOPSEMA's role will be to implement regulatory processes to monitor and secure compliance with the *OPGGS Act 2006* and *OPGGS (E) Regulations*, including the issuing of directions as required, and investigate accidents, occurrences and circumstances involving deficiencies in environment management.

Under the *OPGGS (E) Regulations* and the *OPGGS Act 2006*, the Petroleum Titleholder (i.e., Santos) is responsible for responding to an oil spill incident as the Control Agency in Commonwealth waters, in accordance with its OPEP.

Santos is responsible as Control Agency unless NOPSEMA identifies a requirement to delegate control. In this situation, Control Agency responsibility may be delegated to AMSA who will assume control of the incident and respond in accordance with AMSA's NatPlan. In such an occurrence, Santos would assume a Support Agency role and make available all necessary resources to support AMSA in AMSA's performance of their Control Agency responsibilities.

4.4 Cross-jurisdiction facility spills

For a Level 2/3 Petroleum Activity spill, there is the possibility of the spill crossing jurisdictions between Commonwealth and State waters. In these instances, the Jurisdictional Authority remains true to the source of the spill (i.e., NOPSEMA for Commonwealth waters and DoT for State waters). Where a Level 2/3 spill originating in Commonwealth waters moves into State waters two Control agencies will exist: DoT and the Petroleum Titleholder (Santos), each with its own IMT and Lead IMT responsibilities.

The arrangements between DoT and Santos for sharing resources and coordinating a response across both Commonwealth and State waters are further detailed in **Section 5.2.3**.

4.5 Vessel spills in Commonwealth waters

For a vessel incident originating in Commonwealth Waters, the jurisdictional authority and control agency is AMSA. AMSA is the national shipping and maritime industry regulator and was established under the *Australian Maritime Safety Authority Act 1990*. AMSA manages the NatPlan on behalf of the Australian Government, working with State and the Northern Territory governments, emergency services and private industry to maximise Australia's marine pollution response capability.

Santos will be responsible for coordinating a first-strike response to a vessel-based spill in Commonwealth waters until such time as AMSA takes over the role as Control agency, at which time Santos would provide all available resources as a Supporting Agency.

4.6 Cross-jurisdictional vessel spills

For a large vessel spill (Level 2/3) that crosses Jurisdictions between Commonwealth and State waters, two Jurisdictional Authorities exist (AMSA for Commonwealth waters and DoT for State waters). Coordination of Control Agency responsibilities will be determined by DoT and AMSA, based on incident specifics with Santos providing first strike response and all necessary resources (including personnel and equipment) as a Supporting Agency.

5 Santos Incident Management

The Santos IMT (Perth) and CMT will be activated in the event of a Level 2/3 hydrocarbon spill regardless of the type of spill or jurisdiction. Santos maintains internal resources (trained personnel and equipment) across its activities that provide first strike response capability and to also support an ongoing response. Should an incident occur, the IMT Duty Manager would be notified immediately. This rostered role is on-call, filled by trained Incident Commanders and available 24 hours/day and 7 days/week. The IMT Duty Manager would then activate the IMT via an automated call-out system.

As outlined above, control of the response may be taken over by the relevant Control agency as the incident progresses. The Santos response structure to a major emergency incident is detailed in the Incident Command and Management Manual (SO-00-ZF-00025). The Incident Command and Management Manual describes response planning and incident management that would operate under emergency conditions – describing how the Santos IMT operates and interfaces with the CMT and external parties.

The first priority of an escalating oil spill response to a Level 2/3 spill is the formation of an IMT and establishment of an incident command centre (ICC). The ongoing involvement of the IMT and CMT will be dependent on the severity and type of spill and the obligations of Santos and other agencies/authorities in the coordinated spill response.

Santos' incident response structure relevant to a Bedout Multi-Well Drilling incident includes:

+ Facility-based Emergency Response Team
+ Santos IMT – Perth -based to coordinate and execute responses to an oil spill incident
+ Santos Crisis Management Team (CMT) – to coordinate and manage threats to the company's reputation and to handle Santos' corporate requirements in conjunction with the Perth -based Santos –Vice President Offshore Upstream WA
+ Other field-based command, response and monitoring teams for implementing strategies outlined within the OPEP.

The first priority of an escalating oil spill response is the formation of an IMT to establish an Incident Operations Centre. The establishment and involvement of the CMT will depend on the severity of the spill.

The Santos incident response organisational structure is defined in the Incident Command and Management Manual (SO-00-ZF-00025) and in **Figure 5-1** for reference.

If the incident involves a LOWC, the Santos Source Control Branch would also be included in the incident response structure. This team would be comprised of the following sub-teams, according to the applicable source control strategies:

+ Relief Well Team
+ Well Intervention Team

The Santos Source Control Branch would report directly to the Operations Section Chief and would be responsible for:

+ Coordinating engineering safety and operational activities

- Managing source control technical personnel from third parties (e.g. Wild Well Control)
- Developing task-specific plans and procedures
- Identifying and sourcing required tools and equipment
- Approving source control components of IAPs.

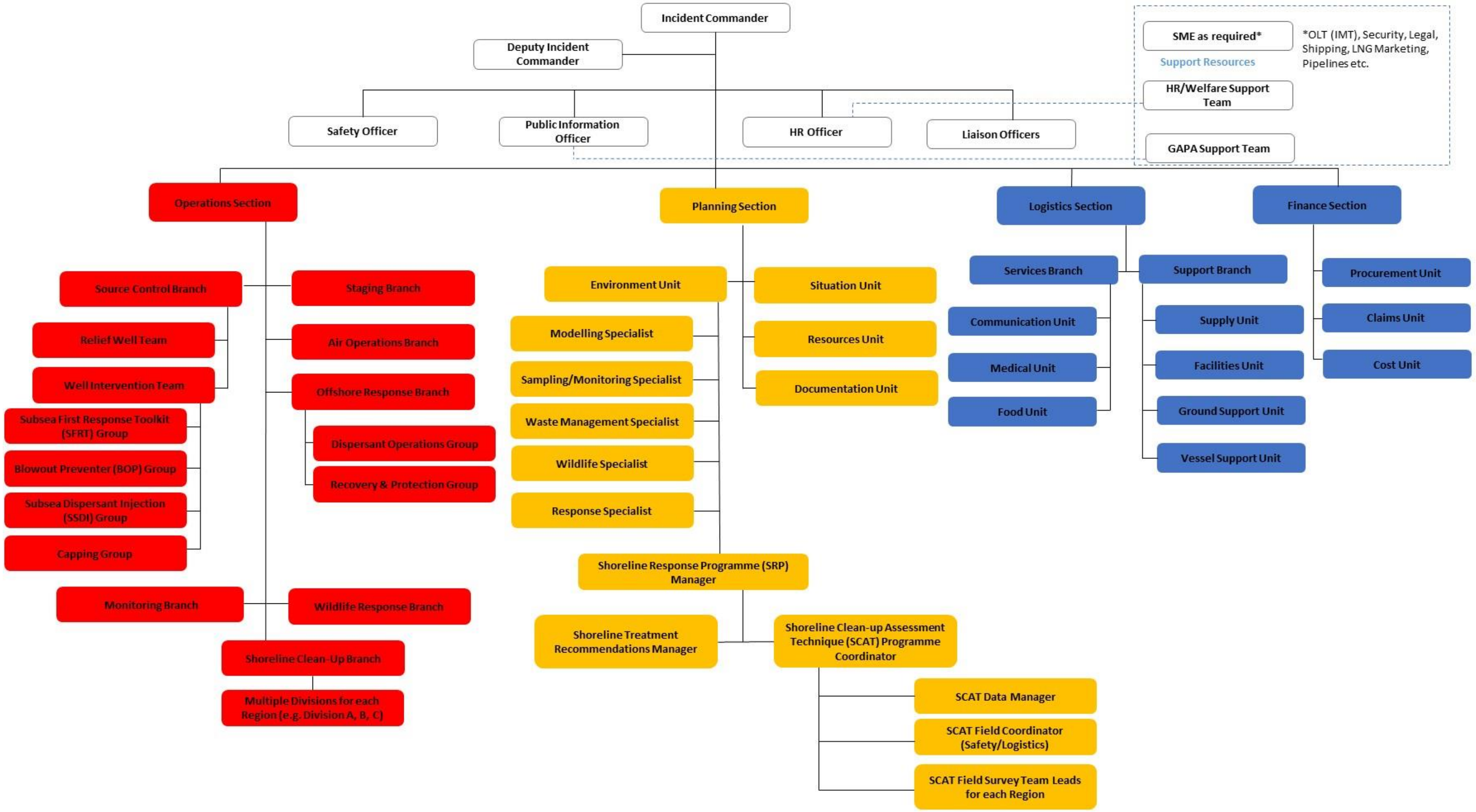


Figure 5-1: Santos incident management team structure

*Note: For a Level 2/3 Petroleum Activity spills whereby DoT is involved as a Control agency, either within a single jurisdiction (State water only spills) or cross-jurisdictional (spills from Commonwealth to State waters), Santos will work in coordination with the DoT in providing spill response capability. Santos' expanded organisational structure for these situations is detailed in **Section 5.2.3**.*

Note: Due to the rig type and BOP location, the Blowout Preventer Group is not expected to be activated.

5.1 Roles and responsibilities

The following tables provide an overview of the responsibilities of the Santos CMT (**Table 5-1**), IMT (**Table 5-2**), and field-based response team members in responding to an incident (**Table 5-3**). The OPEP only provide a brief description of the roles. Full responsibilities checklists/job cards of each role are described in the Incident Command and Management Manual (SO-00-ZF-00025) to support the incident action planning process.

Also provided are the roles and responsibilities of Santos personnel required to work within DoT's organisational structure (**Table 5-5**), where DoT has responsibilities for spill response as a Control Agency, as per DoT's Offshore Petroleum Industry Guidance Note – Marine Oil pollution: Response and Consultation Arrangements.

DoT will provide a Liaison Officer/Duty Incident Commander and the Santos IMT in a coordinated response, as outlined for reference (**Table 5-4**).

The details on IMT resourcing for roles identified in **Table 5-2** and **Table 5-5** are provided in **Appendix J**.

Table 5-1: Roles and responsibilities in the Santos Crisis Management Team

Santos CMT Role	Main Responsibilities
Crisis Management Chair (CEO)	The CM Chair (Santos Chief Executive Officer) is responsible for the following: + Leads crisis management direction + Provides governance and oversight of CMT operations. + Provides enterprise and strategic direction to the CMT for the resolution of the crisis event. + Delegates the CM Leader role and accountability to the appropriate ExCom designee. + Engage with the CM Leader to endorse the crisis resolution plan. + Liaise with the Santos Board and strategic stakeholders. + Provide the full extent of the company's resources to bring about a resolution and recovery from the crisis impact.
CMT Leader/ Duty Manager	The CM Leader is responsible for: + Determine the need for establishing a Level 3 response and for activating the CMT. + Determine which / if any Crisis Management Support Teams (CMST) are mobilised. + Leading the crisis resolution process. + Ensures internal and external notifications to key stakeholders. + Uses the crisis resolution process to determine enterprise level impacts (potential or actual) and strategic objectives. + Ensures a crisis resolution plan is developed and direct the CMT functions to implement strategies, action plans and tasks. + Determines when it is appropriate to conclude the crisis response and stand down all or a portion of the CMT.

Santos CMT Role	Main Responsibilities
CMT Information Management	The CMT Information Managers directly support the CMT as follows: + Support the CMT during crisis management operations. + Sets up the crisis management room, assist with set-up of communications, video conferences and information transfer within the CMT. + Advises on CMT operating processes and available resources. + Assisting with reserving break out rooms for the CMT functions and CMSTs. + Ensuring CMT crisis resolution forms are used and displayed on the monitors. + Provides incident action plan information when an IMT is established. + Monitoring and managing the welfare needs of the CMT.
Crisis Management Advisor	The CMT Management Advisor is responsible for the following: + Provides CMT process guidance and advice to CMT Leader, Function Leads, and CMST. + Supports and facilitates the crisis resolution planning process. + Acts as the liaison between the CMT and IMT. + Work with CMT Information Managers to manage roster and handovers for extended CMT operations. + Schedules and facilitates post crisis debriefs and after-action reviews.: The CMT Management Advisor will support the CMT Leader as follows: + Facilitates CMT activation requirements with the CMT Leader. + Assists the CMT Leader in maintaining an ongoing assessment of incident potential and analysis of stakeholder impacts. + Advises the CMT Leader on CMT structure and requirements for CMST engagement. + Coordinates tasks delegated by CMT Leader. + Provide tools to the CMT Leader for review and crisis assessment meetings.

Santos CMT Role	Main Responsibilities
CMT Core Function Leads	CMT Core Function Leads include Leads for the following areas: + Legal Counsel and Risk, + Environment Health Safety and Security, + COO/VP Division/ Function, + People, + Government and Public Affairs, + Media and Communications The CMT Core Function Leads are responsible for the following: + Participate and contribute to the crisis resolution planning process. + Each Function Lead shall determine critical communications pertaining to their area. + Mobilize and coordinate activities of the function CMST. + Advise the CMT Leader on strategic impacts, threats and mitigation created by the crisis event. + Develop and execute strategies to meet objectives endorsed by the CM Chair. + Provide support and resources via the CMST to divisional IMTs. + Ensures critical actions, decisions or points of strategic criticality are included in the CMT log. + Participates in the crisis management debrief and after-action reviews.

Table 5-2: Roles and responsibilities in the Santos incident management team

Santos Management/ IMT Role	Main Responsibilities
Vice President Offshore (VPO) Upstream WA	+ Depending on the level of the incident, the VPO (and/or their delegate) will act as the primary liaison to the CMT Duty Manager. + On the activation of the IMT, the EVPO is advised by the Incident Commander.
Incident Commander	+ Incident Commander is responsible for the overall management of the incident. Will set response objectives and strategic directions and oversee the development and implementation of Incident Action Plans
Safety Officer	+ Safety Officer is responsible to develop and recommend measure for assuring personnel safety and to assess and/or anticipate hazardous and unsafe situations. Safety Officer may have specialists as necessary.
Public Information Officer	+ Public Information Officer is responsible for developing and releasing information about the incident to media, incident personnel and to appropriate agencies and organisations
Human Resources Officer	+ HR Officer is responsible for advising and assisting the Incident Commander, Command Staff and Section Chiefs on any HR related aspects of an incident.

Santos Management/ IMT Role	Main Responsibilities
Operations Section Chief	+ The Operation Section Chief leads the Operations Section within the IMT and is responsible for the management of all tactical operations directly applicable to the primary assignments. The Operations Section Chief activates and supervises operational elements in accordance with the IAP and directs its execution.
Source Control Branch Director	+ The Source Control Branch Director will be responsible for the implementation of the Source Control Plan (Source Control Planning and Response Guideline - DR-00-OZ-20001). The Source Control Branch Director will activate and supervise source control elements in accordance with the Incident Action Plan and direct its execution.
Relief Well Team Leader	+ The Relief Well Team Leader is responsible for the management and coordination of relief well design and operations. The Relief Well Team Leader coordinates the development of the drilling plans and procedures, secures resources and manages relief well operations to ensure the relief well reaches its target + Create groups as required to acquire relief well MODU, equipment and services and perform detailed relief well planning
Well Intervention Team Leader	+ The Well Intervention Team Leader is responsible for intervention activities including initial site survey, debris clearance, subsea dispersant application, direct BOP intervention and capping stack installation
SFRT Group Leader	+ The SFRT Group Leader is responsible for the activation of the SFRT through AMOSC contract and mobilisation to site. Mobilisation includes sourcing two vessels for SFRT deployment according to vessel criterion in Santos Source Control Planning and Response Guideline. The Group Leader manages and coordinates SFRT functions including debris clearance survey and operations.
BOP Group Leader	+ The BOP Group Leader is responsible for the management and coordination of an intervention on the BOP of the incident well. Based on the initial subsea survey results, the group assess the situation and develops the BOP intervention plans and procedures, secures resources and manages BOP intervention operations with the objective of closing the BOP *(Note: Due to the use of a jack-up MODU and the surface location of the Blowout Preventer, this Group is not expected to be activated for this activity).*
SSDI Group Leader	+ The SSDI Group Leader is responsible for the management and coordination of subsea dispersant operations at or near the source at seabed. The group coordinates application and monitoring plans, prepares procedures, secures resources and approvals, and oversees the application and efficacy of subsea dispersant operations.
Capping Group Leader	+ The Capping Group Leader responsible for the management and coordination of overall capping stack staging, installation plan, and operations. The group begins its task early in the process and continues to operate concurrently with all other source control efforts until the well is secured.

Santos Management/ IMT Role	Main Responsibilities
Staging Branch Director	+ The Staging Branch Director is responsible for supervising the Staging Area Managers as well as coordinating their activities including assigning Staging Area Managers, receiving, maintaining, checking in/out, storing and distributing resources
Air Operations Branch Director	+ The Air Operations Branch Director is ground-based and is primarily responsible for the coordination of the air operations section (ICS 220) of the IAP and for providing logistical support to incident aircraft
Offshore Response Branch Director	+ The Offshore Response Branch Director is responsible for leading the offshore response activities including dispersant application, protection, containment and recovery activities on water. Depending on the size and nature of the incident, various, groups, teams and task forces will be implemented including Dispersants Operations Group, Recovery & Protection Group etc. + The Recovery & Protection Group is responsible for the deployment of containment and diversion/protection booming and managing on water recovery operations in the designated locations in compliance with the IAP + The Dispersant Operations Group is responsible for coordinating all aspects of dispersant operations. For aerial applications, the Group works closely with the Air Operations Branch.
Monitoring Branch Director	+ Working closely with the Environmental Unit, the Monitoring Branch Director will be responsible for implementing the operational and scientific monitoring plans required based on the nature and scale of the incident.
Oiled Wildlife Response Branch Director	+ Working with relevant state authorities, the Oiled Wildlife Response Branch Director will be responsible for implementing the OWR plan for the incident including the deployment of equipment and personnel required.
Shoreline Clean-up Branch Director	+ The Shoreline Clean-up Branch Director is responsible for leading all shoreline response activities working closely with the Shoreline Response Program Manager and shoreline clean-up supervisors and various locations
Planning Section Chief	+ Planning Section Chief will lead the Planning Section within the IMT and is responsible for the collection, evaluation, dissemination and use of incident information and maintaining status of assigned resources.
Situation Unit Leader	+ The Situation Unit Leader is responsible for collecting, processing, and organizing incident information relating to escalation, mitigation or intelligence activities taking place in an incident. The Situation Unit will be responsible for preparing future projections of incident growth, maps, and intelligence information.
Resources Unit Leader	+ The Resource Unit Leader is responsible for maintaining the status of all assigned tactical resources and personnel at an incident. The Resource Unit will oversee the check-in of all tactical resources and personnel, maintaining a status-keeping system indicating current location and status of all the resources.

Santos Management/ IMT Role	Main Responsibilities
Documentation Unit Leader	+ The Documentation Unit Lead us responsible for maintenance of accurate, up-to-date incident files including Incident Action Plans. Incident reports, communication logs, situation status reports etc.
Environment Unit Leader	+ The Environment Unit Leader is responsible for environmental matters associated with the response, including strategic assessment, modelling, surveillance and environmental monitoring and permitting.
Technical Specialists	+ Certain incidents may require the use of Technical Specialists who have specialized knowledge or expertise. Technical Specialists may function within the Planning Section or be assigned wherever their services are required. Santos will activate Technical Specialists, based on the requirements of the incident, through a range of arrangements and this may include, Modelling Specialist, Operational/Scientific Monitoring Specialist, Response Technology Specialist, Waste Management Specialist etc.
Shoreline Response Programme (SRP) Manager	+ The SRP Manager reports to the Environment Unit Leader and is responsible for managing shoreline response + Provides input to Planning and Operations Section Chiefs on shoreline response program to minimize shoreline impacts and Shoreline Clean-up Assessment Technique (SCAT) program
SCAT Programme Coordinator	+ SCAT Program Coordinator is the primary point of contact, through SRP Manager, within the IMT for all SCAT activities + SCAT Program Coordinator act as the project manager for SCAT program and will design and direct the SCAT program for any incidents + SCAT Program Coordinator will implement and manage the day-today activities for the SCAT program including establishing good management practices and safety protocols for the field teams, chairing SCAT Field Survey Team briefings and debriefings and producing daily and weekly summaries of field reports
SCAT Field Coordinator	+ SCAT Field Coordinator works with SCAT Program Coordinator to develop daily missions and rolling strategy for the field teams and to provide the necessary logistics and equipment support as required
SCAT Data Manager	+ SCAT Data Manager reports to the SCAT Program Coordinator and is responsible for processing field data, quality assurance, data storage and dissemination within the IMT, and for providing the SCAT Field Survey Teams with the maps and data required to conduct their missions.

Santos Management/ IMT Role	Main Responsibilities
Shoreline Treatment Recommendations (STR) Manager	+ The STR Manager is responsible for the preparation of the Shoreline Treatment Recommendations (STRs) + STR Manager will work with the Environment Unit to obtain reconnaissance information to assess priority areas for initial SCAT surveys and gain approval for land access where appropriate + STR Manager ensures all approvals are obtained (e.g. concerning any endangered species, cultural, historical resources etc.) prior to undertaking shoreline activities + STR Manager will work with the Environment Unit's Technical Specialists, subject matter experts and stakeholders to ensure that their requirements and constraints are incorporated into shoreline treatment recommendations + STR Manager will work with the Operations Section to obtain advice on the feasibility, practicality and effectiveness of potential treatment strategies and tactics + STR Manager will track the progress of approved STRs to generate and update progress reports
Logistics Section Chief	+ Logistics Section Chief is responsible for providing facilities, services and materials in support of the incident. The Logistics Section Chief participates in the development and implementation of the Logistics Section of the IAP.
Services Branch Director	+ Service Branch Director, when activated is under the supervision of the Logistics Section Chief and is responsible for the management of all service activities for the incident including the operations of the Communications, Medical and Food Units
Support Branch Director	+ Support Branch Director, when activated, is under the supervision of Logistics Section Chief and is responsible for the development and implementation of logistics plan in support of the IAP. The Support Branch supervises the operations of the Supply, Facilities, Ground Support and Vessel Support Units.
Finance Section Chief	+ Finance Section Chief is responsible for all the financial, administrative and cost analysis aspects of the incident and for supervising members of the Finance Section
Procurement Unit Leader	+ Procurement Unit Leader us responsible for administering all financial matters pertaining to vendor contracts and leases. The Procurement Unit Leader will execute all procurements in accordance with the policies and procedures of Santos
Claims Unit Leader	+ The Claims Unit Leader is responsible for the management and direction of all administrative matters pertaining to compensation and claims related matters for any incident
Cost Unit Leader	+ The Cost Unit Leader is responsible for collecting all cost data and providing cost estimated and any cost saving recommendations for the incident

Table 5-3: Roles and responsibilities in the field-based response team

Field-Based Position	Main Responsibilities
On-Scene Commander (MODU)	+ Assess facility-based situations. + Be single point of communications between facility/site and IMT. + Communicate the incident response actions and delegates actions to the Incident Commander. + Manage the incidents in accordance with MODU Emergency Response Plan. + Coordinate medical evacuations as required. + Refer to the MODU Emergency Response Plan for detailed descriptions of roles and responsibilities.
Company Site Representative	+ Notify the Perth based Incident Commander of oil spills. + Coordinate onsite monitoring of oil spill and ongoing communication with Incident Commander.
Off-Asset On-Scene Commander	+ Coordinate the field response as outlined in the Incident Action Plan developed by the IMT. + Command an FOB for the coordination of resources mobilised to site.
Off-Asset Oil Spill Response Teams	+ Respond to oil spills at sea to minimise the impacts to as low as reasonably practical. + Refer to activity -specific Oil Spill Contingency Plans and OPEPs for detailed descriptions of roles and responsibilities within the Off-Asset Oil Spill Response Team.
Source Control Branch	+ Respond to incidents involving well loss of containment to stop the flow of oil to sea. + Refer to the Santos Source Control Planning and Response Guideline (DR-00-OZ-20001) for detailed descriptions of roles and responsibilities within the Source Control Branch.
Wildlife Response Branch	+ Respond to oiled wildlife incidents to minimise the impacts to wildlife. + Refer to the Western Australia Oiled Wildlife Response Plan for detailed descriptions of roles and responsibilities within the Oiled Wildlife Response Team.
Monitoring Branch	+ Monitor the impacts and recovery to sensitive receptors from an oil spill and associated response actions. + Refer to the Oil Spill Scientific Monitoring Standby and Response Manual (EA-00-RI-10162) for detail on Scientific Monitoring Team roles and responsibilities.

Table 5-4: Department of Transport roles embedded within Santos' crisis/incident management team

DoT roles embedded within Santos' CMT/IMT	Main Responsibilities
DoT Liaison Officer (prior to DoT assuming role of Control agency) **Deputy Incident Controller – State Waters (after DoT assumes role of Control agency)**	+ Facilitate effective communications between DoT's State Marine Pollution Coordinator (SMPC) the Incident Controller and Santos' appointed CMT Leader/Incident Commander. + Provide enhanced situational awareness to DoT of the incident and the potential impact on State waters. + Assist in the provision of support from DoT to Santos. + Facilitate the provision of technical advice from DoT to Santos' Incident Commander as required.
Media Liaison Officer	+ Provide a direct liaison between the Santos Media team and DoT IMT Media team. + Facilitate effective communications and coordination between the Santos and DoT media teams. + Assist in the release of joint media statements and conduct of joint media briefings. + Assist in the release of joint information and warnings through the DoT Information & Warnings team. + Offer advice to the Santos Media Coordinator on matters pertaining to DoT and wider Government media policies and procedures.

Table 5-5: Santos personnel roles embedded within the State Maritime Environmental Emergency Coordination Centre/Department of Transport incident management team

Santos roles embedded within the State MEECC/ DoT IMT	Main Responsibilities
CMT Liaison Officer[3]	+ Provide a direct liaison between the Santos CMT and the State MEECC. + Facilitate effective communications and coordination between the Santos CMT Leader and the SMPC. + Offer advice to SMPC on matters pertaining to Santos crisis management policies and procedures
Deputy Incident Controller	+ Provide a direct liaison between the DoT IMT and the Santos IMT. + Facilitate effective communications and coordination between the Santos Incident Commander and the DoT Incident Controller. + Offer advice to the DoT Incident Controller on matters pertaining to the Santos incident response policies and procedures. + Offer advice to the Safety Coordinator on matters pertaining to Santos safety policies and procedures particularly as they relate to Santos employees or contractors operating under the control of the DoT IMT.
Deputy Intelligence Officer	+ As part of the DoT Intelligence Team, assist the Intelligence Officer in the performance of their duties in relation to situation and awareness. + Facilitate the provision of relevant modelling and predications from the Santos IMT. + Assist in the interpretation of modelling and predictions originating from the Santos IMT. + Facilitate the provision of relevant situation and awareness information originating from the DoT IMT to the Santos IMT. + Facilitate the provision of relevant mapping from the Santos IMT. + Assist in the interpretation of mapping originating from the Santos IMT. + Facilitate the provision of relevant mapping originating from the Santos IMT.

[3] The role described as the *Santos Offshore Liaison Officer* in **Figure 5-2**.

Santos roles embedded within the State MEECC/ DoT IMT	Main Responsibilities
Deputy Planning Officer	+ As part of the DoT Planning Team, assist the Planning Officer in the performance of their duties in relation to the interpretation of existing response plans and the development of incident action plans and related sub-plans + Facilitate the provision of relevant IAP and sub-plans from the Santos IMT. + Assist in the interpretation of the Santos OPEP from Santos. + Assist in the interpretation of the Santos IAP and sub-plans from the Santos IMT. + Facilitate the provision of relevant IAP and sub-plans originating from the DoT IMT to the Santos IMT. + Assist in the interpretation of Santos' existing resource plans. + Facilitate the provision of relevant components of the resource sub-plan originating from the DoT IMT to the Santos IMT. (Note this individual must have intimate knowledge of the relevant Santos OPEP and planning processes).
Environment Support Officer	+ As part of the Intelligence Team, assist the Environment Coordinator in the performance of their duties in relation to the provision of environmental support into the planning process + Assist in the interpretation of the Santos OPEP and relevant TRPs. + Facilitate in requesting, obtaining and interpreting environmental monitoring data originating from the Santos IMT. + Facilitate the provision of relevant environmental information and advice originating from the DoT IMT to the Santos IMT.

Santos roles embedded within the State MEECC/ DoT IMT	Main Responsibilities
Deputy Public Information Officer[4]	+ As part of the Public Information Team, provide a direct liaison between the Santos Media team and DoT IMT Media team. + Facilitate effective communications and coordination between Santos and DoT media teams. + Assist in the release of joint media statements and conduct of joint media briefings. + Assist in the release of joint information and warnings through the DoT Information & Warnings team. + Offer advice to the DoT Media Coordinator on matters pertaining to Santos media policies and procedures. + Facilitate effective communications and coordination between Santos and DoT Community Liaison teams. + Assist in the conduct of joint community briefings and events. + Offer advice to the DoT Community Liaison Coordinator on matters pertaining to Santos community liaison policies and procedures. + Facilitate the effective transfer of relevant information obtained from the Contact Centre to the Santos IMT.
Deputy Logistics Officer	+ As part of the Logistics Team, assist the Logistics Officer in the performance of their duties in relation to the provision of supplies to sustain the response effort. + Facilitate the acquisition of appropriate supplies through Santos' existing OSRL, AMOSC and private contract arrangements. + Collects Request Forms from DoT to action via the Santos IMT. (Note this individual must have intimate knowledge of the relevant Santos logistics processes and contracts).
Deputy Waste Management Coordinator	+ As part of the Operations Team, assist the Waste Management Coordinator in the performance of their duties in relation to the provision of the management and disposal of waste collected in State waters. + Facilitate the acquisition of appropriate services and supplies through Santos' existing private contract arrangements related to waste management; and Collects Waste Collection Request Forms from DoT to action via the Santos IMT.

[4] In the event of an incident, access to media and communications response strategy and a comprehensive stakeholder list inclusive of all potentially relevant stakeholders, including indigenous organisations are contained via Santos internal intranet site for use by CMT/IMT members.

Santos roles embedded within the State MEECC/ DoT IMT	Main Responsibilities
Deputy Finance Officer	+ As part of the Finance Team, assist the Finance Officer in the performance of their duties in relation to the setting up and payment of accounts for those services acquired through Santos' existing OSRL, AMOSC and private contract arrangements. + Facilitate the communication of financial monitoring information to Santos to allow them to track the overall cost of the response. + Assist the Finance Officer in the tracking of financial commitments through the response, including the supply contracts commissioned directly by DoT and to be charged back to Santos.
Deputy Operations Officer	+ As part of the Operations Team, assist the Operations Officer in the performance of their duties in relation to the implementation and management of operational activities undertaken to resolve an incident. + Facilitate effective communications and coordination between the Santos Operations Section and the DoT Operations Section. + Offer advice to the DoT Operations Officer on matters pertaining to Santos incident response procedures and requirements. + Identify efficiencies and assist to resolve potential conflicts around resource allocation and simultaneous operations of Santos and DoT response efforts.
Deputy Division Commander (FOB)	+ As part of the Field Operations Team, assist the Division Commander in the performance of their duties in relation to the oversight and coordination of field operational activities undertaken in line with the IMT Operations Section's direction. + Provide a direct liaison between Santos' Forward Operations Base/s (FOB/s) and the DoT FOB. + Facilitate effective communications and coordination between Santos FOB Operations Commander and the DoT FOB Operations Commander. + Offer advice to the DoT FOB Operations Commander on matters pertaining to Santos incident response policies and procedures. + Assist the Safety Coordinator deployed in the FOB in the performance of their duties, particularly as they relate to Santos employees or contractors. + Offer advice to the Senior Safety Officer deployed in the FOB on matters pertaining to Santos safety policies and procedures.

5.2 Regulatory arrangements and external support

Santos has contracts in place enabling access to Oil Spill Response Organisations (OSROs). OSROs have put specific measures in place to ensure that they are able to continue to meet their commitments to members. This support can be provided directly or remotely to aid the IMT and/or IRT.

5.2.1 Australian Marine Oil Spill Centre

Santos is a Participating Company of AMOSC and as such has access to AMOSC's Level 2/3 equipment and personnel as outlined in the AMOSPlan.

AMOSC has contracts with all its member companies to enable the immediate release of Core Group personnel to be made available for any Santos requirements, as outlined in Santos' *Master Service Contract* and *Principle and Agency Agreement* with AMOSC.

The mutual aid arrangements that AMOSC operates under are collaborated under the AMOSPlan. This provides the mechanism for members of AMOSC to access oil spill response capability of other members. To further enhance the mutual aid arrangements, Santos, BHP, Chevron, Woodside and Jadestone have signed a Memorandum of Understanding (MoU) that defines the group's mutual aid arrangements. Under this MoU, Santos, BHP, Chevron, Woodside and Jadestone have agreed to use their reasonable endeavours to assist in the provision of emergency response services, personnel, consumables and equipment.

5.2.2 Australian Maritime Safety Authority

AMSA is the designated Control Agency for oil spills from vessels within Commonwealth jurisdiction.

Upon notification of an incident involving a ship, AMSA will assume control of the incident and response in accordance with AMSA's Marine Pollution Response Plan. AMSA's Marine Pollution Response Plan is the operational response plan for the management of ship-source incidents. AMSA is to be notified immediately of all ship-source incidents through RCC Australia (Santos Incident Response Telephone Directory (SO-00-ZF-00025.020)).

An MoU has been established between Santos and AMSA, outlining respective roles and responsibilities when responding to vessel-sourced marine pollution incidents and petroleum activity related marine pollution incidents.

AMSA manages the NatPlan, Australia's key maritime emergency contingency and response plan. All resources under the NatPlan are available to Santos through request to AMSA under the arrangements of the MoU.

For any oil pollution event, Santos agrees to notify AMSA immediately in the interests of facilitating the most efficient and effective response to the incident.

5.2.3 Western Australian Department of Transport

In the event that a Level 2/3 Marine Oil Pollution Incident enters, or has potential to enter, State waters, the Hazard Management Agency (HMA) (DoT Director General or proxy) will take on the role as the SMPC and DoT will take on the role as a Control Agency.

For any oil spill entering or within WA State waters/shorelines, DoT as the Control Agency is the ultimate decision maker regarding identification and selection of protection priorities. DoT will utilise their internal processes which typically includes the following:

+ Evaluation of situational awareness information, including all surveillance, monitoring and visualisation data provided by the Titleholder;
+ Evaluation of resources at risk including use of the WA Oil Spill Response Atlas and any other relevant WA/Commonwealth government databases or other information sources;

+ Evaluate shoreline types, habitat types and seasonality of environmental, socio-economic and cultural values and sensitivities;
+ Consultation with the State Environmental Scientific Coordinator and other relevant State and Federal government departments with environmental responsibilities;
+ Consultation with other relevant oil spill agencies, including the AMSA Environment, Science and Technology network or any other experts as necessary; and
+ All information is utilised in a NEBA/SIMA type process, to determine protection priorities and response strategies.

DoT will adjust/amend their internal processes to suit the spill situation at the time.

Santos will notify the DoT Maritime Environmental Emergency Response (MEER) unit as soon as reasonably practicable (within 2 hours of spill occurring) of such an incident. On notification, the HMA will activate their MEECC and the DoT IMT.

For facility oil spills entering State waters (i.e., across jurisdictions) both Santos and DoT will be Control Agencies. Santos will work in partnership with DoT during such instances, as outlined within the DoT's Offshore Petroleum Industry Guidance Note – Marine Oil Pollution: Response and Consultation Arrangements Available online: DoT's Offshore Petroleum Industry Guidance Note – Marine Oil pollution: Response and Consultation Arrangements.

Santos will conduct initial response actions in State waters as necessary in accordance with its OPEP and continue to manage those operations until formal handover of incident control is completed. Appendix 1 within DoT's Offshore Petroleum Industry Guidance Note – Marine Oil Pollution: Response and Consultation Arrangements provides a checklist for formal handover.

For a cross-jurisdictional response, there will be a Lead IMT (DoT or Santos) for each spill response activity, with DoT's control resting primarily for State waters activities.

Appendix 2 within DoT's Offshore Petroleum Industry Guidance Note – Marine Oil Pollution: Response and Consultation Arrangements provides guidance on the allocation of a Lead IMT to response activities for a cross jurisdictional spill.

To facilitate coordination between DoT and Santos during a cross jurisdictional response, a Joint Strategic Coordination Committee will be established. The Joint Strategic Coordination Committee will be jointly chaired between the SMPC and a nominated senior representative of Santos and will ensure alignment of objectives and provide a mechanism for de-conflicting priorities and resourcing requests.

For a cross jurisdictional response Santos will be responsible for ensuring adequate resources are provided to DoT as Control Agency, initially 11 personnel to fill roles in the DoT IMT or FOB (refer **Section 5.1**) and operational personnel to assist with those response strategies where DoT is the Lead IMT. Concurrently DoT will also provide two of their personnel to the Santos IMT as described in **Table 5-4**. Santos' CMT Liaison Officer and the Deputy Incident Controller are to attends the DoT Fremantle ICC as soon as possible after the formal request has been made by the SMPC. It is an expectation that the remaining initial cohort will attend the DoT Fremantle ICC no later than 8am on the day following the request being formally made to Santos by the SMPC.

Figure 5-2 shows the organisational structure of Santos incident management personnel within Santos IMT and embedded within DoT's MEECC/IMT.

Figure 5-3 shows the overall cross jurisdictional organisational structure referenced from the SHP-MEE.

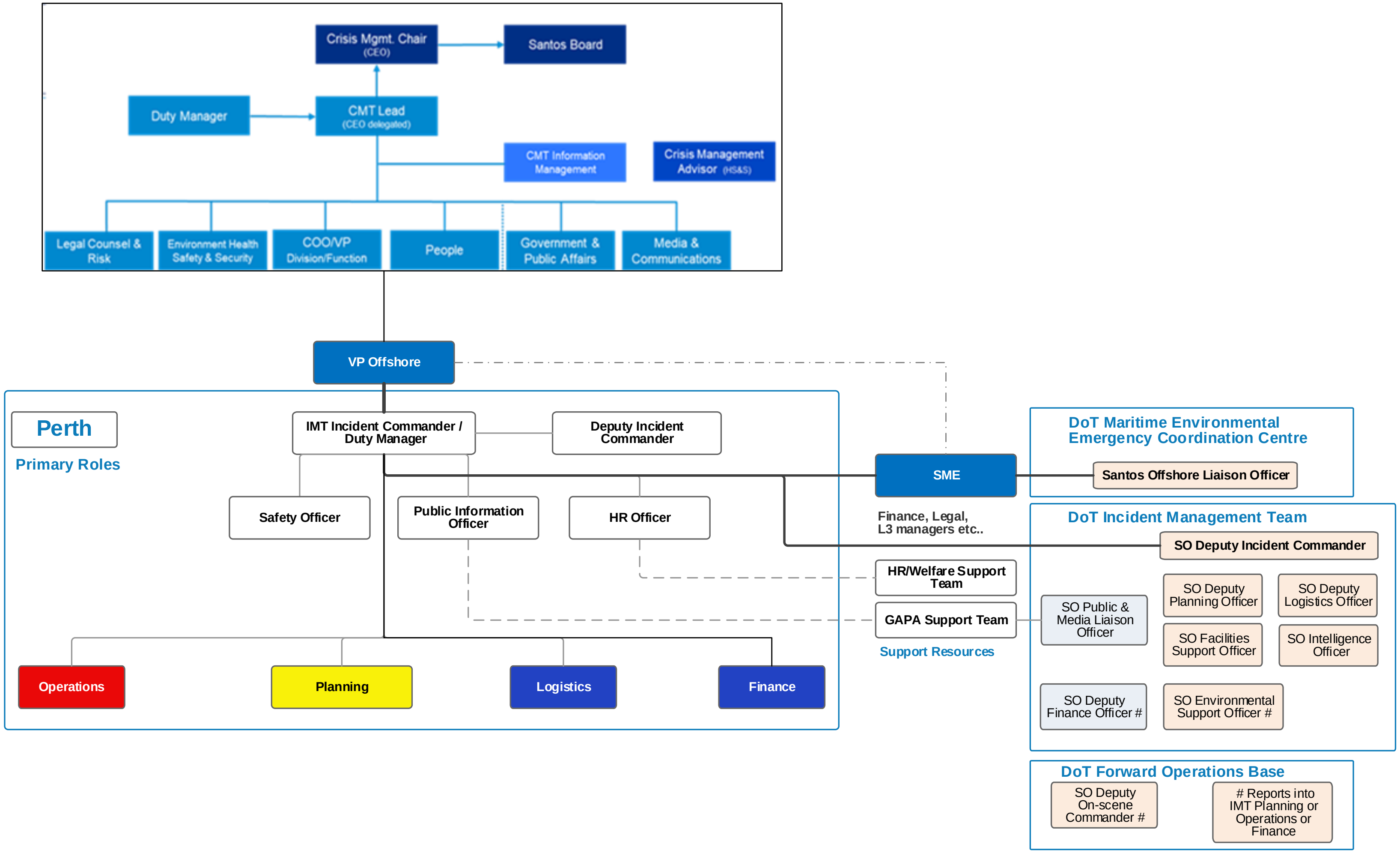


Figure 5-2: Santos cross jurisdictional incident management structure for Commonwealth waters Level 2/3 facility oil pollution incident entering State waters

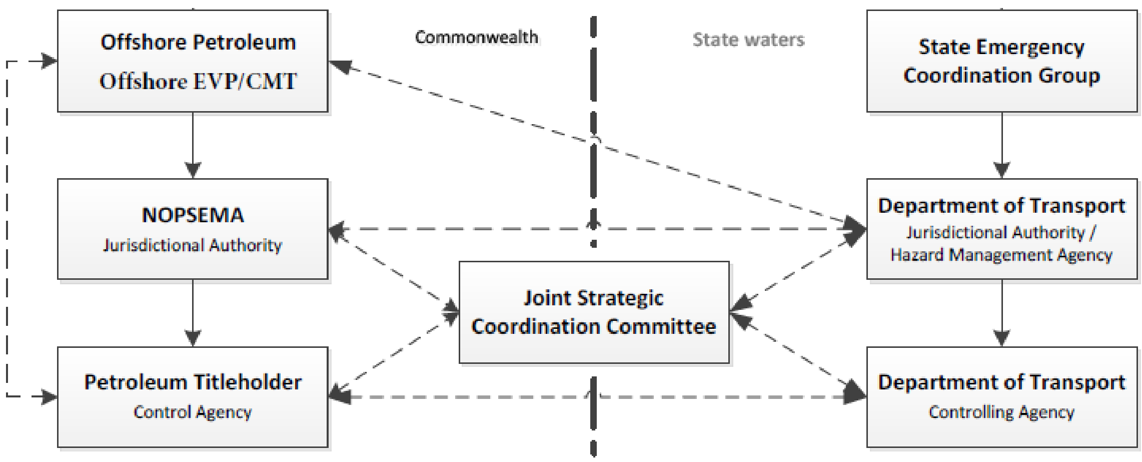


Figure 5-3: Overall control and coordination structure for offshore petroleum cross-jurisdiction incident

5.2.4 Western Australian Department of Biodiversity, Conservation and Attractions (DBCA)

The Western Australian Department of Biodiversity, Conservation and Attractions (DBCA) has responsibilities associated with wildlife and activities in national parks, reserves and State marine parks. The *Biodiversity Conservation Act 2016* (WA) is the legislation that provides DBCA with the responsibility and Statutory Authority to treat, protect and destroy wildlife. In State waters, DBCA is the Jurisdictional Authority for Oiled Wildlife Response (OWR), providing advice to the Control Agency (DoT). The role of DBCA in an OWR is outlined in the Western Australian Oiled Wildlife Response Plan (WAOWRP) and regional sub-plans.

For a Level 2/3 petroleum spill that originates within or moves into State waters, DoT will be the Control Agency responsible for overall command of an oiled wildlife response. Santos will provide all necessary resources (equipment and personnel primarily through AMOSC membership) to DoT to facilitate this response.

For matters relating to environmental sensitivities and scientific advice in State waters DBCA may provide an Environmental Scientific Coordinator (ESC) to support the SMPC and/or DoT Incident Controller.

This may include advice on priorities for environmental protection, appropriateness of proposed response strategies and the planning and coordination of scientific monitoring for impact and recovery assessment.

5.2.4.1 Use of Dispersant in State Waters

The ESC is involved in the consent process for the use of dispersant in State waters and will seek advice from the DoT MEER unit on this matter. During a response to either a shipping or offshore petroleum activity marine oil pollution incident in State waters, regardless of source, the use of dispersants requires the written consent of the HMA. Where the application of dispersant in adjacent waters could impact State waters, the HMA requests early notification. This notification is to be provided to DoT through the HMA (or SMPC if activated).

In seeking the consent of the HMA/SMPC to use dispersants in State waters, the Incident Commander is expected to have had the option assessed by a panel formed within the IMT. This panel should be chaired by the Incident Commander and include the participation of the ESC. The involvement of the CSIRO or other SMEs on the panel should also be considered. In formulating its position on the potential use of dispersants, the panel is to use the decision-making process outlined in the *AMSA Protocol for Obtaining Approval for the Application of Oil Spill Control Agents to Oil at Sea or on Shorelines*. This process must be documented, and a record retained within the IMT.

The HMA/SMPC will confirm the recommendation of the ESC, who may grant or refuse consent for the use of dispersants in State waters. In granting consent, the HMA/SMPC may attach conditions to the consent. It should be noted that the consent can be removed by the HMA/SMPC at any time. It should also be noted that other restrictions on dispersant use (as described in **Table 13-3** and **Table 13-6**), may still apply.

The ESC can also advise on where AMSA National Plan Dispersant Effectiveness Test Kits can be located, which could be utilised in addition to Santos dispersant testing resources (refer to **section 13.4.2**).

5.2.5 Oil Spill Response Limited

Through an associate membership, Santos has access to spill response services from OSRL with offices in Perth, Singapore, UK and at other various locations around the. In the event of a Level 2/3 response, Santos could access OSRL's international personnel, equipment and dispersants, primarily through OSRL's Singapore stockpile, to supplement resources available within Australia. Santos may also call on OSRL for technical services to support its IMT.

Response equipment and personnel are allocated on a 50% of inventory basis under OSRL's Service Level Agreement. Santos also has access to additional dispersant stockpiles held by OSRL through a Global Dispersant Stockpile Supplementary Agreement.

5.2.6 The Response Group

The Response Group (TRG) is an international provider of crisis management and emergency response services including oil spill response. TRG are available 24/7 and can provide personnel for emergency response support. Arrangements with TRG to provide responders will be in place prior to the activity and will be maintained throughout the activity.

5.2.7 Department of Foreign Affairs and Trade

In the event of a spill predicted to migrate into neighbouring countries Exclusive Economic Zones, Santos will notify the Department of Foreign Affairs and Trade (DFAT) who will in turn notify the affected government(s) and engage the preferred methods for Santos to respond in order to minimise the impacts to ALARP. In most cases, NOPSEMA, DISER and DFAT will form an inter-agency panel; the Australian Government Control Crisis Centre, who may request AMSA to coordinate the response operations across the trans-national boundary. Santos remains willing to respond as per the direction of the affected government(s) and designated Control Agency, following approvals established between DFAT and the affected countries government.

5.2.8 Department of Industry, Science, Energy and Resources

The Department of Industry, Science, Energy and Resources (DISER) will be the lead Commonwealth Agency for the provision of strategic oversight and Commonwealth government support to a significant offshore petroleum incident (including oil spill incidents). DISER will be notified by NOPSEMA of a significant oil pollution incident and under the Offshore Petroleum Incident Coordination Framework will stand up the Offshore Petroleum Coordination Committee as the mechanism to provide Commonwealth strategic advice and support to the incident. To facilitate information between the Petroleum Titleholder IMT and Offshore Petroleum Incident Coordination Committee, Liaison Officer/s will be deployed from DISER to the Petroleum Titleholders IMT.

For incidents that are classified at a greater level than Significant (i.e., Crisis level), a whole of government crisis committee will be formed under the Australian Government Crisis Management Framework to provide strategic advice and support and the Offshore Petroleum Incident Coordination Committee will not be convened, although DISER will remain as the lead agency.

5.3 External plans

Information from the following external documents have been used or referred to within this Plan:

+ AMOSPlan – Australian Industry Cooperative Spill Response Arrangements:
  - Details the cooperative arrangements for response to oil spills by Australian oil and associated industries.
+ Offshore Petroleum Incident Coordination Framework – provides overarching guidance on the Commonwealth Government's role and responsibilities in the event of an offshore petroleum incident in Commonwealth waters.
+ NatPlan – National Plan for Maritime Environmental Emergencies and National Marine Oil Spill Contingency Plan:
  - Sets out national arrangements, policies and principles for the management of maritime environmental emergencies. The plan provides for a comprehensive response to maritime environmental emergencies regardless of how costs might be attributed or ultimately recovered.
+ HazPlan – SHP-MEE – Western Australia State Hazard Plan for Maritime Environmental Emergencies:
  - Details the management arrangements for preparation and response to a marine pollution incident occurring in State waters.
+ DoT Oil Spill Contingency Plan:
  - Defines the steps required for the management of marine oil pollution responses that are the responsibility of the DoT.
  - DoT's Offshore Petroleum Industry Guidance Note – Marine Oil Pollution: Response and Consultation Arrangements (available online: DoT's Offshore Petroleum Industry Guidance Note – Marine Oil pollution: Response and Consultation Arrangements).
+ Shipboard Oil Pollution Emergency Plans:
  - Under International Convention for the Prevention of Pollution from Ships (MARPOL) Annex I requirements, all vessels of over 400 gross tonnage are required to have a current SOPEP. The SOPEP includes actions to be taken by the crew in the event of an oil spill including steps taken to contain the source with equipment available onboard the vessel.
+ Western Australia Oiled Wildlife Response Plan:
  - Defines the steps, personnel, equipment and infrastructure required for the management of wildlife in an oil pollution response. Each region has a Regional Oiled Wildlife Response Plan that gives further details on sensitivities and available resources. The Pilbara Region Oiled Wildlife Response Plan is the relevant regional plan for OWR associated with Bedout Multi-Well Drilling activities.

- OSRL Associate Agreement:
  - Defines the activation and mobilisation methods of OSRL spill response personnel and equipment allocated under contract.
- Australian Government Coordination Arrangements for Maritime Environmental Emergencies:
  - Provides a framework for the coordination of Australian Government departments and agencies in response to maritime environmental emergencies.

5.4 Cost recovery

As required under Section 571(2) of the *OPGGS Act 2006*, Santos has financial assurances in place to cover any costs, expenses and liabilities arising from carrying out its Petroleum Activities, including major oil spills. This includes costs incurred by relevant Control agencies (e.g. DoT) and third-party spill response service providers.

5.5 Training and exercises

In order to refresh IMT roles and responsibilities and provide familiarisation with OPEP processes and arrangements, IMT workshops are conducted as per the Santos Offshore Division Incident and Crisis Management Training and Exercise Plan (SO-92-HG-10001).

To familiarise the IMT with functions and processes, an OPEP Desktop and Activation Exercise is undertaken as per the Santos Offshore Division Incident and Crisis Management Training and Exercise Plan (SO-92-HG-10001). Exercise planning takes into consideration virtual/remote access requirements and government mandate boarder restrictions (e.g. Covid-19). All workshops and exercises undertaken are recorded in the Santos EHS Toolbox, with the key recommendations recorded and tracked.

5.5.1 Incident management team training and exercises

Santos provides training to its personnel to fill all required positions within the IMT.

Competency is maintained through participation in regular response exercises and workshops. Exercise and training requirements for Santos' IMT members are summarised in **Table 5-6**.

Table 5-6: Training and exercise requirements for incident management team positions

IMT Role	Exercise	Training
Incident Commander Operations Section Chief / Source Control Branch Director	One Level 3 exercise annually or two Level 2 desktop exercises annually[5]	+ PMAOMIR320 + PMAOMIR418 + AMOSC – IMO3 Oil Spill Command & Control
Planning Section Chief Logistics Section Chief Environment Unit Leader		+ PMAOMIR320 + AMOSC – IMO2 Oil Spill Management Course
Safety Officer Supply Unit Leader GIS Team Leader Data Manager[6] HR Officer		+ PMAOMIR320 + AMOSC – Oil Spill Response Familiarisation Training
Relief Well Team Leader Well Intervention Team Leader		+ Drilling Well Control accredited training through International Well Control Forum (IWCF) + Level 4 (Well Site Supervisor Training)

5.5.2 Oil spill responder training

Santos has an internal capability of trained oil spill responders who can be deployed in the field in a spill response and has access to external, trained spill responder resources (**Table 5-7**).

[5] All IMT members are required to participate in at least one Level 3 exercise every two years.

[6] Data Manager is an administrative support role, not an IMT role, but is included here for completeness

Table 5-7: Spill responder personnel resources

Responder	Role	Training	Available Number
Santos AMOSC Core Group Responders	Santos personnel trained and competency assessed by AMOSC as the AMOSC Core Group. Deployed by IMT for spill response operations.	AMOSC Core Group Workshop (refresher training undertaken every two years). AMOSC – IMO1 Oil Spill Operators Course	12
Santos Facility Emergency Response Teams	Present at Devil Creek, Varanus Island and Ningaloo Vision Facilities for first strike response to incidents.	Internal Santos training and exercises as defined in each facility's Emergency Response Plan OSC to have AMOSC – Oil Spill Response Familiarisation Training.	One Emergency Response (ER) team per operational facility per shift
Santos Aerial Observers	Undertake aerial surveillance of spill. Deployed by IMT in the aerial surveillance aircrafts.	AMOSC – Aerial Surveillance Course (refresher training undertaken tri-annually).	7
AMOSC Core Group Oil Spill Responders	Industry personnel as the AMOSC Core Group, available to Santos under the AMOSPlan. For providing incident management (IMT) and operations (field response) assistance.	AMOSC Core Group Workshop (refresher training undertaken every two years). AMOSC – IMO1 Oil Spill Operators Course and/or IMO2 Oil Spill Management Course	As defined in Core Group Member Reports [7] Target to maintain at least 84 members (Ref: AMOSC Core Group Program and Policies)
OSRL Oil Spill Response Personnel	Oil Spill Response Ltd professionals, providing technical, incident management and operational advice and assistance available under Santos-OSRL contract.	As per OSRL training and competency matrix.	18 responders guaranteed 80 dedicated responders available approved on a case-by-case basis
TRG Response Personnel	Emergency response personnel provided by arrangement with Santos	As per TRG training and competency matrix	60

[7] An average of 47 personnel plus 16 AMOSC staff members available as of September 2021.

Responder	Role	Training	Available Number
AMOSC Staff	Professionals, providing technical, incident management and operational advice and assistance available under Santos-AMOSC contract.	As per AMOSC training and competency matrix.	16
Santos Source Control Personnel	Management and coordination of source control strategies including relief well drilling and subsea intervention	Internal Santos training and exercises. IWCF Level 4 certification	60
Oiled Wildlife Response Roles (Level 6)	Refer **Section 16**.		
Monitoring Service Provider: Monitoring Coordination Team (MCT) and Scientific Monitoring Plan Teams	Monitoring Coordination Team (MCT) Scientific Monitoring Plan Teams: Technical Advisers Field Team Leader Field Team Member	As defined in the Oil Spill Scientific Monitoring Standby and Response Manual (EA-00-RI-10162)	Capability defined in Monthly Capability Reports. MCT – five personnel Scientific Monitoring Plan Teams 12+ per team
Level 1 Oiled Wildlife Responders (Workforce Hire)	Provide oiled wildlife support activities under supervision.	No previous training required; on the job training provided.	Nominally over 1,000
Shoreline clean-up personnel (Workforce Hire)	Manual clean-up activities under supervision.		

In addition to the resources listed in **Table 5-7**, the following resources are available for spill response and may be activated by the relevant Control Agency:

+ National Plan: National Response Team – Trained oil spill response specialists, including aerial observers, containment and recovery crews, and shoreline clean-up personnel, deployed under the direction of AMSA and the IMT in a response. The National Response Team is trained and managed in accordance with the National Response Team Policy, approved by the National Plan Strategic Coordination Committee (AMSA, 2013b).
+ WA State Hazard Plan for Maritime Environmental Emergencies (SHP-MEE): State Response Team (SRT)– Oil pollution response team available to assist under the jurisdiction of the DoT. SRT members remain trained and accredited in line with the State Hazard Plan (SHP-MEE) requirements.

In the event of a spill, the trained spill responders listed in **Table 5-7** would be required to undertake various roles in key spill response operations, including operational monitoring, shoreline protection, shoreline clean-up, oiled wildlife response and scientific monitoring.

In the event of a spill, Team Leader roles for protection and deflection and shoreline clean-up would be filled through Santos' AMOSC Core Group Responders and then industry Core Group Responders.

5.6 Response testing arrangements and audits

Santos has oil spill response testing arrangements in place in accordance with the Santos Offshore Oil Spill Response Readiness Guideline (SO-91-OI-20001) which provides a process for continual monitoring of OSRO capability. This also includes regular oil spill response equipment inventory checks from the various sources. Testing of key response provider arrangements may be done as part of larger exercises or as standalone tests where the capability and availability of resources through the response provider are assessed against the performance requirement.

5.6.1 Testing Arrangements

Not all spill preparedness and response arrangements will be tested simultaneously. The frequency of testing will relate to the potential spill level, spill risk and complexity of response.

Santos employs a range of tests to ensure that the various response arrangements function as required. These tests include;

1. Contract/Plan Review
2. Audit
3. Notification/Communication Check
4. Desktop Exercise
5. Deployment Exercise
6. Level 2/3 IMT Exercise

The above objectives are set for each of the tests identified for various response arrangements and the effectiveness of the response arrangements against these objectives are examined using pre-identified Key Performance Indicators (KPI). The objectives and KPIs for testing the response arrangements specified in this OPEP are detailed in **Appendix K: Testing Arrangements Plan**. All testing activities are documented, and corrective actions or recommendations are tracked to closure. This is achieved through the Santos EHS Toolbox system. Once completed, records of testing arrangements are entered into Santos EHS Toolbox and any actions or recommendations identified are assigned a responsible party for completion. The status of completion is tracked through the 'Action module' in the EHS Toolbox and communicated widely through monthly EHS KPI reporting.

Source control testing arrangements have been formulated with reference to recent industry guidelines including the APPEA Offshore Titleholders Source Control Guideline (June 2021) and the NOPSEMA Information Paper: Source Control Planning and Procedures IP1979 (June 2021).

Source control objectives and KPIs are developed in order to test the response arrangements specified in this OPEP and the Source Control Planning and Response Guideline (DR-00-OZ-20001). In addition to objectives and KPIs, test frequency and type of test are also detailed in **Appendix K.**

For each source control exercise, a copy of the exercise materials is recorded in the EHS toolbox. Action items identified are tracked in EHS toolbox to completion. Lessons learnt are incorporated into Santos guidelines and procedures as part of a process of continual improvement.

Most recently, Santos conducted a desktop exercise for a drilling campaign in April 2021. Exercise objectives included:

+ Implement an IMT structure
+ Demonstrate the use of Santos Offshore response plans and activity specific documentation
+ Provide an opportunity for participants to:
    - Complete notification and activations as per plan requirements;
    - Develop of an initial IAP; and
    - Record information in exercise directory.
+ Consider the implication of government mandated boarder restrictions for activations and support arrangements (e.g. Covid 19).

5.6.2 Audits

Oil spill response audits will follow the Santos Assurance Management Standard (SMS-MS15.1) and are scheduled as per the Santos annual assurance schedule. Audits will assist in identifying and addressing any deficiencies in systems and procedures. At the conclusion of the audit, any opportunities for improvement and/or corrective actions required (non-conformances) will be formally noted and discussed, with corrective actions developed and accepted. In some instances, audits may conclude with potential amendments to the OPEP.

The deployment readiness and capability of AMOSC's oil spill response equipment and resources in Geelong and Fremantle are audited every two years under the direction of AMOSC's participating members. The intent of this audit is to provide assurances to Santos and associated members about AMOSC's ability to respond to an oil spill incident as per the methods and responsibilities defined in OPEPs and AMOSC's Service Level Statement.

The deployment readiness and capability of OSRL's oil spill response equipment and personnel are audited every two years by the Emergency & Oil Spill Coordinator. The intent of this audit is to provide assurances to Santos of OSRL's ability to respond to an oil spill incident as per the methods and responsibilities defined in Santos' OPEPs and OSRL's SLA.

6 Response Strategy Selection

6.1 Spill scenarios

This OPEP outlines strategies, actions and supporting arrangements applicable for all credible oil spill events associated with Bedout Multi-Well Drilling activities. Of the credible spill scenarios identified in the Bedout Multi-Well Drilling EP (SO-00-BI-20003), all have been selected to represent worst case spills from a response perspective, taking into account the following characteristics:

+ They represent all hydrocarbon types that could be spilt during Bedout Multi-Well Drilling activities.
+ They represent maximum credible release volumes.
+ Those scenarios that represent the greatest spatial extent from a response perspective based on surface oil and shoreline accumulation as these are the key factors contributing to response.
+ Proximity to sensitive receptors, shorelines, State/Commonwealth boundaries etc.

The worst-case credible spill risks selected to inform this OPEP are presented in **Table 6-1**. Detail on the derivation of these maximum credible spills is provided within the Bedout Multi-Well Drilling EP (SO-00-BI-20003).

For a description of the characteristics and behaviour associated with hydrocarbons that may unintentionally be released refer to **Appendix A**.

Table 6-1: Maximum credible spill scenarios for Bedout multi-well drilling operations

Worst-case credible spill scenario	Location	Approx. depth of spill	Hydrocarbon type	Maximum credible volume released (m^3)	Release duration	Maximum extent of surface hydrocarbons
LOWC – subsea release	Apus well location[8]	72.6 m	Caley Condensate	1,745, 986	77 days	Approx. 1,100 km (1 g/m^2) Approx. 550 km (10 g/m^2) Approx. 225 km (50 g/m^2)
LOWC – surface release	Apus well location	0 m (surface)	Caley Condensate	1,746, 355	77 days	Approx. 1,100 km (1 g/m^2) Approx. 600 km (10 g/m^2) Approx. 300 km (50 g/m^2)
Surface diesel release (surface spill)	Bedout North	0 m (surface)	Marine Diesel Oil	329		Approx. 300 km (1 g/m^2) Approx. 200 km (10 g/m^2) Approx. 100 km (50 g/m^2)
	Bedout South	0 m (surface)				Approx. 175 km (1 g/m^2) Approx. 150 km (10 g/m^2) Approx. 100 km (50 g/m^2)

[8] The worst-case discharge rates during a LOWC incident are predicted to occur at the Pavo-1 well. Santos has defined a LOWC event at the Apus-1 well to represent the worst-case scenario in terms of potential environmental impacts. This is further described in Section 7.5.2 of the EP.

6.2 Response planning thresholds

Environmental impact assessment thresholds are addressed in Section 7.5.4 of the EP. In addition to the environmental impact assessment thresholds, response thresholds have been developed for response planning to determine the conditions that response strategies would be effective. These are shown in **Table 6-2**.

Table 6-2: Surface hydrocarbon thresholds for response planning

Hydrocarbon concentration (g/m²)	Description
>1	Estimated minimum threshold for commencing some scientific monitoring components (refer to **Appendix P**)
>50	Estimated minimum floating hydrocarbon threshold for containment and recovery and surface dispersant application
>100	Estimated floating hydrocarbon threshold for effective containment and recovery and surface dispersant application Estimated minimum shoreline accumulation threshold for shoreline clean-up

Containment and recovery effectiveness drops significantly with reduced oil thickness (McKinney and Caplis, 2017; NOAA, 2013). McKinney and Caplis (2017) tested the effectiveness of various oil skimmers at different oil thicknesses. Their results showed that the oil recovery rate of skimmers dropped significantly when oil thickness was less than 50 g/m².

Surface chemical dispersants are most effective on hydrocarbons that are at a thickness of 50 to 100 g/m² on the sea surface. EMSA (2010) recommends thin layers of spilled hydrocarbons should not be treated with dispersant. This includes Bonn Agreement Oil Appearance Codes (BAOAC) 1 to 3 (EMSA, 2010) (**Table 13-2**).

6.3 Stochastic spill modelling results

As detailed in Section 7.5.3 of the EP, modelling was conducted using a hydrocarbon analogue (LAVRANS condensate) to represent Caley Condensate. Across properties influencing weathering behaviour (e.g. density, boiling point curve, pour point) LAVRANS and Caley Condensate match very well (refer Section 7.5.3 of the EP). Wax content and asphaltene content are key drivers of emulsification potential since emulsification increases with the proportion of these components, especially over a threshold above 0.5% for asphaltene content (CSIRO, 2016). Increased rates of emulsification reduce the rate of natural weathering and increase the volume of oily waste, making recovery and treatment of oil more difficult. The modelled hydrocarbon has a similar asphaltene content (0.01%) to recent assays of Caley Condensate (<0.5%). Caley Condensate has a slightly higher wax content (9.2%) than that of the modelled analogue (6%), with both oils having higher wax content than is typical for condensates. LAVRANS has a viscosity of 2 cSt (at 20°C), slightly thicker (more conservative) than that of Caley Condensate (1.878 cSt at 20°C). Comparative distillation curves of LAVRANS and Caley Condensate match very closely (GHD, 2021b). On this basis, and in view of the similarity in other factors influencing weathering and persistence in the environment (refer Section 7.5.3 of the EP), the modelling conducted is considered representative of how Caley Condensate would behave in the environment.

For the purpose of spill response preparedness, outputs relating to floating oil and oil accumulated on the shoreline are most relevant (i.e., oil that can be diverted, contained, collected or dispersed through the use of spill response strategies) for the allocation and mobilisation of spill response resources. Therefore, these are the results presented in this OPEP for primary consideration.

Modelling results for dissolved and entrained oil for the worst-case scenarios have not been included in this OPEP, given there are limited response strategies that will reduce subsurface impacts. Refer to Section 7.6.1.1 of the EP for dissolved and entrained thresholds and Section 7.6.2 for impacts to receptors.

The worst case shoreline loading and/or probability of total contact at more than 1 g/m² (percentage) for all emergent and intertidal receptors is presented in **Table 6-3** to **Table 6-5**. For each scenario, these results represent the worst loading or floating oil contact probability for each receptor from all stochastic modelling runs (150 simulations) across all seasons. As a conservative measure, all intertidal reefs were classified as permanently exposed, however this is only the case for the small dry emergent areas of Sandy Islet on South Scott Reef, Cunningham Islet on Imperieuse Reef, and Bedwell Islet on Clerke Reef. All other intertidal reefs are submerged for a large proportion of the time and therefore unable to accumulate shoreline loading. Refer to Section 7.5.4 of the EP for further description on selection of oil exposure values.

Table 6-3: Worst-case stochastic spill modelling results – Apus-1 subsea LOWC

Location	Total contact probability (%) floating oil >1 g/m²	Minimum arrival time floating oil >1 g/m² (days)	Total probability (%) shoreline oil accumulation>10 g/m²	Minimum arrival time shoreline oil accumulation >10 g/m² (days)	Total probability (%) shoreline oil accumulation >100 g/m²	Minimum arrival time shoreline oil accumulation >100 g/m² (days)	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Maximum length of shoreline oiled (km) >100 g/m²
LOWC – subsurface release (Caley Condensate) of 1, 745, 986 m³ over 77 days								
Bedout Island	63.3	3.3	82	3.5	81.3	3.5	62.5	1.1
Rowley Shoals surrounds*	44.7	12.2	NC	NC	NC	NC	NC	NC
Eighty Mile Beach	36.7	7.7	28.7	13.9	28.7	13.9	481.5	51.2
Glomar Shoals*	34.7	9.5	NC	NC	NC	NC	NC	NC
Roebuck - Eighty Mile Beach	27.3	16.1	24.7	17.9	24.7	17.9	340.3	34.1
Dampier AMP	25.3	14	NC	NC	NC	NC	NC	NC
Imperieuse Reef MP	24.7	12.6	NC	NC	57.3	NC	1014	56.9
Kimberley AMP	23.3	24.8	NC	NC	NC	NC	NC	NC
Montebello AMP	23.3	21	NC	NC	NC	NC	NC	NC
Port Hedland-Eighty Mile Beach	22	5.1	21.3	5.1	21.3	5.1	641.8	51.2
Ningaloo – Offshore*	18.7	16	NC	NC	NC	NC	NC	NC
Mermaid Reef AMP	16	17.4	NC	NC	NC	NC	NC	NC
Clerke Reef MP	12.7	16.1	45.3	15.9	44.7	15.9	919.1	51.2

Location	Total contact probability (%) floating oil >1 g/m²	Minimum arrival time floating oil >1 g/m² (days)	Total probability (%) shoreline oil accumulation>10 g/m²	Minimum arrival time shoreline oil accumulation >10 g/m² (days)	Total probability (%) shoreline oil accumulation >100 g/m²	Minimum arrival time shoreline oil accumulation >100 g/m² (days)	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Maximum length of shoreline oiled (km) >100 g/m²
Broome – Roebuck	10.7	20.1	5.3	30.8	5.3	30.8	57.9	5.7
Rankin Bank*	8.7	21.9	NC	NC	NC	NC	NC	NC
Karratha-Port Hedland	7.3	6.7	20	7.6	20	7.6	138.5	39.8
Dampier Archipelago	5.3	18.3	54.7	15.2	54.7	15.2	848.9	91
Broome North Coast	4.7	24.7	6	26.1	6	26.1	108	22.7
Montebello Islands	3.3	27.7	49.3	19.5	46.7	19.5	419.9	22.7
King Sound	2.7	53	2	56.3	2	56.3	56.4	5.7
Barrow-Montebello Surrounds	2.7	27.8	NC	NC	NC	NC	NC	NC
Southern Islands Coast	2	68.2	39.3	26.7	39.3	26.7	315.6	22.7
Ningaloo – Outer NW	2	26.7	NC	NC	NC	NC	NC	NC
Scott Reef North*	1.3	99.2	8.7	51.8	8.7	51.8	200.8	45.5
Scott Reef South*	1.3	72.8	12	53.9	12	53.9	595.4	56.9
Thevenard Islands	NC	NC	30	25.4	30	25.4	101.6	11.4
Barracouta Shoals*	0.7	100.9	NC	NC	NC	NC	NC	NC
Browse Island	0.7	110.2	NC	NC	NC	NC	NC	NC
Seringapatam Reef	0.7	109.2	NC	NC	NC	NC	NC	NC

Location	Total contact probability (%) floating oil >1 g/m²	Minimum arrival time floating oil >1 g/m² (days)	Total probability (%) shoreline oil accumulation>10 g/m²	Minimum arrival time shoreline oil accumulation >10 g/m² (days)	Total probability (%) shoreline oil accumulation >100 g/m²	Minimum arrival time shoreline oil accumulation >100 g/m² (days)	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Maximum length of shoreline oiled (km) >100 g/m²
Northern Islands Coast	0.7	58.1	14.7	28.2	14.7	28.2	61.2	22.7
Muiron Islands	0.7	88	40	28.2	40	28.2	287.8	17.1
Ningaloo Coast North	0.7	88.8	40.7	30.5	40.7	30.5	397.9	210.4
Ashmore/Cartier - Outer	0.7	76.8	NC	NC	NC	NC	NC	NC
Ningaloo coast south	NC	NC	14	52.8	14	52.8	51.8	102.3
Barrow Island	NC	NC	44	24.1	42.7	24.1	337.3	73.9
Lowendal Islands	NC	NC	17.3	20.4	17.3	20.4	87.8	5.7
Shark Bay – Coast Outer	NC	NC	4.7	80.7	4.7	80.7	14.6	39.8
Ashmore Reef AMP	NC	NC	4.7	64.3	4.7	64.3	28.6	5.0
Cartier Island AMP	NC	NC	2.7	73.1	2.7	73.1	2.7	0.6
Abrolhos Islands Wallabi Group	NC	NC	1.3	91.2	NC	NC	NC	5.7
Middle Islands Coast	NC	NC	0.7	106.8	0.7	106.8	16.9	5.7
Abrolhos Islands Pelsaert Group	NC	NC	0.7	93.3	NC	NC	NC	NC
Indonesia - East	NC	NC	0.7	102.9	0.7	102.9	21.2	17.1

Location	Total contact probability (%) floating oil >1 g/m²	Minimum arrival time floating oil >1 g/m² (days)	Total probability (%) shoreline oil accumulation>10 g/m²	Minimum arrival time shoreline oil accumulation >10 g/m² (days)	Total probability (%) shoreline oil accumulation >100 g/m²	Minimum arrival time shoreline oil accumulation >100 g/m² (days)	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Maximum length of shoreline oiled (km) >100 g/m²
Jurien Bay - Yanchep	NC	NC	NC	111.9	NC	NC	0.1	NC

**Intertidal receptor*

Table 6-4: Worst-case spill Stochastic modelling results – Apus-1 surface LOWC

Location	Total contact probability (%) floating oil >1 g/m²	Minimum arrival time floating oil >1 g/m² (days)	Total probability (%) shoreline oil accumulation >10 g/m²	Minimum arrival time shoreline oil accumulation >10 g/m² (days)	Total probability (%) shoreline oil accumulation >100 g/m²	Minimum arrival time shoreline oil accumulation >100 g/m² (days)	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Maximum length of shoreline oiled (km) >100 g/m²
LOWC – surface release (Caley Condensate) of 1, 746, 355 m³ over 77 days								
Bedout Island	59.3	1.1	76.7	2	76.7	2	57.7	1.1
Imperieuse Reef MP	34	10.9	58.7	11.4	58.7	2	2,040	56.9
Dampier Archipelago	10	19.8	58	12.1	57.3	11.4	864.7	96.6
Clerke Reef MP	22.7	18.8	52.7	16.3	52.7	12.1	1,455	51.2
Montebello Islands	4	26.5	48	16.8	46	16.3	663.1	22.7
Barrow Island	NC	NC	47.3	19.3	46	16.8	628.3	79.6
Southern Islands Coast	0.7	96.2	46	24.9	44.7	19.3	441	22.7
Muiron Islands	0.7	94.2	44.7	26.6	42.7	24.9	350.3	17.1

Location	Total contact probability (%) floating oil >1 g/m²	Minimum arrival time floating oil >1 g/m² (days)	Total probability (%) shoreline oil accumulation >10 g/m²	Minimum arrival time shoreline oil accumulation >10 g/m² (days)	Total probability (%) shoreline oil accumulation >100 g/m²	Minimum arrival time shoreline oil accumulation >100 g/m² (days)	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Maximum length of shoreline oiled (km) >100 g/m²
Ningaloo Coast North	0.7	42.5	41.3	30.6	41.3	26.6	698.5	233.1
Thevenard Islands	NC	NC	40	23.9	40	30.6	178	11.4
Eighty Mile Beach	44.7	4.1	34.7	11.4	34.7	23.9	2,301	147.8
Roebuck – Eighty Mile Beach	34	14.3	34.7	14.8	33.3	11.4	811.2	56.9
Lowendal Islands	NC	NC	30	27.9	27.3	14.8	110.2	5.7
Port Hedland-Eighty Mile Beach	26.7	1.9	23.3	2.9	22.7	27.9	2,035	102.3
Northern Islands Coast	1.3	55.5	23.3	26.3	22.7	2.9	54.7	22.7
Karratha-Port Hedland	10	5.8	18.7	6.6	16	26.3	972.1	51.2
Scott Reef South	0.7	38.5	16	39	16	6.6	625.2	56.9
Ningaloo Coast South	NC	NC	15.3	52.3	14.7	39	44.2	73.9
Broome North Coast	10.7	34.6	13.3	35.9	11.3	52.3	197.6	34.1
Broome – Roebuck	19.3	26.1	13.3	27.8	10	35.9	180.2	17.1
Scott Reef North	NC	NC	10.7	46.4	10.7	31.8	136.5	51.2

Location	Total contact probability (%) floating oil >1 g/m²	Minimum arrival time floating oil >1 g/m² (days)	Total probability (%) shoreline oil accumulation >10 g/m²	Minimum arrival time shoreline oil accumulation >10 g/m² (days)	Total probability (%) shoreline oil accumulation >100 g/m²	Minimum arrival time shoreline oil accumulation >100 g/m² (days)	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Maximum length of shoreline oiled (km) >100 g/m²
Shark Bay – Coast Outer	NC	NC	8	59	4.7	46.4	22.4	34.1
Ashmore Reef AMP	NC	NC	7.3	62.3	6.7	59	28.9	5.0
Cartier Island AMP	NC	NC	3.3	84.6	2.7	62.3	3.8	0.6
King Sound	0.7	102.4	2	62.9	2	84.6	52.4	11.4
Zuytdorp Cliffs – Kalbarri	NC	NC	2	92.8	2	62.9	13.7	17.1
Exmouth Gulf Coast	NC	NC	0.7	109.8	NC	92.8	NC	5.7
Kalbarri – Geraldton	NC	NC	0.7	108.6	0.7	NC	2.7	5.7
Abrolhos Islands Easter Group	NC	NC	0.7	104.6	0.7	108.6	6.1	5.7
Abrolhos Islands Pelsaert Group	NC	NC	0.7	105.9	0.7	104.6	1.5	5.7
Indonesia – East	NC	NC	0.7	102.6	0.7	105.9	6	11.4
Glomar Shoals	58	9.5	NC	NC	NC	NC	NC	NC
Rowley Shoals Surrounds	50	9.4	NC	NC	NC	NC	NC	NC
Kimberley AMP	32.7	20.8	NC	NC	NC	NC	NC	NC

Location	Total contact probability (%) floating oil >1 g/m²	Minimum arrival time floating oil >1 g/m² (days)	Total probability (%) shoreline oil accumulation >10 g/m²	Minimum arrival time shoreline oil accumulation >10 g/m² (days)	Total probability (%) shoreline oil accumulation >100 g/m²	Minimum arrival time shoreline oil accumulation >100 g/m² (days)	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Maximum length of shoreline oiled (km) >100 g/m²
Ningaloo Offshore	31.3	13.6	NC	NC	NC	NC	NC	NC
Dampier AMP	30	12.2	NC	NC	NC	NC	NC	NC
Rankin bank	21.3	17.6	NC	NC	NC	NC	NC	NC
Mermaid Reef AMP	16	17.4	NC	NC	NC	NC	NC	NC
Barrow-Montebello Surrounds	10	26.2	NC	NC	NC	NC	NC	NC
Ningaloo- Outer NW	7.3	32.7	NC	NC	NC	NC	NC	NC
Ningaloo – Outer Coast North	6	30.7	NC	NC	NC	NC	NC	NC
Montebello AMP	41.3	11.3	NC	NC	NC	NC	NC	NC
Ashmore Cartier-Outer	1.3	47.8	NC	NC	NC	NC	NC	NC

**Intertidal receptor*

Santos

Table 6-5: Worst-case stochastic spill modelling results – vessel collision (marine diesel oil)

Location	Total contact probability (%) floating oil >1 g/m²	Minimum arrival time floating oil >1 g/m² (days)	Total probability (%) shoreline oil accumulation>10 g/m²	Minimum arrival time shoreline oil accumulation >10 g/m² (days)	Total probability (%) shoreline oil accumulation >100 g/m²	Minimum arrival time shoreline oil accumulation >100 g/m² (days)	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Maximum length of shoreline oiled (km) >100 g/m²
Vessel collision with third-party vessel and surface spill (MDO) of 393 m³ over 0.5 hours								
Bedout North (Latitude: 18° 46' 32.1" S / Longitude: 118°59'55.9" E)								
Imperieuse Reef MP	NC	NC	0.7	9.4	0.7	9.4	1.6	2.8
Bedout South (Latitude: 19°27'40.9" S / Longitude: 119°19'42.3" E)								
Bedout Island	10.0	0.5	17.3	0.8	6.7	0.8	52.8	1.4
Port Hedland - Eighty Mile Beach	4.0	1.6	2.7	2.6	1.3	2.6	1.6	2.8
Eighty Mile Beach	2.7	2.7	4.0	6.4	2.0	6.4	1.4	4.2

6.4 Deterministic modelling

Deterministic modelling is a useful tool for response planning. It uses a single spill run from the group of stochastic runs to help understand the likely behaviour and impacts of a single simulation of a worst-case spill scenario. This allows for effective scaling of response strategies.

Deterministic runs were selected for both the subsea and surface LOWC scenarios based on the largest predicted oil mass accumulated on all shorelines (Apus-1 subsea, stochastic realisation # 24 and LOWC at surface, stochastic realisation # 31). These deterministic runs are used to inform the chemical dispersant application plan (**Section 13.1**)

To inform the appropriate scale of Containment and Recovery response planning, an additional deterministic run was carried out. In this instance, the run that resulted in the highest mass of surface oil exceeding 50 g/m^2 was selected for the deterministic run (Apus-1 – Surface LOWC, stochastic realisation #101).

To inform the first-strike scientific monitoring capability requirements, the stochastic outputs from the two LOWC scenarios were interrogated to determine the realisations with the maximum number of receptors contacted by floating oil within the first seven days of an LOWC incident. These results are presented in **Section 6.4.1.**

This OPEP uses a mixture of worst-case stochastic and deterministic modelling results to help determine response planning needs.

6.4.1 Dispersant mitigated scenario results

Deterministic runs of subsea LOWC scenarios were run under three scenarios; no mitigation, with subsea dispersant injection (SSDI) as the sole mitigative response, and with both SSDI and surface dispersant (SDA) application as a combined response. Deterministic runs of surface LOWC scenarios were run with no mitigation and with SDA application as a response. Surface dispersant application was simulated using vessel and fixed wing aerial dispersant capability (FWADC), using the parameters described in **Table 6-6**.

Table 6-6: Surface dispersant application parameters used in modelling

Parameter	Vessel/s	Aircraft (FWADC)	Aircraft (Hercules)
Location of operational base	Port Hedland	Port Hedland	Port Hedland
Dispersant application rate	1:25		
Dispersant efficacy	40% for Caley Condensate (refer to **Appendix A**)		
Minimum thickness threshold for dispersant application	>50 g/m²		
Maximum viscosity threshold for dispersant application	<10,000 cSt		
Exclusion zones	+ Habitat Protection Zone or National Park Zone of an Australian Marine Park (application in Multiple Use Zones allowed) + State Marine Parks + State Waters + Within 10 km of water depths greater than 10 m lowest astronomical tide (LAT) + Within exclusion zones of offshore facilities + Not within 25 km of well site[9].		

6.4.1.1 Apus-1 subsea LOWC

Modelling of the unmitigated stochastic realisation #24 resulted in the highest accumulated shoreline load above 10 g/m^2 of 2,054 tonnes, occurring on day 103. Shoreline accumulation for this realisation began during day 32 at Roebuck – Eighty Mile Beach, with significant shoreline loading events continuing at a range of shoreline receptors until day ~112 (Clerke Reef MP, Imperieuse Reef MP, Roebuck-Eighty Mile Beach and Bedout Island). Imperieuse Reef MP received a peak shoreline load of 616 tonnes, with shoreline accumulation beginning on day 81, and reaching the peak load on day 107, with a maximum oiled shoreline length of 57 km. Lower, but significant peak shoreline loads were also predicted at Clerke Reef MP (195 tonnes on day 110), Eighty Mile Beach (102 tonnes on day 61), Roebuck – Eighty Mile Beach (131 tonnes on day 51) and Bedout Island (17 tonnes on day 68).

The dispersant response simulated for this scenario included SSDI and SDA responses. A summary of the total dispersant applied by each response unit type (vessels and aircraft) for the SDA response is presented in **Table 6-7**. The total volume of dispersant applied throughout the combined SSDI+SDA response was 10,866 m^3 for the SDA component, and 15,587 m^3 for the SSDI component (total of 26,453 m^3). This modelled volume accounts for the simulated behaviour of the vessels and aircraft within the OSCAR model, which have reduced

[9] Modelling indicates that leaving a 25 km buffer around the LOWC location allows for a significant proportion of Caley Condensate to evaporate (62% within 48 hours under moderate (5 m/s) wind conditions) (GHD, 2021b). The 25 km buffer represents the approximate distance that surface oil will travel from the LOWC location under moderate wind conditions within a 48-hour period. This approach allows for response techniques to be more effective on the remaining proportion of hydrocarbons within the marine environment.

ability to apply dispersants compared to the idealised dispersant plan scenario. This is mainly due to the fact that there isn't always oil available for treatment that satisfies the oil thickness criteria (SDA response).

In general, SSDI alone was not predicted to yield significant benefits to shoreline loading. At the moderate threshold (100 g/m^2) some increases in peak shoreline loads were predicted at various receptors, while a reduction was predicted at Imperieuse Reef MP. The increases in shoreline loading are likely from delayed surfacing of oil and less evaporative losses (which are the dominant weathering mechanism for this oil) and greater mass of surface oil in proximity to shoreline receptors at some locations. Overall, the accumulated shoreline load increased from 2,054 tonnes (unmitigated) to 2,439 tonnes (SSDI mitigated), though the altered timing of loading events for the SSDI scenario compared to the unmitigated scenario resulted in a slightly reduced instantaneous peak oil load of 811 tonnes on day 111 (SSDI mitigated) compared to 853 tonnes on day 103 (unmitigated).

Due to the highly energetic subsea discharge with high exit velocities the expected release will result in small droplets, so the relative effect of further reductions in droplet diameters via SSDI to enhance dispersion is low. Following the start of SSDI application (on day 9), the median droplet size of oil treated by SSDI (75%) is predicted to be 270 µm in diameter relative to untreated median diameters of 413-432 µm. The smaller droplets from the application of SSDI to the subsea plume increased the duration of entrainment in the water column due to the decreased rising velocity (due to buoyancy) to the sea surface. However, the change in the rising velocity of the droplets had a negligible effect on the total mass of surface oil and entrained oil throughout the simulation relative to the unmitigated scenario. This finding is consistent with the deterministic modelling presented in **Table 6-8**, showing a decrease of ~5% shoreline loading from unmitigated scenario.

In contrast, significant changes to the total mass of entrained oil and surface oil were simulated for the SDA mitigated scenario, where the mass of surface oil was reduced by ~50 % throughout the simulation relative to the unmitigated scenario, and the mass of entrained oil was approximately doubled (**Table 6-8)**. The SDA component of the response has therefore contributed significantly to reducing surface oil loads compared to the relatively ineffective SSDI response. The accumulated shoreline load reduces from 2,054 tonnes for the unmitigated simulation to 939 tonnes for the combined SSDI+SDA simulation, indicating that 1,115 tonnes of oil were prevented from arriving at shorelines as a result of the response. Note these volumes do not account for weathering that occurs after the oil has stranded and are higher than the peak volumes presented in **Table 6-8** which do account for weathering processes.

In summary, the deterministic simulations for this realisation predict only minor benefits from SSDI (negligible reduction in surface oil and a minor (~5%) reduction in shoreline accumulation), and moderate benefits from SDA (~50% reduction in shoreline accumulation).

However, there may be substantial differences between modelled dispersant effectiveness and real-world effectiveness. The ability of dispersants to disperse oil is based on three components: 1) operational effectiveness; 2) chemical effectiveness; and 3) hydrodynamic effectiveness (NRC, 2005). Operational effectiveness is influenced by site-specific parameters such as distribution of oil, the ability to target thicker oil patches and size and impact velocity of dispersant droplets hitting the oil (NRC, 2005). Chemical effectiveness is influenced by how long oil remains entrained in the water column; and hydrodynamic effectiveness is heavily influenced by metocean conditions and horizontal and vertical mixing. Actual effectiveness in the field will vary according to the components mentioned above and is likely to vary throughout the duration of a LOWC.

Table 6-7: Apus-1 subsea – summary of surface dispersant responses

Response Item	Amount of	
	Oil treated (tonnes)	Dispersant applied (m^3)
FWADCs	74,483	7,448
Hercules	23,039	2,304
Vessels	11,136	1,114
Total amount of oil treated with dispersants (tonnes)	108,658	
Total volume of dispersant used (m^3)	10,866	

Table 6-8: Spill modelling results showing application of subsea dispersant and surface dispersant as a mitigation strategy for Apus-1 subsea loss of well control scenario[10]

Location	Maximum mass oil ashore (tonnes)			Minimum arrival time (days)			Peak loading time (days)		
	Unmitigated	SSDI Mitigated	SSDI & SDA Mitigated	Unmitigated	SSDI Mitigated	SSDI & SDA Mitigated	Unmitigated	SSDI Mitigated	SSDI & SDA Mitigated
Clerke Reef MP	195.3	232.1	174.3	35.8	89.8	34.1	110.8	112	111.3
Imperieuse Reef MP	616.2	428.7	265.7	81.2	42.8	84.1	107.2	108.2	107.5
Eighty Mile Beach	102.6	382.7	NC	35.1	40.8	NC	61.1	62	NC
Roebuck-Eighty Mile Beach	131.2	239.6	NC	32.9	31.8	NC	51.1	36.3	NC
Bedout Island	17.3	19.6	8.0	42.8	32.8	31.7	68.3	68.2	43.8
All Shoreline	856	816.5	424.1	32.9	31.8	31.7	103.8	111.1	111.1

[10] Green cells indicate receptors that received at least a 5% reduction in shoreline loading, increased arrival time or increased peak loading time and red cells indicate receptors that received at least a 5% increase in maximum shoreline loading, decreased arrival time, or decreased peak loading time under the respective dispersant application summary (compared against the unmitigated scenario).

6.4.1.2 Apus-1 surface LOWC

Modelling of the unmitigated stochastic realisation #31 of the surface LOWC scenario resulted in the highest accumulated shoreline load above 10 g/m^2 of 5,127 tonnes across all shorelines. Eighty Mile Beach received a peak shoreline load of 1,504 tonnes, with shoreline accumulation beginning on day 28 and reaching the peak load on day 81, with a maximum oiled shoreline length of 119 km. Port Hedland-Eighty Mile Beach received a peak shoreline load of 1,329 tonnes, with shoreline accumulation beginning on day 37 and reaching the peak load on day 54, with a maximum oiled shoreline length of 85 km. Lower, but significant peak shoreline loads were also predicted at Karratha-Port Hedland (657 tonnes on day 53), Roebuck – Eighty Mile Beach (606 tonnes on day 45) and Bedout Island (32 tonnes on day 34).

SDA is the only applicable dispersant response for a surface release, therefore SSDI is not considered for this scenario, and a summary of the total dispersant application volume for each response unit type (vessels and aircraft) is present in **Table 6-9**. The total volume of dispersant applied throughout the simulated SDA response was 13,861 m^3.

Total mass of oil ashore, minimum arrival time and peak loading time for each receptor impacted when the scenario was unmitigated and mitigated through the use of SDA is presented in **Table 6-10**. The accumulated shoreline load reduces from 5,127 tonnes for the unmitigated simulation to 3,830 tonnes for the SDA simulation (26% reduction), indicating that 1,297 tonnes of oil were prevented from arriving at shorelines as a result of the response (**Table 6-10)**. At the moderate threshold (100 g/m^2), significant reductions in peak oil loads were also predicted at all contacted receptors (with the exception of Bedout Island which had a negligible change in peak oil load).

In summary, the SDA response simulation for this realisation predicted moderate benefits with a ~26% reduction in shoreline accumulation.

Table 6-9: Apus-1 surface loss of well control – summary of surface dispersant responses

Response Item	Amount of	
	Oil treated (tonnes)	Dispersant applied (m³)
FWADCs	92,988	9,299
Hercules	28,713	2,871
Vessels	16,913	1,691
Total amount of oil treated with dispersants (tonnes)	136,614	
Total volume of dispersant used (m³)	13,861	

Table 6-10: Spill modelling results showing application of surface dispersant as a mitigation strategy for Apus-1 of well control scenario[11]

Location	Maximum mass oil ashore (tonnes)		Minimum arrival time (days)		Peak loading time (days)	
	Unmitigated	SDA Mitigated	Unmitigated	SDA Mitigated	Unmitigated	SDA Mitigated
Port Hedland-Eighty Mile Beach	1,330	806	37.9	36.4	54.9	55.3
Karratha-Port Hedland	656.5	532.5	52.3	52.3	53.2	54.4
Eighty Mile Beach	1,508	1,196	15.7	27.8	81.3	80.9
Roebuck - Eighty Mile Beach	607.9	234.6	14.8	21.8	29.4	27.5
Bedout Island	32.4	32.4	33.3	33.7	34.8	35.3
All Shorelines	2,951	2,101	14.8	21.8	53.9	54.9

[11] Green cells indicate receptors that received at least a 5% reduction in shoreline loading, increased arrival time or increased peak loading time and red cells indicate receptors that received at least a 5% increase in maximum shoreline loading, decreased arrival time, or decreased peak loading time under the respective dispersant application summary (compared against the unmitigated scenario).

6.5 Evaluation of applicable response strategies

Based on the nature and scale of the credible spill scenarios outlined in **Section 6.1** and spill modelling results (**Sections 6.3** and **6.4**) the following spill response strategies have been assessed as potentially applicable for combatting a spill (**Table 6-11**).

Note: The information contained in **Table 6-11** has been developed by Santos for preparedness purposes. Santos may not be the Control Agency or Lead IMT for implementing a spill response. For example, for Level 2/3 spills within or entering State waters, DoT will ultimately determine the strategies and controls implemented for most State water activities with Santos providing resources and planning assistance.

Table 6-11: Evaluation of applicable response strategies

OSR Strategy	Tactic	Applicability and Designated Primary (1) or Secondary (2) Response Strategy		Considerations
		Caley Condensate	MDO	
Source Control	Spill kits	✓ 1	✓ 1	Relevant for containing spills that may arise on board a vessel or MODU.
	Secondary containment	✓ 1	✓ 1	Relevant for spills that may arise due to stored hydrocarbons, and from spills arising from machinery and equipment on board a vessel or MODU. Bunded areas will contain hydrocarbons reducing the potential for a spill escaping to marine waters. Where applicable open deck drainage will be closed to prevent hydrocarbon draining into the marine environment.
	Shipboard Oil Pollution Emergency Plan	✗	✓ 1	MARPOL requirement for applicable vessels. In the event a vessel hydrocarbon storage tank is ruptured, applicable strategies for reducing the volume of hydrocarbon releases will be contained within the vessel SOPEP. This may include securing fuel inventory via transfer to another storage area on-board the vessel, transfer to another vessel, or through pumping in water to affected tank to create a water cushion (tank water bottom). Trimming the vessel may also be used to avoid further damage to intact tanks. These actions will aim to minimise the volume of fuel spilled.
	Surface well kill	✓ 1	✗	Considered during relief well planning but may not be possible depending upon technical and safety constraints. Surface well kill is only considered when the estimated leak rate is small enough not to generate an explosive gas cloud and access to the MODU is still preserved. This methodology would not be considered should safe access to the MODU or ability to operate a vessel alongside the MODU not be achievable.

OSR Strategy	Tactic	Applicability and Designated Primary (1) or Secondary (2) Response Strategy		Considerations
		Caley Condensate	MDO	
	Capping stack	✗	✗	A subsea Capping Stack response strategy is not applicable given the petroleum activity will take place from a jack-up MODU. A semi-submersible drilling rig is not suitable for this drilling activity. The water depths at the Apus and Pavo location are approximately 65-93 m, which precludes the use of Dynamically Positioned (DP) vessels (drill ships and DP semi-submersibles) and would require a moored semi-submersible configurable for 12-point mooring. With the change in rig fleet over the last 10 years, most of the mid-water semi-submersibles that operate in the <100m water depth range have been retired. 5th generation moored semi-submersible are much harder to moor in shallow water due to the larger size of the vessels and Blow-out Preventers (BOP) resulting in increased metocean loads on mooring equipment and the BOP/Wellhead/Flex Joints. At these water depths, a semi-submersible may be able to be moored, but would likely be limited to older 3rd/4th generation units and would require extensive use of pre-laid moorings, heavy duty subsea wellheads to handle the bending loads and possibly wellhead fatigue reduction tethering equipment installed on the seabed. The exact MODU needs to be known to perform the detailed engineering work to confirm the MODU can be moored on location. Selecting a moored semi-submersible only would preclude a significant number of drilling units from being able to perform the work, which would affect schedule and cost. The premise is that using a semi-submersible unit enables the use of a capping stack for WCD. This is based on the assumption that the Lower Marine Riser Package (LMRP) and/or BOP can be disconnected and the rig moved off location enough to enable vertical access to the BOP/Wellhead. It is estimated that the MODU would need to be kedged off location >100m to allow vertical access from a vessel. This kedging process involves moving up to 12 anchor winches and takes several hours to complete, all in an emergency situation when in reality the rig crew would be evacuated. It is not realistic to assume that this would be possible in a WCD event. With the shallow water depth, it is less likely that a vessel would be unaffected by the boil/gas cloud at surface. Offset installation of a capping stack would be precluded given the presence of the rig and mooring lines over the location. Under a credible subsea LOWC event there are no connection points for Capping Stack installation.

OSR Strategy	Tactic	Applicability and Designated Primary (1) or Secondary (2) Response Strategy		Considerations
		Caley Condensate	MDO	
	Relief well drilling	✓ 1	✗	Relevant to LOWC. Relief well drilling is the primary method for killing the well if access to the MODU is not preserved. To be conducted as per the Santos Offshore Source Control Planning and Response Guideline (DR-00-OZ-20001) and Well-specific or Campaign-specific Source Control Plan. Given the shallow water depths at the Pavo and Apus locations (65-93 m respectively), a jack-up MODU would be the preferred rig type for a relief well. A semi-submersible could possibly be used to drill the relief well, but most floating units would not be suitable given the shallow water depth as it presents significant challenges with mooring (including feasible distance from the relief well target), limited space between the BOP & MODU and wellhead loading/fatigue concerns. The Well Specific Source Control plan written prior to the activity commencing will specifically look at what MODUs are available when the activity commences and ensures that there will be at least one technically suitable unit available to drill a relief well. Should a semi-submersible rig be the only option for a relief well, detailed engineering would be performed and long lead items would be organised to ensure there is a feasible MODU available to execute a relief well. Again, this would be documented in the Well Specific Source Control Plan.
In-Situ Burning	Controlled burning of oil spill	✗	✗	Not applicable to condensate wells due to safety hazards. Not applicable to diesel spills due to inability to contain marine diesel making it very difficult to maintain necessary slick thickness for ignition and sustained burning.

OSR Strategy	Tactic	Applicability and Designated Primary (1) or Secondary (2) Response Strategy		Considerations
		Caley Condensate	MDO	
Monitor and Evaluate Plan (Operational Monitoring)	Vessel surveillance	✓ 1	✓ 1	Provides real-time information on spill trajectory and behaviour (e.g. weathering). Informs implementation of other response strategies. Vessel personnel may not be trained observers. Vessel observers on leaking vessel may not have capacity to observe oil during emergency response procedure implementation. Constrained to daylight. Limited to visual range from the vessel. Limited capacity to evaluate possible interactions with sensitive receptors.
	Aerial surveillance	✓ 1	✓ 1	Provides real-time information on spill trajectory and behaviour (e.g. weathering). May identify environmental sensitivities impacted or at risk of impact (e.g. seabird aggregations, other users such as fishers). Informs implementation of other response strategies.
	Tracking buoys	✓ 1	✓ 1	Can be implemented rapidly. Can provide indication of near-surface entrained/dissolved hydrocarbons (most other monitor and evaluate techniques rely on the hydrocarbon being on the surface or shoreline).

OSR Strategy	Tactic	Applicability and Designated Primary (1) or Secondary (2) Response Strategy		Considerations
		Caley Condensate	MDO	
	Trajectory Modelling	✓ 1	✓ 1	Can be implemented rapidly. Predictive - provides estimate of where the oil may go, which can be used to prepare and implement other responses. No additional field personnel required. Not constrained by weather conditions. Can predict floating, entrained, dissolved and stranded hydrocarbon fractions. May not be accurate. Requires in-field calibration.
	Satellite Imagery	✓ 1	✓ 1	Can work under large range of weather conditions (e.g. night-time, cloud cover, etc). Mobilisation likely to be more than 24 hours. Requires processing. May return false positives.
	Operational Water Quality Monitoring	✓ 1	✓ 1	Fluorometry surveys are used to determine the location and distribution of the entrained oil and dissolved aromatic hydrocarbon components of a continuous subsea spill and validate the spill fate modelling predictions.

OSR Strategy	Tactic	Applicability and Designated Primary (1) or Secondary (2) Response Strategy		Considerations
		Caley Condensate	MDO	
	Shoreline Clean-up Assessment	✓ 1	✓ 1	Provides information on shoreline oiling (state of the oil, extent of pollution, etc). Can provide information on amenability of shoreline response options (e.g. clean up, protect and deflect). Provides information on status of impacts to sensitive receptors. Considerable health & safety considerations. Requires trained observers. Constrained to daylight. Delayed response time.
Chemical dispersion	Vessel Application	✓ 1	✗	*Caley Condensate* For all worst case LOWC scenarios, the expression of oil at the surface is expected to be within the suitable parameters for surface dispersant application and containment and recovery. Modelling conducted on surface dispersants as a mitigation strategy (**Section 6.4**) shows that application via vessel and aerial application is considered a feasible response strategy. Maintaining a 25 km buffer zone around the well location in which no chemical dispersants are applied allows for a significant portion of the hydrocarbon to evaporate (62% under normal wind conditions) prior to the application of SDA. SSDI is only suitable for subsea LOWC scenarios. For this activity, the most likely type of loss of well control would be a surface discharge due to the fact that the wells will be drilled using a jack-up drilling unit, with the BOP positioned at the surface. Deterministic modelling indicates that due to the delayed surfacing of the oil and less evaporative losses (which is the main weathering mechanism for this oil), SSDI may increase peak shoreline loading at some receptors. In general, SSDI alone was not predicted to yield significant benefits to shoreline
	Aerial Application	✓ 1	✗	
	Subsea dispersant injection	✓ 2	✗	

OSR Strategy	Tactic	Applicability and Designated Primary (1) or Secondary (2) Response Strategy		Considerations
		Caley Condensate	MDO	
				loading. At the moderate threshold (100 g/m^2) some increases in peak shoreline loads were predicted at various receptors, while a reduction was predicted at Imperieuse Reef MP (**Section 6.4.1**). However, SSDI is known to potentially reduce VOC levels at the sea surface (French-McCay and Cowley, 2017), making conditions safer for responders and source control personnel. Due to the lack of any benefit from SSDI shown from modelling, SSDI would only be employed as a secondary response strategy if it was necessary to use to ensure the safety of response personnel working close to the well site. Dispersant effectiveness monitoring (refer to **Section 13.5**) would be utilised to show that VOC reduction is being achieved; if not SSDI would cease. Using the Subsea First Response Toolkit for debris clearance SSDI is considered a secondary response strategy for this activity, due to: + no ROV-controllable devices installed subsea (surface wellhead and BOP used) + the high exit velocity of subsea plumes which results in small, entrained droplets that are not materially affected by the subsea application of chemical dispersants that indicates minimal environmental benefit from SSDI (**Section 6.7**) + potential for environmental impact from dispersant toxicity in the surrounding marine environments for limited environmental benefit. The environmental impacts of SSDI are further assessed in **Section 13.4.1** and Section 6.8 of the EP. For the reasons stated above, surface dispersant application is considered a primary strategy with SSDI considered a secondary strategy. *Marine Diesel* Marine diesel is not considered a persistent hydrocarbon and has high natural dispersion rates in the marine environment. Chemical dispersant application is not recommended as a beneficial option for

OSR Strategy	Tactic	Applicability and Designated Primary (1) or Secondary (2) Response Strategy		Considerations
		Caley Condensate	MDO	
				diesel as it has a low additional benefit of increasing the dispersal rate of the spill while introducing the potential for more chemicals into the marine environment.
Offshore Containment and Recovery	Use of offshore booms/skimmers or other collection techniques deployed from vessel/s to contain and collect oil	✓ 1	✗	*Caley Condensate* Likely to be effective on Caley Condensate, which has a moderate persistent component (62% of surface slick predicted to evaporate after 48 hours under moderate wind speed conditions). Deterministic modelling predicted all LOWC scenarios would result in sufficient thickness on the water for effective containment and recovery. If metocean weather conditions are unsuitable for containment and recovery (more than 1.8 m for offshore systems and more than 1.0 m for nearshore systems), then this will result in significantly higher rates of weathering and entrainment in the product reducing surface thicknesses to a level at which containment and recovery may not be effective. Due to the low viscosity of the oil prior to weathering containment and recovery may not be effective on the unweathered oil. Additionally, the volatilisation of the fresh oil at the surface may prevent safe containment and recovery operations. *Marine Diesel* Not suitable for marine diesel given its rapid weathering nature. Marine diesel spreads quickly to a thin film, making recovery via skimmers difficult and ineffective.

OSR Strategy	Tactic	Applicability and Designated Primary (1) or Secondary (2) Response Strategy		Considerations
		Caley Condensate	MDO	
Mechanical Dispersion	Vessel prop-washing	✓ 2	✓ 2	Safety is a key factor and slicks with potential for high volatile organic compound (VOC) emission are not suitable. Mechanical dispersion may be applicable for the localised entrainment of surface oil but is not considered to have a significant effect on removing oil from the surface. Mechanical dispersion will entrain surface oil into the top layer of the water column. The aim of mechanical dispersion is to reduce the concentration of oil floating at the surface which could potentially contact receptors at the sea surface (e.g. sea birds) or shoreline receptors (e.g. mangroves). Once dispersed in the water column the smaller droplet sizes enhance the biodegradation process. Marine diesel is a light oil that can be easily dispersed in the water column by running vessels through the plume and using the turbulence developed by the propellers to break up the slick. Mechanical dispersion may be considered for targeted small breakaway patches of crude but may have limited effectiveness. The potential disadvantage of mechanical dispersion is that it could temporarily increase the concentration of entrained and dissolved oil in the vicinity of submerged shallow water receptors (e.g. corals, seagrass ad macroalgae). This is most likely in shallow water of a few metres deep. The suitability of mechanical dispersion as a response measure would consider the prevailing environmental conditions (it mimics the action of wave induced entrained so is most beneficial in calm conditions) and the type, proximity and depth (as applicable) of sensitivities in the area. Mechanical dispersion will be considered for petroleum activity sourced spills at the discretion of the OSC/IMT or by the relevant Control Agency. It is unlikely that vessels would be specifically allocated for mechanical dispersion but vessels undertaking primary strategies may be used opportunistically.

OSR Strategy	Tactic	Applicability and Designated Primary (1) or Secondary (2) Response Strategy		Considerations
		Caley Condensate	MDO	
Protection and Deflection	Booming in nearshore waters and at shorelines	✓ 1	✓ 2	Considered if operational monitoring shows or predicts contact with sensitive shorelines. *Caley Condensate* Modelling shows high probability of contact, above impact and response thresholds for all LOWC scenarios. The effectiveness of this response will be dependent on local bathymetry, sea state, currents, tidal variations and wind conditions at the time of implementation. It is typically more effective in areas with low to moderate tidal ranges on low energy coastline types such as sandy beaches. Moderate to high tidal ranges generally include stronger currents and larger/longer intertidal areas that make it less effective and more difficult to keep booms in place. Protection and deflection are feasible in locations where access to the coastline allows vehicles and vessels to undertake operations. Activities would focus on areas of high protection value in low energy environments based upon real-time operational surveillance, provided the environmental and metocean conditions are favourable for an effective implementation. Consequently, this strategy may not be applicable across all areas or receptors identified as priority for protection. *Marine Diesel* Modelling shows low probability of contact with shorelines. Shoreline protection and deflection activities can result in physical disturbance to intertidal and shoreline habitats. Given the relatively small volumes predicted to come ashore, and the high rates of natural biodegradation of marine diesel, it would be better to focus on high priority areas for protection. This strategy is considered to be a secondary response strategy where it is safe and practical to implement and where priority protection areas are at risk of impact from marine diesel.

OSR Strategy	Tactic	Applicability and Designated Primary (1) or Secondary (2) Response Strategy		Considerations
		Caley Condensate	MDO	
Shoreline clean-up	Activities include physical removal, surf washing, flushing, bioremediation, natural dispersion	✓ 1	✓ 2	Considered if operational monitoring shows or predicts contact with sensitive shorelines. *Caley Condensate* Shoreline clean-up has the ability to reduce stranded oil on shorelines and/or reduce remobilisation of oil. However, this response has potential to cause more impacts than benefits, especially if oiling is light. Shoreline assessments as part of operational monitoring provide site-specific guidance on the applicability and likely benefits of different clean-up techniques. Intrusive activities such as physical removal of waste using manual labour or mechanical aids requires careful site-specific planning to reduce secondary impacts of habitat disturbance, erosion and spreading oil beyond shorelines. Secondary impacts can be minimised through the use of trained personnel to lead operations. Logistically, clean-up operations will require site access, decontamination, waste storage, personal protective equipment, catering and transport services to support personnel working on shorelines. Flushing may be considered if the oil enters high priority/slow recovery habitats such as mangroves. Natural dispersion will occur as the hydrocarbon is remobilised from rock shelves and hard substrates, while residual hydrocarbons will biodegrade. *Marine Diesel* Modelling shows less than 20% probability of shoreline accumulation at more than 10 g/m^2. Shoreline clean-up activities can result in physical disturbance to shoreline habitats. Given the relatively small volumes predicted to come ashore, and the high rates of natural biodegradation of marine diesel, it would be better to focus on high priority areas for clean-up. This strategy is considered to be a secondary response strategy where it is safe and practical to implement and where protection priority areas are at risk of impacts from marine diesel.

OSR Strategy	Tactic	Applicability and Designated Primary (1) or Secondary (2) Response Strategy		Considerations
		Caley Condensate	MDO	
Oiled wildlife response	Activities include hazing, pre-emptive capture, oiled wildlife capture, cleaning and rehabilitation	✓ 1	✓ 1	Can be used to deter and protect wildlife from contact with oil. Mainly applicable for marine and coastal fauna (e.g. birds) where oil is present at the sea surface or accumulated at coastlines. Surveillance can be carried out as a part of the fauna specific operational monitoring. Wildlife may become desensitised to hazing method. Hazing may impact upon animals (e.g. stress, disturb important behaviours such as nesting or foraging). Permitting requirements for hazing and pre-emptive capture.
Scientific Monitoring	The monitoring of environmental receptors to determine the level of impact and recovery form the oil spill and associated response activities	✓ 1	✓ 1	Monitoring activities include: + water and sediment quality + biota of shorelines (sandy beaches, rocky shores and intertidal mudflats) + mangrove monitoring + benthic habitat monitoring (seagrass, algae, corals, non-coral benthic filter feeders) + seabirds and shorebirds + marine megafauna (incl. whale sharks and mammals) + marine reptiles (incl. turtles) + seafood quality + fish, fisheries and aquaculture The type and extent of scientific monitoring will depend upon the nature and scale of oil contact to sensitive receptor locations as determined through operational monitoring. Pre-defined initiation criteria exist for scientific monitoring plans associated with marine and coastal sensitivities.

6.6 Identify priority protection areas and initial response priorities

Combined spill modelling results were used to predict the Environment that may be Affected (EMBA) for Bedout Multi-Well Drilling operations (refer Section 3.1 of the Bedout Multi-Well Drilling EP (SO-00-BI-20003)). The EMBA is the largest area within which effects from hydrocarbons spills associated with this activity, could extend. Within the EMBA, Santos has determined Hot Spots (key areas of high ecological value that have the greatest potential to be impacted by a Bedout Multi-Well Drilling operational spill) for which detailed oil spill risk assessment has been conducted (refer Section 7.6.4.1 of the Bedout Multi-Well Drilling EP).

From these Hot Spot areas, priority protection areas for spill response have been identified. In the spill response preparedness strategy, it is not necessary for all Hot Spots to have detailed planning. For example, wholly submerged Hot Spots may only be contacted by entrained oil, and the response would be largely to implement scientific monitoring to determine impact and recovery. Hot Spots with features that are not wholly submerged (i.e., emergent features) are considered for Priority for Protection. This final determination of ‘Priority for Protection’ sites, for the oil spill response strategy, is based on the worst-case estimate of floating oil concentration, shoreline loading and minimum contact time at response threshold concentrations. **Table 6-2** details the hotspots and Priority Protection Areas (PPA) from the list of contacted receptors from both the subsea and surface LOWC scenarios. Rationale is included in the table when a hotspot is included, or not included, as a priority for protection.

Table 6-12: Determination and rationale for the priorities for protection

Hotspots	Type	HEV ranking	Hotspot	PPA	Rationale
Ningaloo- Outer Coast North	Intertidal	1	Y	N	+ No floating or accumulated hydrocarbon contact.
Ashmore Reef AMP	Emergent	1	Y	Y	+ Shoreline accumulation + HEV rank 1
Eighty Mile Beach	Emergent	2	Y	Y	+ Floating oil contact + Shoreline accumulation + HEV rank 2
Mermaid Reef AMP	Intertidal	2	Y	N	+ No floating or accumulated hydrocarbon contact.
Muiron Islands	Emergent	2	Y	Y	+ Shoreline accumulation + HEV rank 2
Ningaloo Coast North	Emergent	2	Y	Y	+ Shoreline accumulation + HEV rank 2
Imperieuse Reef MP	Emergent	3	Y	Y	+ Shoreline accumulation + Floating oil contact + HEV rank 3
Clerke Reef MP	Emergent	3	Y	Y	+ Shoreline accumulation

					+ HEV rank 3
Broome-Roebuck	Emergent	3	Y	Y	+ Shoreline accumulation + HEV rank 3
Barrow-Montebello Surrounds	Intertidal	3	Y	Y	+ Shoreline accumulation + HEV rank 3
Montebello Islands	Emergent	3	Y	Y	+ Shoreline accumulation + HEV rank 3
Lowendal Islands	Emergent	3	Y	Y	+ Shoreline accumulation + HEV rank 3
Barrow Island	Emergent	3	Y	Y	+ Shoreline accumulation + HEV rank 3
Ningaloo- Outer NW	Submerged	3	Y	N	+ No floating or accumulated hydrocarbon contact.
Scott Reef South	Emergent	3	Y	N	+ No floating or accumulated hydrocarbon contact.
Scott Reef North	Intertidal	3	Y	N	+ No floating or accumulated hydrocarbon contact.
Ningaloo Coast South	Emergent	3	Y	N	+ No floating or accumulated hydrocarbon contact (accumulation at low threshold).
Dampier Archipelago	Emergent	3	Y	Y	+ Shoreline accumulation + HEV rank 3
Kimberley AMP	Submerged	3	Y	N	+ No floating or accumulated hydrocarbon contact
Eighty Mile Beach AMP*	Submerged	4	Y	N	+ Submerged receptor
Bedout Island*	Emergent	4	Y	Y	+ Floating oil contact (short time to contact) + Shoreline accumulation + HEV rank 4
Rowley Shoals surrounds*	Submerged	4	Y	N	+ No accumulated hydrocarbon contact + Floating oil contact at low concentration.
Ningaloo- Offshore*	Submerged	4	Y	N	+ Subsea receptor.
Broome North Coast*	Emergent	4	Y	N	+ Low concentration of accumulated hydrocarbon contact + No floating oil contact.

Port Hedland-Eighty Mile Beach*	Emergent	5	Y	Y	+ Floating oil contact + High shoreline accumulation
Karratha-Port Hedland*	Emergent	5	Y	Y	+ High shoreline accumulation
Roebuck - Eighty Mile Beach*	Emergent	5	Y	Y	+ High shoreline accumulation
Southern Islands Coast *	Emergent	5	Y	Y	+ High shoreline accumulation

* Discretionary hotspots are further described in the EP, Section 7.6.4.1

Table 6-13 lists the key sensitivities and associated locations within the protection priority areas identified for both the subsea and surface loss of well control worst-case spill scenarios. **Table 6-14** presents the priorities for protection for the diesel scenario. The ranking of these sensitivities (also referred to as receptors) are listed, which is consistent with the rankings in *Provision of Western Australian Marine Oil Pollution Risk Assessment – Protection Priorities: Assessment for Zone 2: Pilbara* (DoT, 2017). Using a combination of sensitivities, and their associated rankings; together with the modelled maximum total volumes ashore and minimum time to shoreline contact, an initial response priority is provided in **Table 6-13** and **Table 6-14.** This information is designed to aid decision making in the preliminary stages of the response operation, so that initial resources are used for best effect.

Table 6-13: Initial response priorities, Apus-1 subsea and surface loss of well control (Caley Condensate)

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
Imperieuse Reef MP	Turtles Green turtles (Vulnerable) and hawksbill turtles (Vulnerable) known to be present – not regionally significant habitat	2	1	N/A	N/A	Subsea LOWC: 1014 Surface LOWC: 2040	Subsea LOWC: 13.5 days Surface LOWC: 11.4 days	Medium
	Marine mammals Humpback whale migration	2	1	N/A	Humpback whale migration: Jun to Jul			Low
	Birds Wide range of seabirds observed	2	1	N/A	N/A			Medium
	Coral and other subsea benthic primary producers	3	4	N/A	Coral spawning: Mar & Oct			Medium

[12] Provision of Western Australian Marine Oil Pollution Risk Assessment – Protection Priorities: Assessment for Zone 2: Pilbara (DoT, 2017).

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
	Socio-economic Tourism - charter boats, diving and snorkelling Recreational fishing (limited numbers due to distance from coast)	1	1	N/A	Tourism: Sep to Dec			Low
Clerke Reef MP	Turtles Green turtles (Vulnerable) and hawksbill turtles (Vulnerable) known to be present – not regionally significant habitat	2	1	N/A	N/A	Subsea LOWC: 919 Surface LOWC: 1455	Subsea LOWC: 15.9 days Surface LOWC: 16.3 days	Medium
	Marine mammals Humpback whale migration	2	1	N/A	Humpback whale migration: Jun to Jul			Low
	Birds Second largest breeding colony on red-tailed tropicbirds (Migratory) in Australia Wide range of seabirds observed	2	1	Bedwell Island	Nesting: Sept to Feb			Medium
	Coral and other subsea benthic primary producers	3	4	N/A	Coral spawning: Mar & Oct			Medium

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Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
	Socio-economic Tourism – charter boats, diving and snorkelling Recreational fishing (limited numbers due to distance from coast)	1	1	N/A	Tourism: Sep to Dec			Low
Ningaloo Coast North	World Heritage Area	5	5	N/A	N/A	Subsea LOWC: 398 Surface LOWC: 699	Subsea LOWC: 30.5 days Surface LOWC: 30.6 days	High
	Mangroves	3	3	Mangrove Bay Yardie Creek	N/A			High
	Turtles Loggerhead (Endangered), green (Vulnerable), hawksbill (Vulnerable) (low density)	4	3	North Mauds Landing, south of Point Cloates, Mandu Creek to Yardie Creek, Jurabi Point, Gnarraloo Bay and Cape Farquhar	Turtle nesting and breeding Nov to Mar with peak in late Dec/early Jan			High

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
	Marine mammals Pygmy blue whales (Endangered) foraging area. Dugongs (Marine/migratory) (breeding and foraging)	3	2	N/A	Pygmy blue whale migration: Apr to Aug Humpback whale migration: Jun to Jul			Medium
	Sharks and rays Seasonal aggregations of whale sharks (Vulnerable) and manta rays	2	3	N/A	Whale sharks – Mar to Jul			Medium
	Birds 33 species seabirds and avifauna (Including Critically Endangered Eastern Curlew)	5	4	Main breeding areas at Mangrove Bay, Mangrove Point, Point Maud, the Mildura wreck site and Fraser Island	Nesting: Sep to Feb			High
	Coral and other subsea benthic primary producers	3	4	Largest fringing reef in Australia	Coral spawning: Mar & Oct			High

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
	Tourism – significant fishing/charter boat tourism, camping and use of nearshore sanctuary zones (fishing, snorkelling)	2	2	Numerous campsites and snorkelling sites along western Cape Range shorelines, Coral Bay, Waroora Station	Year-round			Medium
Barrow Island	<u>Mangroves</u>	3	3	Bandicoot Bay	N/A	Subsea LOWC: 337 Surface LOWC: 628	Subsea LOWC: 24.1 days Surface LOWC: 19.3 days	Medium
	<u>Turtles</u> Regionally and nationally significant green (western side) and flatback turtle (eastern side) nesting beaches, Turtle Bay north beach, North and west coasts-John Wayne Beach, loggerheads and hawksbill	4	3	Green turtles on the western side of Barrow Island and flatback turtle nesting on the eastern side. Turtle Bay north beach, North and west coasts and John Wayne Beach have loggerhead and hawksbill turtle nesting	Year round, peaking Oct to Jan			High

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
	Birds Migratory birds (important habitat); tenth of top 147 bird sites, highest population of migratory birds in Barrow Island Nature Reserve (south-southeast of island). Double Island has important bird nesting sites (shearwaters and sea eagles)	2	1	Double Islands, migratory birds at Bandicoot Bay and widespread on Barrow Island	Nesting: Sep to Feb			Low
	Coral and other subsea benthic primary producers	3	4	Eastern side – Biggada Reef	Coral spawning: Mar & Oct			Medium
	Socio-economic Significant for recreational fishing and charter boat tourism, Nominated place (National heritage), Industry – Reverse Osmosis Plant and port operations Petroleum Activities such as Barrow Island petroleum production	5	5	Reverse Osmosis plant and port on eastern side of island (Port of Barrow Island)	N/A			Medium

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
Dampier Archipelago	Mangroves	3	3	Widespread and present in lagoons Important stands west Intercourse and Enderby	N/A	Subsea LOWC: 849 Surface LOWC: 865	Subsea LOWC: 15.2 days Surface LOWC: 12.1 days	Medium
	Turtles Hawksbill (Vulnerable) and flatback (Vulnerable) turtles	4	3	Hawksbill turtle nesting north-west of Rosemary Island and Delambre. Flatback turtle nesting at Legendre, Huay and Delambre	Turtle nesting and breeding Nov – Mar with peak in late Dec/early Jan			Medium
	Marine mammals Humpback whale (vulnerable) migration area	3	2	N/A	Humpback whale migration: Jun to Jul			Low
	Birds Migratory and threatened seabirds – at least 14 species Significant nesting, foraging and resting areas	3	2	Breeding on Goodwyn, Keast Islands and Nelson Rocks.				Medium
	Coral and other subsea benthic primary producers	3	4	Widespread	Coral spawning: Mar & Oct			Low

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
	Socio-economic Recreational fishing/ charter boats, tourism related to water-based activities and nature National Heritage Aboriginal sites Camping beaches Shipping fairway and proximity to major port	4	4	Widespread	Year-round			Low
Montebello Islands	Mangroves	3	3	Widespread and present in lagoons. Important stands in Stephenson Channel	N/A	Subsea LOWC: 420 Surface LOWC: 663	Subsea LOWC: 19.5 days Surface LOWC: 16.8 days	Medium
	Turtles Loggerhead (Endangered) and green (Vulnerable) (significant rookeries); hawksbill (Vulnerable), flatback (Vulnerable) turtles	4	3	Northwest and Eastern Trimouille Islands (hawksbill) Western Reef and Southern Bay at Northwest Island (green)	Turtle nesting and breeding Nov to Mar with peak in late Dec/early Jan			Medium

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
	Marine mammals Pygmy blue whale (Vulnerable) and humpback whale (Vulnerable) migration area	3	2	N/A	Pygmy blue whale migration: Apr to Aug Humpback whale migration: Jun to Jul			Low
	Birds Migratory and threatened seabirds – at least 14 species Significant nesting, foraging and resting areas	3	2	Widespread	Nesting: Sep to Feb			Medium
	Coral and other subsea benthic primary producers	3	4	Widespread	Coral spawning: Mar & Oct			Low

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
	Socio-economic Pearling (inactive/pearling zones) Very significant for recreational fishing and charter boat tourism (Marine Management Area) Social amenities and other tourism Nominated place (national heritage)	3	2	Widespread	Year-round			Low
Muiron Islands	Turtle nesting – major loggerhead (Endangered) site, significant Green turtle (Vulnerable) nesting site, low density Hawksbill nesting (Vulnerable), occasional Flatback (Vulnerable) presence	4	3	Loggerhead – South Island	Turtle nesting and breeding Nov to Mar with peak in late Dec/early Jan	Subsea LOWC: 288 Surface LOWC: 350	Subsea LOWC: 28.2 days Surface LOWC: 26.6 days	High
	Coral and other subsea benthic primary producers	3	4	N/A	Coral spawning: Mar & Oct			Medium
	Seabird nesting	2	1	Widespread	Nesting: Sept-Feb			Low
	Humpback whale (Vulnerable) migration	3	2	N/A	Jun to Jul			Medium

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
	Exmouth gulf prawn fishery (Muiron is western boundary); significant for recreational fishing and charter boat tourism	1	2		Prawn fishery – April to November Tourism and recreation: year-round			Low
Bedout Island	<u>Turtles</u> Foraging - loggerhead (Endangered), Green turtle (Vulnerable) and Hawksbill (Vulnerable). No known nesting	4	3	N/A	N/A	Subsea LOWC: 324 Surface LOWC: 299	Subsea LOWC: 3.5 days Surface LOWC: 2 days	High
	Coral and other subsea benthic primary producers	3	4	Fringing island	Coral spawning: Mar & Oct			Low
	<u>Birds</u> Globally significant Brown Booby breeding location – migratory species	2	1	N/A	Breeding: May to Nov			Medium
	Mangroves	3	3	Offshore	N/A			Medium

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
Lowendal Island	Coral and other subsea benthic primary producers	3	4	Deep-water benthic (soft sediment) habitats Dugong Reef and Batman Reef (eastern side of Island)	Coral spawning: Mar and Oct	Subsea LOWC: 88 Surface LOWC: 110	Subsea LOWC: 20.4 days Surface LOWC: 27.9 days	Low
	Turtles Important hawksbill, loggerhead and green turtle nesting	4	3	Beacon, Parakeelya, Kaia and Pipeline, Varanus Pipeline, Harriet and Andersons Beaches	Nesting all year, peak Oct to Jan Significant flatback rookery, nesting season for flatback turtles peaks Dec to Jan			Medium
	Birds Approximately 89 species of avifauna, 12 to 14 migratory and threatened seabirds	2	1	-	Year-round			Medium
	Marine mammals Dugong foraging	3	2	Seagrass beds	N/A			Low

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
	Socio-economic and heritage Social amenities and other tourism, very significant for recreational fishing and charter boat tourism	2	2	Widespread	N/A			Low
Eighty Mile Beach	Ramsar wetland	5	5	220 km of beach and intertidal mudflats from Cape Missiessy to Cape Keraudren and Mandora Salt Marsh 40 km to the east	N/A	Subsea LOWC: 482 Surface LOWC: 2301	Subsea LOWC: 13.9 days Surface LOWC: 11.4 days	High
	Mangroves	3	4	Mandora Saltmarsh area	N/A			Medium
	Turtles Flatback turtle nests (Vulnerable) at scattered locations along shoreline	3	2	N/A	Turtle nesting year-round, peak Oct to Feb			High
	Birds 97 wetland species, 42 of which are listed under international agreements.	4	3	Intertidal areas	Migration: Aug to Nov			High

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
	Socio-economic and heritage Tourism – camping and nature, recreational fishing. Wetlands significant to three local Aboriginal groups, several Aboriginal heritage sites present	1	1	N/A	N/A			Low
Ashmore Reef AMP	Coral and other subsea benthic primary producers	2	3	N/A	Coral spawning: Mar and Oct	Subsea LOWC: 227.4 Surface LOWC: 229.7	Subsea LOWC: 74.3 days Surface LOWC: 62.3 days	Low
	Birds Important seabird rookery, important staging point/feeding area for migratory birds including curlew sandpiper (Critically Endangered)	4	3	N/A	Migration: Aug to Nov			Medium
	Turtles Critical nesting and inter-nesting habitat for green turtles (Vulnerable), significant foraging populations of green, loggerhead turtles (Endangered) and hawksbill turtles (Vulnerable)	4	3	-	Turtle nesting and breeding Nov to Mar with peak in late Dec/early Jan			High

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
	Marine mammals Small dugong population (<50 individuals) Migratory pathway for pygmy blue whales	3	2	N/A	Pygmy blue whale migration: Apr to Aug			High
	Socio-economic and heritage Staging area for traditional Indonesian fishers Commercial tourism – recreation and scientific research	1	1	-	-			High
Broome-Roebuck bay	Seagrass, macro algae and mangroves	3	4	N/A	-	Subsea LOWC: 57.9 Surface LOWC: 180.2	Subsea LOWC: 30.8 days Surface LOWC: 31.8 days	Medium
	Birds RASMAR site 84 waterbird species, 35 shorebird species, 47 of which are listed under CAMBA, JAMBA and ROKAMBA 170,000 waterbirds (a maximum count) and 300,000 shorebirds use the area as a migration terminus annually, key period is Aug-Nov	5	5	N/A	Migration: Aug to Nov			High

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
	when contact with oil spill could result in impacts at a population level							
	Turtles Flatback turtles nest in small numbers around Cape Villaret near southern end of the Bay	4	3		Turtle nesting and breeding Nov to Mar with peak in late Dec/early Jan			Medium
	Marine mammals Small dugong population (<50 individuals) Migratory pathway for pygmy blue whales	4	3	N/A	Pygmy blue whale migration: Apr to Aug			Medium
	Socio-economic and heritage Tourism: recreational (increased visitation dry season at Crab Creek, Dampier Creek, Fishermans Bend, Bush Point) paleontological, educational, aesthetics	2	2	-				Low

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
	Economic activity associated with fishing/aquaculture, high tourism value Recreational fishing – high values by community Camping beaches, etc Small reserve in north gazetted for Broome Bird Observatory Indigenous population: the Bay and the Ramsar wetlands are significant to Yawuru people, at least 65 aboriginal heritage sites present							

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
Port Hedland-Eighty Mile Beach	Birds Important seabird rookery, important staging point/feeding area for migratory birds including curlew sandpiper (Critically Endangered)	4	3	N/A	Migration: Aug to Nov	Subsea LOWC: 641.8 Surface LOWC: 2,035	Subsea LOWC: 5.1 days Surface LOWC: 2.9 days	Medium
	Turtles Flatback turtle nesting on cemetery beach near Port Hedland and critical habitat from nesting along the coastline	3	2	-	Turtle nesting and breeding Nov to Mar with peak in late Dec/early Jan			Low
Karratha Port Hedland	Coral and other subsea benthic primary producers	3	4	N/A	Coral spawning: Mar and Oct	Subsea LOWC: 138.5 Surface LOWC: 972.1	Subsea LOWC: 7.6 days Surface LOWC: 6.6 days	Low
	Birds Important seabird rookery, important staging point/feeding area for migratory birds including curlew sandpiper (Critically Endangered)	4	3	N/A	Migration: Aug to Nov			Medium
	Turtles	3	3	-	Turtle nesting and breeding			Low

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
	Critical nesting and inter-nesting habitat for green turtles (Vulnerable), significant foraging populations of green, loggerhead turtles (Endangered) and hawksbill turtles (Vulnerable)				Nov to Mar with peak in late Dec/early Jan			
	Marine mammals Small dugong population (<50 individuals) Migratory pathway for pygmy blue whales	4	3	N/A	Pygmy blue whale migration: Apr to Aug			Medium
	Socio-economic and heritage Staging area for traditional Indonesian fishers Commercial tourism – recreation and scientific research	1	1	-	-			Low
Roebuck-Eighty Miley Beach	Birds Foraging area for Little tern and Roseate tern	3	2	N/A	Migration: Aug to Nov	Subsea LOWC: 340 Surface LOWC: 811.2	Subsea LOWC: 17.9 days Surface LOWC: 14.8 days	Low
	Turtles	3	2		Turtle nesting and breeding			Low

Santos

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
	Flatback turtle nesting and inter-nesting				Nov to Mar with peak in late Dec/early Jan			
	Marine mammals foraging dugong population	1	2	N/A	-			Low
Southern Island Coast	Seagrass meadows	1	2	N/A	-	Subsea LOWC: 315.6 Surface LOWC: 441	Subsea LOWC: 26.7 days Surface LOWC: 24.9 days	Low
	Birds Bird populations, including: Wedge tailed shearwater, Lesser crested tern, Fairy tern, Roseate tern.	4	3	N/A	-			Medium
	Turtles Green turtle and hawksbill critical habitat (nesting)	4	3	-	Turtle nesting and breeding Nov to Mar with peak in late Dec/early Jan			Medium

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)[12]	DoT Ranking (Dissolved oil)[19]	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
	Marine mammals Humpback whale BIA	4	3	N/A	-			Medium

Table 6-14: Initial response priorities during a surface marine diesel oil spill (surface spill)

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)	DoT Ranking (Dissolved oil)	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
Imperieuse Reef MP	Turtles Green turtles (Vulnerable) and hawksbill turtles (Vulnerable) known to be present – not regionally significant habitat	2	1	N/A	N/A	Bedout North: 1.6 Bedout South: NC	Bedout North: 9.4 days Bedout South: NC	Medium
	Marine mammals Humpback whale migration	2	1	N/A	Humpback whale migration: Jun to Jul			Low
	Birds Wide range of seabirds observed	2	1	N/A	N/A			
	Coral and other subsea benthic primary producers	3	4	N/A	Coral spawning: Mar & Oct			Medium
	Socio-economic Tourism - charter boats, diving and snorkelling. Recreational fishing (limited numbers due to distance from coast)	1	1	N/A	N/A			Low

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)	DoT Ranking (Dissolved oil)	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
Bedout Island	Turtles Foraging - loggerhead (Endangered), Green turtle (Vulnerable) and Hawksbill (Vulnerable). No known nesting	4	3	N/A	N/A	Bedout North: NC Bedout South: 52.8	Bedout North: NC Bedout South: 0.8 days	High
	Coral and other subsea benthic primary producers	3	4	Fringing island	Coral spawning: Mar & Oct			Low
	Birds Globally significant Brown Booby breeding location – migratory species	2	1	N/A	Breeding: May to Nov			Medium
Eighty Mile Beach	Ramsar wetland	5	5	220 km of beach and intertidal mudflats from Cape Missiessy to Cape Keraudren and Mandora Salt Marsh 40 km to the east	N/A	Bedout North: NC Bedout South: 1.4	Bedout North: NC Bedout South: 6.4 days	High
	Mangroves	3	4	Mandora Saltmarsh area	N/A			Medium

Protection Priority Area	Key sensitivities	DoT Ranking (Floating oil)	DoT Ranking (Dissolved oil)	Key locations	Relevant key periods	Maximum total accumulated oil ashore (tonnes) >100 g/m²	Minimum arrival time accumulated oil ashore >100 g/m² (days)	Initial response priority
	Turtles Flatback turtle nests (Vulnerable) at scattered locations along shoreline	3	2	N/A	Turtle nesting year-round, peak Oct to Feb			High
	Birds 97 wetland species, 42 of which are listed under international agreements.	4	3	Intertidal areas	Migration: Aug to Nov			High
	Socio-economic and heritage Tourism – camping and nature, recreational fishing. Wetlands significant to three local Aboriginal groups, several Aboriginal heritage sites present	1	1	N/A	N/A			Low

6.6.1 Tactical Response Plans for Priority Protection Areas

Tactical Response Plans (TRPs) have been developed for selected receptors, identifying suitable response strategies, equipment requirements, relevant environmental information and access and permit requirements. TRPs are referenced in both the activity/facility Oil Pollution First Strike Plan and Operational Plans. TRPs are to be used by the IMT for first strike and ongoing activities and to assist in informing the appropriate responses for inclusion in an IAP.

Not all PPA's require TRPs in place. The requirement for a TRP considers the time to contact to a PPA from accumulated or floating hydrocarbons in <10 days to contact (above the response planning thresholds in **Section 6.2**). The ten days allows two days to get services procured; six days to draft a TRP; and two days to implement. The Sensitivity ranking (HEV and DoT) is also considered. A TRP will also be considered should the impact from hydrocarbon be considerable (high accumulation, large floating oil contact). Where TRPs are unavailable for areas likely to be contacted, refer to other sources of information such as aerial photography, Oil Spill Response Atlas, Pilbara Region Oiled Wildlife Response Plan and WAMOPRA. Additionally, TRPs for contacted receptors will be sought from other operators where possible.

Table 6-15: Tactical Response Plans for Priority Protection Areas

PPA	TRP Evaluation	Existing TRP
Ashmore Reef AMP	No requirement for a TRP due to contact of floating/accumulated hydrocarbon >10 days (Section 6.3)	No
Eighty Mile Beach, Port Hedland-Eighty Mile Beach, Roebuck-Eighty Mile Beach	Existing TRP in place for Eighty Mile Beach.	Yes
Muiron Islands	Existing TRP in place for Muiron Islands	Yes
Ningaloo Coastline (North, South Middle)	Existing TRPs in place for: + Jurabi to Lighthouse Bay beaches + Mangrove Bay + Muiron Islands + Turquoise Bay + Yardie Creek	yes
Imperieuse Reef MP	Existing TRP in place for Imperieuse Reef MP	Yes
Clerke Reef MP	Existing TRP in place for Clerke Reef MP	Yes
Broome-Roebuck	Existing TRP in place for Roebuck Bay	Yes

PPA	TRP Evaluation	Existing TRP
Montebello Islands	Existing TRPs in place for: + Montebello 1: Claret Bay + Montebello 2: Sherry Lagoon entrance + Montebello 3: Hock Bay + Montebello 4: Stephenson Channel, north + Montebello 5: Hermite – Delta Island channel + Montebello 6: Champagne Bay – Chippendal Channel + Montebello 7: North Channel and Kelvin Channel	Yes
Barrow Islands	No requirement for a TRP due to contact of floating/accumulated hydrocarbon >10 days (Section 6.3) However: + NWS OSCP Volume 2: Environmental Resource Atlas- Barrow is covered	No
Lowendal Islands	No requirement for a TRP due to contact of floating/accumulated hydrocarbon >10 days (Section 6.3) However: + Lowendal Islands – Small Vessel Operating Guidelines	Yes
Dampier Archipelago	Full TRPs already exist for: + Dampier 1: Legendres Island + Dampier 2: Rosemary Island + Dampier 3: Enderby Island - lagoon	Yes
Bedout Island	**Yes** – high accumulation and early contact time <10 days. A TRP will be prepared for Bedout Island post drilling.	No
Karratha-Port Hedland	**Yes** - high accumulation and early contact time <10 days. A TRP will be prepared for Bedout Island post drilling.	No
Southern Islands Coast	No requirement for a TRP due to contact of floating/accumulated hydrocarbon >10 days (Section 6.3)	No

6.7 Net environmental benefit analysis

The IMT uses a NEBA, also referred to as a spill impact mitigation assessment (SIMA), to inform the incident action planning process (**Section 8**), so the most effective response strategies with the least detrimental environmental impacts can be identified, documented and executed.

The Environmental Team Leader will use the information in **Section 6.6** to identify and prioritise initial response priorities and apply the NEBA to identify which response strategies are preferred for the situation, oil type and behaviour, environmental conditions, direction of plume and priorities for protection.

As a component of the incident action planning process, NEBA is conducted by the Control Agency with responsibility for the spill response activity. Where there are different activities controlled by different IMTs, as in a cross-jurisdictional response between Santos and DoT, consultation will be required during the NEBA process such that there is consistency in the sensitivities prioritised for response across the Control agencies.

A strategic NEBA has been developed for all response strategies identified as applicable to credible spills identified in this OPEP, with the benefit or potential impact to each sensitivity identified (refer **Table 6-16** to **Table 6-17**). While not all spill response activities included in the strategic NEBA would be under the control of Santos during a spill incident, they have been included to assist the planning conducted by DoT.

In the event of a spill, NEBA is applied with supporting information collected as part of the Operational Monitoring Plan (**Section 10**) to achieve the following:

+ Identify sensitivities within the area potentially affected by a spill at that time of the year (noting that the sensitivity of some key receptors, such as birdlife and turtles, varies seasonally).
+ Assist in prioritising and allocating resources to sensitivities with a higher protection and response priority (**Table 6-13** to **Table 6-14**).
+ Assist in determining appropriate response strategies with support of real time metocean conditions, oil spill tracking and fate modelling.

When a spill occurs, NEBA is applied to the current situation, or operationalised. Operational NEBA Templates are filed within the Environment Unit Leader folder on the Santos ER Intranet site. To complete the Operational NEBA:

+ All ecological and socioeconomic sensitivities identified within the spill trajectory area are recorded.
+ Potential effects of response strategies on each sensitivity are assessed in terms of their benefit or otherwise to the socio-economic sensitivities.
+ All persons involved and data inputs have been considered for the analysis.

The Operational NEBA Form documents the decisions behind the recommendation to the Incident Commander on which resources at risk to prioritise, and the positives and negatives of response strategies to deploy. The Operational NEBA provides guidance to the IAPs and is revisited each Operational Period.

Table 6-16: Strategic net environmental benefit analysis matrix – Caley Condensate loss of well control (all scenarios)

Priority for Protection Area	No Controls	Source Control	Monitor and Evaluate	Containment and Recovery	Mechanical Dispersion	Surface Dispersant	Sub Sea Dispersant Injection	Shoreline Protection & Deflection	Shoreline Clean-Up	Oiled Wildlife Response	Scientific Monitoring
Imperieuse Reef MP											
Turtle habitat – green, hawksbill											
Coral and other subsea benthic primary producers								N/A	N/A	N/A	
Marine mammals – humpback whale migration											
Seabirds											
Tourism – charter boats, diving, snorkelling, recreational fishing											
Clerke Reef MP											
Turtle habitat – green, hawksbill											
Coral and other subsea benthic primary producers								N/A	N/A	N/A	

Priority for Protection Area	No Controls	Source Control	Monitor and Evaluate	Containment and Recovery	Mechanical Dispersion	Surface Dispersant	Sub Sea Dispersant Injection	Shoreline Protection & Deflection	Shoreline Clean-Up	Oiled Wildlife Response	Scientific Monitoring
Marine mammals – humpback whale migration											
Seabirds – significant breeding for migratory species at Bedwell Island											
Tourism – charter boats, diving, snorkelling, recreational fishing											
Ningaloo Coast North											
Turtle nesting – loggerhead, green											
Mangroves – Mangrove Bay and Yardie Creek										N/A	

Priority for Protection Area	No Controls	Source Control	Monitor and Evaluate	Containment and Recovery	Mechanical Dispersion	Surface Dispersant	Sub Sea Dispersant Injection	Shoreline Protection & Deflection	Shoreline Clean-Up	Oiled Wildlife Response	Scientific Monitoring
Coral and other subsea benthic primary producers – largest fringing reef in Australia, lagoonal, intertidal and subtidal corals, seagrass and macroalgae bed								N/A	N/A	N/A	
Whale sharks and manta rays											
Tourism – significant fishing/charter boat tourism, camping and use of nearshore sanctuary zones (fishing, snorkelling)											
Seabird nesting – incl. breeding areas at Mangrove Bay, Mangrove Point, Point Maud, Mildura wreck and Fraser Island											

Priority for Protection Area	No Controls	Source Control	Monitor and Evaluate	Containment and Recovery	Mechanical Dispersion	Surface Dispersant	Sub Sea Dispersant Injection	Shoreline Protection & Deflection	Shoreline Clean-Up	Oiled Wildlife Response	Scientific Monitoring
Humpback/pygmy blue whale migration											
Barrow Island											
Turtle nesting – particularly flatback (western side) and green turtles (eastern side)											
Mangroves and mudflats (shorebird foraging) – Bandicoot Bay										N/A	
Coral and other subsea benthic primary producers – incl. Biggada Reef								N/A	N/A	N/A	
Seabird nesting – incl. Double Island											
Migratory shorebirds – particularly Bandicoot Bay											

Priority for Protection Area	No Controls	Source Control	Monitor and Evaluate	Containment and Recovery	Mechanical Dispersion	Surface Dispersant	Sub Sea Dispersant Injection	Shoreline Protection & Deflection	Shoreline Clean-Up	Oiled Wildlife Response	Scientific Monitoring
Aboriginal listed sites incl. pearling camps											
Dampier Archipelago											
Turtles – hawksbill and flatback											
Mangroves										N/A	
Marine mammals – humpback whale migration											
Seabird breeding											
Coral and other subsea benthic primary producers								N/A	N/A	N/A	
Fishing/charter boat, camping tourism National Heritage, Aboriginal sites											

Priority for Protection Area	No Controls	Source Control	Monitor and Evaluate	Containment and Recovery	Mechanical Dispersion	Surface Dispersant	Sub Sea Dispersant Injection	Shoreline Protection & Deflection	Shoreline Clean-Up	Oiled Wildlife Response	Scientific Monitoring
Montebello Islands											
Turtle nesting – North West and Eastern Trimouille Islands (hawksbill); Western Reef, Southern Bay and North West Island (green)											
Mangroves – particularly Stephenson Channel										N/A	
Coral and other subsea benthic primary producers								N/A	N/A	N/A	
Seabird nesting											
Migratory shorebirds											
Humpback/pygmy blue whale migration											
Fishing/charter boat tourism											

Priority for Protection Area	No Controls	Source Control	Monitor and Evaluate	Containment and Recovery	Mechanical Dispersion	Surface Dispersant	Sub Sea Dispersant Injection	Shoreline Protection & Deflection	Shoreline Clean-Up	Oiled Wildlife Response	Scientific Monitoring
Muiron Islands											
Turtle nesting – major loggerhead site, significant Green turtle nesting site											
Coral and other subsea benthic primary producers								N/A	N/A	N/A	
Mangroves										N/A	
Seabird nesting											
Humpback whale migration											
Tourism – significant fishing/charter boat tourism											
Bedout Island											
Turtle foraging – loggerhead, green, hawksbill											
Coral and other subsea benthic primary producers								N/A	N/A	N/A	

Priority for Protection Area	No Controls	Source Control	Monitor and Evaluate	Containment and Recovery	Mechanical Dispersion	Surface Dispersant	Sub Sea Dispersant Injection	Shoreline Protection & Deflection	Shoreline Clean-Up	Oiled Wildlife Response	Scientific Monitoring
Seabird nesting											
Lowendal Islands											
Turtle nesting – hawksbill, loggerhead and green											
Mangroves										N/A	
Dugong foraging											
Coral and other subsea benthic primary producers								N/A	N/A	N/A	
Seabirds											
Tourism – charter boats, significant recreational fishing											
Eighty Mile Beach											
Ramsar wetland											
Turtle nesting – hawksbill, loggerhead and green											
Mangroves										N/A	

Priority for Protection Area	No Controls	Source Control	Monitor and Evaluate	Containment and Recovery	Mechanical Dispersion	Surface Dispersant	Sub Sea Dispersant Injection	Shoreline Protection & Deflection	Shoreline Clean-Up	Oiled Wildlife Response	Scientific Monitoring
Migratory shorebirds – foraging habitat											
Tourism – camping and fishing Aboriginal heritage sites											
Ashmore Reef AMP											
Turtle nesting and inter-nesting – green turtles. Foraging for green, loggerhead and hawksbill turtles											
Seabirds – important rookery and staging for migratory species											
Small dugong population, pygmy blue whale migration											
Coral and other subsea benthic primary producers								N/A	N/A	N/A	

Priority for Protection Area	No Controls	Source Control	Monitor and Evaluate	Containment and Recovery	Mechanical Dispersion	Surface Dispersant	Sub Sea Dispersant Injection	Shoreline Protection & Deflection	Shoreline Clean-Up	Oiled Wildlife Response	Scientific Monitoring
Tourism – recreation and scientific research Staging area for traditional Indonesian fishers,											
Broome-Roebuck Bay											
RASMAR site 84 waterbird species, 35 shorebird species, 47 of which are listed under CAMBA, JAMBA and ROKAMBA										N/A	
Flatback turtles nest in small numbers around Cape Villaret near southern end of the Bay											

Priority for Protection Area	No Controls	Source Control	Monitor and Evaluate	Containment and Recovery	Mechanical Dispersion	Surface Dispersant	Sub Sea Dispersant Injection	Shoreline Protection & Deflection	Shoreline Clean-Up	Oiled Wildlife Response	Scientific Monitoring
Small dugong population (<50 individuals) Migratory pathway for pygmy blue whales											
Tourism: recreational (increased visitation dry season at Crab Creek, Dampier Creek, Fishermans Bend, Bush Point)											
Port Hedland-Eighty Mile Beach											
Important seabird rookery, important staging point/feeding area for migratory birds including curlew sandpiper (Critically Endangered)											

Priority for Protection Area	No Controls	Source Control	Monitor and Evaluate	Containment and Recovery	Mechanical Dispersion	Surface Dispersant	Sub Sea Dispersant Injection	Shoreline Protection & Deflection	Shoreline Clean-Up	Oiled Wildlife Response	Scientific Monitoring
Flatback turtle nesting on cemetery beach near Port Hedland and critical habitat from nesting along the coastline											
Karratha-Port Hedland											
Coral and other subsea benthic primary producers										N/A	
Important seabird rookery, important staging point/feeding area for migratory birds including curlew sandpiper (Critically Endangered)											

Priority for Protection Area	No Controls	Source Control	Monitor and Evaluate	Containment and Recovery	Mechanical Dispersion	Surface Dispersant	Sub Sea Dispersant Injection	Shoreline Protection & Deflection	Shoreline Clean-Up	Oiled Wildlife Response	Scientific Monitoring
Critical nesting and interesting habitat for green turtles (Vulnerable), significant foraging populations of green, loggerhead turtles (Endangered) and hawksbill turtles (Vulnerable)											
Small dugong population (<50 individuals) Migratory pathway for pygmy blue whales											
Staging area for traditional Indonesian fishers Commercial tourism – recreation and scientific research										N/A	
Roebuck-Eighty Mile Beach											
Foraging area for Little tern and Roseate tern											

Priority for Protection Area	No Controls	Source Control	Monitor and Evaluate	Containment and Recovery	Mechanical Dispersion	Surface Dispersant	Sub Sea Dispersant Injection	Shoreline Protection & Deflection	Shoreline Clean-Up	Oiled Wildlife Response	Scientific Monitoring
Flatback turtle nesting and internesting											
foraging dugong population											
Southern Island Coast											
Seagrass meadows										N/A	
Bird populations, including: Wedge tailed shearwater, Lesser crested tern, Fairy tern, Roseate tern.											
Green turtle and hawksbill critical habitat (nesting)											

Legend

		Beneficial impact.
		Possible beneficial impact depending on the situation (e.g., time frames and metocean conditions to dilute entrained oil).
		Negative impact.
N/A		Not applicable for the environmental value or not applicable for hydrocarbon type

Table 6-17: Strategic net environmental benefit analysis matrix – marine diesel oil spills (all scenarios)

Priority for Protection Area	No Controls	Source Control	Monitor and Evaluate	Containment and Recovery	Mechanical Dispersion	Chemical Dispersants	Shoreline Protection & Deflection	Shoreline Clean-Up	Oiled Wildlife Response	Scientific Monitoring
Imperieuse Reef MP										
Turtle habitat – green, hawksbill										
Coral and other subsea benthic primary producers							N/A	N/A	N/A	
Marine mammals – humpback whale migration										
Seabirds										
Tourism – charter boats, diving, snorkelling, recreational fishing										
Bedout Island										
Turtle foraging – loggerhead, green, hawksbill										
Coral and other subsea benthic primary producers							N/A	N/A	N/A	

Priority for Protection Area	No Controls	Source Control	Monitor and Evaluate	Containment and Recovery	Mechanical Dispersion	Chemical Dispersants	Shoreline Protection & Deflection	Shoreline Clean-Up	Oiled Wildlife Response	Scientific Monitoring
Seabird nesting										
Eighty Mile Beach										
Ramsar wetland										
Turtle nesting – hawksbill, loggerhead and green										
Mangroves									N/A	
Migratory shorebirds – foraging habitat										
Tourism – camping and fishing Aboriginal heritage sites										
Legend										
	Beneficial impact.									
	Possible beneficial impact depending on the situation (e.g. time frames and metocean conditions to dilute entrained oil).									
	Negative impact.									
N/A	Not applicable for the environmental value or not applicable for hydrocarbon type.									

6.8 Oil spill response ALARP assessment

For each response strategy included within this OPEP an environmental performance outcome has been determined and key control measures and performance standards have been identified such that the response can meet the required performance outcome. For each response strategy, an ALARP assessment has been conducted to demonstrate that the control measures mitigate the risk of an oil spill to ALARP.

Appendix B details the ALARP assessment framework and the results of the ALARP assessment conducted to inform the control measures and performance standards contained within this OPEP.

7 External Notifications and Reporting Procedures

For oil spill incidents, the OSC (of the MODU or Company Site Representative) will notify the Perth-based IMT for delegation of further notifications to relevant Regulatory Authorities and for further spill response assistance for Level 2/3 spills.

7.1 Regulatory notification and reporting

The Incident Commander (IC) is to delegate the following regulatory reporting requirements. Typical delegated parties will be the Safety Officer and the Environment Unit Leader.

Contact details for the Regulatory agencies outlined in **Table 7-1** are provided within the Incident Response Telephone Directory (SO-00-ZF-00025.020).

Table 7-1 outlines the external regulatory reporting requirements specifically for oil spill incidents outlined within this OPEP in Commonwealth and State jurisdictions, noting that regulatory reporting may apply to smaller Level 1 spills that can be responded to using onsite resources as well as larger Level 2/3 spills.

State water notifications to WA DoT will apply to spills in State waters or spills originating in Commonwealth waters and moving to State waters.

Table 7-1 outlines Santos oil spill reporting requirements associated with carrying out a Petroleum Activity in State and Commonwealth waters. There are also additional requirements for Vessel Masters to report oil spills from their vessels under relevant marine oil pollution legislation (e.g. MARPOL). This includes, where relevant, reporting oil spills to AMSA (Rescue Coordination Centre) and WA DoT (MEER unit).

The Incident Response Telephone Directory (SO-00-ZF-00025.02) contains a more detailed list and contact details for incident response support and is updated every 6 months with up-to-date revisions available within the IMT room and online (intranet procedures and emergency response pages).

7.2 Activation of external oil spill response organisations and support agencies

Table 7-2 outlines notifications that should be made to supporting agencies to assist with spill response activities outlined within this plan. This list contains key oil spill response organisations that have pre-established roles in assisting Santos in an oil spill response. It is not an exhaustive list of all providers that Santos may use for assisting an oil spill response.

The Incident Response Telephone Directory (SO-00-ZF-00025.02) contains a more detailed list and contact details for incident response support and is updated every six months with up-to-date revisions available within the IMT room and online (intranet procedures and emergency response pages).

Table 7-1: External notification and reporting requirements (commonwealth, state and international waters)

Agency or Authority	Type of Notification/ Timing	Legislation/Guidance	Reporting Requirements	Responsible Person/Group	Forms
NOPSEMA Reporting Requirements for Commonwealth water spills					
NOPSEMA (Incident Notification Office)	Verbal notification within two hours Written report as soon as practicable, but no later than three days	*Petroleum and Greenhouse Gas Storage Act 2006* Offshore Petroleum Greenhouse Gas Storage (Environment) Regulations 2009 (as amended 2020)	A spill associated with Bedout Multi-Well Drilling activities in Commonwealth waters that has the potential to cause moderate to significant environmental damage[1]	Notification by Environment Unit Leader (or delegate)	Incident reporting requirements: https://www.nopsema.gov.au/environmental-management/notification-and-reporting/
National Offshore Petroleum Titles Administrator (NOPTA) (Titles Administrator)	Written report to NOPTA within seven days of the initial report being submitted to NOPSEMA	Guidance Note (N-03000-GN0926) Notification and Reporting of Environmental Incidents	Spill in Commonwealth waters that is reportable to NOPSEMA	Notification by Environment Unit Leader (or delegate)	Provide same written report as provided to NOPSEMA
National Offshore Petroleum Titles Administrator and WA Department of Mines, Industry	Written report to National Offshore Petroleum Titles Administrator and DMIRS within seven days of the initial report being submitted to NOPSEMA	Guidance Note (N-03000-GN0926) Notification and Reporting of Environmental Incidents	Spill in Commonwealth waters that is reportable to NOPSEMA	Notification by Environment Unit Leader (or delegate)	Provide same written report as provided to NOPSEMA

Agency or Authority	Type of Notification/ Timing	Legislation/Guidance	Reporting Requirements	Responsible Person/Group	Forms
Regulation and Safety (DMIRS)					
DMIRS Reporting Requirements for State water spills					
WA DMIRS	Verbal phone call within two hours of incident being identified Follow up written notification within three days	Guidance Note on Environmental Non-compliance and Incident Reporting	A spill associated with Bedout Multi-Well Drilling activities in State waters that has the potential to cause an environmental impact that is categorised as moderate or more serious than moderate[1]	Notification by Environment Unit Leader (or delegate)	Environmental and Reportable Incident/ Non-compliance Reporting Form http://www.dmp.wa.gov.au/Environment/Environment-reports-and-6133.aspx
DFAT Reporting Requirements for International waters spills					
Department for Foreign Affairs and Trade	Verbal notification within 24 hours of modelling suggesting trans-national migration of oil into Indonesian or Timor-Leste.	Not applicable	NOPSEMA, DISER and DFAT will form an inter-agency panel; the Australian Government Control Crisis Centre	Notification by Environment Unit Leader (or delegate)	Not applicable

Agency or Authority	Type of Notification/ Timing	Legislation/Guidance	Reporting Requirements	Responsible Person/Group	Forms
AMSA and DoT spill reporting requirements					
AMSA Rescue Coordination Centre (RCC)[2]	Verbal notification within two hours of incident	Under the MoU between Santos and AMSA	Santos to notify AMSA of any marine pollution incident[1]	Notification by Environment Unit Leader (or delegate)	Not applicable
WA Department of Transport (WA DoT)[2] (MEER Duty Officer)	+ Verbal notification within two hours + Follow up with Pollution Report as soon as practicable after verbal notification + If requested, submit Situation Report (**Appendix D**) within 24 hours of request	Emergency Management Regulations 2006 State Hazard Plan: Maritime Environmental Emergencies Offshore Petroleum Industry Guidance Note – Marine Oil Pollution: Response and Consultation Arrangements	Santos to notify of actual or impending Marine Pollution Incidents (MOP) that are in, or may impact, State waters Emergency Management Regulations 2006 define MOP as an actual or impending spillage, release or escape of oil or an oily mixture that is capable of causing loss of life, injury to a person or damage to the health of a person, property or the environment[1]	Notification by Environment Unit Leader (or delegate) MEER Duty Officer contacted per Incident Telephone Directory	WA DoT POLREP (**Appendix C**): https://www.transport.wa.gov.au/mediaFiles/marine/MAC-F-PollutionReport.pdf WA DoT SITREP (**Appendix D**): https://www.transport.wa.gov.au/mediaFiles/marine/MAC-F-SituationReport.pdf

Agency or Authority	Type of Notification/ Timing	Legislation/Guidance	Reporting Requirements	Responsible Person/Group	Forms
Protected areas, fauna and fisheries reporting requirements					
Commonwealth Department of Agriculture, Water and the Environment (Director of monitoring and audit section)	Email notification as soon as practicable	*Environment Protection and Biodiversity Conservation Act 1999*	If Matters of National Environmental Significance (MNES) are considered at risk from a spill or response strategy, or where there is death or injury to a protected species	Notification by Environment Unit Leader (or delegate)	Not applicable
Department of Biodiversity Conservation and Attractions (Pilbara Regional Office)	Verbal notification within two hours	DBCA consultation	Santos to notify AMSA of any marine pollution incident[1] Notify if spill has the potential to impact or has impacted wildlife in State waters (to activate the Oiled Wildlife Adviser)	Notification by Environment Unit Leader (or delegate)	Not applicable
Department of Biodiversity Conservation and Attractions (State Duty Officer and	Verbal notification within two hours	Western Australian Oiled Wildlife Response Plan	Notify if spill has the potential to impact or has impacted wildlife in State waters (to	Notification by Environment Unit Leader (or delegate)	Not applicable

Agency or Authority	Type of Notification/ Timing	Legislation/Guidance	Reporting Requirements	Responsible Person/Group	Forms
Pilbara Regional Office)			activate the Oiled Wildlife Adviser)		
Parks Australia (24-hour Marine Compliance Duty Officer)	Verbal notification as soon as practicable	Environment Protection and Biodiversity Conservation Act 1999	An oil spill which occurs within a marine park or are likely to impact on an Australian Marine Park	Notification by Environment Unit Leader (or delegate)	Not applicable, but the following information should be provided: + Titleholder's details + Time and location of the incident (including name of marine park likely to be affected) + Proposed response arrangements as per the OPEP + Confirmation of providing access to relevant monitoring and evaluation reports when available + Details of the relevant contact person in the IMT
Department of Primary Industry and Regional Development (DPIRD) Fisheries	Verbal phone call notification within 24 hours of incident	As per consultation with DPIRD Fisheries	Reporting of marine oil pollution[1]	Notification by Environment Unit Leader (or delegate)	Not applicable
Australian Fisheries Management Authority	Verbal phone call notification within 24 hours of incident	For consistency with DPIRD Fisheries notification	Reporting of marine oil pollution[1]	Notification by Environment Unit Leader (or delegate)	Not applicable

[1] *For clarity and consistency across Santos' regulatory reporting requirements, Santos will meet the requirement of reporting a marine oil pollution incident to NOPSEMA by reporting oil spills assessed to have an environmental consequence of moderate or higher in accordance with Santos' environmental impact and risk assessment process outlined in* ***Section 5*** *of the Bedout Multi-Well Drilling EP (SO-00-BI-20003).*

[2] *Santos reporting requirements only listed. For oil spills from vessels, Vessel Masters also have obligations to report spills from their vessels to AMSA Rescue Coordination Centre (RCC) and, in State waters, WA DoT MEER.*

Table 7-2: List of spill response support notifications

Organisation	Indicative Timeframe	Type of Communication	Resources Available	Activation instructions	Santos person responsible for activating
AMOSC Duty Manager	As soon as possible but within two hours of incident having been identified	Verbal Service Contract	Santos is a Participating Company in AMOSC and can call upon AMOSC personnel and equipment (including oiled wildlife). Under the AMOSPlan, Santos can also call upon mutual aid from other trained industry company personnel and response equipment AMOSC's stockpiles of equipment include dispersant, containment, recovery, cleaning, absorbent, oiled wildlife and communications equipment. Equipment is located in Geelong, Fremantle, Exmouth and Broome	**Step 1.** Obtain approval from Incident Commander to mobilise AMOSC. **Step 2.** Notify AMOSC that a spill has occurred. Put on standby as required – activate if spill response escalates in order to mobilise spill response resources consistent with the AMOSPlan. **Step 3.** E-mail confirmation and a telephone call to AMOSC will be required for mobilisation of response personnel and equipment, and callout authorities will be required to supply their credentials to AMOSC. A signed service contract must also be completed by a call out authority and returned to AMOSC prior to mobilisation.	Environment Unit Leader (or delegate) will notify AMOSC (upon approval from Incident Commander)
Aviation Service Provider	Within two hours of incident having been identified	Verbal	Helicopters/pilots available for aerial surveillance. Contract in place	Phone call.	Logistics Section Chief (or delegate)
Duty Officers/ Incident Commanders **(Woodside, BHP, Chevron)**	Within two hours of incident having been identified	Verbal	Mutual aid resources (through AMOSC mutual Aid Arrangement)	Phone call.	Incident Commander (or delegate)

Organisation	Indicative Timeframe	Type of Communication	Resources Available	Activation instructions	Santos person responsible for activating
Exmouth Freight & Logistics	Within two hours of incident having been identified	Verbal	Assistance with mobilising equipment and loading vessels	Phone call.	IMT Logistics Section Chief (or delegate)
North West Alliance – Waste	As required for offshore and shoreline clean-up activities	Verbal	Santos has contract arrangements in place with North West Alliance to take overall responsibility to transport and dispose of waste material generated through clean-up activities	Phone call to the Primary Contact Person. In the event the Primary Contact Person is not available, the Secondary Contact Person will be contacted.	IMT Logistics Section Chief (or delegate)
Astron	Scientific Monitoring Plan initiation criteria are met (**Section 18**)	Verbal and written	Astron has been contracted by Santos to provide Standby Services for Scientific Monitoring Plans (SMPs) 1 to 11. This includes provision of personnel and equipment. Astron annually reviews the SMPs for continual improvement	**Step 1.** Obtain approval from Incident Commander to activate Astron for Scientific Monitoring. **Step 2.** Verbally notify Astron followed by the submission of an Activation Form (Environment Unit Leader Folder) via email. **Step 3.** Provide additional details as requested by the Astron Monitoring Coordinator on call-back. **Step 4**. Astron initiates Scientific Monitoring Activation and Response Process.	Environment Unit Leader (or delegate)
Intertek Geotech (WA) Environmental Services and Ecotoxicology	When characterisation of oil is activated (**Section 10.6**)	Verbal	Oil analysis including gas chromatography/mass spectrometry fingerprinting	Phone call.	Environment Unit Leader (or delegate)
Oil Spill Response	Within two hours of incident having been identified	Verbal OSRL Mobilisation	Santos has a Service Level Agreement with OSRL, which includes the provision of support functions,	**Step 1**. Contact OSRL Duty Manager in Singapore and request assistance from OSRL.	Designated call-out authorities (including

Santos

Organisation	Indicative Timeframe	Type of Communication	Resources Available	Activation instructions	Santos person responsible for activating
Limited, OSRL Duty Manager		Authorisation Form	equipment and personnel to meet a wide range of scenarios At minimum OSRL will provide technical support to the IMT and place resources on standby Further details available on the OSRL webpage.	**Step 2**. Send notification to OSRL as soon as possible after verbal notification. **Step 3**. Upon completion of the OSRL incident notification form, OSRL will plan and place resources on standby.	Incident Commanders)
The Response Group	As soon as possible but within two hours of incident having been identified	Verbal and written	Santos has arrangements with TRG for the provision of trained field response personnel	Contact TRG Duty Officer	Designated call-out authorities (including Incident Commanders)
RPS Group	As soon as possible but within two hours of incident having been identified	Verbal and written	Santos has an agreement in place with RPS Group to allow rapid marine hydrocarbon spill modelling capability to be activated at any time during activities, which will be undertaken for any spill greater than Level 1. AMOSC can also run modelling on behalf of Santos, if required, as part of contracting arrangements with RPS Group	Contact RPS Group Duty Officer.	Environment Unit Leader (or delegate)

Organisation	Indicative Timeframe	Type of Communication	Resources Available	Activation instructions	Santos person responsible for activating
Wild Well Control (WWC)	Within four hours of a loss of well control incident having been identified	Loss of well control only Verbal	Well intervention services. Under contract.	**Step 1**. Following Santos management confirmation of a LOWC, the Source Control Branch Director is to call the Wild Well Control 24-hour emergency hotline number to notify WWC of the incident. **Step 2**. As soon as practical after initial notification and once the scale of the subsea loss of containment is confirmed, an emergency mobilisation authorisation form (saved in ECM) must be filled out, signed off by the authorised Santos Manger sent through to WWC. The form is located on the Santos Intranet Procedures Index under Emergency Procedures (http://ausintranet.enerylimited.com/dept_data/Procedure_data/index.htm). Email as directed by WWC point of contract provided by the emergency hotline attendant.	Source Control Branch Director

7.3 Environmental performance

Table 7-3 lists the Environmental Performance Standards and Measurement Criteria for external notifications and reporting.

Table 7-3: Environmental performance – external notification and reporting

Environmental Performance Outcome	Make notifications and reports within regulatory and defined timeframes.		
Response Strategy	**Control Measures**	**Performance Standards**	**Measurement Criteria**
External notifications and reporting plan	**Response Preparedness**		
	Incident Response Telephone Directory (SO-00-ZF-00025.02)	Incident Response Telephone Directory is revised every six months	Document revision history
	OPEP Communications Test	OPEP contact details for regulatory and service provider notifications are checked annually	Test records
	Response Implementation		
	External notifications and reporting tables	External notification and reporting undertaken as per **Table 7-1** and **Table 7-2**	Incident Log

8 Incident Action Planning

Santos incident response personnel use the incident action planning process to guide the incident response and to develop IAPs. All stakeholders involved in the incident achieve unity of effort through application of the disciplined planning process.

The incident action planning process is built on the following phases:

1. Understand the situation.
2. Establish incident priorities, objectives and tasks.
3. Develop a plan (IAP).
4. Prepare and disseminate the plan.
5. Execute, evaluate and revise the plan for the next operational period.

The Santos IMT will use the IAP process to determine and document the appropriate response priorities, objectives, strategies and tasks to guide the incident response which are reviewed and updated as more information becomes available.

The Santos IAP process is built on the phases described in **Figure 8-1**.

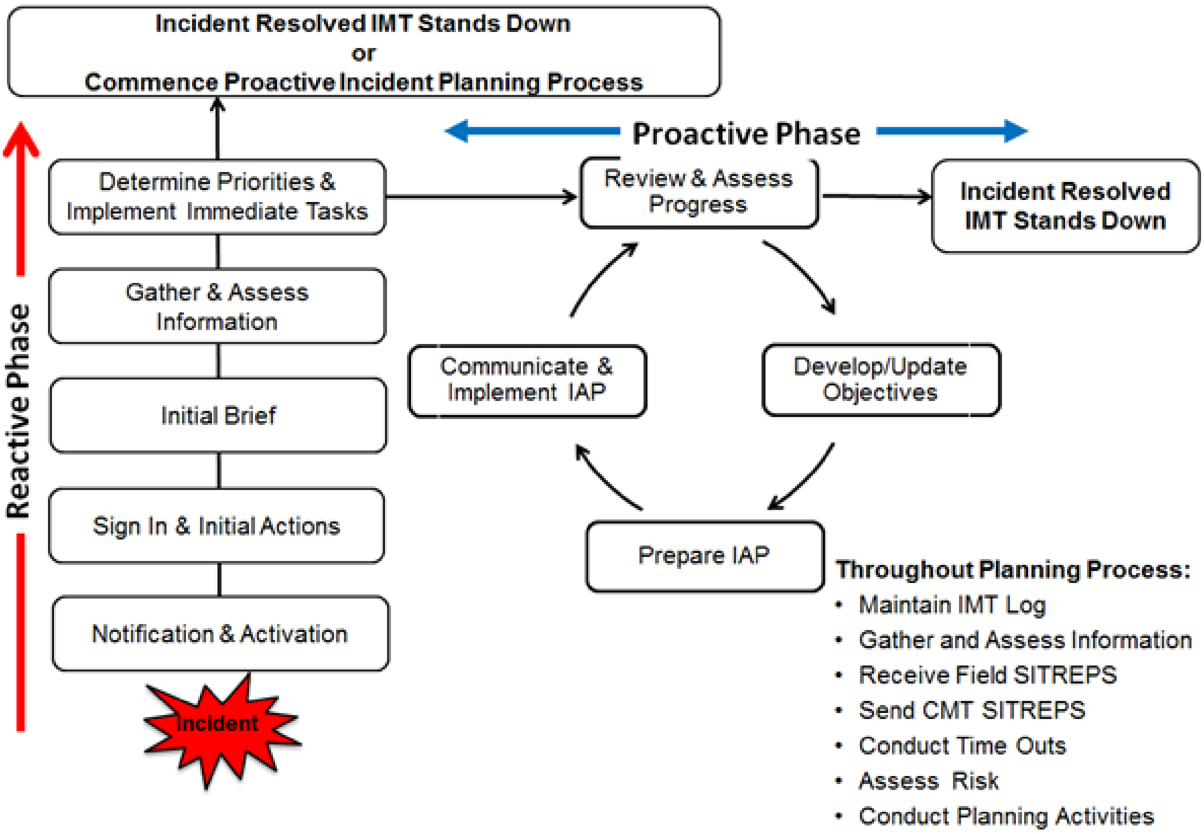

Figure 8-1: Incident Action Plan process

8.1 Reactive phase planning

The initial phase of the incident action planning process can be considered a reactive phase (indicatively lasting up to 48 hours) where information on the incident is being progressively established through reports coming in from the field. During this phase there is no formal Incident Action Plan to follow (given the incident has just begun and details are still being established) however the OPEP (this document) has been prepared to contain all first strike oil spill response actions required to be followed during this phase in lieu of a formal IAP.

First strike response actions are summarised in **Section 2** and provide links to relevant oil spill strategy sections within the OPEP which contain a more detailed list of implementation actions and considerations as well as statements of performance (performances standards) that must be followed to ensure the initial response meets regulatory requirements and environmental performance outcomes.

For each credible oil spill scenario covered by this OPEP the first strikes response actions, have been informed by a pre-assessment of applicable oil spill response strategies, priority response locations and a strategic NEBA also referred to as a SIMA. This pre-planning is included in **Section 6**. During the reactive phase the strategic NEBA is to be reviewed and, using the specific information gathered from the spill, operationalised into an operational NEBA (**Section 6.7**). This assessment helps verify that the response strategies pre-selected for each spill scenario are providing the best environmental outcome for the incident response.

8.2 Developing an Incident Action Plan

At the end of the reactive phase where the incident specifics have been determined, a more formal phase of spill response is entered whereby a documented IAP is developed to guide the incident response activities for the next operational period. An operational period is defined as the period scheduled for execution of actions specified in the IAP. The next operational period is nominally a daily period but, for long running incidents, may be extended further where the pace of the incident response has settled and the level of new information has decreased.

As IAPs and response strategies are implemented their performance is monitored. The performance measurement results are fed back into the IMT to provide the IMT with greater situational awareness to enable the effective formulation of following IAPs. Those response strategies that are effective are continued or increased, while those strategies that are ineffective are scaled back or ceased.

The performance against the objectives of the IAP must be documented in the Incident Log by the IMT. This provides the IMT with information required to assist in formulating the following IAP and provides evidence of Santos' response to the incident for regulatory and legal investigations that will follow the termination of the incident.

IAP performance is monitored through IMT communication with in-field response personnel both verbally and through logs/reports/photos sent throughout the response (e.g. surveillance personnel, team leaders, laboratory chemists) who report on the effectiveness of the response strategies.

IAP forms and processes are documented in the *Incident Command and Management Manual* (SO-00-ZF-00025) and in the 'Emergency Response' folder sets at *L:\Resource\Emergency Response\Incident-Exercise Number-Name*. Begin the response by copying and saving *Incident-Exercise Number-Name* folder set with a unique incident name and Id number on the lead folder; this is the Incident Log. Access subfolders to display all forms required to conduct incident action planning. Each functional position within the IMT and CMT has subfolders carrying forms and processes unique to the functional position.

8.3 Environmental performance

Table 8-1 lists the Environmental Performance Standards and Measurement Criteria for incident action planning.

Table 8-1: Environmental performance – incident action planning

Environmental Performance Outcome	Manage incident via a systematic planning process		
Response Strategy	**Control Measures**	**Performance Standards**	**Measurement Criteria**
Incident Action Planning	**Response Preparedness**		
	IMT Exercise and Training Plan	Incident Action Planning and NEBA is practiced by the IMT during exercises	Exercise records
	Incident Management Personnel	Incident Management personnel are trained and available as per **Appendix J: IMT Resourcing.**	Manual compliance check on IMT and CMT Membership contracts with AMOSC and OSRL
	Tactical Response Plans	Tactical response plan will be written for Bedout Island and Karratha-Port Hedland prior to activity commencement.	TRP
		If operational monitoring shows that shoreline contact of Protection Priority Areas is likely, TRPs will be developed or sought from other titleholders/ regional industries prior to shoreline contact.	TRP
	Response Implementation		
	Incident Action Plan	Incident Action Plan is completed for each operational period and approved by the Incident Commander	Incident Log Incident Action Plan/s
		Monitor effectiveness of response strategies being implemented and use information in the development of IAPs	Incident Log Incident Action Plan/s
	NEBA	An operational NEBA will be undertaken for each operational period of the incident	NEBA Incident Action Plan
	IMT activation and de-escalation	IMT will be activated Immediately once notified of a level 2/3 spill (to Incident Commander).	Incident Action Plan

Environmental Performance Outcome	Manage incident via a systematic planning process		
Response Strategy	**Control Measures**	**Performance Standards**	**Measurement Criteria**
		The decision to de-escalate the IMT will be made in consultation with the relevant Control Agency/s, Jurisdictional Authorities and other Statutory Authorities that play an advisory role.	NEBA Incident Action Plan

9 Source Control Plan

The initial and highest priority response to an oil spill incident following the health and safety of onsite personnel is to prevent or limit further loss of hydrocarbons to the environment.

For major hydrocarbon release incidents during Bedout Multi-Well Drilling activities, the MODU Operator's Emergency Response Plan and the Santos-MODU Operator Emergency Response Bridging Plan outline the initial actions to be taken by onsite personnel to control the source of a hydrocarbon spill and limit the volume released to the environment.

For vessels with a SOPEP, the SOPEP will provide the relevant initial actions to control the source of a vessel spill.

For the ongoing response to a LOWC incident, the Santos Offshore Source Control Planning and Response Guideline (DR-00-OZ-20001) is to be consulted as the overarching source of information for implementing a relief well response.

The sections below provide an outline of source control activities noting that the MODU Operator's Emergency Response Plan, Vessel SOPEP and Source Control Planning and Response Guideline (DR-00-OZ-20001), where applicable, will provide a higher level of detail for specific incidents.

9.1 Hydrocarbon storage or fuel tank rupture

Table 9-1 provides the environmental performance outcome, initiation criteria and termination criteria for source control response to a fuel tank rupture. The OSC and/or Incident Commander is ultimately responsible for implementing the response, and may therefore determine that some tasks be varied, should not be implemented or be reassigned.

Table 9-1: Fuel tank rupture – source control environmental performance outcome, initiation criteria and termination criteria

Environmental Performance Outcome	Implementation of source control methods to stop the release of hydrocarbons into the marine environment	
Initiation criteria	Notification of a spill	
Applicable hydrocarbons	**Caley Condensate**	**MDO**
	✗	✓
Termination criteria	Release of oil to the marine environment has ceased and the workplace environment is deemed environmentally safe and free of hydrocarbons	

9.1.1 Implementation guidance

Implementation guidance is summarised in **Table 9-2**. In the event MDO is released from a vessel due to a tank rupture, the relevant vessel specific procedures will be applied. For support vessel collisions, the vessel's SOPEP will be followed to control the source, reduce the loss of hydrocarbons and prevent escalation of the incident.

Table 9-2 lists the environmental performance standards and measurement criteria for this strategy.

Table 9-2: Implementation guidance – fuel tank rupture

Action		Consideration	Responsibility	Complete
Initial Actions	The vessel's SOPEP, as applicable under MARPOL, or procedure for responding to a ruptured tank will be followed as applicable.	Notwithstanding vessel specific procedures for source control, the following activities would be immediately evaluated for implementation providing safe to do so: + Reduce the head of fuel by dropping or pumping the tank contents into an empty or slack tank. + Consider pumping water into the leaking tank to create a water cushion to prevent further fuel loss. + If the affected tank is not easily identified, reduce the level of the fuel in the tanks in the vicinity of the suspected area if stability of the vessel will not be compromised. + Evaluate the transfer of fuel to other vessels. + Trim or lighten the vessel to avoid further damage to intact tanks. + Attempt repair and plugging of hole or rupture.	Vessel Master	❑

9.2 Loss of well control

Table 9-3 provides the environmental performance outcome, initiation criteria and termination criteria for controlling the source of a well leak.

Table 9-3: Loss of well control – source environmental performance outcome, initiation criteria and termination criteria

Environmental Performance Outcome	Implementation of source control methods to stop the release of hydrocarbons into the marine environment	
Initiation criteria	LOWC	
Applicable hydrocarbons	**Caley Condensate**	**MDO**
	✓	✗
Termination criteria	The primary well is contained and killed to prevent any further release of hydrocarbon to the environment	

Santos identified the worst-case credible oil spill scenarios for assessment as:

+ a subsea LOWC with the release of 10,982,250 STB (1,745,986 m^3) and 19,255 MMscf (545.25 million sm^3) gas at the seabed
+ a surface LOWC with the release of 10,858,774 STB (1,746,355 m^3) and 19,039 MMscf (539.12 million sm^3) gas at the sea surface

9.2.1 Source control methods

9.2.1.1 Emergency blow-out preventer activation

As part of the drilling programme, a blow-out preventor (BOP) stack will be installed prior to drilling of the reservoir well sections, in accordance with API Standard 53: *Well control equipment systems for drilling wells* (API, 2018). The purpose of a BOP is to provide a secondary barrier to hydrocarbons by providing a mechanical means of shutting in the well if primary well control is lost, and hydrocarbons enter the wellbore.

BOP Activation

If primary well control actions have failed and a loss of well control incident is anticipated, or is occurring, the drilling crew will initiate emergency BOP activation procedures immediately to shut in the well.

The BOP choke and kill lines will be closed and the relevant BOP rams will be activated, via the BOP control panel located in the drill shack. There is an additional BOP control panel located on the MODU bridge. Available BOP rams commonly include:

+ **pipe ram:** Seals the wellbore by sealing around drill pipe of a specific size
+ **variable-bore ram:** Seals the wellbore by sealing around various sizes of drill pipe
+ **blind ram:** Seals the wellbore when there is no tubing across the BOP
+ **blind-shear ram:** Seals the wellbore by cutting through and displacing drill pipe/tubing.

One or more of the BOP rams may be activated depending on the status of the well and the severity of the well control incident. Once a BOP ram is closed, a secondary locking mechanism activates which serves to lock the BOP ram in the closed position, even in the event of a subsequent loss of electrical or hydraulic power.

Sealing the wellbore in this manner provides an important safety barrier. It also allows the drill crew time to consider and plan actions to bring the well back under primary control.

9.2.1.2 Subsea first response toolkit

If a subsea LOWC was to occur, the site would require a detailed assessment to determine the most suitable intervention methods for the incident. This may be achieved through the use of remotely operated vehicles (ROVs) (supplied by Santos via existing contractual arrangements) and the AMOSC Subsea First Response Toolkit (SFRT). The SFRT includes debris clearance equipment. The SFRT also includes subsea dispersant equipment including a dedicated dispersant stockpile of Dasic Slickgone NS (500 m^3) (refer to **Table 13-11**).

In the event of a loss of well control incident, Santos will mobilise the SFRT from Fremantle to Dampier for transhipment to a suitable vessel for transport to, and deployment at, the incident location. The SFRT and dispersants are located at Oceaneering's facilities at Jandakot. If required, the equipment would be mobilised via road from Jandakot to Dampier. It is estimated this would take ten hours to arrange and up to five days to load and transport to Dampier, depending on the time of the year. A suitable vessel would be acquired by Santos during this timeframe and arrive in Dampier within eight days of call-out. Once the equipment is loaded, the vessel will mobilise to site and be ready to commence operations by day nine from call out. Specialist personnel to deploy the SFRT will be provided via Santos' contract with Oceaneering and will be available in Dampier within 72 hours (three days). Vessel specifications are outlined in the Santos Source Control Planning and Response Guideline (DR-00-ZF-20001).

9.2.2 Relief well planning

Relief well planning is embedded into the Santos Drilling & Completions Management Process (DCMP). The following industry accepted guidelines have been adopted to assist relief well planning requirements:

+ SPE Calculation of Worst Case Discharge Rev 1, 2016: This is used as part of the prospect screening review to generate a credible rate for oil spill modelling, as well as providing an input for the dynamic kill modelling as part of the Well Specific Source Control Plan.
+ United Kingdom Oil and Gas Relief Well Guidelines, Issue 2, 2013: This methodology is used to confirm a well complexity analysis and tailor required content for the Well Specific Source Control Plan to the appropriate level of detail.

All wells drilled during Bedout Multi-Well Drilling activities will have well-specific source control plans (SCPs). SCPs will be developed as required for individual wells or as campaign specific SCPs should a series of similar wells be drilled together or in succession. The SCP is a Santos controlled document and is encompassed in the well operation management plan (WOMP) that relates to the specific drilling activity.

All SCPs will contain relief well planning information, specifically:

+ MODU positioning assessment for relief well drilling locations
+ relief well tangible equipment requirements and availability
+ relief well trajectory analysis and casing design
+ dynamic well kill hydraulic simulation results.

These reports are static reports developed prior to higher-risk campaign-specific activities (drilling activities). While they contain planning that would be relevant to drilling a relief well for any well release (e.g. MODU positioning locations), time-variable information, such as MODU availability, is only assessed for the duration of the campaign.

To ensure Santos has current MODU availability, Santos maintains a register of MODU activity within the region and updates this on a monthly basis. The relief well rig capability register includes information about:

+ rig name
+ rig contract status (Operator and contract duration)
+ current location
+ maximum water depth capability
+ rig type (Floating vs jack-up; mooring type; Rig Design/Class)
+ available drilling envelope
+ BOP specifications
+ BOP connector specifications
+ mud pumps specifications/capability
+ choke and kill line internal diameters
+ storage capability (i.e., diesel, base-oil, brine, drill-water, potable water, bulks)
+ NOPSEMA safety case (yes/no).

The SCP will also include relief well planning that involves a review of the most recent rig capability register to identify the most suitable MODU for the well. In the event a suitable MODU is not in Australian waters, or is not predicted to be in Australian waters at the time of the activity, further work will be completed to identify a regionally suitable MODU, along with a mobilisation plan that demonstrates construction of a relief well within the time frame outlined in **Table 9-4** is achievable. Typically, these source control plans are signed 6-8 months prior to spud. Once a rig is allocated as a potential relief well MODU for a project, the rig capability register will be annotated as such. As such, any change to the register on a month-to-month basis that affects a preferred rig will trigger a revision to the SCP for that particular well. The review will be completed within 4 weeks of identifying the change.

As part of the DCMP, an Assurance Review is held with the D&C Manager in the weeks prior to spud. Santos commits to reviewing the Source Control Plan assumptions for relief well MODU availability and verifying that a suitable relief well MODU is either in Australian Waters, or there is a suitably robust plan in place to mobilise one outside of Australia. The activity will not proceed if there is not a least one relief well MODU option than could execute a relief well within the timeframes committed to in **Table 9-4**. In addition, during the activity, if the preferred relief well MODU/s becomes unavailable, work will commence on an update on the SCP to identify a suitable replacement MODU regionally along with any required pre-work (contracting/logistics plans etc.).

In order to facilitate and expedite the use of regional MODU for relief well drilling an Australian Petroleum Production & Exploration Association (APPEA) Memorandum of Understanding: Mutual Assistance is in place. This agreement provides the mechanism to facilitate the transfer of drilling units and well-site services between operators in Australian and Timor-Leste administered waters in order to respond urgently to emergency source control events.

A Safety Case Revision will be required for the relief well rig to undertake the activity; this cannot be submitted before the event. The Safety Case Revision will be based on existing documents, specifically the Safety Case Revision approved for the drilling of the original well and the Safety Case in force for the relief well rig. A Safety Case Revision would be submitted within 14 days from the well leak, however the critical path time allowed for the actual writing of the document is three days. The remaining estimated time would be used for gathering post-event data, mobilising the workforce and conducting a hazard identification. It is not practicable to reduce the critical path days with additional pre-planning as document revision, final review and approval will still be required after completing the hazard identification.

9.2.3 Relief well schedule

An indicative relief well drilling schedule is provided in **Table 9-4**. This is based on control of the well by 11 weeks (77 days). This period is used as a base case well control timeframe by Santos across its wells and is based on indicative mobilisation durations, relief well planning and operations. It could take up to 33 days to have a MODU onsite ready to spud.

This timeline has been assessed as ALARP based on the current controls/measures in place; however, Santos is actively working with industry to evaluate measures to improve on the ALARP response time model through the APPEA Drilling Industry Steering Committee Source Control Response Industry (SCRI) Working Group. The SCRI working group is an APPEA Drilling Industry Steering Committee initiative which has been established to drive collaboration and continuous improvement in source control emergency response planning. The Working Group will explore and act on opportunities to align and strengthen the Titleholders' source control emergency response capability through "mutual aid" initiatives and drive continuous improvement by implementing fit-for-purpose and effective source control emergency response strategies.

Table 9-4: Schedule for mobile offshore drilling unit arriving onsite

LOWC Relief Well		
Task	**Duration (in days)**	**Controls**
Event reported Begin sourcing of rig for relief well drilling operations. Concurrently, stand up relief well drilling team and activate relief well specialists.	2	+ On-site communications + Active IMT, including Operations Section Chief, Source Control Branch Director and Relief Well Team Lead + Stood-up Relief Well Team (as per Santos Offshore Source Control Planning and Response Guideline (DR-00-OZ-20001) + Relief Well Drilling specialist services contract (Wild Well Control) + Regional MODU tracking + APPEA MoU: Mutual Assistance
Relief well MODU confirmed. Relief well MODU suspends operations and prepares to mobilise to relief well location. Demobilisation of equipment from previous operator Concurrently, prepare relief well MODU Safety Case Revision and submit to NOPSEMA. Concurrently, prepare relief well design and dynamic kill plan. Prepare relief well WOMP and submit to NOPSEMA.	7	+ Active IMT + Santos Offshore Source Control Planning and Response Guideline (DR-00-OZ-20001) + Pre-completed well specific Source Control Plan complete with relief well study + Relief Well Drilling specialist services contract (Wild Well Control) + Regional MODU tracking + APPEA MoU: Mutual Assistance + Pre-verified access to relief well long lead equipment (e.g. casing and wellhead + Drilling services contracted.
Contract relief well MODU. Concurrently, continue preparations for rig mobilisation. Concurrently, NOPSEMA assessment of relief well MODU SCR and relief well WOMP. Mobilise relief well MODU to location.	24	+ Active IMT + Santos Offshore Source Control Planning and Response Guideline (DR-00-OZ-20001) + Relief Well Drilling specialist services contract (Wild Well Control)
Total days prior to arrival, ready to spud/commence relief well operations	**33**	
Drill and construct relief well and complete dynamic well kill operations	44	+ Active IMT + Santos Offshore Source Control Planning and Response Guideline (DR-00-OZ-20001) + Relief Well Drilling specialist services contract (Wild Well Control)
Total days from LOWC to well kill	**77**	

9.2.4 Source Control implementation guidance

Relief well drilling is the primary source control strategy to control a LOWC (subsea and surface) during Bedout Multi-Well Drilling activities. The installation of a subsea Capping Stack is not considered applicable (refer **Table 6-11**).

The Source Control Planning and Response Guideline (DR-00-OZ-20001) outlines the overarching process for planning and mobilising personnel and equipment into the field for the purpose of drilling a relief well.

A high-level summary of relief well Implementation actions is provided in **Table 9-5**.

Table 9-5: Implementation guidance – loss of well control

	Action	Responsibility	Complete
Initial Actions	**Relief well**		
	Implement the Source Control Planning and Response Guideline (DR-00-OZ-20001).	Relief Well Team Leader	❑
	Notify Santos Drilling and Completions Team to assemble a Source Control Branch and immediately begin preparations.	Relief Well Team Leader	❑
	Notify well control service provider personnel for mobilisation.	Relief Well Team Leader and Source Control Branch Director	❑
	Source MODU through nearby drilling operations if available or procure from nearest operator through mutual aid agreement MoU.	Source Control Branch Director	❑
	Refine, as necessary, the relief well pre-planned work described in **Section 9.2.2** to reflect the actual depths and asses the suitability of well locations.	Source Control Branch Director	❑
	Assess relief well equipment and personnel requirements. Procure and make ready.	Logistics Section Chief	❑
	Deploy equipment and personnel to site to begin spud and drill.	Relief Well Team Leader	❑
Ongoing actions	**SFRT**		
	Activate Subsea First Response Toolkit (SFRT) equipment. Activate Oceaneering personnel for deployment	Designated call-out authority (Incident Commander) Source Control Branch Director	❑
	Contract suitable vessel capable of deploying SFRT equipment and dispersant.	Logistics Section Chief Source Control Branch Director	❑
	Arrange road transport of SFRT equipment and dispersant from Jandakot to Dampier.	Logistics Section Chief Source Control Branch Director	❑
	Arrange equipment to be loaded on to vessel once in Dampier and authorise transit to field.	Logistics Section Chief Operations Section Chief Source Control Branch Director	❑

	Action	Responsibility	Complete
	Conduct initial ROV survey at the release point to determine the nature of the release, behaviour of the oil, and estimate the oil and gas flow rates.	Operations Section Chief Source Control Branch Director	❑
	Relief well		
	Design Relief Well, using relief well pre-planning work, as applicable, and have prepared in time to procure equipment and personnel prior to MODU arrival on location.	Source Control Branch Director	❑
	Assess relief well equipment and personnel requirements. Procure and make ready.	Logistics Section Chief	❑
	Deploy equipment and personnel to site to begin spud and drill.	Relief Well Team Leader	❑
	Monitor progress of relief well drilling and communicate to IMT.	Relief Well Team Leader	❑

9.3 Environmental performance

Table 9-6 indicates the environmental performance outcomes, controls and performance standards for the Source Control response strategy.

Table 9-6: Environmental performance – source control

Environmental Performance Outcome	Implementation of source control methods to stop the release of hydrocarbons into the marine/onshore environment.		
Response Strategy	**Control Measures**	**Performance Standards**	**Measurement Criteria**
Response Preparedness			
Source control – BOP Activation	BOP Unit	BOP rams pressure/function tested as per latest edition of API Standard 53 on deployment, and then at regular intervals throughout the drilling programme.	BOP pressure and function tests recorded in Daily Drilling Report. Pressure tests charted.
Source control - SFRT	Arrangements to enable access to SFRT equipment and personnel	Maintenance of access to SFRT equipment and personnel	AMOSC SFRT participating member OTA Agreement with Oceaneering
	Arrangements in place to monitor availability of vessels capable of transporting SFRT	Vessel availability shall be monitored regularly via Santos' contracted vessel broker	Shipbroker reports
	Maintenance of MSAs with multiple vessel providers	Santos maintains MSAs with multiple vessel providers	MSAs with multiple vessel providers
Source control – relief well drilling	Source Control Planning and Response Guideline (DR-00-OZ-20001)	The Source Control Planning and Response Guideline (DR-00-OZ-20001) is in place and up to date during the activity	Source Control Planning and Response Guideline (DR-00-OZ-20001)
	Relief Well Rig Capability Register	Relief Well Rig Capability Register is maintained during the activity through monthly monitoring	Relief Well Rig Capability Register
	Well-specific Source Control Plan developed prior to drilling	Source control plan will identify suitable rig availability for relief well drilling.	Well specific Source Control Plan

Environmental Performance Outcome	Implementation of source control methods to stop the release of hydrocarbons into the marine/onshore environment.		
Response Strategy	**Control Measures**	**Performance Standards**	**Measurement Criteria**
	Suitable relief well MODU confirmed to be available prior to drilling	Activity will not proceed if there is not a least one relief well MODU option than could execute a relief well within the timeframes committed to in **Table 9-4**.	Relief Well Rig Capability Register Well specific Source Control Plan
	Regular monitoring of Relief Well Rig Capability Register to ensure preferred MODU remains available throughout the activity	If the preferred MODU becomes unavailable during the activity, Santos will update the SCP to identify a suitably alternative MODU	Relief Well Rig Capability Register Well specific Source Control Plan
	Contract and Equipment Access Agreement with WWC	Contract and Equipment Access Agreement with WWC are maintained providing technical support and equipment	Contract with WWC
	Arrangements for source control emergency response personnel	Arrangements for access to source control personnel are maintained during the activity	Contract/ Memorandums of Understanding for source control personnel
	Pre-Purchase relief well supplies	Long lead equipment for a relief well drilling will be pre purchased as part of the WOMP commitments for each well drilled.	WOMP
Source control -vessel collision	Vessel Spill Response Plan (SOPEP/SMPEP)	Support vessels have a SOPEP or shipboard marine pollution emergency plan (SMPEP) that outlines steps taken to combat spills	Audit records. Inspection records
		Spill exercises on support vessels are conducted as per the vessels SOPEP or SMPEP	Spill exercise close out reports
Response Implementation			
Source control – BOP Activation	BOP installed in accordance with API Standard 53	BOP is activated manually in accordance with MODU	Incident Log

Environmental Performance Outcome	Implementation of source control methods to stop the release of hydrocarbons into the marine/onshore environment.		
Response Strategy	**Control Measures**	**Performance Standards**	**Measurement Criteria**
		Operator's Emergency Response Plan	
Source control - SFRT	Access to suitable SFRT vessel	Vessel mobilised to Dampier within 8 days of IMT call-out	Incident Log
	Access to personnel for the deployment of the SFRT	Oceaneering to mobilise personnel to Dampier within 8 days of IMT call-out	Incident Log
Source control – relief well drilling	Source Control Branch	Source Control Branch mobilised within 24 hours of the well release	Incident Log
	Equipment/Services for Relief Well drilling	Equipment/Services for Relief Well drilling sourced within five days of the well release	Incident Log
	Well Control Specialists	Well control specialists mobilised within 72 hours of the well release	Incident Log
	Relief Well MODU	MODU for relief well drilling to be onsite by Day 33 from the start of a well release.	Incident Log
	Relief Well	Relief well completed within 77 days of well leak incident	Incident Log
	Source Control Planning and Response Guideline (DR-00-OZ-20001)	Relief well drilling implemented in accordance with the Source Control Planning and Response Guideline (DR-00-OZ-20001) during a well release	Incident Log
Source control -vessel collision	As per the vessel SOPEP	Actions to control spill associated with a vessel incident followed in accordance with SOPEP	Vessel logs

10 Monitor and Evaluate Plan

Understanding the behaviour and likely trajectory of an oil spill is critical to evaluate the appropriate response strategy. There are a number of methods that can be used to monitor and evaluate, including:

+ vessel surveillance
+ aerial surveillance
+ tracking buoys
+ oil spill trajectory modelling
+ satellite imagery
+ initial oil characterisation
+ operational water quality monitoring
+ shoreline clean-up assessments.

10.1 Vessel surveillance

Table 10-1 provides the environmental performance outcome, initiation criteria and termination criteria for this strategy.

Table 10-1: Vessel surveillance – environmental performance outcome, initiation criteria and termination criteria

Environmental Performance Outcome	Implement monitor and evaluate tactics in order to provide situational awareness to inform IMT decision -making	
Initiation criteria	Notification of a Level 2/3 spill - may be deployed in a Level-1 incident (to be determined by OSC)	
Applicable hydrocarbons	**Caley Condensate**	**MDO**
	✓	✓
Termination criteria	+ Vessel-based surveillance is undertaken at scheduled intervals during daylight hours and continues for 24 hours after the source is under control and a surface sheen is no longer observable, OR + NEBA is no longer being achieved, OR + Agreement is reached with Jurisdictional Authorities to terminate the response	

Direct observations from field support or other vessels can be used to assess the location and visible extent of the hydrocarbon incidents, and to verify modelling predictions and trajectories. Due to the proximity of observers to the water's surface, vessel surveillance is limited in its coverage in comparison to aerial surveillance and may also be compromised in rough sea state conditions or where fresh hydrocarbons at surface poses safety risks.

10.1.1 Implementation guidance

Table 10-2 provides guidance to the IMT on the actions and responsibilities that should be considered when selecting this strategy. **Table 10-3** provides a list of resources that may be used to implement this strategy.

Mobilisation times for the minimum resources that are required to commence initial vessel surveillance operations are listed in **Table 10-4**. The OSC and/or Incident Commander is ultimately responsible for implementing the response, and may therefore determine that some tasks be varied, should not be implemented or be reassigned.

Table 10-9 lists the Environmental Performance Standards and Measurement Criteria for this strategy.

Table 10-2: Implementation guidance – vessel surveillance

	Action	Consideration	Responsibility	Complete
Initial Actions	Notify nearest available Support Vessel to commence surveillance.	Current Santos on hire vessels or Vessels of Opportunity (VOO) can be used. Automatic Identification System (AIS) vessel tracking is available through ER intranet page.	On-Scene Commander Operations Section Chief	❑
	Source additional contracted vessels if required for assistance.		Logistics Section Chief	❑
	Record surface slick location and extent, weather conditions, and marine fauna. Complete vessel surveillance forms, located in **Appendix E** and provide to On-Scene Commander (Level 1 spills) or IMT (Level 2-3 spills).	Photographic images are to be taken where possible and included with surveillance forms. Trained observers will not be available immediately – photos and locations will provide initial information that can be interpreted by IMT.	Vessel Observers	❑
	Relay surveillance information (spill location, weather conditions, marine fauna sightings and visual appearance of the slick to the IMT within 60 minutes of completing vessel surveillance.	Initial reports to the IMT may be verbal (followed by written transmission) if the vessel is out of range or has no facilities for transmitting forms.	Vessel Master and/or On-Scene Commander	❑
Ongoing Actions	Review surveillance information to validate spill fate and trajectory.		Planning Section Chief/ GIS	❑
	Use available data to conduct operational NEBA and confirm that pre-identified response options are appropriate.		Environment Unit Leader	❑
	Use monitor and evaluate data to periodically reassess the spill and modify the response (through the IAP), as required	Surveillance data is useful in updating the Common Operating Picture	Planning Section Chief	❑

Table 10-3: Vessel surveillance resource capability

Equipment Type/ Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
Contracted vessels and vessels of opportunity	Santos Contracted Vessel Providers Vessels of opportunity identified through AIS Vessel Tracking.	Availability dependent upon Santos and Vessel Contractor activities. Santos on-hire vessels include Ningaloo Vision Supply Vessel and Varanus Island Field Support Vessel.	Vessels mobilised from Exmouth, Dampier, Varanus Island or offshore location. Locations verified through AIS Vessel Tracking Software.	Pending availability and location. Expected within 12 hours.

Table 10-4: Vessel surveillance – first strike response timeline

Task		Time from IMT call-out
IMT begins sourcing Santos contracted vessel or VOO for on-water surveillance		<90 minutes
VOO onsite for surveillance		<12 hours (daylight dependent)
Minimum Resource Requirements		
One vessel. No specific vessel or crew requirements.		
Approximate Steam Time		
Deployment Location	Approximate Distance to Operational Area[13] (nautical miles)	Approximate steam time[14] (hours)
Bedout Island	27	3
Port Hedland	76	8
Broome	198	20
Dampier/Karratha	165	17
Varanus Island	213	22

10.2 Aerial surveillance

Table 10-5 provides the environmental performance outcome, initiation criteria and termination criteria for this strategy.

Table 10-5: Aerial surveillance – environmental performance outcome, initiation criteria and termination criteria

Environmental Performance Outcome	Implement monitor and evaluate tactics in order to provide situational awareness to inform IMT decision -making	
Initiation criteria	Notification of a Level 2/3 spill	
Applicable hydrocarbons	**Caley Condensate**	**MDO**
	✓	✓
Termination criteria	+ Aerial surveillance undertaken at scheduled intervals during daylight hours and continues for 24 hours after the source is under control and a surface sheen is no longer observable, OR + As directed by the relevant Control Agency	

[13] As measured to geometric centre point of operational area

[14] At average rate of 10 nautical miles per hour

Aerial surveillance is used to record the presence and size of the hydrocarbon spill at surface as well as other environmental observations including weather conditions, marine fauna and sensitive receptors in the area. Aerial surveillance provides superior coverage over vessel surveillance for estimating the spatial extent of a spill but is generally required only for larger Level 2/3 spills.

10.2.1 Implementation guidance

Table 10-6 provides guidance to the IMT on the actions and responsibilities that should be considered when selecting this strategy. **Table 10-7** provides a list of resources that may be used to implement this strategy. Mobilisation times for the minimum resources that are required to commence initial aerial surveillance operations are listed in **Table 10-8**. The On-Scene Commander and/or Incident Commander is ultimately responsible for implementing the response, and may therefore determine that some tasks be varied, should not be implemented or be reassigned.

Table 10-42 lists the Environmental Performance Standards and Measurement Criteria for this strategy.

Table 10-6: Implementation guidance – aerial surveillance

	Action	Consideration	Responsibility	Complete
Initial Actions	Contact contracted aviation provider- provide details of incident and request mobilisation to spill site for initial surveillance.	If aviation asset is available near spill location, utilise where possible to gather as much information about the spill. If aviation asset not available at spill location IMT is to seek available resources through existing contractual arrangements. It is possible that the initial surveillance flight will not include a trained aerial surveillance observer. Initial flights can be conducted using a standard crew and initial surveillance should not be delayed waiting for trained personnel. Ensure all safety requirements are met prior to deployment. There should be an attempt to obtain the following data during initial surveillance: + name of observer, date, time, aircraft type, speed and altitude of aircraft + location of slick or plume (global positioning system [GPS] positions, if possible) + spill source + size of the spill, including approximate length and width of the slick or plume + visual appearance of the slick (e.g. colour) + edge description (clear or blurred) + general description (windrows, patches etc.) + wildlife, habitat or other sensitive receptors observed	Operations Section Chief Logistics Section Chief	❑

Action		Consideration	Responsibility	Complete
		+ basic metocean conditions (e.g. sea state, wind, current) + photographic/video images.		
	Source available Santos Aerial Observers, arrange accommodation/logistics and deploy to Forward Operations/Air base location.	Santos Aerial Observer list available from First Strike Resources on Santos Offshore ER Intranet page.	Operations Section Chief Logistics Section Chief	❑
	Develop flight plan (frequency and flight path) to meet IMT expectations and considering other aviation ops. Expected that two overpasses per day of the spill area are completed.	Flight plan to confirm with OSC that aircraft are permitted in the vicinity of the spill. Flights are only to occur during daylight and in weather conditions that do not pose significant safety risks.	Operations Section Chief / Aviation Superintendent	❑
	Pre-flight briefing.		Aerial Observers Contracted aircraft provider/ pilots	❑
	Aerial Observers to commence surveillance	Consider procedure for interacting with marine fauna.	Operations Section Chief	❑
	Determine the spill extent by completing Aerial Surveillance Log (**Appendix F**) and Aerial Surveillance Surface Slick Monitoring Template. Calculate volume of oil. Take still and/or video images of the slick.	Thickness estimates are to be based on the Bonn Agreement Code (Santos Procedure Index).	Aerial Observer	❑
	Record presence and type of fauna by completing the Aerial Surveillance Marine Fauna Sighting Record Sheet (Appendix H).		Aerial Observer	❑
	Record shoreline habitat type and degree of oiling by completing the Shoreline Aerial Reconnaissance Log (**Appendix I**).	Thickness estimates are to be based on the Bonn Agreement Code (Santos Procedure Index).	Aerial Observer	❑

Action		Consideration	Responsibility	Complete
	Relay all surveillance records: logs, forms, photographic images, video footage to the IMT	Where possible, a verbal report via radio/telephone en route providing relevant information should be considered if the aircraft has long transits from the spill location to base	Aerial Observer Planning Section Chief Operations Section Chief	❑
Ongoing Actions	Update flight schedule for ongoing aerial surveillance as part of broader Aviation Subplan of IAP	Frequency of flights should consider information needs of IMT to help maintain the Common Operating Picture and determine ongoing response operations	Operations Section Chief/ Aviation Superintendent Planning Section Chief	❑
	Mobilise additional aircraft and trained observers to the spill location to undertake ongoing surveillance activities		Logistics Section Chief	❑
	Update common operating picture with surveillance information and provide updates to spill trajectory modelling provider		Planning Section Chief GIS Team Leader	❑

Table 10-7: Aerial surveillance resource capability

Equipment Type/Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
Rotary Wing Aircraft & flight Crew	Santos contracted provider/s (primary provider currently Babcock)	Two contracted (one primary + one back-up) + additional as required	Karratha (primary base) Learmonth Onslow	Wheels up within 1 hour for Emergency Response. Spill surveillance <6 hours (daylight dependent)
Aerial Surveillance Crew	Santos aerial observers AMOSC Industry Mutual aid	Seven Santos staff Nine AMOSC staff Five AMOSC Core Group 54 additional trained industry personnel	Perth & Varanus Island (VI) (Santos aerial observers) Australia wide	Santos trained personnel - next day mobilisation to airbase <24 hours
Drones and pilots ** secondary response to assist shoreline and vessel-based surveillance	AMOSC OSRL – -third party unmanned aerial vehicle (UAV) provider Local WA hire companies	Two Two qualified remote pilots, however response is on best endeavour 10+	Geelong Perth Perth and regional WA	<48 hours OSRL – depending on the port of departure, one to two days if within Australia

Table 10-8: Aerial surveillance – first strike response timeline

Task	Time from IMT call-out	
Santos helicopter activated for aerial surveillance	<3 hours	
Helicopter onsite for aerial surveillance	<6 hours (daylight dependent)	
Trained Aerial Observers mobilised to airbase	<24 hours	
Minimum Resource Requirements		
+ Santos contracted helicopter and pilots + Santos trained Aerial Observers		
Approximate Flight Time		
Nearest Airport	**Approximate Distance[15] (NM)**	**Approximate flight time[16] (hours: minutes)**
Port Hedland	120	1:00
Karratha	220	1:50
Learmonth	390	3:15

10.3 Tracking buoys

Table 10-9 provides the environmental performance outcome, initiation criteria and termination criteria for this strategy.

Table 10-9: Tracking buoys – environmental performance outcome, initiation criteria and termination criteria

Environmental Performance Outcome	Implement monitor and evaluate tactics in order to provide situational awareness to inform IMT decision -making	
Initiation criteria	Notification of a Level 2 or 3 spill May be deployed for a Level 1 spill if deemed beneficial by the OSC	
Applicable hydrocarbons	**Caley Condensate**	**MDO**
	✓	✓
Termination criteria	+ Tracking buoy deployment will continue for 24 hours after the source is under control and a surface sheen is no longer observable, OR + As directed by the relevant Control Agency	

10.3.1 Implementation guidance

Table 10-10 provides guidance to the IMT on the actions and responsibilities that should be considered when selecting this strategy. **Table 10-11** provides a list of resources that may be used to implement this strategy.

[15] As measured to geometric centre point of operational area

[16] At average flight speed of 120 knots

The OSC and/or Incident Commander is ultimately responsible for implementing the response, and may therefore determine that some tasks be varied, should not be implemented or be reassigned.

Table 10-42 lists the Environmental Performance Standards and Measurement Criteria for this strategy.

Santos

Table 10-10: Implementation guidance – tracking buoys

Action		Consideration	Responsibility	Complete
Initial Actions	Organise vessel to mobilise two tracking buoys from MODU.	Personnel and vessel safety is priority. Current Santos on hire vessels or VOOs can be used. AIS vessel tracking is available through ER intranet page.	OSC/Operations Section Chief	❑
	Deploy two tracking buoys at leading edge of slick.	Note deployment details and weather conditions in incident log.	Vessel Master	❑
	Inform IMT that tracking buoys have been deployed and provide deployment details. Monitor movement of tracking buoys.	Refer login details of tracking buoy monitoring website on Santos ER intranet site.	OSC Planning Section Chief/GIS	❑
	Use tracking buoy data to maintain Common Operating Picture.	Data tracked online.	Planning Section Chief/ GIS	❑
	Relay information to spill fate modelling supplier for calibration of trajectory modelling.		Planning Section Chief/ GIS	❑
Ongoing Actions	Assess the need for additional tracking buoys in the spill scenario and identify/nominate preferred deployment locations.	Incident Action Plan to provide guidance regarding any additional deployments of tracking buoys.	Planning Section Chief	❑
	Mobilise additional tracking buoys if required from other Santos operations (Santos presently has 12 Tracker Buoys located on the North West Shelf) or from AMOSC stockpiles.		Logistics Section Chief	❑
	Direct the deployment of the Tracker Buoys – for continuous releases over multiple days use a rolling deployment/collection of buoys to provide better coverage of plume direction.		Operations Section Chief	❑

Action		Consideration	Responsibility	Complete
	Deploy tracking buoys.		Vessel Master	❑
	Monitor movement of tracking buoys.		Planning Section Chief/GIS	❑
	Relay information to spill trajectory modelling supplier for calibration of trajectory modelling.		Planning Section Chief/GIS	❑

Table 10-11: Tracking buoys resource capability

Equipment Type/Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
Tracking buoys x 12	Santos	2 2 4 4	MODU Exmouth Varanus Island Dampier	MODU buoys – <2 hours for incident Exmouth buoys (when Ningaloo Vision in shipyard) – <12 hours pending vessel availability VI/Dampier buoys – 24 to 48 hours pending vessel availability Additional buoys available from Dampier if required
AMOSC tracking buoys	AMOSC	12 AMOSC	Broome x 2 Fremantle x 6 Geelong x 4	Response via duty officer within 15 minutes of first call- AMOSC personnel available within 1 hour of initial activation call. Equipment logistics varies according to stockpile location (refer to **Table 10-12**)

Santos

Table 10-12: Australian Marine Oil Spill Centre equipment mobilisation timeframes

	Perth	Darwin	Exmouth	Dampier	Broome
Geelong	40 hrs 3395 km	44 hr 3730 km	64 hrs 4520 km	70 hrs 4840 km	68 hrs 4970 km
Perth	NA	48 hrs 4040 km	15 hrs 1250 km	19 hrs 1530 km	27 hrs 2240 km
Exmouth	15 hrs 1250 km	38 hrs 3170 km	NA	7 hrs 555 km	16 hrs 1370 km
Broome	27 hrs 2240 km	22 hrs 1870 km	16 hrs 1370 km	11 hrs 855 km	NA

Table 10-13: Tracking buoy – first strike response timeline

Task	Time from IMT call-out
Tracking buoys deployed from drilling rig	<2 hours
OR	
Tracking buoys deployed from Dampier using vessels of opportunity	<12 hours
Minimum Resource Requirements	
+ Two tracking buoys for initial deployment	

10.4 Oil spill trajectory modelling

Table 10-14 provides the environmental performance outcome, initiation criteria and termination criteria for this strategy.

Table 10-14: Oil spill trajectory modelling – environmental performance outcome, initiation criteria and termination criteria

Environmental Performance Outcome	Implement monitor and evaluate tactics in order to provide situational awareness to inform IMT decision -making	
Initiation criteria	Notification of a Level 2 or 3 spill	
Applicable hydrocarbons	**Caley Condensate**	**MDO**
	✓	✓
Termination criteria	+ Spill fate modelling will continue for 24 hours after the source is under control and a surface sheen is no longer observable, or until no longer beneficial to predict spill trajectory and concentrations, OR + As directed by the relevant Control Agency	

Oil spill trajectory modelling uses computer modelling (e.g. OILMAP, SIMAP) to estimate the movement, fate and weathering potential of spills. Santos has engaged RPS Group to provide forecast spill fate modelling. RPS Group use SIMAP and OILMAP modelling systems that comply with Australian Standards (ASTM Standard F2067 “Standard Practice for Development and Use of Oil Spill Models”). RPS Group also provide the capacity for forecast air quality monitoring to enable an assessment of potential health and safety risks associated with VOCs released from a surface slick.

A particular advantage of spill trajectory modelling is that the transport and weathering of spilled hydrocarbons can be forecast, at all times of the day and night, at any location, and under any type of metocean conditions. By contrast, aerial surveillance and vessel-based monitoring will be constrained to daytime use, and have limits imposed by the operating environment. Aerial surveillance and vessel-based monitoring are, however, essential for model validation, verification and calibration of any modelling or first principal predictions.’

10.4.1 Implementation guidance

Table 10-15 provides guidance to the IMT on the actions and responsibilities that should be considered when selecting this strategy.

Table 10-16 provides a list of resources that may be used to implement this strategy. The OSC and/or Incident Commander is ultimately responsible for implementing the response, and may therefore determine that some tasks be varied, should not be implemented or be reassigned.

Table 10-42 lists the Environmental Performance Standards and Measurement Criteria for this strategy.

Santos

Table 10-15: Implementation guidance – oil spill trajectory modelling

Action		Consideration	Responsibility	Complete
Initial Actions	Initiate oil spill trajectory modelling (OSTM) by submission of an oil spill trajectory modelling request form (Santos Procedure Index). Request for three-day forecast trajectory modelling.		Environment Unit Leader	❑
	Determine requirement for gas/VOC modelling and request initiation.	hydrocarbon releases have human health and safety considerations for responders (volatile gases and organic compounds). This to be considered for any tactics that monitor/recover oil – especially at close proximity to release site.	Safety Officer Environment Unit Leader	❑
	Operational surveillance data (aerial, vessel, tracker buoys) to be provided to modelling provider to verify and adjust fate predictions of the spill and improve predictive accuracy.		Planning Section Chief/GIS	❑
	Login to the RPS Group data sharing website and maintain connection. Download modelling results.	Data should be stored digitally and backed up on to independent digital storage media. All datasets should be accompanied by a metadata summary and documented quality assurance and control procedures.	Planning Section Chief/GIS	❑
	Place RPS Group modelling data into GIS/Common Operating Picture.	RPS Group is to provide at least daily updates to the IMT of trajectory model outputs to inform response planning. More frequent updates can be provided if weather conditions are highly variable or change suddenly.	Planning Section Chief/GIS	❑

Action		Consideration	Responsibility	Complete
	In the event that chemical dispersants are considered applicable strategy for spill scenario, request modelling provider to model how dispersant addition effects the distribution and concentration of floating oil, subsea oil and shoreline loading.	Planning and Operations to provide inputs for modelled simulation based on potential/planned dispersant operations. Outputs from dispersant addition modelling to inform NEBA.	Planning Section Chief Operations Section Chief	❑
	Identify location and sensitivities at risk based on the trajectory modelling and inform IMT. Conduct NEBA on proposed response strategies.		Environment Unit Leader	❑
Ongoing Actions	Request spill trajectory modelling be provided daily throughout the duration of the response and integrate data into Common Operating Picture.		Planning Section Chief/ GIS	❑
	Use results from other monitor and evaluate activities, and/or data derived from hydrocarbon assays of the source hydrocarbon or from other reservoirs in the region (that may be available) as input data (if or when available) to improve model accuracy.		Planning Section Chief/ GIS	❑

Table 10-16: Oil spill trajectory modelling resource capability

Equipment Type/Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
RPS OST modellers and software	RPS under direct contract to Santos, also available through AMOSC	Daily OSTM reports	Perth – digital	Two to four hours from activation

Table 10-17: Oil spill trajectory modelling – first strike response timeline

Task	Time from IMT call-out
RPS OSTM activated by IMT	<2 hours
OSTM provided to IMT	<4 hours
Minimum Resource Requirements	
+ Contracted OST modellers and software + OSTM Activation Form	

10.5 Satellite imagery

Table 10-18 provides the environmental performance outcome, initiation criteria and termination criteria for this strategy.

Table 10-18: Satellite imagery – environmental performance outcome, initiation criteria and termination criteria

Environmental Performance Outcome	Implement monitor and evaluate tactics in order to provide situational awareness to inform IMT decision -making	
Initiation criteria	Notification of a Level 2 or 3 spill	
Applicable hydrocarbons	**Caley Condensate**	**MDO**
	✓	✓
Termination criteria	+ Satellite monitoring will continue until no further benefit is achieved from continuing; or as advised by relevant Control Agency.	

Satellite imagery is considered a supplementary source of information that can improve awareness but is not critical to the response and usage is at the discretion of the IMT.

Suitable imagery may be available via satellite imagery suppliers. This can be done through existing AMOSC and OSRL contracts. The most appropriate images for purchase will be based on the extent and location of the oil spill. Synthetic aperture radar and visible imagery may both be of value.

10.5.1 Implementation guidance

Table 10-19 provides guidance to the IMT on the actions and responsibilities that should be considered when selecting this strategy. **Table 10-20** provides a list of resources that may be used to implement this strategy. The Incident Commander is ultimately responsible for implementing the response, and may therefore determine that some tasks be varied, should not be implemented or be reassigned.

Table 10-42 lists the Environmental Performance Standards and Measurement Criteria for this strategy.

Table 10-19: Satellite imagery implementation guide

Action		Consideration	Responsibility	Complete
Initial Actions	Assess requirement for satellite imagery.		Planning Section Chief	❑
	Notify AMOSC and OSRL Duty Officer to initiate request for available satellite imagery.	Formal written activation of resources from AMOSC and OSRL by designated call-out authorities (Santos Duty Managers/Incident Commanders) is required.	Planning Section Chief	❑
	Assess suitability and order imagery.		Planning Section Chief	❑
	Integrate satellite imagery into common operating picture and provide to trajectory modelling provider for model validation.		GIS Team Leader Planning Section Chief	❑
Ongoing Actions	Review surveillance information to validate spill fate and trajectory.		Planning Section Chief	❑
	Use monitor and evaluate data to periodically reassess the spill and modify the response (through the IAP), as required.	Use surveillance data when updating the Common Operating Picture.	Planning Section Chief	❑

Table 10-20: Satellite imagery resource capability

Equipment Type/ Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
Satellite Imagery	KSAT – activated through AMOSC MDA – activated through OSRL	Dependent upon overpass frequency (TBC on activation)	Digital	AMOSC: one hour if satellite images available OSRL: Within 4 hours of satellite image acquisition (i.e. latest overpass with no cloud)

10.6 Initial oil characterisation

Table 10-21 provides the environmental performance outcome, initiation criteria and termination criteria for this strategy.

Table 10-21: Initial oil characterisation - environmental performance outcome, initiation criteria and termination criteria

Environmental Performance Outcome	Implement monitor and evaluate tactics in order to provide situational awareness to inform IMT decision -making	
Initiation criteria	Notification of a Level 2 or 3 spill	
Applicable hydrocarbons	**Caley Condensate**	**MDO**
	✓	✓
Termination criteria	+ Oil sample and analysis to terminate once enough data has been collected to profile the oil characteristics and dispersant amenability throughout weathering and to provide oil for toxicity testing, OR + As directed by the relevant Control Agency	

10.6.1 Overview

Given MDO is a common fuel type with known properties and Caley Condensate is a hydrocarbon that has been previously assayed, the general physical and chemical characteristics of these hydrocarbons are known and have been presented in **Appendix A**. Nevertheless, sampling and analysis of the released hydrocarbon will provide the most accurate information on the hydrocarbon properties at the time of release.

The composition and physical properties of the hydrocarbon will also evolve over time through weathering processes that change its composition and properties, such as the viscosity, density, water content and pour point. The rate of change of the hydrocarbon properties will affect the likely time-window of opportunities for particular responses and the associated logistical requirements of these responses, such as use of chemical dispersants, recovery and pumping equipment suitability, hydrocarbon storage and hydrocarbon disposal requirements.

10.6.2 Implementation guidance

Table 10-22 provides guidance to the IMT on the actions and responsibilities for this strategy. **Table 10-23** provides a list of resources that may be used to implement this tactic. The OSC and/or Incident Commander is ultimately responsible for implementing the response, and may therefore determine that some tasks be varied, should not be implemented or be reassigned.

Table 10-42 lists the Environmental Performance Standards and Measurement Criteria for this strategy.

10.6.3 Oil sampling and analysis

Onsite dispersant testing

Using AMOSC dispersant shake test kits, samples of oil are to be tested by onsite vessels/crew for dispersant efficacy using the included dispersants by way of a simple shake test of efficacy. Photos of sample jars and observations are to be reported back to the IMT for evaluation. These tests are not a substitute for laboratory testing and test spraying but provide an early indication of efficacy on the oil and the relative effectiveness of the dispersants included within the test kits.

Laboratory analysis

Using onsite VOOs, oil samples (2 L per sample) are to be taken daily where possible from fresh oil, and from the weathered oil locations, nominally representing 24 hours old, 48 hours old and 72 hours old (as they occur) and dispatched to a laboratory for analysis.

Laboratory analysis of the chemical and physical properties of the recovered oil, including gas chromatography/mass spectrometry for the purpose of fingerprinting the oil constituents, is to be undertaken. Fingerprinting of the released hydrocarbon potentially allows contamination to be traced back to the source where this is otherwise unclear or in dispute.

Ecotoxicology assessment of the oil is to be conducted at an ecotoxicology laboratory following the revised Australian and New Zealand Water Quality Guidelines. The quantity of oil required for analysis will be confirmed by the laboratory but is expected to be in the order of 6 to 10 L of oil. Testing results will provide the concentrations at which toxicity endpoints consistent with revised Australian and New Zealand Water Quality Guidelines are met for each test. Overall species protection concentrations, including 90%, 95% and 99% species protection trigger levels are then to be generated using a species sensitivity distribution fitted to the data (e.g. by using the Burrlioz software program).

Table 10-22: Implementation guidance – initial oil characterisation

Action		Consideration	Responsibility	Complete
Initial Actions	Source available vessels (on hire or VOO) for oil sampling.	Can be multi-tasked – e.g. for vessel surveillance or tracking buoy deployment.	Operations Section Chief Logistics Section Chief	❑
	Source sampling equipment. Confirm sampling methodology. Confirm laboratory for sample analysis. Develop health and safety requirements/controls.	Refer **Table 10-23** for resource availability. Appendix A and D of CSIRO oil spill monitoring handbook provide suitable procedure.	Environment Unit Leader Safety Officer	❑
	Vessel directed to sampling location.	Sampling of oil at thickest part of slick – typically leading edge.	Operations Section Chief	❑
	Vessel crew to undertake sampling and delivery of samples to Exmouth or Dampier for dispatch to laboratory. Environment Unit Leader to confirm analysis of oil with lab.	Exmouth and/or Dampier Logistics personnel to assist with logistics of sending oil samples to laboratory for analysis.	Operations Section Chief Environment Unit Leader Logistics Section Chief	❑
Ongoing Actions	Continue sample collection for 14 days post release where oil is available.	Initial monitoring by crew of available vessels – Once mobilised to site Santos scientific monitoring provider to continue sampling of oil in conjunction with operational water quality monitoring once mobilised to site.	Operations Section Chief Environment Unit Leader Logistics Section Chief	❑

Table 10-23: Initial oil characterisation – resource capability

Equipment Type/Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
Dispersant efficacy kits (shake test)	AMOSC/Santos	3	Exmouth, Varanus Island, Dampier	Within 12 hours
Oil sampling kits	AMOSC/Santos	3	Exmouth, Varanus Island, Dampier	Within 12 hours
Bulk oil sampling bottles	Intertek/Santos	As required	Perth Exmouth, Varanus Island, Dampier	Within 12 hours
Santos contracted vessel providers Vessels of Opportunity identified through AIS vessel tracking system	Availability dependent upon Santos and Vessel Contractor activities.	Vessels mobilised from Exmouth, Dampier, Varanus Island or offshore location. Locations verified through AIS vessel tracking system	Pending availability and location. Expected within 12 hours	Santos -contracted vessel providers Vessels of Opportunity identified through AIS Vessel Tracking
National Association of Testing Authorities accredited laboratory/ personnel for analysis	Intertek	NA	Perth	24+ hours

Santos

Table 10-24: Initial oil characterisation – first strike response timeline

Task	Time from IMT call-out
Oil sample collection	<12 hours (daylight dependent)
Oil samples arrive at lab for analysis	<36 hours
Minimum Resource Requirements	
+ One vessel; no special requirements; oil sampling can be done concurrently with other tasks + One dispersant efficacy shake test kit + One oil sampling kit + Sampling jars for bulk oil collection	

10.7 Operational water quality monitoring

10.7.1 Operational water sampling and analysis

Table 10-25 provides the environmental performance outcome, initiation criteria and termination criteria for this strategy.

Table 10-25: Operational water quality sampling and analysis – environmental performance outcome, initiation criteria and termination criteria

Environmental Performance Outcome	Implement monitor and evaluate tactics in order to provide situational awareness to inform IMT decision -making	
Initiation criteria	Notification of a Level 2 or 3 spill	
Applicable hydrocarbons	**Caley Condensate**	**MDO**
	✓	✓
Termination criteria	+ Operational water sampling and analysis will continue for 24 hours following control of the source provided oil is no longer detectable, OR + As directed by the relevant Control Agency, OR + Vessel surveillance will terminate if there are unacceptable safety risks associated with volatile hydrocarbons at the sea surface.	

Operational sampling of oil and oil in water will be undertaken at discrete locations, providing visual observations, real time fluorometry/ dissolved oxygen readings and providing oil and water samples for laboratory analysis. The intent of this sampling is to confirm the distribution and concentration of oil, validating spill trajectory modelling and providing and informing the selection and implementation of other response strategies, including scientific monitoring.

Table 10-26 presents the water quality sampling and analysis plan considerations.

This monitoring is complimentary to scientific water quality monitoring (SMP1) delivered through the Oil Spill SMP in terms of methodology and required skillset and can be provided through Santos' Scientific Monitoring Provider (**Section 18**).

10.7.1.1 Implementation guidance

Refer to **Table 10-26** for the Operational Water Quality Sampling and Analysis implementation guide. The Incident Commander is ultimately responsible for implementing the response, and may therefore determine that some tasks be varied, should not be implemented or be reassigned.

Table 10-42 lists the Environmental Performance Standards and Measurement Criteria for this strategy.

Table 10-26: Operational Water Quality Sampling and Analysis Plan considerations

Considerations for Operational Water Quality Sampling and Analysis	
Scope of work	The work scope for operational water quality monitoring will be driven by the IMT, confirming objectives for each operational period.
Survey design	The operational water sampling activities will be conducted by experienced environmental scientists and managed through the IMT Incident Action Planning process. The exact nature of the sampling activities will depend upon the objectives for each operational period; however, the sampling design and methodology will consider the following points: + Sampling locations will be moved with the slick and/or plume based on the observed or predicted location and movement of oil on water and subsea plumes. This will be informed by vessel/aerial surveillance, satellite tracking buoys and spill fate modelling. + At each discrete location, sampling will be conducted using a conductivity-temperature-depth (CTD) meter along a depth profile which captures the three-dimensional distribution of the oil. The CTD would require fluorometry and dissolved oxygen sensors as part of the sensor package to record the presence of oil (fluorometry) and the activity of hydrocarbon degrading bacteria (dissolved oxygen). Fluorometers appropriate to the hydrocarbon type will need to be selected. + The CTD would help inform the depth at which water samples would be taken; and in the case of incidents where dispersants are approved for use, may inform the water sampling locations for Special Monitoring of Applied Response Technologies (SMART) Protocol and subsea dispersant efficacy monitoring (using API (2020) Technical Report 1152) methods. + For a subsea release or where surface oil is present in shallow water (<5 m) this should involve a depth profile from the seabed to surface waters. Profiles should ensure that the full gradient of oil in water concentration can be determined. + Oil and oil in water samples are to be collected using suitable pumping or sampling apparatus. For samples at depth a Niskin bottle(s) or similar device that allows remote closing and discrete sampling at depth is to be used. Alternatively, water samples can be pumped from defined depths using a hose suspended vertically using a suitable pump for water sampling (e.g. a peristaltic pump).

Considerations for Operational Water Quality Sampling and Analysis	
	+ Samples are to be collected in clean, fully labelled glass jars, filled to the top and refrigerated/ kept cool and in darkness during storage and transport. Handling, storage and documentation requirements to be confirmed with laboratory but holding time <7 days is expected requirement. + Oil and oil in water samples will be replicated at each site to allow intra-site variability to be assessed and appropriate quality assurance and control samples incorporated into replicates. + Santos will coordinate transportation of samples from the sampling location to the laboratory. Samples will be accompanied with a completed Chain of Custody form. + Water samples also to be provided to an independent National Association of Testing Authorities (NATA)-accredited laboratory in Perth for hydrocarbon suite analysis including polycyclic aromatic hydrocarbons.
Analysis and reporting	+ All data collected on oil properties provided in spreadsheets (including GPS location, depth of sampling, timing, on water observations, in-situ readings and water sample label details) to IMT on an ongoing basis during spill response operations. + Daily field reports of results provided to the IMT. + Analytical analysis of oil properties following laboratory evaluation. + Final report detailing all data collected on oil properties throughout the monitoring program including relevant interpretation.

Table 10-27: Implementation guidance – operational water quality sampling and analysis

Action		Consideration	Responsibility	Complete
Initial Actions	Activate Santos Monitoring Service Provider for Operational Water Quality Monitoring.		Environment Unit Leader	❑
	Obtain spill trajectory modelling and provide to Monitoring Service Provider.		Environment Unit Leader Planning Section Chief GIS Support	❑
	Develop Monitoring Action Plan (Including Sampling and Analysis Plan) for operational water quality monitoring. Plan to also consider oil characterisation sampling (**Section 10.5**)– Monitoring Service Provider to take over this sampling once mobilised.	Sites to be selected using oil spill trajectory modelling and distribution of oil from surveillance tactics. Refer **Table 10-26** for considerations for Sampling and Analysis Plan.	Monitoring Service Provider Environment Unit Leader	❑
	Develop health and safety plan including potential exposure to volatile gases/VOCs.	Refer Oil Spill Response Health and Safety Management Manual (SO-91-RF-10016).	Monitoring Service Provider Safety Officer	❑
	Monitoring Service Provider to assemble team/s and water quality monitoring equipment.		Monitoring Service Provider	❑
	Organise Vessels, accommodation and transport requirements to mobilise monitoring team/s to site.	Monitoring Service provider to outline requirements in resource request form.	Logistics Section Chief	❑
	Sampling and analysis undertaken. Daily communication and confirmation of sampling plan with OSC and IMT. Daily activity/data reports provided to IMT. Oil/water samples dispatched to nominated laboratories for analysis.		Monitoring Service Provider On-Scene Commander Operations Section Chief Environment Unit Leader Logistics Section Chief	❑

Action		Consideration	Responsibility	Complete
Ongoing Actions	Monitoring results to be conveyed to IMT through Common Operating Picture and provided to spill trajectory modeller to validate predictions.		Planning Section Chief GIS Support Environment Unit Leader	❑

Table 10-28: Operational water quality sampling and analysis – resource capability

Equipment Type/Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
Water quality monitoring personnel	Monitoring Service Provider (currently Astron/BMT)	Approx. 6 (based on capability reports)	Perth based	Personnel and equipment within 72 hours from approval of work scope – pending vessel availability
Water quality sampling equipment and water quality meters	Third -party suppliers via Monitoring Service Provider (currently Astron/BMT)	Multiple providers	Australia based	
Contracted water quality monitoring vessels	Santos Contracted Vessel Providers	Availability dependent upon Santos and Vessel Contractor activities; suitable vessels identified through AIS Vessel Tracking	Vessels mobilised from Exmouth, Dampier, Varanus Island or offshore location. Locations verified through AIS Vessel Tracking Software	<72 hours

Table 10-29: Operational water quality sampling and analysis – first strike response timeline

Task	Time from IMT call-out
IMT activates monitoring service provider.	<4 hours
Operational water quality monitoring personnel, equipment and vessel deployed to spill site.	<72 hours
Minimum Resource Requirements	
+ Water quality monitoring vessel/s – refer Santos Offshore ER Intranet for vessel specification. + Water quality monitoring team (through monitoring service provider). + Water quality monitoring equipment (through monitoring service provider).	

10.7.2 Continuous fluorometry surveys

Table 10-30 provides the Environmental Performance Outcome, initiation criteria, termination criteria and other key aspects for this strategy

Table 10-30: Continuous fluorometry surveys – environmental performance outcome, initiation criteria and termination criteria

Environmental Performance Outcome	Implement monitor and evaluate tactics in order to provide situational awareness to inform IMT decision -making	
Initiation criteria	Level 2/3 spill	
Applicable hydrocarbons	**Caley Condensate**	**MDO**
	✓	✓
Termination criteria	+ Continuous fluorometry surveys will continue for 24 hours following control of the source provided oil is no longer detectable, OR + As directed by the relevant Control Agency.	

In addition to operational water sampling and sensor deployment at discrete locations, a continuous fluorometry survey(s) may be run across the expected slick/plume extent, as well as vertically through the water column. This allows a far greater area of coverage than discrete sampling, aiding in the mapping of entrained and dissolved oil movement.

Continuous fluorometry surveys are also used to evaluate the effectiveness of dispersant application by detecting changes in the distribution of oil before and after the application of dispersants whether that be on surface on subsea.

Sub surface gliders containing fluorometers built into the body of the glider may be used for this monitoring and would be preferential for monitoring a continuous subsea release (subsea LOWC from all locations). This will allow continuous monitoring of entrained oil covering a large area and will provide near real-time three -dimensional data on the distribution of entrained oil to enable decision making within the IMT. Similarly, other sources of monitoring data (e.g. spill fate modelling) can be used in near real-time to inform the path of the sub surface glider. Sub surface gliders are particularly suited to subsea releases where oil may be distributed below surface layers.

Fluorometers towed behind vessels will be used as an alternative or complementary approach for a subsea release and would be preferred for surface spills and to monitor the effect of dispersant application at surface.

10.7.3 Implementation guidance

Table 10-31 provides guidance to the IMT on the actions and responsibilities that should be considered when selecting this strategy. **Table 10-32** provides a summary of resources that may be used to implement this strategy. **Table 10-33** details the minimum first strike requirements to be mobilised on activation. The Incident Commander is ultimately responsible for the response, and may therefore determine that some tasks be varied, should not be implemented or be reassigned.

Section 10.9 lists the Environmental Performance Standards and Measurement Criteria for this strategy.

Table 10-31: Continuous fluorometry surveys – implementation guidance

Action		Consideration	Responsibility	Complete
Initial Actions	Activate Monitoring Service Provider and engage to provide towed fluorometry services (personnel and equipment) as part of Operational Water Sampling and Analysis – refer **Table 10-27** for actions.		Monitoring Service Provider Environment Unit Leader	❑
	Activate OSRL monitoring and determine availability of subsea gliders and towed fluorometry equipment.	OSRL can provide specialist technical advice on operation of towed fluorometers. Consider: Engaging OSRL for review and input into monitoring action plan for towed fluorometry.	Incident Commander Environment Unit Leader	❑
	Determine suitability of subsea gliders for monitoring.	Sub surface gliders containing fluorometers built into the body of the glider may be used for this monitoring and would be preferential for monitoring a continuous subsea release (well leak scenario).	Environment Unit Leader	❑
	If gliders and pilot/s available and suitable for incident, engage provider to develop Monitoring Action Plan.	Arrange a joint meeting with spill modelling provider and OSRL/glider operator to develop monitoring design and ongoing data transfer protocols to meet objective of model validation.	Environment Unit Leader	❑
	Source vessels and other logistics to support monitoring.		Logistics Section Chief Operations Section Chief	❑
	Conduct monitoring as per monitoring action plan with deployment area guided by other operational monitoring studies and dispersant application areas.	The scope of monitoring will be dictated by the response strategies being employed. Where dispersants application is being undertaken fluorometry surveys will have to be coordinated with application activities so subsea oil distribution can be assessed before and after dispersant addition in order to determine effectiveness. Appendix F of CSIRO oil spill	Operations Section Chief Planning Section Chief Environment Unit Leader	❑

Santos

Action		Consideration	Responsibility	Complete
		monitoring handbook provide standard operating procedures for monitoring dispersant effectiveness using fluorometry equipment.		
Ongoing Actions	Provide daily data reports and spatial outputs IMT.		Monitoring Provider	❑
	Monitoring results to be incorporated into Common Operating Picture.		Planning Section Chief GIS Support	❑

Table 10-32: Continuous fluorometry surveys – resource capability

Equipment Type/Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
Towed fluorometers	OSRL	Towed Fluorometers: seven Turner C3 fluorometers globally	4 in Southampton, 2 in Singapore and 1 in Fort Lauderdale	<72 hours
Glider mounted fluorometers	OSRL	Subsea glider: Qty subject to availability from OSRL contractor – one engineer from OSRL contractor to deploy and operate the Glider	Gliders based in Perth OSRL towed fluorometers out of Singapore, Southampton and Fort Lauderdale	<72 hours dependent upon availability
Vertical particle size analyser – Sequoia LISST 100x	Monitoring Service Provider (currently Astron/BMT)	1	Perth	<72 hours
Water quality monitoring personnel to operate towed fluorometers	Monitoring Service Provider (currently Astron/BMT)	Approx. 6 (based on capability reports)	Perth based	<72 hours
Glider (remote) pilot/s and deployment crew	Third-party provider via OSRL	Subsea glider: Qty subject to availability from OSRL contractor – one engineer from OSRL contractor to deploy and operate the glider	Perth based pilot and deployment crew	<72 hours dependent upon availability

Table 10-33: Operational water quality sampling and analysis – first strike response timeline

Task	Time from IMT call-out
IMT activates OSRL and Monitoring Service Provider.	<4 hours
Monitoring Service Provider water quality monitoring personnel deployed to site.	<72 hours
Towed fluorometers deployed to site.	<72 hours
Glider and pilot/s and deployment crew deployed (if gliders available and appropriate).	<72 hours (if gliders available and appropriate)
Minimum Resource Requirements	
+ Water quality monitoring vessel/s – refer Santos Offshore ER Intranet for vessel specification. + Water quality monitoring team (through monitoring service provider). + OSRL towed fluorometer (Turner C3). + Particle size analyser.	

10.8 Shoreline clean-up assessment

Table 10-34 provides the Environmental Performance Outcome, initiation criteria, termination criteria and other key aspects for this strategy.

Table 10-34: Shoreline clean-up assessment– environmental performance outcome, initiation criteria and termination criteria

Environmental Performance Outcome	Implement monitor and evaluate tactics in order to provide situational awareness to inform IMT decision -making	
Initiation criteria	Level 2 or 3 spills – may be deployed in a Level-1 incident (to be determined by OSC)	
Applicable hydrocarbons	**Caley Condensate**	**MDO**
	✓	✓
Termination criteria	As directed by the relevant Control Agency	

To assist in determining which response methods are most appropriate for shorelines, it is necessary to obtain information about shoreline character (topography, complexity, exposure, etc), degree and distribution of oiling (if present), presence of sensitive receptors (habitats, fauna, etc) and information on shoreline processes and access routes that could aid or hamper response efforts. This detailed information can be collected from shoreline clean-up assessments. A well-established systematic approach known as Shoreline Clean-up Assessment Technique (SCAT) will be used to document the status of oiled shorelines in the event of a worst-case release and their subsequent treatment recommendations.

DoT are the designated Control Agency for shoreline response for spills within WA waters and will direct resources provided through Santos for the purposes of shoreline clean-up assessments and shoreline response activities. Santos will provide additional information on shoreline character and oiling collected as part of aerial surveillance activities carried out under its control (refer **Section 10.2**). DAWE are the designated Jurisdictional Authority for all spills that contact the shorelines of Ashmore Reef AMP identified in this OPEP; the Santos IMT (as Control Agency for this island as they are in Commonwealth waters) will liaise with DAWE to direct resources for the purposes of shoreline clean-up activities.

Existing information on shoreline character, distribution of habitats/fauna and access/safety constraints can be obtained from:

+ Santos Energy GIS, including habitat/fauna distribution layers and aerial imagery
+ Oil Spill Response Atlas Web Map Application
+ Pilbara Region Oiled Wildlife Response Plan
+ WA Marine Oil Pollution Risk Assessment Web Map Application (rankings and general information on protection priorities).

10.8.1 Implementation guidance

The information provided below is included for planning purposes and represents how Santos would approach shoreline clean-up assessments. In the event of a spill with the potential for shoreline contact in WA waters, DoT, will control shoreline assessments and ultimately personnel supplied through Santos will follow the direction of DoT; this may differ from that included below.

DoT provides guidance on shoreline assessments within their Oil Spill Contingency Plan.

Table 10-35 presents considerations for planning and conducting the assessments.

The implementation guide for Shoreline Clean-up Assessment is found in **Table 10-36**.

Table 10-37 provides a list of resources that may be used to implement this strategy and **Table 10-38** details the minimum first strike mobilisation requirements for Santos on activation.

Table 10-42 lists the Environmental Performance Standards and Measurement Criteria for this strategy.

Table 10-35*: Shoreline clean-up assessment considerations*

Considerations for Shoreline and Coastal Habitat Assessment	
Survey design	Shoreline Clean-up Assessment requires a systematic assessment of shorelines, which is typically undertaken in a number of stages (according to the extent of the spill): + Reconnaissance surveys: designed as an initial phase (or further as required, such as inaccessible shorelines) to characterise the distribution, extent, and condition of shoreline habitats + Continual monitoring surveys: monitors hydrocarbon spill extent at the shoreline to assess the potential impact, extent of actual impact, and the effectiveness of clean-up. A shoreline clean-up assessment may include the following tasks: + Assessment of shoreline character, habitats and fauna, including: – shoreline structured biotic habitats – distribution of fauna – shoreline and processes (e.g. wave, tidal flows – shoreline substrate (e.g. mud, sand, pebble, rock) – shoreline form (e.g. width, shape and gradient) – access/safety constraints. + Assessment of shoreline oiling (if present): – surface distribution and cover

Considerations for Shoreline and Coastal Habitat Assessment	
	– subsurface distribution – oil type, thickness, concentration and physical character – sampling of oil for laboratory analysis. + Recommendations for response: – applicable strategies based on oil type and habitat – potential access, safety and environmental constraints – likely resourcing (personnel and equipment) requirements. Ground surveys undertaken on foot, by vehicles or by small vessel will occur at prioritised areas to provide a close-range assessment of shoreline physical characteristics, coastal habitats/fauna, scale and character of oiling and safety/access constraints. Shoreline clean-up assessment team leaders will include personnel from AMOSC Core Group, State and National Response Team and OSRL, or contracted staff who have completed SCAT training. Team members may include personnel who have completed a brief training course and are supervised on the job by team leaders, particularly for deployment to locations that are not contacted in the first few weeks of the spill. The deployment of ground survey teams will be directed by DoT as the HMA and Control Agency for coastal/shoreline pollution in WA. The deployments will be informed by the observed and predicted contact of oil and from existing baseline information on shoreline character. Shoreline surveys will be undertaken within segments that are recorded and/or mapped that share common traits based on coast geomorphology, habitat type, fauna presence, level of oiling or access. Information on shoreline character and habitat/fauna distribution for each segment should be recorded through the use of: + still or video imagery collected with simultaneous GPS acquisition + field notes together with simultaneous GPS acquisition + mud maps outlining key natural features, oil distribution, imagery locations of quantitative data (transects, oil samples) + transects (cross-shore, longshore) and vertical sediment profiles. + samples of oil and/or oiled sediments. The parameters that should be assessed are: + physical characteristics: rocky, sandy beach, flat, dune, other wetland + major habitat types: mangrove, salt marsh, saltpan flats, fringing reef, rubble shore, seagrass verge + coastal fauna and key habitats (e.g. nests) including quantification/distribution of oiled fauna + state of erosion and deposition: deposition, erosion, stable + human modified coastline (access tracks, facilities, etc) + oil character, if present, including appearance, surface thickness, depth (into sediments), distribution, area and percentage cover.
Analysis and reporting	Shoreline survey reports to be submitted to the Control Agency IMT at completion of assessments. All raw data collected will be included as appendices to the report and provided in a geospatial format for subsequent use in GIS mapping software.

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Table 10-36: Shoreline clean-up assessment – implementation guidance

Action		Consideration	Responsibility	Complete
Initial Actions	Ensure initial notifications to WA DoT have been made.	Refer to **Section 7** for reporting requirements.	Environment Unit Leader	❑
	Collect and provide spill trajectory modelling, other operational monitoring data and existing sensitivity information/mapping to Control Agency for assistance in identification of priority protection areas and Operational NEBA.	Existing shoreline sensitivity mapping information for potential oil contacted locations is available on the Santos ER intranet site.	Environment Unit Leader Planning Section Chief	❑
	Actions below are indicative only and are at the final determination of the Control Agency			
	Mobilise the AMOSC core group responders as required for industry support to Control Agency.	Refer to **Table 10-37**.	Incident Commander Operations Planning Section Chief Logistics Planning Section Chief	❑
	Conduct assessment of shoreline character, habitats and fauna.	Refer to **Table 10-35**. Refer to the WA DoT Shoreline Assessment Form for spills contact WA shorelines	AMOSC Core group and Control Agency	❑
	Conduct assessment of shoreline oiling (if present).	Refer to **Table 10-35**.	AMOSC Core group and Control Agency	❑
	Develop recommendations for clean-up activities and clean-up end-points and communicate recommendations and SCAT forms back to IMT at the end of each operating period.	Refer to **Table 10-35**.	AMOSC Core group and Control Agency	❑

Table 10-37: Shoreline clean-up assessment – resource capability

Equipment Type/Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
Santos and WA industry AMOSC core group staff and responders (team leaders) (Trained field response personnel - surge capacity; details provided in **Appendix T**: Cumulative Response Capability Assessment)	Santos Core Group Industry Core Group AMOSC staff	12 84 (minimum) 16	Perth, Geelong, Fremantle, Dampier, Varanus Island and other NW locations	<24 hours from time of shoreline contact prediction
Shoreline assessment team members	Santos contracted Work Force Hire company (e.g. Dare)	As per availability (up to 2,000)	Australia-wide	Subject to availability (indicatively 72+ hours)
Drones and pilots ** To assist shoreline and vessel-based surveillance	AMOSC OSRL – Third-Party UAV provider Local WA hire companies	2 x pilots 2 x qualified remote pilots, however response is on best endeavour 10+	Geelong Perth Perth and regional WA	<48 hours OSRL – depending on the port of departure, one to two days if within Australia

Table 10-38: Shoreline assessment – first strike response timeline

Task	Time from shoreline contact (predicted or observed)
IMT confirms shoreline contact prediction and begins sourcing personnel for shoreline clean-up assessment team.	<4 hours
AMOSC core group and drone pilots (shoreline clean-up assessment personnel) mobilised to deployment location.	<24 hours
Minimum Resource Requirements	
+ Minimum two AMOSC core group personnel. + Two AMOSC drones + Minimum two AMOSC core group personnel to undertake initial vessel or ground surveys.	

10.8.2 Resourcing requirements

Shoreline clean-up assessment teams will comprise two to three members per team and are assumed to be able to cover 10 km per team per day. Teams may be able to exceed this distance, especially if remote sensing techniques (e.g. UAVs) are employed to cover shorelines that have access limitations, which includes many receptor locations in the EMBA.

Santos has used both stochastic and deterministic modelling data for shoreline contact to plan for the worst-case shoreline and habitat assessment personnel requirements. **Table 10-39** and **Figure 10-1** presents all receptors contacted at >100 g/m^2 using the stochastic modelling results for the surface LOWC along with the SCAT planning considerations and estimated number of SCAT teams required. It should be noted that not all of the receptors listed in **Table 10-39** will be contacted by one single spill. These results are presenting the range of possible worst-case timeframes to contact and length contacted based on all runs that make up the stochastic model. Santos will use initial operational monitoring data (e.g. trajectory modelling and aerial surveillance) to determine where resources should be allocated. This may include directing resources to conduct SCAT at locations not identified as protection priority areas, to determine if protection and clean-up activities may be required at these receptors.

Initially, shoreline clean-up assessment may be conducted via reconnaissance surveys and later confirmed via ground and/or vessel surveys. For example, **Table 10-39** shows Bedout Island may be contacted within 2.0 days, therefore reconnaissance surveys may be employed to provide initial assessments for these remote shorelines.

Deterministic run #9 (Surface LOWC) (**Table 10-41** and **Figure 10-2**) was selected to guide resourcing estimates for SCAT as it was the simulation with the maximum length (km) of shoreline oiled >100 g/m^2 and contacted the largest number of islands. In addition, deterministic run #5 (Surface LOWC) (**Table 10-40** and **Figure 10-3**) was selected to compare resourcing estimates, based on it being the run with the earliest arrival times of oil ashore. These runs have been selected to compare the shoreline clean-up assessment needs against the stochastic shoreline clean-up assessment needs (**Table 10-39).**

For worst-case personnel requirements, Ningaloo Coast North presents the greatest resource requirement of 36 to 54 personnel (up to 18 teams of two to three members each), for deterministic run #5 (**Table 10-40**).

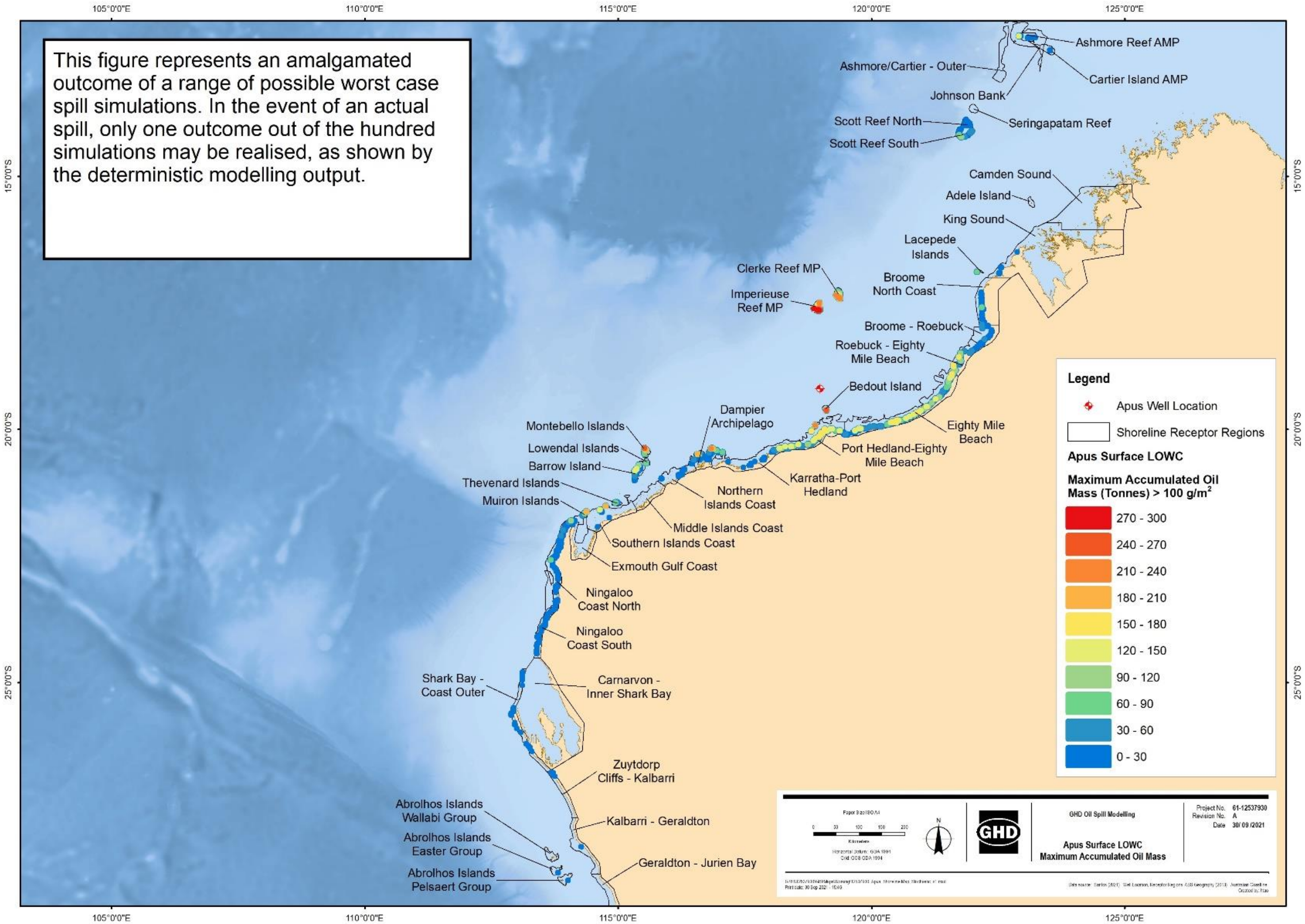

Figure 10-1: All receptors contacted at >100 g/m² using the stochastic modelling results for the surface LOWC

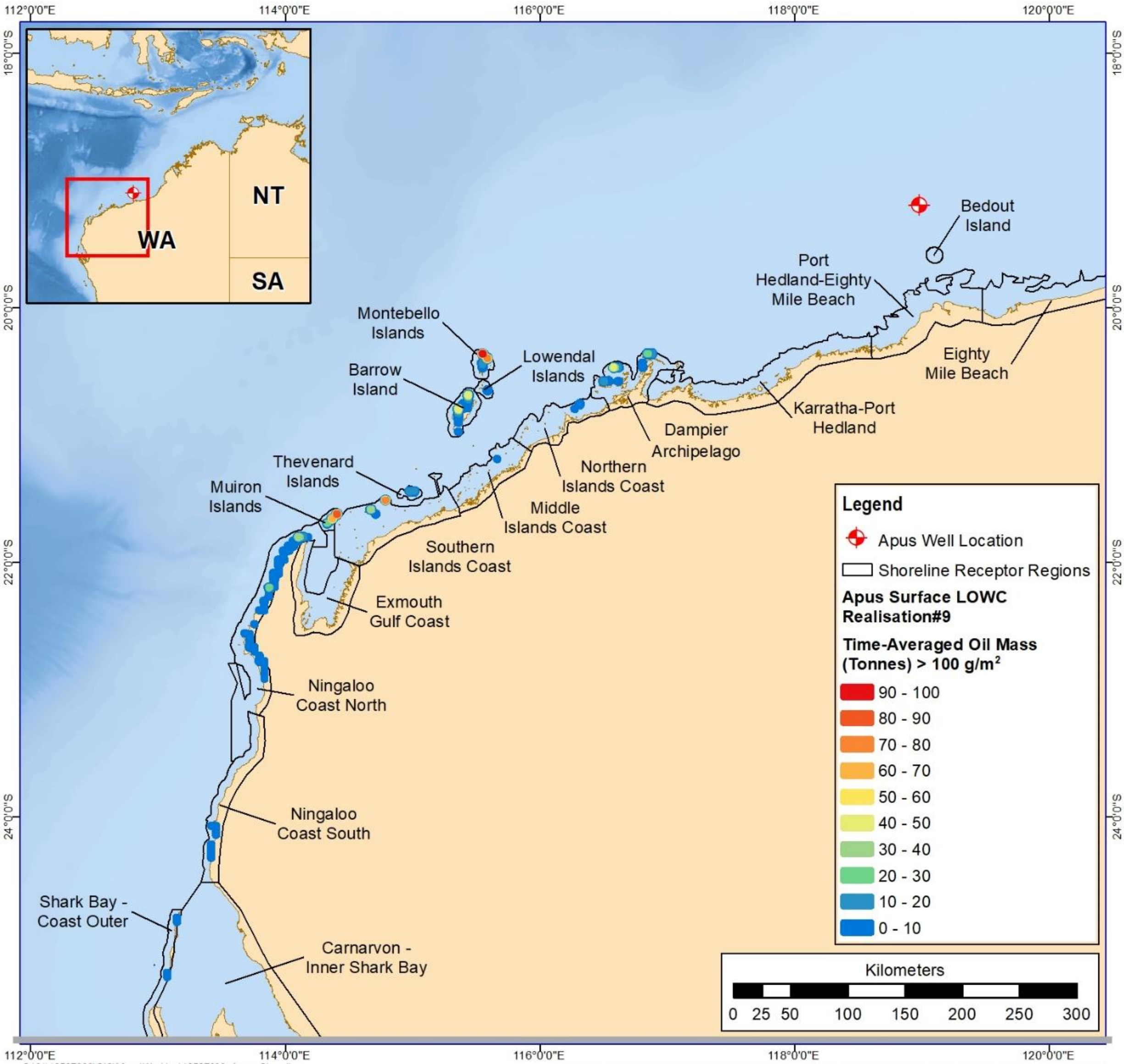

Figure 10-2: Simulation with the maximum length (km) >100 g/m² using deterministic modelling results from simulation #9 for the surface LOWC.

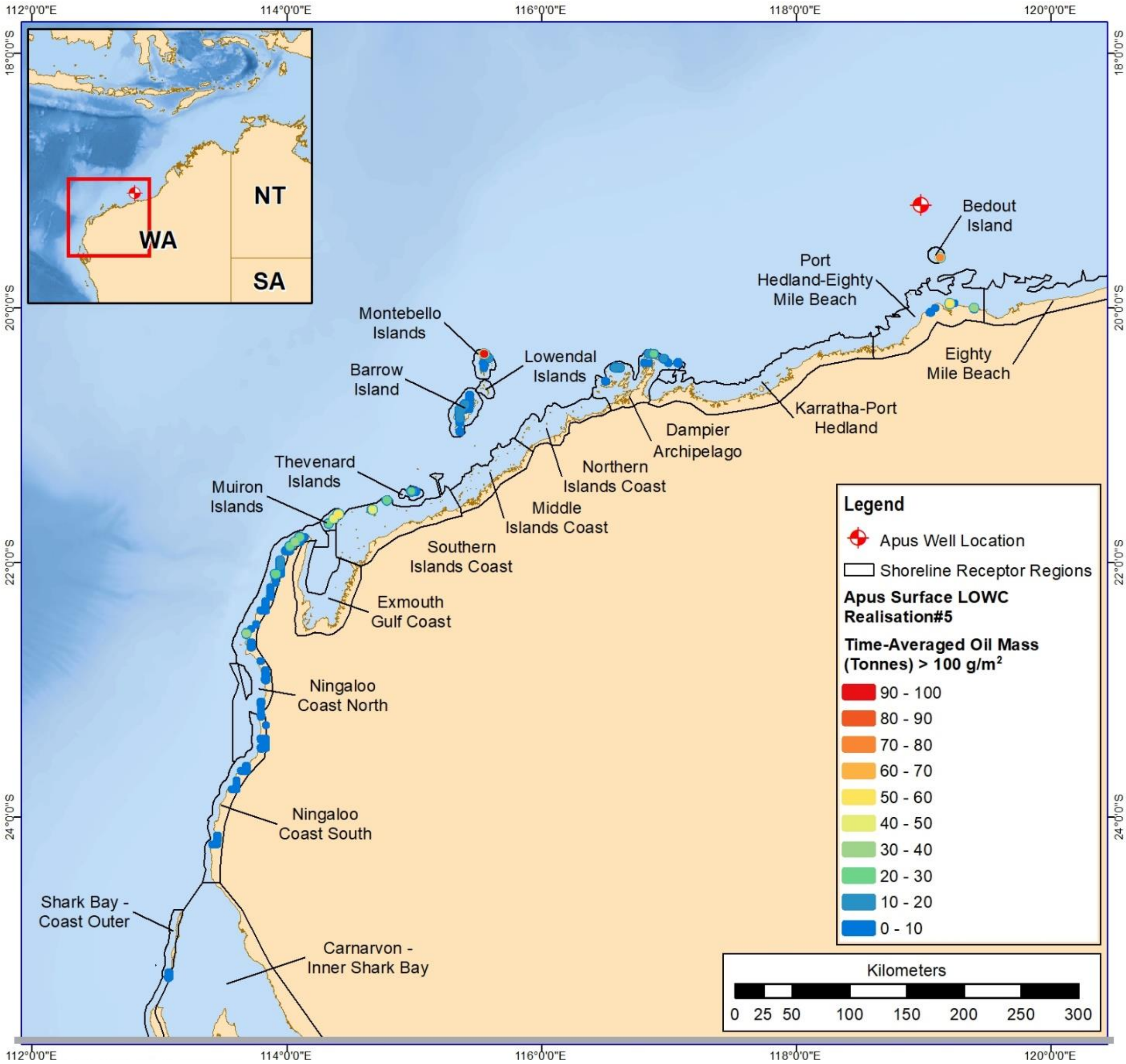

Figure 10-3: Simulation with the earliest contact time >100 g/m² using deterministic modelling results from simulation #5 for the surface LOWC.

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Table 10-39: Resource requirements for shoreline clean-up assessment for all locations contacted >100 g/m^2 based on stochastic results for surface LOWC (GHD, 2021b)

All receptors	Minimum time (days) to contact with receptor >100 g/m^2 from stochastic results	Maximum length (km) of shoreline oiling > 100 g/m^2 in from stochastic results	Planning considerations	Estimated No. of teams required
Cartier Island AMP	84.6	0.6	Initial assessment can be conducted via UAVs. Islands close to each other so sharing resources is preferable.	1
Ashmore Reef AMP	62.3	5.0		1
Scott Reef North	46.4	51.2	Mainly intertidal habitat, so use of vessels and UAVs would be more suited to conditions.	1-2
Scott Reef South	39.0	56.9		
Clerke Reef MP	16.3	51.2	Islands located close to each other so sharing resources is preferable.	1-2
Imperieuse Reef MP	11.4	56.9		1-2
Bedout Island	2.0	1.1	Island surrounded by intertidal habitat. Shallow vessels required.	1
Port Hedland - Eighty Mile Beach	2.9	91.0	Mainland locations, moderately good access.	8-9
Karratha – Port Hedland	6.6	51.2		5
Dampier Archipelago	12.1	96.6		9-10
Northern Islands Coast	26.3	22.7		2
Montebello Islands	16.8	22.7		2

All receptors	Minimum time (days) to contact with receptor >100 g/m^2 from stochastic results	Maximum length (km) of shoreline oiling > 100 g/m^2 in from stochastic results	Planning considerations	Estimated No. of teams required
Lowendal Island	27.9	5.7	Offshore Islands with varied access. Facilities exist at Thevenard and Barrow Islands.	1
Barrow Island	19.3	68.2		5-6
Thevenard Island	23.9	11.4		1
Southern Islands Coast	24.9	22.7		2
Muiron Islands	26.6	17.1		1-2
Exmouth Gulf Coast	NC	NC	Mainland locations, moderately good access.	n/a
Ningaloo Coast North	30.6	227.4		20-22
Ningaloo Coast South	52.3	68.2		6-7
Shark Bay- Coast outer	59.0	34.1		3
Zuytdorp Cliffs – Kalbarri	92.9	17.1		2
Kalbarri – Geraldton	108.6	5.7		1
Abrolhos Islands Easter Group	104.6	5.7	Offshore Islands with varied access.	1

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All receptors	Minimum time (days) to contact with receptor >100 g/m^2 from stochastic results	Maximum length (km) of shoreline oiling > 100 g/m^2 in from stochastic results	Planning considerations	Estimated No. of teams required
Abrolhos Islands Pelsaert Group	105.9	5.7		1
Eighty Mile Beach	11.4	136.4	Mainland locations, moderately good access.	10-13
Broome – Roebuck	31.8	17.1		2
Roebuck- Eighty Mile Beach	14.8	56.9		5-6
King Sound	62.9	5.7		1
Broome North Coast	35.9	34.1		3

Note: SCAT numbers not to be added up as spill will not contact all receptors modelled. Number required will be based on direction of spill and timeframes to contact.

Table 10-40: Resource requirements for shoreline clean-up assessment for protection priority areas based on deterministic run #5 (GHD, 2021b)

PPA	Minimum time (days) to contact with receptor >100 g/m^2 in the worst deterministic simulation	Maximum length (km) of shoreline oiling > 100 g/m^2 in the worst deterministic simulation	Estimated No. of teams required
Eighty Mile Beach	3.0	28.4	2-3
Dampier Archipelago	64.8	56.9	5-6
Montebello Islands	63.0	22.7	2
Barrow Island	64.1	62.5	6
Southern Islands Coast	72.3	11.4	1
Muiron Islands	68.3	17.1	1
Ningaloo Coast North	77.1	187.6	15-18
Ningaloo Coast South	101.7	102.3	8-10
Bedout Island	2.0	1.1	1
Total estimated SCAT teams required			**41-48**

Table 10-41: Resource requirements for shoreline clean-up assessment for protection priority areas based on deterministic run #9 (GHD, 2021b)

PPA	Minimum time (days) to contact with receptor >100 g/m^2 in the worst deterministic simulation	Maximum length (km) of shoreline oiling > 100 g/m^2 in the worst deterministic simulation	Estimated No. of teams required
Dampier Archipelago	28.0	51.2	4-5
Lowendal Islands	61.1	5.7	1
Montebello Islands	31.6	22.7	2
Barrow Island	46.3	62.5	4-5
Southern Islands Coast	36.4	17.1	2
Muiron Islands	39.8	17.1	2
Ningaloo Coast North	34.8	60.9	4-6
Ningaloo Coast South	63.7	45.5	3-4
		Total estimated SCAT teams required	**22-27**

10.9 Environmental performance

Table 10-42: Environmental performance – monitor and evaluate

Environmental Performance Outcome	Implement monitor and evaluate tactics in order to provide situational awareness to inform IMT decision-making		
Response Strategy	**Control Measures**	**Performance Standards**	**Measurement Criteria**
Response Preparedness			
Monitor and Evaluate – vessel and aerial surveillance	Maintenance of Master Services Agreements (MSAs) with multiple vessel providers	Santos maintains MSAs with multiple vessel providers as specified in **Table 10-3**	MSAs with multiple vessel providers
	MSA with aircraft supplier	MSA in place with helicopter provider throughout activity	MSA with aircraft suppliers
	Santos trained Aerial Observers	Santos maintains a pool of trained aerial observers	Exercise Records Training Records
	AMOSC contract to facilitate mutual aid arrangements for access to Trained Aerial Observers	Maintenance of AMOSC contract to facilitate mutual aid arrangements for access to Trained Aerial Observers	AMOSC Participating Member Contract
	Access to certified UAV providers	Maintenance of contract for access to UAV providers	Maintenance of contract with service provider
	Aircraft charter companies for fauna observations	Maintain a list of aircraft charter companies that could potentially provide fauna observation services	List of providers
Response Implementation			
Monitor and Evaluate – vessel and aerial surveillance	Vessel surveillance	Minimum first strike resource requirements mobilised in accordance with **Table 10-4**	Incident log
		Daily observation reports submitted to IMT until termination criteria is met	Incident log
	Vessels and aircraft compliant with Santos' Protected Marine Fauna Interaction and Sighting Procedure (EA-91-11-00003)	Vessels comply with Santos' Protected Marine Fauna Interaction and Sighting Procedure (EA-91-11-00003) which ensures compliance with Part 8 of the Environment Protection and Biodiversity Conservation Regulations 2000 which includes controls for minimising the risk of collision with marine fauna	Completed vessel statement of conformance
		Aircraft comply with Santos' Protected Marine Fauna Interaction and Sighting	Aircraft contractor procedures align

Environmental Performance Outcome	Implement monitor and evaluate tactics in order to provide situational awareness to inform IMT decision-making		
Response Strategy	**Control Measures**	**Performance Standards**	**Measurement Criteria**
		Procedure (EA-91-11-00003) which ensures compliance with Part 8 of the Environment Protection and Biodiversity Conservation Regulations 2000 which includes controls for minimising interaction with marine fauna	with Santos' Protected Marine Fauna Interaction and Sighting Procedure
	Aerial surveillance	Minimum first strike resource requirements mobilised in accordance with **Table 10-8**	Incident log
		Following initiation two passes per day of spill area by observation aircraft provided	Incident log
		Trained Aerial Observers supplied from Day 2 of response	Incident log
		Flight schedules are maintained throughout response	Incident Action Plan
		Observers completed aerial surveillance observer log following completion of flight	Aerial Observer Logs
Response Preparedness and implementation			
Monitor and Evaluate – tracking buoys	Tracking buoys available	Maintenance of 12 tracker buoys throughout the activity	Computer tracking software Tracker buoy tests
Response Implementation			
Monitor and Evaluate – tracking buoys	Tracking buoy mobilisation	Minimum requirements mobilised in accordance with **Table 10-11**	Incident log
Response Preparedness			
Monitor and Evaluate – oil spill modelling	Maintenance of contracts for emergency response modelling	Maintenance of contract for forecast spill trajectory modelling services throughout activity	Modelling services contract
		Access to additional spill modelling capability to ensure redundancy.	Membership in place with OSRL
Response Implementation			
Monitor and Evaluate – oil spill modelling	Oil spill modelling	Oil Spill Modelling provider will be contacted immediately (within two hours) upon notification of a Level 2 or 3 spill	Incident Log
		Modelling delivered to IMT within two hours of request to service provider	Incident Log

Environmental Performance Outcome	Implement monitor and evaluate tactics in order to provide situational awareness to inform IMT decision-making		
Response Strategy	**Control Measures**	**Performance Standards**	**Measurement Criteria**
Response Preparedness			
Monitor and Evaluate – satellite imagery	Satellite imagery	Contract in place with third party provider to enable access and analysis of satellite imagery	Contract with service provider
Response Implementation			
Monitor and Evaluate – satellite imagery	Satellite imagery	Data incorporated into common operating picture and provided to spill modelling provider	Incident Log and Incident Action Plan
Response Preparedness			
Monitor and Evaluate – oil and oil in water monitoring	Maintenance of Monitoring Service Provider contract for water quality monitoring services	Maintain access to specialist monitoring personnel and equipment by maintaining contract with Monitoring Service Provider throughout activity as per **Table 10-23.**	Contract with monitoring service provider
	Capability reports from Monitoring Service Provider	Obtain monthly capability reports from Monitoring Service Provider	Capability reports
	Entrained oil monitoring equipment and services	Maintenance of arrangements to enable access to fluorometry services throughout activity	Arrangement with provider of fluorometry equipment
	Water quality monitoring vessels	Maintenance of vessel specification for water quality monitoring vessels	Vessel specification
	Oil and water quality monitoring equipment	Oil sampling kits pre-positioned at Exmouth, Dampier and Varanus Island	Evidence of deployment to site
Response Implementation			
Monitor and Evaluate – oil and oil in water monitoring	Initial Oil Characterisation	Minimum requirements mobilised in accordance with **Table 10-24.**	Incident Log
		Oil samples sent to laboratory for initial fingerprinting	Incident Log
		If applicable (not MDO), oil samples sent to laboratory for dispersant amenability	Incident Log
		Oil samples to be sent immediately for laboratory ecotoxicity testing of oil	Incident Log

Environmental Performance Outcome	Implement monitor and evaluate tactics in order to provide situational awareness to inform IMT decision-making		
Response Strategy	**Control Measures**	**Performance Standards**	**Measurement Criteria**
		90, 95 and 99% Species protection triggers levels will be derived from ecotoxicity testing results (minimum five species' tests) within 24 hours of receiving all results	Ecotoxicity report from environmental contractor
	Operational water quality monitoring	IMT activates monitoring service provider within four hours	Incident Log
		Operational water sampling and analysis surveys mobilised within 72 hours of approval	Incident Log
		Fluorometry surveys mobilised within five days of initiation	Incident Log
		Daily report including fluorometry results provided to IMT	Incident Log
Response Preparedness			
Monitor and Evaluate – shoreline clean-up assessments	SCAT trained personnel are available	Maintenance of AMOSC contract to facilitate mutual aid arrangements for access to Oil Spill Responders **Table 10-37.** Maintain capability throughout activity through AMOSC Core Group, DoT State Response Team, AMSA National Response Team, OSRL and The Response Group (TRG)	AMOSC Participating Member Contract, MoU for access to National Plan resources through AMSA, OSRL Associate Contract and TRG arrangements.
The performance standards for TRP's are found in **Section 8.3.**			
Response Implementation			
Monitor and Evaluate – shoreline clean-up assessments	SCAT	SCAT trained personnel are mobilised as per the numbers and deployment schedules provided in **Table 10-38**	Incident Log
		SCAT will be implemented under the direction of DoT as the HMA	Incident Log
		SCAT team leader positions will be filled with personnel trained in shoreline clean-up assessment techniques	Training records
		Santos will make available at OSRO responders for SCAT positions to the Control Agency	Incident Log

Environmental Performance Outcome	Implement monitor and evaluate tactics in order to provide situational awareness to inform IMT decision-making		
Response Strategy	**Control Measures**	**Performance Standards**	**Measurement Criteria**
		If required ongoing SCAT teams will be available to meet the requirements specified in **Table 10-40** and **Table 10-41.**	Incident Log
		SCAT reports provided to the IMT daily detailing the assessed areas to maximise effective utilisation of resources	Incident Log
	Just-In-Time training	Training providers and personnel providers contacted during week 1 to initiate training	Incident Log
	Use of shallow draft vessels for shoreline and nearshore operations	Shallow draft vessels are used for shoreline and nearshore operations unless directed otherwise by the designated Control Agency (i.e., DoT)	Vessel specification documentation contained in IAP.
	OSR Team Leader assessment/selection of vehicle appropriate to shoreline conditions	OSR Team Leader assess/select vehicles appropriate to shoreline conditions	IAP demonstrates requirement is met
	Conduct shoreline/ nearshore habitat/ bathymetry assessment	Unless directed otherwise by the designated Control Agency (i.e., DoT) a shoreline/nearshore habitat/bathymetry assessment is conducted prior to nearshore activities	IAP records assessment records
	Establish demarcation zones for vehicle and personnel movement considering sensitive vegetation, bird nesting/ roosting areas and turtle nesting habitat	Unless directed otherwise by the designated Control Agency (i.e., DoT) demarcation zones are mapped out in sensitive habitat areas	IAP demonstrates requirement is met
	Operational restriction of vehicle and personnel movement to limit erosion and compaction	Unless directed otherwise by the designated Control Agency (i.e., DoT) action plans for shoreline operations include operational restrictions on vehicle and personnel movement	IAP demonstrates requirement is met

11 Containment and Recovery Plan

Table 11-1 provides the environmental performance outcome, initiation criteria and termination criteria for this strategy.

Table 11-1: Containment and recovery – environmental performance outcome, initiation criteria and termination criteria

Environmental Performance Outcome	Implement containment and recovery tactics to reduce the volume of surface hydrocarbons to reduce contact with protection priorities	
Initiation criteria	Notification of a condensate spill	
Applicable hydrocarbons	**Caley Condensate**	**MDO**
	✓	✗
Termination criteria	+ NEBA is no longer being achieved, and + Agreement is reached with Jurisdictional Authorities to terminate the response	

11.1 Overview

Booms and skimming equipment can be used to create physical barriers on the water surface to contain and recover the oil to remove risk of oil contacting environmental, social and cultural sensitivities. This strategy is often used in the offshore environment in close proximity to the hydrocarbon source. Once contained, an attempt to recover the hydrocarbons from the surface waters can be undertaken.

Table 11-2 provides applicability criteria on when containment and recovery may be a suitable response option. Further definition of BAOACs is provided in **Table 13-2**.

Table 11-2: Containment and recovery application criteria

Criteria	Recommended	Not Recommended
Spill characteristics	+ Patchy slick + Extended operations + Surface concentrations >50 g/m² (BAOAC of 4) at a minimum, 100 g/m² (BAOAC of 5) is optimal	+ Situation dependent + Surface thickness <50 g/m² (BOAC <4)
Hydrocarbon type	+ Group 3 hydrocarbons and above + Persistent components of Group 1 and 2 hydrocarbons may be suitable	+ Minor to moderate spills of Group 1 and 2 hydrocarbons are likely to weather rapidly. High volatiles of these hydrocarbons may be a safety risk to personnel
Operating environment	+ Waves <1 m for nearshore containment and recovery systems (Santos Expandi Boom) + Waves <1.8 m for offshore systems + Winds <20 knots	+ Wave heights exceed 1.8 m + Current >0.75 knots

11.2 Implementation guidance

Table 11-3 provides guidance to the IMT on the actions and responsibilities that should be considered when selecting this strategy. **Table 11-4** provides a list of resources that may be used to implement this strategy. Mobilisation times for the minimum resources that are required to commence initial containment and recovery operations are listed in **Table 11-5**. The Incident Commander is ultimately responsible for the response, and may therefore determine that some tasks be varied, should not be implemented or be reassigned.

Table 11-3: Implementation guidance – containment and recovery

	Action	Consideration	Responsibility	Complete
Initial Actions	**Containment and recovery**			
	Identify and activate containment and recovery equipment stockpiles based on incident location. Initial equipment mobilisation from Karratha, Exmouth and Dampier.	Refer to **Table 11-4** for location of containment and recovery resources. Initial deployment from Karratha, Dampier or Exmouth pending vessel availability. Up to date stockpile information accessed through Santos' Emergency Response Intranet Site.	Logistics Section Chief Supply Unit Leader Operations Section Chief	❑
	Identify suitable deployment vessels/crew. Mobilise resources port location – Karratha, Exmouth and Dampier.	Refer to **Table 11-4** for location of containment and recovery resources. Initial deployment from Karratha, Dampier or Exmouth pending vessel availability. Preference will be for vessels and crew that are exercised in regular Santos booming exercises.	Logistics Section Chief Supply Unit Leader Operations Section Chief	❑
	Assess the spill trajectory modelling, other operational monitoring data to identify operational area for containment and recovery (C&R) deployments.	Refer to **Table 11-2** for guidance.	Operations Section Chief Planning Section Chief	❑
	Confirm conditions are suitable for containment and recovery activities.	Refer to **Table 11-2** for guidance.	Operations Section Chief Planning Section Chief	❑

	Action	Consideration	Responsibility	Complete
	Mobilise deployment personnel to nominated marine base(s).	Each vessel conducting containment and recovery is to be manned with a trained AMOSC, Santos or OSRL Oil Spill Responder, who is the Team Leader tasked with controlling the operations and implementing them in a safe and responsible method. The Team Leader has the responsibility of evaluating the effectiveness of the containment and recovery operations and communicating the information to the IMT Operations Section Chief.	Operations Section Chief Logistics Section Chief	❑
	Coordinate aerial surveillance support to vessels to ensure they are being directed to priority locations for containment and recovery activities within operational zones.	Focus on containment and recovery activities to areas of slick of a sufficient thickness whereby containment and recovery activities will be effective. Refer to **Table 11-2** for guidance.	Planning Section Chief Operations Section Chief	❑
	Direct containment and recovery operations to designated operational zones.	The base case restrictions for containment and recovery is no operations within 25 km of well site.	Operations Section Chief	❑
	Decanting (if selected)			
	Obtain decanting approval from AMSA (Commonwealth waters) or DoT (WA waters).	Under both MARPOL and POWBONS, decanting must be approved by the relevant Jurisdictional Authority where the discharge will occur. Approval should be sought to discharge water that has separated from oil into the apex of the already deployed containment boom system (with operational skimmer). This will increase the oil strong capacity of storage tanks.	Environment Unit Leader	❑
	Ensure personnel onboard the vessels are familiar with decanting procedure approved by the relevant authority AMSA (Commonwealth waters) or DoT (WA waters).		Operations Section Chief	❑

Action		Consideration	Responsibility	Complete
	Commence decanting operations, ensuring that any discharged water is directed into the apex of the already deployed containment boom system (with operational skimmer).		Vessel Master/s	❑
	Ensure there is sufficient temporary storage for oily wastewater onboard vessel.		Operations Team Leader	❑
Ongoing Actions	**Containment and recovery**			
	Coordinate the dispatch of operationally ready (all equipment and personnel on board) vessels via the IAP.	Equipment will be maintained and replaced if necessary through existing stockpiles.	Operations Section Chief	❑
	Maintain operational zones and provide updates to Vessel Masters on most suitable locations for containment and recovery operations.	Continue to utilise aerial surveillance data to inform the location of operational zones.	Operations Section Chief	❑
	Develop waste transfer process to secondary vessels/barge to enhance C&R vessel operational time, reduce port visits for waste unloading and reduce contamination.	Consider location and size/ type of waste collection vessel/barge and suitability of equipment and waste receptacles for dynamic lifts. Consider waste transfer to Dampier port rather than Exmouth which is a small multi-use port facility.	Operations Section Chief Planning Section Chief Logistics Section Chief	❑

Action		Consideration	Responsibility	Complete
	Decanting (if selected)			
	Record volumes of all water decanted.	This information must be supplied to the relevant jurisdictional authority.	Vessel Master/s	❑
	Manage any solid wastes generated.		Vessel Master/s	❑

Table 11-4: Containment and recovery – resource capability

Equipment Type/Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
Santos Expandi Boom (inshore/calm seas deployment) c/w accessories and powerpacks	Santos	Dampier container (two 200 m booms + accessories) VI Containers four 200 m boom and accessories	Dampier, Varanus Island	Within 12 hours (for Dampier or VI based deployment)
Santos Disc/Brush Skimmers (Desmi DBD16) (inshore/calm seas deployment) c/w hoses/powerpacks	Santos	Two (one each: Dampier and VI)	Dampier, Varanus Island	Within 12 hours (for Dampier or VI based deployment)
AMOSC Offshore containment and Recovery Boom AMOSC Offshore Skimmers	AMOSC	2 x 200 m Offshore Boom on Hyd. Reel 15 x Ro Boom (200 m) 1 x Current Buster Boom System 1 x Speed Sweep system 6 x LWS 500 Weir Skimmer GT 185 Weir Skimmer	Broome – 2 (Offshore Boom) Exmouth – 2; Fremantle – 6 Geelong – 7 Geelong – 1 Geelong – 1 Fremantle – 3; Geelong –3 Exmouth – 1	Response via duty officer within 15 minutes of first call – AMOSC personnel available within 1 hour of initial activation call. Equipment logistics varies according to stockpile location (refer **Table 10-12**)

Equipment Type/Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
AMSA Offshore containment and Recovery Boom AMSA Offshore Skimmers	AMSA	8 x RO Boom (200 m) 4 x Vikoma Hi Sprint Boom – four 8 x LWS 500 Weir Skimmer 2 x DESMI Termite Skimmer	Karratha – 4; Fremantle – 4 Karratha – 2; Fremantle – 2 Fremantle – 4; Karratha – 4 Fremantle – 1; Karratha – 1	Access to National Plan equipment through AMOSC. Equipment. Logistics varies according to stockpile location (refer **Table 10-12**)
Industry Mutual Aid offshore containment and recovery boom Industry Mutual Aid oil skimmers	Industry Mutual Aid	2 x 200m Offshore Boom (Chevron) 2 x 200m Offshore Boom (Woodside) 2 x Weir Skimmers (Woodside) 1 x Weir Skimmer (Jadestone) 2 x Weir Skimmer (Chevron) 1 x Weir Skimmer (INPEX)	WA	Access to Industry Mutual Aid through AMOSPlan and facilitated by AMOSC
OSRL offshore containment and recovery boom OSRL offshore oil skimmers	OSRL (Guaranteed access to 50% by type of equipment available. Additional access considered on a case-by-case basis.)	37 x Ro Boom (200m) 2 x Hi Sprint Boom (300m) 100 x Ocean Boom (30m) 50 x Offshore recovery skimmers	Singapore, UK, Bahrain, Fort Lauderdale	Response Activation and Mobilisation of OSRL Duty Manager, available within 10 mins of first call. Equipment logistics varies according to stockpile location

Equipment Type/Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
AMOSC offshore waste storage	AMOSC	4 Lancer Barges (25 m^3 each) 6 Deck Bladders (25 m^3 each)	Fremantle –2; Geelong – 2 Fremantle –3; Geelong – 3	Response via duty officer within 15 mins of first call - AMOSC personnel available within 1 hour of initial activation call. Logistics varies according to stockpile location (refer **Table 10-12**)
AMSA offshore waste storage	AMSA	8 x Vikoma Flexidam (10 m^3 each) 5 x Canflex Sea Slug (10 m^3 each) 4 x Vikoma Frost Barge (25 m^3 each) 2 x Covertex tow tank (20 m^3 each)	Fremantle –4; Karratha –4 Fremantle –3; Karratha – 2 Fremantle –2; Karratha – 2 Karratha – 2	Access to National Plan equipment through AMOSC. Logistics varies according to stockpile location (refer **Table 10-12**)
Liquid Waste Tanks	Via North West Alliance contract OEG Contract	As per **Table 17-3**. 42 x ISO Tanks (4 m^3)	Perth, Karratha WA	<24 hours <24 hours. 42 x offshore rated ISO Tanks are readily available through existing contract arrangements through OEG
OSRL offshore temporary waste storage	OSRL (Guaranteed access to 50% by type of equipment available. Additional access considered on a case-by-case basis.)	14 x Storage Barges (50 m^3 each) 21 x Storage Barges (25 m^3 each) 9 x Waste Containment Tanks (10 m^3 each) 2 x Sea Slug (10 m^3 each)	Singapore, UK, Bahrain, Fort Lauderdale	Response Activation and Mobilisation of OSRL Duty Manager, available within 10 mins of first call. Equipment logistics varies according to stockpile location.

Equipment Type/Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
Offshore containment and recovery deployment vessels, towing vessels and barges/tanker for waste oil storage and transfer	Santos contracted vessel providers. Preference for vessels used in Santos deployment exercises	Varies – check through vessel contractors/Santos vessel tracking system. Current availability described in **Section 11.4** and **Appendix U**: Containment and Recovery Logistics	Australia, Singapore	Varies subject to location/ availability.
Personnel (field responders) for OSR strategies (Trained field response personnel - surge capacity; details provided in Appendix T)	AMOSC Staff	16	Fremantle – 5 Geelong – 11	Response via duty officer within 15 minutes of first call. Timeframe for availability of AMOSC personnel dependent on location of spill and transport to site.
	AMOSC Core Group (Santos)	12	Perth/ NW Aus. facilities – ten Port Bonython (SA) – two	From <12 hours (NW-based personnel) From <24 hours (Perth personnel)
	AMOSC Core Group (Industry)	As per monthly availability (minimum 84)	Office and facility location across Australia	Location dependent. Confirmed at time of activation.

Table 11-5: Containment and recovery – first strike response timeline

Task	Time from IMT call-out
IMT confirms applicability of strategy and begins sourcing C&R resources for applicable spills	<3 hours
Santos Offshore Core Group members mobilised to deployment port	<12 hours
C&R equipment (offshore boom/skimmers) mobilised to deployment port	<12 hours
Waste storage equipment mobilised to port	<24 hours
Suitable C&R vessels mobilised to port	<24 hours
C&R trained personnel mobilised to deployment port	<24 hours
C&R operation deployed to spill site (weather/daylight dependent)	<38 hours (weather/daylight dependent)*
Minimum Resources Per Containment and Recovery Unit	
+ Two suitable C&R vessels (one deployment vessel + one tow vessel) + 200 m of offshore boom + One offshore skimmer + Waste storage (comprising a combination of towable bladder, IBCs, Iso-tanks, inbuilt vessel storage tanks allowing for 33 m³ liquid waste volume storage) + One trained responder + Four deployment crew + Personal protective equipment	

**Assumes a 14-hour transit time to spill location (measured to Apus-1 well location) by C&R vessels departing Dampier port (300 km at 12 knots) and that weather/daylight allows operation to commence*

11.3 Resource requirements

11.3.1 Assumptions

Containment and recovery is more effective when a sufficient oil thickness can be achieved by the containment booms (minimum of 50 g/m²). Whilst containment and recovery would not be suitable for Marine Diesel, it could be suitable for Caley Condensate under suitable weather conditions (winds less than 20 knots and currents less than 0.75 knots).

The effectiveness of containment and recovery operations at the release locations is severely restricted by the dominant metocean conditions with wind speeds exceeding 12 knots for over 40% of the time during winter and around 20 to 30% of the time during summer months. Additionally, currents are above 0.75 knots for a significant portion of the year (GHD, 2021b). This means the effectiveness of containment and recovery operations will be severely limited by metocean conditions.

The high evaporation rates associated with the Caley Condensate also mean that it is unlikely to be safe to attempt to recover fresh oil in close proximity to the well (within 25 km of the release location). It is considered that the most effective use of containment and recovery would be at the weathered spill front under suitable metocean conditions. When wind and current speeds are high it can be expected that the oil will naturally entrain, which would preclude successful containment and recovery operations.

To help determine the likely encounter rate from containment and recovery operations, the Boom Encounter Rate Formula in the AMSA Technical Guideline for the Preparation of Marine Pollution Contingency Plans for Marine and Coastal Facilities (2020) has been used.

<u>Boom Encounter Rate (BER) Formula</u> = (Length of Boom (LB) x 0.3) x Velocity of vessel (knots/hr) x Thickness of slick (mm)

LB = assumed as 200 m (based on typical available minimum boom lengths of 200 m)

Velocity = 1 knot

Thickness of slick = 50 g/m^2 or 0.047 mm

Note: percentage cover is assumed to be 100% during initial stages of the operation.

<u>BER = (200 x 0.3) x 1 x 0.047 = 2.82 m^3 per operation/hour x 12 hours of operation = 33 m^3/operation/day</u>

The pour point of LAVRANS is predicted to reach 29 to 33°C (depending on weather conditions) after weathering. This exceeds the typical surface water temperatures (26 to 28°C) for waters associated with the Bedout Multi-Well Drilling EP which would suggest the oil would begin to gel or solidify, however the viscosity would remain relatively low. This can be attributed to the physical network structure which hardens the oil being interrupted by continual wave motion which breaks the waxy structure up (GHD, 2021b).

The relatively low viscosity of LAVRANS means that C&R activities may have limited net environmental benefit. However, due to the wax content of Caley Condensate being slightly higher than that of LAVRANS (9.2% compared to 6%), provision for C&R activities has been retained.

11.3.2 Worst case credible scenario requirements – Apus-2 surface release

Containment and recovery operations are recognised to have low recovery rates in the emergency spill response industry when compared against estimated total spill volumes; the Macondo incident in 2009 (Gulf of Mexico) had an estimated containment and recovery rate of approximately 4% of the total volume of oil spilled, and the MV *Erika* oil tanker spill in 1999 (Atlantic Ocean) had an estimated containment and recovery rate of 6% (IPIECA, 2015c). The Montara well blowout of 2009 had a higher recovery rate due to calm metocean conditions – 10% of the total oil spilled was estimated to be contained and recovered (Montara Commission of Enquiry, 2010) and with only two units in operation throughout the duration of the response (AMSA, 2010).

For planning purposes, the amount of oil that could possibly be recovered by C&R was conservatively assumed as 15% of the surface LOWC spill volume (after 60% volatilisation and 20% submersion within 24 hours and at 5 m/s wind conditions). Using the flow rate outlined in **Appendix S**: Dispersant Supply and Logistics Plan Summaries and assuming that a single unit can remove 33 m^2 per day (231 m^3 per week), a total of 21 units would be required for the duration of the spill (**Table 11-6**). Each unit requires:

+ 1 x Vessel Master
+ 1 x Supervisor
+ 4 x deployment crew.

Deterministic modelling (see **Section 6.4**) also showed that concentrations greater than 50 g/m^2 are likely to be spatially limited to a maximum extent of around 150 km from the LOWC location (GHD, 2021b).

Vessel availability and the capacity to store and transfer oil volumes are key operational factors that need to be effectively managed in order to meet maximum recovery levels. Santos has identified the response need for the number, and storage capacity of containment and recovery vessels in **Section 11.4** and can meet the demand.

In the event that containment and recovery operations are unsuccessful or are scaled down to a lower number of units (as will be indicated in the operational NEBAs conducted throughout the response), vessels originally allocated to containment and recovery operations may be tasked with other response strategies, or return to port.

Table 11-6: Containment and recovery plan calculations

Week	Oil available to recover (m^3) per week following 60% volatilisation and 20 % submersion	Amount of oil that could be recovered (m^3) per week by C&R (assuming 15% recovery rate)	C&R systems
1	32,453	4,868	21
2	31,991	4,799	21
3	31,727	4,759	21
4	31,536	4,730	21
5	31,387	4,708	21
6	31,263	4,690	21
7	31,591	4,739	21
8	31,066	4,660	21
9	30,983	4,648	21
10	30,908	4,636	21
11	30,839	4,626	21

11.4 Containment & Recovery Implementation Plan

The minimum components required for implementing offshore containment and recovery operations are detailed in **Table 11-5**.

For planning purposes, a J-Sweep configuration (**Figure 11-1**) using two vessels, one deployment vessel and one towing vessel, is assumed for each containment and recovery unit.

Figure 11-1: 'J' Configuration for Containment & Recovery Operations (Source: OSRL)

The deployment vessel will have onboard an offshore containment boom, offshore skimmer and a temporary storage capacity of 33 m^3 (as per **Section 11.3.2**). The deployment vessel will be tasked to carry out the deployment of boom, skimmer and towable temporary storage barge (if required) using the towing vessel for support. If required (depending on vessel type), the 33m^3 temporary storage requirement will be achieved using one 25 m^3 towable storage barge and two 4m^3 offshore rated ISO tanks for each containment and recovery unit. The proposed vessel deck layout plan is shown in **Figure 11-2**.

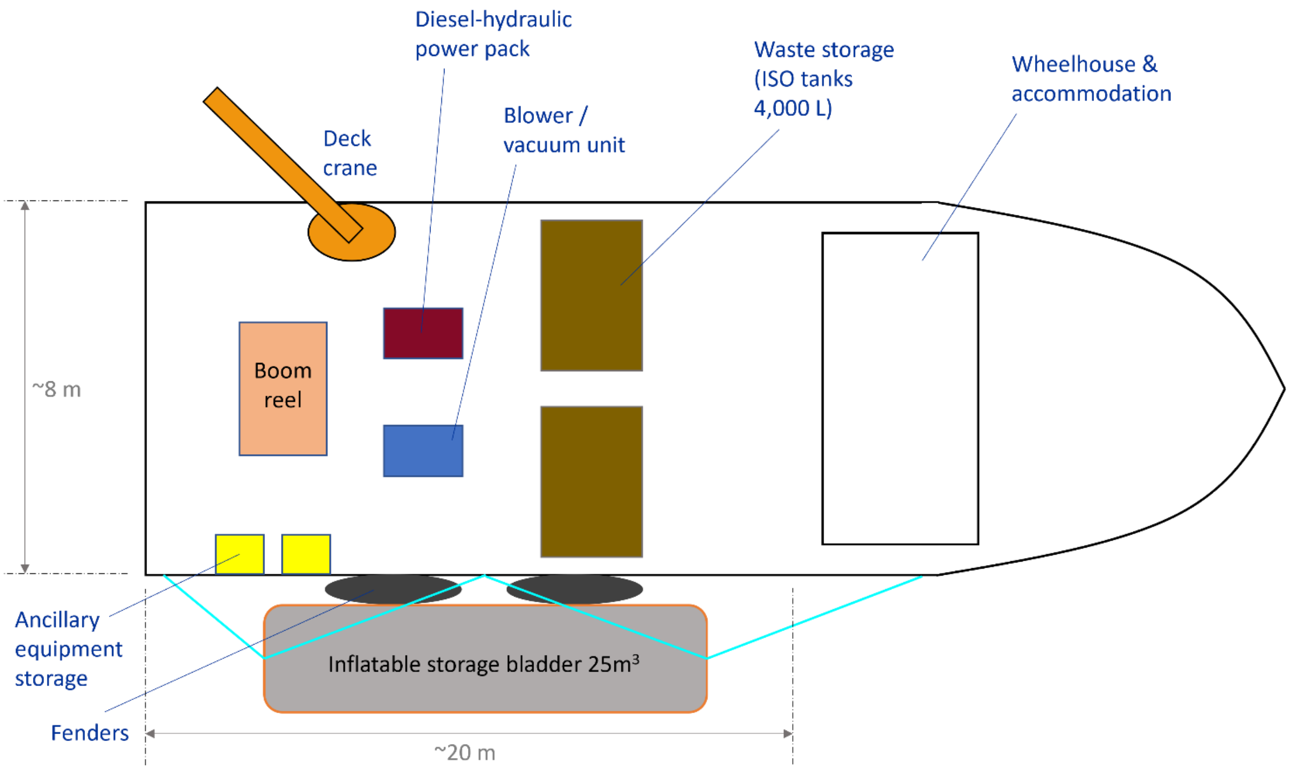

Figure 11-2: Containment and recovery vessel deck layout plan (OSRL, 2021)

The use of vessels of an appropriate specification is essential to ensure successful containment and recovery operations. The required specification for deployment and towing vessels are defined in **Table 11-7**.

Table 11-7: Containment and recovery vessels specification (OSRL, 2021)

Deployment vessels specification	Towing vessels specification
+ Clear deck space, of at least 20 m x 8 m (to safely load, secure and deploy equipment); + Deck crane, capacity of ~1-2 tonnes with 2 m reach + Minimum bollard pull of 8 tonnes + Open stern (to allow pay-out of boom) + Ability to manoeuvre and tow at low speed + Accommodation and shelter for crew	+ Ideally smaller vessel size than deployment vessel, to aid in manoeuvrability + Minimum bollard pull of 8 tonnes + Suitable towing attachment point

The resources available to carry out containment & recovery operations are detailed in **Table 11-4**. Considering the requirement of 200 m offshore boom and one offshore skimmer for each containment and recovery unit, Santos has access to more than the required 21 units through the arrangements with AMOSC, OSRL, AMSA and Industry Mutual Aid (48 offshore booms and skimmers available in total with access to 25 additional booms and skimmers available from OSRL on a case-by-case basis).

Temporary waste storage requirements for containment and recovery operations are assumed to be 33 m^3 per day. Temporary waste storage volumes could potentially be reduced through decanting of water (refer to **Section 11.5**), however, it is assumed for worst-case planning purposes that decanting permission may not be granted by the relevant authority. It is assumed that temporary storage solutions from the OSRO stockpiles are required for each deployment vessel, in the event that vessels with integrated recovered oil storage tanks are not available. The following resources are available through existing arrangements to meet the temporary storage requirements for 21 units as per the configuration shown in **Figure 11-1**:

+ 4 x 25 m^3 Lancer Barges (AMOSC)
+ 6 x 25 m^3 Deck Bladders (AMOSC)
+ 1 x 25 m^3 Vikoma Frost Barge (AMSA)
+ 10 x 25 m^3 Storage Barge (OSRL)
+ 42 x 4 m^3 ISO Tanks (OEG)

Additional temporary storage capability is also available through existing arrangements as follows;

+ 8 x 10 m^3 Vikoma Flexi Dam (AMSA)
+ 5 x 10 m^3 Canflex Sea Slug (AMSA)
+ 2 x 20 m^3 Covertex Tow Tank (20 m^3)
+ 7 x 50 m^3 Storage Barge (OSRL)
+ 4 x 10 m^3 Waste Containment Tank (OSRL)

- 1 x 10 m^3 Sea Slug (OSRL)
- Liquid waste collection, transport and final disposal of waste received at port through Santos' Waste Service Provider (NWA) (as detailed in **Section 17.5**)

Additional OSRL resources may be available on a case-by-case basis (7 x 50 m^3 Storage Barge, 11 x 25 m^3 Storage Barge, 5 x 10 m^3 Waste Containment Tank, 1 x 10 m^3 Sea Slug)

To ensure availability of appropriate vessels, the Santos Marine Logistics team maintains a number of service arrangements, including the IHS Maritime Portal, MSAs with vessel operators and a service agreement with Clarkson Platou for the provision of offshore market intelligence.

The IHS Maritime Portal allows Santos to access the real time location of any vessel anywhere in the world which is transmitting an AIS signal. Through this portal, Santos can identify vessels in the region via the map function and access details about the basic specifications of the vessel along with the name of the vessel operator. Santos maintains MSAs with a number of vessel operators in Australia (over 10) for the provision of marine services. The MSAs set out the high-level terms and conditions of engagement between the entities and will be used to gain access to additional vessels to support spill response activities. Also, through Clarkson Platou, Santos maintains offshore market intelligence globally with a focus on the south-east Asia region.

The estimated vessel availability for Bedout containment and recovery operations was established in consultation with the Santos Marine Logistics Team. The detailed example list of potential deployment vessels, towing vessels and barges or tankers for waste storage and transfer is provided in **Appendix U**: Containment and Recovery Logistics

. The assessment of appropriate vessel availability for containment and recovery operations indicates that there are currently 27 vessels available in Australia that can be used to support deployment operations, which are covered under existing Santos MSAs. There is availability for approximately 10 more vessels within the region (Singapore) if additional resources are required (not covered under MSA). For towing vessels, 26 vessels are currently available within WA which are covered under existing Santos MSAs.

For a sustained operation, it is necessary for daily transfer of recovered oil onboard containment and recovery deployment vessels to a larger waste storage/transfer vessel, which will be captured by the waste transfer concept of operations procedure. This will be primarily achieved through the use of chartered oil tankers or barges which would act as a temporary offshore waste oil storage facility, before transiting to an approved port for waste transfer. Under the existing MSAs, Santos can gain access to 15 barges and 4 Platform Supply Vessels (PSVs) locally that can be used for temporary waste storage and transfer. Vessel market intelligence from Clarkson Platou also shows availability of approximately 8 to 14 tankers/barges from Singapore if additional resources are required.

Santos maintains close relationships with vessel contractors to remain appraised of the location and availability of vessels in the region. Vessel contractors provide regular updates to Santos on the locations and availability of vessels within their fleets during Quarterly Review Meetings (QRM). Additionally, Santos is able to call upon the contractors at any time to request availability of vessels to support Santos marine logistics requirements.

11.5 Decanting

Decanting is an important tool needed to make efficient use of waste management resources which are often a limiting factor in containment and recovery.

The reduction of overall waste in some circumstances can create an environmental benefit which outweighs the minimal impact caused by the release of water with very low concentrations of oil.

The *Pollution of Waters by Oils and Noxious Substances (POWBONS) Act 1986*; section 8 allows for decanting for combating specific pollution incidents. Additionally, Annex 1 of MARPOL (Regulation 9) allows for decanting for combating specific pollution events to minimise the damage from pollution. Under both MARPOL and POWBONS decanting must be approved by the relevant Jurisdictional Authority. In WA State waters this is DoT (as the Hazard Management Agency under the *Emergency Management Act* 2005) and in Commonwealth waters this is AMSA. Approval will be sought if decanting is required.

If decanting approval is not obtained through AMSA/DoT, the complete collected oil and water will remain in the collection tanks, and all will be treated as collected waste. In this event, the duration of containment and recovery operations may be reduced due to restricted available sullage.

11.6 Environmental performance

Table 11-8 indicates the environmental performance outcomes, controls and performance standards for this response strategy.

Table 11-8: Environmental performance – containment and recovery

Environmental Performance Outcome	Implement containment and recovery tactics to reduce hydrocarbon contact to surface and shoreline priority protection areas		
Response Strategy	**Control Measures**	**Performance Standard**	**Measurement Criteria**
Offshore Containment and Recovery	**Response Preparedness**		
	Access to containment and recovery equipment and personnel through AMOSC, AMSA National Plan, OSRL and TRG	Maintenance of access to containment and recovery equipment and personnel through AMOSC, AMSA National Plan, OSRL and TRG throughout activity as specified in **Table 11-4**	MoU for access to National Plan resources through AMSA
			AMOSC Participating Member Contract
			OSRL Associate Member Contract
			TRG arrangements
	Offshore waste transfer concept of operations (to help maximise waste storage availability for C&R vessels)	Develop waste transfer concept of operations procedure	Waste transfer concept of operations procedure
	Maintenance of MSAs with multiple vessel providers	Santos maintains MSAs with multiple vessel providers	MSAs with multiple vessel providers

Environmental Performance Outcome	Implement containment and recovery tactics to reduce hydrocarbon contact to surface and shoreline priority protection areas		
Response Strategy	**Control Measures**	**Performance Standard**	**Measurement Criteria**
	Offshore containment and recovery vessels	Maintenance of vessel specification for offshore containment and recovery vessels	Vessel specification
	Planning and arrangements to enable fast access to containment and recovery resources	Santos trained personnel and Santos owned equipment to mobilise to the spill site on the first day post spill.	Equipment manifests Training records MSAs with multiple vessel providers
	Response Implementation		
	First strike resources	Minimum first strike resource requirements mobilised in accordance with **Table 11-5**	Incident Log
	Response requirements for extended operations.	Maintain and operate the containment and recovery systems specified in **Table 11-6.**	Incident Log
	Aerial surveillance reports (to direct operations to areas with greatest oil concentration)	Aerial surveillance reports communicated to C&R Team Leaders	Incident Log
	Decanting to free up liquid oil waste container storage)	Application for offshore decanting is made to AMSA (Commonwealth waters) or DoT (State waters). When approved decanting of water occurs back into boomed area.	Incident Log
	Spill response activities selected and reviewed on basis of a Net Environmental Benefit Analysis	Prepare operational NEBA to determine if containment and recovery is likely to result in a net environmental benefit	Incident Log

Environmental Performance Outcome	Implement containment and recovery tactics to reduce hydrocarbon contact to surface and shoreline priority protection areas		
Response Strategy	**Control Measures**	**Performance Standard**	**Measurement Criteria**
		Operational NEBA for containment and recovery is conducted each operational period and considers oil thickness and weather constraints to effectiveness.	IAP/Incident Log

12 Mechanical Dispersion Plan

Table 12-1 provides the environmental performance outcome, initiation criteria and termination criteria for this strategy.

Table 12-1: Mechanical dispersion – environmental performance outcome, initiation criteria and termination criteria

Environmental Performance Outcome	To create mixing for oil and water to enhance natural dispersion	
Initiation criteria	Operational monitoring identifies thin oil patches at sea surface that are not naturally dissipating in sea surface and is posing risks to wildlife and shorelines by remaining on the surface	
Applicable hydrocarbons	**Caley Condensate**	**MDO**
	✓	✓
Termination criteria	+ There is no longer a noticeable reduction of surface oil resulting from the activity, or + NEBA is no longer being achieved, + Unacceptable safety risks associated with gas and VOCs at the sea surface, and + Agreement is reached with Jurisdictional Authorities to terminate the response	

12.1 Overview

This response strategy assists with the natural dispersion process; creating mixing through physical agitation, by using a vessel's propellers and wake, which encourages the oil to break into smaller particle sizes that are more easily biodegraded. The two common activities associated with mechanical dispersion are:

+ manoeuvring a vessel through the slick, using propeller wash and vessel wake to create mixing in the water body
+ spraying water from the fire hose of a vessel and moving the vessel through the water body to create additional mixing and breakup of the slick.

12.2 Implementation guidance

Table 12-2 provides guidance to the IMT on the actions and responsibilities that should be considered when selecting this strategy.

Table 12-3 provides a list of resources that may be used to implement this strategy. The OSC and/or Incident Commander is ultimately responsible for implementing the response, and may therefore determine that some tasks be varied, should not be implemented or be reassigned.

Table 12-2: Implementation guidance – mechanical dispersion

Action		Consideration	Responsibility	Complete
Initial Actions	The Operational NEBA will confirm the suitability and environmental benefit of conducting mechanical dispersion at appropriate locations.	Water depth, sea state, possible impacts to sensitive shorelines and/or wildlife before spill naturally disperses. This activity is to be conducted during daylight hours only and once the safety plan has been developed.	Operations Section Chief Environment Unit Leader Planning Section Chief	❑
	Safety Officer to develop a safety plan for the activity with respect to potentially dangerous gasses and VOCs (including applicable controls).		Operations Section Chief Safety Officer	❑
	Notify vessel-based responders to trial mechanical dispersion.		Operations Section Chief	❑
	Response personnel on vessels to evaluate the effectiveness of the use of mechanical dispersion operations to reduce the volume of oil on the water surface. Communicate the information to the IMT Operations Section Chief for inclusion in Operational NEBA.		Vessel Master/s Santos AMOSC Core Group Responders	❑

Table 12-3: Mechanical dispersion resource capability

Equipment Type/Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
Vessels undertaking other activities	Santos contracted vessel providers	Availability dependent upon Santos and Vessel Contractor activities	Vessels mobilised from Exmouth, Dampier, and NW locations. Locations verified through AIS Vessel Tracking Software.	Varies subject to location/ availability

12.3 Environmental performance

Table 12-4 indicates the environmental performance outcomes, controls and performance standards for this response strategy.

Table 12-4: Environmental performance – mechanical dispersion

Environmental Performance Outcome	To create mixing for oil and water to enhance natural dispersion		
Response Strategy	**Control Measures**	**Performance Standards**	**Measurement Criteria**
Response implementation			
Mechanical Dispersion	Mechanical Dispersion Plan Safety Plan Operational NEBA	Mechanical dispersion is to be conducted during daylight only, once the safety plan has been developed and Operational NEBA confirms suitability and environmental benefit	Incident Log IAP

13 Chemical Dispersant Application Plan

Table 13-1 provides the environmental performance outcome, initiation criteria and termination criteria for this strategy.

Table 13-1: Chemical dispersant application – environmental performance outcome, initiation criteria and termination criteria

Environmental Performance Outcome	Implement dispersant application to enhance biodegradation of hydrocarbons and reduce the impact of surface hydrocarbons on protection priorities	
Initiation criteria	Notification of a Level 2/3 condensate spills	
Applicable hydrocarbons	**Caley Condensate**	**MDO**
	✓	✗
Termination criteria	+ Application of chemical dispersants will cease when dispersant efficacy is no longer providing a net environmental benefit as assessed through the NEBA process, and + Agreement is reached with Jurisdictional Authorities to terminate the response	

13.1 Overview

Surface application of dispersants is considered the primary dispersant application response strategy with SSDI as a secondary strategy for large (Level 2/3) spills of Caley Condensate (see **Section 6.5).** Dispersants are chemicals that are sprayed onto floating oil slicks by vessels and/or aircraft; or injected subsea directly to the source of the spill (e.g. uncontrolled well loss site). Dispersants are designed to separate the oil into small droplets and assist with dispersion in the water column to speed up the process of natural biodegradation. Chemical dispersants can be used to:

+ decrease the concentration and volume of surface oil reaching sensitive receptors
+ increase the rate of natural biodegradation
+ reduce the quantity of waste created.

The operational NEBA process will consider potential impacts of both oil and dispersant on sensitive receptors, taking into account information gained from monitor and evaluate activities. This will inform decisions on dispersant use throughout the response, including application location(s), the volumes and rates at which dispersant is applied, and when to limit or cease dispersant use

13.2 Surface chemical dispersants

Surface chemical dispersants are most effective on hydrocarbons that are at a thickness of 50 to 100 g/m^2 on the sea surface. EMSA (2010) recommends thin layers of spilled hydrocarbons should not be treated with dispersant. This includes BAOACs 1 to 3 (EMSA, 2010) (**Table 13-2**). IPIECA (2015a) recommends that the thickest areas of oil should be targeted for surface dispersant application.

13.2.1 Dispersant application area

The base case for surface dispersant application is that no application is to occur:

- within a Habitat Protection Zone or National Park Zone of an Australian Marine Park (application permitted in the Multiple Use Zone)
- within State Marine Parks
- within State Waters
- within 10 km of water depths <10 m LAT
- within exclusion zones of offshore facilities
- within 25 km or well site[17]

Table 13-2: Bonn Agreement oil agreement appearance codes

Code	Description	Layer Thickness (µm)	Litres per km²
1	Silvery sheen	0.04 to 0.30	40 to 300
2	Rainbow sheen	0.30 to 5.00	300 to 5,000
3	Metallic	5 to 50	5,000 to 50,000
4	Discontinuous true oil colour	50 to 200	50,000 to 200,000
5	Continuous true oil colour	More than 200	More than 200,000

13.2.2 Vessel-based dispersant operations

13.2.2.1 Implementation guidance

Table 13-3 provides guidance to the IMT on the actions and responsibilities that should be considered when selecting this tactic. **Table 13-4** provides a list of resources that may be used to implement this strategy. Mobilisation times for the minimum resources that are required to commence initial aerial dispersant operations are listed in **Table 13-5**. The Incident Commander is ultimately responsible for the response, and may therefore determine that some tasks be varied, should not be implemented or be reassigned.

[17] Santos confirmed during modelling that leaving a 25 km buffer around the LOWC location allows for a significant proportion of Caley Condensate to evaporate (62% within 48 hours under moderate (5m/s) wind conditions) (GHD, 2021b). The 25 km buffer represents the approximate distance that surface oil will travel from the LOWC location under moderate wind conditions within a 48-hour period. This approach allows for response techniques to be more effective on the remaining proportion of hydrocarbons within the marine environment.

Table 13-3: Implementation guidance – vessel dispersant application

	Action	Consideration	Responsibility	Complete
Initial Actions	Confirm operational NEBA supports surface chemical dispersant application.	Oil type suits dispersant application. Surveillance to confirm oil spill thickness supports use of dispersants from vessels (e.g. BAOAC 4 to 5). Liaise with third party providers (e.g. AMOSC) as part of operational NEBA. Evaluate oil spill trajectory modelling when available.	Planning Section Chief Environment Unit Leader	❑
	Source vessel/s for dispersant application and mobilise to nearest port for loading equipment and personnel (Exmouth or Dampier).	Vessel specification for dispersant vessels provided in ER Intranet – First Strike Resources.	Logistics Section Chief	❑
	Mobilise dispersant operations Team Leaders and Team Members (Santos Core Group and/or AMOSC staff/ Industry Core Group) to designated port.	Each vessel undertaking dispersant application (is to be manned with personnel trained in dispersant application (e.g. AMOSC staff, Santos or Industry Core Group member) who is the Team Leader tasked with controlling the operations and implementing in a safe and responsible method. For prolonged dispersant operations, OSRL responders via Singapore may also be used.	Logistics Section Chief	❑
	Mobilise vessel-based dispersant application equipment and dispersant shake test kits from the Santos storage locations in Exmouth (Exmouth Freight & Logistics) or Dampier Supply Base (two systems at each location) to the designated deployment port.	Exmouth Freight & Logistics to assist with local logistics and vessel loading of vessel spray systems and dispersant movement in Exmouth.	Logistics Section Chief	❑
	Mobilise AMOSC (Exmouth)/ AMSA (Karratha) dispersant stock to nominated vessel deployment location Exmouth and/or Dampier ports.	Check up to date dispersant stockpile inventories can be accessed via ER Intranet – First Strike Resources.	Logistics Section Chief	❑

	Action	Consideration	Responsibility	Complete
	Use aerial surveillance to determine priority areas for dispersant application an define operational area for response.	Aerial surveillance reports of oil location and thickness.	Planning Section Chief Operations Section Chief	❑
	Identify safety requirements and controls associated with spraying dispersants and working over oil.		Safety Officer	❑
	First vessel onsite test spray oil – confirm effectiveness.	Effectiveness to be recorded with photos.	Operations Section Chief	❑
	Confirm operational NEBA supports surface chemical dispersant application.	Use forecast modelling, operational monitoring data and dispersant efficacy results in operational NEBA.	Operations Section Chief Environment Unit Leader Planning Section Chief	❑
	If dispersant application is shown to be effective and approved for ongoing use by the Incident Commander, continue vessel operations and defining operational area.	Use real-time or most recent visual surveillance observation data to develop operational zones for vessel dispersant operations. The base case restrictions for dispersant application are – no application: + Within a Habitat Protection Zone or National Park Zone of an Australian Marine Park (application considered in the Multiple Use Zone) + Within State Marine Parks + Within State Waters + Within 10 km of water depths <10 m LAT + Within exclusion zones of offshore facilities + Not within 25 km of well site The above applies unless justified otherwise by the Operational NEBA, noting that no application in	Operations Section Chief Incident Commander Environment Unit Leader Planning Section Chief	❑

Action		Consideration	Responsibility	Complete
		Australian Marine Park (outside multi-use zone) or State waters without relevant authority approval (refer to **Section 5.2.4.1** for the process on obtaining consent for dispersant use in State waters).		
Ongoing Actions	Reassess dispersant use, utilising the NEBA process for each operational period. Cease application if no net environmental benefit.		Operations Section Chief Incident Commander Environment Unit Leader Planning Section Chief	❑
	Continue to mobilise additional chemical dispersant stocks from AMOSC and AMSA.		Logistics Section Chief	❑
	Maintain operational zones and provide updates to Vessel Masters on most suitable locations for application.		Operations Section Chief Environment Unit Leader Planning Section Chief	❑

Table 13-4: Vessel dispersant application – resource capability

Equipment Type/Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
Santos Vessel Dispersant Spray Systems	Santos owned	Two containers (each c/w three systems – dual arm, single arm & Afedo head)	Exmouth (Exmouth Freight & Logistics) Dampier (Toll Supply Yard)	Within 12 hours mobilised to port
AMOSC Vessel Dispersant Spray System	AMOSC	1) Afedo Spray systems 2) Vikospray 3) Boom vane 4) Global Dispersant spray system	1) Broome – 2; Exmouth – 1; Fremantle – 5; Geelong – 3 2) Exmouth – 1; Geelong – 3 3) Fremantle – 1; Geelong – 1 4) Fremantle – 1	Response via duty officer within 15 minutes of first call – AMOSC personnel available within one hour of initial activation call; for equipment mobilisation timeframes refer to **Table 10-12**
AMSA Vessel Dispersant Spray System	AMSA	Ayles Fernie Boat Spray	Darwin – 2; Karratha – 2; Fremantle – 2	Access to National Plan equipment through AMOSC.
Dispersant	AMOSC	Refer to **Table 13-11**		Response via duty officer within 15 minutes of first call – AMOSC personnel available within one hour of initial activation call; for equipment mobilisation timeframes refer to **Table 10-12**
	AMSA	Refer to **Table 13-11**		Access to National Plan equipment through AMOSC.
Dispersant spray system vessels	Santos contracted vessel providers Preference for vessels used in Santos deployment exercises	Varies – check through vessel contractors/ Santos vessel tracking system	Exmouth, Dampier, NW locations	Varies subject to location/ availability

Equipment Type/Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
Personnel (field responders) (Trained field response personnel - surge capacity; details provided in Appendix T)	AMOSC Staff	16	Fremantle – 5 Geelong – 11	Response via duty officer within 15 minutes of first call; timeframe for availability of AMOSC personnel dependent on location of spill and transport to site
	AMOSC Core Group (Santos)	12	Perth/NW Aus. facilities – 10 Port Bonython (South Aus.) – 2	12+ hours
	AMOSC Core Group (Industry)	As per monthly availability (minimum 84)	Office and facility location across Australia	Location -dependent; confirmed at time of activation

Table 13-5: Vessel -based dispersant application – first strike response timeline

Task	Time from IMT call-out
IMT confirms applicability of strategy and begins sourcing vessel dispersant resources for applicable spills	<3 hours
Suitable Dispersant Vessels mobilised to nearest deployment port (Exmouth and/or Dampier)	<12 hours
Santos Offshore Core Group mobilised to deployment port (Exmouth and/or Dampier)	<12 hours
Vessel spray system equipment mobilised to deployment port	<12 hours
Dispersants mobilised to port	<12 hours
Vessel spray operation commenced at spill site (weather/daylight dependent)	<28 hours (weather/daylight dependent)
Minimum Resource Requirements	
+ Suitable dispersant application vessel - refer Santos Offshore ER Intranet for vessel specification + One vessel dispersant spray system + Dispersant (10 m^3) + Two Santos Core Group or Industry Core Group responders + Personal protective equipment	

13.2.3 Aerial dispersant operations

13.2.3.1 Implementation guidance

Table 13-6 provides guidance to the IMT on the actions and responsibilities that should be considered when selecting this strategy. **Table 13-7** provides a list of resources that may be used to implement this strategy. Mobilisation times for the minimum resources that are required to commence initial aerial dispersant operations are listed in **Table 13-8**. The Incident Commander is ultimately responsible for implementing the response, and may therefore determine that some tasks be varied, should not be implemented or be reassigned.

Table 13-6: Implementation guidance – aerial dispersant application

Action		Consideration	Responsibility	Complete
Initial Actions	Confirm operational NEBA supports surface chemical dispersant application.	Oil type suits dispersant application. Surveillance to confirm oil spill thickness supports use of dispersants (e.g. BAOAC 4 to 5). Liaise with third party providers (e.g. AMOSC) as part of operational NEBA. Evaluate oil spill trajectory modelling when available.	Planning Section Chief Environment Unit Leader	❑
	Mobilise initial resources for aerial application. After initial AMOSC notifications are complete, contact AMOSC Duty Officer and confirm requirements for the following resources: + Access to and mobilisation of required AMOSC dispersant stocks and associated equipment into Exmouth (AMOSC will arrange through their contracted transport provider). + Activation of the Fixed Wing Aerial Dispersant Capability (FWADC) (AMOSC will activate this on behalf of Santos). + Provision of trained spill responders to support operations (AMOSC Staff and Core Group).	Refer Joint Standard Operating Procedures for FWADC. AMOSC will deploy appropriate aircraft to a designated airstrip close to the spill location (e.g. Port Hedland, Broome, Dampier, Learmonth or Exmouth Airports), and arrange for pilots, Air-Attack Supervisors, observation aircraft (one per two attack aircraft) and trained observers.	Logistics Section Chief Operations Section Chief Aviation Superintendent	❑
	Finalise Fixed Wing Air Operations Plan and Air Operations Plan in consultation with AMOSC, AMSA, Aerotech First Response and other stakeholders and AMSA.	Ensure flight schedule in Air Operations Plan considers requirements for other activities such as aerial surveillance sorties.	Operations Section Chief Aviation Superintendent Planning Section Chief	❑

Action		Consideration	Responsibility	Complete
	Using real-time or most recent visual surveillance observation data, develop operational zones for aerial dispersant operations.	Focus on applying dispersant to areas of slick that threaten priority receptors and are of a sufficient thickness whereby chemical dispersants will be effective. The base case restrictions for dispersant application are – no application: + within a Habitat Protection Zone or National Park Zone of an Australian Marine Park (application considered in the Multiple Use Zone) + within State Marine Parks + within State Waters + within 10 km of water depths <10 m LAT + within exclusion zones of offshore facilities + not within 25 km of well site. The above applies unless justified otherwise by the Operational NEBA, noting that no application in Australian Marine Park (outside Multi-use zone) or State waters without relevant authority approval (refer to **Section 5.2.4.1** for the process on obtaining consent for dispersant use in State waters).	Operations Section Chief Planning Section Chief	❑
	Conduct aerial dispersant spraying reporting effectiveness to IMT.		Operations Section Chief Planning Section Chief	❑
Ongoing Actions	Conduct operational NEBA during each operational period to reassess effectiveness of application rates and dispersant efficacy.		Environment Unit Leader Planning Section Chief	❑

Action		Consideration	Responsibility	Complete
	Maintain operational zones and provide updates to pilots on most suitable locations for aerial application.		Operations Section Chief Planning Section Chief	❑

Table 13-7: Aerial chemical dispersants application – resource capability

Equipment Type/Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
Aerotech First Response fixed wing aircraft, pilots and ground crew (Trained field response personnel - surge capacity; details provided in **Appendix T**: Cumulative Response Capability Assessment)	AMOSC - Fixed Wing Aerial Dispersant Contract	Six under FWADC contract Additional aircraft potentially available through Aerotech First Response	Operations from Learmonth or Onslow airbase Aircraft initially mobilised from six bases around Australia: + Jandakot (WA) + Batchelor (NT) + Parafield (SA) + Scone (NSW) + Ballarat (Vic) + Emerald (QLD)	Six air contractors to have wheels up in four hours from locations around Australia. Mobilisation times depend on the flight time from the location of the aircraft Supporting equipment mobilisation (dispersants etc) as per equip mob timeframes (**Table 10-12**)
Hercules C130 aircraft (Trained field response personnel - surge capacity; details provided in **Appendix T**: Cumulative Response Capability Assessment)	OSRL	One plane	Senai, Malaysia	Wheels up in six hours Flight time from Senai to Port Hedland is eight hours (including one technical stop at Bali/Makassar)
Air attack (and SAR) helicopter	Santos contracted helicopter provider/s	Two (contracted) + additional subject to availability	Karratha (primary base) Learmonth Onslow	Wheels up within one hour for Emergency Response

Dispersant	AMOSC	Refer to **Table 13-11**		Response via duty officer within 15 minutes of first call – AMOSC personnel available within one hour of initial activation call; for equipment mobilisation timeframes refer to **Table 10-12**
	AMSA	Refer to **Table 13-11**		Access to National Plan equipment through AMOSC
FWADC operational personnel incl. Air Attack Supervisor and Dispersant Coordinator	AMOSC and subcontractors via Fixed Wing Aerial Dispersant Contract	Eight AMOSC staff + contractors	AMOSC Fremantle – 5 AMOSC Geelong – 11	Response via duty officer within 15 minutes of first call; timeframe for availability of AMOSC personnel dependent on location of spill and transport to site
SAR vessel (can be double use vessel)	Santos contracted vessel providers.	Varies – check through vessel contractors/ Santos vessel tracking system	Exmouth, Dampier, NW locations	Varies subject to location/ availability

Table 13-8: Aerial dispersant operations – first strike response timeline

Task	Time from IMT call-out
IMT confirms applicability of strategy and activates Fixed Wing Aerial Dispersant Capability (FWADC)	<3 hours
AMOSC to mobilise Fixed Wing aircraft to nominated airbase	<12 hours
AMOSC to mobilise dispersants to nominated airbase	<24 hours
AMOSC to mobilise all FWADC capability personnel to nominated airbase	<48 hours
AMOSC/Santos to mobilise helicopter to nominated airbase to support air-attack surveillance	<48 hours
AMOSC/Santos to mobilise vessel to nominated port to provide SAR support	<48 hours
First FWADC test spray	<48 hours (weather/daylight dependent)
Minimum Resource Requirements	
+ one fixed wing aircraft (Aerotech First Response) + one helicopter + SAR Vessel + WA AMOSC dispersant stocks to deployment airbase (refer to **Table 13-11**) + AMOSC contracted FWADC capability personnel: – Pilots – Air Attack Supervisor – Aerial Observer – Airbase Manager – Dispersant Coordinator – Dispersant Loading Crew	

13.3 Subsea dispersant injection operations

SSDI has been observed to break-up oil droplets forcing greater entrainment of the oil into the water column below the sea surface (Adams *et al.*, 2013). SSDI has additional benefits over surface dispersant application including its ability to reduce volatile organic compounds in the vicinity of a spill, making the area safer for responders. It typically requires smaller volumes of dispersant to be used as it has a higher encounter rate with the hydrocarbons than surface application. SSDI can also be used day and night; whereas surface application via vessel or aircraft can only occur during daylight hours.

The effectiveness of SSDI is influenced by dispersant efficacy on the hydrocarbon, how close to the release the dispersants may be added and the dispersant to oil ratio (DOR). It is assumed the DOR would commence at 1:100 and would be modified based on the results of the effectiveness monitoring. Research conducted by Brandvik et al., 2014 indicated that DORs of 1:50 to 1:100 may be sufficient to cause substantial additional dispersion, particularly if the dispersant is injected close to or into the release point.

However, for the worst-case exploration subsea LOWC scenarios associated with Bedout Multi-Well Drilling activities, the high exit velocity of subsea plumes results in small, entrained oil droplets that are not materially affected by SSDI application (further detail in **Section 6.4.1**). As such, surface dispersant application, which can be mobilised more rapidly and has a material effect in reducing oil loads is considered to be the primary strategy for applying dispersants (further detail in **Section 6.4.1**).

13.3.1 Implementation guidance

Table 13-9 provides guidance to the IMT on the actions and responsibilities that should be considered when selecting this strategy. Mobilisation times for the minimum resources that are required to commence initial SSDI operations are listed in **Table 13-10**. The Incident Commander is ultimately responsible for implementing the response, and may therefore determine that some tasks be varied, should not be implemented or be reassigned.

Table 13-9: Implementation guidance – subsea dispersant injection

Action		Consideration	Responsibility	Complete
Initial Actions	Confirm operational NEBA supports subsea chemical dispersant injection.	As described in **Section 6.5,** subsea dispersant application has been identified as secondary strategy for subsea LOWC scenarios only. The operational NEBA will identify if this strategy is activated. Use forecast modelling and any operational monitoring results in operational NEBA.	Operations Section Chief Incident Commander Environment Unit Leader Planning Section Chief	❑
	If viable and if the Operational NEBA supports SSDI, activate Subsea First Response Toolkit (SFRT) equipment and activate Oceaneering personnel for deployment.	As described in **Section 6.5,** SSDI is considered a secondary response strategy. The high exit velocity of subsea plumes results in small, entrained droplets that are not materially affected by the subsea application of chemical dispersants indicates minimal environmental benefit from SSDI (**Section 6.7).** Separate contracts in place for SFRT (AMOSC) and Oceaneering.	Designated call-out authority (Incident Commander) Source Control Branch	❑
	Refer to **Section 9.2.4** for implementation guidance associated with the SFRT.			
	If viable, conduct initial ROV survey at the release point to determine the nature of the release, behaviour of the oil, estimate the oil and gas flow rates and determine DOR for injection.	Information to be used to help determine injection method/s.	Operations Section Chief Source Control Branch Director	❑
	If viable, commence dispersant subsea injection adjusting DOR based on real-time monitoring.		Operations Section Chief Source Control Branch Director	❑
	Continue operational monitoring (including operational water quality monitoring and surveillance) near the release point to help determine dispersant effectiveness.	Use guidance provided in API Technical Report 1152 (API, 2013) to determine dispersant efficacy. Surveillance should have commenced prior to any dispersant being added to the release so that changes	Source Control Branch Director Operations Section Chief	❑

	Action	Consideration	Responsibility	Complete
		and efficacy can be determined. Once baseline data has been collated, commence injection to help determine DOR and modify accordingly.		
	If dispersant application is shown to be effective and approved by the Incident Commander, continue operations.		Source Control Branch Director Operations Section Chief Incident Commander	❑
Ongoing Actions	Reassess dispersant use, utilising the NEBA process for each operational period. Cease application if no net environmental benefit.	Continue to use forecast modelling, operational monitoring data and dispersant efficacy results in operational NEBA.	Source Control Team Leader Operations Team Leader Incident Commander Planning Team Leader Environmental Team Leader	❑

Table 13-10: Subsea dispersant injection – first strike response timeline

Task	Time from IMT call-out
IMT Source Control Branch activated	<24 hours
If viable response strategy, suitable SFRT-dispersant injection vessel/s mobilised to Dampier	<10 days
If viable response strategy, Oceaneering to mobilise personnel to Dampier/Broome	<10 days
If viable response strategy, AMOSC to mobilise SFRT and dedicated dispersant to Dampier	<10 days
If viable response strategy, load equipment, steam to site and commence SSDI	<12 days
Minimum Resource Requirements	
+ Suitable vessel and crew + SFRT + Dispersant (with SFRT) + Oceaneering personnel	

13.4 Dispersant selection Process

13.4.1 Dispersant Use

Dispersants should only be used when the risks associated with their use to the environment as a whole have been analysed, and it has been determined that there would be a net environmental benefit from their use. The type of dispersant that will be effective is influenced by the oil type and metocean conditions (Hook and Lee, 2015).

Most of the knowledge on the biological impacts of dispersants has been developed via laboratory experiments (Quigg *et al*., 2021) rather than from in-situ use. This is also the case for those dispersants listed as approved in the National Plan for Maritime Environmental Emergencies Register of Oil Spill Control Agents (OSCA). Before a dispersant can be considered for use by AMSA, its toxicological impact must be tested on a diverse range of aquatic taxa, including algae, invertebrates and fish (Hook and Lee, 2015). This screening process ensures that these compounds have comparatively low toxicity (according to US Environmental Protection Agency criteria; Hemmer *et al*., 2011) and that they are much less toxic than oil (Hook and Lee, 2015).

Of the dispersants listed on the OSCA Register, only Corexit 9500A and 9527 (the latter is only on the transitional acceptance list) have been used in response to a large-scale spill and during subsea application, which was during the Macondo oil spill (Gulf of Mexico) in 2010. Six types of dispersant were used on the Montara oil spill in the Timor Sea in 2009, including Slickgone NS, Corexit 9500, Corexit 9527, Slickgone LTSW, Ardrox 6120 and Tergo R40 (AMSA, 2010). However, the total volumes sprayed equated to 150 m^3 (AMSA, 2010), as opposed to the 7,000 m^3 (4,100 m^3 surface application and 2,900 m^3 subsea application of just Corexit 9500A and 9527) (Quigg *et al*. 2021) used during the Macondo spill.

A detailed assessment of oil fate and mass balance was completed by French-McCay *et al*. (2021) on the Macondo spill. This indicated on average, that there was 9% less floating oil during the duration of the release due to subsea dispersant application. This assessment also showed subsea application was increasingly effective over the course of the spill in reducing VOC exposures in the immediate area of the wellhead by up to 27% (French-McCay *et al*. 2021), making source control operations safer for responders.

However, water depth may be a limitation to the effectiveness of SSDI for VOC control; shallower depths may not be sufficient to enable VOCs to be reduced to a point which ensures a safe operating environment on the surface (OSRL, 2017). Some research suggests this may be around 500 metres (Adams & Socolofsky, 2005, in: IPIECA, 2015) however there is currently no definitive recommended minimum water depth for SSDI use. Water depth at the well site is 72 m (Apus-1) and 83 m (Pavo-1), compared to 1,500 m where SSDI was used during the Macondo spill.

Despite the considerable amount of research, modelling and experimental work done to study the effects of subsea dispersant application, there is conflicting evidence as to the efficacy of the use of subsea dispersants (Quigg *et al*., 2021). However, NASEM (2020) found no compelling evidence that at low to moderate oil concentrations that chemically dispersed oil was any more toxic than oil alone. However, at high concentrations the combination of oil and dispersant appeared more toxic (Quigg *et al*., 2021), suggesting caution should be applied when considering dispersant application rates and volumes. This also shows the importance of ongoing dispersant effectiveness monitoring (**Section 10**) and its application through the operational NEBA process.

13.4.2 Dispersant selection

Chemical dispersants listed as approved in the National Plan for Maritime Environmental Emergencies Register of Oil Spill Control Agents (OSCA) are to be prioritised for use. OSCA listed dispersants are readily available to Santos through AMOSC, OSRL and AMSA. These include Slickgone NS, Slickgone EW, Corexit EC9500A, Corexit 9527 (transitional acceptance) and Finasol 52. There are sufficient stockpiles of these dispersants in Australia to service the first few days of application. During this time additional stockpiles of OSCA listed dispersants can be mobilised to Port Hedland from the Global Dispersant Stockpile to help support the continued application. In addition, dispersant manufacture will commence immediately, as described in **Section 13.5**.

If dispersant types additional to those on the Register of OSCA are required, Santos will use its Offshore Division Operations Chemical Selection, Evaluation and Approval Procedure (EA-91-II-10001) prior to application. FINASOL OSR 52 has been pre-assessed as low risk using the Santos Offshore Division Operations Chemical Selection, Evaluation and Approval Procedure (EA-91-II-10001) and are therefore designated as acceptable for use.

The Santos Offshore Division Operations Chemical Selection, Evaluation and Approval Procedure requires the dispersant to be risk assessed and deemed environmentally acceptable. The criteria used for environmental acceptability includes aquatic toxicity, biodegradation and bioaccumulation potential data.

Where sufficient data is available, the chemical is risk assessed using the Offshore Chemical Notification Scheme (OCNS) Chemical Hazard and Risk Management (CHARM) or non-CHARM models depending on the model's applicability criteria. Chemicals that meet the selection criteria belonging to CHARM Colour-band Gold or Silver, or non-CHARM groups D or E are considered environmentally acceptable. According to the OCNS CHARM model, GOLD ranked chemicals have a maximum Hazard Quotient (HQ) of <1 and Silver, HQ ≥1 and <30. According to the OCNS non-CHARM model guidelines, the worst-case initial OCNS grouping would be group B based on aquatic toxicity data of LC50 or EC50 > 1 to 10 ppm. To obtain a final OCNS grouping of D, the chemical would need to be readily biodegradable (>60% biodegradation in 28 days) and nonbioaccumulative (Log Pow <3 or BCF ≤100 and molecular weight ≥ 700). The best case initial OCNS grouping would be group E based on aquatic toxicity data of LC50/EC50 > 1000 ppm. The best case final OCNS grouping would remain E with the chemical readily biodegradable and non-bio accumulative.

If the chemical cannot be rated using the method described above, it would be assigned a pseudo OCNS CHARM or non-CHARM group ranking. Where there is insufficient ecotoxicity data available to either rate the chemical or assign a pseudo ranking, robust justification demonstrating its environmental acceptability shall be provided, based on volume/concentration, receiving marine environment characteristics and ecotoxicity data (aquatic toxicity, biodegradability and/or bioaccumulation data where applicable; i.e., biodegradation and bioaccumulation potential are not applicable to inorganic substances).

During a response, chemical dispersant shall be tested on the released oil at a laboratory as part of the initial oil characterisation (refer **Section 10.6**) as well as through field testing using vessel-based spray systems/ dispersant shake test kits. The DBCA ESC can also advise on the location of AMSA National Plan Dispersant Effectiveness Test Kits, which could be utilised in addition to Santos' dispersant efficacy testing resources.

13.5 Dispersant effectiveness monitoring

To assess the effectiveness of dispersant application, Santos will use the SMART monitoring protocol (NOAA, 2006) to measure the efficacy of surface dispersants and the Industry Recommended Subsea Dispersant Monitoring Plan (API, 2020) to determine the efficacy of subsea dispersant application. These techniques assist in characterising the nature and extent of subsea or near surface dispersed oil, aid in the validation and accuracy of plume trajectory models and allow for rapid quantification of data to enable the IMT to make decisions about continuation of dispersant application. The IMT assesses the effectiveness of continued dispersant use against an operational NEBA assessment.

The SMART protocol for surface dispersants allows for the acquisition of more robust data using fluorometry. This protocol includes the following tiers (which may be conducted at the same time):

+ **Tier I: Visual Monitoring** – requires the use of trained or experienced personnel to conduct visual monitoring of dispersant efficacy after a dispersant has been applied to the spill *in-situ*. This monitoring is usually performed after the shake jar test. If the shake jar test shows the dispersant to be effective, then a 'test spray' is performed and observed using this protocol, before full-scale deployment of dispersant spraying occurs. Tier I gives rapid (but qualitative) results and is used as the initial monitoring method until additional resources and equipment are deployed to conduct Tier II and III monitoring. It should be noted that visual monitoring does not provide any details on particle sizes (required to understand the stability of the suspension) nor does it indicate the overall loadings of oils into the water column (an indicator of both efficacy and the likelihood of toxic impacts). Visual observations may be taken by vessel and/or aircraft and will be used to assess whether dispersant application is successful in dispersing hydrocarbons. The effectiveness of the aerial based chemical dispersion strategy is communicated to the Operations Section Chief via the Air-Attack Supervisors. As per industry standard practice, initial dispersant use decision making for surface application (Day 1 – Day 4) will be supported using these visual monitoring techniques and thereafter on-water monitoring techniques, such as fluorometry will be deployed.
+ **Tiers II and III: On-water monitoring** – requires the use of trained or experienced personnel to conduct on-water monitoring using CTD meter, fluorometer and water quality samples (collected as per operational water quality monitoring (**Section 10.7**)).

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Subsea dispersant injection monitoring includes the following phases:

+ **Phase 1:** Confirmation of dispersant effectiveness near the discharge point and reduction in surface VOCs. This is conducted visually via ROVs and aerial imaging; and via VOC monitoring.
+ **Phase 2:** Characterisation of oil droplet size near plume and dispersed oil concentrations at depth in the water column. This is conducted using a particle size analyser close to the release site and water column monitoring (as per operational water quality monitoring (**Section 10.7**)).
+ **Phase 3:** Detailed chemical characterisation of water samples. This involves characterisation of collected water samples using accredited contract laboratories. The transfer and shipping would be handled using the logistical pathways utilised for operational water quality monitoring (**Section 10.7**).

SSDI application is considered a secondary strategy to surface dispersant application (refer to **Section 6**). and is primarily included to attempt reduction of VOC exposure to response personnel working close to the well site. SSDI would be considered where VOC levels in the vicinity of the wellsite are shown through monitoring to be unacceptable.

Prior to any application of subsea dispersants, an initial ROV survey would be conducted at the release point to determine the nature of the release. This information will inform an assessment of the feasibility of subsea chemical dispersion, initial choice of dispersant injection methods (e.g., number of nozzles, nozzle sizes) and DOR. In addition, as per Industry Recommended Subsea Dispersant Monitoring Plan (API, 2020), subsea dispersant effectiveness monitoring should commence prior to the application of any dispersant, to ensure baseline data is captured.

13.6 Surface dispersant supply and logistics requirements

Deterministic oil spill modelling has been conducted to assess the effect of dispersants on the worst-case spill scenarios (Caley Condensate) associated with Bedout Multi-Well Drilling activities (**Section 6.4.1**).

13.6.1 Worst case credible scenario requirements – Apus-1 (Surface LOWC)

Based on the deterministic dispersant application modelling for the surface LOWC scenario a total of 10, 866 m^3 of dispersant was applied via 8 FWADC, 1 Hercules C130 aircraft, and 8 vessels over 77 days of application.

For dispersant planning purposes, required dispersant volumes have been calculated based on the release rate and a required worst-case dispersant application ratio of 1:25. This results in a dispersant demand of 185 m^3 per day on day 1 and 176 m^3 per day on day 77, with a total dispersant demand of 13,813 m^3 over the life of the LOWC incident. A dispersant budget has been prepared (**Appendix S**: Dispersant Supply and Logistics Plan Summaries) considering the daily/weekly application requirements, daily volume of dispersant arriving in Port Hedland and balance on hand after each day. This amount is higher than the modelled amount as the dispersant model accounts for the simulated behaviour of the vessels and aircraft within the OSCAR model, which have reduced ability to apply dispersants compared to the idealised dispersant plan scenario. This is mainly because there isn't always oil available for treatment that satisfies the oil thickness criteria.

It should be noted that the dispersant planning process has a number of limitations. Firstly, it assumes all oil can be treated by surface dispersant application. In reality, it is not possible to treat all the released oil, as surface dispersant application efforts will target the thickest areas of the slick in an identified area for optimum application, avoiding thinner iridescent sheen areas (IPIECA, 2015d).

Secondly, the minimum dosage of dispersant will be applied to successfully disperse the oil. The dispersant plan has assumed the recommended dosage rate of 1:25 (IPIECA, 2015d). In reality, a range of dosages will be applied during test sprays to determine the minimum dosage required to achieve successful dispersion in order to minimise potential toxicity effects and waste of dispersant stocks. The optimum minimum dosage will be unique to the spill situation and can only be determined for each particular spill through in-field monitoring, however dosages of 1:40 have been shown to be effective (Ross, 2011).

Finally, operational constraints will affect the surface response, including the challenges of directing a successful dispersant spray swath at a moving target, meteorological and metocean conditions, hours of daylight, fuel consumption and ranges, and other logistical challenges such as aircraft and vessel mechanical issues and/or downtime.

13.6.2 Dispersant supply and logistics

Supply stocks sufficient to cover dispersant requirements for the first 35 days of the spill are shown in **Appendix S**: Dispersant Supply and Logistics Plan Summaries. Santos has a dispersant supply and logistics plan that ensures dispersant requirements can be met for the duration of the worst-case LOWC scenario. Dispersant stockpiles are made available via AMOSC membership or AMSA MoU with most supplies within Australia being available within 48 to 55 hours. Santos can supply all required road logistics to meet these timeframes through its contracted logistics provider. Santos can also provide air logistics for all other stockpiles throughout Australia and internationally.

Due to the significant volume of dispersant required over the 77-day application period, dispersant stocks would have to be imported from international stockpiles. Additionally, response specific manufacturing would be required in order to meet demand, with manufactured dispersant stocks required to be on site towards the end of week five of the response, further detailed in **Appendix S**: Dispersant Supply and Logistics Plan Summaries. To achieve this, dispersant manufacturers would require early notification that dispersant manufacture is required.

Dispersant availability is checked bi-annually against Santos' worst-case requirements across all operational, project and drilling activities.

Table 13-11: Dispersant supply stock locations and volumes

Source	Stock Location	Volume (m^3)	Type	Total Volume (m^3)
AMSA	Adelaide	10	Slick Gone EW	355
		10	Slick Gone NS	
	Brisbane	10	Slick Gone EW	
		10	Slick Gone NS	
	Townsville	10	Slick Gone EW	
		15	Slick Gone NS	
	Karratha	10	Slick Gone EW	
		10	Slick Gone NS	
	Darwin	10	Slick Gone EW	
		10	Slick Gone NS	
	Devonport	10	Slick Gone EW	
		10	Slick Gone NS	

Source	Stock Location	Volume (m³)	Type	Total Volume (m³)
	Fremantle	48	Slick Gone NS	
		52	Slick Gone EW	
	Horne Island	10	Slick Gone NS	
	Melbourne	10	Slick Gone EW	
		10	Slick Gone NS	
	Sydney	45	Slick Gone NS	
		55	Slick Gone EW	
AMOSC	Exmouth	75	Slick Gone NS	497 (surface) 747 (subsea)
	Fremantle	8	Slick Gone NS	
		27	Corexit 9500	
		500 (SFRT stockpile* 50%)	Slick Gone NS	
	Geelong	75	Slick Gone NS	
		62	Corexit 9500	
OSRL (Santos has access up to 50% of SLA stockpile)	Various (Singapore, UK, France, Bahrain, USA)	779 (50% = 389)	Slick Gone NS Slick Gone EW Slickgone LTSW Finasol OSR 52 Corexit 9500 Corexit 9527	389
Total				1,241 (surface) 1,491 (subsea)
OSRL Global Dispersant Stockpile (GDS)	Various (Singapore, UK, France, South Africa, USA, Brazil)	5,000	Slick Gone NS Finasol OSR 52 Corexit 9500	5,000
Total (including additional OSRL 50% SLA and GDS stocks)				6,241 (surface) 6,491 (subsea)

* As per the AMOSPlan, there is a provision made by the SFRT Steering Committee to provide up to 250m³ of dispersant into a surface spill response, given certain provisions are met in the first instance by AMOSC (AMOSC, 2021).

13.7 Subsea dispersant injection logistics requirements

If a subsea LOWC was to occur, the site would require a detailed assessment to determine the most suitable intervention methods for the incident. This may be achieved through the use of ROVs (supplied by Santos) and the Subsea First Response Toolkit (refer to **Section 9**), which is stationed in Fremantle and Jandakot and managed by AMOSC. The SFRT includes debris clearance equipment and subsea dispersant equipment, including a dedicated dispersant stockpile (500 m^3 of Dasic Slickgone NS) and ancillary equipment (e.g., pumps, flying leads, coiled tubing head, dispersant wands). Santos can access a suitable vessel for transportation of the subsea dispersant injection system, dispersants and ancillary equipment including ROVs through its contracted vessel providers.

The volumes of dispersant required will depend on the DOR used at the injection point. It has been assumed that the release would require a DOR of 1:100. To achieve a DOR of 1:100 that IPIECA-IOGP (2015a) recommend for a flow rate of 20,000 bbl./day, a dispersant pump rate of 22 L/min is required. Scaling this dispersant application rate up in line with the credible flow rate (from day 9 when SSDI is expected to commence) for the Apus-1 LOWC scenario (147,517 bbl/day) results in a required dispersant pump rate of 160 L/min (230 m^3/day). This required rate declines over time as the reservoir depletes, as shown in **Appendix S**: Dispersant Supply and Logistics Plan SummariesAppendix S: Dispersant Supply and Logistics Plan Summaries**.**

The AMOSC SFRT Package can deliver up to 110 L/min (158 m^3/day), therefore, to meet the SSDI demand, a second SSDI package would need to be deployed via Santos' contract with WWC. This SSDI package is based in Singapore, would arrive onsite by day 15, commencing application day 15 to 16. Two separate dispersant supply vessels would be sent to the field to support each SSDI system. These vessels would be sourced from Santos' existing vessel contractual arrangements.

A dispersant supply and logistics plan has been prepared (**Appendix S**: Dispersant Supply and Logistics Plan SummariesAppendix S: Dispersant Supply and Logistics Plan Summaries) considering the daily / weekly application requirements, daily volume of dispersant arriving in Port Hedland and balance on hand after each day. The dispersant budget is based on the dispersant available globally as per **Table 13-11**, noting that full surface dispersant application will not occur if SSDI is selected, and that the full SFRT dispersant stock of 500 m^3 will be available. The total dispersant demand for subsea application is 15,149 m^3, noting partial application (via AMOSC SFRT package) will commence on day 9 and full application (via AMOSC SFRT package and WWC SSDI Package) will commence by day 15 to 16. Additionally, response specific manufacturing would be required in order to meet demand, with manufactured dispersant stocks required to be on site towards the end of week six of the response, further detailed in **Appendix S**: Dispersant Supply and Logistics Plan SummariesAppendix S: Dispersant Supply and Logistics Plan Summaries. To achieve this, dispersant manufacturers would require early notification that dispersant manufacture is required.

13.8 Environmental performance

Table 13-12 indicates the environmental performance outcomes, controls and performance standards for this response strategy.

Table 13-12: Environmental performance –dispersant application

Environmental Performance Outcome	Implement chemical dispersant application to enhance biodegradation of hydrocarbons and reduce the impact of surface hydrocarbons on protection priorities.		
Response Strategy	**Control Measures**	**Performance Standard**	**Measurement Criteria**
Chemical Dispersant Application – surface	**Response Preparedness**		
	Arrangements to enable access to dispersants, equipment and personnel	Maintenance of access to dispersant, application equipment and personnel through AMOSC, AMSA National Plan, OSRL and TRG throughout activity as specified in **Table 13-4** and **Table 13-7.**	MoU for access to National Plan resources through AMSA
			AMOSC Participating Member Contract
			OSRL Associate Member Contract and Global Dispersant Supply Supplementary Agreement
			TRG arrangements
	Maintenance of MSAs with multiple vessel providers	Santos maintains MSAs with multiple vessel providers	MSAs with multiple vessel providers
	Dispersant application vessels	Maintenance of vessel specification for dispersant application vessels	Vessel specification
	Response Implementation		
	Mobilisation of minimum resource requirements for initial response operations	Minimum requirements mobilised in accordance with **Table 13-5** and **Table 13-8.**	Incident log
	Response requirements for extended operations.	Santos will maintain access to ongoing dispersant and equipment to achieve the testing arrangements plan in **Appendix K: Testing Arrangements Plan**	Incident log
	Chemical Dispersant Application Plan	Only chemical dispersants that are listed as approved on the National Plan Oil Spill Control Agent (OSCA) list or are evaluated as acceptable as per the Operations Chemical Selection, Evaluation and Approval Procedure (EA-91-II-10001) are to be used	Incident Log
		Santos will have access to dispersants specified in **Table 13-11.**	Incident Log

Environmental Performance Outcome	Implement chemical dispersant application to enhance biodegradation of hydrocarbons and reduce the impact of surface hydrocarbons on protection priorities.		
Response Strategy	**Control Measures**	**Performance Standard**	**Measurement Criteria**
		Santos will conduct surface dispersant efficacy monitoring in accordance with SMART Monitoring Protocol (NOAA, 2006)	Incident Log
		Analysis of dispersant amenability provided to IMT within 24 hours of oil delivery to Laboratory	Incident Log
		If dispersant application is approved by the Incident Commander, request OSRL to initiate dispersant manufacture in week 1 to ensure a build-up of supply.	Incident Log
		If amenable to surface dispersants, and required oil volume can be collected, oil and dispersant samples to be sent immediately for laboratory ecotoxicity testing of oil and chemically dispersed oil	Incident Log
		If dispersant application is approved by the Incident Commander for aerial application, a test spray run via the National Plan Fixed Wing Aerial Dispersant Contract will be conducted to assess dispersant effectiveness	Incident Log IAP
		If dispersant application is approved by the Incident Commander for vessel application, a test spray will be conducted to assess dispersant effectiveness	Incident Log IAP

Environmental Performance Outcome	Implement chemical dispersant application to enhance biodegradation of hydrocarbons and reduce the impact of surface hydrocarbons on protection priorities.		
Response Strategy	**Control Measures**	**Performance Standard**	**Measurement Criteria**
		Prepare operational NEBA to determine if chemical dispersant application is likely to result in a net environmental benefit. NEBA will consider: + forecast spill modelling of oil comparing simulations with and without effect of chemical dispersants + laboratory dispersant efficacy testing results + operational monitoring results (surveillance and shoreline assessment) showing distribution of floating, stranded oil and location of sensitive fauna and habitats + operational water quality monitoring results showing distribution and concentration of subsea oil (once available) + scientific monitoring water sampling results (SMP1) (once available) + consultation with Control Agency and/or key stakeholders	Incident Log IAP
		NEBA undertaken each operational period by the relevant Control Agency to determine if response strategy is continuing to have a net environmental benefit. NEBA included in development of following period Incident Action Plan	IAP Incident Log
		Surface Dispersant Application Area will be defined as part of the IAP. The base case for dispersant application is that no dispersants to be applied: + within a Habitat Protection Zone or National Park Zone of an Australian Marine Park (application permitted in the Multiple Use Zone) + within State Marine Parks + within State Waters + within 10 km of water depths <10 m LAT + within exclusion zones of offshore facilities + within 25 km of well site	IAP

Environmental Performance Outcome	Implement chemical dispersant application to enhance biodegradation of hydrocarbons and reduce the impact of surface hydrocarbons on protection priorities.		
Response Strategy	**Control Measures**	**Performance Standard**	**Measurement Criteria**
		Surface dispersant will only be applied in the Dispersant Application Area and target oil above BAOAC 4 and 5	IAP Incident Log
Chemical Dispersant application – subsea	**Response Preparedness**		
	Arrangements to enable access to dispersants, equipment and personnel	Maintenance of access to dispersant, application equipment and personnel through AMOSC, AMSA National Plan and OSRL throughout activity	MoU for access to National Plan resources through AMSA
			AMOSC Participating Member Contract
			AMOSC SFRT Participant
			OTA Agreement with Oceaneering
			OSRL Associate Member Contract and Global Dispersant Supply Supplementary Agreement
	Arrangements in place to monitor availability of vessels capable of transporting SFRT	Vessel availability shall be monitored regularly via Santos' contracted vessel broker	Shipbroker reports
	Maintenance of MSAs with multiple vessel providers	Santos maintains MSAs with multiple vessel providers	MSAs with multiple vessel providers
	Arrangements to enable fast access to subsea application platform and dispersant supply	SFRT and dedicated dispersant stockpile mobilised to site within 9 days	AMOSC SFRT Participant OTA Agreement with Oceaneering Source Control Planning and Response Guideline
	Chemical Dispersant Application Plan	Only chemical dispersants that are listed as approved on the National Plan Oil Spill Control Agent (OSCA) list or are evaluated as acceptable as per the Operations Chemical Selection, Evaluation and Approval Procedure (EA-91-II-10001) are to be used	Incident Log

Environmental Performance Outcome	Implement chemical dispersant application to enhance biodegradation of hydrocarbons and reduce the impact of surface hydrocarbons on protection priorities.		
Response Strategy	**Control Measures**	**Performance Standard**	**Measurement Criteria**
		Analysis of dispersant amenability provided to IMT within 24 hours of oil delivery to Laboratory	Incident Log
		If dispersant application is approved by the Incident Commander for subsea injection, ROV monitoring of the site will commence to help determine injection method/s	Incident Log IAP
		If dispersant application is approved by the Incident Commander for subsea injection, operational monitoring of dispersant efficacy will be conducted	Incident Log IAP
		Prepare operational NEBA to determine if chemical dispersant application is likely to result in a net environmental benefit. NEBA will consider: + forecast spill modelling of oil comparing simulations with and without effect of chemical dispersants + laboratory dispersant efficacy testing results + operational monitoring results (surveillance and shoreline assessment) showing distribution of floating, stranded oil and location of sensitive fauna and habitats + operational water quality monitoring results showing distribution and concentration of subsea oil (once available) + scientific monitoring water sampling results (SMP1) (once available) + consultation with DoT	Incident Log IAP
		NEBA undertaken each operational period by the relevant Control Agency to determine if response strategy is continuing to have a net environmental benefit. NEBA included in development of following period Incident Action Plan	IAP Incident Log

14 Shoreline Protection and Deflection Plan

Table 14-1 provides the environmental performance outcome, initiation criteria and termination criteria for this strategy.

Table 14-1: Shoreline protection and deflection – objectives, initiation criteria and termination criteria

Environmental Performance Outcome	Implement shoreline protection and deflection tactics to reduce hydrocarbon contact with coastal protection priorities	
Initiation criteria	+ Level 2 or Level 3 spills where shorelines with identified or potential protection priorities will potentially be contacted, and + Approval has been obtained from DoT IC or delegate (as the Control Agency) to initiate response strategy	
Applicable hydrocarbons	**Caley Condensate**	**MDO**
	✓	✓
Termination criteria	+ NEBA has determined that this strategy is unlikely to result in an overall benefit to the affected shoreline/s, and + Agreement is reached with Jurisdictional Authorities to terminate the response strategy	

14.1 Overview

Protection and deflection tactics are utilised to divert hydrocarbons away from sensitive shoreline receptors and are more effective if they are deployed ahead of spill contact. They are typically used to protect smaller, high priority sections of shoreline.

The effectiveness of this response will be dependent on spill characteristics, hydrocarbon type, and the operating environment. Deployment is subject to safety constraints such as the potential grounding of vessels.

Protection and deflection is part of an integrated nearshore/shoreline response to be controlled by DoT as the relevant Control Agency. Santos will undertake first-strike protection and deflection activities as required. Upon assumption of Control Agency responsibilities, DoT will direct resources (equipment and personnel) provided by Santos for the purposes of shoreline protection. Santos will provide all relevant information on shoreline character and oiling collected as part of surveillance activities carried out under its control (refer **Section 10**).

The information provided below is included for planning purposes and represents Santos' first-strike response for protection and deflection activities. In the event of a spill with the potential for shoreline contact, the ongoing response objectives, methodology, deployment locations and resource allocation will be controlled by DoT, as the Control Agency and therefore may differ from that included below.

Information gathered during operational monitoring including shoreline assessments and assessed through an Operational NEBA will guide the selection of protection and deflection locations and techniques.

Shoreline protection and deflection techniques include:

+ nearshore booming, which can involve different booming arrangements including:
  - exclusion booming: boom acts as a barrier to exclude the spill from areas requiring protection
  - diversion booming: booms divert the spill to a specific location where it may be removed (e.g. sandy beach)
  - deflection booming: booms deflect the spill away from an area requiring protection.
+ berms, dams and dykes – uses sandbags or embankments to exclude oil from sensitive areas
+ shoreside recovery – uses nearshore skimmers to collect oil corralled by nearshore booms (also used during shoreline clean-up)
+ passive recovery – uses sorbent booms or pads to collect oil and remove it from the environment. This can be used as a pre-impact tactic where sorbents are laid ahead of the spill making contact with the shoreline
+ non-oiled debris removal – removes debris from the shoreline before it is impacted to reduce overall waste volumes from shoreline clean-up.

The effectiveness of these techniques will be dependent on local bathymetry, sea state, currents/tides and wind conditions and the available resources.

14.2 Implementation guidance

Table 14-2 provides guidance to the IMT on the actions and responsibilities that should be considered when selecting this strategy. **Table 14-3** provides a list of resources that may be used to implement this strategy. Mobilisation times for the minimum resources that are required to commence initial protection and deflection operations, unless directed otherwise by DoT, are listed in **Section 14.4**. The Incident Commander of the DoT’s IMT (once the DoT assumes control) is ultimately responsible for implementing the response, and may therefore determine that some tasks be varied, should not be implemented or be reassigned.

Table 14-2: Implementation guidance – shoreline protection and deflection

Action		Consideration	Responsibility	Complete
Initial Actions	Ensure initial notifications to WA DoT have been made.	Refer to **Table 7-1** for reporting requirements.	Environment Unit Leader	❑
	Collect and provide spill trajectory modelling, other operational monitoring data and existing sensitivity information/mapping to Control Agency for confirmation of priority protection areas and NEBA.		Environment Unit Leader Planning Section Chief	❑
	Where DoT has assumed roles as Control Agency, actions undertaken by DoT may differ to those below.			
	Conduct Operational NEBA to determine if protection and deflection is likely to result in a net environmental benefit using information from shoreline assessments (**Section 10.8**) and any TRPs for the area.	Pre-existing TRPs exist for the majority of the Priority Protection areas, further described in **Section 6.6.1**. TRPs are available on the Santos ER Intranet page [18].	Environment Unit Leader	❑

[18] Where TRPs are unavailable for areas likely to be contacted, refer to other sources of information such as aerial photography, Oil Spill Response Atlas, Pilbara Region Oiled Wildlife Response Plan and WAMOPRA

	If NEBA indicates that there is an overall environmental benefit, develop a Shoreline Protection Plan (IAP Sub-Plan) for each deployment area.	Shoreline Protection Plan should reference any existing TRPs and may include (but not be limited to): + priority nearshore and shoreline areas for protection (liaise with Control Agency for direction on locations) + locations to deploy protection and deflection equipment + permits required (if applicable) + protection and deflection tactics to be employed for each location + list of resources (personnel and equipment) required + logistical arrangements (e.g. staging areas, accommodation, transport of personnel) + timeframes to undertake deployment + access locations from land or sea + frequency of equipment inspections and maintenance (noting tidal cycles) + waste management information, including logistical information on temporary storage areas, segregation, decontamination zones and disposal routes + no access and demarcation zones for vehicle and personnel movement considering sensitive vegetation, bird nesting/roosting areas and turtle nesting habitat (utilise existing roads and tracks first) + Shift rotation requirements.	Operations Section Chief Planning Section Chief Environment Unit Leader	❑

Action		Consideration	Responsibility	Complete
	If required identify vessels with relevant capabilities (e.g. shallow draft) for equipment deployment in consultation with Control Agency.	Ensure vessels have shallow draft and/or a suitable tender (with adequate towing capacity and tie-points) if they are required to access shorelines.	Operations Section Chief Logistics Section Chief	❑
	Deploy shoreline protection response teams to each shoreline location selected and implement response.	If passive recovery and/or non-oiled debris removal has been selected as a tactic, ensure deployment activities prioritise their implementation prior to hydrocarbon contact.	Operations Section Chief On-Scene Commander	❑
Ongoing Actions	Conduct daily re-evaluation of NEBA to assess varying net benefits and impacts of continuing to conduct shoreline protection and deflection activities.		Environment Unit Leader	❑
	Report to the Operations Section Chief on the effectiveness of the tactics employed.		Shoreline Response Programme Manager – AMOSC core group responder	❑
	Response teams to conduct daily inspections and maintenance of equipment.	Shoreline protection efforts will be maintained through the forward operation(s) facilities setup at mainland locations under direction of DoT. Response crews will be rotated on a roster basis, with new personnel procured on an as needs basis from existing human resource suppliers.	Shoreline Response Programme Manager	❑

14.3 Shoreline Protection and Deflection resources

Shoreline protection and deflection equipment available for use by Santos is a combination of Santos owned, AMOSC, AMSA, DoT and OSRL equipment as well as other industry resources available through the AMOSPlan mutual aid arrangements (**Table 14-3**).

Shoreline protection and deflection personnel available to Santos is a combination of AMOSC Staff, AMOSC Core Group Responders (comprising AMOSC trained Santos and Industry personnel), OSRL responders, State Response Team members and National Response Team members.

The level of deployment of equipment and personnel for protection and deflection operations will be commensurate to the spatial extent of shoreline contact, further described in **Section 14.4**, the volume and minimum time of oil arriving and the sensitivity and access constraints of the shoreline in question.

Table 14-3: Shoreline protection and deflection – resource capability

Equipment Type/ Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
AMOSC nearshore boom and skimming equipment'	AMOSC	Beach Guardian (98 x 25 m lengths) Zoom Boom (199 x 25 m lengths) HDB Boom (two 200 m lengths) Curtain Boom (58 x 30 m lengths) Skimmers: Passive Weir GT 185 Desmi 250 Weir Ro-skim Weir boom	Broome – 4; Exmouth – 20; Fremantle – 23; Geelong – 51 Broome – 8; Exmouth – 20; Fremantle – 30; Geelong – 141 Broome – 2 Fremantle – 18; Geelong – 40 Exmouth – 1; Fremantle – 1; Geelong – 1 Exmouth – 1; Geelong – 1 Geelong – 1 Geelong – 2	Response via duty officer within 15 minutes of first call; AMOSC personnel available within one hour of initial activation call. Equipment logistics varies according to stockpile location For mobilisation timeframes refer to **Table 10-12**
AMSA nearshore boom/skimmer equipment	AMSA	Canadyne inflatable Structureflex inflatable Versatech zoom inflatable Slickbar – solid buoyancy Structureflex – solid buoyancy Structureflex – land sea Skimmers: None for inshore HFO or heavy crude	Karratha – 5 Karratha – 10; Fremantle – 15 Karratha – 5; Fremantle – 13 Karratha – 2 Karratha – 3; Fremantle – 10 Karratha – 30; Fremantle – 30, other locations around Australia	Access to National Plan equipment through AMOSC For mobilisation timeframes refer to **Table 10-12**

Equipment Type/ Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
Santos owned nearshore boom/skimming equipment	Santos	Beach Guardian (eight 25 m lengths) Zoom Boom (16 x 25 m lengths) 2 x Desmi DBD16 brush skimmer	Varanus Island Varanus Island One each: Dampier and VI	Within 12 hours for deployment by vessel from VI
Personnel (field responders) for OSR strategies (Trained field response personnel - surge capacity; details provided in **Appendix T**: Cumulative Response Capability Assessment)	AMOSC Staff	16	Fremantle – 5 Geelong – 11	Response via duty officer within 15 minutes of first call. Timeframe for availability of AMOSC personnel dependent on location of spill and transport to site
	AMOSC Core Group (Santos)	12	Perth/NW Australia facilities – 10 Port Bonython (South Australia) – 2	12+ hours
	AMOSC Core Group (Industry)	As per monthly availability (minimum 84)	Office and facility location across Australia	Location dependent. Confirmed at time of activation

14.4 Worst case resourcing requirements

Protection and deflection resourcing requirements have been determined for affected shorelines based on shortest time to contact, length of shoreline contacted, and number of shorelines contacted. Deterministic modelling was used to gauge the worst-case resourcing requirements considering time to shoreline contact. Deterministic run #9 (Surface LOWC, **Figure 10-2**) was selected as it was the simulation that represented maximum length of shorelines contacted >100 g/m^2 from all simulations. Deterministic modelling simulation #5 was used to inform the shortest time to floating oil contact (Surface LOWC**, Figure 10-3**).

The number of shorelines contacted from deterministic run #9 indicates the potential ongoing resource requirements. Earliest arrival time of floating oil from simulation #5 is used to identify the required activation time and initial receptors for protection and deflection equipment and personnel.

Resource requirements for protection and deflection will be situation/receptor specific. TRPs are held by Santos and DoT and have been developed for all the mainland and offshore island PPA's, with the exception of Bedout Island (refer to **Section 6.6.1**) and Karratha-Port Hedland. Given the short time and probability of contact, a TRP for Bedout Island and Karratha-Port Hedland will be written prior to drilling.

Whilst representative of two different simulations, these two deterministic runs do not include all possible spill scenarios and that a single spill may contact other receptors and at different volumes, as presented in **Section 6.3**. However, the selection of these runs will provide the worst-case scenario to base response preparedness arrangements against.

14.4.1.1 Offshore islands

The islands in the EMBA are a mixture of large islands, such as Barrow Island, and smaller uninhabited islands, including Bedout Island. Access to many of these islands will be limited to shallow draft vessels, or larger vessels supported by smaller shallow draft vessels. Helicopters may also be deployed to deliver equipment and personnel and remove collected waste, further discussed in the shoreline clean-up strategy in **Section 15.4.1**.

From deterministic simulation #5, the earliest shoreline arrival time at offshore islands, is at Bedout island, with contact predicted within 2 days. For deterministic simulation #9, island locations contacted over the course of the 77-day release include Montebello Islands, Lowendal Islands, Muiron Islands, Barrow Island and Bedout Island. The arrival of hydrocarbons at these islands peaks at week 9, as per **Table 15-5**, showing contact at each of these receptors simultaneously.

Table 14-4 shows the required scaling of equipment to shoreline receptors beyond the initial contact at Bedout Island (2 days). Five teams will be staggered at these locations to implement protection and deflection from weeks 1-9. It is assumed that given the staggered shoreline contact, teams will be able to move between locations to set up and monitor protection and deflection booms.

Table 14-4: Shoreline protection and deflection – arrival of hydrocarbons at offshore islands (deterministic simulation #9)

Receptor	Time from shoreline contact	Required protection and deflection resources
Montebello Islands	Week 5	2 protection and deflection teams to implement and monitor P & D at these receptors.
Lowendal Islands	Week 9	
Barrow Island	Week 7	
Southern Island Coast (Contact limited to Bessieres and Serrurier Islands in the Southern Island Coast receptor)	Week 6	2 protection and deflection teams to implement and monitor P & D at these receptors.
Muiron Islands	Week 6	
Bedout Island	Day 2[19]	1 protection and deflection team

14.4.1.2 Mainland locations

From deterministic simulation #5, the earliest shoreline arrival time at mainland locations, is at Port Hedland-Eighty Mile beach, with predicted contact in 3 days. All other mainland locations contacted in this scenario have predicted contact times greater than 64 days, including Dampier Archipelago, Southern Island Coast, Ningaloo Coast North and South, Shark Bay Outer Coast.

For deterministic simulations #9, mainland locations contacted over the course of the 77-day release include Dampier Archipelago, Northern Island Coast, Southern Island Coast, Ningaloo Coast North and Ningaloo Coast South. **Table 14-5** shows the required scaling of equipment to shoreline receptors beyond the initial contact at Port Hedland-Eighty Mile Beach (day 3). Seven teams will be staggered at these locations to implement protection and deflection from weeks 1-14. It is assumed that given the staggered shoreline contact, teams will be able to move between locations to set up and monitor protection and deflection boom.

Table 14-5: Shoreline protection and deflection – arrival of hydrocarbons at mainland locations (deterministic simulation #9)

Receptor	Time from shoreline contact	Required protection and deflection resources
Dampier Archipelago	Week 4	2 protection and deflection teams to implement and monitor P & D at these receptors.
Northern Island Coast	Week 9	
Ningaloo Coast North	Week 5	3 protection and deflection teams to implement and monitor P & D at these receptors.
Ningaloo Coast South	Week 14	
Port Hedland- Eighty Mile Beach	Day 3[20]	2 protection and deflection teams

[19] Contact timeframe from deterministic run #5. This receptor is not contacted from deterministic run #9.

[20] Contact timeframe from deterministic run #5. This receptor is not contacted from deterministic run #9.

14.4.1.3 Resourcing

Capability allows for mobilisation of protection and deflection resources in **Section 14.3** by day 1 if required (**Table 14-6)**. The shortest contact detailed in **Section 14.4.1.1** and **Section 14.4.1.2** is not predicted till day 2 at Bedout Island and day 3 at Port Hedland-Eighty Mile. From the deterministic modelling all other island and mainland receptors have longer contact times (**Section 14.4.1.1** and **Section 14.4.1.2)** between week 4 and 14 allowing sufficient time to organise, mobilise and deploy protection and deflection personnel and equipment at PPAs prior to hydrocarbon contact, guided by the ongoing operational monitoring. A typical shoreline protection and deflection team would consist of 12 personnel as a minimum, comprised of the following:

+ 1 x Incident Commander/Site Supervisor;
+ 1 x Shallow draft vessel skipper;
+ 1 x Shallow draft vessel deck-hand; and
+ 9 x Protection and deflection operatives.

A minimum of three teams (a total of 36 personnel) would be required to cover these two initial contact locations; this is based on 1 team deployed to Bedout Island, and 2 teams deployed to the Port Hedland-Eighty Mile Beach area. A further 9 teams would be required to cover the receptors contacted through the life of the spill, assuming resources will be able to set up and monitor protection and deflection boom across multiple locations specified in

Table 14-4 and **Table 14-5**. The total required teams for the worst-case P&D response are 12, noting that there may be further opportunities to stagger teams across receptors as the spill develops.

The resourcing requirements will be determined based on feedback from SCAT activities and in consultation with DoT as the Control Agency. Shoreline effort will likely consist of a combination of protection and deflection and clean-up, with resources often working together and/or in parallel.

Table 14-6: Shoreline protection and deflection – first strike response timeline

Task	Time from shoreline contact (predicted or observed)
IMT confirms shoreline contact prediction, confirm if protection of shoreline sensitivity/s is required and begins sourcing resources	<4 hours
Santos Offshore Core Group mobilised to protection site or deployment port location	<12 hours
Protection booming equipment mobilised to protection site or deployment port location	<12 hours
Waste storage equipment mobilised to protection site or deployment port location	<12 hours
Boom deployment vessel / remote island transfer vessel mobilised to protection site or deployment port location	<12 hours
AMOSC Staff and Industry Core Group mobilised to protection site or deployment port location	<24 hours
Protection/deflection operation deployed to protection location	<24 hours (weather/daylight dependent)
Minimum Resource Requirements	
NB: Resource requirements for protection and deflection will be situation/receptor specific. TRPs, if developed for the area/receptor will outline suggested resource requirements. TRPs are held by Santos and DoT. For further description on relevant TRPs refer to **Section 6.6.1**[21]. Given the short contact time to Bedout Island, a TRP will be written prior to drilling. Indicative first strike resources for a single site protection area are: + One small vessel suitable for boom deployment + Shoreline (e.g. Beach Guardian) and nearshore booms (e.g. Zoom Boom) plus ancillary equipment (e.g. anchors, stakes) sufficient for protection of shoreline resource (refer TRP if applicable) + One skimmer appropriate for oil type + Waste storage equipment + One Protection and Deflection Team + Personal protective equipment	

[21] Where TRPs are unavailable for areas likely to be contacted, refer to other sources of information such as aerial photography, Oil Spill Response Atlas, Pilbara Region Oiled Wildlife Response Plan and WAMOPRA

14.5 Environmental performance

Table 14-7 indicates the environmental performance outcomes, controls and performance standards for this response strategy.

Table 14-7: Environmental performance – shoreline protection and deflection

Environmental Performance Outcome	Implement shoreline protection and deflection tactics to reduce hydrocarbon contact with coastal protection priorities		
Response Strategy	**Control Measures**	**Performance Standards**	**Measurement Criteria**
Shoreline Protection and Deflection	**Response Preparedness**		
	Access to protection and deflection equipment and personnel through AMOSC, AMSA National Plan, OSRL and TRG	Maintenance of access to protection and deflection equipment and personnel through AMOSC, AMSA National Plan, OSRL and TRG throughout activity as per **Table 14-3.**	MoU for access to National Plan resources through AMSA
			AMOSC Participating Member Contract
			OSRL Associate Member Contract
			TRG arrangements
	Small vessel providers for nearshore booming operations	Maintenance of a list of small vessel providers for Exmouth, Dampier and Broome regions	List of small vessel providers
	The performance standards for TRP's are found in **Section 8.3.**		
	Response Implementation		
	Mobilisation of minimum requirements for initial response operations	Minimum requirements mobilised in accordance with **Table 14-6** unless directed otherwise by the Control Agency	Incident log
	Shoreline Protection and Deflection Plan	Santos IMT to confirm protection priorities in consultation with the control agency.	IAP/Incident Log
		Prepare operational NEBA to determine if shoreline protection and deflection activities are likely to result in a net environmental benefit	Records indicate operational NEBA completed prior to shoreline protection and deflection activities commencing
		IAP Shoreline Protection and Deflection Sub-plan developed to provide	Records indicate IAP Shoreline Protection and Deflection Sub-plan

Environmental Performance Outcome	Implement shoreline protection and deflection tactics to reduce hydrocarbon contact with coastal protection priorities		
Response Strategy	**Control Measures**	**Performance Standards**	**Measurement Criteria**
		oversight and management of shoreline protection and deflection operation	prepared prior to shoreline protection and deflection operations commencing
		NEBA undertaken each operational period by the relevant Control Agency to determine if response strategy is continuing to have a net environmental benefit. NEBA included in development of following period Incident Action Plan	IAP/Incident Log
		Ensure operational NEBA considers waste management, to ensure environmental benefit outweighs the environmental impact of strategy implementation which may include secondary contamination	Incident Log IAP
	Spill response activities selected on basis of a Net Environmental Benefit Analysis	A NEBA is undertaken for every operational period	Incident Log contains NEBA
	Use of shallow draft vessels for shoreline and nearshore operations	Shallow draft vessels are used for shoreline and nearshore operations unless directed otherwise by the designated Control Agency (i.e., DoT)	Vessel specification documentation contained in IAP.
	Conduct shoreline/nearshore habitat/bathymetry assessment	Unless directed otherwise by the designated Control Agency (i.e., DoT) a shoreline/nearshore habitat/bathymetry assessment is conducted prior to nearshore activities	IAP records assessment records

15 Shoreline Clean-up Plan

Table 15-1: Shoreline clean-up – environmental performance outcome, initiation criteria and termination criteria

Environmental Performance Outcome	Implement shoreline clean-up tactics to remove stranded hydrocarbons from shorelines in order to reduce impact on coastal protection priorities and facilitate habitat recovery	
Initiation criteria	+ Level 2 or Level 3 spills where shorelines with identified or potential protection priorities that will be, or have been, contacted + NEBA indicates shoreline clean-up will benefit receptors, and + Approval has been obtained from DoT IC or delegate (as the Control Agency) to initiate response strategy	
Applicable hydrocarbons	**Caley Condensate**	**MDO**
	✓	✗
Termination criteria	+ As directed by DoT	

15.1 Overview

Shoreline clean-up aims to remove hydrocarbons from shorelines and intertidal habitat to achieve a net environmental benefit. Removal of these hydrocarbons helps reduce remobilisation of hydrocarbons and contamination of wildlife, habitat and other sensitive receptors. Shoreline clean-up is often a lengthy and cyclical process, requiring regular surveys to monitor the effectiveness of clean-up activities and assess if they are resulting in any adverse impacts.

Shoreline clean-up is part of an integrated nearshore/ shoreline response to be managed by the relevant Control Agency. Where Santos is not the Control Agency (refer to **Table 4-2**), it will undertake first-strike activations as required. In this circumstance, the relevant Control Agency will direct resources (equipment and personnel) provided by Santos for the purposes of shoreline clean-up. The information obtained from Operational Monitoring (refer **Section 10**), will be used by the IMT in the development of the operational NEBA to inform the most effective clean-up tactics (if any) to apply to individual sites. Intrusive shoreline clean-up techniques have the potential to damage sensitive shorelines. The appropriateness of clean-up tactics will be assessed against natural attenuation for sensitive sites. Selection of shoreline clean-up methods and controls to prevent further damage from the clean-up activities are to be undertaken in consultation with the Control Agency and selected based on NEBA. DAWE are the designated Jurisdictional Authority for all spills that contact the shorelines of Ashmore Reef AMP identified in this OPEP; the Santos IMT (as Control Agency for this island as it is in Commonwealth waters) will liaise with DAWE to direct resources for the purposes of shoreline clean-up activities.

Spill modelling indicates if a worst-case spill were to occur as a result of Bedout Multi-Well Drilling activities, shoreline contact would occur and therefore clean-up of shorelines is likely to be required.

MDO is likely to be difficult to remove given its light nature and high weathering potential. It can be readily washed from sediments by wave and tidal flushing. The likely waste products from a diesel spill shoreline response would be contaminated sand and debris.

Modelling confirms that light, volatile components of Caley Condensate accounting for 62% of the hydrocarbon by volume will evaporate within 48 hours under moderate wind conditions (5 m/s). The low asphaltene content of Caley Condensate (less than 0.5% by mass) results in a low tendency for the hydrocarbons to take up water and form water in oil emulsions (**Appendix A**).

Shoreline clean-up techniques include:

- Shoreline Clean-up Assessment – uses assessment processes (refer to **Section 10.8**) to assess shoreline character, assess shoreline oiling and develop recommendations for response. Typically, this should be the first step in any shoreline clean-up response.
- Natural Recovery – oiled shorelines are left untreated, and the oil naturally degrades over time.
- Manual and Mechanical Removal – removes oil and contaminated materials using machinery, hand tools, or a combination of both.
- Washing, Flooding and Flushing – uses water, steam, or sand to flush oil from impacted shoreline areas.
- Sediment reworking and Surf washing – uses various methods to accelerate natural degradation of oil by manipulating the sediment.

15.2 Implementation guidance

Table 15-1 provides the environmental performance outcome, initiation criteria and termination criteria for this strategy. **Table 15-2** provides guidance to the IMT on the actions and responsibilities that should be considered when selecting this strategy. **Table 15-3** provides a list of resources that may be used to implement this strategy. Mobilisation times for the minimum resources that are required to commence initial shoreline clean-up operations, unless directed otherwise by DoT, are listed in **Table 15-4**. The OSC and/or Incident Commander is ultimately responsible for implementing the response, and may therefore determine that some tasks be varied, should not be implemented or be reassigned.

Table 15-2: Implementation guidance – shoreline clean-up

	Action	Consideration	Responsibility	Complete
Initial Actions	**Actions below are indicative only and are at the final determination of DoT as the Control Agency.**			
	Initiate shoreline clean-up assessment (if not already activated).	Refer to **Section 10.8** for additional information	Environment Unit Leader	❑
	Using results from Shoreline and Coastal Habitat Assessment, conduct Operational NEBA to assess shoreline-clean up suitability and recommended tactics for each shoreline location.	Shoreline Clean-up Assessment Teams are responsible for preparing field maps and forms detailing the area surveyed and make specific clean-up recommendations. The condition of affected shorelines will be constantly changing. Results of shoreline surveys should be reported as quickly as possible to the IMT to help inform real-time decision-making. Engage a Heritage Adviser if spill response activities overlap with potential areas of cultural significance.	Environment Unit Leader	❑
	If operational NEBA supports shoreline clean-up, prepare a Shoreline Clean-up Plan for inclusion in the IAP,	Shoreline Clean-up Plan may include (but not be limited to): + clean-up objectives + clean-up end points (may be derived from Shoreline Clean-up Assessment) + clean-up priorities (may be derived from Shoreline Clean-up Assessment) + assessment and location of staging areas and worksites (including health and safety constraints, zoning)	Environment Unit Leader Planning Section Chief Operations Section Chief	❑

Action	Consideration	Responsibility	Complete
	+ utility resource assessment and support (to be conducted if activity is of significant size in comparison to the size of the coastal community) + permits required (if applicable) + chain of command for onsite personnel + list of resources (personnel, equipment, personal protective equipment) required for selected clean-up tactics at each site + details of accommodation and transport management + security management + waste management information, including logistical information on temporary storage areas, segregation, decontamination zones and disposal routes + establish no access and demarcation zones for vehicle and personnel movement considering sensitive vegetation, bird nesting/roosting areas and turtle nesting habitat (utilise existing roads and tracks first). + Shift rotation requirements. Refer to IPIECA-IOGP (2015) for additional guidance on shoreline clean-up planning and implementation.		
In consultation with the Control Agency procure and mobilise resources to a designated port location for deployment, or directly to location via road transport.		Logistics Section Chief Supply Unit Leader Deputy Logistics Officer (DoT IMT)	❑

	Action	Consideration	Responsibility	Complete
	Deploy shoreline clean-up response teams to each shoreline location to begin operations under direction of the Control Agency.	Each clean-up team to be led by a Shoreline Response Team Leader, who could be an AMOSC Core Group Member or trained member of the AMSA administered National Response Team (as per the MoU agreement between Santos and AMSA). Clean-up teams and equipment will be deployed and positioned as per those observations by the Shoreline Clean-up Assessment Teams in consultation with the DoT. Team members will verify the effectiveness of clean-up, modifying guidelines as needed if conditions change.	Operations Section Chief Logistics Section Chief Deputy Logistics Officer (DoT IMT)	❑
Ongoing Actions	Shoreline Response Team Leader shall communicate daily reports to the IMT Operations Section Chief to inform of effectiveness of existing tactics and any proposed tactics and required resources.	Where possible, maintain some consistency in personnel within Shoreline Response Teams. If the same personnel are involved in shoreline clean-up assessment and clean-up, they will be better placed to adapt their recommendations as the clean-up progresses and judge when the agreed end-points have been met.	Shoreline Response Programme Manager Operations Section Chief	❑
	The IMT Operations Section Chief shall work with the Planning Section Chief to incorporate recommendations into the Incident Action Plans for the following operational period, and ensure all required resources are released and activated through the Supply Unit Leader and Logistics Section Chiefs.		Operations Section Chief Planning Section Chief	❑
	Monitor progress of clean-up efforts and report to the Control Agency.		Operations Section Chief On-Scene Commander Deputy OSC (DoT FOB)	❑

Table 15-3: Shoreline clean-up – resource capability

Equipment Type/Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
Manual clean-up tools (shovels, rakes, wheelbarrows, bags, etc.)	AMOSC shoreline kits	Shoreline support kits first strike	Fremantle – 1 Geelong – 1	Response via duty officer within 15 minutes of first call – AMOSC personnel available within one hour of initial activation call; equipment logistics varies according to stockpile location (**Table 10-12**)
	Santos	One shoreline clean-up container	Varanus Island	Within 12 hours for deployment from VI
	Hardware suppliers	As available	Exmouth, Karratha, Perth	
Shoreline flushing (pumps/hoses)	AMOSC	Shoreline flushing kit Shoreline impact lance kit	Fremantle – 1; Geelong – 1 Geelong – 1	Response via duty officer within 15 mins of first call – AMOSC personnel available within one hour of initial activation call For mobilisation timeframes see **Table 10-12**
Nearshore skimmers/hoses	AMOSC AMSA	See Protection and Deflection (**Table 14-3**)		
Decontamination/staging site equipment	AMOSC	Decontamination station – 3	Fremantle – 1; Exmouth – 1; Geelong – 1	Response via duty officer within 15 mins of first call – AMOSC personnel available within one hour of initial activation call For mobilisation timeframes see **Table 10-12**

Equipment Type/Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
	AMSA	Decontamination station – 4	Karratha – 2; Fremantle – 2	Access to National Plan equipment through AMOSC
	Oil spill equipment provider (e.g. Global Spill., PPS)	As available	Perth	Subject to availability
Waste storage (including temporary storage and waste skips and tanks for transport)	AMOSC temporary storage	Fast tanks – (9,000 L & 3,000 L)) Vikotank (13,000 L) Lamor (11,400 L) IBCs (1 m^3)	Broome –1; Geelong –4; Fremantle –2; Exmouth – 2 Broome – 1; Geelong – 1; Fremantle – 4; Geelong - 13	15 mins of first call – AMOSC personnel available within one hour of initial activation call For mobilisation timeframes see **Table 10-12**
	AMSA temporary storage	Fast tanks – (10 m^3) Structureflex – (10 m^3) Vikoma – (10 m^3)	Darwin –2; Karratha –2; Fremantle – 4; Adelaide – 1; Brisbane – 2; Devonport – 2; Melbourne – 1; Sydney – 4; Townsville - 4 Brisbane – 1; Adelaide – 2; Darwin – 1; Adelaide – 1; Brisbane – 1; Devonport – 2; Fremantle – 4; Fremantle – 3; Melbourne – 2; Sydney – 2; Townsville - 4	Access to National Plan equipment through AMOSC
	Via Waste Management service provider	Refer to Waste Management **(Table 17-3)**	Perth, Karratha, Broome	24+ hours

Equipment Type/Personnel Required	Organisation	Quantity Available	Location	Mobilisation Timeframe
Personnel (field responders) for OSR strategies (Trained field response personnel - surge capacity; details provided in Appendix T)	AMOSC Staff	16	Fremantle – 5 Geelong – 11	Response via duty officer within 15 minutes of first call. Timeframe for availability of AMOSC personnel dependent on location of spill and transport to site
	AMOSC Core Group (Santos)	12	Perth/NW Australia facilities – 10 Port Bonython (South Australia) – 6	12+ hours
	AMOSC Core Group (Industry)	As per monthly availability (minimum 84)	Office and facility location across Australia	Location dependent. Confirmed at time of activation
	Santos contracted Work Force Hire company (e.g. Dare)	As per availability (up to 2,000)	Australia-wide	Subject to availability (indicatively 72+ hours)

Table 15-4: Shoreline clean-up – first strike response timeline

Task	Time from shoreline contact (predicted or observed)
IMT confirms shoreline contact prediction, confirms applicability of strategy and begins sourcing resources.	<4 hours
Santos Offshore Core Group mobilised to site/deployment port location.	<24 hours
Clean-up equipment mobilised to site/deployment port location.	<24 hours
Waste storage equipment mobilised to site/ deployment port location.	<24 hours
Remote island transfer vessel (if required) mobilised to deployment port location.	<24 hours
AMOSC Staff, Industry Core Group and Labour Hire mobilised to site/deployment port location.	<48 hours
Clean-up operation deployed to clean-up area under advice from Shoreline Clean-up Assessment Team.	<48 hours
Minimum Resource Requirements	
NB: Resource requirements for shoreline clean-up will be situation/receptor specific. TRPs if developed for the area/receptor will outline suggested resource requirements and shoreline assessments (as part of operational monitoring strategy) will be conducted prior to clean-up to confirm techniques. TRPs are held by Santos and DoT. For further description on relevant TRPs refer to **Section 6.6.1**[22]. A TRP will be written for Bedout island and Karratha-Eighty Mile Beach prior to drilling due to the short contact time for floating and accumulated hydrocarbons. Indicative minimum requirements for one Santos-a ctivated shoreline clean-up team are: + manual clean-up/shoreline flushing equipment kit + waste storage (bags, temporary storage tanks, skips as appropriate) + decontamination/staging equipment kit + personal protective equipment. One clean-up team comprises: + one Team Leader (AMOSC staff, Industry Core Group or Santos Core Group) + twenty to twenty-five shoreline clean-up responders (AMOSC Core Group, Santos contracted labour hire personnel)	

15.3 Shoreline clean-up resources

Shoreline clean-up equipment available for use by Santos is a combination of Santos owned, AMOSC, AMSA, DoT and OSRL equipment as well as other industry resources available through the AMOSPlan mutual aid arrangements. Shoreline consumables are available through hardware, PPE and specialist oil/chemical spill suppliers and mobile plant equipment is available through hire outlets in Perth, Karratha and other regional centres. Where vessel deployments are required, Santos will leverage from existing contracted vessel providers.

[22] Where TRPs are unavailable for areas likely to be contacted, refer to other sources of information such as aerial photography, Oil Spill Response Atlas, Pilbara Region Oiled Wildlife Response Plan and WAMOPRA.

Shoreline clean-up personnel available to Santos is a combination of AMOSC Staff, AMOSC Core Group Responders (comprising AMOSC trained Santos and Industry personnel), OSRL responders, State Response Team members and National Response Team members. Personnel for manual clean-up and mobile plant operation can be accessed through Santos' labour hire arrangements.

The level of deployment of equipment and personnel for clean-up will be commensurate to the spatial extent of shoreline contact, the volume of oil arriving and the sensitivity and access constraints of the shoreline in question. Once activated as Control Agency, deployment will be under the direction of DoT and the advice of shoreline clean-up specialists from AMOSC Core Group and National/State response teams. Shoreline Clean-up Assessments (**Section 10.8**) will provide information to guide the clean-up strategy and deployment of resources.

15.4 Worst case resourcing requirements

Shoreline clean-up requirements have been determined for affected shorelines based on three deterministic scenarios (individual simulations). Deterministic run #9 (Surface LOWC, **Figure 10-2**) was selected as it was the simulation that contacted the largest number of islands (and represented maximum length of shorelines contacted > 100 g/m^2 from all simulations). Islands have different resourcing requirements and clean-up considerations to mainland locations. Deterministic run #31 (Surface LOWC, **Figure 15-1**) was selected as it had the highest predicted accumulated shoreline mass across all shorelines and was also representative of the spill contacting mostly mainland locations. Deterministic modelling simulation #5 was used to inform the shortest time to floating and accumulated oil contact (Surface LOWC, **Figure 10-3**). The shoreline clean-up requirements are considered conservative as they do not take into account the potential reduction in shoreline loading achieved through potential Containment and Recovery and/or SDA application.

Resourcing requirements for shoreline clean-up operations have been determined based on a manual clean-up rate of 1 m^3 of oily waste per person per day. A bulking factor of 10x has been applied to manual clean-up activities, i.e., it is assumed that 10% of manually collected oily waste is oil. At some mainland locations, it may be possible to employ mechanical removal techniques (earth moving equipment), which can remove up to 150 m^3 of oily waste per mechanical aid per day. However, the tables below have not assumed these methods, as the suitability of mechanical removal should be assessed for each clean-up segment during SCAT assessments (e.g. taking into account seasonality of receptors and clean-up end points).

Weekly loading data from deterministic run #9 and #31 have been used to inform calculations for resourcing requirements as presented in **Table 15-5** and **Table 15-6**. Weekly loading represents the net volume of oil remaining on the shoreline following any weekly oil arrival and oil removed through natural processes. Earliest arrival time of floating oil from simulation #5 is used to identify the required activation time for shoreline clean-up equipment.

Whilst representative of three different simulations, these three deterministic runs do not include all possible spill scenarios and a single spill may contact other receptors and at different volumes, as presented in **Section 6.3**. The information presented in **Table 15-5** and **Table 15-6** is to demonstrate that Santos can obtain the resources to scale up to the worst-case shoreline loading volumes at either remote island or mainland locations. In the event of an incident, Santos would use initial operational monitoring data (e.g. trajectory modelling and aerial surveillance) to determine where the available resources should be allocated for an effective clean-up response.

15.4.1 Operational and environmental considerations affecting resourcing

Tidal ranges in the EMBA are large (7 to 8 m) and much of the coastline is remote and inaccessible via road, making many shoreline clean-up techniques difficult and their use may result in greater environmental impacts than the oil itself. In addition, the remote nature, presence of dangerous fauna (i.e., saltwater crocodiles and Irukandji jellyfish) present significant safety risks to responders working in these environments.

Large scale operations involving large numbers of personnel may cause adverse environmental impacts at many of these sensitive shoreline locations. The constant removal of oil, even via manual removal can result in a removal of substrate (e.g. sand, pebbles). If intrusive clean-up is conducted frequently, over a long period of time and along contiguous lengths of coastline, this may result in geomorphological changes to the shoreline profile and adverse impacts to shoreline invertebrate communities which provide an array of ecosystem services (Michel, *et al*., 2017).

Given the safety constraints and ecological sensitivities of these shorelines, shoreline clean-up operations should be conducted by smaller teams for a longer period of time. Intermittent manual treatment (<20 visits/month) and use of passive recovery booms is likely to be more effective than intrusive methods (e.g. intrusive manual removal >20 visits/month). Although this may take longer to undertake the clean-up, it is considered that the benefits outweigh the impacts as smaller teams are more targeted, recovering more oil and less sand and debris, reducing trampling of oil into the shore profile and will minimise ecological impacts on the shorelines and their sensitive species.

The number of shoreline clean-up teams recommended to treat these shorelines (as shown in **Table 15-5** and **Table 15-6)** is not based on extensive, intrusive and contiguous removal of oil and waste along all shorelines, but rather use of smaller teams and at lower frequency of visits. Where shoreline based manual removal is safe and deemed advantageous by shoreline clean-up assessment teams and operational NEBA, this should be conducted via land access (if possible) or via suitable vessels. However, it should be noted that it is generally not feasible to move response equipment into and out of mangroves, tidal flats and delta environments without causing excessive damage. Even foot traffic must be minimised, either by laying down wooden walkways or relying on vessel-based activities as much as possible (API, 2020). Santos has considered the access limitations, safety issues and number of clean-up teams that may be able to operate in each of these environments. A summary of these findings is presented below.

15.4.1.1 Offshore islands

The islands in the EMBA are a mixture of large islands, such as Barrow Island, and smaller uninhabited islands, including Bedout Island. Access to many of these islands will be limited to shallow draft vessels, or larger vessels supported by smaller shallow draft vessels. Helicopters may also be deployed to deliver equipment and personnel and remove collected waste. Only Barrow Island has aircraft access and roads across the island providing land-based access. Manual removal is the preferred method of clean-up for these islands.

Access and all clean-up activities will be conducted via vessels or helicopters in front of the primary dune of the impacted shoreline. Santos will not access any areas behind the primary dune of impacted offshore islands during any stage of the clean-up operation, in order to minimise impacts.

If the impacted shorelines can be accessed with a barge and landing craft, crew on the barge will deliver an appropriate number of clean-up packs (to cater for the number of response personnel defined in the IAP) onto the impacted shoreline above the high tide mark. A helicopter will deliver the appropriate number of clean-up packs if barge access is not possible.

Response personnel may be transported to the impacted shoreline on a barge. If access is not possible by barge, helicopters may be used to transport personnel. Response personnel will not camp on the islands due to potential for additional impacts from this activity.

Initially, response personnel will shovel the oily waste into small manageable bags (weighing 20–30 kg when full) which will be stored in a lined, temporary storage area until they are removed from the island. The temporary storage area will be located at the bottom of the primary dune and above the Highest Astronomical Tide (HAT) mark.

Modelling indicates that oil would start contacting islands (Montebello Islands) from week 5 (1.4 m^3) at concentrations 100 g/m^2 or above. A peak loading is predicted to occur at Muiron Islands in week 7 (234.3 m^3). As indicated in **Table 15-5** the weekly loading in week 7 is high and distributed across a number of islands and mainland locations. During week 7 and 9, the volumes of waste produced (taking into account bulking) will exceed the number of teams required to remove all of this waste. However, due to the sensitivity of these remote islands, sending large numbers of teams to these sites may cause impacts in addition to the oil itself, such as trampling of oil into the beach profile and impacts to receptors beyond the HAT. Resource planning in **Table 15-5** has accounted for retaining additional teams in weeks 9 and 10 to enable surplus volumes to be removed.

From Deterministic simulation #5, the earliest shoreline arrival time at offshore islands, is at Bedout island, with predicted contact in 2 days. All other island locations contacted in this scenario are greater than 63 days, including Lowendal, Barrow, Thevenard, Montebello and Muiron Islands.

15.4.1.2 Mainland locations

The majority of mainland locations have reasonable access either via 4WD tracks or via shallow draft vessels, with the exception of the Dampier Archipelago, which includes numerous small islands. The mainland locations listed in **Table 15-5** include long segments (e.g. 100 - 200 km), so shoreline loadings could extend across a large geographic area. Numerous long sandy beaches are also present across this area, providing potential for mechanical removal (upon agreement with SCAT personnel and DoT).

Modelling indicates contact with mainland locations commences in week 3 (Roebuck-Eighty Mile Beach), with a sharp rise in loadings in week 8 on Port Hedland-Eighty Mile Beach (1,011.6 m^3).

From Deterministic simulation #5, the earliest shoreline arrival time at mainland locations, is at Port Hedland-Eighty Mile beach, with predicted contact in 3 days. All other mainland locations contacted in this scenario are greater than 64 days, including Dampier Archipelago, Southern Island Coast, Ningaloo coast North and South, Shark Bay Outer Coast.

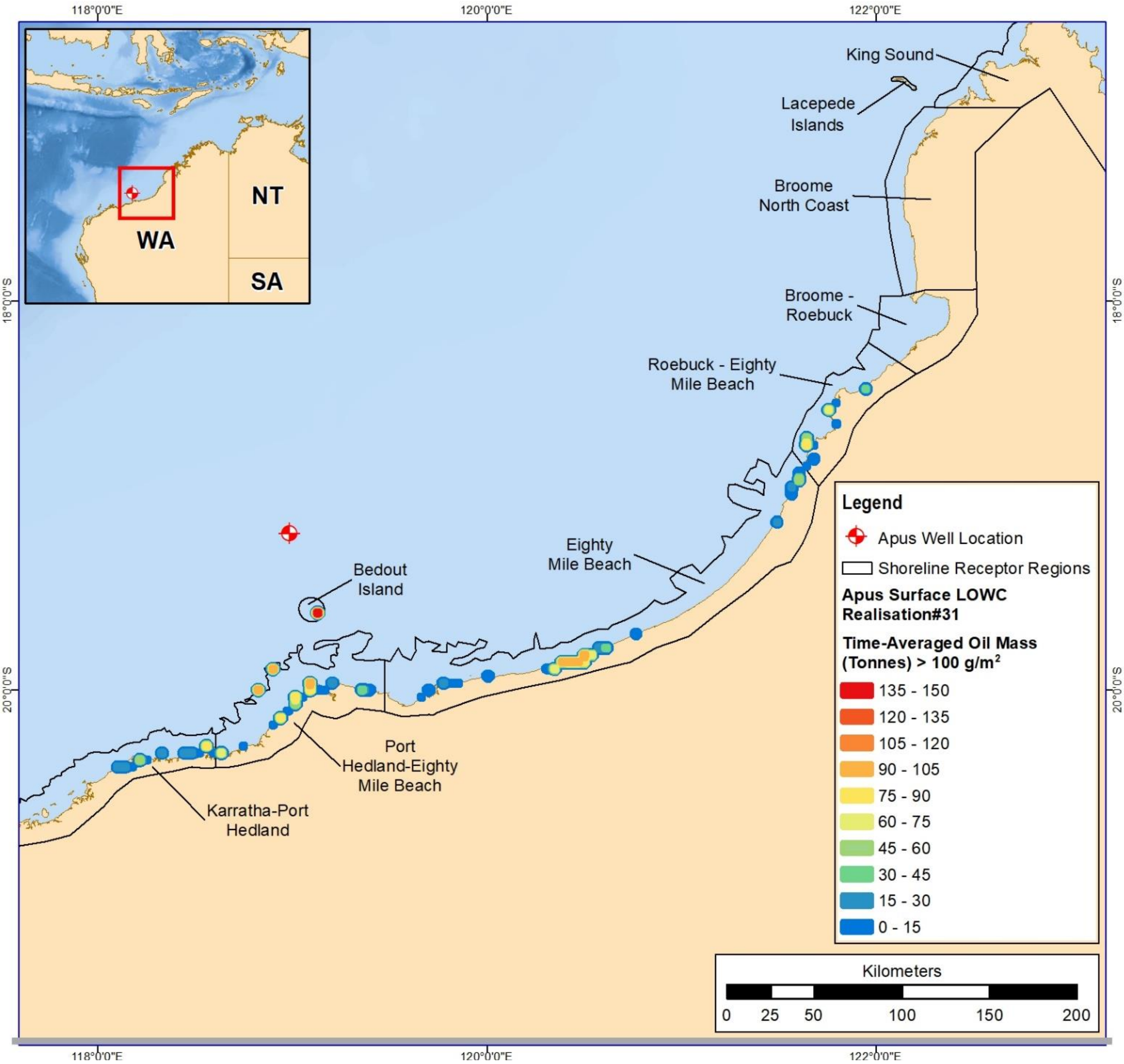

Figure 15-1: Simulation with the highest predicted shoreline mass >100 g/m² using the deterministic modelling results from simulation #31 for the surface LOWC (GHD, 2021)

Table 15-5: Resource requirements for shoreline clean-up for priority protection areas based on deterministic run #9 (GHD, 2021b)

Time (week)	Weekly change in mass of oil ashore (m³) at PPAs									Maximum weekly loading (m³)	Potential maximum waste generated (m³/week) - bulking factor of 10	Number of shoreline clean-up teams recommended (max 10 personnel/team)	Maximum volume collected (m³/week) by teams
	Dampier Archipelago	Northern Islands Coast	Montebello Islands	Lowendal Islands	Barrow Island	Southern Islands Coast	Muiron Islands	Ningaloo Coast North	Ningaloo Coast South				
1-3	0	0	0	0	0	0	0	0	0	0	0	0	n/a
4	8.4	0	0	0	0	0	0	0	0	8.4	84	1	70
5	2.7	0	1.4	0	0	0	0	12.9	0	17.0	170	2	140
6	0	0	0	0	0	23.2	13.0	20.7	0	56.9	569	8	560
7	41.0	0	45.2	0	28.2	78.7	234.3	207.1	0	634.5	6,345	25-30	2,100
8	0	0	19.4	0	57.0	6.1	0	29.4	0	111.9	1,119	20-25	1,750
9	196.9	28.9	126.5	26.8	76.2	50.8	42.3	122.8	0	671.2	6,712	30-35	2,450
10	8.8	1.6	0	0	15.0	0.0	0	0	0	25.4	254	30-35*	2,450
11	0	0	0	0	0	0	0	0	0	0	0	0	n/a
Relief well drilled													
12	0	0	2.4	0	25.8	16.7	0	0	0	44.9	449	5	350
13	89.6	0	254.5	0	141.0	12.1	0	3.8	0	501	5,010	20-25	1,750
14	0	0	0	0	0	0	0	0	9.1	9.1	91	1	70
15	0	0	0	0	0	0	16.3	39.9	0	56.2	562	8	560
16	0	0	0	0	0	0	21.3	119.9	0	141.2	1,412	10-15	1,050

** Additional teams retained during week 10 to enable additional volumes to be collected from previous week that have not weathered or been removed by clean-up activities. Many of these locations are remote islands and sending large numbers of teams to these locations could create secondary impacts. As described above, sending smaller teams for longer periods of time is likely to be less intrusive and reduce the ecological impacts from clean-up activities.*

Table 15-6: Resource requirements for shoreline clean-up for priority protection areas based on deterministic run #31 (GHD, 2021b)

Time (week)	Weekly change of oil ashore (m^3) at PPAs					Maximum weekly oil ashore (m^3)	Potential maximum waste generated (m^3/week) - bulking factor of 10	Number of shoreline clean-up teams recommended (max 10 personnel/team)	Maximum volume collected (m^3/week) by teams
	Port Hedland – Eighty Mile Beach	Karratha – Port Hedland	Eighty Mile Beach	Roebuck – Eighty Mile Beach	Bedout Island				
1-2	0	0	0	0	0	0	0	n/a	n/a
3	0	0	0	191.6	0	191.6	1,916	15-20	1,400
4	0	0	0	342.8	0	342.8	3,428	30-35	2,450
5	0	0	281.5	10.8	32.2	324.5	3,245	30-35	2,450
6	172.2	0	60.5	0	0	232.7	2,327	30-35	2,450
7	117.6	0	71.6	0	0	189.2	1,892	25-30	2,100
8	1,011.6	616.7	0	0	1.0	1,629.3	16,293	30-40	2,800
9	0	0	0	0	0	0	0	20	1,400
10	0	0	0	0	0	0	0	20	1,400
11	0	0	89.8	0	0	89.8	898	10-15	1,050
Relief well drilled									
12	0	0	0	0	0	0	0	5-10	700
13	0	0	0	0	2.4	2.4	24	5-10	700
14	0	0	0	0	0	0	0	5-10	700
15	0	0	0	0	0	0	0	2-3	210
16	0	0	0	0	0	0	0	2-3	210

15.5 Shoreline clean-up decision guides

A number of shoreline types are found within the EMBA associated with Bedout Multi-Well Drilling activities, including:

+ rocky shorelines
+ sandy beaches
+ intertidal platforms
+ shallow sub-tidal soft sediments
+ mangroves.

The shoreline types are amenable in varying degrees to clean-up methods depending upon the type of hydrocarbon spilt. To assist with planning purposes, guidance for the selection of appropriate shoreline response strategies based on shoreline sensitivities is provided within **Appendix M**.

Operational guidelines for shoreline response activities including worksite preparation, manual and mechanical oil removal and vessel access for remote shorelines are included in **Appendix N**.

The DoT Oil Spill Contingency Plans (2015) also provides guidance on shoreline clean-up techniques.

15.6 Environmental performance

Table 15-7 indicates the environmental performance outcomes, controls and performance standards for this response strategy.

Table 15-7: Environmental performance – shoreline clean-up

Environmental Performance Outcome	Implement shoreline clean-up tactics to remove stranded hydrocarbons from shorelines in order to reduce impact on coastal protection priorities and facilitate habitat recovery		
Response Strategy	**Control Measures**	**Performance Standards**	**Measurement Criteria**
Shoreline Clean-Up	**Response Preparedness**		
	Access to shoreline clean-up equipment and personnel through AMOSC, AMSA National Plan, OSRL and TRG.	Maintenance of access to shoreline clean-up equipment and personnel through AMOSC, AMSA National Plan, OSRL and TRG throughout activity as per **Table 15-3**.	MoU for access to National Plan resources through AMSA.
			AMOSC Participating Member Contract.
			OSRL Associate Member Contract.
			TRG arrangements
	Maintenance of MSAs with multiple vessel providers.	Santos maintains MSAs with multiple vessel providers.	MSAs with multiple vessel providers.

Environmental Performance Outcome	Implement shoreline clean-up tactics to remove stranded hydrocarbons from shorelines in order to reduce impact on coastal protection priorities and facilitate habitat recovery		
Response Strategy	**Control Measures**	**Performance Standards**	**Measurement Criteria**
	Vessels for offshore island response.	Maintenance of vessel specification for resource transfer for offshore island response.	Vessel specification.
	Labour hire contract.	Maintenance of contract with labour hire provider.	Contract.
	The performance standards for TRP’s are found in **Section 8.3.**		
	Response Implementation		
	Mobilisation of minimum requirements for initial response operations.	Minimum requirements mobilised in accordance with **Table 15-4** unless directed otherwise by DoT.	Incident log.
	Response requirements for extended operations.	If required mobilisation of the required number of shoreline teams throughout the release to meet the need specified in **Table 15-5** and **Table 15-6.**	Incident log.
	Just-In-Time training	Training providers and personnel providers contacted during week 1one to initiate training	Incident Log
	Shoreline Clean-Up Plan.	Santos IMT to confirm protection priorities in consultation with DoT.	IAP. Incident Log.
		Prepare operational NEBA to determine if shoreline clean-up activities are likely to result in a net environmental benefit.	Records indicate operational NEBA completed prior to shoreline clean-up activities commencing.
		Ensure operational NEBA considers waste management, to ensure environmental benefit outweighs the environmental impact of strategy implementation which may include secondary contamination.	Incident Log. IAP.
		IAP Shoreline Clean-up Sub-plan developed to provide oversight and management of shoreline clean-up operation.	Records indicate IAP Shoreline Clean-up Sub-plan prepared prior to shoreline

Environmental Performance Outcome	Implement shoreline clean-up tactics to remove stranded hydrocarbons from shorelines in order to reduce impact on coastal protection priorities and facilitate habitat recovery		
Response Strategy	Control Measures	Performance Standards	Measurement Criteria
			clean-up operations commencing.
		Clean-up strategies will be implemented under the direction of DoT as the HMA.	Incident Log.
		Santos will make available AMOSC Core Group Responders for shoreline clean-up team positions to the Control Agency.	Incident Log.
		Santos will make available to the Control Agency equipment from Santos, AMOSC and OSRL stockpiles.	Incident Log.
		NEBA undertaken every operational period by the relevant Control Agency to determine if response strategy is having a net environmental benefit. NEBA included in development of following period Incident Action Plan.	IAP/Incident Log.
	Prioritise use of existing roads and tracks.	Unless directed otherwise by the designated Control Agency (i.e., DoT) access plans for shoreline operations will prioritise use of existing roads and tracks.	IAP demonstrates requirement is met.
	Soil profile assessment prior to earthworks.	Unless directed otherwise by the designated Control Agency (i.e., DoT) a soil profile assessment is conducted prior to earthworks.	Documented in IAP and Incident Log.
	Pre-cleaning and inspection of equipment (quarantine).	Vehicles and equipment provided by Santos are verified as clean and invasive species free prior to deployment to offshore islands.	Documented in IAP and Incident Log.
	Use of Heritage Adviser if spill response activities overlap with potential areas of cultural significance.	Unless directed otherwise by the designated Control Agency (i.e., DoT) a Heritage Adviser is consulted if shoreline operations overlap with areas of cultural significance.	Documented in IAP and Incident Log.
	Select temporary base camps in consultation with DoT and DBCA.	Any establishment of forward staging areas at shoreline areas done under direction or in consultation with DoT and DBCA.	Documented in IAP and Incident Log.

Environmental Performance Outcome	Implement shoreline clean-up tactics to remove stranded hydrocarbons from shorelines in order to reduce impact on coastal protection priorities and facilitate habitat recovery		
Response Strategy	**Control Measures**	**Performance Standards**	**Measurement Criteria**
	OSR Team Leader assessment/selection of vehicle appropriate to shoreline conditions.	OSR Team Leader assess/select vehicles appropriate to shoreline conditions	IAP demonstrates requirement is met.
	Establish demarcation zones for vehicle and personnel movement considering sensitive vegetation, bird nesting/ roosting areas and turtle nesting habitat.	Unless directed otherwise by the designated Control Agency (i.e., DoT) demarcation zones are mapped out in sensitive habitat areas.	IAP demonstrates requirement is met.
	Operational restriction of vehicle and personnel movement to limit erosion and compaction.	Unless directed otherwise by the designated Control Agency (i.e., DoT) action plans for shoreline operations include operational restrictions on vehicle and personnel movement.	IAP demonstrates requirement is met.
	Stakeholder consultation.	Consultation is undertaken with relevant stakeholders prior to deployment of resources to townships and marine/coastal areas.	Consultation records

16 Oiled Wildlife Response Plan

Note: DoT is the Control Agency and DBCA is the Jurisdictional Authority for oiled wildlife response within State waters. Santos is the Control Agency for oiled wildlife response within Commonwealth waters.

Table 16-1: Oiled wildlife response – environmental performance outcome, initiation criteria and termination criteria

Environmental Performance Outcome	Implement tactics in accordance with the WA Oiled Wildlife Response Plan to prevent or reduce impacts, and to humanely treat, house, and release or euthanise wildlife	
Initiation criteria	Operational monitoring shows that wildlife is contacted or is predicted to be contacted by a spill	
Applicable hydrocarbons	**Caley Condensate**	**MDO**
	✓	✓
Termination criteria	+ Oiling of wildlife has not been observed over a 48-hour period, and + Oiled wildlife has been successfully rehabilitated, and + Agreement is reached with Jurisdictional Authorities and stakeholders to terminate the incident response	

16.1 Overview

The short-term effects of hydrocarbons on wildlife may be direct such as the external impacts from coating or internal effects from ingestion and inhalation. Oiled wildlife response (OWR) includes wildlife surveillance/reconnaissance, wildlife hazing, pre-emptive capture and the capture, cleaning, treatment, and rehabilitation of animals that have been oiled. In addition, it includes the collection, post-mortem examination, and disposal of deceased animals that have succumbed to the effects of oiling.

Long-term effects of a spill on wildlife may be associated with loss/degradation of habitat, impacts to food sources, and impacts to reproduction. An assessment of such impacts is covered under scientific monitoring (**Section 18**).

Table 16-2 provides guidance on the designated Control Agency and Jurisdictional Authority for Commonwealth and State/Territory waters for OWR. For a petroleum activity spill in Commonwealth and Territory waters, Santos acts as the Control Agency and will be responsible for the wildlife response.

If a spill occurs in WA State waters or enters State waters, DBCA is the Jurisdictional Authority for wildlife, and for Level 2/3 spills, will also lead the oiled wildlife response under the control of the Department of Transport (DoT). For Level 1 spills, Santos will be the Control Agency, including for wildlife response. It is however also an expectation that for Level 2/3 petroleum activity spills, Santos will conduct the initial first-strike response actions for wildlife and continue to manage those operations until DBCA is activated as the lead agency for wildlife response and able to take over. Once DBCA takes over, Santos will act as a support organisation.

The key plan for OWR in WA is the WA Oiled Wildlife Response Plan (WAOWRP). The WAOWRP has been developed by DBCA and AMOSC, on behalf of the petroleum industry, and DBCA to define the minimum standards for OWR in WA as a sub-plan to the State Hazard: SHP-MEE. The WAOWRP can also be used for guidance to OWR in Commonwealth waters adjacent to State waters, noting that OWR requirements in State waters are expected to be greater. The Pilbara Region OWRP and Kimberley Region OWRP, sit under the WAOWRP and provides operational guidance to respond to injured and oiled wildlife in the Pilbara and Kimberley regions and cover the area potentially contacted by a spill from Bedout Multi-Well Drilling activities.

In Commonwealth Waters, Santos is the control agency (including OWR) for oil spills emanating from a petroleum activity, and the Santos Oiled Wildlife Framework Plan (SO-91-BI-20014) provides guidance for a Santos lead response.

Table 16-2: Jurisdictional and control agencies for oiled wildlife response

Jurisdictional boundary	Spill source	Jurisdictional authority for OWR	Control agency		Relevant Documentation
			Level 1	Level 2/3	
Commonwealth waters (three to 200 nautical miles from territorial/state sea baseline)	Vessel	Department of Agriculture, Water and the Environment (DAWE)	AMSA		Western Australian Oiled Wildlife Plan (WAOWRP)
	Petroleum activities		Titleholder		
Western Australian (WA) state waters (State waters to three nautical miles and some areas around offshore atolls and islands)	Vessel	Department of Biodiversity, Conservation and Attractions (DBCA)	WA DoT[23]		
	Petroleum activities	WA DoT	Titleholder	WA DoT	

16.2 Wildlife response level

The credible spill scenarios for the Bedout multi-well drilling activities show significant shoreline contact (refer to **Section 6.3** and **Section 6.4**), with certain locations likely to have significant wildlife aggregations. There is therefore potential for large numbers of wildlife to be impacted by a spill requiring a Level 6 wildlife response, as defined in the WAOWRP (2014) (**Table 16-3**).

[23] If an OWR is required in WA State waters, the DBCA is responsible for the administration of the Western Australian Oiled Wildlife Response Plan (WAOWRP) under the direction of the DoT.

Table 16-3: Indicative oiled wildlife response level (adapted from Western Australian Oiled Wildlife Response Plan, 2014)

OWR Level	**Indicative personnel numbers**	**Indicative duration**	**Indicative number of birds** (non-threatened species)	**Indicative number of birds** (threatened species)	**Turtles** (hatchlings, juveniles, adults)	**Cetaceans**	**Pinnipeds**	**Dugongs**
Level 1	6	<3 days	1–2/day <5 total	None	None	None	None	None
Level 2	26	>4–14 days	1–5/day <20 total	None	<20 hatchlings No juv./ adults	None	None	None
Level 3	59	>4–14 days	5–10/day	1–5/day <10 total	<5 juv./ adults <50 hatchlings	None	<5	None
Level 4	77	>4–14 days	5–10/day <200 total	5–10/day	<20 juv./ adults <500 hatchlings	<5, or known habitats affected	5–50	Habitat affected only
Level 5	116	>4–14 days	10–100/ day >200 total	10–50/day	>20 juv./ adults >500 hatchlings	<5 dolphins	>50	Dugongs oiled
Level 6	122	>4–14 days	>100/day	10–50/day	>20 juv./ adults >500 hatchlings	>5 dolphins	>50	Dugongs oiled

16.3 Implementation guidance

Table 16-4 provides guidance to the IMT on the actions and responsibilities that should be considered when implementing an oiled wildlife first-strike plan. This will enable an initial assessment of the OWR response level, initiation of a Wildlife Division where Santos is the control agency and as outlined in the Santos Oiled Wildlife Framework Plan (SO-91-BI-20014). The Santos Oiled Wildlife Framework Plan (SO-91-BI-20014) will be referred to for guidance for coordinating an OWR in association with the WAOWRP. Mobilisation times for the minimum resources that are required to commence initial oiled wildlife operations are listed in **Table 16-5**. Information on resource capability for this strategy and the on-going response is shown in **Table 16-6.**

Wildlife surveillance/reconnaissance is a critical component of an oiled wildlife first-strike response. Refer to the Santos Oiled Wildlife Framework Plan (SO-91-BI-20014), Section 7.3, for a list of the wildlife reconnaissance aims and objectives, tactics, species and lifecycle stages to consider when developing a wildlife reconnaissance plan. Wildlife reconnaissance should be undertaken in close consultation with personnel undertaking relevant monitor and evaluate activities.

As part of the wildlife first-strike response an early assessment of the level of wildlife impact (**Table 16-3**) must be made (noting this may change over time) for the timely mobilisation of adequate resources. The information gathered from wildlife reconnaissance and all relevant pre-existing wildlife data/information should be used to inform decisions and aid the development of the Wildlife portion of the IAP (refer to the Santos Oiled Wildlife Framework Plan [SO-91-BI-20014], Section 7.1).

Table 16-4: Implementation guidance – oiled wildlife first strike response

Action		Consideration	Responsibility	Complete
Initial wildlife assessment and notifications				
Initial Actions	Personnel conducting monitor and evaluate activities shall report wildlife sightings in or near the spill trajectory (including those contacted with hydrocarbons or at risk of contact) and report them to the IMT within two hours of detection.	Record all reports of wildlife potentially impacted and impacted by spill. Record reports on: + location + access + number + species + condition of impacted animals (if available).	Surveillance personnel	❑
	+ If wildlife is sighted and are at risk of contact (or have been contacted), initiate wildlife response by notifying AMOSC Duty Manager, and + if in State waters also notify DCBA State Duty Officer (who will then activate their respective Oiled Wildlife Advisers).	Obtain approval from IC prior to activating AMOSC Oiled Wildlife Adviser (OWA). DoT will be the Control Agency for OWR in State waters.	Environmental Unit Leader	❑
	Notify Department of Agriculture, Water and the Environment if there is a risk of death or injury to a protected species (including Matters of National Environmental Significance [MNES]).	Refer to **Table 7-1** for reporting requirements. A list of MNES is provided in the Existing Environment section of the EP (Section 3).	Environmental Team Leader	❑
	Review all wildlife reports from surveillance or opportunistic activities and contact personnel who made the reports (if possible) to confirm information collected.		Environmental Team Leader Wildlife Response Branch Director	❑

Action		Consideration	Responsibility	Complete
	Use information from initial assessments to prepare an Operational NEBA. Use this information to help determine: + initial OWR Response Level (1 to 6), refer to **Table 16-3** + for Level 2/3 wildlife incidents where Santos is the control Agency, a Wildlife Division should be established (refer to the Santos Oiled Wildlife Framework Plan [SO-91-BI-20014]) + if OWR activities are likely to result in a net environmental benefit.	Oiled wildlife response activities such as hazing and pre-emptive capture can cause additional stress and mortality on individuals than oil pollution alone. The Environmental Team Leader and Wildlife Division Coordinator will determine via an Operational NEBA whether strategies such as hazing/pre-emptive capture will result in a net environmental benefit. This may be done in consultation with the DCBA and AMOSC Oiled Wildlife Advisers and any Subject Matter Experts as relevant (if available, but an Operational NEBA should not be delayed if they are not immediately available).	Environmental Team Leader If Wildlife Division activated: Wildlife Division Coordinator Wildlife Branch Director	❑
	Prepare a Wildlife Plan for inclusion in the IAP.	In State Waters preparation of the Santos Wildlife Plan would occur in consultation with DBCA and would only be in-effect until DBCA took over the response (thereafter Santos would become a support organisation) Refer to the Santos Oiled Wildlife Framework Plan (SO-91-BI-20014), **Section 7.1.**	Environmental Team Leader If Wildlife Division activated: Wildlife Division Coordinator Wildlife Branch Director	❑
Mobilisation of wildlife resources				
Determine resources required to undertake wildlife reconnaissance and provide list to Logistics Section.		Confirm best reconnaissance platform (e.g., vessel, aerial, shoreline). Consider ability to share resources (e.g., Monitor and Evaluate activities, Scientific Monitoring).	AMOSC OWA If Wildlife Division activated: + Wildlife Division Coordinator + Wildlife Reconnaissance Officer	❑
Determine resources required to implement the Wildlife Plan			AMOSC OWA	❑

Action	Consideration	Responsibility	Complete
		If Wildlife Division activated: + Wildlife Division Coordinator or delegate	
Determine number of Oiled Wildlife Responders and IMT Wildlife related positions required based on the likely number of oiled wildlife and arrange access to resources via AMOSC and DBCA.	Consider need for veterinary care.	AMOSC OWA Logistics Team Leader If Wildlife Division activated: + Wildlife Division Coordinator State waters: + DBCA OWA	❑
Commence mobilisation of equipment (including adequate PPE) and personnel to required location/s.		Logistics Team Leader	❑
Contact OSRL to activate Sea Alarm if additional support is likely to be required to sustain an ongoing OWR.		Environmental Team Leader	❑

Table 16-5: Oiled wildlife response – first strike response timeline

Task	Time from oiled wildlife contact (predicted or observed)
IMT notifies regulatory authorities and AMOSC of oiled wildlife / potential for contact	<2 hours
Mobilise Santos personnel for oiled wildlife reconnaissance **this will be already occurring through Aerial Observer mobilisation and Shoreline Assessment Team mobilisation**	<24 hours
Mobilisation of AMOSC oiled wildlife equipment and industry OWR team to forward staging area	<48 hours
Minimum Resource Requirements	
The requirements for oiled wildlife response will be situation specific and dependent upon reconnaissance reports. Indicative minimum resource requirements below align with personnel requirements for a Level 1 response as per the WAOWRP: + Six trained industry oiled wildlife response team personnel (AMOSC staff & contractors/ AMOSC Industry OWR group) + One AMOSC OWR treatment container + One AMOSC Oiled Wildlife Deterrence Kit	

16.4 Oiled wildlife resourcing requirements

Deterministic run #5 (surface LOWC**, Figure 10-3**) was selected to guide resourcing requirements, based on it being the run with the earliest arrival times ashore (**Table 10-40)**. Shoreline accumulation above 10g/m^2 commenced by day 2 at Bedout Island, followed by Port Hedland-Eighty Mile Beach on day 3, with all other contacts > 63 days (**Table 10-40**) (GHD, 2021b).

Santos is required to provide the first strike OWR actions until DBCA takes over, whereby, Santos then becomes the support organisation. The Santos Oiled Wildlife Framework Plan (SO-91-BI-20014) provides guidance for coordinating an OWR when Santos is the Control Agency/providing the first strike OWR/ or acting as a support organisation when DBCA is the lead organisation.

The first strike response actions for this scenario would focus on Bedout Island and Port Hedland-Eighty Mile and would initially consist of reconnaissance measures to assess the extent of wildlife impact (wildlife response level) and formulate the Wildlife Plan (in consultation with DBCA) for inclusion in the IAP, and until DBCA can take-over. Santos has staff that have had OWR training and would be capable of formulating the initial Wildlife Plan in consultation with DBCA and the AMOSC OWA. The initial Wildlife Plan may include the following strategies:

+ On-going wildlife targeted reconnaissance and monitoring
+ Preventative actions such as hazing (scaring wildlife away from the oil) in consultation with DBCA, SMEs and with permit approval
+ Wildlife rescue- capture of oiled wildlife
+ Field processing- establishment of field site(s), tagging and initiation of individual wildlife paper-trail, triage, first aid, transport to a primary care facility

+ Collection, appropriate storage, and transport of wildlife carcasses
+ Health and safety

Further information relating to the development of the Santos Wildlife Plan (for inclusion in the IAP) is included in the Santos Oiled Wildlife Framework Plan (SO-91-BI-20014). The Santos Oiled Wildlife Framework Plan (SO-91-BI-20014), which is consistent with the WAOWRP, also includes implementation plans for each OWR strategy.

Santos has access to aircraft that could be used for wildlife reconnaissance within hours of a spill (**Table 16-6**). This would be followed by further access to vessels and Santos personnel trained in OWR that could be mobilised within 24 hours for vessel and wildlife shoreline reconnaissance, as outlined in **Table 16-6**, demonstrating Santos' ability to mount a swift response that could also be sustained as long as required.

Santos has the capability to set up oiled wildlife field facilities within 3-4 days of a spill through access to AMOSC equipment (**Table 16-6**), and equipment purchased at the time of a spill. For locations such as Bedout Island it maybe more feasible to set up a vessel-based field facility by placing an OWR container/mobile washing facility on the deck of a utility vessel. At the time of a spill, and if required by DBCA, Santos could source experienced wildlife handlers, wildlife veterinarians, and vet nurses to initiate rescue and field processing. Santos could also arrange the transport required to move wildlife from the field to a primary care facility. For further discussion relating to access to offshore islands and mainland locations refer to **Section 15.4.1.1** and **Sections 15.4.1.2**, respectively. Santos will not only provide the initial first strike OWR but will act as a support organisation for the on-going OWR once DBCA takes over, mainly through access to the response capability outlined in Table 16-6 and further resourcing as dictated by DBCA at the time of a spill. Previous oiled wildlife events have demonstrated that the number of wildlife impacted will rise over time and it is unlikely that a large scale-spill event will start as a Level 6 response but instead escalate to one over time. The indicative personnel required for a Level 6 response is 122 personnel (WAOWRP), however depending on the number and species impacted may require many more. At the height of the Rena OWR in 2011, approximately 250 personnel were involved in daily wildlife operations, including field staff, the oiled wildlife facility staff, and the numerous support staff required to assist with the management, logistics, planning and human resourcing (Massey University, 2016).

Santos' current arrangements could support a large scale OWR (requiring > 122 personnel) mainly through support staff, such as, non-technical wildlife support roles (management, logistics, planning, human resourcing, transporter, cleaners, trades persons, security etc). These roles could be filled by Santos personnel and labour hire agencies that can provide workers that undergo an induction and basic training. In addition, many of the roles required for an OWR require technical expertise and Santos will need to activate OWR arrangements with AMOSC and OSRL to fulfil roles, as well as make contractor arrangements for accessing skilled wildlife personnel at the time of a spill.

Santos

Table 16-6 Oiled wildlife response capability

Relevant section in the Santos Oiled Wildlife Framework Plan (SO-91-BI-20014)	Considerations	Equipment/Personnel	Location	Mobilisation Timeframe
Reconnaissance				
Section 7.3	Identify opportunities to create synergies with surveys required for Monitor and Evaluate and Scientific Monitoring activities	Rotary Wing Aircraft & flight Crew	Karratha Learmonth Onslow	Wheels up within 1 hour for Emergency Response.
		Drones and pilots	Local WA hire companies	1-2 days
		Contracted vessels and vessels of opportunity Santos Contracted Vessel Providers Vessels of opportunity identified through AIS Vessel Tracking.	Vessels mobilised from Exmouth, Dampier, Varanus Island or offshore location. Locations verified through AIS Vessel Tracking Software.	Pending availability and location. Expected within 12 hours.
		Aerial surveillance crew Santos staff AMOSC staff AMOSC Core Group personnel available Additional trained industry mutual aid personnel available	Perth and Varanus Island (VI) (Santos aerial observers) Australia wide	Santos trained personnel - next day mobilisation to airbase <24 hours
Preventative actions- hazing				

Relevant section in the Santos Oiled Wildlife Framework Plan (SO-91-BI-20014)	Considerations	Equipment/Personnel	Location	Mobilisation Timeframe
Section 4.3.1 Section 7.4.1	Mainly effective for bird species Requires DBCA permit/licence approval	3 x AMOSC Wildlife fauna hazing and exclusion kit 1x AMOSC Breco buoy	2 x Fremantle, 1 x Geelong Fremantle	48 hours
Rescue and field processing				
Section 4.3.1 Section 7.5	Wildlife handling and first aid should only be done by persons with appropriate skills and experience or under the direction of DBCA	4 x AMOSC OWR Box Kits (basic medical supplies, cleaning/rehab, PPE)	1 x Fremantle, 1 x Exmouth, 1 x Broome, 1 x Geelong	48 hours
		50 % of OSRL Search and rescue kits (including field first aid) (approximately 2 available)	1 x Singapore, 1 x Bahrain, 1 x Fort Lauderdale, 2 x Southampton	Location dependent
Transport				
Section 7.5	Transport of oiled animals by aeroplane or helicopter may be restricted due to Civil Aviation Safety Authority (CASA) regulations; such transport will depend on the level of oiling remaining on animals. Therefore, consultation with the air transport provider must take place before transport to ensure the safest and most efficient means	Contracted vessels and vessels of opportunity Santos Contracted Vessel Providers Vessels of opportunity identified through AIS Vessel Tracking.	Vessels mobilised from Exmouth, Dampier, Varanus Island or offshore location. Locations verified through AIS Vessel Tracking Software.	Pending availability and location. Expected within 12 hours.
OWR facility				
Section 4.3.1 Section 7.5.2	OWR container could be placed on the deck of a suitably sized vessel for field processing in remote	OWR container/mobile washing facility 2 x AMOSC	AMOSC – 1 x Fremantle, 1 x Geelong	Location dependent

Relevant section in the Santos Oiled Wildlife Framework Plan (SO-91-BI-20014)	Considerations	Equipment/Personnel	Location	Mobilisation Timeframe
Section 8	locations (benefits associated with temperature regulation and access to water and electricity) An OWR container on a vessel could also be used to aide transport form off-shore islands	4 x AMSA	AMSA 1 x Dampier, 1 x Darwin, 1 x Devonport, 1 x Townsville	
		AMOSC call off contract with DWYERTech NZ – a facilities management group	New Zealand	Availability within 24 hrs of call-off
Personnel				
Section 4.3	Untrained personnel would receive an induction, on-the-job training and work under the supervision of an experienced supervisor	Santos provides OWR training to staff, and to-date, approximately 20 personnel have received OWR training.	Perth and Varanus Island	< 24 hours
		Santos maintains labour hire arrangements for access to untrained personnel		
		1x AMOSC Oiled Wildlife Advisor	Victoria, Australia	<48 hours
		18 x AMOSC OWR Industry Team		<48 hours
		AMOSC MOU with Phillip Island National Park (PINP) (best-endeavours availability)	Victoria, Australia	Best-endeavour availability

Relevant section in the Santos Oiled Wildlife Framework Plan (SO-91-BI-20014)	Considerations	Equipment/Personnel	Location	Mobilisation Timeframe
Section 4.4	Sea Alarm staff act in a technical advisory role and do not engage in hands-on OWR activities but work impartially with all parties (titleholder, local authorities, mobilised experts and local experts, and response groups), aiming to maximise the effectiveness of the wildlife response.	Access to 24/7 technical advice (remote or on-site) from the Sea Alarm Foundation	Belgium	Upon notification able to provide remote advice and option to mobilise a Sea Alarm Technical Advisor on-site during an incident

16.5 Environmental performance

Table 16-7 indicates the environmental performance outcomes, controls and performance standards for this response strategy.

Table 16-7: Environmental performance – oiled wildlife response

Environmental Performance Outcome	Implement tactics in accordance with the WAOWRP to prevent or reduce impacts, and to humanely treat, house, and release or euthanise wildlife		
Response Strategy	**Control Measures**	**Performance Standards**	**Measurement Criteria**
Oiled Wildlife Response	**Response preparedness**		
	Maintenance of access to oiled wildlife response equipment and personnel	Maintenance of access to oiled wildlife response equipment and personnel through AMOSC, AMSA National Plan and OSRL throughout activity as per **Table 16.5.**	MoU for access to National Plan resources through AMSA
			AMOSC Participating Member Contract.
			OSRL Associate Member Contract.
	Santos Oiled Wildlife Framework Plan (SO-91-BI-20014)	Santos Oiled Wildlife Response Framework provides guidance for coordinating an OWR when Santos is the Control Agency and outlines Santos' response arrangements	Santos Wildlife Framework Plan
	Labour hire contract	Maintenance of contract with labour hire provider	Contract
	Labour hire onboarding procedure (for low skilled shoreline clean-up personnel)	Development of onboarding procedure for oil spill response labour hire	Onboarding procedure
	Maintain Santos personnel trained on OWR and positioned at Perth and VI	Santos personnel trained in OWR	Training records
	Response Implementation		
	Mobilisation of minimum requirements for initial response operations	Minimum requirements mobilised in accordance with **Table 16-5** unless directed otherwise by DoT/ DBCA.	Incident log
	OWR managed in accordance with the Santos Oiled Wildlife	Prepare operational NEBA to help classify OWR level	Records indicate operational NEBA

	Framework Plan (SO-91-BI-20014) in Commonwealth waters and the WAOWRP in State waters	and determine if OWR activities are likely to result in a net environmental benefit (particularly in relation to hazing/pre-emptive capture)	completed prior to OWR operations commencing
		Wildlife Plan developed and included in the IAP to provide oversight and management of OWR operation	Records indicate IAP Wildlife Plan prepared prior to OWR operations commencing

17 Waste Management Plan

Table 17-1 provides the environmental performance outcome, initiation criteria and termination criteria for this strategy.

Table 17-1: Waste management – environmental performance outcome, initiation criteria and termination criteria

Environmental Performance Outcome	Comply with waste treatment, transport and disposal regulations and prevent secondary contamination while reducing, reusing and recycling waste where possible	
Initiation criteria	Response activities that will be generating waste have been initiated	
Applicable hydrocarbons	**Caley Condensate**	**MDO**
	✓	✓
Termination criteria	+ All waste generated from the oil spill response has been stored, transported and disposed as per the regulatory requirements, and + Agreement is reached with Jurisdictional Authorities to terminate the response	

17.1 Overview

The implementation of some spill response strategies will generate waste solid and liquid waste that will require rapid management, storage, transport and disposal. It is important that waste is collected and removed efficiently to ensure waste management does not create a bottleneck in response operations.

The type and amount of waste generated during a spill response will vary depending on the spill type/characteristics, volume released, and response strategies implemented. To account for this potential variability, waste management (including handling and capacity) needs to be scalable to allow a continuous response to be maintained.

Where Santos is the Control Agency, or at the request of the designated Control Agency, Santos will engage its contracted WSP to provide sufficient waste receptacles to store collected waste and manage oily waste collection, transport and disposal associated with spill response activities. The WSP will arrange for all personnel, equipment and vehicles to carry out these activities from nominated collection points to the final disposal points. Santos' Oil Pollution Waste Management Plan (QE-91-IF-10053) provides detailed guidance to the WSP in the event of a spill.

Where DoT is the Control Agency, Santos will provide a Facilities Support Officer to the DoT IMT Logistics Unit to support the DoT IMT in coordinating waste management services.

17.2 Implementation guidance

Table 17-2 provides guidance to the IMT on the actions and responsibilities that should be considered when selecting this strategy. **Table 17-3** provides a list of resources that may be used to implement this strategy The Incident Commander is ultimately responsible for implementing the response, and may therefore determine that some tasks be varied, should not be implemented or be reassigned.

Table 17-2: Implementation guidance – waste management

	Action	Consideration	Responsibility	Complete
Initial Actions	Contact WSP (Primary or Secondary Contact Person) and activate Waste Project Manager.	Refer to Incident Response Contacts Directory (SO-00-ZF-00025.020) for contact details.	Logistics Section Chief	❑
	Based on operational modelling and applicable response strategies communicate the type and quantity of empty liquid and solid waste receptacles required to support planned operations.	It is better to overestimate volumes and scale back resources then to underestimate waste volumes.	Logistics Section Chief Planning Section Chief	❑
	Using most recent monitor and evaluate data and any existing and future response activities, determine most suitable locations for waste receptacles to be positioned and for temporary storage locations to be established.	Consideration would be given to positioning receptacles and locating temporary storage sites to ensure secondary contamination of sensitive receptors is avoided or minimised. The approval of temporary storage sites would be given through Department of Water and Environmental Regulation (DWER).	Logistics Section Chief Planning Section Chief Environment Unit Leader	❑
	For each receival location indicate the anticipated: + material types + material generation rates + material generation quantities + commencement date/time + anticipated clean-up duration + receptacle types required + logistical support requirements + any approvals required from Ports, Local Governments, Landowners, State Government Agencies (Refer to Oil Pollution Waste Management Plan (QE-91-IF-10053)).	Consider facilities for waste segregation at source.	Logistics Section Chief Planning Section Chief	❑

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Action		Consideration	Responsibility	Complete
	Once the above information is obtained, ensure all necessary waste management information is included in the IAP.	Waste management should be conducted in accordance with Santos' Oil Pollution Waste Management Plan (QE-91-IF-10053); and where relevant, the DoT Waste Management Guidelines, and the respective Port, Port Operator and/or Ship Owner's waste management plan.	Logistics Section Chief (or delegate) Planning Section Chief Deputy Waste Management Coordinator (DoT IMT) WSP Location Responsible Person or Operations Supervisor	❑
	Mobilise waste management resources and services to agreed priority locations.		WSP Location Responsible Person or Operations Supervisor Logistics Section Chief (or delegate) Deputy Waste Management Coordinator (DoT IMT)	❑
Ongoing Actions	Provide ongoing point of contact between IMT and WSP.	If DoT is the Control Agency, the Facilities Support Officer shall be the point of contact between DoT and the WSP.	Deputy Waste Management Coordinator (DoT IMT) Logistics Section Chief	❑
	Ensure all waste handling, transport and disposal practices comply with legislative requirements.	Alert Logistics Section Chief (or delegate)/Deputy Logistics Officer (if DoT is the Control Agency) if any non-compliance is anticipated or detected. Site clean-up, removal and disposal of response waste should be conducted in accordance with Santos' Oil Pollution Waste Management Plan (QE-91-IF-10053); and where relevant, the DoT Waste Management Guidelines, and the respective Port, Port Operator and/or Ship Owner's waste management plan.	WSP Location Responsible Person or Operations Supervisor	❑

Action		Consideration	Responsibility	Complete
	Ensure records are maintained for all waste management activities, including but not limited to: + waste movements (including types of receptacles, receival points, temporary storage points, final disposal locations) + volumes generated at each site (including total volume and generation rates) + types of waste generated at each site + approvals obtained (as required).		WSP Location Responsible Person or Operations Supervisor	❑

17.3 Waste approvals

Site clean-up, removal and disposal of response waste should be conducted in accordance with Santos' Oil Pollution Waste Management Plan (QE-91-IF-10053); and where relevant, the DoT Waste Management Guidelines, and the respective Port, Port Operator and/or Ship Owner's waste management plan. In addition, regulatory approval may be required for the temporary storage, transport, disposal and treatment of waste, through DWER. DWER administers the *Environmental Protection Act 1986* (WA) and is the relevant Regulatory Authority for waste management approvals. If required, DoT may establish an Operational Area Support Group, as defined in the State Hazard: SHP-MEE, to request support from relevant WA Government Agencies, including DWER, during a State waters spill response. The Santos Oil Pollution Waste Management Plan (QE-91-IF-10053) provides detail on the regulatory requirements for each port/location likely to be used for waste management during any spill response operation associated with Santos' activities.

17.4 Waste service provider capability

Detailed guidance on Santos' WSP responsibilities for spill response waste management is provided in the Santos Oil Pollution Waste Management Plan (QE-91-IF-10053).

Key responsibilities of the WSP include:

+ Maintain emergency response standby preparedness arrangements, including:
  - Have access to personnel, equipment and vehicles required for a first strike and ongoing response commensurate to Santos worse case spill and waste requirements.
  - Provide primary and secondary contact details for activation of spill response waste management services.
  - Have suitably trained personnel for completing critical tasks in spill response waste management.
  - Participate in exercises undertaken by Santos.
+ Maintain ability to assist in the Control Agency's IAP and Waste Management Sub-plan process as required.
+ Mobilise resources to waste collection points identified by the Control Agency.
+ Ensure waste handling, transport and disposal practices meet legislative requirements.
+ Keep auditable records of waste streams from collection points to final disposal points.
+ Provide regular progress reporting to the Control Agency IMT and a final report relating to quantities and destinations of collected waste.
+ Provide a project manager responsible for the rollout of spill response resources to meet spill response waste management objectives.
+ Provide location -specific Operations Supervisor/s to handle on-site operational aspects (management of personnel and equipment, reporting, liaison with relevant field-based spill responders).

17.5 Waste management resources

Santos has access to capacity to deliver storage receptacles, remove, transport and dispose of all waste material from oil spill response activities to predetermined disposal points.

Table 17-3 provides waste service provider capability for waste removal and storage, which is in excess of the waste management requirements for spill response activities associated with this OPEP. The weekly removal capacity is 8,658 m^3 totalling 138,528 m^3 over the 16 weeks.

The maximum accumulation including bulking factor, further evaluated in shoreline clean-up in **Section 15.4** over 16 weeks is 30,023 m^3 as per **Table 15-6,** which is exceeded by the waste service provider total removal capacity of 138,528 m^3 specified in **Table 17-3**.

Liquid waste from containment and recovery operations over 16 weeks is 51,863 m^3 based on ~4,500 m^3 per week (further detailed in **Table 11-6).** This is exceeded by the waste service provider weekly liquid waste removal capacity of 5,250 m^3 at the port of reception (Dampier).

Table 17-3: North West Alliance vehicle and equipment availability

Plant and Equipment	No	Capacity	Functionality	Uses per week	Waste stored/shifted per week
Waste removal					
Oily waste					
Skip Lift Truck	12	Lift up to 15 Tonnes	Servicing of skip Bins	7	630
Front Lift Trucks	10	28 m3 Body	Servicing of Front lift Bins	7	784
Side Loading Truck	10	18 m3 Body	Servicing of MGB's	7	504
Hook Lift Truck	5	70 Tonne rated	Servicing of hook lift Bins	7	980
Flat Bed Truck	16	15 pallet spaces	Servicing of bins	7	840
Liquid oil					
Liquid waste tankers (triple 'road-train' configuration)	10	75 m^3	Collection of liquid waste at the port of reception (Dampier)	7	5,250
Waste storage					
Oily waste					
MGB's	500	240 litres	Mobile bins	2	48
Offshore 8 pack Lifting Cradle (MGB's)	2	16 x 240 litre MGB'S	Able to remove 16 x 240L MGB'S simultaneously	continuous	
Lidded Bins	6	1,100 litres	contain various waste streams	2	13
Front Lift Bins	50	3 m3	various waste streams	2	300
Front Lift Bins	25	4.5 m3	various waste streams	2	225
Offshore Rated Front Load Bins	100	3 m3	various waste streams	2	600
Offshore Rated Bins	45	7 m3	various waste streams	2	630
Marrell Skip Bins	60	6-9 m3	various waste streams	2	960
Hook Lift Bins	12	15-30 m3	various waste streams	25	6900
Forklift	4	4 tonne Forklift	All areas	continuous	
Weekly waste storage capacity					**9,628**

Plant and Equipment	No	Capacity	Functionality	Uses per week	Waste stored/shifted per week
Weekly waste removal capacity					**8,658**
Weekly liquid oil removal capacity					**5,250**

17.6 Environmental performance

Table 17-4 indicates the environmental performance outcomes, controls and performance standards for this response strategy.

Table 17-4: Environmental performance – waste management

Environmental Performance Outcome	Comply with waste treatment, transport and disposal regulations and prevent secondary contamination while reducing, reusing and recycling waste where possible		
Response Strategy	**Control Measures**	**Performance Standards**	**Measurement Criteria**
Waste Management	**Response preparedness**		
	Maintain access to waste management equipment, personnel, transport and disposal facilities	Maintain access to waste management equipment, personnel, transport and disposal facilities throughout activity	Contract with WSP for emergency response services
	Response Implementation		
	Implement Oil Pollution Waste Management Plan (QE-91-IF-10053)	WSP to appoint a Project Manager within 24 hours of activation	Incident Log
		Provision of liquid oil waste tanks for containment and recovery operations to deployment port, if requested, within 24 hours	Incident Log
		Provision of waste bins for oil and oily waste for shoreline clean-up operations to clean-up site or deployment port, if requested, within 24 hours	Incident Log
		WSP shall track all wastes from point of generation to final destination	Waste tracking records
		WSP to provide monthly waste management reports and more regular situation reports during the response until termination criteria are met	Waste reports

18 Scientific Monitoring Plan

Table 18-1: Scientific monitoring – environmental performance outcome, initiation criteria and termination criteria

Environmental Performance Outcome	Implement monitoring programs to assess and report on the impact, extent, severity, persistence and recovery of sensitive receptors contacted by a spill or affected by spill response	
Initiation criteria	Refer to individual Receptor SMPs – **Appendix O**	
Applicable hydrocarbons	**Caley Condensate**	**MDO**
	✓	✓
Termination criteria	Refer to individual SMPs – **Appendix O**	

Oil spill scientific monitoring is the principal tool for detecting and quantifying environmental impact and recovery to sensitive receptors from an oil spill. Santos is required to have an oil spill SMP in place for Petroleum activities in State and Commonwealth waters.

Santos will activate and implement scientific monitoring in State and Commonwealth waters for hydrocarbon spills in line with its SMPs unless directed otherwise by the relevant Control Agency/s.

18.1 Objectives

The overarching objective of Santos' SMPs is to provide guidance to staff, consultants and contractors in developing monitoring a monitoring program for detecting impacts and recovery to environmentally sensitive receptors contacted by a spill.

Receptor-specific SMPs have different objectives as outlined in **Appendix O**.

18.2 Scope

Santos will implement its SMPs, as applicable, for Bedout Multi-Well Drilling activity oil spills across both State and Commonwealth waters. In the event that control of scientific monitoring in State waters is taken over by DoT under advice from the State Environmental Scientific Coordinator, Santos will follow the direction of DoT and provide all necessary resources (monitoring personnel, equipment and planning) to assist as a Supporting Agency.

18.3 Relationship to operational monitoring

Operational monitoring (**Section 10**) is monitoring undertaken to obtain information which will provide situational awareness and assist in the planning and execution of the oil spill response.

Scientific monitoring activities have different objectives to Operational Monitoring**,** which influences the monitoring methods likely to be used, the degree of scientific rigour required to meet the monitoring objectives, and the scope of studies. Scientific monitoring may occur in parallel to operational monitoring and is typically conducted over a wider study area, extending beyond the spill footprint. It is also typically conducted over a longer time period, extending beyond the spill response.

Scientific monitoring is designed to provide data for short-term and longer-term environmental effects assessment. This is typically required to be quantitative in nature and appropriate for statistical analyses.

However, these two types of monitoring are related, and Operational Monitoring outputs typically inform the final design of the related SMP.

18.4 Scientific Monitoring Plans

Owing to the diverse nature of sensitive receptors that could be contacted by an oil spill and the different techniques and skillsets required to monitor impact and recovery to these receptors, there are a number of Oil Spill Scientific Monitoring Plans relevant to Bedout Multi-Well Drilling activities (**Table 18-2**). These are detailed further in **Appendix O**; each SMP has corresponding objectives, initiation/termination criteria, methodologies, baseline data sources and analysis and reporting requirements, noting that in a response controlled by DoT methodology, termination criteria and analysis/reporting requirements may differ.

Table 18-2: Oil spill scientific monitoring plans relevant to Bedout multi-well drilling activities

Study	Title
SMP1	Marine Water Quality
SMP2	Marine Sediment Quality
SMP3	Shorelines and Coastal Habitats – Sandy Beaches and Rocky Shores
SMP4	Shorelines and Coastal Habitats – Mangroves
SMP5	Shorelines and Coastal Habitats – Intertidal Mudflats
SMP6	Benthic Habitats
SMP7	Seabirds and Shorebirds
SMP8	Marine Mammals
SMP9	Marine Reptiles
SMP10	Seafood Quality
SMP11	Fish, Fisheries and Aquaculture
SMP12	Whale Sharks

18.5 Baseline monitoring

Baseline monitoring provides information on the condition of ecological receptors prior to, or spatially independent of (e.g. if used in control chart analyses), a spill event and is used for comparison with the post-impact scientific monitoring where required. This is particularly important for scientific monitoring where the ability to detect changes between pre-impact and post-impact conditions is necessary.

In the event of a spill to marine or coastal waters, reactive pre-impact monitoring should, where practicable, be implemented to gather additional data on the current state of the environment.

Santos periodically reviews the status, availability and suitability of existing baseline data sources related to key environmental sensitivities in its areas of operations. **Appendix Q** provides further information on Santos baseline data reviews and outlines a baseline date assessment conducted on high priority areas for scientific monitoring in the event of a Bedout Multi-Well Drilling oil spill.

18.6 Monitoring service providers

Oil Spill Scientific Monitoring will be conducted on behalf of Santos by a contracted monitoring service providers (MSPs) and applies to the implementation of SMPs 1 to 12 (**Table 18-2**). These services are provided by Astron Environmental Services (Astron) and primary sub-contractor (BMT).

For whale sharks, scientific monitoring of whale sharks (SMP12) along the Ningaloo Coast and north-west Australian coastline will be undertaken. Santos has historically and currently supports research on the behaviour, demography and migration patterns of whale sharks at Ningaloo Reef conducted by Australian Institute of Marine Science. In the event of a spill that could impact whale sharks, Santos will leverage off this long-term research program to assess potential impacts to whale sharks at, and migrating to-and-from, Ningaloo Reef. SMP12 is regarded as complementary to SMP8 which will detect potential impacts to whale sharks from visual surveys of whale sharks wherever they may occur in relation to a spill.

As per the Oil Spill Scientific Monitoring Standby and Response Manual (EA-00-RI-10162), Santos' MSP provides the following scientific monitoring services to Santos:

+ 24/7 monitoring support accessed through 24 hr call out number
+ provision of a suitably trained Monitoring Coordination Team including a Monitoring Coordinator, Monitoring Operations Officer, Planning and Logistics Officer and Safety Officer
+ provision of Technical Advisers and Field Teams (staff and contractors) for first strike deployments
+ maintenance of standby monitoring equipment
+ monthly personnel capability reports
+ provision and review of Scientific Monitoring Sub-plans
+ provision and review of Standby Service Manual (EA-00-RI-10162) and associated response activation forms
+ participation in audits, workshops, drills and exercise to facilitate readiness.

Appendix Q provides an overview of Santos' processes in place to provide assurance that its oil spill scientific monitoring arrangements for SMPs 1-12 are fit for purpose to meet the worst case first-strike monitoring requirements associated with the Bedout Multi-Well Drilling activities.

18.7 Activation

The SMP Activation Process is outlined in **Appendix P**. SMPs are activated as per the initiation criteria for each as outlined in **Appendix O**. The SMP Activation Form is available on the Santos Procedures Index and Environment Unit Leader folder.

The Santos Environment Unit Leader (ETL) with support from IMT Environment Team members is responsible for activating the primary MSP. The Santos Environment Team will assist the MSP Monitoring Coordination personnel and relevant Technical Advisers in defining the monitoring study design, monitoring locations and field methodologies based on Operational Monitoring information (e.g. spill modelling and aerial surveillance information), relative location of sensitive receptors to the spill and the timing of the spill with respect to seasonality of sensitive receptors.

This process will identify monitoring operational objectives and resourcing/ mobilisation requirements which the ETL will feed back to the IMT for approval. Mobilisation times for the minimum resources that are required to commence initial scientific monitoring operations are listed in **Table 18-3**.

In the event that a designated Control Agency takes command of scientific monitoring, Santos will follow the direction of the Control Agency providing planning and resourcing support through its MSPs as required.

Table 18-3: Scientific monitoring – first strike response timeline

<table>
<tr><th>Task</th><th>Time from activation of SMP</th></tr>
<tr><td>Santos IMT approve initial monitoring plan</td><td><24 hours</td></tr>
<tr><td>Santos to mobilise sampling platforms to deployment location</td><td><96 hours (72 hours from monitoring plan approval)</td></tr>
<tr><td>SMP teams and monitoring equipment mobilised to deployment locations</td><td><96 hours (72 hours from monitoring plan approval)</td></tr>
<tr><td colspan="2">Minimum Resource Requirements</td></tr>
<tr><td colspan="2">Initial resourcing requirements will be dependent upon the number of SMPs activated and the requirement for post spill baseline data to be collected. First strike personnel requirements for scientific monitoring field teams at Protection Priority areas are presented in Appendix Q:
+ Suitable vessels for on-water monitoring or transfer of personnel to remotes areas/islands
+ Vehicle/s as required
+ Helicopter for aerial surveys as required
+ Scientific monitoring personnel for first strike teams (refer Appendix Q)
+ Scientific monitoring equipment as detailed in the relevant SMP</td></tr>
</table>

18.8 Environmental performance

Table 18-4 indicates the environmental performance outcomes, controls and performance standards for this response strategy.

Table 18-4: Environmental performance – scientific monitoring

<table>
<tr><th>Environmental Performance Outcome</th><td colspan="3">Implement monitoring programs to assess and report on the impact, extent, severity, persistence and recovery of sensitive receptors contacted by a spill</td></tr>
<tr><th>Response Strategy</th><th>Control Measures</th><th>Performance Standards</th><th>Measurement criteria</th></tr>
<tr><td rowspan="3">Scientific Monitoring</td><td colspan="3">Response preparedness</td></tr>
<tr><td>Maintenance of Monitoring Service Provider contract for scientific monitoring services</td><td>Maintain access to specialist monitoring personnel and equipment by maintaining contract with Monitoring Service Provider throughout activity</td><td>Contract with monitoring service provider</td></tr>
<tr><td>Capability reports from Monitoring Service Provider</td><td>Obtain monthly capability reports from Monitoring Service Provider</td><td>Capability reports</td></tr>
</table>

Environmental Performance Outcome	Implement monitoring programs to assess and report on the impact, extent, severity, persistence and recovery of sensitive receptors contacted by a spill		
Response Strategy	**Control Measures**	**Performance Standards**	**Measurement criteria**
	Conduct periodical review of existing baseline data sources across the Santos combined EMBA	Regular review of baseline data	Baseline data review report
	Water quality monitoring vessels	Maintenance of vessel specification for water quality monitoring vessels	Vessel specification
	Oil and water quality monitoring equipment	Oil sampling kits located at Exmouth, Dampier and Varanus Island	Evidence of deployment to site
	Response implementation		
	Activate Scientific Monitoring Plans	Initiation criteria of SMPs will be reviewed during the preparation of the initial IAP and subsequent IAPs; and if any criteria are met, relevant SMPs will be activated	Incident Action Plan and Incident Log
		If any SMPs are activated, the subsequent activation of MSP is to follow the process outlined in Oil Spill Scientific Monitoring Standby and Response Manual (EA-00-RI-10162)	Incident Log
		MSP shall commence activation process within 30 mins of initial notification form being received from Santos	Monitoring Service Provider records
		Santos personnel to support MSP through the provision of operational monitoring information and relative location of sensitive receptors to the spill	Incident Log and Monitoring Service Provider records
	Mobilisation of minimum requirements for initial scientific monitoring operations	Minimum requirements mobilised in accordance with **Table 18-3**	Incident log

19 Spill Response Termination

The decision to terminate the spill response is made in consultation with the relevant Control Agency/s, Jurisdictional Authorities and other Statutory Authorities that play an advisory role (e.g. DBCA). This decision will be made with consideration of:

+ the efficacy and benefit of current response options
+ any potential for additional pollution
+ any potential for additional environmental damage caused by further clean-up efforts
+ an assessment of prevailing weather conditions that can increase risk to response teams or increase the efficacy in weathering hydrocarbon.

A NEBA will be conducted to inform the decision-making process. Termination criteria are defined within each section of contingency response activities defined within the OPEP.

Upon conclusion of the spill response activity, Santos will:

+ prepare detailed reports and collate all documents
+ report on the performance objectives of each individual spill response that was mobilised
+ undertake an inventory of consumables and prepare accounts
+ arrange for the return of equipment
+ arrange for the refurbishment of consumed equipment
+ conduct an investigation into the cause of the incident and report to relevant authorities
+ assess long-term environmental monitoring requirements.

20 Oil Pollution Emergency Plan Administration

20.1 Document review and revision

In line with regulatory requirements, this document shall be reviewed, updated and submitted to NOPSEMA every five years from date of acceptance.

The document may be reviewed and revised more frequently, if required, in accordance with the Santos Management of Change Procedure (EA-91-IQ-10001). This could include changes required in response to one or more of:

+ when major changes have occurred that affect oil spill response coordination or capabilities
+ changes to the Environment Plan that affect oil spill response coordination or capabilities (e.g. a significant increase in spill risk)
+ following routine testing of the OPEP if improvements or corrections are identified
+ after a Level 2/3 spill incident.

The extent of changes made to the OPEP and resultant requirements for regulatory resubmission will be informed by the relevant Commonwealth regulations; i.e., the OPGGS (E) Regulations.

20.2 Oil Pollution Emergency Plan custodian

The custodian of the OPEP is Santos Senior Oil Spill Response Coordinator.

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Appendix A: Hydrocarbon Characteristics and Behaviour

Marine diesel

In the marine environment diesel will behave as follows:

+ Diesel will spread rapidly in the direction of the prevailing wind and waves;
+ In calm conditions evaporation is the dominant process contributing to the fate of spilled diesel from the sea surface and will account for 60 to 80% reduction of the net hydrocarbon balance;
+ As wind increases, and breaking waves form, entrainment of diesel below the surface increases;
+ The evaporation rate of diesel will increase in warmer air and sea temperatures such as those present around the Bedout Multi-Well Drilling operational area; and
+ Diesel residues usually consist of heavy compounds that may persist longer and will tend to disperse as oil droplets into the upper layers of the water column.

ITOPF (2011) and Australian Maritime Oil Spill Centre-AMOSC (2011) categorises diesel as a light group II hydrocarbon. In the marine environment, a 5% residual of the total quantity of diesel spilt will remain after the volatilisation and solubilisation processes associated with weathering.

For full details on the properties of marine diesel, refer to Section 7.4 of the Bedout Multi-Well Drilling EP (SO-00-BI-20003).

Table A1: Characteristics of diesel

Hydrocarbon	Initial density (kg/m^3)	Viscosity (cP) @ 20°C	Component	Volatiles (%)	Semi-volatiles (%)	Low volatility (%)	Residual (%)
			Boiling Points (°C)	<180	180–265	265–380	>380
Diesel	836.8	4.0	% of total	6	34.6	54.4	<5

Source: APASA (2013a)

Hydraulic oils

These are medium oils of light to moderate viscosity and behave similarly to marine diesel when spilt to the marine environment. They have a relatively rapid spreading rate and dissipate quickly in ocean conditions. Similar to diesel, hydraulic oil residue will have a tendency to sit on the surface during calm conditions and will entrain during variable winds between 4 to 19 knots; returning to the surface when conditions become calm. After several days up to 40% could be expected to evaporate and 15% decay (APASA, 2013a).

Lubricating fluid

Lubricating oils vary widely but in general are comprised primarily of long-carbon chain, persistent, hydrocarbons (APASA, 2013b). These are reasonably viscous and so the spreading rate of a slick of these oils would be slow. These will not readily move into the water column, therefore are likely to remain on the water’s surface during calm to windy conditions. In the marine environment, approximately 90% residual of the total quantity of lubricating oil spilt is likely to remain after weathering (i.e., < 6% due to evaporation and < 8% due decay after several days). Lubricating oils also readily combine with seawater to form a water-in-oil emulsion, taking up as much as 70% by volume as water (APASA, 2013b).

Oily water

Oily water can be mixture of any hydrocarbon used or stored on the vessel mixed with stormwater, ocean water, or process water. The concentrations of oil in the water are usually quite low; thereby the volumes of hydrocarbons released in a spill event are quite low and tend to dissipate quickly.

Caley Condensate

A summary of Caley Condensate properties is provided in **Table A2**.

Table A2: Summary of Caley Condensate properties

Hydrocarbon	Specific Gravity	Viscosity (cSt) @ 20° C	Component	Volatiles (%)	Semi-volatiles (%)	Low volatility (%)	Residual (%)
			Boiling Points (°C)	<175	175-236.5	236.5-381.5	>381.5
Caley Condensate	0.7737	1.878	% of total	46.6	13.7	24.6	15.1

Source: Intertek (2020)

Further hydrocarbon characteristics for Caley Condensate include:

+ Asphaltene content (% mass) = <0.5 resulting in low tendency for the hydrocarbons to take up water to form water in oil emulsions
+ Wax content (% mass) = 9.2%
+ Pour Point (°C) = <-15
+ Condensate to Gas ratio = 570.4/STB/MMscf

<u>Dispersant Efficacy</u>

LAVRANS

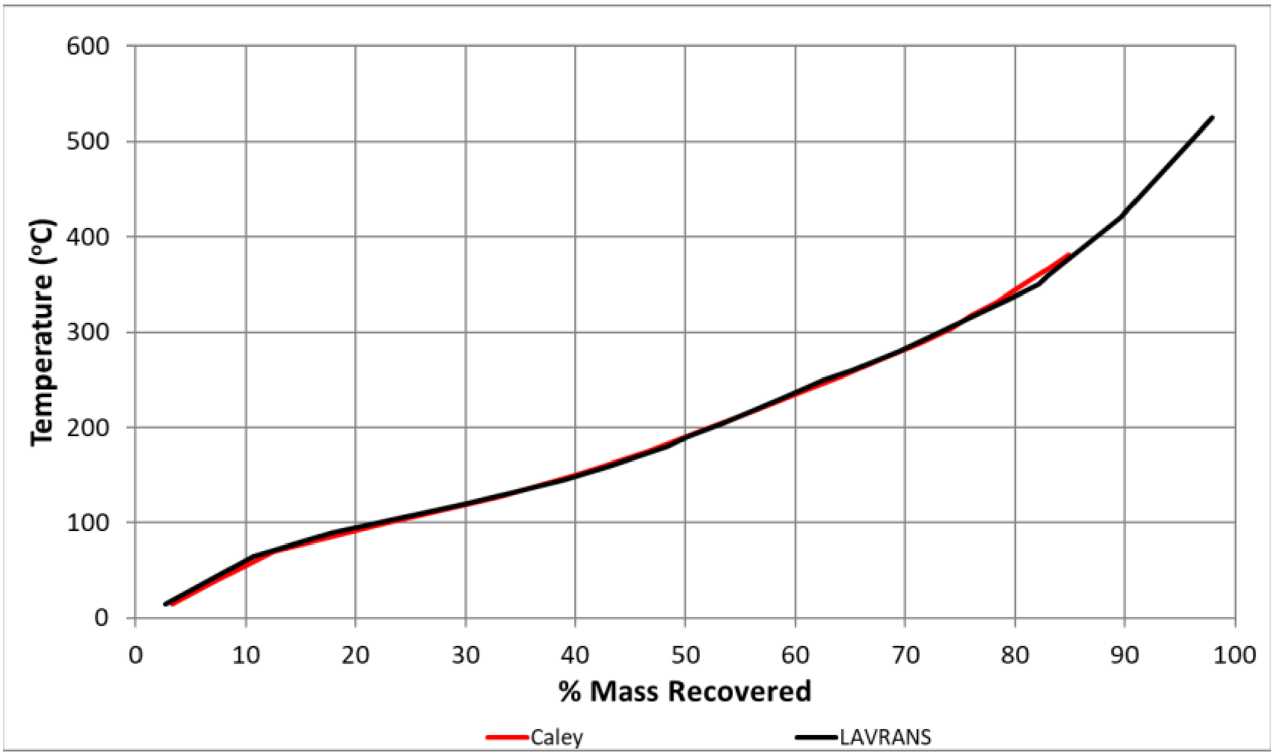
LAVRANS was used as an analogue for Caley Condensate during spill modelling. A summary of LAVRANS properties is provided in **Table A3**.

Table A3: Summary of LAVRANS properties

Parameter	LAVRANS
API	47.8
Specific Gravity	0.789
Wax Content (%)	6
Pour Point (°C)	-6
Asphaltene (%)	0.01
Viscosity (cSt)	2 (@20°C)

A comparison of the distillation curves of LAVRANS and Caley is presented in presented in **Figure A1**. The distillation curve is derived from laboratory tests to determine the percentage of hydrocarbon evaporated when heated to various temperatures. Lighter oil components evaporate under lower temperatures, whereas heavier components have a greater tendency to remain in liquid state, requiring higher temperatures to evaporate. This is analogous to oil weathering in the marine environment, whereby lighter components have a higher tendency to evaporate, dissolve or decay, and heavier components tend to persist as liquid hydrocarbon for extended durations. The distillation curve provides a reasonable prediction of the relative proportions of hydrocarbon components that will have rapid rates of weathering and the relative proportions that will persist. The comparison of the distillation curves for LANVRANS and Caley Condensate match very well, suggesting the hydrocarbons would have similar weathering behaviour.

Figure A1: Comparison of LAVRANS and Caley Condensate distillation curves (GHD, 2021b)



Appendix B: Oil Spill Response ALARP Framework & Assessment

ALARP Assessment Framework

1. Rationale

As part regulatory approval requirements for petroleum activities, the Environment Plan (EP) and/or Oil Pollution Emergency Plan (OPEP) must demonstrate that through the implementation of all reasonable control measures, environmental risks have been reduced to a level that is As Low As Reasonably Practicable (ALARP).

With respect to hydrocarbon spill risk and response planning, this includes an assessment to demonstrate that the oil spill response control measures are reducing risk to a level that is ALARP.

This ALARP Assessment Framework provides a process to facilitate the identification of all existing and potential spill response control measures, the selection or rejection of which are supported by reasoned arguments.

2. Guidance Documents

Guidance documents used in the preparation of this framework include:

+ Oil Spill Risk Assessment and Response Planning Procedure QE-91-II-20003;
+ NOPSEMA Guidance Note ALARP N-04300-GN0166 Revision 6 June 2015;
+ NOPSEMA Guidance Note Control Measures and Performance Standards N04300-GN0271 Revision No 4 Last Reviewed 2020;
+ NOPSEMA Guideline Environment Plan Decision Making N-04750-GL1721 Revision 6 – November 2019;
+ NOPSEMA Guidance Note Risk Assessment GN0165 Revision 5 May 2017; and
+ NOPSEMA Oil Pollution Risk Management GN1488 Rev 2 February 2018

3. Overview

The ALARP Assessment Framework uses activity specific information to systematically assess existing and potential control measures and ensure that all practicable control measures are identified and documented.

When selecting controls to reduce risk it is good practice to apply a preferential order; elimination, substitution, prevention, reduction and mitigation. In the context of this ALARP Assessment Framework for oil spill response, all control measures are response strategies to reduce the impacts of an unplanned event that has already occurred. All source control response measures may be classed as 'reduction' in the hierarchy of controls with all other response measures classed as 'mitigation'.

The ALARP Assessment Framework is shown in **Figure B1**.

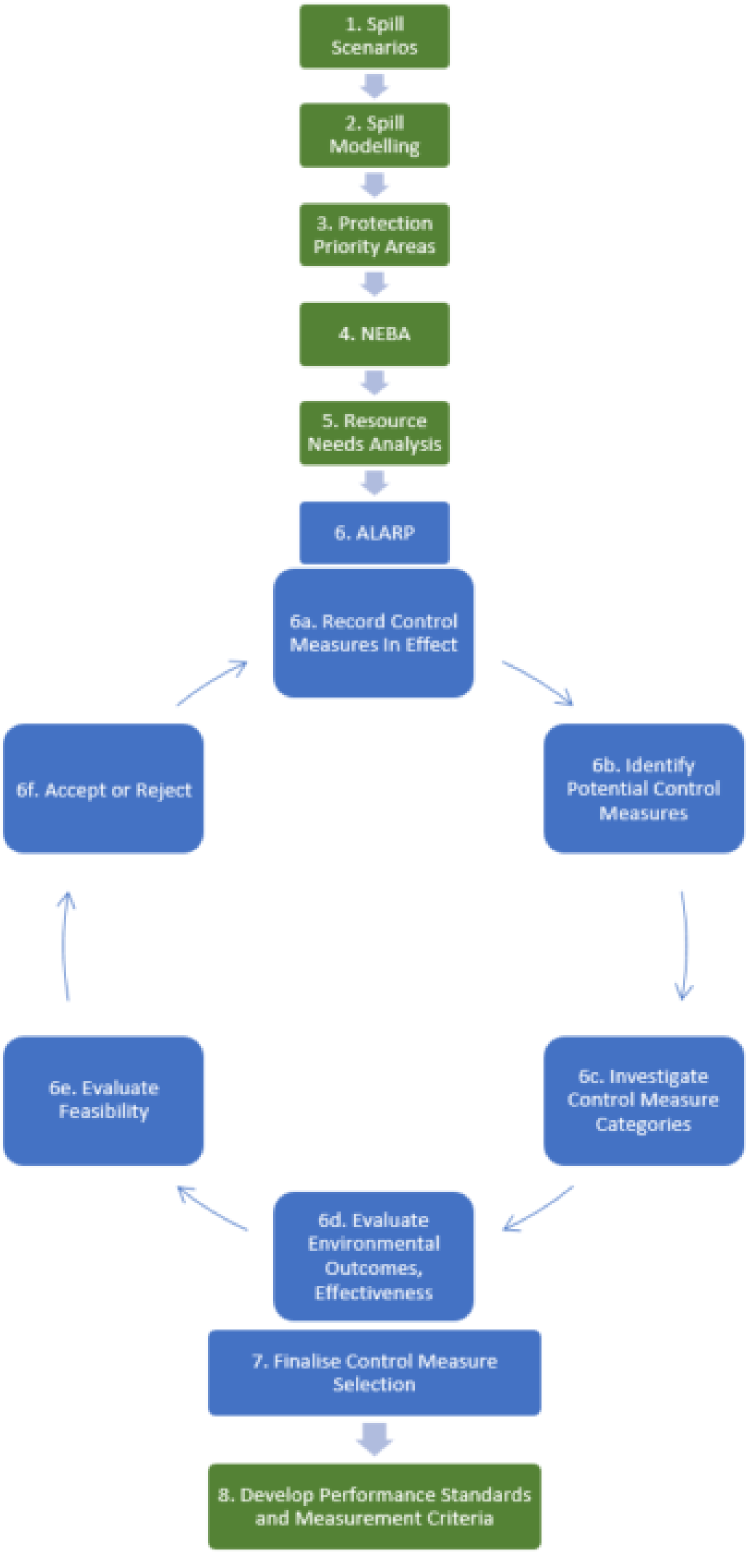


Figure B1: ALARP Assessment Framework

In **Figure B1**, Steps 1 to 5 (in GREEN) denote input information into the ALARP Assessment Framework. This information comprises:

1. Spill Scenarios: this step will involve assessing all possible spill scenarios from the activity and identifying the worst-case credible scenarios as a basis for pollution response planning.

2. Spill Modelling: a quantitative spill modelling assessment is conducted for the worst-case credible scenarios identified in Step 1.
3. Protection Priority Areas: The environment that may be affected (EMBA) is the largest area within which impacts from hydrocarbon spills associated with the activity could extend. The EMBA is predicted using spill modelling results from Step 2. Protection Priority Areas are locations of high ecological value within the EMBA that would be targeted in response. Selection of Protection Priority Areas is detailed in the Oil Spill Risk Assessment and Response Planning Procedure QE-91-II-20003
4. NEBA: Net Environmental Benefit Analysis (NEBA) is used to select the most effective response strategies to protect the Protection Priority Areas identified in Step 3.
5. Resource Needs Analysis: For the response strategies identified through NEBA, the worst-case resource, timing, and location requirements are determined, using quantitative spill modelling information where applicable. An Implementation Guidance is then developed to detail what arrangements and actions are required to be initiated by the Incident Management Team (IMT) to meet the incident requirements up to a worst-case incident.

Through the development of the Implementation Guidance, it may be possible to identify resource, timing and location requirements that could be improved. These areas of improvement should be noted in the ALARP so that additional, alternative or improved control measures can be considered in this context.

A detailed ALARP Assessment Framework for the evaluation of control measures is shown in Figure 1, Step 6 (in BLUE). Criteria and definitions used to evaluate control measures are shorn in Table 1.

6a) Record Control Measures In Effect: the spill response control measures currently in place for Santos Offshore are listed here. The environmental outcomes and effectiveness of the in-effect control measures are noted, using the Resource Needs Analysis to assess whether there are any areas of improvement. Environmental outcomes include potential harmful effects of control measures.

6b) Identify Potential Additional Control Measures: potential control measures are identified, with a focus on any control measures that address areas of improvement identified in Step 6a.

6c) Investigate Control Measure Categories: in-effect and potential control measures from Steps 6a and 6b are classified as either additional, alternative or improved, and as either people, system, equipment or procedures. This step serves as a prompt to ensure that potential control measures from all categories are explored.

6d) Evaluate Environmental Outcomes, Effectiveness: the environmental outcomes and effectiveness are assessed for all control measures identified and described through Steps 6a, b and c.

6e) Evaluate Feasibility: time, cost and effort required for implementation are assessed for all control measures identified and described through Steps 6a, b and c.

6f) Accept or Reject: the potential control measure will be accepted or rejected on the basis of environmental outcomes and effectiveness described in Step 6d and whether cost is grossly disproportionate, as described in Step 6e.

When evaluating potential control measures, implementation plans of in-effect control measures are carefully considered to ensure that any accepted control measures will equal or improve Santos capacity to meet resource needs. Potential control measures are also considered within the context of current Santos response arrangements to determine if synergies or resource conflicts might occur.

As control measures are evaluated for selection or rejection, they can be compared with industry good practise to ensure that all practicable control measures were implemented. Where unique circumstances exist and further analysis is required, a different evaluation technique may be used, such as technical analysis, detailed cost benefit analysis or combination of approaches.

New information on risks, impacts and response strategies obtained through analysis of operations, exercises and scheduled documentation reviews can be incorporated into the ALARP Assessment Framework cycle in a process of continual improvement.

In Figure B1, Steps 7 and 8 show the conclusion of the ALARP Assessment Framework:

7. Finalised Control Measure Selection: outputs from the ALARP Assessment shown in Step 6 comprise finalised control measures (in BLUE).
8. Develop Performance Standards and Measurement Criteria: for each control measure finalised in Step 7, performance standards and measurement criteria are then developed and documented in the OPEP (in GREEN).

Performance standards for all accepted control measures should be written to enable the operator to measure, monitor and test effectiveness. Only the key aspects of any given control will require performance standards and these may include the various measures of effectiveness; functionality, availability, reliability, survivability, dependency and compatibility. Parameters set in the performance standard should be 'SMART'; specific, measurable, appropriate, realistic and timely.

Corrective action based on deviations or trends in performance should be taken by amending either the performance standard or the control measure, as appropriate.

4. Criteria and Definitions

Standardised criteria and definitions are used to bring consistency to the ALARP assessment across diverse activities and response strategies. Criteria and definitions are shown in **Table B 1**.

Table B 1: Criteria and Definitions of ALARP Assessment Framework

Strategy	Response Strategy
Control Measure	Aspect of Response Strategy being evaluated Description of the control measure that is In Effect or description of the potential control measure
In Effect, Alternative, Additional, Improved	In Effect control measures are already in place. Alternative control measures are evaluated as replacements for the control already in effect. Additional control measures are evaluated in terms of their ability to reduce an impact or risk when added to the existing suite of control measures. Improved control measures are evaluated for improvements they could bring to the effectiveness of adopted control measures. Adapted from NOPSEMA Guideline Environment Plan Decision Making N-04750-GL1721 Revision 6 – November 2019
Control Measure Category	A range of different types of controls generally provide effective protection as they provide independence and multiple layers of protection. The OPGGS(S) Regulations refer to technical and 'other' controls where technical control measures involve hardware like shutdown valves and alarms. 'Other' control measures include administrative and procedural control measures such as inductions, a drug and alcohol policy or an inspection regime. Industry practice has further developed this concept of a range of different types of controls based on a POiSTED framework to assess organisational capability:

Strategy	Response Strategy
	People – personnel System – organisation, information/communications, support facilities, training/ competency Equipment – equipment Procedures – doctrine Santos aims to implement a range of different types of controls where possible.
Environmental Outcomes	Assessment of environmental benefits, particularly those over and above those environmental benefits documented in the Control Measure that is in effect. Environmental impacts of the Control Measure are also considered here.
Effectiveness	The effectiveness of a Control Measure in reducing the risk to ALARP is evaluated using the following six criteria. <u>Functionality</u> The functional performance of a control measure is what it is required to do. How does the control perform in order to achieve the required risk reduction? <u>Availability</u> Probability that the control measure will be available when required and has not failed or is undergoing a maintenance or repair. <u>Reliability</u> The reliability of a control measure is the probability that at any point in time it will operate correctly for a further specified length of time. Reliability is all to do with the probability that the system will function correctly and is usually measured by the mean time between failure. <u>Survivability</u> Whether or not a control measure is able to survive a potentially damaging event such as fire or explosion is relevant for all control measures that are required to function after an incident has occurred. To achieve their purpose, oil spill response control measures should have high survivability. However, some control measures, such as those involving equipment deployment from an FPSO would have low survivability in an incident that involves an FPSO explosion or fire. <u>Dependency</u> The dependency of the control measure is its degree of reliance on other systems in order for it to be able to perform its intended function. If several control measures can be disabled by one failure mechanism (common mode failure), or the failure of one control measure is likely to cause the failure of others, then the control measures are not independent and it may not be appropriate to count such measures as separate. Several control measures are reliant on equipment, people and vessels, hence have high dependence. <u>Compatibility</u> Whether or not a control measure is compatible takes into account how alternative control measures may interact with other controls and the rest of the facility, if introduced. Consideration should be given to whether new control measures are compatible with the facility and any other control measures already in use. Adapted from NOPSEMA Guidance Note Control Measures and Performance Standards N04300-GN0271 Revision No 4 Last Reviewed 2020

Strategy	Response Strategy
Feasibility	Feasibility describes the time, cost and/or effort required to implement the Control Measure.
Accept/ Reject	Outcome of assessment and key reasons for the decision

Bedout Multi-Well Drilling Oil Spill Response ALARP Assessment Summary

Alternative, Additional and Improved options have been identified and assessed against the base capability described for each of the relevant response strategies (**Section 9** through **to Section 18** and relevant appendices) . **Table B-2** provides a summary of the ALARP assessment conducted for this activity. Detailed ALARP assessment worksheets are presented in **Table B 3**.

Table B-2: ALARP Assessment Summary

ALARP Assessment Summary - Source Control (refer worksheet for further detail in Table B 3.)
The Control Measures in place for relief well drilling represent industry best practice and are considered to reduce the timeframe for drilling a relief well to as low as reasonably practicable in the context of the risk of an uncontrolled well leak from an exploration well. Potential Control Measures were identified and assessed by the Santos Drilling & Completions Department representatives. The drilling of a relief well is considered to be an effective control and relief well planning conducted in the area has demonstrated that a MODU will be on site for relief well drilling by day 33 from the start of a well release. Relief well drilling can be completed within 77 days using MODUs, equipment and specialist personnel that Santos has arrangements to gain access to. Thirteen additional Control Measures were identified and assessed (refer worksheet for further detail in **Table B 3**). Two additional Control Measures were accepted as reasonably practicable. Accepted response strategies were: + Direct surface intervention via well control experts + Pre purchase of relief well drilling supplies Eleven Control Measures were rejected as grossly disproportionate. Rejected response strategies were: + Contract source control personnel through a provider in addition to existing arrangements + Wild Well Control on standby in Perth during drilling operations to respond immediately to a LOWC + MODU on standby at activity location + Having a dedicated relief well MODU on contract. + Use of two drilling rigs during activity drilling campaign that drill simultaneously so that one rig could act as a relief well drilling rig for the other. + Time drilling campaign to align to other Santos drilling activity so that nearby drill rig could be used as a relief well drilling rig. + Schedule drilling campaign to avoid cyclone season + Pre-drill riserless intervals for a potential relief well before drilling the main well + Use of semi-submersible drilling rig to drill one or more of the wells + Install a mudline closure device + Alternative BOP design (additional sealing rams installed) Performance Standards and Measurement Criteria that have been developed for the in-effect Control Measures are shown in the **Section 9.3**. The key performance requirements for relief well drilling are the maintenance tracking, access and relief well planning arrangements (during times of maintaining preparedness) and the timely mobilisation of resources (during a response). These key areas of effectiveness are reflected in the Performance Standards.
ALARP Assessment Summary - Monitor and Evaluate (refer worksheet for further detail in Table B 3)
Various, independent inputs from multiple service providers are used to build a detailed Common Operating Picture in the incident. Areas of improvement for monitor and evaluate activities were the availability of aerial observers and SCAT trained personnel in initial 24 hours of incident and availability of vessels for water quality

monitoring. One potential Control Measure sought to make trained aerial observers available from Day 1 of a response, rather than Day 2, however an assessment of the Control Measure found that the cost was grossly disproportionate to the benefit. No potential Control Measures were identified to improve availability of SCAT trained personnel in the initial 24 hours of incident. A potential control measure to improve the availability of vessels for water quality monitoring by implementing more detailed vessel tracking parameters was evaluated and accepted. Six other potential Control Measures were also identified and assessed. Four were rejected as cost was grossly disproportionate to the reduction in risk, whilst two Control Measures around the provision of strategically located oil sampling kits and improved record keeping of service providers that could assist with fauna aerial observations were accepted as reasonably practicable.

Ten additional potential Control Measures were identified and assessed.

Five additional Control Measures were accepted as reasonably practicable. The accepted measures were:

+ Determine required vessel specifications and improve accuracy of Vessel Tracking System
+ Purchase of First Strike Oil sampling kits to be positioned at Exmouth, VI and Dampier.
+ Maintain a list of providers that could assist with fauna aerial observations; e.g. whale shark spotting planes
+ Arrangements for staff from an additional oil spill personnel provider
+ Just-In-Time training to train personnel for spill response roles

Five additional Control Measures were rejected as grossly disproportionate. Rejected response measures were:

+ Purchase of oil spill modelling system and internal personnel trained to use system
+ Purchase additional satellite tracking buoys
+ Ensure trained aerial observers based at strategic locations such as Exmouth (North Ningaloo Coast, Muiron Islands)
+ Trained monitoring specialists on site
+ Ensure trained marine mammal/fauna observers based at strategic locations such as Port Hedland, Karratha and Broome

Performance Standards and Measurement Criteria that have been developed for the in-effect and accepted Control Measures are shown in the OPEP. The key areas of effectiveness for the identified Control Measures, during times of preparedness, focus on maintaining access to equipment and personnel through contractual arrangements with vessel providers, aircraft providers, aerial observers, UAV providers, tracking buoys, oil spill trajectory modelling providers, satellite imagery providers water quality monitoring providers and spill responders. Additional key areas for effectiveness during preparedness are following relevant procedures such as the Protected Marine Fauna Interaction and Sighting Procedure, and limiting environmental impacts from response activity through personnel and vehicle management. During response, a key area for ensuring effectiveness is the mobilisation of requirements in order to commence monitor and evaluate operations. These key areas of effectiveness have been represented in Performance Standards for monitor and evaluate operations.

ALARP Assessment Summary - Containment and Recovery (refer worksheet for further detail in Table B 3)

Containment and recovery is just one of the many response options available in the oil spill response toolbox. It is more effective when a sufficient oil thickness can be achieved by the containment booms (minimum of 50 g/m²) and weather and sea-state conditions are suitable for safe operations within daylight hours.

For Bedout Drilling activities, containment and recovery is not considered a suitable option for Marine Diesel but could be suitable for Caley condensate due to its slightly higher wax content (9.2%) and under certain weather conditions. Evaporation will be the primary weathering mechanism for Caley condensate with more than 60% predicted to evaporate and the remaining oil removed by wind-driven natural dispersion in moderate (5m/s) to high winds (10m/s) conditions. Only in calm, low winds condition (1m/s), wind-driven dispersion into the water column is not expected to occur (GHD, 2021b). The high evaporation rates associated with the Caley Condensate also mean that it is unlikely to be safe to attempt to recover fresh oil in close proximity to the well. It is considered that containment and recovery would be most effective on weathered oil once the volatiles are removed (24 to 72hrs) and under suitable metocean conditions.

From an operational perspective, the window of opportunity for containment and recovery as a response option is severely restricted by the dominant metocean conditions with wind speeds exceeding 12 knots for over 40% of the time during winter and around 20 to 30% of the time during summer months. Additionally, currents are above 0.75 knots for a significant portion of the year (GHD, 2021b). Also, experience from spill incidents has shown that the efficiency of containment and recovery operations can vary widely depending on operational and environmental constraints and is usually limited between 5% and 10% of initial spilled volumes. The Macondo incident in 2009 (Gulf of Mexico) had an estimated containment and recovery rate of approximately 4% of the total volume of oil spilled, and the MV *Erika* oil tanker spill in 1999 (Atlantic Ocean) had an estimated containment and recovery rate of 6%. The Montara well blowout of 2009 had a higher recovery rate due to calm metocean conditions – 10% of the total oil spilled (IPIECA, 2015c). For the response capability assessment for containment and recovery operations, a 15% oil recovery target is assumed, which is considered highly conservative given the oil properties, dominant metocean conditions in the location and the low efficiency of containment and recovery operations as observed in past spill incidents.

Santos has access to suitable offshore booms and offshore skimmers for a potential Caley Condensate spill through several arrangements including AMOSC, OSRL, AMSA and Industry Mutual Aid. The total number of offshore booms and skimmers available to Santos under existing arrangements are detailed in **Table 11-4** which demonstrates availability of offshore booms and skimmers to meet a 15% oil recovery target. Current arrangements also provide guaranteed access to boom and skimmer equipment for an additional 27 offshore containment and recovery units, exceeding the response need identified. Furthermore, as an OSRL member, Santos can also gain access to the remaining boom and skimmer equipment from OSRL's global capability which could make up and additional 25 containment and recovery units, which can be made available on a case-by-case basis. Access to offshore boom and skimmers is not considered a limiting factor as the quantity of equipment available to Santos through existing arrangements exceed the response need identified for containment and recovery operations in the OPEP.

Santos also has access to temporary storage options for recovered oil for sustained containment and recovery operations in the event of an incident. The temporary offshore storage resources available detailed in **Table 11-4** meets the storage requirements identified for each containment and recovery unit (33 m^3 per unit x 21 units = 693 m^3). The current arrangements also provide guaranteed access to additional 520 m^3 of temporary storage available through OSRL and AMSA with options to further scale up this capability through arrangements with NWA and OEG. Oil tankers or barges will be used for storage and transfer of recovered oil from each containment and recovery unit and the estimated availability for these is provided in **Appendix U**: Containment and Recovery Logistics

. The recovery capacities for the tankers/PSVs identified meet the volume requirements for waste storage/transfer for containment and recovery operations.

The estimated vessel availability for containment and recovery operations was established in consultation with the Santos Marine Logistics Team. The detailed example list of potential deployment vessels, towing vessels and barges or PSVs/ tankers for waste storage and transfer is provided in **Appendix U**: Containment and Recovery Logistics

. The assessment of appropriate vessel availability for containment and recovery operations indicates that there are currently 27 vessels available in Australia that can be used to support deployment operations, which are covered under existing Santos MSAs. There is availability for approximately 10 more vessels within the region (Singapore) if additional resources are required (not covered under MSA). For towing vessels, 26 vessels are currently available within WA which are covered under existing Santos MSAs.

SIMOPS will be implemented to ensure safe operations and avoid conflict in areas where vessels and aircrafts are working in close proximity. Deployment of large number of vessels for containment and recovery operations alone within an area less than 100 km from the release location (for surface oil thickness >50 µm [GHD, 2021b]) will increase the risk for safe operations and is a limiting factor. Seven additional Control Measures were identified and assessed. Two additional Control Measure were accepted as reasonably practicable. The accepted control measures were: + Define containment and recovery vessel specifications and input this information to improve vessel tracking + Arrangements for staff from an additional oil spill personnel provider Five additional Control Measures were rejected as grossly disproportionate. Rejected control measures were: + Purchase of additional offshore booms and skimmers to be owned by Santos to achieve 100% oil recovery target through containment and recovery operations + Purchase of additional temporary waste storage to be owned by Santos to achieve 100% oil recovery target through containment and recovery operations + Access to additional vessels by contracting vessels to remain on standby for containment and recovery operations for the duration of the drilling campaign + Train additional Santos personnel for containment and recovery operations + Just-In-Time training to train personnel for spill response roles Performance Standards and Measurement Criteria that have been developed for the in effect and accepted Control Measures are shown in the OPEP. The key areas of effectiveness for the identified Control Measures, during times of preparedness, are around maintaining access to suitable vessels, equipment and personnel through contractual arrangements and the tracking of suitable vessels. During response, a key area for increasing effectiveness is the rapid mobilisation of first strike resources so that operations can be undertaken when oil concentration is at its highest. Given effectiveness of this strategy increases with oil concentration and decreases under high wind/sea state conditions, the consideration of these factors within an operational NEBA (SIMA) is considered a key control for maintaining effectiveness as well as the use of aerial surveillance to inform areas of operation of highest oil concentration. Waste storage may be a limiting factor for ongoing containment and recovery operations, so a key area for increasing effectiveness will be the application for approval for decanting wastewater from liquid oil waste storage tanks onboard vessels. These key areas of effectiveness have been represented in Performance Standards for containment and recovery operations.
ALARP Assessment Summary - Mechanical Dispersion (refer worksheet for further detail in Table B 3)
Mechanical dispersion is a secondary strategy that could be undertaken by vessels undertaking primary response strategies without the requirement for additional equipment, and no areas of improvement were identified. The use of mechanical dispersion in a response would be assessed as part of an operational NEBA. No potential additional Control Measures were identified and assessed. Performance Standards and Measurement Criteria that have been developed for the in-effect Control Measures are shown in the OPEP. The key areas of effectiveness for the identified Control Measures during a response are around the development of an operational NEBA to confirm suitability and environmental benefit, and the mobilisation of vessels. These key areas of effectiveness are reflected in the Performance Standards.
ALARP Assessment Summary - Subsea Dispersants (refer worksheet for further detail in Table B 3)
Subsea dispersant application is a secondary strategy that would be complementary to surface dispersant application but is likely to have limited effectiveness under a LOWC event. SSDI is only suitable for subsea LOWC scenarios. For this activity, the most likely type of loss of well control would be a surface discharge. Modelling indicates SSDI provides only a negligible benefit and in some instances resulted in a minor increase

in shoreline loading. Accordingly, using the Subsea First Response Toolkit for debris clearance or SSDI is considered a secondary response strategy for this activity, due to:

- no ROV-controllable devices installed subsea (surface wellhead and BOP used)
- the high exit velocity of subsea plumes which results in small, entrained droplets that are not materially affected by the subsea application of chemical dispersants that indicates minimal environmental benefit from SSDI.

For the reasons stated above, surface dispersant application is considered a primary strategy with SSDI considered a secondary strategy that might be employed if surface dispersant application and containment and recovery were not effective in meeting their performance outcome.

Deterministic modelling scenarios to which chemical dispersants were applied predicted varying levels of effectiveness in reducing shoreline loading for each LOWC scenario. This is likely due to the volatile nature of Caley Condensate meaning that more mass of fresh oil is lost, however once the oil is weathered dispersant may be more effective.

Control measures are in place for a rapid mobilisation of the SFRT, personnel and dispersants to Exmouth, however the key limiting factor for deployment is suitable SFRT capable vessels which may take considerably longer to mobilise (7-10 days). A Control Measure involving the positioning of SFRT vessels on standby at a regional port in order to reduce deployment time was assessed but was found to be disproportionate in terms of costs to the reduction in risk gained. Dispersant volumes available within WA, Australia and internationally (including if necessary, under manufacturing arrangements) and the mobilisation of these stocks exceed worse case requirements, hence dispersant is not a limiting factor to the operation.

Five additional potential Control Measures were identified and assessed.

One additional Control Measures were accepted as reasonably practicable:

- Develop and maintain dispersant supply and logistics plan to ensure worst case LOWC SSDI requirements can be met

Four additional Control Measures were rejected as grossly disproportionate. Rejected control measures were:

- Purchase of Santos SFRT to be located at Exmouth of Dampier
- Relocate AMOSC SFRT to Dampier
- Enable improved vessel access by contracting a suitable, dedicated vessel on standby
- Access to additional dispersant stockpiles owned by Santos

Performance Standards and Measurement Criteria that have been developed for the in-effect Control Measures are shown in the OPEP. The key areas of effectiveness for the identified Control Measures, during times of preparedness, are around the maintenance of contracts for the SFRT equipment, dispersants and deployment personnel and the tracking of suitable SFRT vessels. In the event of a response, the key areas for ensuring effectiveness are the mobilisation of requirements to commence subsea dispersant operations, the subsea monitoring of dispersant efficacy by ROV and the consideration of this information together with other operational monitoring information within an operational NEBA for the activity. These key areas of effectiveness are reflected in the performance standards.

ALARP Assessment Summary - Surface Dispersants (refer worksheet for further detail in Table B 3)

Vessel based dispersant spray systems are available from WA, AMOSC and AMSA in the region (including stockpiles at Exmouth and Dampier) and within WA. These spray systems are not considered a limiting factor to surface dispersant operations; the quantity of equipment available to WA through contractual arrangements and the positioning of equipment in first strike locations is considered adequate for the scale of worst-case surface dispersant operations identified in the OPEP. The timely mobilisation of suitable vessels and personnel required for surface dispersant operations are considered to be the key constraints for this strategy. A review of control measures associated with personnel and vessels identified that improvement could be made with respect to the identification of suitable surface dispersant vessels (through development of a vessel specification), but no improvements could be made to the availability of personnel without the cost/effort being disproportional to the risk. Aerial based dispersant application is available to WA through national and international resources via contractual arrangements. Mobilisation times for these resources are considered to be in line with industry best practice. No potential Control Measures were identified that could improve mobilisation times for aerial dispersant application. Dispersant volumes available within WA, Australia and internationally (including, if necessary, under manufacturing arrangements) and the mobilisation of these stocks exceed worse case requirements, hence dispersant is not a limiting factor to the operation.

Eleven additional potential Control Measures were identified and assessed.

Four additional Control Measure was accepted as reasonably practicable. The accepted control measure was:

- Define spray vessel specifications and input this information to improve vessel tracking
- Develop and maintain dispersant supply and logistics plan to ensure worst case LOWC SDA requirements can be met
- Arrangements for staff from an additional oil spill personnel provider
- Just-In-Time training to train personnel for spill response roles

Seven Control Measures were rejected as grossly disproportionate. Rejected response strategies were:

- Access to additional spray systems stored in Port Hedland, Broome, Karratha, Exmouth or Dampier
- Access to additional spray systems with dispersant stored on vessels
- Access to additional vessel (with trained personnel, equipment and dispersant onboard) by contracting a dedicated vessel to remain on standby for chemical dispersion
- Faster access to response personnel via Santos employment of local personnel
- Santos to contract personnel from Exmouth freight and logistics to deploy and operate vessel spray systems
- Access to aircraft via additional service provider
- Access to additional dispersant stockpiles owned by Santos

Performance Standards and Measurement Criteria that have been developed for the in effect and accepted Control Measures are shown in the OPEP. The key areas of effectiveness for the identified Control Measures during times of preparedness, are around the maintenance of contracts for the vessel based and aerial dispersant application resources, dispersants and deployment personnel and the tracking of suitable vessels. In the event of a response, the key areas for ensuring effectiveness are the mobilisation of requirements to commence surface dispersant operations and evaluating dispersant efficacy using test sprays and operational monitoring. Information on dispersant efficacy then feeds into the development of the operational NEBA. These key areas of effectiveness are reflected in the performance standards.

ALARP Assessment Summary - Protect and Deflect (refer worksheet for further detail in Table B 3)

Large quantities of various types of nearshore booms and skimmers from Exmouth, Dampier and Fremantle ensures that equipment is in place to implement this response strategy within 24 hrs in a wide range of metocean conditions. Trained regional Santos personnel can be quickly mobilised to appropriate locations using helo services, followed by AMOSC staff and AMOSC Core Group from Perth. These regional and state resources ensure that equipment and personnel are not a limiting factor in this response strategy. An area of improvement is availability of shallow draft vessel. A review of Control Measures associated with vessels identified that improvement could be made by adding a provision for shallow draft boom tow vessels in existing Master Service Agreements with vessel providers.

Eight additional potential Control Measures were identified and assessed.

Four additional Control Measures were accepted as reasonably practicable. The accepted response strategies were:

- Provision for shallow draft boom to vessels added to Master Service Agreement
- Just-In-Time training to train personnel for spill response roles
- Arrangements for staff from an additional oil spill personnel provider
- Review of shoreline sensitivity mapping. Review of TRPs and development of additional TRPs for all PPAs. TRP for Bedout Island and Karratha-Port Hedland will be written before drilling.

Four additional Control Measures were rejected as grossly disproportionate. Rejected control measures were:

- Santos to purchase additional shoreline and nearshore booms and ancillary equipment
- Access to additional shallow draft boom tow vessels owned by Santos
- Ensure trained personnel based at strategic locations such as Port Hedland, Broome, Karratha or Exmouth
- Review of shoreline sensitivity mapping. Review of TRPs and development of additional TRPs for key locations

Performance Standards and Measurement Criteria that have been developed for the in-effect and accepted Control Measures are shown in the OPEP. The key areas of effectiveness for the identified Control Measures, during times of preparedness, are around maintaining access to equipment and personnel through contractual arrangements. During response, a key area for ensuring effectiveness is the mobilisation of requirements in order to commence protection and deflection operations and the preparation of an operational NEBA for each operational period that takes into account protection priorities and the ongoing effectiveness of the response strategy. These key areas of effectiveness have been represented in Performance Standards for protection and deflection operations.

ALARP Assessment Summary - Shoreline Clean-up (refer worksheet for further detail in Table B 3)

Regional and Fremantle stockpiles and locally available supplies provide a range of shoreline clean-up equipment can be accessed to suit most beach types / required clean-up operations. Trained regional Santos personnel can be quickly mobilised to appropriate locations using helo services, followed by AMOSC staff and AMOSC Core Group from Perth. Equipment and trained personnel are not expected to be limiting factors for this response strategy. The availability of labour hire personnel for initial stages of a response was identified as an area of improvement. Control Measures that were evaluated to improve the availability of labour hire was either not feasible or the cost was grossly disproportionate to the reduction in risk. The availability of shallow draft vessels in initial stages of a response was also identified as an area or improvement. A review of control measures associated with vessels identified that improvements could be made by adding a provision for shallow draft boom tow vessels in existing Master Service Agreements with vessel providers. Waste management may be a limiting factor for ongoing shoreline clean-up operations and further information is shown in the ALARP assessment for Waste.

Twelve additional potential Control Measures were identified and assessed.

Five additional Control Measures were accepted as reasonably practicable. The accepted control measures are:

- Develop vessel specification for shallow draft transfer vessels for remote island clean-up
- Provision for shallow draft vessels added to Master Service Agreement
- Review of shoreline sensitivity mapping. Review of TRPs and development of additional TRPs for all PPAs. TRP for Bedout Island and Karratha-Port Hedland will be written before drilling.
- Just-In-Time training to train personnel for spill response teams.
- Arrangements for staff from an additional oil spill personnel provider.

Seven Control Measures were rejected as grossly disproportionate. Rejected control measures were:

- Mechanical mobile plant equipment for clean-up pre purchased and positioned at strategic locations such as Port Hedland, Broome, Karratha or Exmouth
- Pre-purchase and storage of additional equipment (decontamination/ staging equipment, clean-up and flushing, PPE) at strategic locations such as Port Hedland, Broome, Karratha or Exmouth
- Access to additional shallow draft vessels owned by Santos to transport personnel to key sensitive areas on offshore islands such as Bedout Island, Ashmore Reef, Imperieuse Reef MP, Clerke Reef MP and Muiron Islands
- Access to additional team leaders that are locally based at strategic locations (Port Hedland, Broome, Karratha or Exmouth) or can be mobilised within short time frames
- Faster access to clean-up personnel via Perth based labour hire contractor
- Faster access to clean-up personnel via locally based labour hire companies or emergency response organisations
- Faster access to clean-up personnel via Santos employment of local personnel – Port Hedland, Broome, Karratha or Exmouth.

Performance Standards and Measurement Criteria that have been developed for the in effect and accepted Control Measures are shown in the OPEP. The key areas of effectiveness for the identified Control Measures, during times of preparedness, are around maintaining access to suitable equipment and personnel through contractual arrangements. During response, a key area of effectiveness is the rapid mobilisation of equipment and personnel and preparation of a Shoreline Clean-up Subplan and NEBA to ensure that impacts from response activities are minimised and operations are conducted in accordance with protection priorities as confirmed by the Control Agency.

ALARP Assessment Summary - Oiled Wildlife (refer worksheet for further detail in Table B 3)

Oiled wildlife equipment including first strike kits and containers can be mobilised from regional locations and Perth. Further equipment is available through national or international resources to implement a timely and sustained response adequate for the scale of worst-case oiled wildlife operations identified in the OPEP. The availability of trained personnel in the initial stages of an incident is a limiting factor for this response strategy. Control Measures around the provision of trained personnel were reviewed to identify that trained Santos personnel could be based not just in the Perth Office but also at VI and DC facilities. Potential Control Measures around additional responders through pre-hiring or contracts with additional service providers were investigated but were found to be not beneficial and/or the cost was grossly disproportionate to risk reduction. An additional area of improvement is clarity for how Santos will integrate with Control Agencies OWR. It has been identified that additional planning captured in a Santos Oiled Wildlife Response Framework is a practicable control measure to ensure that resources are deployed in a coordinated approach.

Four additional potential Control Measures were identified and assessed.

Two Control Measures were accepted as reasonably practicable. The accepted control measures were:

- Development of a Santos Oiled Wildlife Response Framework which will set the corporate guidance for OWR preparedness and response and define how Santos will integrate with Control Agencies to provide a coordinated response
- Additional Santos OWR trained personnel positioned at VI and Perth

Two Control Measures were rejected as grossly disproportionate. Rejected control measures were:

- Pre-hire and/or prepositioning of staging areas and responders
- Direct contracts with service providers

Performance Standards and Measurement Criteria that have been developed for the in effect and accepted Control Measures are shown in the OPEP. The key areas of effectiveness for the identified Control Measures, during times of preparedness, are around maintaining access to equipment and personnel through contractual arrangements. During response, the mobilisation of requirements for initial oiled wildlife response operations and the management of the oiled wildlife response in accordance with the WA Oiled

Wildlife Response Plan are both key elements for achieving this strategy and they are represented as a Performance Standards.
ALARP Assessment Summary – Waste (refer worksheet for further detail in Table B 3)
The Santos contract with the waste service provider has provisions for waste management operations of the scale estimated to be required in worst case scenarios detailed in the OPEP. Further detail is captured in the Waste Management Plan - Oil Spill Response Support (QE-91-IF-10053). The waste service provider can mobilise waste receptacles to Port Hedland, Broome and Exmouth from Karratha within 12 hrs. Given the waste service provider arrangements and preplanning already undertaken, waste storage facilities, road transport and logistics are not expected to be limiting factors in the response. For these components, potential Control Measures were identified and evaluated but were found to either make no improvement in capability or cost was grossly disproportionate. An area of improvement is the availability of vessels required for waste transport at sea. One potential Control Measure to address this area of improvement was identified and assessed but cost was grossly disproportionate to risk. No other potential control measures were identified. Three potential additional Control Measures were identified and assessed. No Control Measure was accepted as reasonably practicable. Three Control Measures were rejected as grossly disproportionate. Rejected control measures were: + Maintain contracts with multiple service providers + Procure temporary waste storage for Santos stockpile + Contract additional vessels on standby for waste transport Performance Standards and Measurement Criteria that have been developed for the in-effect Control Measures are shown in the OPEP. The key areas of effectiveness for the identified Control Measures, during times of preparedness, are around maintaining access to waste management equipment and services through contractual arrangements. During response, a key area for increasing effectiveness is the timely mobilisation of requirements for initial response operations and defining critical management and reporting services to be provided by the waste service provider. These key areas of effectiveness are captured in the Performance Standards.
ALARP Assessment Summary - Scientific Monitoring (refer worksheet for further detail in Table B 3)
Oil spill scientific monitoring will be conducted on behalf of Santos by a contracted monitoring service provider as detailed in the Oil Spill Scientific Monitoring Standby and Response Manual (EA-00-RI-10162) and the relevant Scientific Monitoring Programs. An area of improvement is the availability of vessels in the initial stages of response. To address this area of improvement, a potential Control Measure around more detailed vessel tracking was assessed and accepted. Additionally, three potential Control Measures were identified and assessed. One Control Measure, the purchase and standby of scientific monitoring resources was found to be grossly disproportionate in cost in comparison to the reduction in risk. Two potential Control Measures relating to improved record keeping for scientific monitoring consumable requirements and suppliers and the provision of oil sampling kits to be located at strategic regional locations were both found to be reasonable and practicable, both were adopted. Four additional potential Control Measures were identified and assessed. Three additional Control Measure were accepted as reasonably practicable. The accepted control measures were: + Maintain equipment list and list of suppliers for implementation of Scientific Monitoring Plans + Oil sampling kits for scientific monitoring personnel to be positioned at Varanus Is., Exmouth and Dampier

- Determine required vessel specifications required for Scientific Monitoring implementation and improve accuracy of Vessel Tracking System

One Control Measure was rejected as grossly disproportionate. The rejected control measure was:

- Scientific monitoring personnel, plant and equipment on standby at the operational location

Performance Standards and Measurement Criteria that have been developed for the in effect and accepted Control Measures are shown in the OPEP. The key areas of effectiveness for the identified Control Measures, during times of preparedness, are around maintaining access to equipment and personnel through contractual arrangements, regular reviews of monitoring service provider capability and reviews of existing baseline data. During response, a key area for effectiveness is the mobilisation of requirements to commence scientific monitoring and ensuring relevant approved manuals and plans are followed. These key areas of effectiveness are reflected in the Performance Standards.

Bedout Multi-Well Drilling Oil Spill Response ALARP Assessment Worksheet

Alternative, Additional and Improved options have been identified and assessed in **Table B 3**. Controls highlighted in red have been considered and rejected on the basis that they are not feasible, the costs are clearly disproportionate to the environmental benefit, and/or the option is not reasonably practical. Control measures that have been included are highlighted in green and performance standards included in the response strategy section.

Table B 3 Detailed ALARP Assessment Worksheets.

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
Source Control – Adopted controls and standards are found in Section 9.3							
Subsea First Response Toolkit (SFRT) - refer to SSDI section below.							
Relief well drilling	Santos Drilling and Completions Source Control Team mobilised within 24 hours. Well Control Specialists mobilised within 72 hours. Contract/ MOUs for source control personnel. APPEA MoU for mutual assistance for relief well drilling.	In effect	People	Controlling flow of hydrocarbons as quickly as possible will reduce environmental impacts. Limit/prevent hydrocarbon contacting sensitive receptors	This primary source control measure provides functionality, availability, reliability, survivability, compatibility and independence Area for improvement; none identified	Cost of contracts/ MOUs	**In effect**
	BOP function testing	In effect	people	BOP rams pressure/function tested as per latest edition of API Standard 53 on deployment ensures timely activation of the BOP.	Provides functionality, availability, reliability, survivability, compatibility and independence	Effort required to conduct BOP function test	**In effect**
	Contract source control personnel through an alternative provider in addition to existing arrangements	Additional	People	No environmental benefit if additional services are surplus to requirements	Improved availability and reliability	Significant additional cost in maintaining two contracts for the same service	**Reject** No environmental benefit in having access to personnel surplus to requirements
	Wild Well Control on standby in Perth during drilling operations in order to respond immediately to a LOWC	Additional	People	No environmental benefit as WWC personnel are available to provide support within 72 hours which will coincide with starting to commence sourcing of relief well MODU	No change to effectiveness or reliability as WWC personnel available within a rapid timeframe under existing arrangements.	Significant additional costs in having WWC personnel on standby in Perth. Locating personnel with specialised expertise in Perth may also create issues for other operators, as WWC offer this service to multiple operators. Locating them in remote locations may increase travel times to other global locations if they are required	**Reject** No environmental benefit in having access to personnel surplus to requirements
	Source Control Planning and Response Guideline (DR-00-OZ-20001).	In effect	Procedure	Provides a set process top follow in the planning and mobilisation for relief well drilling by Santos Source Control Team thereby reducing the timeframe and increasing the effectiveness of relief well drilling.	Provides functionality, availability, reliability, survivability, compatibility and independence	Effort in updating and maintaining document	**In effect**
	MODU Capability Register is monitored monthly	In effect	Procedure	By monitoring MODU availability in the region, it will be possible to gain an understanding of which MODU may be rapidly available for relief well operations. This could reduce mobilisation times for MODU thus reducing volume of hydrocarbon released to the environment.	Provides functionality, availability, reliability, survivability, compatibility and independence	Effort spent monitoring	**In effect**

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
	Suitable relief well confirmed to available prior to drilling	In effect	Procedure	Identification of a suitable MODU prior to drilling would decrease the time spent searching for a suitable MODU in the event of a spill, reducing mobilisation times for MODU thus reducing volume of hydrocarbon released to the environment.	Provides functionality, availability, reliability, survivability, compatibility and independence	Effort spent monitoring	**In effect**
	Regular monitoring of Relief Well Availability Register to ensure preferred MODU remains available throughout the activity	In effect	Procedure	Monitoring the Register will ensure Santos are aware of any changes in availability of suitable MODUs, enabling Santos to update the Source Control Plan and identify an alternative suitable MODU if the event one changes location.	Provides availability, reliability, compatibility and independence	Effort spent monitoring	**In effect**
	MODU on standby at activity location	Improved	Equipment	Reduce mobilisation times of MODU to drill relief well thus reducing hydrocarbon released to the environment. Instead of base timeframe for the drilling of a relief well of 77 days, relief well potentially could be drilled in 43 days (77 days less the 34 days required for MODU to be ready to spud/commence relief well operations).	Reduction in spill duration by 34 days, resulting in less hydrocarbon exposure and reduced shoreline loading volumes.	The cost of having a MODU contracted, crewed and holding a valid NOPSEMA Safety Case and WOMP to be on standby would cost between 200-250kUSD per day for a minimum negotiated contract term, plus a cost associated for MODU mob and de-mob. This cost would be paid regardless of whether there is a loss of containment or not.	**Reject** Likelihood of LOWC is considered rare and the cost of having a second MODU on standby at location is considered grossly disproportionate to the environmental benefit. It is anticipated a MODU would need to be brought in from overseas to guarantee availability of this rig in the event a relief well was required when the event occurred. It is conceivable that to cover a 50day well activity (for example) with a relief MODU on standby cost over the same duration would be in the order 15-20MMUSD, depending on where the MODU were mobilised from/to and the market at the time.
	Having a dedicated relief well MODU on contract.	Improved	Equipment	Provides for rapid mobilisation of relief well rig to location, reducing duration of spill by approximately 20-30 days.	Results in improved availability, reliability and independence. Reduction in spill duration by 20-30 days, results in less hydrocarbon exposure and reduced shoreline loading volumes.	Significant commercial effort required to align two MODUs that are not contracted. Possible that market may not be able to supply this demand.	**Reject** In order to perform this, the MODU will need to be contracted, crewed and hold a valid NOPSEMA Safety Case. This could cost between 150-250k USD per day for a minimum negotiated contract term, plus a cost associated for MODU mob and de-mob. It is anticipated a MODU would need to be brought in from overseas to guarantee availability of this rig in the event a relief well was required when the event occurred. It is conceivable that to cover a 50 day well activity (for example) with a relief MODU on standby cost over the same duration would be in the order 15-20MMUSD, depending on where the MODU were mobilised from/to and the market at the time.

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
							Given there are adequate MODUs covered under the MOU to execute a relief well, this option was rejected as the reduction in risk is grossly disproportionate to the cost and effort required to perform it.
	Use of two drilling rigs during activity drilling campaign that drill simultaneously so that one rig could act as a relief well drilling rig for the other	Improved	Equipment	Provides for rapid mobilisation of relief well rig to location, reducing duration of spill by approximately 20-30 days.	Results in improved availability, reliability and independence. Reduction in spill duration by 20-30 days, results in less hydrocarbon exposure and reduced shoreline loading volumes.	Considered not feasible to contract and crew and support two rigs to drill two short wells at the same time given that requires: - Double the number of rig crew and service company crew to support the operations for a short time. - Possible inability of the market to supply two MODUs at the same time over a two-month window.	**Reject.** Similar reason to the above - would have to move in a rig to make this happen. MOU gives us sufficient access to relief well MODUs.
	Time drilling campaign to align to other Santos drilling activity so that nearby drill rig could be used as a relief well drilling rig	Improved	Equipment	Provides for rapid mobilisation of relief well rig to location, reducing duration of spill by approximately 20-30 days.	Results in improved availability, reliability and independence. Reduction in spill duration by 20-30 days, results in less hydrocarbon exposure and reduced shoreline loading volumes.	This refers to the Dorado activity. Would drilling occur at the same time? Could this rig be nominated as the RW rig for Bedout? This would significantly reduce timing (e.g. possibly 20-30 day reduction as not needing to wait for MODU to be sourced and transfer to location. (Check EP for consistency)	**Reject** No other concurrent Santos drilling activities expected in the region until mid-2024.
	Schedule drilling campaign to avoid cyclone season	Alternative	Procedure	Drilling the well in cyclone season does not increase the likelihood of a loss of containment. This will be verified by NOPSEMA in the accepted WOMP, where the plan to suspend the well during a cyclone will be assessed.	Does not alter the effectiveness of the response strategy.	Having to mob and de-mob a MODU to guarantee the well could be drilled outside of cyclone season would be a >5MM USD cost increase.	Reject There are no additional risks associated with cyclone season on a loss of well control. The barriers installed for cyclone suspension are independent of metocean conditions. Adjusting the timing would preclude the ability to drill for 6 months of the year, materially reducing the MODUs available to do the work. Having to mob. and de-mob. a MODU to guarantee the well could be drilled outside of cyclone season would be a >5MM USD cost increase, which is disproportionate to the benefit gained.

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
	Direct Surface Intervention Via Well Control Experts	Improved	Procedure	Reduce time taken to control source and reduce environmental impacts	1) Effectiveness of intervention of this type needs to be assessed at the time given that personnel safety considerations may preclude this control measure. 2) Mobilisation procedure for personnel as per SCERP 3-4) Contracts and MoUs for well control personnel (WWC)	Ability to implement and effectiveness of this control can only be determined at the time of an incident.	**Adopt** Santos has a standing agreement with Wild Well Control for call-out of well control experts. Arrangements already in place to access resources (SCERP, Contracts) but this control will be applied opportunistically and will be dependent upon safety constraints.
	Pre purchase of relief well drilling supplies	Improved	Equipment	Relief well drilling supplies such as casings and well head equipment could potentially reduce relief well drilling times	Increase in availability	Cost of purchase, maintenance and storage of supplies	**Adopt** Offshore D&C commit to having long lead equipment for a relief well at our disposal as part of our WOMP commitments for each well drilled.
	Relief well design assessment to identify and screen relief well spud locations prior to drill campaign	In effect	Procedure	Reduce time taken to plan and execute relief well, and reduce environmental impacts	Improved availability and reliability	Effort required to conduct relief well assessment	**In effect**
	Pre-drill riserless intervals for a potential relief well before drilling the main well	Additional	Equipment Procedure	Could reduce relief well drill duration by 10 days. However, this activity would result in drill cuttings/discharges being released to the marine environment and noise emissions regardless of whether a LOWC were to occur or not.	Detailed relief well designs will be re-evaluated and revised for an actual LOWC event. There will be several locations for the relief well identified before an incident, with the optimal location selected after a LOWC incident, based on real-time information (i.e. prevailing weather). A pre-drilled relief well top-section might result in having to use a sub-optimal design and location. It is not industry practice, and such a pre-drilled riserless interval may adversely affect functionality and reliability of this response strategy.	The pre-drilling activity itself would require approximately 10 days and a complete rig move to perform, costing approximately 6-7MM USD. Once the main well was completed, the partially completed relief well would need to be abandoned, at a further cost of 6-7MM USD.	**Reject** This option may result in a sub-optimal relief well location being used. There is minimal environmental benefit gained for the grossly disproportionate costs associated with this option.

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
	Use of semi-submersible drilling rig to drill one or more of the wells	Alternative	Equipment	Use of a semi-submersible drill rig would mean additional source control methods could potentially be employed to control the flow of hydrocarbons. This would include use of an Emergency BOP and Capping Stack.	Possibly results in a reduced time to stop flow from the well. Capping stack could be installed in 17-43 days vs a relief well at 77 days.	**Technical Feasibility:** Water depths at the Pavo and Apus locations are 65-93 m respectively. This water depth precludes the use of DP vessels (Drill-ships and DP Semis.) and would require a moored semi-submersible configurable for 12-point mooring. With the change in rig fleet over the last 10 years, most of the mid-water semi submersibles that operate in the <100m water depth range have been retired. 5th generation moored semis are much harder to moor in shallow water due to the larger size of the vessels & BOP resulting in increased metocean loads on mooring equipment and the BOP/Wellhead/Flex Joints. At these water depths, a semi-submersible may be able to be moored, but would likely be limited to older 3rd/4th generation units and would require extensive use of pre-laid moorings, heavy duty subsea wellheads to handle the bending loads and possibly wellhead fatigue reduction tethering equipment installed on the seabed. The exact MODU needs to be known to perform the detailed engineering work to confirm the MODU can be moored on location. Selecting a moored semi-submersible only would preclude a significant number of drilling units from being able to perform the work, which of course affects schedule and cost. **Complications with Capping Stack Installation :** The premise is that using a semi-submersible unit enables the use of a capping stack for WCD. This is based on the assumption that the LMRP and/or BOP can be	**Reject -** Drilling the wells with a semi-submersible over a jack up is rejected as the benefits are grossly disproportionate to the risk. In addition, the majority of semi-submersible rigs would not be technically suitable (i.e. DP units, units with only 8 mooring lines and very large 5/6th generation units). **Benefit:** If a capping stack were able to be installed, the spill could be reduced by as much as 226,368 m3 (assuming full escalation to WCD). However, it is considered "Unlikely" at best that a capping stack would be able to be installed given the shallow water depth and likely presence of the MODU over the location once down-manned. **Cost:** Using a semi-submersible instead of a jack-up for wells in Pavo & Apus will significantly increase cost and emissions from performing the activity. - Rig & Vessel Rental: Estimate 120k USD/day incremental rate for the MODU & 20k USD/day increase per vessel to use an anchor handler instead of a PSV. Estimate an additional 7 days or rig time (at 600k USD/day) over a jack-up to moor and de-moor the floating MODU. For a 60 day well, the incremental cost is 12.6MM USD to use a semi-submersible rather than a jack-up. - Emissions: As larger rigs/vessels are required and the duration is longer, it is estimated 30-40% more diesel will be consumed to perform the work on a semi-submersible. Given the number of suitable semi-submersible's is small, it is more likely that one will need to be secured from overseas, which could cost 5-10MM USD in mobilisation costs. In addition, jack-up wellhead equipment would likely be needed to enable a relief well to be drilled should another suitable semi not be available. Having this in addition to the subsea wellhead systems would cost an additional 1MM USD. **Likelihood of a WCD Event:** As jack-ups are not prone to loss of station events, well monitoring is not affected by metocean conditions (heave/pitch/roll) and

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
						disconnected, and the rig moved off location enough to enable vertical access to the BOP/Wellhead. It is estimated that the MODU would need to be kedged off location >100m to allow vertical access from a vessel. This kedging process involves moving up to 12 anchor winches and takes several hours to complete, all in an emergency situation when in reality the rig crew would be evacuated. It is not realistic to assume that this would happen in a WCD event. With the shallow water depth, it is less likely that a vessel would be unaffected by the boil/gas cloud at surface. Offset installation of a capping stack would be precluded given the presence of the rig and mooring lines over the location.	the BOP is at surface vs. subsea (i.e. higher reliability and availability), using a semi-submersible increases the likelihood of a WCD event compared to a jack-up.
	Install a mudline closure device	Improved	Equipment	Provides a pre-installed safety barrier at the seabed		Not feasible for jack-up drilling. The wellhead and BOP is at surface.	**Reject** based on feasibility
	Alternative BOP design (additional sealing rams installed)	Improved	Equipment	Reduces likelihood of a WCD event	Adds another layer of redundancy in BOP	Could be done. Require modifications to MODU, BOP and BOP control system to implement. Expected cost 3MM USD and time in shipyard or port to install.	**Reject.** Santos commits to using BOP equipment that is fully complaint with API Std 53, which specifies number and type of rams to be installed in the BOP for a given application. This will be a commitment in the SCR and the WOMP. Additional cost doesn't significantly reduce risk and BOP equipment will be fully compliant with industry standards.
Source Control - Vessel Collision	Vessel Spill Response Plan (SOPEP/SMPEP)	In effect	Procedure	Provides a set process to follow in the planning and mobilisation for spill response actions by the Vessel Contractor thereby reducing the timeframe and increasing the effectiveness of spill response.	Provides functionality, availability, reliability, survivability, compatibility and independence.	Effort required in contractor procedure due diligence.	**In effect**
Monitor and Evaluate – Adopted controls and standards are found in Section 10.9							
Oil Spill Trajectory Modelling	Maintain contract with Oil Spill Trajectory Modelling service provider. The service provider will be contacted immediately (within 2 hours) upon notification of a level 2 or 3 spill. Upon activation, the service provider will provide trajectory models within:	In effect	System	Knowledge of the spill, provided in a short-time frame, will inform the IMT decisions with the aim of reducing and mitigating environmental impact	Provides functionality, availability, reliability, survivability, compatibility and independence	Cost of contract	**In effect**

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
	- 2 hours for OILMAP model for offshore and open ocean; - 4 hours for OILMAP operations for near-shore; and - Detailed modelling service is available for the duration of the incident.				Area of improvement; none identified		
	Access to additional spill modelling capability through OSRL	In effect	System	Knowledge of the spill, provided in a short-time frame, will inform the IMT decisions with the aim of reducing and mitigating environmental impact	An additional service provider ensures redundancy (independence) if for some reason the other service provider was unable to fulfil the function. There is also the possibility of increased functionality associated with improved certainty of the modelling results if both service providers are activated.	Cost of membership	**In effect**
	Purchase of oil spill modelling system and internal personnel trained to use system	Alternative	System, people	This could result in the faster generation of the initial model which may result in an environmental benefit as a consequence of the IMT making operational decisions quicker	Potentially increases availability Decrease in functionality- in house service may not be across technical advances to same extent as contracted service providers	Purchase of system, training of personnel, and on-call roster	**Reject** The cost of purchasing the system, training and having personnel on-call is disproportionate to any potential gains from potentially being able to deliver initial results quicker than the 2-hour turn-around currently guaranteed by the service provider
Tracking buoy	Level 1: Two tracking buoys located on the MODU ready for deployment 24/7. Tracking buoys deployed within 2 hrs.	In effect	Equipment	Tracker buoys provide real-time verification data (particularly beneficial at night and in conditions limiting aerial surveillance)	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; none identified	Cost of equipment	**In effect**
	Level 1. Santos owns and maintains 12x tracking buoys across its NW facilities.	In effect	Equipment	Tracker buoys provide real-time verification data (particularly beneficial at night and in conditions limiting aerial surveillance)	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; none identified	Cost of equipment	**In effect**
	Level 2: tracking buoys available from AMOSC and through AMOSC Mutual Aid	In effect	Equipment	Tracker buoys provide real-time verification data (particularly beneficial at night and in conditions limiting aerial surveillance)	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; none identified	Cost of membership	**In effect**
	Level 3: tracking buoys available from OSRL. Transit times (air) Singapore to Karratha = 3–5 days.	In effect	Equipment	Tracker buoys provide real-time verification data (particularly beneficial at night and in conditions limiting aerial surveillance)	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; none identified	Cost of membership	**In effect**

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
	WA purchase additional satellite tracking buoys	Additional	Equipment	There is no expected environmental benefit from having additional tracking buoys, as there are already tracking buoys located on the facility/ vessel ready for deployment 24/7 and any additional needs can be provided by Santos owned stocks. Additional buoys can be accessed from AMSA, AMOSC and OSRL within days with no additional upfront cost.	Increase in availability and reliability	Cost of purchasing additional tracking buoys	**Reject** Does not provide any additional environmental benefit and the cost associated is therefore not warranted
Aerial surveillance - aircraft and crew	Maintain contract with service provider for dedicated aerial platform operating out of Karratha. (Helicopter services available through WA's primary contracted supplier. Activation of aerial surveillance using helicopter pilots will occur in 3 hours of notification of the spill. Helicopter on site for surveillance within 6 hrs. Surveillance and recording using helicopter pilots is considered adequate for situational awareness.)	In effect	System	Knowledge of the spill, provided in a short-time frame, will inform the IMT decisions with the aim of reducing and mitigating environmental impact	Provides functionality, availability, reliability, survivability, compatibility and independence Area for improvement - availability - rapid mobilisation of aerial observers in initial 24 hours of incident	Cost of contract	**In effect**
Aerial surveillance - observers	Level 1: Trained Santos observers will be available from Day 2 of the incident, following activation	In effect	People	Knowledge of the spill, provided in a short-time frame, will inform the IMT decisions with the aim of reducing and mitigating environmental impact	Provides functionality, availability, reliability, survivability, compatibility and independence Area for improvement - availability - rapid mobilisation of aerial observers in initial 24 hours of incident	Cost of training and maintaining trained staff	**In effect**
	Level 2: Access to additional aerial observers through AMOSC Staff and Industry Mutual Aid Core Group Responders	In effect	People	Knowledge of the spill, provided in a short-time frame, will inform the IMT decisions with the aim of reducing and mitigating environmental impact	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; none identified	Cost of AMOSC membership	**In effect**
	Level 3 : Access to additional aerial observers through OSRL (18 people). OSRL staff initial 5 technical advisors available from 2 to 3 days, remaining personnel available from 4 to 5 days, subject to approvals/ clearances.	In effect	People	Knowledge of the spill, provided in a short-time frame, will inform the IMT decisions with the aim of reducing and mitigating environmental impact	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; none identified	Cost of OSRL membership	**In effect**
	Ensure trained aerial observers based at strategic locations such as Port Hedland, Karratha and Broome	Additional	People	Current capability meets need and therefore environmental benefit would be incremental. Having trained observers living locally and on short notice to mobilise would result in trained aerial observers available from Day 1 (current arrangements are that the pilot would provide the initial	Improved availability and reliability	Costs associated with staff employment and training	**Reject** Cost is considered disproportionate to the incremental benefit given surveillance on Day 1 by pilots is considered sufficient

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
				observations and recording on Day 1 with trained aerial observers from Perth and VI mobilised and operational by Day 2).			
Aerial surveillance - unmanned aerial vehicles	Level 2: Unmanned Aerial Vehicles for aerial surveillance available through AMOSC (UAVs and pilots can be accessed through AMOSC with a mobilisation time of 12+ hours)	In effect	System	Use of UAVs may provide an environmental benefit compared to alternative options (such as helicopters and fixed wing aircraft) given shorter deployment time and ability to assess difficult areas.	Provides functionality and availability Area of improvement; none identified	Cost of membership with AMOSC	**In effect**
	Level 3: Unmanned Aerial Vehicles for aerial surveillance available through OSRL	In effect	System	Use of UAVs may provide an environmental benefit compared to alternative options (such as helicopters and fixed wing aircraft) given shorter deployment time and ability to assess difficult areas.	Provides functionality and availability Area of improvement; none identified	Cost of membership with OSRL	**In effect**
Vessel surveillance	Vessels and aircraft compliant with Santos's Protected Marine Fauna Interaction and Sighting Procedure (EA-91-11-00003)	In effect	Procedure	Provides the procedure for interaction and sighting of protected marine fauna from vessel or aircraft, to ensure compliance with EPBC Regulations.	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; none identified	Cost of maintaining and implementing procedure.	**In effect**
	Level 1: vessels in use by WA and located at (or in transit to) Ningaloo Vision, Exmouth, Dampier or Varanus Is. could be used for surveillance purposes in the event of a spill. (Vessel surveillance will be activated within 90 minutes for available on-site vessels. Santos has access to on-hire vessels supporting WA's VI and NV facilities. WA Vessel Monitoring System has access to automatic identification system live-vessel tracking portal to establish vessel availability.)	In effect	Equipment	Knowledge of the spill, provided in a short-time frame, will inform the IMT decisions with the aim of reducing and mitigating environmental impact. In comparison to aerial surveillance, vessel surveillance provided limited information.	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; none identified	Cost of existing contracts with vessel providers	**In effect**
	Level 2: vessels sourced through Master Service Agreement, located in region and tracked by WA Vessel Monitoring System.	In effect	Equipment	Knowledge of the spill, provided in a short-time frame, will inform the IMT decisions with the aim of reducing and mitigating environmental impact. In comparison to aerial surveillance, vessel surveillance provided limited information.	Improves availability and reliability Area of improvement; none identified	Cost of vessel monitoring. Cost of contracts at the time of requirement.	**In effect**
	Level 3: vessels sourced without existing contracts from any location	In effect	Equipment	Knowledge of the spill, provided in a short-time frame, will inform the IMT decisions with the aim of reducing and mitigating environmental impact. In comparison to aerial surveillance, vessel surveillance provided limited information.	Improves availability and reliability Area of improvement; none identified	Cost of contracts at the time of requirement.	**In effect**
Water Quality Monitoring	Maintain of monitoring service provider contract for water quality monitoring services. Water	In effect	System	This monitoring will confirm the distribution and concentration of oil,	Provides functionality, availability, reliability,	Cost of contracts	**In effect**

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
(operational and scientific)	quality monitoring personnel, equipment and vessel deployed to spill site within 72 hrs.			validating spill trajectory modelling and inform the IMT decisions with the aim of reducing and mitigating environmental impact	survivability, compatibility and independence Area of improvement; availability of vessels		
	Access to additional water quality monitoring services through OSRL	In effect	System	This monitoring will confirm the distribution and concentration of oil, validating spill trajectory modelling and inform the IMT decisions with the aim of reducing and mitigating environmental impact	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; availability of vessels	Cost of OSRL membership	**In effect**
	Determine required vessel specifications and improve accuracy of Vessel Tracking System	Improved	Procedure	Improve mobilisation time	Improved availability and reliability	Cost to determine vessel specifications	**Accept**
	Purchase of First Strike Oil sampling kits to be positioned at Exmouth, VI and Dampier. Development of technical procedure for sample collection by untrained personnel	Additional	Equipment, procedure	Will enable Oil fingerprinting, and initial measurements of oil concentrations	Improve function, availability, survivability and compatibility	Cost of purchasing equipment and developing procedure	**Accept**
	Trained monitoring specialists on site	Additional	People	Ensure sampling is conducted correctly	Improves reliability	Costs associated with staff employment	**Reject** This is not necessary as a good procedure for sample collection is in place
Satellite Imagery	Maintain membership with AMOSC provider to enable access and analysis of satellite imagery.	In effect	Systems	Satellite imagery is considered a supplementary source of information that can improve awareness but is not critical to the response and usage is at the discretion of the IMT	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; none identified	Cost of membership with AMOSC	**In effect**
	Maintain membership with OSRL to enable access to and analysis of satellite imagery	In effect	System	Satellite imagery is considered a supplementary source of information that can improve awareness but is not critical to the response and usage is at the discretion of the IMT	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; none identified	Cost of membership with OSRL	**In effect**
Shoreline Assessment	Level 1: WA-based AMOSC staff and core group operations personnel (WA has arrangements through AMOSC to mobilise WA-based AMOSC staff and Core Group personnel to site 24 hours following initiation)	In effect	People, procedures	To assist in determining which response methods are most appropriate for shorelines, it is necessary to obtain information about shoreline character, degree and distribution of oiling (if present), presence of sensitive receptors (habitats, fauna etc.) and information on shoreline processes and access routes that could aid or hamper response efforts	Provides functionality, availability, reliability, survivability, compatibility and independence Area for improvement; availability - reduce time to mobilise personnel to strategic locations	Cost of AMOSC membership	**In effect**
	Level 3: Maintain membership with OSRL to access SCAT trained responders (OSRL). For personnel numbers refer to **Appendix T**: Cumulative Response Capability Assessment	In effect	People, procedures	To assist in determining which response methods are most appropriate for shorelines, it is necessary to obtain information about shoreline character, degree and distribution of oiling (if present),	Provides additional functionality, availability, reliability, survivability, compatibility and independence	Cost of OSRL membership	**In effect**

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
				presence of sensitive receptors (habitats, fauna etc.) and information on shoreline processes and access routes that could aid or hamper response efforts	Area of improvement; none identified		
	Arrangements for staff from an additional oil spill personnel provider	Additional	Personnel	Greater capacity for shoreline assessments in the later stages of response	Improved availability and reliability, lower dependence	Time and cost of management	**Accept** The Response Group will increase available numbers of personnel with the appropriate experience and skill set
	Just--In--Time training to train personnel for spill response roles	Additional	People	Greater capacity for shoreline clean-up assessment in the later stages of response	Improved availability and reliability, lower dependence	High cost of training at time of requirement. Extended period prior to minimum shoreline contact provides window of opportunity to train workforce. Trainees require minimal prior skills and will be easily sourced.	**Accept** A contingency plan to create a pool of trained personnel in the early stages of a response in numbers above the expected requirement.
Wildlife Reconnaissance (aerial/ vessel surveillance. Shoreline and coastal habitat assessment)	Maintain contract with scientific monitoring service provider for access to fauna aerial observers and personnel experienced in conducting relevant fauna surveys.	In effect	People, procedures	Wildlife reconnaissance aids the IMT to plan and make decisions for executing an oiled wildlife response and for minimising impacts to wildlife associated with the clean-up response	Provides functionality, availability and compatibility Area for improvement; availability - reduce time to mobilise personnel to strategic locations	Cost of contract	**In effect**
	Maintain a list of providers that could assist with fauna aerial observations, e.g. whale shark spotting planes	Additional	People	Wildlife reconnaissance aids the IMT to plan and make decisions for executing an oiled wildlife response and for minimising impacts to wildlife associated with the clean-up response	Improves availability and reliability Area of improvement; none identified	Cost of developing and maintaining list	**Accept**
	Ensure trained marine mammal/fauna observers based at strategic locations such as Port Hedland, Karratha and Broome	Additional	People	Having trained marine mammal/fauna observers living locally and on short notice to mobilise would result in trained aerial observers available from Day 1	Improved availability and reliability	Costs associated with staff employment and training	**Reject** Maintaining trained fauna observers at location is considered grossly disproportionate as they are required only for the initial stages of the response until observers from scientific monitoring provider can be mobilised.
Containment and Recovery - Adopted controls and standards are found in Section 11.6							
Containment and recovery - booms and skimmers	Offshore booms and skimmers to supply capability for 15% oil recovery target (21 containment and recovery units: ~4,700m^3 per week). Equipment supplied from a combination of AMOSC, OSRL, AMSA and Industry Mutual Aid stockpiles.	In effect	Equipment	Reduce the volume of surface hydrocarbons to reduce contact with protection priorities.	Provides functionality, availability, reliability, survivability, compatibility and independence. Reliability is attained through OSRO contracts. Area of improvement; none identified.	Cost of OSRO membership contracts for AMOSC and OSRL. MOUs in place for Industry Mutual Aid and AMSA.	**In effect**
	Offshore Booms and skimmers to supply additional capability for greater than 15% oil recovery target (an additional 27 containment and recovery units: an additional ~6,230m^3 per week or ~20% oil recovery target). Equipment	In effect	Equipment	Potentially reducing the volume of surface hydrocarbons to reduce contact with protection priorities. Greater capacity for containment and recovery operations. Potentially increased volume of oil collected.	Provides functionality, availability, reliability, survivability, compatibility and independence. Reliability is attained through OSRO membership contracts.	Cost of OSRO membership contracts for AMOSC and OSRL, MOUs in place for Industry Mutual Aid and AMSA.	**In effect**

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
	supplied from a combination of AMOSC, OSRL, AMSA and Industry Mutual Aid stockpiles.				Area of improvement: none identified.		
	Purchase of additional booms and skimmers to be owned by Santos to achieve 100% oil recovery target through containment and recovery operations	Additional	Equipment	Reduce the volume of surface hydrocarbons to reduce contact with protection priorities. Greater capacity for containment and recovery operations. Potentially increased volume of oil collected.	Provides improved availability of containment and recovery resources, potentially provides further improvement in volume of oil collected. Effectiveness of containment and recovery is a key consideration alongside other response strategies; Past spill events have indicated recovery rates in the range of 4% to 10% of total oil spilled at best (IPIECA, 2015c).	**Cost:** Cost of equipment purchase and maintenance **Technical Feasibility:** The WCD scenario will be a large incident where multiple response techniques will be employed simultaneously. Coordination of simultaneous operations (SIMOPS) will be implemented to ensure safety and avoid conflicts in areas where vessels and aircrafts are working in close proximity (e.g. for Source Control, Aerial Dispersant Application, Containment and Recovery). To maximize the effectiveness of overall response effort, the most effective and advantageous response options will be deployed as close to the source as possible (IPIECA,2015c). Containment and recovery will be deployed along with other available response options (e.g. Dispersant Application) to build the most appropriate response strategy. Deployment of ~272 vessels to achieve a potential 100% recovery target for containment and recovery operations alone within an area less than 100km from the release location (for surface oil thickness >50 µm [GHD, 2021b]) will increase the risk for safe operations and is a limiting factor.	**Reject** The number of containment and recovery units (21) is based on a target recovery rate of 15%, which is already considered to be highly ambitious; past spill events have indicated recovery rates in the range of 4% to 10% at best (IPIECA, 2015c). Santos already has the capability to scale up the oil recovery target to 20% through existing arrangements. Furthermore, as an OSRL member, Santos can also gain access to remaining 25 offshore containment and recovery units of OSRL's global capability (made available on a case-by-case basis), to achieve an oil recovery target of 54%. To achieve a 100% oil recovery target, Santos would need access to ~136 containment and recovery units. Santos has guaranteed access to equipment for ~48 containment and recovery units through existing arrangements. The purchase costs for remaining units is estimated at $17.6M. The cost of providing for additional units through purchase of containment and recovery equipment is therefore considered grossly disproportionate to the potential environmental benefit, given the historical low recovery rates of between 4 and 10% from past spill events (IPIECA, 2015c) and the predicted weathering rates of Caley Condensate; it is only under low wind conditions (1 m/s) that the condensate is predicted to persist for longer than 72 hours (GHD, 2021b). In addition, the window of opportunity for containment and recovery as a response option is severely restricted by the dominant metocean conditions, with wind speeds exceeding 12 knots for over 40% of the time during winter and around 20 to 30% of the time during summer months. Additionally, currents are above 0.75 knots (the maximum current/ towing speed for containment and recovery operations [IPIECA, 2015c]) for a significant portion of the year (GHD, 2021b).
Containment and recovery -	Liquid waste storage capacity available to support 33 m^3 of temporary waste storage on board deployment vessels for 21 containment	In effect	Equipment	Reduce the volume of surface hydrocarbons to reduce contact with protection priorities.	Provides functionality, availability, reliability, survivability, compatibility and	Cost of contract with OEG, cost of OSRO membership contracts,	**In effect**

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
liquid oil waste tanks	and recovery units (693 m^3 of storage) to achieve 15% recovery target. Supplied through a combination of OSROs (AMOSC and OSRL), AMSA and contract with Santos contracted container provider (OEG).				independence. Reliability is attained through OSRO membership contracts and terms of engagement conditions with OEG. Area of improvement; increasing the functionality of liquid waste storage tanks through decanting operations approved by DoT or AMSA.	MOUs in place for AMOSC and AMSA.	
	Liquid waste storage capacity available on-board deployment vessels to support an additional 726 m^3 of temporary waste storage Supplied through a combination of OSROs (AMOSC, AMSA and OSRL) and contract with Santos contracted container provider (OEG).	In effect	Equipment	Reduce the volume of surface hydrocarbons to reduce contact with protection priorities. Greater capacity for containment and recovery operations. Potentially increased volume of oil collected.	Provides functionality, availability, reliability, survivability, compatibility and independence. Reliability is attained through OSRO membership contracts and terms of engagement conditions with OEG. Area of improvement; increasing the functionality of liquid waste storage tanks through decanting operations approved by DoT or AMSA.	Cost of contract with OEG, cost of OSRO membership contracts, MOUs in place for AMOSC and AMSA.	**In effect**
	Purchase additional temporary waste storage to be owned by Santos to achieve 100% oil recovery target through containment and recovery operations.	Additional	Equipment	Reduce the volume of surface hydrocarbons to reduce contact with protection priorities. Greater capacity for containment and recovery operations. Potentially increased volume of oil collected.	Provides improved availability of containment and recovery resources, potentially provides further improvement in volume of oil collected.	Cost of new equipment purchase and storage/ maintenance (approx. $50k purchase cost per storage bladder per unit, plus cost of waste container hire [2 x 4,000L ISO tanks] per unit)	**Reject** The number of containment and recovery units (21) is based on a target recovery rate of 15%, which is already considered to be highly ambitious; past spill events have indicated recovery rates in the range of 4% to 10% at best (IPIECA, 2015c). Santos already has the potential to ramp up the response to greater than 21 units through existing arrangements (capacity for an additional 726m^3 of waste storage). The cost of purchasing additional temporary towable storage barges to achieve 100% oil recovery target is estimated to be $63M.The cost of providing for additional units through purchase of waste storage equipment is therefore considered grossly disproportionate to the potential environmental benefit.
Containment and recovery-vessels	Vessels in use by Santos and located at (or in transit to) Ningaloo Vision, Exmouth, Dampier or Varanus Is. Suitable towing vessels mobilised to deployment port within 12 hrs. Suitable deployment vessels mobilised to deployment port within 24 hrs.	In effect	Equipment	Reduce the volume of surface hydrocarbons to reduce contact with protection priorities.	Provides functionality, availability, reliability, survivability, compatibility and independence. Area of improvement; none identified.	Cost of variation to existing contracts with vessel providers	**In effect**

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
	Vessels sourced through Master Service Agreement, located in region and tracked by Santos Vessel Monitoring System (IHS Maritime Portal)	In effect	Equipment	Reduce the volume of surface hydrocarbons to reduce contact with protection priorities.	Provides survivability, compatibility and independence. Area of improvement; functionality, availability and reliability of tow vessels.	Cost of vessel monitoring system (IHS Maritime Portal subscription). Cost of contracts at the time of requirement/appointment.	**In effect**
	Vessels sourced without existing contracts from any location and tracked by Santos Vessel Monitoring System (IHS Maritime Portal)	In effect	Equipment	Reduce the volume of surface hydrocarbons to reduce contact with protection priorities.	Provides survivability, compatibility and independence. Area of improvement; none identified	Cost of vessel monitoring system (IHS Maritime Portal subscription), cost of brokers fees. Cost of contracts at the time of requirement/appointment.	**In effect**
	Access to additional vessels by contracting vessels to remain on standby for containment and recovery operations for the duration of the drilling campaign	Additional	Equipment	Greater capacity for containment and recovery operations in the initial 2-5 days of response	Improved availability and reliability of vessels for containment and recovery operations	Cost of contracting vessels for standby containment and recovery	**Reject** Santos Marine Logistics team continually monitors vessel availability through Santos Vessel Monitoring System (IHS Maritime Portal). The system regularly shows availability of vessels of the required specification to meet the required number of containment and recovery units with availability within 1-2 days, and also capacity over and above the required number of units (i.e. over 21 units). The cost for contracting 21 deployment vessels to be on stand-by for the duration of the drilling campaign (80 days) is estimated to be between $50M to $67M and the cost for contracting 21 towing vessels to be on stand-by is estimated to be between $17M to $60M. Therefore the cost of vessel stand-by is considered grossly disproportionate to the environmental benefit of a slightly increased response time in the initial 2-5 days of the response.
	Define containment and recovery vessel specifications for deployment and towing vessels and input this information to improve vessel tracking.	Improved	System	More accurate vessel tracking may lead to faster mobilisation times, potential for response operations at more locations	Improved availability and reliability.	Cost and effort to gather and input data	**Accept** Cost of control measure is proportionate to environmental benefit
Containment and recovery- personnel	Spill responders from Varanus Is., Devil Creek, Perth (Santos), Fremantle (AMOSC staff), Perth (AMOSC Core Group). Santos resources in place to commence operations within 2–12 hrs. AMOSC Staff and AMOSC Core Group mobilised to deployment port within 24 hrs. For personnel numbers refer to **Appendix T**: Cumulative Response Capability Assessment	In effect	People	Reduce the volume of surface hydrocarbons to reduce contact with protection priorities	Provides functionality, availability, reliability, survivability, compatibility and independence. Functionality attained through training and exercises. Area of improvement; availability - rapid mobilisation of personnel.	Employment and training of Santos staff. Cost of contracts in place for AMOSC staff	**In effect**
	Spill responders from Geelong (AMOSC staff), interstate (AMOSC Core Group; AMSA) and international (OSRL). Interstate staff available from 2 to 3 days. OSRL staff initial 5 technical advisors available from 2	In effect	People	Reduce the volume of surface hydrocarbons to reduce contact with protection priorities	Provides functionality, availability, reliability, survivability, compatibility and independence.	Employment and training of Santos staff. Cost of contracts, MOUs in place for AMOSC Core Group and OSRL	**In effect**

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
	to 3 days, remaining personnel available from 4 to 5 days, subject to approvals/ clearances. For personnel numbers refer to **Appendix T**: Cumulative Response Capability Assessment				Area of improvement; availability - rapid mobilisation of personnel.		
	Train additional Santos personnel for containment and recovery operations	Additional	Personnel	Greater capacity for containment and recovery in the initial 2-5 days of response	Improved availability and reliability	Cost of training and staff hours	**Reject** AMSA, AMOSC, AMOSC Core Group and OSRL have sufficient numbers of personnel with the appropriate skill set
	Just-In-Time training to train personnel for containment and recovery operations	Additional	People	Greater capacity for containment and recovery in the later stages of response	Improved availability and reliability, lower dependence	Difficult to identify trainees with appropriate prior skill sets such as maritime experience. Concerns around adequacy of training. Supervisors of complex operations require long term experience.	**Reject** Not required to address any gap, and not feasible due to adequacy and safety concerns
	Arrangements for staff from an additional oil spill personnel provider	Alternative	Personnel	Greater capacity for containment and recovery in the later stages of response	Improved availability and reliability, lower dependence	Time and cost of management	**Accept** The Response Group will increase available numbers of personnel with the appropriate skill set
Mechanical Dispersion- Adopted controls and standards are found in Section 11.6							
Mechanical Dispersion	Use of vessel crews, contract vessels and vessels of opportunity to disperse small areas of amenable hydrocarbon types such as marine diesel.	In effect	People, equipment	Enhanced dispersion and biodegradation of released hydrocarbons	Provides availability, reliability, survivability, compatibility and independence. Limited functionality as mechanical dispersion is secondary response strategy limited by weather conditions, hydrocarbon type and hydrocarbon volume.	Cost of vessel time	**In effect**
Subsea Dispersants- Adopted controls and standards are found in Section 13.8							
ROV survey	ROV Survey conducted at the release point to determine the nature of the release. This information will inform the applicability of subsea chemical dispersion and initial choice of dispersant injection methods (e.g., number of nozzles, nozzle sizes) and DOR.	In effect	Procedure, equipment	SSDI can break-up oil droplets forcing greater entrainment of the oil into the water column below the sea surface. Has ability to reduce volatile organic compounds in the vicinity of a spill, making the area safer for responders. It typically requires smaller volumes of dispersant to be used as it has a higher encounter rate with the hydrocarbons than surface application.	Provides functionality, availability, reliability, survivability, compatibility and independence.	Costs associated with vessel contract	**In effect**
Subsea First Response Toolkit (SFRT) The SFRT includes debris clearance	AMOSC SFRT stored at Oceaneering yard in Jandakot and can be transported to Dampier. It is estimated this would take 10 hours to arrange and up to 4-5 days to load and transport to Dampier, depending on the time of the year. A suitable vessel would be acquired by Santos during this timeframe and arrive in Dampier	In effect	Equipment	SSDI can break-up oil droplets forcing greater entrainment of the oil into the water column below the sea surface. Has ability to reduce volatile organic compounds in the vicinity of a spill, making the area safer for responders.	Provides functionality, availability, reliability, survivability, compatibility and independence. Availability - whilst the SFRT takes several days to mobilise to site and conduct initial surveys, this	Cost of AMOSC membership for SFRT	**In effect**

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
equipment and subsea dispersant equipment, including a dedicated dispersant stockpile (500 m³ of Dasic Slickgone NS) and ancillary equipment (e.g., pumps, flying leads, coiled tubing head, dispersant wands).	within 7-8 days of call-out. Once the equipment is loaded, the vessel will mobilise to site and be ready to commence operations by day 8-9 from call out.				timeframe is considered reasonable given the technical nature of this equipment.		
	Purchase of Santos SFRT to be located at Exmouth or Dampier	Improved	Equipment	Reduces mobilisation time between storage and port of deployment (Dampier) by approx. 48 hrs	Improved availability however limited by vessel availability to deploy	Cost of SFRT purchase, storage and maintenance	**Reject** SFRT is estimated to arrive in Dampier only 2-3 days before vessel. Taking into account the significant costs of purchasing and maintaining a Santos-owned SFRT, an improvement of 2-3 days mobilisation time is not considered to provide a proportionate benefit.
	Relocate AMOSC SFRT to Dampier	Improved	Equipment	Reduces mobilisation time between storage and port of deployment (Dampier) by approx. 48 hrs	Improved availability however limited by vessel and personnel availability to deploy	AMOSC unable to alter storage location of SFRT as this could negatively impact other members	**Reject** Positioning of SFRT in Dampier in order to reduce deployment time was assessed but was found to be disproportionate in terms of costs to the reduction in risk gained and may adversely affect other SFRT members and their committed deployment times.
	Subsea bladder dispersant system positioned next to well site (edit to make sure it doesn't refer to seabed)	Alternative	Equipment	Subsea dispersant bladder system can be prepositioned and operate remotely if SSDI is determined a suitable strategy via an operational NEBA. Bladder systems are positioned in framed housings next to the well site. Autonomous application could commence by Day 1-2, reducing application times by 7-8 days.	Possible improved availability and independence, however technical development and procurement would be required as existing components in the market would need to be combined to develop this system. Placing bladders adjacent to the well site exposes them to risk of damage from debris in the event of a loss of well control. Additionally, bladder systems require extensive equipment and fluid deployment/recovery operations at each wellsite, exposing personnel to significant additional HES risks. Therefore, the design and development of this technology includes a high degree of uncertainty. Subsea bladders also have limited volume capacity, meaning this alternative would offer a short-term application option until SSDI arrives via the SFRT.	Purchase of bladder system on top of SFRT membership as both systems would still be required.	**Reject** Subsea bladder systems are an unproven technology and bring additional risks to the environment and personnel. In addition, the cost of having a subsea bladder system in place is a fixed cost, regardless of if a spill were to occur or not.
WWC Subsea Dispersant Injection (SSDI) system	WWC SSDI system package is based in Singapore would arrive onsite by day 15, commencing application day 15-16	In effect	Equipment	SSDI can break-up oil droplets forcing greater entrainment of the oil into the water column below the sea surface. Has ability to reduce volatile organic compounds in the vicinity of a spill, making the area safer for responders.	Provides functionality, availability, reliability, survivability, compatibility and independence. Availability - whilst the SSDI package takes several days to mobilise to site, this timeframe is considered reasonable given the	Cost of contract with WWC	**In effect**

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
					technical nature of this equipment.		
Subsea dispersant injection - planning	Source Control Planning and Response Guideline (DR-00-OZ-20001).	In effect	Procedure	Provides a set process top follow for the mobilisation of SFRT and suitable vessel by Santos Source Control Team thereby reducing the timeframe and increasing the effectiveness of SFRT.	Provides functionality, availability, reliability, survivability, compatibility and independence	Effort in updating and maintaining document	**In effect**
Subsea dispersant injection - vessels	Level 1: Suitable vessel sourced through Santos contractors. Vessel requirements outlined in Santos Source Control Planning and Response Guideline (DR-00-ZF-1001).	In effect	Equipment	Enhance subsea dispersion and biodegradation of hydrocarbons. Consideration given to harmful impacts of chemical dispersants	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; early vessel availability	Cost of existing contracts with vessel providers	**In effect**
	Level 2: Suitable vessel sourced through any regional contractors and monitored through WA Vessel Tracking System.	In effect	Equipment	Enhance subsea dispersion and biodegradation of hydrocarbons. Consideration given to harmful impacts of chemical dispersants	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; early vessel availability	Cost of vessel monitoring. Cost of contracts at the time of requirement.	**In effect**
	Level 3: Suitable vessel sourced as Vessels of Opportunity.	In effect	Equipment	Enhance subsea dispersion and biodegradation of hydrocarbons. Consideration given to harmful impacts of chemical dispersants	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; early vessel availability	Cost of contracts at the time of requirement.	**In effect**
	Enable improved vessel access by contracting a suitable, dedicated vessel on standby	Improved	Equipment	This alternative would result in SSDI commencing on Day 5-6, instead of Day 8-9 as vessel would be in Dampier on standby. Although this would treat released hydrocarbons for an additional 3 days, this would have a negligible reduction in shoreline accumulation volumes at protection priorities.	Improved availability and reliability	Costs associated with having a suitable vessel on contract and standby in Dampier - $50-60K USD/day.	**Reject** Removes bottleneck of having to wait 3 days for a suitable vessel. However, the cost of having a vessel on standby is a fixed cost, regardless of if a spill were to occur or not. The time saving of 3 days is not proportionate to the expense incurred, especially as SSDI is not anticipated to significantly reduce shoreline accumulation volumes if it were applied for an additional 3 days.
Subsea dispersant injection - personnel	Oceaneering personnel for the deployment of the SFRT	Additional	People,	Enhance subsea dispersion and biodegradation of hydrocarbons. Consideration given to harmful impacts of chemical dispersants	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; none identified	Cost of Oceaneering contract for personnel	In effect
Subsea dispersant injection - dispersant stocks	Level 2: Dedicated SFRT dispersant stockpile stored with SFRT at Jandakot (AMOSC, 500m3 Dasic Slickgone NS). Additional dispersant stocks stored at Exmouth (AMOSC, 75 m Slickgone NS); Dampier (AMSA,	Additional	Equipment	Enhance subsea dispersion and biodegradation of hydrocarbons. Consideration given to harmful impacts of chemical dispersants	Provides functionality, availability, reliability, survivability, compatibility and independence	Costs of contracts, MOU with AMOSC, AMSA	In effect

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
	20m3); Broome (AMOSC, 15m3 Ardrox), Fremantle (AMOSC, 35m3 Corexit, 250m3 Slickgone NS) (AMSA, 100m3). Available within 24 hours.				Availability exceeds requirements		
	Level 3: Dispersant stocks stored at national stockpiles (AMOSC, 139m3) (AMSA, 250m3) OSRL dispersant stocks available in Singapore (50% of 700m3 as SLA and 5000m3 as a subscriber to the Global Dispersant Stockpile) Mobilisation times depend on location.	Additional	Equipment	Enhance subsea dispersion and biodegradation of hydrocarbons. Consideration given to harmful impacts of chemical dispersants	Provides functionality, availability, reliability, survivability, compatibility and independence Availability exceeds requirements	Costs of contracts, MOUs with AMOSC, AMSA, OSRL	In effect
	Develop and maintain dispersant supply and logistics plan to ensure worst case LOWC SSDI requirements can be met	Additional	Equipment	Ensure capacity to meet worst case requirements	Allows Santos to meet worst case requirement	Costs of contracts, MOUs with AMOSC, AMSA, OSRL Cost of maintaining updated supply and logistics plan	**Accept** Allows for clear oversight of available stockpiles and capacity to meet requirements
	Access to additional dispersant stockpiles owned by Santos	Additional	Equipment	No additional environmental benefit if surplus to requirements	Improved availability and reliability	Additional cost for purchase and maintenance of stockpiles	**Reject** Analysis indicates that dispersant supplies accounted for in supply and logistics plan is sufficient. Santos is already subscribing to OSRL stockpiles in excess of 5,000m3.
	Rent dispersant stockpiles and place in Dampier	Additional	Equipment	No additional environmental benefit as existing dispersant stockpiles can be relocated to Dampier and dispersant manufacture can commence in a timeframe where dispersant demand does not exceed supply.	Availability already meets requirements	Additional cost for renting dispersant stockpiles	**Reject** Analysis indicates that timeframes for mobilising and relocating dispersant supplies are sufficient.
Dispersant effectiveness monitoring	To assess the effectiveness of dispersant application, Santos will use the Industry Recommended Subsea Dispersant Monitoring Plan (API, 2020) to determine the efficacy of subsea dispersant application.	In effect	Procedure	The Industry Recommended Subsea Dispersant Monitoring Plan (API, 2020) to assist in characterising the nature and extent of subsea or near surface dispersed oil, aid in the validation and accuracy of plume trajectory models and allow for rapid quantification of data to enable the IMT to make decisions about continuation of dispersant application. The IMT assesses the effectiveness of continued dispersant use against an operational NEBA assessment.	Provides functionality, availability, reliability, survivability, compatibility and independence	Cost of contracts to provide monitoring capability	**In effect**
Surface Dispersants- Adopted controls and standards are found in Section 13.8							
Vessel based surface chemical dispersant application-spray systems	Level 2: Vessel spray systems from Exmouth (WA, 3*Afedo; AMOSC, 1*Afedo, 1*Vikospray), Dampier/ Karratha (WA, 3*Afedo; AMSA, 2*Ayles Fernie), Broome (AMOSC, 2*Afedo) Fremantle (AMOSC, 5*Afedo, 1*Global) Vessel spray system equipment mobilised to deployment port within 12 hrs. Transit times (vessel): Transit times (road):	In effect	Equipment	Enhance biodegradation of hydrocarbons and reduce the impact of surface hydrocarbons on protection priorities. Consideration given to harmful impacts of chemical dispersants.	Provides functionality, availability, reliability, survivability, compatibility and independence Area for improvement; none identified	Cost of equipment purchase and maintenance Costs of membership and MOUs with AMOSC, AMSA	**In effect**

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
	Fremantle to Port Hedland = ~24 hrs Fremantle to Karratha = ~24 hrs						
	Level 3: Vessel spray systems from Geelong (AMOSC, 3*Afedo, 3*Vikospray), Singapore (OSRL, 10*systems, additional systems stored at global stockpiles) Transit time (road/ air) Geelong or Singapore to Exmouth or Karratha = 3–5 days	In effect	Equipment	Enhance biodegradation of hydrocarbons and reduce the impact of surface hydrocarbons on protection priorities. Consideration given to harmful impacts of chemical dispersants.	Provides functionality, availability, reliability, survivability, compatibility and independence Area for improvement; none identified	Costs of membership with AMOSC, OSRL	**In effect**
	Access to additional spray systems stored in Port Hedland, Broome, Karratha, Exmouth or Dampier	Additional	Equipment	Additional spray systems could increase encounter rate with fresh hydrocarbons	Improved availability and reliability	Additional cost for purchase and maintenance of vessel spray systems	**Reject** Spray systems are already available at these locations. Mobilisation time for spray systems from Fremantle is less than 48 hours
	Access to additional spray systems with dispersant stored on vessels	Additional	Equipment	Additional spray systems could increase encounter rate with fresh hydrocarbons	Improved availability and reliability	Additional cost for purchase and maintenance of vessel spray systems. Cost and maintenance of dispersant stock. Storage of equipment on vessels may impede vessel functionality. Storage of equipment on vessels may prevent vessels from being used by other clients. Training for vessel crew.	**Reject** Spray systems could be rapidly mobilised from Dampier and Exmouth. Vessels are multi tasked, hence there is no guarantee that the vessel with spray storage would be in the right place at the right time.
Vessel based surface chemical dispersant application-vessels	Level 1: vessels in use by WA and located at (or in transit to) Ningaloo Vision, Exmouth, Dampier or Varanus Is. Suitable Dispersant Vessels mobilised to nearest deployment port (Port Hedland, Dampier or Exmouth) within 12 hrs.	In effect	Equipment	Enhance biodegradation of hydrocarbons and reduce the impact of surface hydrocarbons on protection priorities. Consideration given to harmful impacts of chemical dispersants.	Provides functionality, availability, reliability, survivability, compatibility and independence Area for improvement; vessel availability	Cost of existing contracts with vessel providers	**In effect**
	Level 2: vessels sourced through Master Service Agreement, located in region and tracked by WA Vessel Monitoring System	In effect	Equipment	Enhance biodegradation of hydrocarbons and reduce the impact of surface hydrocarbons on protection priorities. Consideration given to harmful impacts of chemical dispersants.	Provides functionality, availability, reliability, survivability, compatibility and independence Area for improvement; vessel availability	Cost of vessel monitoring. Cost of contracts at the time of requirement.	**In effect**
	Level 3: vessels sourced without existing contracts from any location	In effect	Equipment	Enhance biodegradation of hydrocarbons and reduce the impact of surface hydrocarbons on protection priorities. Consideration given to harmful impacts of chemical dispersants.	Provides functionality, availability, reliability, survivability, compatibility and independence Area for improvement; vessel availability	Cost of contracts at the time of requirement.	**In effect**
	Access to additional vessels by contracting vessels to remain on standby for chemical dispersion	Additional	Equipment	Additional vessels with spray systems could increase encounter rate with fresh hydrocarbons	Improved functionality, availability and reliability	Cost of vessel purchase or cost of contract to engage vessel on standby	**Reject** Cost is disproportionate to benefit. Multiple vessels in the region are tracked and could be contracted at short notice.

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
	Define spray vessel specifications and input this information to improve vessel tracking	Improved	System	More accurate vessel tracking may lead to faster mobilisation times could improve dispersant efficacy.	Improved functionality, availability and reliability	Cost and effort to gather and input data	**Accept** Cost is proportionate to benefit
Vessel based surface chemical dispersant application-personnel	Level 2: Spill responders from Varanus Is., Devil Creek, Perth (WA), Fremantle (AMOSC staff), Perth (AMOSC Core Group). Santos Offshore Core Group mobilised to deployment port (Exmouth and/or Dampier) within 12 hrs. For personnel numbers refer to **Appendix T**: Cumulative Response Capability Assessment	In effect	People	Enhance biodegradation of hydrocarbons and reduce the impact of surface hydrocarbons on protection priorities. Consideration given to harmful impacts of chemical dispersants	Provides functionality, availability, reliability, survivability, compatibility and independence Availability - WA access to helo services ensures that regional personnel can be quickly mobilised to the appropriate port. Area of improvement; none identified	Cost of employing and training Santos Core Group Costs of membership, MOUs with AMOSC staff and AMOSC core group personnel	**In effect**
	Level 3: Spill responders from Geelong (AMOSC staff), interstate (AMOSC Core Group; AMSA) and international (OSRL). Interstate staff available from 2 to 3 days. OSRL staff initial 5 technical advisors available from 2 to 3 days, remaining personnel available from 4 to 5 days, subject to approvals/ clearances.	In effect	People	Enhance biodegradation of hydrocarbons and reduce the impact of surface hydrocarbons on protection priorities. Consideration given to harmful impacts of chemical dispersants	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; none identified	Costs of membership with OSRL	**In effect**
	Faster access to response personnel via Santos employment of local personnel in locations such as Port Hedland, Broome, Karratha or Exmouth	Improved	People	Improve mobilisation time	Improved availability and reliability	Costs associated with personnel employment and training	**Reject** Cost of permanently employing personnel is grossly disproportionate to benefits of availability in initial 24 hours following incident. Personnel from regional facilities (Varanus Is., Devil Creek) can be quickly transported by helicopter.
	Santos to contract personnel from Exmouth freight and logistics to deploy and operate vessel spray systems	Additional	People	Improve mobilisation time	Improved availability and reliability. Skills required to mount and operate equipment and perform preliminary checks of dispersant effectiveness could be obtained through basic training.	Costs associated with increasing scope of existing contract with Exmouth Freight and Logistics. Personnel training.	**Reject** **Cost is proportionate to benefit.**
	Just-In-Time training to train personnel for spill response roles	Additional	People	Greater capacity for vessel based dispersant application in the later stages of response	Improved availability and reliability, lower dependence	High cost of training at time of requirement. It may be difficult to identify trainees with appropriate prior skill sets such as maritime experience.	**Accept** IMT has scope to evaluate and implement training if required. Creates a contingency plan to access trained personnel in numbers above the expected requirement
	Arrangements for staff from an additional oil spill personnel provider	Additional	Personnel	Greater capacity for vessel based dispersant application in the later stages of response	Improved availability and reliability, lower dependence	Time and cost of management	**Accept** The Response Group will increase available numbers of personnel with the appropriate experience and skill set
Aerial based surface chemical dispersant	Level 2: Access to Fixed Wing Aerial Dispersant Aircraft equipment and personnel through AMOSC under contract conditions. AMOSC to mobilise Fixed Wing aircraft to	In effect	Equipment, people, system	Enhance biodegradation of hydrocarbons and reduce the impact of surface hydrocarbons on protection priorities. Consideration	Provides functionality, availability, reliability, survivability, compatibility and independence	Costs of membership with AMOSC	**In effect**

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
application-aircraft	nominated airbase within 12 hrs. First FWADC test spray within 48 hrs.			given to harmful impacts of chemical dispersants.	Area for improvement: none identified		
	Level 3: Access to aircraft (C130 or B727) for aerial application system through OSRL. C130 available in Karratha or Learmonth within 23 hrs.	In effect	Equipment, people, system	Enhance biodegradation of hydrocarbons and reduce the impact of surface hydrocarbons on protection priorities. Consideration given to harmful impacts of chemical dispersants.	Provides functionality, availability, reliability, survivability, compatibility and independence Area for improvement: none identified	Costs of membership with OSRL	**In effect**
	Access to aircraft via additional service provider	Alternate	Equipment, people, system	Increased volume of hydrocarbons treated with chemical dispersant	Improved availability and reliability	Cost for contract with additional service provider. Potential challenges in managing safety interactions of two different service providers	**Reject** The current contracts with AMOSC and OSRL meet requirements for aerial based application based on a ramp up to 2 FWADC aircraft from 48 hours followed by additional OSRL aircraft if required, which is considered achievable based on resourcing arrangements.
Aerial based surface chemical dispersant application-personnel	Level 2: Aerial Attack Supervisor sourced by AMOSC. AMOSC to mobilise all FWADC capability personnel to nominated airbase within 48 hours.	In effect	People	Enhance biodegradation of hydrocarbons and reduce the impact of surface hydrocarbons on protection priorities. Consideration given to harmful impacts of chemical dispersants.	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; none identified	Costs of membership with AMOSC and aerial service provider	**In effect**
	Level 3: Pilots, spill specialists sourced through OSRL. OSRL staff initial 5 technical advisors available from 2 to 3 days, remaining personnel available from 4 to 5 days.	In effect	People	Enhance biodegradation of hydrocarbons and reduce the impact of surface hydrocarbons on protection priorities. Consideration given to harmful impacts of chemical dispersants	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; none identified	Costs of membership with OSRL	**In effect**
Dispersant stocks	Level 2: Dispersant stocks from Exmouth (AMOSC, 75 m Slickgone NS); Dampier (AMSA, 20m3); Broome (AMOSC, 15m3 Ardrox), Fremantle (AMOSC, 35m3 Corexit, 250m3 Slickgone NS; AMSA, 100m3). Dispersants mobilised to deployment port within 12 hrs.	In effect	Equipment	Enhance biodegradation of hydrocarbons and reduce the impact of surface hydrocarbons on protection priorities. Consideration given to harmful impacts of chemical dispersants	Provides functionality, availability, reliability, survivability, compatibility and independence Availability exceeds requirements	Costs of membership, MOUs with AMOSC, AMSA.	**In effect**
	Level 3: Dispersant stocks from national stockpiles (AMOSC, 139m3) (AMSA, 250m3) and Singapore (OSRL, 350m3 (50% of 700m3) as SLA and 5000m3 as a subscriber to the Global Dispersant Stockpile). Transit time (road/ air) Geelong or Singapore to Exmouth or Karratha = 3–5 days UK or other OSRL bases to Karratha = 7-10 days	In effect	Equipment	Enhance biodegradation of hydrocarbons and reduce the impact of surface hydrocarbons on protection priorities. Consideration given to harmful impacts of chemical dispersants	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; none identified. Availability exceeds requirements	Costs of memberships, MOUs with AMOSC, AMSA, OSRL	**In effect**
	Access to additional dispersant stockpiles owned by Santos	Additional	Equipment	No additional environmental benefit if surplus to requirements	Improved availability and reliability	Additional cost for purchase and maintenance of stockpiles	**Reject** Resource Needs Analysis indicates that dispersant supplies sufficient for worst case oil treatment can be met through

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
							Australian stockpiles within required timeframes. International stockpiles also available.
	Develop and maintain dispersant supply and logistics plan to ensure worst case LOWC SDA requirements can be met	Accept	Equipment	Ensure capacity to meet worst case requirements	Allows Santos to meet worst case requirement	Costs of contracts, MOUs with AMOSC, AMSA, OSRL Cost of maintaining updated supply and logistics plan	**Accept** Allows for clear oversight of available stockpiles and capacity to meet requirements
Protection and Deflection - Adopted controls and standards are found in Section 13.8							
Protection and deflection- booms and ancillary equipment	Level 2: Shoreline and nearshore booms plus ancillary equipment from Varanus Is. (Santos, 8*Beach Guardian, 16*25m Zoom Boom, 2*skimmer), Exmouth (AMOSC, 20*25m Beach Guardian, 20*25m Zoom Boom, 2 skimmers), Dampier (Santos, 1*skimmer; AMSA, 5* Canadyne Inflatable, 10* Structureflex Inflatable, 5* Versatech Zoom Inflatable, 2 Slickbar Solid Buoyancy, 3*Structureflex Solid Buoyancy, 30* Structureflex Land Sea), Fremantle (AMOSC, 23*35m Beach Guardian, 30*25m Zoom Boom, 18* Curtain Boom, 1*skimmer; AMSA, 15*Structureflex Inflatable, 13*Versatech Zoom Inflatable, 10*Structureflex Solid Buoyancy, 30* Structureflex Land Sea), Broome (AMOSC, various equipment). Vehicles sourced from local hire companies. Transit times (vessel): Varanus Is. to Port Hedland = X hrs, Varanus Is. to Karratha = X hrs Varanus Is. to Exmouth = 18 hrs Transit times (road) Fremantle to Exmouth = ~24 hrs Fremantle to Karratha = ~24 hours Fremantle to Port Hedland = ~24 hours Dampier/ Karratha to Exmouth = 7 hrs Exmouth to North West Cape = 0.5 hr. Protection booming equipment mobilised to FOB location within 12 hrs.	In effect	Equipment	Reduce hydrocarbon contact with coastal protection priorities. Consideration given to harmful impacts of boom, vessels, vehicles and personnel on sensitive coastal ecology	Provides functionality, availability, reliability, survivability, compatibility and independence Area for improvement; none identified	Costs associated with equipment purchase and maintenance Costs of contracts, MOUs with AMOSC and AMSA	**In effect**
	Level 3: Shoreline and nearshore booms plus ancillary equipment from Geelong (AMOSC), interstate (AMSA) and Singapore (OSRL). Transit times (road/ air) Geelong or Singapore to Exmouth or Karratha = 3–5 days. These resources in place to commence protection and deflection within 3-10 days.	In effect	Equipment	Reduce hydrocarbon contact with coastal protection priorities. Consideration given to harmful impacts of boom, vessels, vehicles and personnel on sensitive coastal ecology	Provides functionality, availability, reliability, survivability, compatibility and independence Area for improvement; none identified	Costs associated with equipment purchase and maintenance Costs of contracts, MOUs Costs associated with staff training	**In effect**
	Santos to purchase additional shoreline and nearshore booms and ancillary equipment	Additional	Equipment	Enable more protection and deflection operations to occur simultaneously to protect more key areas	Improved availability and reliability	Costs associated with equipment purchase and maintenance	**Reject** Sufficient quantities of equipment located in the region.

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
Protection and deflection-vessels	Level 1: Shallow draft vessels in use by Santos and located at (or in transit to) Ningaloo Vision, Exmouth, Dampier or Varanus Is. Boom deployment vessel / remote island transfer vessel mobilised to FOB location/ port within 12 hrs.	In effect	Equipment	Reduce hydrocarbon contact with coastal protection priorities. Consideration given to harmful impacts of boom, vessels, vehicles and personnel on sensitive coastal ecology	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; early vessel availability	Cost of existing contracts with vessel providers	**In effect**
	Level 2: Shallow draft vessels sourced through Master Service Agreement, located in region	In effect	Equipment	Reduce hydrocarbon contact with coastal protection priorities. Consideration given to harmful impacts of boom, vessels, vehicles and personnel on sensitive coastal ecology	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; vessel availability	Cost of vessel monitoring. Cost of contracts at the time of requirement.	**In effect**
	Level 3: Shallow draft vessels sourced without existing contracts from any location	In effect	Equipment	Reduce hydrocarbon contact with coastal protection priorities. Consideration given to harmful impacts of boom, vessels, vehicles and personnel on sensitive coastal ecology	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; vessel availability	Cost of contracts at the time of requirement.	**In effect**
	Maintain a list of small vessel providers for nearshore booming	In effect	Equipment	Reduce hydrocarbon contact with coastal protection priorities. Consideration given to harmful impacts of boom, vessels, vehicles and personnel on sensitive coastal ecology	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; vessel availability	Cost of contracts at the time of requirement.	**In effect**
	Access to additional shallow draft boom tow vessels owned by Santos	Additional	Equipment	Faster response times to facilitate protection of key sensitive areas	Improved availability and reliability	Costs of vessel purchase and maintenance	**Reject** High numbers of shallow draft vessels located in the region. One vessel can help to set boom at multiple locations.
	Provision for shallow draft boom tow vessels added to Master Service Agreement	Improved	Equipment	Reduce time required to source vessels and crew in initial phase of response. Improve mobilisation time, potential for response operations at more locations	Improved availability and reliability	Time involved in providing vessel specifications and liaising with existing suppliers	**Accept**
Protection and deflection-personnel	Level 2: Spill responders from Varanus Is., Devil Creek, Perth (Santos), Fremantle (AMOSC staff), Perth (AMOSC Core Group). Santos Offshore Core Group mobilised to Exmouth within 12 hrs. AMOSC Staff and Industry Core Group mobilised to FOB within 24 hrs. For personnel numbers refer to **Appendix T**: Cumulative Response Capability Assessment	In effect	Personnel	Reduce hydrocarbon contact with coastal protection priorities Consideration given to harmful impacts of boom, vessels, vehicles and personnel on sensitive coastal ecology	Provides functionality, availability, reliability, survivability, compatibility and independence Availability - Santos access to helo services ensures that regional personnel can be quickly mobilised to the appropriate location. Area for improvement; none identified	Costs of contracts, MOUs with AMOSC, AMSA Costs associated with staff training	**In effect**
Protection and deflection-personnel	Level 3: Spill responders from Geelong (AMOSC staff), interstate (AMOSC Core Group; AMSA, and international (OSRL). Interstate staff available from 2 to 3 days. OSRL	In effect	Personnel	Reduce hydrocarbon contact with coastal protection priorities Consideration given to harmful	Provides functionality, availability, reliability, survivability, compatibility and independence	Costs of contracts, MOUs with AMOSC, AMSA, OSRL Costs associated with staff training	**In effect**

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
	staff initial 5 technical advisors available from 2 to 3 days, remaining personnel available from 4 to 5 days, subject to approvals/ clearances. For personnel numbers refer to **Appendix T**: Cumulative Response Capability Assessment			impacts of boom, vessels, vehicles and personnel on sensitive coastal ecology	Area for improvement; none identified		
	Ensure trained personnel based at strategic locations such as Port Hedland, Broome, Karratha or Exmouth	Improved	Personnel	Faster response times to facilitate protection of key sensitive areas	Improved availability and reliability	Costs associated with staff employment and training	**Reject** No Santos personnel currently based at Port Hedland, Broome, Karratha or Exmouth so employment costs would be significant and not justified given that helicopters enable rapid transportation of Santos staff within the region.
	Just-In-Time training to train personnel for spill response roles	Additional	People	Greater capacity for protection and deflection in the later stages of response	Improved availability and reliability, lower dependence	High cost of training at time of requirement. It may be difficult to identify trainees with appropriate prior skill sets such as maritime experience.	**Accept** IMT has scope to evaluate and implement training if required. Creates a contingency plan to access trained personnel in numbers above the expected requirement
	Arrangements for staff from an additional oil spill personnel provider	Additional	Personnel	Greater capacity for protection and deflection in the later stages of response	Improved availability and reliability, lower dependence	Time and cost of management	**Accept** The Response Group will increase available numbers of personnel with the appropriate experience and skill set
Protection and deflection-planning	Ningaloo Coast shoreline sensitivity and access data/maps and TRPs	In effect	Procedures	Reduce hydrocarbon contact with coastal protection priorities Consideration given to harmful impacts of boom, vessels, vehicles and personnel on sensitive coastal ecology	Provides functionality, availability, reliability, survivability, compatibility and independence	Cost of document preparation and maintenance	**In effect**
	Review of shoreline sensitivity mapping. Review of TRPs and development of additional TRPs for key locations	Improved, additional	Procedures	Improved level of response planning to streamline resourcing and logistics and effect a better response	Improved functionality	Cost involved in revision of sensitivity mapping and TRPs and preparation of additional TRPs	**Accept – Control, Performance standard included in 8.3** Bedout island and Karratha-Port Hedland have short time to contact <10 days, with predicted high shoreline loading. Stakeholder engagement indicated further environmental sensitivities with Bedout island (further detailed in the EP, Table 4-2). The short time to contact requires pre planning prior to contact. A TRP will be written for Bedout Island and Karratha-Port Hedland prior to drilling. Current maps/plans are adequate to initiate an effective response for all other receptors. Plans will have to be reassessed at the time of the incident, to take into account variables such as weather and tides.
Shoreline Clean-up - Adopted controls and standards are found in Section 15							
Shoreline Clean-up - equipment	Level 1: Manual clean-up equipment from local hardware outlets. Decontamination/staging equipment from	In effect	Equipment	Remove stranded hydrocarbons from shorelines in order to reduce impact on coastal protection priorities and	Provides functionality, availability, reliability, survivability, compatibility and	Cost of equipment purchase and hire at the time of incident	**In effect**

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
	Exmouth (AMOSC, 1*decon. station). Mobile plant from local hire companies. PPE from Exmouth (Santos, 1*container). Clean-up equipment mobilised to location within 12 hrs.			facilitate habitat recovery. Consideration given to negative impacts of equipment and personnel on sensitive coastal ecology	independence Area for improvement - availability - rapid mobilisation of equipment in initial 48 hours of incident	Cost of membership with AMOSC	
	Level 2: Manual clean-up and flushing equipment from Varanus Is. (Santos, 1*container), Fremantle (AMOSC, 1*shoreline support kit and 1*flushing kit) and state hardware outlets. Decontamination/staging equipment from Karratha (AMSA; 2*decon. stations) and Fremantle (AMOSC, 1*decon. station; AMSA, 2* decon. stations). Mobile plant from state hire companies. PPE from Dampier and Varanus Is (Santos, 2*containers) and Fremantle (AMOSC, 1*container, 2*gas detectors). Transit times (vessel): Varanus Is. to Exmouth = 18 hrs, Transit times (road) Fremantle to Exmouth = ~24 hrs Dampier/ Karratha to Exmouth = 7 hrs Resources in place to commence shoreline clean-up within 1–3 days	In effect	Equipment	Remove stranded hydrocarbons from shorelines in order to reduce impact on coastal protection priorities and facilitate habitat recovery. Consideration given to negative impacts of equipment and personnel on sensitive coastal ecology	Provides functionality, availability, reliability, survivability, compatibility and independence Area for improvement - availability - procurement and mobilisation of equipment	Cost of equipment purchase and hire at the time of incident Cost of equipment purchase and maintenance Cost of contract with AMOSC	**In effect**
	Level 3: Manual clean-up and flushing equipment from Geelong (AMOSC, 1*shoreline support kit, 1* flushing kit, 1*shoreline impact lance kit), Singapore (OSRL) and national hardware outlets. Decontamination/ staging equipment from Geelong (AMOSC, 1*decon. station). Mobile plant sourced from national hire companies. PPE from Geelong (AMOSC, 1*container, 7*gas detectors). Transit time (road/ air) Geelong or Singapore to Exmouth or Karratha = 3–5 days	In effect	Equipment	Remove stranded hydrocarbons from shorelines in order to reduce impact on coastal protection priorities and facilitate habitat recovery. Consideration given to negative impacts of equipment and personnel on sensitive coastal ecology	Provides functionality, availability, reliability, survivability, compatibility and independence Area for improvement - availability - procurement and mobilisation of equipment	Cost of equipment purchase and hire at the time of incident Cost of equipment purchase and maintenance Cost of memberships with AMOSC and OSRL	**In effect**
	Mechanical mobile plant equipment for clean-up pre purchased and positioned at strategic locations such as Port Hedland, Broome, Karratha or Exmouth	Additional	Equipment	Environmental benefits and impacts are dependent on hydrocarbon fate and local ecology. Reduced mobilisation times and improved access would assist, should mobile plant be deemed advantageous	Improved availability and reliability	Costs associated with equipment purchase and maintenance	**Reject** there is a high likelihood that mobile plant equipment is not used due to negative environmental impacts, leaving purchased equipment unutilised and costs disproportionate Locally available hire plant can be used. Additional plant could be purchased and mobilised from Perth if required
	Prepurchase and storage of equipment (decontamination/ staging equipment, clean-up	Additional	Equipment	Improve mobilisation time, potential for more response locations	Improved availability and reliability	Cost in purchase and maintenance of equipment	**Reject** Equipment for first strike available at Exmouth.

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
	and flushing, PPE) at strategic locations such as Port Hedland, Broome, Karratha or Exmouth						Additional equipment can be mobilised to Port Hedland, Broome, Karratha or Exmouth in less than 24 hours.
Shoreline Clean-up - vessels	Level 1: Shallow draft vessels in use by Santos and located at (or in transit to) Ningaloo Vision, Exmouth, Dampier or Varanus Is. Remote island transfer vessel mobilised to FOB location/ port within 12 hrs.	In effect	Equipment	Remove stranded hydrocarbons from shorelines in order to reduce impact on coastal protection priorities and facilitate habitat recovery. Consideration given to negative impacts of equipment and personnel on sensitive coastal ecology	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; early vessel availability	Cost of existing contracts with vessel providers	**In effect**
	Level 2: Shallow draft vessels sourced through Master Service Agreement, located in region and tracked by Santos Vessel Monitoring System	In effect	Equipment	Remove stranded hydrocarbons from shorelines in order to reduce impact on coastal protection priorities and facilitate habitat recovery. Consideration given to negative impacts of equipment and personnel on sensitive coastal ecology	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; vessel availability	Cost of vessel monitoring. Cost of contracts at the time of requirement.	**In effect**
	Level 3: Shallow draft vessels sourced without existing contracts from any location	In effect	Equipment	Remove stranded hydrocarbons from shorelines in order to reduce impact on coastal protection priorities and facilitate habitat recovery. Consideration given to negative impacts of equipment and personnel on sensitive coastal ecology	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; vessel availability	Cost of contracts at the time of requirement.	**In effect**
	Access to additional shallow draft vessels owned by Santos to transport personnel to key sensitive areas on offshore islands and emergent reefs such as Bedout Island, Ashmore Reef, Imperieuse Reef MP, Clerke Reef MP and Murion Islands	Additional	Equipment	Faster response times to facilitate protection of key sensitive areas on offshore islands	Improved availability and reliability	Costs of vessel purchase and maintenance	**Reject** High numbers of shallow draft vessels located in the region. One vessel can help to set boom at multiple locations.
	Provision for shallow draft vessels added to Master Service Agreement	Improved	Equipment	Reduce time required to source vessels and crew in initial phase of response. Improve mobilisation time, potential for response operations at more locations	Improved availability and reliability. Improve capacity for Santos to source shallow draft vessels	Time involved in providing vessel specifications and liaising with existing suppliers	**Accept**
Shoreline Clean-up - personnel	Level 2: Clean-up team leaders from Varanus Is., Devil Creek, Perth (Santos), Fremantle (AMOSC staff), Perth (AMOSC Core Group). Santos Offshore Core Group mobilised to Exmouth within 12 hrs. AMOSC Staff and Industry Core Group mobilised to FOB within 24 hrs. For personnel numbers refer to **Appendix T**: Cumulative Response Capability Assessment	In effect	People	Remove stranded hydrocarbons from shorelines in order to reduce impact on coastal protection priorities and facilitate habitat recovery. Consideration given to negative impacts of equipment and personnel on sensitive coastal ecology	Provides functionality, availability, reliability, survivability, compatibility and independence Area for improvement - availability - rapid mobilisation of personnel in initial 48 hours of incident	Costs associated with staff training Costs of membership, MoUs with AMOSC, AMSA	**In effect**
	Level 3: Clean-up team leaders from Geelong (AMOSC staff), interstate (AMOSC Core Group; AMSA, and international (OSRL). Interstate staff available from 2 to 3 days. OSRL staff initial 5 technical advisors available from 2 to 3 days, remaining personnel available from 4 to 5 days, subject to approvals/ clearances. For personnel numbers refer to **Appendix T**: Cumulative Response Capability Assessment	In effect	People	Remove stranded hydrocarbons from shorelines in order to reduce impact on coastal protection priorities and facilitate habitat recovery. Consideration given to negative impacts of equipment and personnel on sensitive coastal ecology	Provides functionality, availability, reliability, survivability, compatibility and independence Area for improvement - availability - rapid mobilisation of personnel	Costs associated with staff training Costs of membership, MoUs with AMOSC, AMSA	**In effect**

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
	Access to additional team leaders that are locally based at strategic locations (Port Hedland, Broome, Karratha and Exmouth) or can be mobilised within short time frames	Additional	People	Improve mobilisation time, potential for more response locations	Improved availability and reliability	Cost of employment and training of staff Cost of being locally based or on a rapid mobilisation plan	**Reject** Santos already employs trained oil spill responders in the region that can be mobilised to key areas by helicopter within short time frames.
	Clean-up labour personnel predominantly based in Perth.	In effect	People	Remove stranded hydrocarbons from shorelines in order to reduce impact on coastal protection priorities and facilitate habitat recovery. Consideration given to negative impacts of equipment and personnel on sensitive coastal ecology	Provides functionality, availability, reliability, survivability, compatibility and independence Area for improvement - availability - rapid mobilisation of personnel in initial 48 hours of incident	Costs of labour hire through existing service provider	**In Effect**
	Faster access to clean-up personnel via Perth based labour hire contractor	Improved	People	Improve mobilisation time, potential for response operations at more locations	Improved availability and reliability	Not feasible to mobilise labour hire personnel in less than 72 hours	**Reject** Not feasible to mobilise labour hire personnel in less than 72 hours
	Faster access to clean-up personnel via locally based labour hire companies or emergency response organisations	Improved	People	Improve mobilisation time, potential for response operations at more locations	Improved availability and reliability	No identified regional labour hire companies	**Reject** No identified regional labour hire companies
	Faster access to clean-up personnel via Santos employment of local personnel - Port Hedland, Broome, Karratha or Exmouth	Improved	People	Improve mobilisation time, potential for response operations at more locations	Improved availability and reliability	Costs associated with personnel employment and training	**Reject** Cost of permanently employing local personnel is grossly disproportionate to benefits of availability in initial phase of response.
	Just-In-Time training to train personnel for spill response roles	Additional	People	Greater capacity for shoreline clean-up in the later stages of response	Improved availability and reliability, lower dependence	High cost of training at time of requirement. Extended period prior to minimum shoreline contact provide window of opportunity to train workforce Trainees require minimal prior skills and will be easily sourced.	**Accept** A contingency plan to create a pool of trained personnel in the early stages of a response in numbers above the expected requirement.
	Arrangements for staff from an alternative oil spill personnel provider	Additional	Personnel	Greater capacity for shoreline clean-up in the later stages of response	Improved availability and reliability, lower dependence	Time and cost of management	**Accept** The Response Group will increase available numbers of personnel with the appropriate experience and skill set
Shoreline Clean-up - planning	Shoreline sensitivity mapping and TRPs	In effect	Procedures	Remove stranded hydrocarbons from shorelines in order to reduce impact on coastal protection priorities and facilitate habitat recovery. Consideration given to negative impacts of equipment and personnel on sensitive coastal ecology	Provides functionality, availability, reliability, survivability, compatibility and independence Area for improvement - availability - rapid mobilisation in initial 48 hours of incident	Cost associated with development and maintenance of mapping and TRPs	**In effect**
	Review of shoreline sensitivity mapping. Review of TRPs and development of additional TRPs for all PPAs	Improved, additional	Procedures	Improved level of response planning to streamline resourcing and logistics and effect a better response	Improved functionality	Cost involved in revision of sensitivity mapping and TRPs and preparation of additional TRPs	**Accept – Control, Performance standard included in 8.3** Bedout island and Karratha-Port Hedland have short time to contact <10 days, with predicted high shoreline loading. Stakeholder engagement indicated further environmental sensitivities with Bedout

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
							island (further detailed in the EP, Table 4-2). The short time to contact requires pre planning prior to contact. A TRP will be written for Bedout Island and Karratha-Port Hedland prior to drilling. Current maps/plans are adequate to initiate an effective response for all other receptors. Plans will have to be reassessed at the time of the incident, to take into account variables such as weather and tides.
Shoreline Clean-up response	Prioritise use of existing roads and tracks	In effect	Procedures	Reduced environmental impact as a result of shoreline access activities, improve response time and efficiency			**In effect**
	Soil profile assessment prior to earthworks	In effect	Procedures	Improved baseline information for shoreline condition	Improved functionality		**In effect**
	Pre-cleaning and inspection of equipment (quarantine)	In effect	Procedures	Reduced potential for contaminating environment during response activities	Improved functionality		**In effect**
	Use of Heritage Advisor if spill response activities overlap with potential areas of cultural significance	In effect	Procedures	Improved capacity to respond appropriately to areas of potential cultural significance	Improved functionality		**In effect**
	Select temporary base camps in consultation with DoT and DBCA	In effect	Procedures	Optimise response based on camp location, reduce environmental impact of camps	Improved functionality		**In effect**
	OSR Team Leader assessment/selection of vehicle appropriate to shoreline conditions	In effect	Procedures	Improved response efficiency	Improved functionality		**In effect**
	Establish demarcation zones for vehicle and personnel movement considering sensitive vegetation, bird nesting/roosting areas and turtle nesting habitat.	In effect	Procedures	Reduced environmental impact as a result of shoreline access activities	Improved functionality		**In effect**
	Operational restriction of vehicle and personnel movement to limit erosion and compaction	In effect	Procedures	Reduced environmental impact as a result of shoreline access activities	Improved functionality		**In effect**
	Stakeholder consultation	In effect	Procedures	Improved response efficiency	Improved functionality		**In effect**
Oiled Wildlife Response - Adopted controls and standards are found in Section 16							
Oiled wildlife response - planning	Implementation of the Western Australian Oiled Wildlife Response Plan (WAOWRP) and Pilbara Region Oiled Wildlife Response Plan	In effect	Procedure	Working within the guidelines of the WAOWRP and Pilbara regional plan will ensure a coordinated response and that the expectations of the Control Agency are met with the overall aim to increase the likelihood of success of the OWR (success in terms of wildlife survivorship and rates for release back into the wild).	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement- framework for how Santos will integrate with Control Agencies for OWR	Effort and time involved in developing OWR implementation plan within OPEP based on guidance from WAOWRP and Pilbara Regional Plan	**In effect**
	Santos Oiled Wildlife Response Framework; sets the corporate guidance for OWR preparedness and response and defines how Santos will integrate with Control Agencies to provide a coordinated response	In effect	Procedure	The framework is complementary to the WAOWRP and Pilbara Regional Plan and facilitates a rapid coordinated response, and the provision of resources by Santos in	Improved functionality and reliability.	Cost of document development and maintenance	**In effect**

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
				order to increase the likelihood of success of the OWR.			
Oiled wildlife response - equipment	Level 2 OWR kits and containers available from AMOSC, AMSA, DBCA or DoT in Exmouth, Darwin, Broome, Karratha, Fremantle, or Kensington. WA equipment (OWR containers) mobilised to Exmouth region within 24 hrs.	In effect	Equipment	Timely access to appropriate equipment is needed for the effective treatment of wildlife in order to increase the likelihood of success of the OWR	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; none identified	Cost of membership with AMOSC	**In effect**
	Level 3 OWR equipment available from OSRL. Transit times (road/ air) Singapore to Karratha = 3–5 days.	In effect	Equipment	Appropriate equipment is needed for the effective treatment of wildlife in order to increase the likelihood of success of the OWR	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; none identified	Cost of membership with OSRL	**In effect**
Oiled wildlife response - personnel	Level 1/2 Santos personnel trained in OWR. OWR trained personnel mobilised to Exmouth region within 24 hrs.	In effect	People	Timely access to skilled personnel will enhance the likelihood of success of an OWR.	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; ensure personnel are based not just in the Perth Office but also at VI and DC facilities	Cost of training and maintaining training	**In effect**
	Level 2 OWR personnel from AMOSC, AMOSC-activated Wildlife Response contractors, and Industry Mutual Aid. Mobilisation of OWR personnel to site will start to occur in 24-48 hours following notification of actual or imminent impact to wildlife.	In effect	People	Timely access to skilled personnel will enhance the likelihood of success of an OWR.	Provides functionality, availability, reliability, survivability, compatibility and independence Area for improvement - availability - rapid mobilisation of personnel in initial 48 hours of incident	Cost of membership with AMOSC	**In effect**
	Level 3 OWR personnel available through OSRL. OSRL staff initial 5 technical advisors available from 2 to 3 days, remaining personnel available from 4 to 5 days, subject to approvals/ clearances.	In effect	People	Access to skilled personnel will enhance the likelihood of success of an OWR.	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; none identified	Cost of membership with OSRL	**In effect**
	Maintain labour hire arrangements for access to untrained personnel. Untrained personnel accessed through labour-hire arrangements would receive an induction, on-the-job training and work under the supervision of an experienced supervisor.	In effect	People	During a large scale OWR the ability to access large numbers of personnel through labour hire arrangements is imperative in terms of capability for conducting an OWR.	Provides functionality, availability, reliability, survivability, compatibility and independence	Cost of labour hire at time of incident	**In effect**
	Additional Santos OWR trained personnel positioned at VI and Perth	Additional	People	Additional personnel trained in OWR and who are located at facilities will enhance the first strike capability of Santos and therefore enhance the likelihood of success of the OWR,	Improved functionality, availability, reliability and independence.	Cost of training staff	**Accept**

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
				particularly for those instances where oil is ashore within 48 hours			
	Pre-hire and/or prepositioning of staging areas and responders	Additional	System	This may enhance response times and first strike capability and hence improve the likelihood of success of the OWR. Conversely, prepositioned personnel and staging areas may result in negative impacts to the environment and wildlife.	Improved functionality, availability, reliability and independence.	Additional wildlife resources could total $1500 per operational site per day. This is a guaranteed cost regardless of whether a spill occurs or not.	**Reject** The cost of setting up staging areas and having responders on standby is considered disproportionate to the environmental benefit gained. Further, prepositioned personnel and staging sites may have negative impacts on the environment and wildlife. The overall OWR capability Santos can access through Santos staff, AMOSC, AMOSC mutual aid, Santos labour force hire arrangements, DBCA and wildlife carer network are considered adequate, with further advice and international resources available through OSRL.
	Direct contracts with service providers	Alternative	System	This option duplicates the capability accessed through AMOSC and OSRL and would complete for the same resources without providing a significant environmental benefit	Does not improve effectiveness	Cost of contract	**Reject** This option is not adopted as the existing capability meets the need.
Waste Management - Adopted controls and standards are found in Section 17							
Waste Management	Waste management sourced through contract with waste service provider. Contract with waste service provider to be maintained and periodically reviewed. Waste service provider waste receptacles mobilised to Exmouth from Karratha within 12 hrs for containment and recovery, protection and deflection and shoreline clean-up response strategies.	In effect	System	Timely and efficient handling of waste will reduce environmental impacts of waste and waste management. Consideration given to risks of secondary contamination.	Provides functionality, availability, reliability, survivability, compatibility and independence. Area of improvement; none identified	Cost of contract	**In effect**
	Maintain contracts with multiple service providers	Additional	System	Contract with additional waste service provider will not provide an additional environmental benefit as there are two major service providers in the region and reciprocal arrangements facilitate access to equipment of both.	Provides functionality, availability, reliability, survivability, compatibility and independence.	Significant additional cost in maintaining two contracts for the same service	**Reject** No environmental benefit
	Temporary waste storage capacity available through waste service provider, AMOSC, AMSA, OSRL stockpiles	In effect	Equipment	Timely and efficient handling of waste will reduce environmental impacts of waste and waste management. Consideration given to risks of secondary contamination.	Provides functionality, availability, reliability, survivability, compatibility and independence. Area of improvement; none identified	Costs of contracts, MOU with waste service provider, AMOSC, AMSA and OSRL	**In effect**
	Procure temporary waste storage for Santos stockpile	Additional	Equipment	Additional storage available if required. Tanks may be stored in geographic locations that may reduce mobilisation times and allow faster collection and storage of waste. Additional storage may	Provides functionality, availability, reliability, survivability, compatibility and independence	Additional cost in purchase and maintenance of tanks	**Reject** Purchasing this equipment for Santos stockpile is surplus to Santos requirements as AMOSC, AMSA, OSRL provides this equipment in strategic locations. Reduced mobilisation time is not an advantage, as

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
				facilitate continuous collection operations to occur.			waste storage can be mobilised at the same time as collection response strategies, and no waste needs to be stored prior to collection commenced.
	Vessels for waste transport through Santos contracted providers. To minimise vessel decontamination requirements, larger vessel will remain on station whilst smaller vessel will transport waste to Dampier.	In effect	Equipment	Timely and efficient handling of waste will reduce environmental impacts of waste and waste management. Consideration given to risks of secondary contamination.	Provides functionality, availability, reliability, survivability and compatibility. Area of improvement; dependence and availability of vessels	Contract with vessel contractors to be maintained and periodically reviewed	**In effect**
	Contract additional vessels on standby for waste transport	Additional	Equipment	Reduce delays in transportation of waste, particularly greater capacity for containment and recovery in the initial 2-5 days of response	Provides functionality, availability, reliability, survivability, compatibility and dependence	Cost in contracting vessels to remain on standby for incident waste requirements	**Reject** Expense of maintaining vessels on standby that are surplus to day-to-day requirements is disproportionate to environmental benefit. Santos is accustomed to coordinating logistics for tasks around finite resources. Santos monitors vessel availability through Santos Vessel Tracking System. Regularly contracted vessels could be supplemented with vessels of opportunity
	Vessel to vessel waste transfer plan gives details of waste storage requirements and procedures	In effect	Procedure	Allows effective use of available vessels and minimises vessel decontamination requirements	Provides functionality, availability, reliability, survivability, compatibility and independence.	Cost of documentation development, implementation, maintenance and exercising	**In effect**
	Decanting oily water, by returning into boomed area, to be undertaken subject to necessary approvals from AMSA or DoT	In effect	System, Procedure	Allows more effective handling, transportation and disposal of concentrated wastes	Provides functionality, availability, reliability, survivability, compatibility and independence.	Effort to obtain and adhere to approvals	**In effect**
Scientific Monitoring - Adopted controls and standards are found in Section 18.8							
Scientific Monitoring - monitoring service provider and equipment	Maintenance of Monitoring Service Provider contract for scientific monitoring services and annual review of standby manual. SMP provider and monitoring equipment mobilised to site within 72 hrs.	In effect	System	This is the main tool for determining the extent, severity and persistence of environmental impacts from an oil spill and allows operators to determine whether their environmental protection outcomes have been met (via scientific monitoring activities). It is used to inform areas requiring rehabilitation. This strategy also evaluates the recovery from the spill.	Provides functionality, availability, reliability, survivability, compatibility and independence Area of improvement; none identified	Cost of contract with Scientific Monitoring Service Provider	**In effect**
	Regular capability reports from Monitoring Service Provider shows personnel availability and annual reviews of standby manual	In effect	System	This ensures the Monitoring Service Provider has the capability to undertake Scientific Monitoring, including, post-spill preimpact surveys within the EMBA of receptors with deficient baseline data	Improves functionality, availability and reliability	Cost of contract with Scientific Monitoring Service Provider	**In effect**
	Conduct periodical review of existing baseline data sources across the Santos combined EMBA	In effect	System	This ensures that receptors within the EMBA with deficient baseline data are identified	Improves functionality and provides compatibility	Cost of contract with Scientific Monitoring Service Provider	**In effect**

Strategy	Control Measure	Alternative, Additional, Improved	Control Measure Category	Environmental Outcomes	Effectiveness	Feasibility	Accept/ Reject
Scientific Monitoring - vessels	Scientific monitoring personnel, plant and equipment on standby at the operational location	Additional	People, equipment	Improve mobilisation time	Improved availability and reliability	Cost would be in excess of $1 mil annually	**Reject** **Cost of control measure is disproportionate to the environmental benefit**
	Maintain equipment list and list of suppliers for implementation of Scientific Monitoring Plans	Improved	Procedure	Improve response time	Improved functionality, availability and reliability	Cost of contract with Scientific Monitoring Service Provider	**Accept**
	Oil sampling kits for scientific monitoring personnel to positioned at Varanus Is., Exmouth and Dampier	Improved	Equipment	Improve response time	Improved availability and reliability	Cost associated with purchase of equipment and maintenance	**Accept**
	Level 2: vessels sourced through Master Service Agreement, located in region and tracked by Santos Vessel Monitoring System. Santos to mobilise monitoring vessels to deployment location within 72 hrs.	In effect	Equipment	Improve response time	Provides availability and reliability	Effort associated with maintaining MSA	**In effect**
	Level 3: vessels sourced without existing contracts from any location	In effect	Equipment	Reduce the volume of surface hydrocarbons to reduce contact with protection priorities.	Provides survivability, compatibility and independence. Area of improvement; functionality, availability and reliability of tow vessels.	Cost of contracts at the time of requirement.	**In effect**
	Determine required vessel specifications required for Scientific Monitoring implementation and improve accuracy of Vessel Tracking System	Improved	Procedure	Improve mobilisation time	Increase in availability and reliability	Effort to determine vessel specifications and improve tracking	**Accept**

Appendix C: Pollution Report

Department of **Transport**

When blank, this form is classed as **OFFICIAL**, when filled out, this form is classed as **OFFICIAL-SENSITIVE.**

Marine Pollution Report (POLREP)

BEFORE completing this form please contact the MEER duty officer on (08) 9480 9924 (24hrs). Immediate reporting will enable a rapid response.

Return completed form to:
Maritime Environmental Emergency Response
Department of Transport
Email: marine.pollution@transport.wa.gov.au and rccaus@amsa.gov.au
Phone (08) 9480 9924
Fax: 1300 905 866

INCIDENT DETAILS

Date of Incident: ________________ Time of Incident *(24 hr format)*: ______________

Location name/description: ____

____

Incident Coordinates Latitude of spill ____________________ Longitude of spill ____________________

Format of coordinates used *(select one)* ☐ *Degrees & decimal degrees* ☐ *Degrees, minutes & decimal minutes* ☐ *Degrees, minutes & seconds*

Description of Incident: ____

____

____

____

____

POLLUTION SOURCE

☐ Vessel ☐ Land *(Specify)* ____________ ☐ Other *(Specify)* ____________ ☐ Unknown

Vessel type *(if known)* ☐ Tanker ☐ Container ☐ Bulk ☐ Cargo

☐ Fishing ☐ Defence ☐ Recreational ☐ Other *(Specify)* ____________

Vessel name: ____________ Flag State / Callsign: ____________ Australian vessel? ☐ Yes ☐ No

POLLUTANT

☐ **Oil** *(type)* ☐ Bilge ☐ Diesel ☐ HFO bunker ☐ Crude ☐ Unknown ☐ Other *(Specify)* ____________

☐ **Chemical** Name: ____________ MARPOL cat / UN Nos: ____________

☐ **Garbage** Details/description: ____________

☐ **Packaged** Details/description: ____________

☐ **Sewage** Details/description: ____________

☐ **Other** Details/description: ____________

EXTENT

Size of spill ***(length & width in metres):*** ____________

Amount of pollutant, if known ***(litres):*** ____________

Has the discharge stopped? ☐ Yes ☐ No ☐ Unknown

Weather conditions at site: ____________

____

____

☐ **Photos taken** Details: ____________ held by: ____________

☐ **Video taken** Details: ____________ held by: ____________

☐ **Samples taken** Description: ____________ held by: ____________

☐ **Items retrieved** Description: ____________ held by: ____________

ADDITIONAL INFORMATION

Response action undertaken? ☐ Yes ☐ No If yes, provide details below, please include any environmental impact.

Equipment used? ☐ AMSA ☐ State / NT ☐ Industry

Is assistance for an investigation required from DoT ○ Yes ○ No

ORIGINAL REPORT SOURCE

Name:__________ Position:__________ Phone: __________

Combat agency:__________ Statutory agency: __________

SENDER DETAILS

Name:__________ Agency:__________ Date:__________

Phone: __________ Fax: __________ Email:__________

PRIVACY STATEMENT

The Department of Transport is collecting the information on this form to enable it to carry out its role as Jurisdictional Authority as per WestPlan - Marine Oil Pollution. The Department of Transport and/or AMSA may give some or all of this information to other government bodies, non-government organisations who have responsibilities under the National Plan, and law enforcement agencies.

Once you have completed the form please check that all relevant fields have been filled with accurate data.
Please email completed form to marine.pollution@transport.wa.gov.au

Appendix D: Situation Report

Department of
Transport

When blank, this form is classed as **OFFICIAL**, when filled out, this form is classed as **OFFICIAL-SENSITIVE.**

Marine Pollution Situation Report (SITREP)

Send completed form to:
Maritime Environmental Emergency Response
Department of Transport
GPO Box C102 PERTH, WA 6839
Email: marine.pollution@transport.wa.gov.au
and rccaus@amsa.gov.au
Fax: 1300 905 866

MARINE POLLUTION SITUATION REPORT (SITREP)

This is advice from the Control Agency of the current status of the incident and the response.

This form is transmitted to all relevant agencies including:

- Jurisdictional Authority
- Support Agencies

Incident Name:_______________ **Ref. No.** _______________

Priority ☐ Urgent ☐ Immediate ☐ Standard

Final SITREP? ☐ Yes ☐ No Next SITREP on: _______________

Date:_______________ **Time:**_______________

POLREP Reference: _______________

Incident location Latitude_______________ Longitude_______________

Brief description of incident and impact:

Overall weather conditions:

Summary of response actions to date:

Current Strategies:

Summary of resources available/deployed:

Expected developments:

Other Information:

SITREP Prepared By	Name:	
	Agency:	
	Role:	
	Contact	Telephone
		Fax
		Mobile
	No of Pages Attached:	

To post the form please click on the "POST" button below

POST

RESET

MEP_Sitrep_1114

Appendix E: Vessel Surveillance Observer Log

Santos

Vessel Surveillance Observer Log – Oil Spill

Survey Details			
Date	Start time:	End Time:	Observers:
Incident:			Area of Survey:
Vessel:			Master:

Weather Conditions	
Wind speed (knots):	Wind direction:
Time high water and height (LAT):	Current direction:
Time low water and height (LAT):	Current speed (nM):
Tide during observations:	Sea state:
Stage of tide during observations (incoming/falling):	Other weather observations:

Slick Details											
Slick grid parameters by lat/long:					Slick grid parameters (vessel speed)			Slick grid dimensions: N/A			
Length Axis:		Width Axis:			Length Axis: N/A			Width Axis	Length	nm	
Start Latitude		Start Latitude			Time (seconds)			Time (seconds)	Width	nm	
Start Longitude		Start Longitude							Length	nm	
End Latitude		End Latitude			Speed (knots)			Speed (knots)	Width	nm	
End Longitude		End Longitude							Grid area	km^2	
Code	Colour	%age cover observed	Total grid area		Area per oil code			Factor	Oil volume		
1	Silver			km^2		km^2		40-300 L/ km^2		L	
2	Iridescent (rainbow)			km^2		km^2		300-5,000 L/ km^2		L	
3	Discontinuous true oil colour (Brown to black)			km^2		km^2		5,000-50,000L/ km^2		L	
4	Continuous true oil colour (Brown to black)			km^2		km^2		50,000 – 200,000 L/ km^2		L	
5	Brown / orange			km^2		km^2		>200,000 L/ km^2		L	

Timeline of observations:

Time	Description

Appendix F: Aerial Surveillance Observer Log

Santos

Aerial Surveillance Observer Log – Oil Spill

Survey Details			
Date:	Start time:	End Time:	Observer/s:
Incident:		Area of Survey:	
Aircraft type:	Call sign:	Average Altitude:	Remote sensing used:

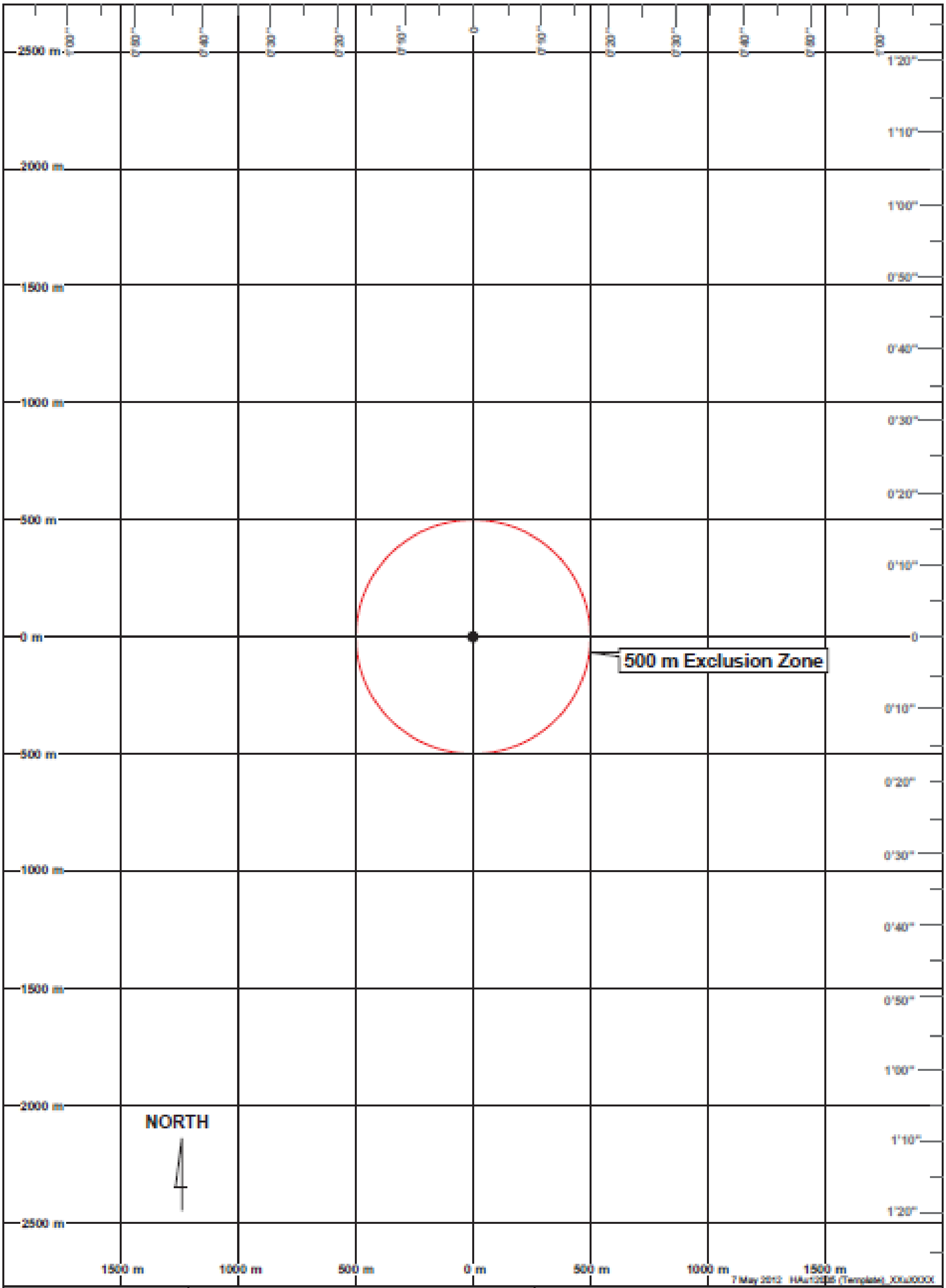
Weather Conditions	
Wind speed (knots)	Wind direction
Cloud base (feet)	Visibility
Time high water	Current direction
Time low water	Current speed (nM)

Slick Details						
Slick grid parameters (lat/long)		Slick grid parameters (air speed)		Slick grid dimensions		
Length Axis	Width Axis	Length Axis		Width Axis	Length	nm
Start Latitude	Start Latitude	Time (seconds)		Time (seconds)	Width	nm
Start Longitude	Start Longitude				Length	nm
End Latitude	End Latitude	Air Speed (knots)		Air Speed (knots)	Width	nm
End Longitude	End Longitude				Grid area	km^2

Code	**Colour**	**% cover observed**	**Total grid area**		**Area per oil code**		**Factor**	**Oil volume**	
1	Silver			km^2		km^2	40-300 L/ km^2		L
2	Iridescent (rainbow)			km^2		km^2	300-5,000 L/ km^2		L
3	Discontinuous true oil colour (Brown to black)			km^2		km^2	5,000-50,000L/ km^2		L
4	Continuous true oil colour (Brown to black)			km^2		km^2	50,000 – 200,000 L/ km^2		L
5	Brown / orange			km^2		km^2	>200,000 L/ km^2		L

Appendix G: Aerial Surveillance Surface Slick Monitoring Template

AERIAL SURVEILLANCE SURFACE SLICK MONITORING TEMPLATE



	NAME:	VESSEL / AIRCRAFT:
	DATE / HOUR:	OTHER REFERENCE:

Appendix H: Aerial Surveillance Marine Fauna Sighting Record

Santos

OIL SPILL SURVIELLANCE - MARINE FAUNA SIGHTING RECORD SHEET

Date:		**Time:**	
Latitude:		**Longitude:**	

MARINE FAUNA ID GUIDE

☐ Humpback whale

☐ Blue whale

☐ Minke whale

☐ Sperm whale

☐ Killer whale

☐ Bryde's whale

☐ Whale species unknown

☐ Bottlenose dolphin

☐ Spinner dolphin

☐ Dolphin species unknown

☐ Whale shark

☐ Dugong

☐ Hawksbill turtle

☐ Loggerhead turtle

☐ Green turtle

☐ Flatback turtle

☐ Leatherback turtle

☐ Turtle species unknown

FAUNA DETAILS					
Category	**Type/species?** **Adult/juvenile?** **ID confidence?**	**Number**	**Date/Time**	**Photo/ video taken?** **Reference No.**	**Behaviour / Comments.** **Proximity to oil? Oiled?** **Milling? Feeding? Transiting?**
Cetaceans (Whales/ Dolphins)					
Turtles					
Birds					
Dugongs					
Sharks					
Other					

Santos

Other details for each observation location
WEATHER DETAILS
Sea State ◯ Mirror calm ◯ Small waves ◯ Slight ripples ◯ Large waves some whitecaps ◯ Large waves, many whitecaps **Visibility** ◯ Excellent ◯ Good ◯ Moderate ◯ Poor ◯ Very Poor
OBSERVER DETAILS

Observer Name	Observer signature	**Observer** ◯ Inexperienced ◯ Experienced

Appendix I: Aerial Surveillance Shoreline Observation Log

Santos

Aerial Surveillance Reconnaissance Log – Oil Spill

Survey Details				
Incident:	Date:	Start time:	End Time:	Observer/s:

Area of Survey	
Start GPS LATITUDE: LONGITUDE:	End GPS LATITUDE: LONGITUDE:

Aircraft type	Call sign	Average Altitude	Remote sensing used (if any)

Weather Conditions		
Sun/Cloud/Rain/Windy	Visibility	Tide Height L/M/H
Time high water	Time low water	Other

Shoreline Type - Select only ONE primary (P) and ANY secondary (S) types present					
	Rocky Cliffs		Boulder and cobble beaches		Sheltered tidal flats
	Exposed artificial structures		Riprap		Mixed sand and gravel beaches
	Inter-tidal platforms		Exposed tidal flats		Fine-Medium sand grained beaches
	Mangroves		Sheltered rocky shores		Other
	Wetlands		Sheltered artificial structures		

Operational Features (tick appropriate box)					
	Direct backshore access		Alongshore access		Suitable backshore staging
Other					

Appendix J: IMT Resourcing

IMT Resourcing

Santos manages its IMT capability through a range of arrangements including internal Santos personnel and external support. Santos internal capability includes competent personnel available for incident management from various Santos business units in Australia. Santos also has access to IMT support personnel through a range of external arrangements consisting of:

- AMOSC Member Agreement
- Industry Mutual Aid /Core Group Personnel
- OSRL Member Agreement
- Specialist Service providers including;
  - WWC: for Source Control support
  - RPS: For oil spill modelling/visualization support
  - BMT/Astron: Monitoring Service provider
  - NWA: Waste Management Contractor
  - TOLL: Logistics Services Contractor
  - Aspen: Medical Services Provider
  - Recruitment Servicer provider/ Labour Hire Companies

Santos's Master Services Contract with AMOSC gives access to 80 to 120 oil spill trained personnel through industry Core Group. The Expanded IMT Resourcing Plan below (**Table J-1**) assumes about 25% of this capability available for IMT support and the remaining 50 to 90 personnel available for field response team roles. Santos has guaranteed access to 18 Response Specialists from OSRL for any incident under the Associate Membership Agreement. OSRL has about 150 oil spill technical personnel available across their global bases. Santos may request for additional resources from OSRL for major oil spill events and the resources will be available on a best endeavor basis. The Expanded IMT Resourcing Plan below (**Table J-1**) assumes about 30% of this capability available for IMT support. Santos also has in place arrangements with specialist service providers for roles which apply non-oil-spill expertise in a response context, such as Logistics, Finance, Waste Management, Source Control etc. The IMT capability for these roles is established through the specialist service providers as listed above.

Santos will work closely with relevant government authorities (e.g. DoT, DBCA) for incident management aspects related to shoreline response and oiled wildlife response. The capability available under the SRT/NRT (~ 150 IMT personnel / 40 SRT personnel) is not included in the expanded IMT resourcing plan.

The WCD Response timeline is estimated to be 18 to 20 weeks. This is estimated based on the timeline for relief well drilling (11 weeks) and shoreline clean-up activities (with Muiron Islands/ Ningaloo Coast North estimated to have the longest shoreline clean-up time of 16 weeks). Response termination and demobilization will follow a phased approach and additional 2 to 4 weeks is added to account for the final response termination and demobilization phase once the shoreline clean-up activities are completed. Peak resourcing requirements for IMT is anticipated between week 3 to week 11 and thereafter to gradually decline until the response is terminated.

Assuming a protracted response requiring two rotational IMT teams with a day and night shift for each team, the total resourcing requirement for the expanded IMT is estimated to be 142 persons. Santos internal resourcing (Including support from other business units in Australia) provides access to 172 personnel for IMT support and an additional 119 personnel is estimated to be available through external arrangements. The predicted allocation of resources to the expanded IMT roles is shown in **Table J-1**.

Table J-1: Expanded IMT Resourcing Plan

#	IMT POSITION		Required	Available Resources: Santos	Available Resources: Total Allocated personnel available via Contracting Arrangements	Total Personnel Available through internal/external Arrangements
1	INCIDENT COMMANDER		2	14	NA	14
	DEPUTY IC		2			
2	Safety Officer		2	10	NA	10
3	Public Information Officer		2	6	NA	6
4	DoT LO		2	2	NA	2
	Media LO		2	2	NA	2
5	HR		3	10	NA	10
6	PLANNING SECTION CHIEF		2	8	NA	8
	Deputy Planning Section Chief		2			
	Situation Unit Lead		2	7	2	9
		COP Display Processor/GIS Specialist	2	2		2
	Resources Unit Lead		2	4	2	6
	Documentation Unit Lead		2	3	NA	3
	Environment Unit Lead		2	5	NA	5
	Technical Specialists	Modelling Specialist	2		5	5
		Sampling/Monitoring Specialist	2		3	3
		Waste Management Specialist	2		2	2
		Wildlife Specialist	2	4	4	8
		Response Specialists (as required for branches)	10		10	10
	Shoreline Response Programme Manager		2		4	4
		STR Manager	2	4	6	10
		SCAT Programme Coordinator	2	2	6	8
		SCAT Data Manager	2	2	2	4
		SCAT Field Coordinator	2	2	5	7
7	OPERATION SECTION CHIEF		3	13	NA	13
	Deputy Operations Section Chief		3			
	Source Control Branch Director		2	4		4
		Relief Well Group Lead	2	2		2
		Subsea Intervention Group Lead (*see Note 1*)	2	2		2
	Staging Branch Director		2	2		2
	Monitoring Branch Director		2		3	3
	Wildlife Response Branch Director		2		2	2
	Air Operations Branch Director		2	4	1	5
	Offshore Response Branch Director		2	2	3	5
		Dispersant Operations Group Lead	2		5	5
		Recovery & Protection Group Lead	2		5	5
	Shoreline Clean-Up Branch Director		2		5	5
		Geographical Division Supervisors	18	15	6	21
8	LOGISTICS SECTION CHIEF		3	12	NA	12
	Logistics Specialists (as required for branches)		7		8	8
	Support Branch Director		3	7		7
		Supply Unit Lead Lead	2		2	2
		Facilities Unit Lead	2		2	2
		Ground Support Unit Lead	2		2	2
		Vessel Support Unit Lead	2	1	2	3
	Service Branch Director		3	8		8
		Communications Unit Lead	2		2	2
		Medical Unit Lead	2		6	6
		Food Unit Lead	2		2	2
9	FINANCE SECTION CHIEF		3	13	NA	13
		Procurement Unit Lead	2		4	4
		Claims Unit Lead	2		4	4
		Cost Unit Lead	2		4	4
	NA = Not Applicable					
		Sub-total	***142***	***172***	***119***	**291**

Note 1: Due to the rig type and BOP location, the Blowout Preventer and Capping Stack Groups is not expected to be activated.

Department of Transport Office		Required	Available Resources		Total Personnel Available through internal/external Arrangements
			Santos	Total Allocated personnel available via Contracting Arrangements	
1	CMT Liaison Officer	1	5		5
2	Deputy Incident Controller	1	2		2
3	Deputy PIO	1	2		2
4	Deputy Planning Officer	1		1	1
5	Deputy Intelligence Officer	1		1	1
6	Environmental Support Officer	1	2		2
7	Deputy Logistics Officer	1	2		2
8	Deputy Operations Officer	1	2		2
9	Deputy Finance Officer	1	2		2
10	Deputy Division Commander (FOB)	1		1	1
11	Deputy Waste Management Coordinator	1		1	1
		11	*17*	*4*	21

Appendix K: Testing Arrangements Plan

Testing Arrangements Plan

#	Response Arrangements & Critical Components	Type of Test	Schedule	Objectives	KPIs
1	**Source Control Options**				
	Relief Well Drilling - Access to MODU	MODU Register review	Once per month for the duration of drilling campaign	Identify suitable MODU that can be utilized in the event of a Source control incident requiring a relief well	Document the identified suitable MODU by: • Name • MODU Type • Location • Contract Status
	Access to Source Control Emergency Response Personnel	Desktop Exercise	Annually (when drilling activity is occurring)	To check arrangements for access to Well Control Specialists from WWC as per Source Control Planning and Response Guideline DR-00-OZ-20001	Confirmation (email) from WWC that listed Well Control specialists can be made available and will be mobilized within 72 hours of a notification
	Testing of Santos Source Control Planning and Response Guideline DR-00-OZ-20001	Desktop Exercise	Annually	Testing of key arrangements in the Santos Source Control Planning and Response Guideline DR-00-OZ-20001	Validate key arrangements in Santos Source Control Planning and Response Guideline DR-00-OZ-20001
	Vessel Fuel Tank Rupture - SOPEP	Contract/Plan Review	Prior to vessel arrival in field	To confirm that each vessel within the field has an approved SOPEP in place	Review to confirm approved SOPEP in place for vessels
2	**Monitor & Evaluate Options**				
	Vessel Surveillance a) Access to vessels	Contract/Plan Review	Annually	To confirm access to vessels for surveillance	Review to confirm Master Service Agreements (MSAs) with vessel providers to gain access to vessels
	Aerial Surveillance a) Access to aircraft	Contract/Plan Review	Annually	To confirm access to aircrafts for surveillance	Review to confirm Master Service Agreements (MSAs) with aircraft providers to gain access to aircrafts for surveillance
	Aerial Surveillance	Contract/Plan Review	Annually	To confirm access to trained aerial observers	Review to confirm access to trained aerial observers through;

#	Response Arrangements & Critical Components	Type of Test	Schedule	Objectives	KPIs
	b) Access to trained aerial observers				• Trained Santos personnel or • AMOSC Member Contract or • OSRL Associate Member Contract
	Unmanned Aerial Vehicles (UAV) a) Access to UAV providers	Contract/Plan Review	Annually	To confirm access to UAV providers	Review to confirm access to UAV providers through; • AMOSC Member Contract or • OSRL Associate Member Contract
	Fauna observations – Maintain a list of air charter companies that could provide fauna observation services	Review List	Annually	To confirm that a list of air charter companies that could provide fauna observation services is maintained	Review to confirm that a list of air charter companies that could provide fauna observation services is maintained
	Tracking Buoys a) Access to Tracking Buoys	Contract/Plan Review	Prior to activity commencement	To confirm access to tracking buoys	Review to confirm access to 12 Tracking Buoys
	Tracking Buoys b) Response readiness	Communication/Tracking software Test	6-monthly	To confirm response readiness for Tracking buoys	Tracking Buoys pass functional test as per operational instructions
	Oil Spill Modelling a) Access to oil spill modelling service provider	Contract/Plan Review	Prior to activity commencement	To confirm access to emergency response oil spill modelling services	Review to confirm access to emergency oil spill modelling services through maintenance of service provision contract
	Satellite Imagery a) Access to Satellite Imagery service provider	Contract/Plan Review	Prior to activity commencement	To confirm access to satellite imagery services	Review to confirm access to satellite imagery services through; • AMOSC Member Contract or • OSRL Associate Member Contract

#	Response Arrangements & Critical Components	Type of Test	Schedule	Objectives	KPIs
	Operational Water Quality Monitoring a) Access to monitoring service provider	Contract/Plan Review	Prior to activity commencement	To confirm access to operational water quality monitoring services	Review to confirm access to operational water quality monitoring services through maintenance of service provision contract
	Operational Water Quality Monitoring b) Access to fluorometry equipment	Contract/Plan Review	Prior to activity commencement	To confirm access to fluorometry equipment for water quality monitoring	Review to confirm access to fluorometry equipment through; • Maintenance of service provision contract with monitoring service provider • OSRL Associate Member contract
	Operational Water Quality Monitoring d) Access to Dispersant Efficacy Field Test Kit	Equipment Check	Annually	To confirm access to Dispersant Efficacy Field Test Kit	Review to confirm access to Dispersant Efficacy Field Test Kit
	Operational Water Quality Monitoring e) Access to Oil Sampling Kit	Equipment Check	Annually	To confirm access to Oil Sampling Kit	Review to confirm access to Oil Sampling Kit
	Shoreline Clean-up Assessment a) Access to trained Shoreline Clean-up and Assessment Technique (SCAT) personnel	Contract/Plan Review	Prior to activity commencement	To confirm access to trained SCAT personnel	Review to confirm access to trained SCAT personnel through; • AMOSC Member Contract • OSRL Associate Member Contract • TRG arrangements
		Desktop Exercise	Annually	To confirm access to a range of Monitor & Evaluate options to ensure situational awareness for IMT	• Access to vessel and aerial platforms for surveillance confirmed. • Availability of trained aerial observers from day 2 confirmed through internal or external resources

#	Response Arrangements & Critical Components	Type of Test	Schedule	Objectives	KPIs
					• Spill modelling delivered to IMT within 2 hrs of request to service provider • Availability of Tracking Buoy for deployment confirmed by onsite team • Satellite imagery acquisition and timelines confirmed by the service provider upon notification • Access to water quality monitoring services confirmed by service provider upon notification • Availability of Dispersant Efficacy Field Test Kit confirmed by on-site team • Access to SCAT trained personnel confirmed through AMOSC or OSRL contract
3	**Containment & Recovery**				
	a) Access to offshore containment Booms	Contract/Plan Review	Annually	To confirm access to offshore containment booms	Review to confirm access to offshore containment booms through the following; • AMOSC Member Contract • OSRL Associate Member Contract
	b) Access to offshore recovery devices	Contract/Plan Review	Annually	To confirm access to offshore recovery devices	Review to confirm access to offshore recovery devices through the following; • AMOSC Member Contract • OSRL Associate Member Contract
	c) Access to vessels	Contract/Plan Review	Annually	To confirm access to vessels for containment and recovery operations	Review to confirm Master Service Agreements (MSAs) with vessel providers to gain access to vessels for containment and recovery operations
	d) Access to trained responders	Contract/Plan Review	Annually	To confirm access to trained responders	Review to confirm access to trained responders through the following; • AMOSC Member Contract • OSRL Associate Member Contract

#	Response Arrangements & Critical Components	Type of Test	Schedule	Objectives	KPIs
					• MoU for access to National Plan resources through AMSA
		Desktop Exercise	Annually	• To test activation procedure to access containment and recovery equipment and trained responders from external arrangements and service providers • To confirm access to containment recovery equipment and trained responders from external arrangements and service providers	Emails confirming access to containment and recovery equipment and trained responders through external arrangements and service providers
4	**Mechanical Dispersion**				
	a) Access to vessels	Contract/Plan Review	Annually	To confirm access to vessels for mechanical dispersion	Review to confirm Master Service Agreements (MSAs) with vessel providers to gain access to vessels
5	**Dispersant Application**				
	a) Access to Dispersants	Contract/Plan Review	Annually	To confirm access to dispersants	Review to confirm access to dispersants through the following; • AMOSC Member Contract • OSRL Associate Member Contract • OSRL Global Dispersant Stockpile Supplementary Agreement • AMSA National Plan
	b) Access to Dispersant Vessel Spray System	Contract/Plan Review	Annually	To confirm access to Dispersant vessel spray systems	Review to confirm access to vessel spray systems through; • Santos' equipment • AMOSC Member Contract • OSRL Associate Member Contract

#	Response Arrangements & Critical Components	Type of Test	Schedule	Objectives	KPIs
	c) Access to Aerial Dispersant Application System	Contract/Plan Review	Annually	To confirm access to Aerial Dispersant Application System	Review to confirm access to Aerial Dispersant Application systems through; • AMOSC FWAD Contract • OSRL Associate Member Contract
	d) Access to subsea dispersant injection equipment	Contract/Plan Review	Annually	To confirm access to Subsea Dispersant Injection equipment	Review to confirm access to subsea Dispersant Injection equipment through AMOSC SFRT participant contract
	e) Santos' Vessel Dispersant Spray System – Response Readiness	Deployment Exercise	Annually	To confirm response readiness for vessel dispersant spray system	Vessel Dispersant Spray system successfully deployed as per operational instructions
	f) Logistics arrangement for GDS dispersant stockpile mobilization for a Level 3 oil spill incident	Desktop Exercise	Annually	To confirm GDS dispersant stockpiles can be mobilized in the event of a Level 3 incident	Confirm mobilization time frames as per Dispersant Logistics Plan
		Desktop Exercise	Annually	• To test activation procedure to access dispersants and application systems from external arrangements and service providers • To confirm access to dispersants and application systems from external arrangements and service providers	Emails confirming access to dispersants and application systems from service providers/external arrangements
6	**Shoreline Deflection & Protection**				
	a) Access to shoreline deflection & protection equipment	Contract/Plan Review	Annually	To confirm access to shoreline deflection and protection equipment	Review to confirm access to shoreline deflection and protection equipment through the following; • Santos' equipment • AMOSC Member Contract • OSRL Associate Member Contract

#	Response Arrangements & Critical Components	Type of Test	Schedule	Objectives	KPIs
					• MoU for access to National Plan resources through AMSA
	b) Access to trained responders	Contract/Plan Review	Annually	To confirm access to trained responders	Review to confirm access to trained responders through the following; • AMOSC Member Contract • OSRL Associate Member Contract • TRG arrangements • MoU for access to National Plan resources through AMSA
	c) Access to shallow draft vessels	Review of list of shallow draft vessel providers	Annually	To confirm access to shallow draft vessels to support shoreline deflection & protection	Review to confirm access to shallow draft vessel providers
	d) Santos' shoreline deflection and protection equipment	Deployment Exercise	Annually	To confirm response readiness for Santos' shoreline deflection and protection equipment	Shoreline deflection and protection booms and recovery devices (disc/brush skimmers) deployed successfully as per operational instructions
		Desktop Exercise	Annually	• IMT to confirm shoreline protection priorities and develop IAP shoreline deflection and protection sub-plan • To test activation procedure to access shoreline deflection and protection equipment and trained responders from external arrangements and service providers • To confirm access to shoreline deflection and protection equipment and personnel from external arrangements and service providers	• Shoreline protection priorities established by IMT • IAP shoreline deflection and protection sub-plan developed by IMT • Emails confirming access to shoreline deflection and protection equipment and trained responders through external arrangements and service providers

#	Response Arrangements & Critical Components	Type of Test	Schedule	Objectives	KPIs
7	**Shoreline Clean-up**				
	a) Access to shoreline clean-up equipment	Contract/Plan Review	Annually	To confirm access to shoreline clean-up equipment	Review to confirm access to shoreline clean-up equipment through the following; • AMOSC Member Contract • OSRL Associate Member Contract • MoU for access to National Plan resources through AMSA
	b) Access to trained responders	Contract/Plan Review	Annually	To confirm access to trained responders	Review to confirm access to trained responders through the following; • AMOSC Member Contract • OSRL Associate Member Contract • TRG arrangements • MoU for access to National Plan resources through AMSA
	c) Access to labour hire	Contract/Plan Review	Annually	To confirm access to labour hire	Review to confirm access to labour hire through maintenance of contract with labour hire provider
		Desktop Exercise	Annually, subject to DoT availability	• To test coordination with DoT to implement shoreline clean-up plan as detailed in Section 15 of the OPEP • To test activation procedure to access shoreline clean-up equipment and personnel from external arrangements and service providers • To confirm access to shoreline clean-up equipment and personnel	• IMT interfaces established between Santos and DoT to jointly manage shoreline clean-up activities for impacted shorelines as identified in the OPEP Section 15 • Shorelines clean up priorities established, and IAP shoreline clean-up sub-plan developed by IMT in consultation with DoT • Shoreline clean-up resourcing plan established and access to equipment and personnel confirmed through internal and external

#	Response Arrangements & Critical Components	Type of Test	Schedule	Objectives	KPIs
				from external arrangements and service providers	arrangements/service providers to meet these requirements.
		DoT Joint Exercise	Every 2 years; The exercise will be coordinated by DoT and will be dependent on DoT's interest and availability. Santos will express interest for a joint exercise with DoT	• To test collective response arrangements between Santos and DoT for a Level 2/3 oil spill incident impacting State waters	• IMT interface between Santos and DoT IMT established to jointly manage the shoreline clean-up activities as identified for the exercise scenario • Shoreline response plan jointly developed by Santos and DoT • Equipment and personnel required identified and implemented through collective response arrangements between Santos and DoT.
8	**Oiled Wildlife Response**				
	a) Access to OWR equipment	Contract/Plan Review	Annually	To confirm access to OWR equipment	Contract review to confirm access to OWR equipment through the following; • AMOSC Member Contract • OSRL Associate Member Contract • MoU for access to National Plan resources through AMSA
	b) Access to OWR personnel	Contract/Plan Review	Annually	To confirm access to OWR personnel	Contract review to confirm access to OWR personnel through the following; • AMOSC Member Contract • OSRL Associate Member Contract • Santos personnel
		Desktop Exercise	Annually	• To confirm activation procedure for OWR services with external service providers • To confirm access to OWR equipment from external arrangements	• Emails from service providers confirming OWR equipment availability. • Access to OWR personnel confirmed through a combination of internal and external resources

#	Response Arrangements & Critical Components	Type of Test	Schedule	Objectives	KPIs
				• To confirm access to OWR personnel through a combination of internal and external resources	
9	**Waste Management**				
	a) Access to personnel, equipment, and vehicles through Waste Service Provider	Contract/Plan Review	Annually	To confirm access to personnel, equipment, and vehicles for oil spill waste management	Contract review to confirm access to personnel, equipment, and vehicles for oil spill waste management
		Desktop Exercise	Annually	To confirm activation procedure for oil spill waste management services	Confirmation email from service provider on personnel, equipment, and vehicles for oil spill waste management within 24hrs of notification
10	**Scientific Monitoring**				
	a) Access to specialist monitoring equipment	Contract/Plan Review	Annually	To confirm access to specialist monitoring equipment	Contract review to confirm access to specialist monitoring equipment
	b) Access to specialist monitoring personnel	Contract/Plan Review	Annually	To confirm access to specialist monitoring personnel	Contract review to confirm access to specialist monitoring personnel
		Desktop Exercise	Annually	• To confirm activation procedure for scientific monitoring services • To confirm access to personnel and equipment	Confirmation email from service provider (Astron) on monitoring personnel and equipment available
11	**IMT**				
	a) Access to trained IMT personnel	Contract/Plan Review	Annually	To confirm access to trained IMT personnel	Review to confirm access to IMT personnel through the following; • AMOSC Member Contract • OSRL Associate Member Contract • MoU for access to National Plan resources through AMSA

#	Response Arrangements & Critical Components	Type of Test	Schedule	Objectives	KPIs
		Availability Test for IMT	Annually	To confirm appropriate Santos's personnel to fill the IMT roles outlined in this OPEP	Each role listed can be filled by appropriately qualified staff and reporting hierarchy understood
		Level 2/3 IMT exercise	Annually	• To confirm the response capability and capacity for Santos IMT • To confirm external capability and capacity arrangements for IMT	• IAP is completed for the operational period and approved by the Incident Commander • An operational NEBA is undertaken for the operational period of the incident by the IMT • External arrangements tested and successfully integrated with IMT
12	**Others**				

	Communications Testing
	
	a) Communications channels in place and functioning
		Desktop	Required for every approved OPEP.
			
			When response arrangements have changed.
			
			Annually
				To test all communication and notification processes to service providers and regulatory agencies defined within the OPEP	• Notification and communication processes tested successfully for:
					  ○ Service providers
					  ○ Regulatory agencies
					• Communications Test Report completed
					• Corrections updated within the Santos Incident Response Telephone Directory (SO-00-ZF-00025.020)

Appendix L: Shoreline Clean-up Equipment

Equipment List for an Initial deployment of a 6 person Manual Clean Up Team

On Shore Clean-up Tools		Quantity
	Disposal Bag Labelled, 140 cm x50cm x 100um	1000
	Disposal Bag large fit 205ltr drum, 100cm x 150cm x 100um	50
	Polyethylene Safety Shovel 247mm z 978mm	2
	Steel Shovel	4
	Steel Rake	2
	Landscapers Rake	2
	Barrier Tape – "Caution Spill Area"	10
	Pool scoop with extendable handle – flat solid	2
	Poly Mop Handle	2
	Safety Retractable Blade Knife	2
	Poly Rope 20m	6
	Star Pickets	24
	Star Picket driver	1
	Hand Cleaner	1
	Cable ties – general use	1000
	Wheel Barrow	2
	Galvanised Bucket	4
	Pruning secateurs	2
	Hedge Shears	1
Personal Protection Equipment (PPE) Team of 6		
	Spill Crew Hazguard water resistant coveralls (assort sizes)	36
	Respirator dust/mist/fume and valve	40
	Disposable box light nitrile gloves (100bx)	2
	Alpha Tec gloves (assort size)	24
	Ear Plugs (200bx)	1
	Safety Glasses	18
	Safety Goggles non vented	6
	Gum Boots (assort size)	18
	Rigger Gloves (assort size)	18
	Day/Night Vest	6
Storage Equipment		
	Collapsible Bund 1.6m x 1.2m	2
	Collapsible bund 4m x 2.4m	1
	Misc sizes of ground sheets/tarps	6
Absorbents		
	Absorbent Roll 'oil and fuel only' 40m x 9m	6
	Absorbent Pad "oil and fuel only" 45cm x 45cm	400
	Poly Mops (snags)	150
	Poly Absorbent Wipes	10
Additional Items		
	Folding Deck Chair	6
	Folding Table	1
	Shelter open side	1
	6 Person first aid kit	1
	Wide Brim Hat with cord	6
	Sunburn Cream 1 litre pump bottle	1
	Personal Eyewash bottle 500mls	6
	Personal Drink bottle 750mls	6
	Boxes, Bin and Lid Storage/transport assorted	
Optional Items		

	Inflatable Tent 9 square metres	1

Equipment list for a decontamination unit for Beach Clean Up Team

Shore Clean-up Tools		**Quantity**
	Inflatable Decon Tent	1
	Inflatable Tent 9 square metres – Modesty or Control tent	1
	Misc sizes of ground sheets/tarps	4
	Collapsible Bund 1.6m x 1.2m (two stages)	2
	2 stools in each bund	
	Collapsible Bund 4m x 2.4m (for used PPE and clothing into DB's)	1
	Long Handled Scrub brush	2
	Scrub Brush	2
	Simple Green 20 ltr	2
	Poly Absorbent Wipes	10
	Wet Wipe Canister	6
	Disposal Bag for Clothing, 140cm x 50cm x 100um	100
	Bath towel	6
	Liquid soap in push dispenser (citrus based)	1
	Track mat – Absorbent for Corridor/walkway	1
	Star pickets	16
	Star picket driver	1
	Barrier tape to create corridors	4
	Safety Goggles non vented (used during decon)	6
Optional Items		
	Folding Deck Chair	6
	Folding Table	1
	Shelter open side	1
	6 Person first aid kit	1
	Wide Brim Hat with cord	6
	Sunburn Cream 1 litre pump bottle	1
	Personal Eyewash bottle 500mls	6
	Personal Drink bottle 750mls	6
	Boxes, Bin and Lid Storage/transport assorted	

Equipment list for deployment of a 6-person team for flushing or recovery

Flushing Equipment		Quantity
	Diesel self prime semi trash pump, 25-35 psi, 4.8hp	1
	Perforated 2” lay flat hose, 20 mtr sections	2
	Section Hose 2”, 20m sections	5
	Hose End Strainer	1
Recovery Equipment		
	Tidal Boom (shoreline boom) 25m lengths	2 (50m)
	Tidal Boom Accessories pack	1
	Versatech Zoom Curtin Boom 300mm chamber, 450mm skirt 25m section	2 (50m)
	Towing Bridle	2
	Danforth Sand Anchor Kit, 30m lines, 15m trip lines	3
	Diesel Powered pump with hose	1
	Manta Ray skimmer	1
Personal Protection Equipment (PPE) Team of 6		
	Spill Crew Hazguard water resistant coveralls (assort sizes)	36
	Respirator dust/mist/fume and valve	40
	Disposable box light nitrile gloves (100bx)	2
	Ear Plugs (200bx)	1
	Safety Glasses	18
	Gum Boots (assort size)	18
	Hyflex Oil Restraint Gloves (assort size)	18
	Day/Night Vest	6
Storage Equipment		
	Collapsible Bund 1.6m x1.2m	1
	Misc sizes of ground sheets/tarps	6
	Collapsible Tank 5000 litres	2
Absorbents		
	Absorbent Boom ‘oil and fuel only’ 3 or 6m x 180mm	200mtrs
	Absorbent Roll ‘oil and fuel only’ 40m x 9m	10
	Absorbent Pad “oil and fuel only” 45cm x 45cm	1000
	Poly Absorbent Wipes	10
Additional Items		
	Folding Deck Chair	6
	Folding Table	1
	Shelter open side	1
	6 Person first aid kit	1
	Wide Brim Hat with cord	6
	Sunburn Cream 1 litre pump bottle	1
	Personal Eyewash bottle 500mls	6
	Personal Drink bottle 750mls	6
	Boxes, Bin and Lid Storage/transport assorted	
	Inflatable Tent 9 square metres	1

Equipment list for a 6 person team for near shore clean up

Absorbents		
	Absorbent Roll 'oil and fuel only' 40m x 9m	20
	Absorbent Pad "oil and fuel only" 45cm x 45cm	2000
	Absorbent Boom "oil and fuel only" 3or6m z 180mm	200mtrs
	Poly Mops (snags)	150
	Poly Absorbent Wipes	20
Recovery Equipment		
	Tidal Boom (shoreline boom) 25m lengths	4 (100m)
	Tidal Boom Accessories pack	2
	Versatech Zoom Curtin Boom 300mm chamber, 450mm skirt 25m section	8 (200m)
	Towing Bridle	2
	Danforth Sand Anchor Kit 15kg 30m lines, 15m trip lines	10
	Weir Skimmer 30T hr	1
	Trash Screen for above	1
	Diesel Powered pump with hose	1
	Manta Ray skimmer	1
Shore Clean-up Tools		**Quantity**
	Disposal Bag large fit 205ltr drum, 100cm x 150cm x 100um	200
	Pool scoop with extendable handle – flat solid	2
	Poly Mop Handle	2
	Poly Rope 20m	10
	Star Pickets	24
	Star Picket driver	1
	Intrinsic Safe Torch	6
	Hand Cleaner	1
	Cable ties (to add extra join to absorbent booms)	150
Personal Protection Equipment (PPE) Team of 6		
	Spill Crew Hazguard water resistant coveralls (assort sizes)	36
	Disposable box light nitrile gloves (100bx)	2
	Alpha Tec gloves (assort size)	24
	Ear Plugs (200bx)	1
	Safety Glasses – with head strap	18
	Gum Boots (worn extra large or as advised by skipper)	18
	Steel cap waders	2
	Personal Flotation Device	6
	Rigger Gloves (assort size)	18
Storage Equipment		
	Collapsible Bund 1.6m x 1.2m	2
	Collapsible bund 4m x 2.4m	1
	Collapsible Tank 5000 litres	2
	Alum box, Bin & lid Storage/transport cases	10
	Misc sizes of ground sheets/tarps	6
Optional Items		
	6 Person first aid kit	1
	Wide Brim Hat with cord	6
	Sunburn Cream 1 litre pump bottle	1
	Personal Eyewash bottle 500mls	6
	Personal Drink bottle 750mls	6

Appendix M: Shoreline Response Strategy Guidance

Shoreline Response Strategy Guidelines

Guidance on response methods for sensitive coastal habitats is provided in **Table K-1**.

Guidance on applicable shoreline clean-up techniques based on shoreline substrate and degree of oiling are presented in **Figure K-1** to **Figure K-4**.

Table K-1: Strategy Guidance for shoreline response at coastal sensitivities

Sensitive Receptors	Strategy Guidance
Mangroves	- All efforts should be mounted to prevent any oil from moving towards this area by using booms to divert the oil away from this area. - However, if oil is expected to move into this area, multiple rows of booms, or earthen booms can be deployed at the entrance of creeks or along the mangrove fringe to prevent/minimise oiling. - Sorbents can be used to wipe heavy oil coating from roots in areas of firm substrate. Close supervision of clean-up is required. - Where thick oil accumulations are not being naturally removed, low-pressure flushing may be attempted at the outer fringe – sorbent pads and sorbent sweeps can be used to recover the sheen. - No attempt should be made to clean interior mangroves, except where access to the oil is possible from terrestrial areas. - Oily debris should be removed; it is extremely important to prevent disturbance of the substrate by foot traffic; thus most activities should be conducted from boats. - Live vegetation should not be cut or otherwise removed.
Mudflats	- All efforts should be mounted to prevent any oil from moving towards this area by using booms to divert the oil away from this area. - However, if oil is expected to move into this area, multiple rows of booms, or earthen booms can be deployed at the entrance of channels filling/ draining mudflats. - Efforts to manually clean mudflats may result in further damage due to trampling of the oil into sediments which typically rich in biota and provide a food source for fish and birds. - Therefore, natural remediation may be the preferred approach and if removal is required, the flushing of oil into open water, if feasible, may be preferred to manual collection - The presence of wildlife (e.g. shorebirds) and sensitive flora (e.g. mangroves) which are often associated with mudflats needs to be considered in determining the best approach.

Sensitive Receptors	Strategy Guidance
Sandy beaches	- Clean-up techniques will depend upon the degree of infiltration into sand or and degree of burial which will require surveying/mapping - Clean-up will also depend upon sensitivity of environment (existing ecological features), access to the beach and potential for additional erosion. - Oil and oiled sediments can be physically removed offsite, moved to surf zone for surf washing of sediment or assisted to move to water edge by ploughing of channels or flushing. - Recovery of oil can be by manual means (hand tools) or mechanical means (earth moving, pumping equipment). - The sensitivity of the environment is a key factor, with manual removal creating less waste and disturbance but more consuming in time and resources.
Seabirds, shorebirds and migratory waders	- All efforts should focus on deflecting oil away from this area or dispersing the oil offshore or using booms offshore to divert the oil away from this area. - If oil is expected to move into the coastal colonies and roosting areas, multiple booms can be deployed along the reserve to prevent/minimise oiling.
Turtle nesting beaches during or near nesting season	- All efforts should be mounted to prevent any oil from moving towards this area by using booms to divert the oil away from this area. - However, if oil is expected to move into this area, booms can be deployed along the reserve to prevent/minimise oiling.
Fringing coral reef communities (Note: submerged coral reef communities are less susceptible to oiling)	- Little can be done to protect coral reef beds along exposed sections of shoreline. - Floating oil would potentially coat living reef communities, which are usually slightly elevated and are consequently exposed at low tide. - Natural recovery with a close monitoring program is the preferred clean-up technique. Clean-up of the reef itself by natural processes is expected to be rapid. - As much as practicable, oil should be removed from adjacent intertidal areas to prevent chronic exposure of the corals to oil leaching from these sites. - Use of sorbents should be limited to those that can be contained and recovered.
Macroalgal and seagrass beds	- All efforts should focus on deflecting oil away from this area, dispersing the oil offshore, or using booms to divert the oil away from this area. - Extreme care should be taken not to disturb the sediments during clean-up operations in the vicinity of macroalgal and seagrass beds, which could result in total loss of the macroalgal and seagrass beds. - Removal of oiled parts of the macroalgal and seagrass beds should only be considered when it can be demonstrated that special species are at significant risk of injury from contact or grazing on the macroalgal and seagrass beds. - Otherwise, the best strategy for oiled seaweed is to allow natural recovery.
Rocky coast	- Where practicable, booms can be deployed parallel to the rocky coasts to prevent/minimise oiling. - Flushing rocky shoreline is considered the most effective method of cleaning. Care must be taken to assess the fate and transport of the flushed oil and sorbent snares can be used to recover if deemed necessary to reduce impacts to ALARP. - For small areas of contamination, rocky structure can be manually wiped with sorbent pads or scraped to remove oil.

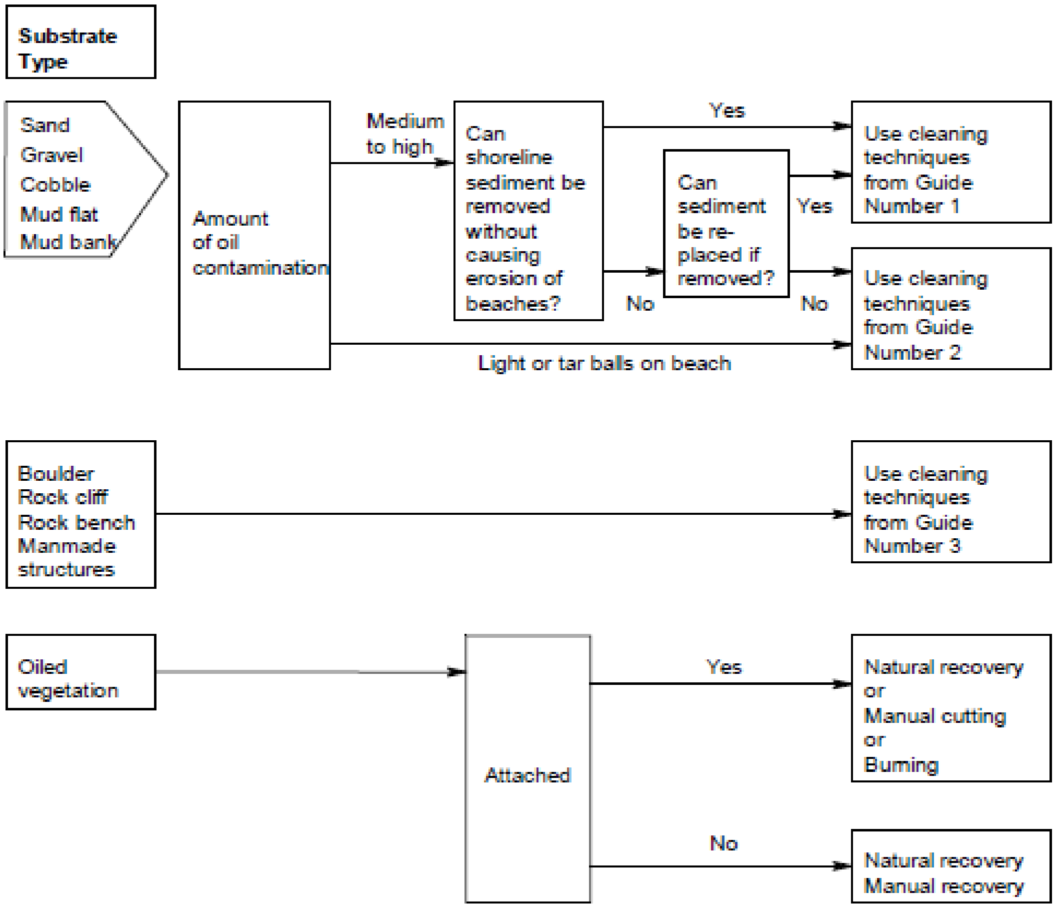


Figure K-1: Shoreline Clean-up Master Decision Guide

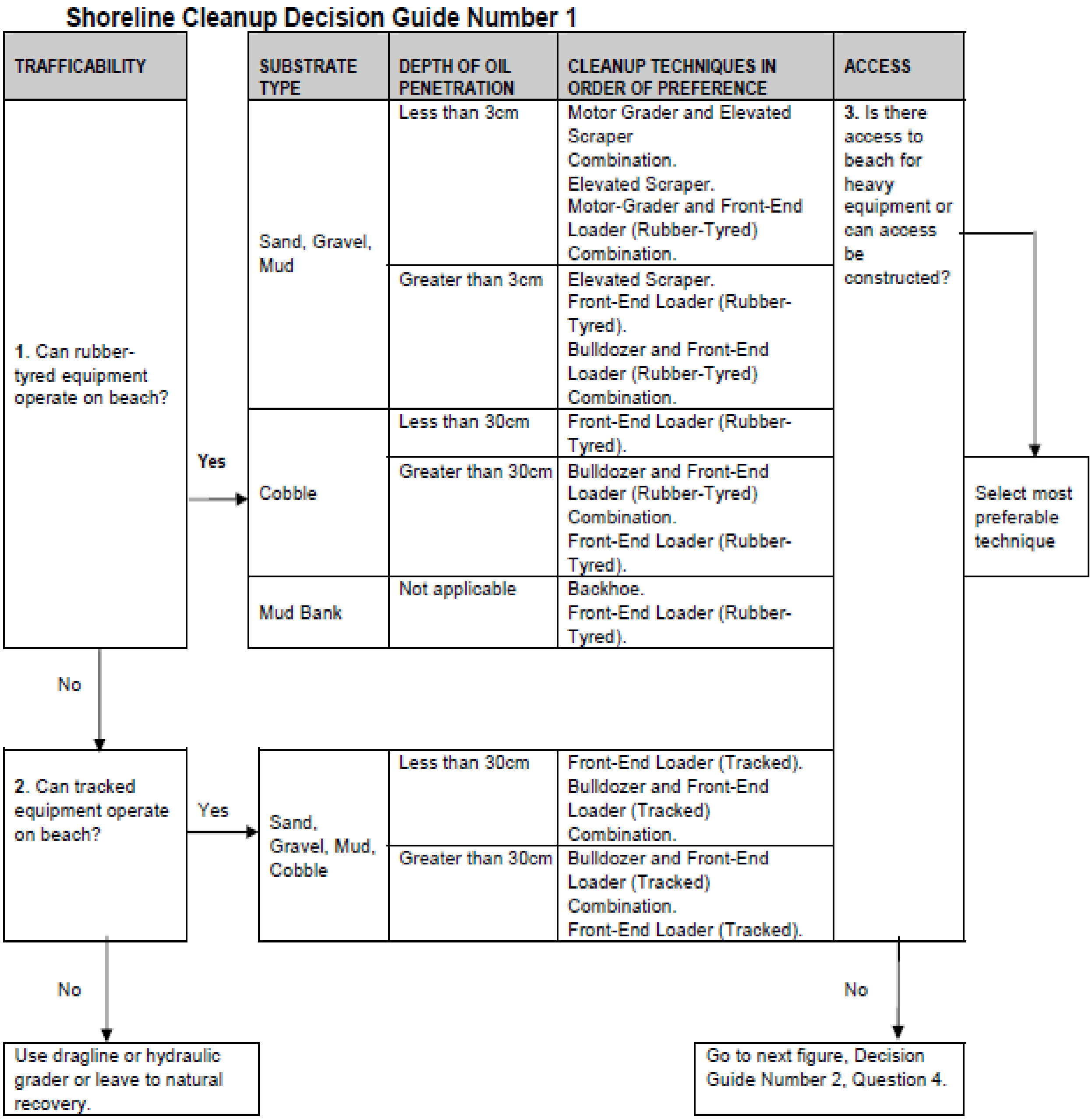


Figure K-2: Shoreline Clean-Up Decision Guide 1

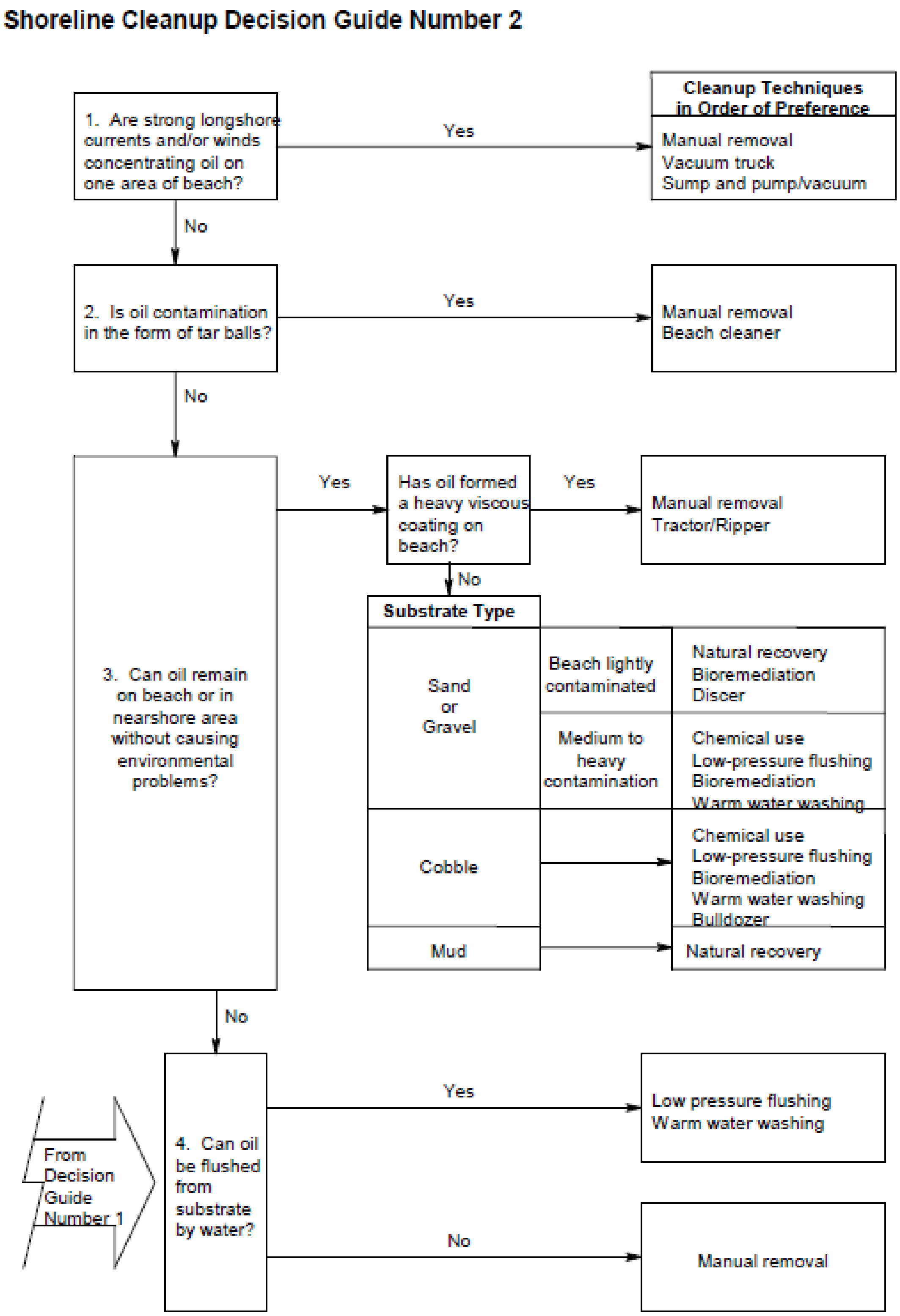


Figure K-3: Shoreline Clean-Up Decision Guide 2

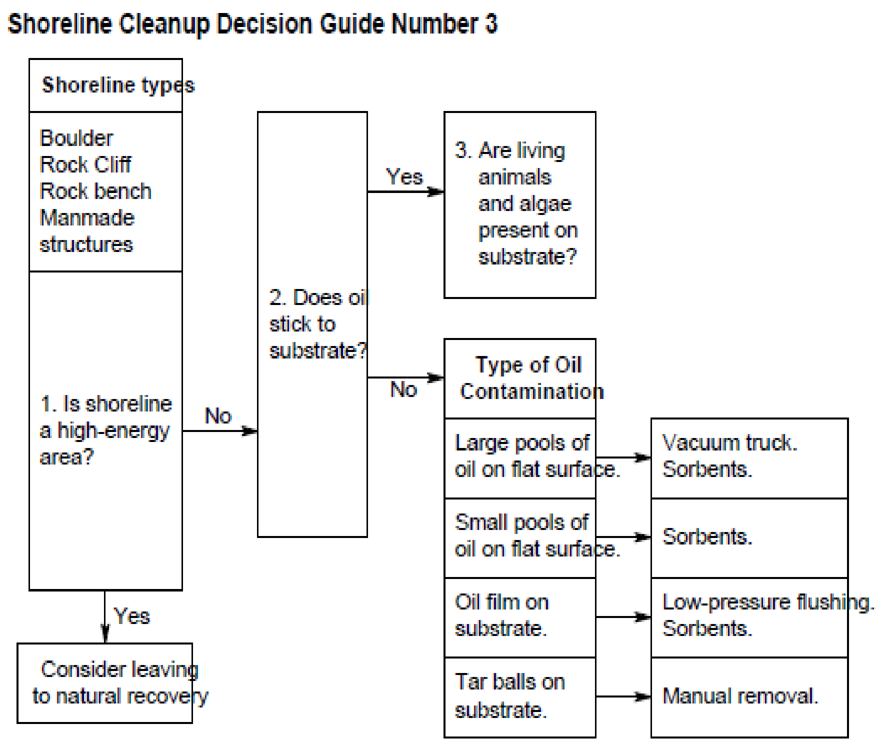


Figure K-4: Shoreline Clean-Up decision Guide 3

Appendix N: Operational Guidelines for Shoreline Response

Operational Guidelines for Shoreline Clean-up activities

1.1.1 Worksite preparation guidelines

The following provides guidelines for the preparation of staging areas supporting shoreline clean-up operations.

Organisation and worksite set-up

The worksite does not only include the polluted areas that require cleaning. Several other specific areas must be identified and cordoned off and routes for pedestrians and vehicles should be signposted.

These specific areas are:

- The polluted area;
- The waste storage area, with different types of containers suitable for the different kinds of waste;
- The decontamination area: whatever the size of the spill, a decontamination phase for operational personnel, equipment and tools must be carried out in order to provide some comfort to personnel after each work session, avoiding oiling clean areas, and group together personal clean-up equipment and protective gear, to facilitate the management of the site (cleaning, storage, re-use);
- A rest area, with at least changing rooms, toilets, a first aid kit and cold and hot beverages. Cold or even hot meals can also be organised on the spot provided that a canteen tent or temporary building is available; and
- A storage area for tools and machinery (or equipment warehouse).

Access to the worksite should be restricted and traffic of vehicles should be strictly regulated to avoid accidents.

Preparation

- Prevent the general public from accessing the worksite;
- Delineate accesses for vehicles and machinery (check load-bearing capacity) and routes;
- Channel vehicle and pedestrian traffic;
- Protect the ground (geotextile, roll out mat system…) during operations in sensitive areas (dunes...);
- Prepare and signpost the different areas of activity (on the beach), living areas (locker room, meals, showers, toilets...) and stockpiling areas presenting a risk (fuel, equipment, waste pit....);
- Define a site for fluid storage away from the locker room:
    - Provide an extinguisher for each cabin
    - Set up a recovery system for fuel leaks
- Provide at least minimum lighting for installations and the surrounding area during the winter.

Basic Equipment	Extra Equipment
✓ Plastic liners, geotextiles ✓ Barrier tape and stakes ✓ Signposting equipment	✓ Bins, barrels, skips, tanks ✓ Hot and cold beverages Welfare) ✓ Cooking oil, soap (Welfare) ✓ Earthmoving equipment

PRIMARY STORAGE OF WASTE

A primary storage site is:

- ✓ An emergency staging area of the immediate deposit of the waste collected before its transfer to either an intermediate long term storage site or if possible directly to a treatment facility; and
- ✓ A key stage in the waste management process for sorting, labelling and quantifying the types and volumes of waste collected and when possible, reducing volumes to be transported by pre-treatment.

The storage site must be closed as soon as clean-up operations are completed.

The return of the site to its original condition implies:

- ✓ A contamination diagnosis made by an organisation specialised in ground pollution, decontamination operations if needed and the approval of the authorities; and
- ✓ In some cases, botanical evaluations to define a plant cover restoration operation.

✓ Segregate the different types of waste ✓ Protect containers from rain water and to contain odours ✓ Protect containers from prolonged exposure to sunlight if necessary ✓ Ensure security to prevent unauthorised dumping

Primary waste storage sites should meet certain criteria:

- ✓ Close proximity to the site of clean-up;
- ✓ Good access to roads for heavy lorries; and
- ✓ A flat area with enough space away from environmentally-sensitive areas (vegetation, groundwater) and out of reach of the sea tides and waves.

- ✓ Depending on the volume of waste, site characteristics and availability of containers, prepare:
  - o Staging areas
  - o Pits if necessary
  - o Platform within earth berms
  - o Platform for bagged solids and liquids in tank.
- ✓ Protect areas using watertight plastic liners
- ✓ Lay fine gravel or sand at the base of the storage area to protect the membranes
- ✓ Prepare rain water or effluent management
- ✓ Ensure correct labelling of the containers to avoid mixing the different types of waste (liquid, solid, non-biodegradable – oiled plastics, contaminated cleanup equipment, biodegradable – oiled seaweed, faunal)
- ✓ Control access to the cleanup sites and protect access routes using lining and/or geotextiles

BASE CAMP/REST AREA

The rest area (base camp) should at least consist of:

- ✓ Changing rooms;
- ✓ Toilets; and
- ✓ A rest area.

At base camp, operators must be provided with:

- ✓ A first aid kit; and
- ✓ Hot and cold beverages, meals.

Selection of the rest area must meet certain criteria:

- ✓ Close proximity to the clean-up site;
- ✓ Easy access; and
- ✓ A flat area with enough space away from environmentally sensitive areas.

Equipment

- ✓ Shelter/rest area (tent, temporary building;
- ✓ Portable toilets (at least one for men and one for women);
- ✓ Locker rooms;
- ✓ First aid kit;
- ✓ Fire extinguisher; and
- ✓ Communication equipment.

STORAGE AREA FOR EQUIPMENT AND MACHINERY

This area consists of and equipped repair and maintenance site.

In order to avoid incidents and clean-up equipment failures, equipment should only be used by trained personnel and all equipment should regularly be checked for conformity with standard operating procedures and safety.

- ✓ Check and adjust daily levels of gasoline, diesel, oil, water and other fluids
- ✓ Regularly maintain the machines (pumps, pressure washers...)
- ✓ Equipment must be checked, counted by the person in charge of logistics and stored daily at the end of the work day
- ✓ Some pieces of equipment must be washed or at least rinsed daily, with proper recovery of cleaning effluent, other kinds of equipment should be washed weekly or at the end of operations
- ✓ Set up a systematic maintenance-cleaning-repair operation at the end of each week
- ✓ Small tools and equipment and even detachable parts of all equipment remaining outside should be securely stored away (eg stainless steel bucket of small sand screeners)
- ✓ In case of interruption of operations, large pieces of equipment should be moved to a supervised site
- ✓ Regularly check equipment for conformity and safety

The storage area for equipment and machinery must meet certain criteria:

- ✓ Close proximity to the site of clean-up;
- ✓ Easy access; and
- ✓ A flat area with enough space away from environmentally-sensitive areas.

Equipment

- ✓ Cabins;
- ✓ Hut;
- ✓ Maintenance equipment and tools; and
- ✓ Cleaning equipment.

1.1.2 Manual clean-up guidelines

Oil, polluted sediment and debris are removed by hand or with the help of manual tools and then stored for disposal.

Conditions of use

- ✓ Pollution : all types ; most often scattered pollution; on large spills, if implementation of other techniques is impossible;
- ✓ Pollutant : all types;
- ✓ Substrate : all types; sufficient load bearing capacity for pedestrians and light equipment; and
- ✓ Site: all types sufficiently accessible and which tolerate intensive traffic.

Equipment

Basic Equipment:

- ✓ Scrapers (paint scrapers, long handle scrapers...), rakes, brushes, forks; and
- ✓ Landing nets, shovels, trowels.

Extra Equipment:

- ✓ Waste containers, big bags, bins, plastic bags; and
- ✓ Front-end loader (for disposal).

PPE: At least protective clothing: overalls, boots, gloves, etc. depending on the nature of the pollutant, expose and responder activity.

- ✓ Divide the response personnel among three functions:
  - o Collection/scraping/gathering
  - o Placing in bags/waste containers
  - o Disposal
- ✓ Rotate the teams among the three functions;
- ✓ The waste can be disposed of manually or with the use of mechanical means if possible;
- ✓ Don’t overfill bins, plastic bags; and
- ✓ Don’t remove excessive quantities of sediments.

Impact

- ✓ Impact insignificant to heavy, depending on the type of substrate. Risk of destroying the structure of the substrate in marshes. Erosion;
- ✓ Potentially destructive effects on vegetation (dunes, marshland);
- ✓ Deconstruction and destabilisation of the foot of the dune (upper end of beach); erosion, destruction of the dune and the associated vegetation, decrease in biodiversity and fertility by reduction of the low water mark; and
- ✓ Can tend to fragment the oil in certain conditions.

Performance

This is a highly selective technique, but requires a lot of time and personnel. If not done correctly, there is a risk of removal of large quantities of clean sediment.

1.1.3 Mechanical clean-up guidelines

This technique consists of collecting the oil in order to facilitate its removal from the beach. Collection is carried out using a tractor, ATV or earthmoving vehicle or earthmoving equipment.

Conditions of use

- ✓ Pollution : heavy pollution, continuous slick;
- ✓ Pollutant : slightly to very viscous oil;
- ✓ Substrate : vast, flat foreshore with wet fine-grain sand (very damp to saturated) and a good load-bearing capacity, without ripple marks; and
- ✓ Site: accessible and sufficient load bearing capacity for earthmoving equipment, sufficiently large to allow vehicles to manoeuvre.

Equipment

Basic equipment:

- ✓ Backhoe loader;
- ✓ Grader/bulldozer;
- ✓ Tractor or loader with front blade; and
- ✓ Front-end loader or lorry (for removal).

PPE: At least suitable for heavy machinery operation

Impact

- ✓ Normally only removes the oil, but some sediment may also be taken with it (if the operator is poorly supervised or inexperienced), especially if used on light pollution or an unsuitable site;
- ✓ High risk of disturbance due to traffic and mixing of oil with sediment; and
- ✓ May lead to reduction of beach stability and beach erosion/loss of beach area.

Minimum workforce required: 2 people per vehicle (1 drive + 1 assistant)

Waste: oil mixed with a varying quantity of sediment; but can rapidly become unselective if scraping is carried out on moderate pollution (should be avoided)

- ✓ Consists of bringing the oil together in order to facilitate its removal from the beach. Scraping is carried out using a tractor or earthmoving equipment fitted with a front end blade in an oblique position. According to the viscosity of the oil, two options are available:
  - o (case 1) fluid oil: radial or converging scraping towards a collection point on the foreshore; removal by pumping
  - o (case 2) more viscous oil /solids: concentration to form windrows, by successive slightly curing passes parallel to the water line; subsequent removal of windrows
- ✓ Should only be carried out on heavy pollution; do not use on moderate to light pollution
- ✓ Inform and supervise operators; use experienced operators
- ✓ Work methodically
- ✓ Set up traffic lanes on the beach in order to reduce oil and sediment mixing

- ✓ Don’t remove excessive amounts of non-contaminated materials
- ✓ Don’t fill the bucket of loader more than 2/3 capacity
- ✓ Don’t drive on polluted materials

1.1.5 Shoreline vessel access guidelines

There are numerous landing craft vessels available in the North West Shelf area. These vessels are capable of grounding out; therefore the vessels can access a contacted area on high tide, ground out, unload equipment and personnel, reload with waste oil then depart on the next high tide. Landing craft vessels are supplied through Quadrant Energy existing vessel suppliers.

Mechanical equipment and PPE are to be mobilised to the nominated marine operational base for onward movement to the affected locations.

For shoreline clean-up of remote islands the following guidelines will be considered so as to minimise the secondary impacts of high numbers of spill response personnel on shorelines:

Vessels are to be mobilised to the designated deployment Port to mobilise shoreline clean-up teams by water. The shoreline clean-up will be undertaken through on-water deployment to the defined shorelines in 4 stages:

(1) Drop off of 6-person clean-up containers (refer below) to shoreline contact locations defined by IMT through observation data;

(2) Deployment of marine and environmental specialists to demarcate the clean-up zones with barrier posts and tape to prevent secondary impacts to flora and fauna by the clean-up teams;

(3) Deployment of small clean-up teams with a trained/competent shoreline responder as a Team Leader to conduct clean-up methods (flushing, bag and retrieve, etc.) with all waste being bagged and stored in temporary bunding made of HDPE above the high-high tide mark; and

(4) Deployment of the waste pickup barges to retrieve collected wastes from the temporary bunding and to complete the shoreline clean-up and final polishing.

Appendix O: Scientific Monitoring Plans

1 Scientific Monitoring Principles

1.1 Monitoring Design

In the event of an oil spill the monitoring design will depend upon the nature of the spill, the availability of baseline data in relation to the spill extent and expert opinion. In order to ensure the application of robust designs and sampling approaches which have the highest likelihood of detecting an environmental impact while allowing suitable flexibility, this plan provides a set of Guiding Principles for monitoring design and sampling (**Table 1**). A structured decision making framework for allocating monitoring effort in both time and space is described in **Figure 1**.

Table 1: Guiding Principles for Oil Spill Monitoring Design and Methodologies.

Principle	Explanation	Key guiding references
Match baseline	Designs and methodologies should follow those used in appropriate baseline studies wherever possible.	N/A
Comprehensive sampling	Sampling methods should seek to sample the full range of taxa within each assemblage. This may require the use of several complimentary techniques (the exception is if indicator taxa are employed; see below).	N/A
Reliable indicator taxa	If indicator taxa are targeted then the choice of indicator should be defensible, and a link to the response of the broader assemblage demonstrated. Indicators of ecosystem function should also be considered.	Hilty and Merenlender (2000)
Appropriate sample area or volume	Size of sampling unit should be determined based on the level of clustering of individuals and whether the goal is to quantify this clustering, or establish low inter-sample variability (probably more the latter for oil spill studies).	Kenkel et al. (1989)
Reduce within sample variation over time	Wherever possible repeated measures are carried out on the same sample space in order to reduce within treatment variation.	N/A
Compositing of samples	Appropriate compositing to increase statistical power should be considered.	Carey and Keough (2002)
Account for environmental gradients and partition variations	Sources of variation are considered and compartmentalised to best reduce within treatment variation, and thereby maximise power to detect an impact. This is managed through several means:	English et al. (1997), Snedecor and Cochran (1989)

Principle	Explanation	Key guiding references
	Environmental covariates are considered in sampling design recorded and incorporated statistically. A hierarchical or stratified sampling design is used to address variation at multiple scales Design is standardized, by sampling equivalent strata (e.g., level of exposure, depth etc.).	
Assess statistical power	Where null-hypothesis tests are planned, statistical power of the design is assessed prior to execution.	Gerrodette (1987) Legg and Nagy (2006) Toft and Shea (1982)
Appropriate sampling extent	Sample the range of hydrocarbon concentration (and at least the upper end).	Skalski (1995)
Independence amongst samples	Site selection should aim for independence amongst samples and potential spatial or temporal autocorrelation should be considered.	Hurlbert (1984)
Reduce observation error	Observer bias and amongst observer variation should be considered.	Thompson and Mapstone (1997)
Appropriate spatial replication	Sites are replicated. A limitation is that there is only one spill, but control sites should be replicated and spatially Interspersed. Ideally, the design should be able to detect an impact at several possible scales.	Underwood (Underwood 1991, 1992, 1994)
Appropriate temporal replication	Sampling should account for natural temporal variation.	Underwood (Underwood 1991, 1992, 1994)

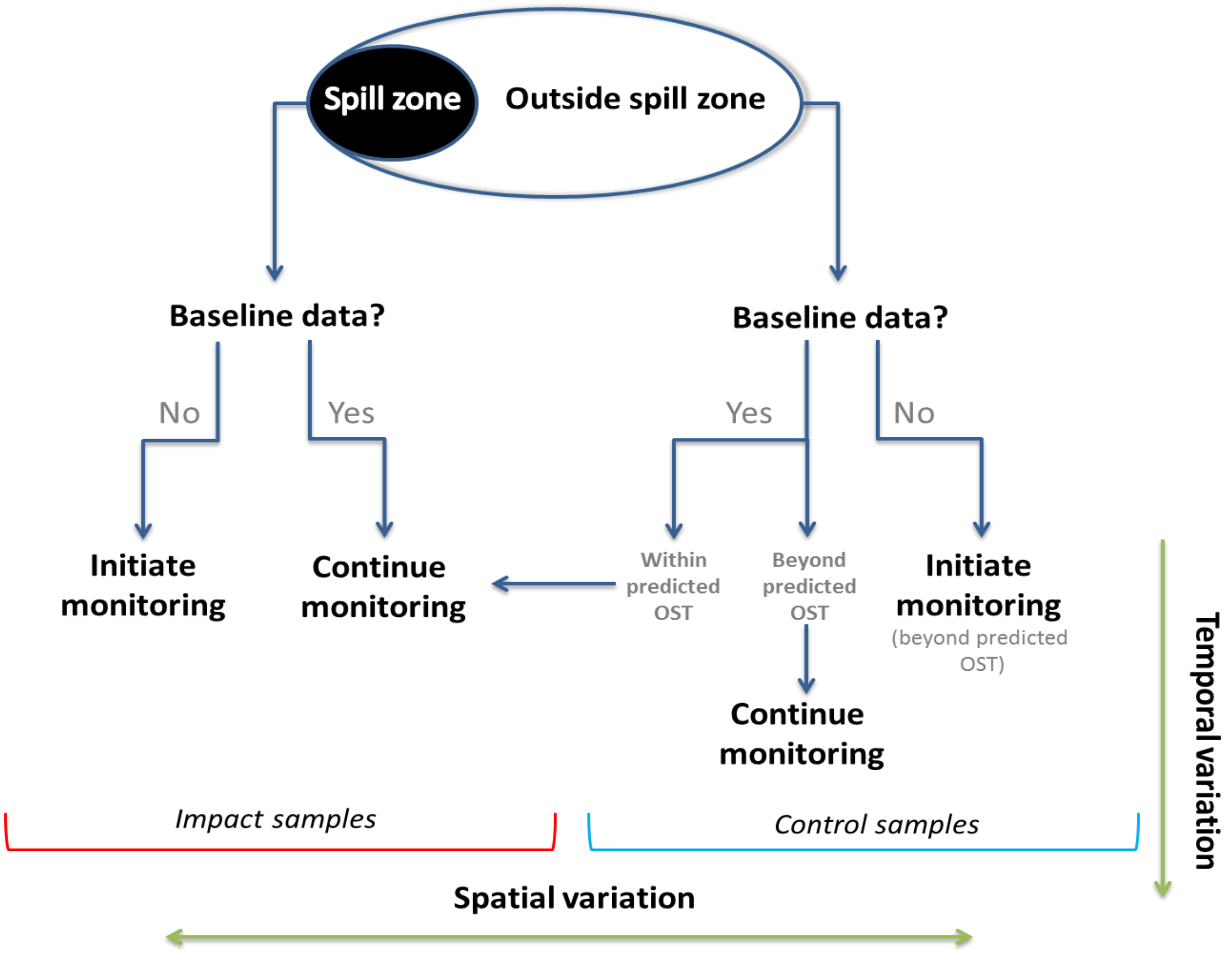


Figure 1: Structured Decision Making Process Based on Gregory et al. (2012) in Reference to Monitoring Programs, the Availability of Baseline Data, and Oil Spill Trajectory. An ideal design sampling would occur across a gradient of exposure rather than 'impact' and 'control' per se.

1.2 Data Analysis

Appendix B details the most important approaches to statistical analysis and related sampling design. These approaches are summarised in Table 2 (below). An important consideration is how this information is best summarised and communicated to guide further decision making and management. **Appendix B** also describes the reporting of environmental outcomes through the use of report card systems and includes a summary of their structure and design.

Table 2: Summary of Data Analysis Techniques.

Analysis type		Description	Strength	Limitations	Addressing limitations
Gradient analysis		Impact is quantified in terms of distance from spill.	Can be established post-spill.	Doesn't account for inherent spatial patterns present prior to spill.	Include spatial covariates in model. Incorporate a temporal component.
Control chart	Univariate	Single variable is monitored and plotted over time, and breaching of control limits tested.	Control sites are not required. Takes account of natural variation in system.	Control limits do not necessarily have biological meaning. Doesn't control for broader spatial scale temporal variation.	Include control charts for control sites which incorporate broad scale temporal variation.
	Multivariate	Multiple variables are combined, monitored and plotted over time, and breaching of control limits tested.	Ability to combine suite of data (e.g. community composition) into one variable. Sites plots not required.	Individual responses are masked. Control limits do not necessarily have biological meaning. Significant control limits challenging to define. Direction of change is undefined.	Compliment with graphical approaches to identify direction of change and individual species responses.
	Reference	Control limits are based on knowledge of biological system (e.g. minimum viable population size, toxicity).	Control limits have recognised biological meaning or consequence.	Control limits may be considered arbitrary.	Use established standards for control limits.

Analysis type	Description	Strength	Limitations	Addressing limitations
BACI	Quantifies state before and after potential impact, and also at impacted and control sites. Impact is tested by statistical interaction of terms.	Controls for natural variation, by incorporating control sites.	Limited power to detect significant impact. Requires appropriate matching of control (non-impacted) sites. Requires pre-impact data.	Increase power by increasing temporal component. Choose indicators with low natural variability.

2 Scientific Monitoring Plans by Receptor

Table 3 provides a glossary of an SMP as prepared in this report.

Table 3: Glossary of Scientific Monitoring Plans.

SMP Receptor	
Rationale	Importance of receptor, possible impact and importance of monitoring program.
Aim	Description of program aim(s)
Baseline	Refer to **Table 2**, detailed in Baseline Data Review (Astron Environmental Services 2019) (QE-00-BI-20001)
Contact	Contact is defined as occurring where any aerial, visual or florescence observation reports submitted to the Incident Command Team (ICT) show presence or likely presence of oil; or spill fate modelling predicts oil at sensitive receptors of > $1 g/m^2$ for surface oil, and >10 ppb for entrained and dissolved oil. This then activates the relevant SMP, which determines if any impact has occurred based upon applicable thresholds.
Initiation criteria	Initiation criteria, based on data from OMPs.
Termination criteria	Termination criteria based on analysis of Scientific Monitoring data translated to the Incident Management Team (IMT) through the planning function.
Receptor impact	Measured states and pressures according to the State-Pressure-Response model.
Methodological approach	Descriptions of sampling methods in order to carry out scientific monitoring, including reference to methods described in an appendix.
Scope of works	Timeline for scope of works (SoW) development.
Statistically significant	The basis of the significance is determined by the methodological approach as outlined in the relevant SMP.
Resources	List of required resources which may not necessarily be listed within a description of a particular method as described in **Appendix C**.
Implementation	Mobilisation requirements for service provider(s).
Analysis and reporting	Summary of analysis, data management and reporting.

SMP1 – Marine Water Quality	
Rationale	The release of hydrocarbons at sea will pollute marine waters via floating, entrained or dissolved aromatic hydrocarbons. The water quality SMP may also be used in conjunction with OMP1 (Surveillance and Monitoring), to inform the sampling design of other SMPs where objectives are to evaluate impact to and recovery of sensitive receptors, in relation to hydrocarbon contamination.
Aim	To monitor changes in water quality following an oil spill and associated response activities for the purpose of detecting a potential impact and recovery and for informing other scientific monitoring studies.
Baseline	Refer to the Baseline Data Review (Astron Environmental Services 2021) (SO-91-RF-20022 Rev 0). In addition, relevant available metadata will be reviewed for applicable marine water quality baseline data. In the absence of baseline data for hydrocarbons, data from appropriate reference sites will be used in place of the baseline values.
Initiation criteria	Upon notification of a Level 2 or 3 incident (a level 2 or 3 incident includes those which may have an adverse effect on the environment. This may be informed by operational water quality monitoring)
Termination criteria	Concentrations of hydrocarbon contaminants, attributable to the released hydrocarbon, are not significantly higher than baseline data or similar non-impacted sites data. In the absence of baseline or similar non-impact sites data, concentrations of hydrocarbon contaminants, attributable to the released hydrocarbon, are below the relevant hydrocarbon contaminant trigger level within the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (Australian and New Zealand Governments 2018), or the relevant regulatory site-specific trigger level (where these exist), if this is lower and values are not significantly different to reference sites. Forensic fingerprinting of the released hydrocarbon and water quality sample analysis by way of gas chromatography/mass spectrometry (GC/MS) may be used to determine the source of contaminants where this is not otherwise clear from operational monitoring.
Receptor impact	Impacts to specific receptors from hydrocarbons within marine waters are described in individual SMPs.
Methodological approach	Overall sampling design approach will be enacted according to the availability of baseline data guided by the structured decision-making process based on Gregory et al. (2012): 1. If sites are contacted in which long-term baseline data is available, a control chart (time-series) design will be applied; 2. If insufficient long-term baseline data is available, where appropriately matched baseline data sites are impacted and non-impacted, a before-after-control-impact (BACI) approach to monitoring will be applied;

SMP1 – Marine Water Quality	
	3. Where no baseline data sites are involved, a gradient approach to quantifying impacts will be applied. See **Appendix B** and **Figure 1** for detailed description of these approaches. The selection of potentially impacted and non-impacted sites will be informed by Operational Monitoring, including operational water quality monitoring and spill trajectory modelling. Sampling frequency will be dictated by the spatial extent of the spill, the number and location of sampling sites and the philosophy of the sampling design. Water profiles SMP1 – Marine Water Quality A water quality probe will be used to measure conductivity (to derive salinity in PSU), temperature and depth (CTD), dissolved oxygen (% and mg/L), turbidity (FNU or NTU), and fluorometry along a depth profile. Sampling methods will be aligned with the recommended standard operating procedures for the use of sensors for oil spill monitoring found in Appendix F of the Oil Spill Monitoring Handbook (Hook et al. 2016). Water quality Water quality samples will be taken along a similar depth profile as the CTD measures using a Niskin bottle, Van Dorn water sampler, rosette sampler or equivalent instrument. The laboratory(ies) will inform and supply the appropriate sample containers, storage requirements, holding times, detection limits/limit of reporting for required analytes and the analysis required for each sample. Water samples shall be analysed for key contaminants of concern including polycyclic aromatic hydrocarbons (PAHs), monocyclic aromatic hydrocarbons (including benzene, toluene, ethylbenzene, xylene), and nutrients, metals and chlorophyll-a. At each site, replicate water samples (at least three samples) will be collected to allow appropriate statistical analyses to be made including samples for quality assurance and quality control (QA/QC) purposes (i.e. split sample, triplicate sample, field blanks, transport blanks). Water sample collection and handling will align with Standard operating procedures found in the Oil Spill Monitoring Handbook (Hook et al., 2016), specifically the following sections: + Appendix A & B hydrocarbon analysis; + Appendix C Volatile Organic Compounds Analysis; and + Appendix D Surface Oil Analysis. Environmental DNA (eDNA) will also be collected to detect for the presence of marine species in the water column. Water samples will be collected in Nalgene bottles and sent to an appropriate laboratory for analysis. Sample processing will depend on holding times required (<8 hours ideal) and may involve filtering and freezing of each sample (Grochowsi and Stat 2017).

SMP1 – Marine Water Quality	
Scope of work	Prepared by monitoring provider for issue within 24 hours of SMP having been activated.
Resources	+ Marine scientist with experience in water quality sampling + Geographic Information Systems (GIS) personnel + National Association of Testing Authorities (NATA) accredited laboratories for water sample analysis + Vessel and tender in operation + Refuelling facilities + Sample containers and preservative + Sampling equipment + Decontamination/washing facilities + Safety aircraft/rescue vessels on standby
Implementation	Service provider able to mobilise within 72 hours of the SoW following approval by Santos (this time allows for costing, preparation of equipment and disposables and travel time to site).
Analysis and reporting	Chemical analysis will be carried out by NATA-accredited laboratories. A government endorsed laboratory for forensic fingerprinting (GS/MS) will be used. Data will be entered to spatially explicit database. Data will be analysed appropriately in order to determine if there was a statistical difference in water quality before and after a hydrocarbon impact. Data and conclusions will be summarised in an environmental report card. Final draft report to be prepared within one month of monitoring completion; external peer review of final draft within two weeks of report provision to reviewer; finalise report within two weeks of peer review having been completed.

SMP2 – Sediment Quality	
Rationale	Hydrocarbons released during a spill scenario may contact, settle and/or accumulate in marine sediments. Toxic substances found in accumulated hydrocarbons may lead to impacts to ecosystem processes associated with this primary producer habitat. Sediments and marine infauna will be sampled concurrently in order to establish potential correlations amongst the two parameters.
Aim	To monitor the fate and persistence of hydrocarbons in marine sediments following an oil spill and associated response activities. To monitor marine benthic infauna assemblages as an indicator of sediment quality, in relation to an oil spill and associated response activities.

<table>
<tr><th colspan="2">SMP2 – Sediment Quality</th></tr>
<tr><td>Baseline</td><td>Refer to the Baseline Data Review (Astron Environmental Services 2021) (SO-91-RF-20022 Rev 0).

In addition, relevant available databases will be reviewed for applicable marine baseline sediment quality and infauna data.

In the absence of baseline sediment quality data, hydrocarbon contaminant trigger values for marine sediments as listed in the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (Australian and New Zealand Governments 2018) will be used as a proxy for baseline levels.

Where other regulatory site-specific trigger levels exist, the lower of these levels and the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (Australian and New Zealand Governments 2018) levels will be used as proxy baseline levels.</td></tr>
<tr><td>Initiation criteria</td><td>Operational Monitoring or SMP1 indicates that contacted sediment or sediment predicted to be contacted by a hydrocarbon spill as defined in Table 1.</td></tr>
<tr><td>Termination criteria</td><td>Concentrations of hydrocarbons in marine benthic and shoreline sediments, attributable to the released hydrocarbon, are not significantly higher than baseline or similar non-impact sites.

In the absence of baseline or similar non-impact sites data, concentrations are below marine sediment quality interim guideline levels within the ANZG (2018), or the relevant regulatory site-specific trigger level (where these exist), if this is lower.

For infauna assemblages, abundance and species diversity/richness/composition are not significantly different from baseline (where baseline data exists) or are not statistically significantly different from comparable non-impacted benthic infauna assemblages.

Forensic fingerprinting of the released hydrocarbon and sediment quality samples by way of GC/MS may be used to determine the source of contaminants where this is not otherwise clear from operational monitoring.</td></tr>
<tr><td>Receptor impact</td><td>Impact to sediment quality is measured through change in hydrocarbon content and concentration. Change to sediment quality is also reflected by changes to infaunal assemblages. Potential impact to infaunal assemblages are measured through change(s) in:

+ Taxonomic diversity
+ Assemblage composition
+ Abundance of indicator species

Other pressures to these states are:

+ Discharge of other toxicants
+ Physical disturbance including dredging
+ Sedimentation
+ Introduction of marine pests</td></tr>
</table>

<table>
<tr><th colspan="2">SMP2 – Sediment Quality</th></tr>
<tr><td></td><td>+ Shading from marine infrastructure
+ Climate change</td></tr>
<tr><td>Methodological approach</td><td>Overall sampling design approach will be enacted according to the availability of baseline data guided by the structured decision-making process based on Gregory et al. (2012):
1. If sites are contacted in which long-term baseline data is available, a control chart (time-series) design will be applied;
2. If insufficient long-term baseline data is available, where appropriately matched baseline data sites are impacted and non-impacted, a before-after-control-impact (BACI) approach to monitoring will be applied;
3. Where no baseline data sites are involved, a gradient approach to quantifying impacts will be applied.
See Appendix B and Figure 1 for detailed description of these approaches. The selection of potentially impacted and non-impacted sites will be informed by Operational Monitoring, including operational water quality monitoring and spill trajectory modelling.
Sampling frequency will be dictated by the spatial extent of the spill, the number and location of sampling sites and the philosophy of the sampling design
<u>Sediment quality</u>
Operational Monitoring (including spill trajectory modelling) and the results of SMP1 Marine Water Quality monitoring will be used to inform the location of potentially impacted sediment sites.
Sediment monitoring sites in nearshore and shoreline locations will also consider and align where practicable, with sites selected for habitat monitoring (i.e. SMP3, 4, 5 and 6).
Sampling frequency will be dictated by the spatial extent of the spill, the number and location of sampling sites and the philosophy of the sampling design.
At each site, replicate sediment samples will be taken including those for QA/QC purposes.
Sediment grab (i.e. Van Veen or Box corer) or coring equipment will be selected based on water depth (offshore, inshore or shoreline) and sample size requirements.
Sediment sample collection and handling will align with Standard operating procedures found in the Oil Spill Monitoring Handbook (Hook et al. 2016), specifically the following sections according to sampling equipment utilised:
+ Appendix G hydrocarbon analysis (Grab samplers)
+ Appendix H hydrocarbon analysis (Ship borne corer)
+ Appendix H Manual push corer, and
+ Appendix O Sediment infauna.
The laboratory(ies) will inform and supply the appropriate sample containers, storage requirements, holding times, detection limits/limit of reporting for required analytes and the analysis required for each sediment sample.</td></tr>
</table>

SMP2 – Sediment Quality	
	Sediment samples shall be analysed for key contaminants of concern including metals, hydrocarbons, nutrients, particle size distribution, and nutrients. <u>Infauna samples</u> A subset of the sediment sample shall be sieved in the field (if time permits) with collected infauna preserved (10% buffered formalin or 70% ethanol as prescribed by the receiving laboratory) and sent to laboratory for identification of infauna to lowest taxonomic resolution possible. eDNA will also be collected to detect for the presence of marine infauna species in sediments. Sediment will be removed from the surface of a subset of the sediment sample and sent to an appropriate laboratory for analysis.
Scope of work	Prepared by monitoring provider for issue within 24 hours of SMP having been activated.
Resources	+ Marine scientist with field experience in deep sea sediment sampling + Scientist with skills in infauna identification + GIS personnel + NATA accredited laboratory for sample contaminant analysis + Laboratory for infauna sorting and taxonomic identification + Vessel with appropriate davit/winch to deploy grab/corer equipment and tender in operation + Refuelling facilities + Decontamination/washing facilities + Safety aircraft/rescue vessels on standby
Implementation	Service provider to be capable of mobilising within 72 hours of the SoW having been approved by Santos. Actual mobilisation time will depend on the decision to adopt post-spill pre-impact monitoring and associated timing requirements.
Analysis and reporting	Sediment samples analysed by NATA-accredited laboratories for presence and concentrations of hydrocarbons associated with the spill including full suite PAHs and total organic carbon. A government endorsed laboratory for forensic fingerprinting (GC/MS) will be used. Infauna samples sorted and identified by qualified marine invertebrate specialist to acceptable taxonomic groups. Data will be entered to spatially explicit database and analysed statistically in order to detect significant differences among sites. Data and conclusions will be summarised in an environmental report card. Final draft report to be prepared within one month of monitoring completion; external peer review

SMP2 – Sediment Quality	
	of final draft within two weeks of report provision to reviewer; finalise report within two weeks of peer review having been completed.

SMP3 – Sandy Beaches and Rocky Shores	
Rationale	Contact of entrained oil and stranded floating oil of shoreline habitats may occur on sandy beaches and rocky shores. Rocky and sandy shores provide habitat for a variety of intertidal organisms, which in turn provide food for shorebirds. Large tides tend to create a large degree of horizontal zonation amongst taxa. Rocky and sandy shores are included within the one receptor as they are often spatially mixed and both represent high energy regions.
Aim	To monitor changes in biota of sandy and rocky shoreline habitats in relation to an oil spill and associated activities.
Baseline	Refer to the Baseline Data Review (Astron Environmental Services 2021) (SO-91-RF-20022 Rev 0). In addition, relevant available databases shall be reviewed for applicable rocky shoreline and sandy beach biota baseline data.
Initiation criteria	+ Operational monitoring, SMP1 or SMP2 indicates that rocky and/or sandy shorelines are contacted or predicted to be contacted by a hydrocarbon spill as defined in **Table 1**.
Termination criteria	Shoreline assemblage structure, and hydrocarbon concentration levels in representative invertebrate species, are not significantly different from their baseline state (where baseline data exists) or are not statistically significantly different from comparable non-impacted assemblages; AND SMP2 Sediment Quality monitoring at the site has been terminated AND Shoreline clean-up at the site has been completed.
Receptor impact	Impact to shoreline invertebrates from pressures including hydrocarbons is measured through change in: + Species diversity + Assemblage composition + Abundance of indicator taxa. Other pressures to these states are: + Physical disturbance + Discharge of toxicants + Litter/waste + Introduction of marine pests

SMP3 – Sandy Beaches and Rocky Shores	
	+ Over-collection + Nutrification + Climate change.
Methodological approach	Monitoring will be designed as follows: 1. Where long-term baseline data sites are contacted, a control chart (time-series) design will be applied. 2. Where appropriately matched baseline data sites are impacted and non-impacted, a BACI approach to monitoring will be applied. 3. Where no baseline data sites are involved, a post-spill pre-impact (preferable) or gradient approach to quantifying impacts will be applied. Owing to potentially high spatial variation in assemblage structure, post-spill pre-impact monitoring will be a priority where no baseline data exists. If this opportunity is not available, a gradient approach to monitoring will be applied. Sampling frequency will be dictated by the number and location of sampling sites and the philosophy of the sampling design. Rocky shoreline intertidal assemblages (fauna and flora) will be monitored using a quadrat/transect approach, with the positioning of quadrats/transects accounting for any natural variation in assemblage structure along a seaward-landward gradient. Assemblage structure to be recorded through in-situ counts of fauna and flora or still images taken for further analysis. Sandy shoreline infauna will be sampled by way of replicated grab/core samples. Sampling sites within impacted and non-impacted areas to consider any cross-shore gradient in assemblage structure that may exist. Where baseline data exists, the methodology will be adapted to available data so that results are comparable. Samples to be sieved with collected infauna preserved (10% buffered formalin or 70% ethanol as prescribed by the receiving laboratory) and sent to laboratory for identification of fauna to lowest taxonomic resolution possible. Process to follow that for baseline data where this pre-exists. Biomonitoring of hydrocarbon concentrations in shoreline invertebrates will occur through collection of replicated tissue samples from representative, and preferably widely available species, across impact and non-impacted locations. The laboratory(ies) will supply and inform the appropriate method for collection, storage and holding times of tissue samples for required laboratory analysis and to avoid cross-contamination among samples. Where limitations in the distribution and abundance of representative invertebrate species preclude collection of sufficient samples for analysis, in-situ biomonitoring using a locally available species (e.g. the use of caged oysters) shall be considered for assessing spatial and temporal changes in bioaccumulation of hydrocarbon concentrations in invertebrates across impact and reference sites.

SMP3 – Sandy Beaches and Rocky Shores	
Scope of work	Prepared by monitoring provider for issue within 24 hours of SMP being activated.
Resources	+ Senior Scientist with experience in shoreline macroinvertebrates sampling + Supporting Scientist + GIS personnel + Helicopter or available vessel and tender in operation + Refuelling facilities + Sample containers and preservative + Decontamination/washing facilities + Safety aircraft/rescue vessels on standby + Laboratory facilities for sorting and taxonomic identification of specimens
Implementation	With the aim of collecting post-spill pre-impact data, service provider able to mobilise within 72 hours of the SoW having been provided to them (this time allowing for costing, preparation of equipment and disposables and travel to site). Actual mobilisation time will depend on the decision to adopt post-spill pre-impact monitoring and associated timing requirements.
Analysis and reporting	Specimens not identified in situ (in the field) will be processed and identified in the laboratory by appropriately qualified scientists. Biota tissue samples (if collected) analysed for hydrocarbon contaminants by NATA-accredited laboratories. Data will be entered to spatially explicit database and analysed in order to test for significant difference between impacted and non-impacted assemblages. Data and conclusions will be summarised in an environmental report card. Final draft report to be prepared within one month of monitoring completion; external peer review of final draft within two weeks of report provision to reviewer; finalise report within two weeks of peer review having been completed.

SMP4 – Shorelines and Coastal Habitats - Mangrove Communities	
Rationale	In the event of Tier 2 or 3 spill, mangroves may be contacted by floating or entrained oil. Mangrove health may be adversely affected due to increased concentration of hydrocarbons in sediments and coating due to surface oil, which in turn can lead to leaf-loss, mortality and a reduction in areal extent of mangrove habitat. This plan's focus is mangrove vegetation. Associated monitoring of sediment quality and mudflat fauna is described in SMP2 and SMP5, respectively.

SMP4 – Shorelines and Coastal Habitats - Mangrove Communities	
Aim	To monitor changes to mangrove extent and health in relation to an oil spill and associated activities.
Baseline	Refer to the Baseline Data Review (Astron Environmental Services 2021) (SO-91-RF-20022 Rev 0). Baseline extent and of mangroves is monitored by remote sensing in several regions, and further historical and post-impact data for mangrove health and extent can be obtained as remotely sensed imagery (e.g., Sentinel, Landsat and WorldView).
Initiation criteria	Operational Monitoring, SMP1 or SMP2 indicates that mangroves are contacted or predicted to be contacted by a hydrocarbon spill as defined in **Table 1**.
Termination criteria	Mangrove extent and health are not significantly different from their baseline state (where baseline data exists) or are not statistically significantly different from comparable non-impacted mangroves; AND Sediment quality monitoring (SMP2) at the site has been terminated; AND Shoreline response at the site has been completed.
Receptor impact	Impact to mangroves from pressures including hydrocarbons is measured through change in: + Tree health + Aerial extent. Other pressures to these states are: + Physical disturbance + Discharge of toxicants + Litter + Introduction of marine pests + Dust + Sedimentation from human activities + Climate change.
Methodological approach	Remote sensing data will be accessed for the purpose of detecting change in aerial cover and change in canopy health through and index of plant health (e.g., NDVI or MSAVI) (Astron Environmental Services 2013). Where long term on-ground baseline monitoring has occurred, further post impact on-ground monitoring should be carried out to complement any analysis of remote sensing. Analysis of long-term on-ground monitoring data will be as follows: 1. Where long-term baseline data sites (only) are contacted a control chart (time-series) design will be applied.

SMP4 – Shorelines and Coastal Habitats - Mangrove Communities	
	1. Where appropriately matched baseline data sites are impacted and non-impacted, a BACI approach to monitoring will be applied. 2. Where no baseline data sites are involved a gradient approach to quantifying impacts will be applied (See **Appendix B** for detailed description of these approaches and **Figure 1,** detailed in Baseline Data Review (Astron Environmental Services 2019) (QE-00-BI-20001)). On-ground monitoring of mangroves will aim to detect change in mangrove health, including canopy cover and plant/leaf health indices. Field methodology will follow the routine monitoring techniques currently employed for Santos operations (Quadrant Energy Australia Limited 2018), adapting where required to align with pre-existing baseline field data, where available. Sampling of sediments as per SMP2 will occur at mangrove health assessment sites to allow any changes in mangrove health to be related to sediment hydrocarbon levels. In-field mangrove health sampling frequency will be dictated by the number and location of sampling sites and the sampling design applied.
Scope of work	Prepared by monitoring provider for issue within 24 hours of SMP being activated.
Resources	+ Senior Scientist with experience in mangrove condition assessment + Supporting Scientist + GIS and remote-sensing personnel + Available vessel in operation + Satellite and/or aerial imagery
Implementation	On-ground monitoring will only occur where long-term baseline data has been collected, and hence no post-spill pre-impact data collection will be required. On-ground post-spill data will be collected at an appropriate time as guided by the analysis of remote sensing imagery, and potential on-ground assessment.
Analysis and reporting	Data will be entered to spatially explicit database and analysed in order to test statistically significant change to parameters associated with hydrocarbon spill. Data and conclusions will be summarised in an environmental report card. Final draft report to be prepared within one month of monitoring completion; external peer review of final draft within two weeks of report provision to reviewer; finalise report within two weeks of peer review having been completed.

SMP5 – Shorelines and Coastal Habitats - Intertidal Mudflats	
Rationale	Intertidal mudflat communities are primary producer habitats which support invertebrate fauna, which in turn provides a valuable food source for shorebirds. High diversity of infauna (particularly molluscs) occur within these habitats and may be affected by

SMP5 – Shorelines and Coastal Habitats - Intertidal Mudflats	
	penetrating oil. At high tide, these habitats become foraging grounds for vertebrates such as rays and sharks. These habitats are at high risk of impact as the sheltered environments promote high faunal diversity combined with low-energy wave action.
Aim	To monitor changes in intertidal mudflat communities associated with an oil spill and associated activities.
Baseline	Refer to the Baseline Data Review (Astron Environmental Services 2021) (SO-91-RF-20022 Rev 0). In addition, relevant available baseline databases shall be reviewed for applicable intertidal mudflat infauna baseline data.
Initiation criteria	+ Operational Monitoring, SMP1 or SMP2 indicates that mudflat habitats are contacted or predicted to be contacted by a hydrocarbon spill as defined in **Table 1**.
Termination criteria	Mudflat infaunal assemblages are not significantly different from their baseline state (where baseline data exists) or are not statistically significantly different from comparable non-impacted assemblages; AND SMP2 Sediment Quality monitoring at the site has been terminated; AND Clean-up of the shoreline site has been completed.
Receptor impact	Impact to mudflat epifauna and infauna from pressures, including hydrocarbons, is measured through change in: + Species diversity + Assemblage composition + Abundance of indicator taxa. Other pressures to these states are: + Physical disturbance + Discharge of toxicants + Overfishing (bait collecting) + Introduction of marine pests + Climate change.
Methodological approach	Monitoring will be designed as follows: 1. Where long-term baseline data sites are contacted, a control chart (time-series) design will be applied. 2. Where appropriately matched baseline data sites are impacted and non-impacted, a BACI approach to monitoring will be applied. 3. Where no baseline data sites are involved a post-spill pre-impact (preferable) or gradient approach to quantifying impacts will be applied (See **Appendix B** for detailed description of these approaches and **Figure 1**).

SMP5 – Shorelines and Coastal Habitats - Intertidal Mudflats	
	Owing to potentially high spatial variation in assemblage structure, post-spill pre-impact monitoring will be a priority if baseline data are not available. If this opportunity is not available, a gradient approach to monitoring will be applied. Mudflat infauna will be sampled by way of replicated grab/core samples. Sampling sites within impacted and non-impacted areas to consider any cross-shore gradient in assemblage structure that may exist. Where baseline data exists methodology to adapt to available data such that results are comparable. Sites selected for mudflat infauna sampling to be concurrently sampled for sediment quality as per SMP2. Sampling frequency will be dictated by the number and location of sampling sites and the philosophy of the sampling design. Samples to be sieved with collected infauna preserved (buffered formalin or 70% ethanol as prescribed by the receiving laboratory) and sent to laboratory for identification of fauna to lowest taxonomic resolution possible. Process to follow that for baseline data where this pre-exists.
Scope of work	Prepared by monitoring provider for issue within 24 hours of SMP being activated.
Resources	+ Senior Scientist with experience in epifauna and infauna assessment and sampling + Supporting Scientist + GIS personnel + Helicopter or available vessel and tender in operation + Refuelling facilities + Decontamination/washing facilities + Safety aircraft/rescue vessels on standby
Implementation	With the purpose of collecting post spill pre-impact data, service provider able to mobilise within 72 hours of the scope of work having been provided to them (this time allowing for costing, preparation of equipment and disposables and travel to site). Actual mobilization time will depend on the decision to adopt post-spill pre-impact monitoring and associated timing requirements.
Analysis and reporting	Data will be entered to spatially explicit database and analysed to determine significant differences between impacted and non-impacted assemblages. Data and conclusions will be summarised in an environmental report card. Final draft report to be prepared within one month of monitoring completion; external peer review of final draft within two weeks of report provision to reviewer; finalise report within two weeks of peer review having been completed.

SMP6 – Benthic Habitats	
Rationale	Benthic habitats are those habitats associated with the seafloor. Major benthic habitats at risk are: + Coral reefs (likely high susceptibility to spill) + Macroalgae and seagrass (likely moderate susceptibility to spill) + Non-coral benthic filter feeders (likely moderate susceptibility to spill) + Sub-tidal pavement (likely moderate susceptibility to spill) + Soft-substrate (likely lower susceptibility to spill). Macroalgal and seagrass communities are important primary producers that also provide habitat, refuge areas and food for fish, turtles, dugongs, and invertebrates. Seagrass and macroalgae also increase structural diversity and stabilise soft substrates. Non-coral benthic filter feeders, which include sponges, molluscs, sea whips and gorgonians, are considered indicators of disturbance due to their immobility and long life cycles. Corals are important primary producers that provide food, substrate, and shelter for a diversity of marine life, including invertebrates and fish. They also protect coastlines from wave erosion and provide important substrate for algae. Undisturbed intertidal and subtidal coral reefs occur in several locations throughout the region.
Aim	To monitor changes in the cover and composition of benthic habitats in relation to an oil spill and associated activities. To monitor change in hard coral health and reproduction in relation to an oil spill and associated activities.
Baseline	Refer to the Baseline Data Review (Astron Environmental Services 2021) (SO-91-RF-20022 Rev 0). In addition, relevant available baseline metadata databases will be reviewed for applicable benthic habitat and coral health and reproduction baseline data. Remote sensing data, satellite and aerial imagery previously acquired may also be applicable for shallow clear-water benthic habitats to detect changes in benthic habitat cover and composition. Pollution-induced change to benthic habitat cover and composition may take some time to be detected. Therefore, post-spill, pre-impact benthic survey data will be collected when required to have a baseline state following initial oil contact.
Initiation criteria	Benthic habitat cover and composition Operational Monitoring, SMP1 or SMP2 indicates that subtidal benthic habitats are contacted or are predicted to be contacted by a hydrocarbon spill. Coral health and reproduction + Operational Monitoring, SMP1 or SMP2 indicates that coral habitat is contacted or is predicted to be contacted by a hydrocarbon spill as defined in **Table 1**.

SMP6 – Benthic Habitats	
Termination criteria	<u>Benthic habitat cover and composition</u> Cover and composition of benthic habitats are not statistically significantly different from that of their baseline state (where baseline data exists) or are not statistically significantly different from comparable non-impacted assemblages. <u>Coral health and reproduction</u> Hydrocarbon concentration in corals, reproductive state and settlement indices are not statistically different from the baseline state (where baseline data exists) or from comparable non-impacted assemblages.
Receptor impact	Impact to benthic habitats from pressures including hydrocarbons is measured through change in: + Species diversity + Assemblage composition + Percent cover. Other pressures to these states are: + Physical disturbance + Discharge of toxicants + Introduction of marine pests + Shading + Climate change.
Methodological approach	Monitoring design will be as follows: 1. Where long-term baseline data sites are contacted, a control chart (time-series) design will be applied. 2. Where appropriately matched baseline data sites are impacted and non-impacted, a BACI approach to monitoring will be applied. 3. Where no baseline data sites are involved, a gradient approach to quantifying impacts will be applied (See **Appendix B** for detailed description of these approaches and **Figure 1**). <u>Benthic Habitat Cover and Composition</u> Field survey methodology will be based upon acquiring repeat digital imagery (video or still images) of benthic habitats along random transects (preferable), using a stratified sampling approach at each site to target different habitat types and depths where clear gradients in these conditions exist. Site selection and image acquisition methodology will aim to align applicable baseline studies where these exist, such that imagery is comparable. The number of sites and frequency of sampling will depend upon the sampling design philosophy.

SMP6 – Benthic Habitats	
	Divers, towed video or remotely operated vehicles (ROVs) will be employed to collect imagery considering safety aspects and the depth of water at survey locations. Where divers are employed, fish species may also be recorded where practicable (for example following methodologies employed by Babcock et al. (2008) to contribute to SMP11. <u>Coral Health and Reproduction</u> Using divers, selected coral colonies will have tissue samples removed for the purpose of laboratory analysis of the concentration of accumulated hydrocarbons and for determining reproductive state, noting sampling for reproductive state will be dependent upon the timing of coral spawning. Reproductive state will be determined from measures of gamete size, stage and fecundity determined from in-field examination and laboratory analysis of histological samples. In addition to the standard suite of ecotoxicology testing done on the released hydrocarbon as part of the Operational Monitoring Program, ecotoxicology testing of the released hydrocarbon on the larval competency of representative coral species will be conducted. Settlement plates will be deployed to monitor settlement of coral recruits following spawning periods to ascertain the level of coral recruitment at impacted and non-impacted sites.
Scope of work	Prepared by monitoring provider for issue within 24 hours of SMP being activated.
Resources	+ Senior Marine Scientist with experience in benthic habitat assessment + Supporting Scientist + Divers or ROV operators + GIS personnel + Available vessel in operation + Decontamination/washing facilities + Safety aircraft/rescue vessels on standby + Diving equipment or ROVs + Video recording facilities + Satellite imagery
Implementation	Service provider is to be able to mobilise within 72 hours of the SoW being approved by Santos (this time allowing for costing, preparation of equipment and disposables and travel to site). Actual mobilisation time will depend on the decision to adopt post-spill pre-impact monitoring and associated timing requirements.

SMP6 – Benthic Habitats	
Analysis and reporting	Digital imagery will be analysed using a point-count technique (using software such as AVTAS, Coral Point Count with Excel extensions (CPCe) or TransectMeasure (SeaGIS)) to estimate the percentage cover of biotic and abiotic categories (in line with the CATAMI classification scheme) comprising the benthic habitat. Biotic categories to include the following as applicable: corals; macroalgae and seagrass; and non-coral benthic filter feeders. Live, dead and bleached coral cover shall be recorded. The imagery collected will allow for the determination of percent cover, abundance, measurement of size (if scaling lasers are included in the image) and a visual assessment of health (Kohler and Gill 2006). NATA accredited laboratory analysis to determine the concentration of hydrocarbons within coral tissue. Reproductive output to be determined by complementary means, including in-field and laboratory analysis of gametes, including microscopic examination of histological samples preserved in the field. Coral larval competency tests to be conducted by ecotoxicological laboratory in addition to standard suite of ecotoxicological tests using released hydrocarbon. Data will be entered to spatially explicit database and analysed to determine significant differences between impacted and non-impacted assemblages. Data and conclusions will be summarised in an environmental report card provided as part of report. Final draft report to be prepared within one month of monitoring completion; external peer review of final draft within two weeks of report provision to reviewer; finalise report within two weeks of peer review having been completed.

SMP7 – Seabirds and Shorebirds	
Rationale	Marine waters and coastal habitats in the EMBA contain key habitats that are important to birds, including offshore islands, sandy beaches, tidal flats, mangroves and coastal and pelagic waters. These habitats support a variety of birds which utilise the area in different ways and at different times of the year. Birds can be broadly grouped according to their preferred foraging habitat as coastal/ terrestrial birds, seabirds and shorebirds, both migratory and resident. For the purposes of this document, seabirds and shorebirds are defined as: + shorebirds – those birds that inhabit and feed in the intertidal zone and adjacent areas and are resident or migratory, using the area principally during the austral summer. + seabirds – those birds associated with the sea and deriving most of their food from it, and typically breeding colonially, including the marine raptors osprey and white-bellied sea eagle.
Aim	Quantify seabirds and shorebirds, in the spill and response areas.

SMP7 – Seabirds and Shorebirds	
	Quantify lethal and/or sub-lethal impacts of hydrocarbon spill exposure on seabirds and shorebirds. Monitor changes in seabird populations (reproductive success) in relation to the hydrocarbon spill and clean-up activities.
Baseline	Refer to the Baseline Data Review (Astron Environmental Services 2021) (SO-91-RF-20022 Rev 0). The Oil Spill Response Atlas (Australian Maritime Safety Authority (AMSA)), National Conservation Values Atlas (Department of Agriculture, Water and the Environment (DAWE) (http://www.environment.gov.au/webgis-framework/apps/ncva/ncva.jsf) and any local oiled wildlife response plans should also be consulted.
Initiation criteria	Operational monitoring indicates that known foraging, roosting or nesting areas for seabirds and/or shorebirds has been contacted, or are predicted to be contacted, by a hydrocarbon spill; OR Operational monitoring indicates that seabirds and shorebirds have been contacted, or are predicted to be contacted, by a hydrocarbon spill as defined in **Table 1**.
Termination criteria	Detectable levels of hydrocarbons attributable to the hydrocarbon spill are not present in seabird and shorebird tissues; AND Measured variables are not statistically significantly different from their baseline or pre-spill state (where these data exist) or from measured variables at non-impacted sites; AND Monitoring is terminated in consultation with the relevant environmental authority (relevant regional authority and/or DAWE).
Receptor impact	Impact to seabirds and shorebirds from pressures including hydrocarbons is measured through change in: + Species diversity + Bird abundance + Health/condition + Breeding success (resident species only). Other pressures to these states are: + Physical disturbance of foraging and nesting habitat + Accidental chemical spillage + Entanglement in litter + Displacement by less favourable species (e.g. Silver Gull) + Predation + Climate change.

SMP7 – Seabirds and Shorebirds	
Methodological approach	Monitoring design will be as follows: 1. Where long-term baseline data sites are contacted a control chart (time-series) design will be applied. 2. Where appropriately matched baseline data sites are impacted and non-impacted, a BACI approach to monitoring will be applied. Given the ease of survey establishment, post-spill pre-impact monitoring will be attempted wherever practicable in order to established pre-impact state. 3. Where no baseline data sites are involved a gradient approach to quantifying impacts will be applied (See **Appendix B** for detailed description of these approaches and **Figure 1,** detailed in Baseline Data Review (Astron Environmental Services 2019) (QE-00-BI-20001)). Monitoring for seabirds and shorebirds will measure abundance and diversity in key foraging/roosting areas with the timing of surveys to coincide with seasonal peaks in abundance. The seabird and shorebird roost count monitoring will follow current accepted survey methodology, such as Birdlife Australia's Australian Shorebird Monitoring Program and survey guidelines standardised by the DAWE (Department of the Environment and Energy 2017). Monitoring of seabirds to focus on nesting (burrow) density, breeding participation and breeding success, taking measurements of the number of adults, eggs and chicks with the timing of surveys to allow assessments immediately after egg laying and immediately prior to chick fledging. Bird mortality to be recorded during monitoring of seabirds and shorebirds with tissue samples taken from dead birds for hydrocarbon analysis in the laboratory. Necroscopies will follow the process of Gagnon and Rawson (2010).
Scope of work	Prepared by monitoring provider for issue within 24 hours of SMP being activated.
Resources	+ Experienced seabird biologist + Experienced shorebird biologist + Personnel with pathology or veterinary skills + NATA accredited laboratory for sample analysis and necropsy + Available vessel and tender in operation + Decontamination/washing facilities + Safety aircraft/rescue vessels on standby
Implementation	Service provider able to mobilise within 72 hours of the scope of work having been provided to them (this time allowing for costing, preparation of equipment and disposables and travel to site).

SMP7 – Seabirds and Shorebirds	
	Actual mobilisation time will depend on the decision to adopt post-spill pre-impact monitoring and associated timing requirements.
Analysis and reporting	Data will be entered to spatially explicit database and analysed in order to determine significant differences between impacted and non-impacted assemblages. Data and conclusions will be summarised in an environmental report card. Draft annual report to be prepared within one month of monitoring completion; external peer review of final draft within two weeks of report provision to reviewer; finalise report within two weeks of peer review having been completed.

SMP8 – Marine Mammals	
Rationale	At least 11 species of listed marine mammals are known to, or are thought to occur, in Australian waters within the environment that may be affected. These include cetaceans (whales and dolphins) and sirenians (dugong). Effects to marine megafauna due to presence of surface oil, entrained oil and dissolved aromatic hydrocarbons may include behavioural (e.g. deviation from migratory routes), physiological (e.g. disruption to digestion) or physical effects. Given large spatial variation in occurrence and broad scale movement, population estimates, and associated change are not often available. This plan will focus on assessing the extent of impacts to animals within the region, and where possible, the level of recovery. This will then be used to deduce potential impacts at a population level.
Aim	To monitor short and long-term environmental effects on marine mammals that may have resulted from the hydrocarbon spill and associated response.
Baseline	Refer to the Baseline Data Review (Astron Environmental Services 2021) (SO-91-RF-20022 Rev 0). The Oil Spill Response Atlas (Australian Maritime Safety Authority (AMSA)), National Conservation Values Atlas (DAWE -http://www.environment.gov.au/webgis-framework/apps/ncva/ncva.jsf) and local oiled wildlife response plans should also be consulted.
Initiation criteria	Operational monitoring indicates that marine mammals are contacted or predicted to be contacted by a hydrocarbon spill as defined in **Table 1**.
Termination criteria	Restoration or resumption of key biological processes (e.g. abundance, distribution, breeding) necessary to ensure post-impact recovery is demonstrated. Specific criteria to be developed by Marine Scientist(s) with expertise in marine mammals of the region; AND No further instances of dead marine mammals with detectable levels of hydrocarbons attributable to the hydrocarbon spill; AND Monitoring is terminated in consultation with the relevant environmental authority (relevant regional authority and/or DAWE).

SMP8 – Marine Mammals	
Receptor impact	Impact to marine mammals from pressures including hydrocarbons is measured through observed injury and mortality. Other pressures to these states are: + Physical disturbance + Entanglement in fishing gear and litter + Accidental chemical spillage + Climate change + Over-exploitation.
Methodological approach	Aerial and marine surveys will be implemented to identify individuals in proximity of the spill and to quantify damage: + Aerial surveys will follow the protocols of Hedley et al. (2011), **Appendix C8** + Marine surveys will follow the protocols of Watson et al. (2009), **Appendix C8** Tissue sampling of dead or injured animals will follow the protocols of: + Department of Environment and Heritage (DEH) (2006) (Cetaceans) + Eros et al. (2000) (Dugongs).
Scope of work	Prepared by monitoring provider for issue within 24 hours of SMP being activated.
Resources	**Aerial survey** + Senior Marine Scientist + Trained marine wildlife observers x 2 + Fixed wing aircraft (incl. pilot/s) + Refuelling facilities **Vessel-based survey** + Senior Marine Scientist + Trained marine wildlife observers x 2 + Personnel with pathology or veterinary skills + NATA accredited laboratory for sample analysis and necropsy + Available vessel in operation + Sample container and preservative + Decontamination/washing facilities + Safety aircraft/rescue vessels on standby

SMP8 – Marine Mammals	
Implementation	Service provider able to mobilise within 72 hours of the scope of work having been approved by Santos (this time allowing for costing, preparation of equipment and disposables and travel to site). Actual mobilisation time will depend on the decision to adopt post-spill pre-impact monitoring and spill timing requirements.
Analysis and reporting	Data will be entered to spatially explicit database. Data and conclusions will be summarised in an environmental report card. Statistical power related to these receptors is likely to be low, due to observational data and small sample sizes. Therefore, the assessment of quantified impacts will be corroborated with marine scientist(s) with expertise in relevant fauna. Draft annual report to be prepared within one month of annual monitoring completion; external peer review of final draft within two weeks of report provision to reviewer; finalise report within two weeks of peer review having been completed.

SMP9 – Marine Reptiles	
Rationale	At least 10 species of listed marine reptiles are known to, or are thought to occur, in Australian waters within the environment that may be affected. This includes six species of marine turtle that occur in, use the waters, and nest on sandy beaches, two species of sea snake and one species of estuarine crocodile found in most major rivers systems of the Kimberley region and in the Northern Territory. Impacts to marine reptiles due to presence of surface oil, entrained oil and dissolved aromatic hydrocarbons may include behavioural, physiological (e.g. disruption to digestion) or physical effects.
Aim	To observe and quantify the presence of marine reptiles in the spill and response areas, and broader regional areas. To assess and quantify lethal impacts or sub-lethal impacts of this exposure or interactions. To monitor changes in marine reptile populations in relation to an oil spill and associated activities.
Baseline	Refer to the Baseline Data Review (Astron Environmental Services 2021) (SO-91-RF-20022 Rev 0). The Oil Spill Response Atlas (Australian Maritime Safety Authority (AMSA)), National Conservation Values Atlas (DAWE -http://www.environment.gov.au/webgis-framework/apps/ncva/ncva.jsf) and local oiled wildlife response plans should also be consulted.
Initiation criteria	Operational monitoring indicates that marine reptiles or nesting sites are contacted or likely to be contacted by a hydrocarbon spill; OR Operational monitoring indicates that marine reptiles are contacted, or are predicted to be contacted, by a hydrocarbon spill as defined in **Table 1**.

<table>
<tr><th colspan="2">SMP9 – Marine Reptiles</th></tr>
<tr><td>Termination criteria</td><td>Detectable levels of hydrocarbons attributable to the hydrocarbon spill are no longer present in marine reptile tissues collected from live or dead individuals; AND

In the event that an impact attributable to the hydrocarbon spill is detected on marine reptiles, the measured parameters are not statistically significantly different from their baseline or pre-spill state (where these data exist) or from measured parameters at non impacted sites; AND

Monitoring is terminated in consultation with the relevant environmental authority (relevant regional authority and/or DAWE).</td></tr>
<tr><td>Receptor impact</td><td>Impact to marine reptiles from pressures including hydrocarbons is measured through change in:
+ Abundance
+ Health/condition
+ Nesting success (turtles and crocodiles).

Impact to other marine reptiles from pressures including hydrocarbons is measured through change in observed injury and condition.

Other pressures to these states are:
+ Lighting and flares causing disorientation (turtles)
+ Vessel strike
+ Physical disturbance of nesting sites
+ Predation
+ Entanglement in fishing gear and litter
+ Accidental chemical spillage
+ Habitat loss or change due to dredging
+ Climate change
+ Over-exploitation.</td></tr>
<tr><td>Methodological approach</td><td>Abundance

In-water impacts – aerial surveys.

Shoreline impacts – ground surveys (either rapid census survey or tagging program).

Health/condition

In-water impacts – vessel surveys (collecting observations on animal condition and collection of tissue samples or dead specimens for analysis).

Shoreline impacts – ground surveys (collecting observations on animal condition and collection of tissue samples or dead specimens for analysis).

Dead reptiles will be collected for autopsy following Gagnon (2009).</td></tr>
</table>

SMP9 – Marine Reptiles	
	Reproductive success Shoreline impacts – ground surveys (detailed tagging and/or nesting success studies). Design of ground surveys will be applied as follows: 1. Where long-term baseline data sites are contacted a control chart (time-series) design will be applied. 2. Where appropriately matched baseline data sites are impacted and non-impacted, a BACI approach to monitoring will be applied. 3. Where no baseline data sites are involved, and timing allows, a post spill pre-impact approach will be attempted. 4. If a post-spill pre-impact approach is not practicable, a gradient approach to quantifying impacts will be applied
Scope of work	Prepared by monitoring provider for issue within 24 hours of SMP being activated.
Resources	**Aerial survey** + Senior marine scientist + Trained marine wildlife observers x 2 + Fixed wing aircraft (incl. pilot/s) + Refuelling facilities **Vessel-based Survey** + Senior Marine Scientist + Trained marine wildlife observers x 2 + Personnel with pathology or veterinary skills + NATA accredited laboratory for sample analysis and necropsy + Available vessel in operation + Decontamination/washing facilities + Safety aircraft/rescue vessels on standby
Implementation	Service provider to be able to mobilise within 72 hours of the scope of work having been approved by Santos (this time allowing for costing, preparation of equipment and disposables and travel to site). Actual mobilisation time will depend on the decision to adopt post-spill pre-impact monitoring and spill timing requirements.
Analysis and reporting	Data will be entered to spatially explicit database. Turtle data will be analysed in order to test for significant differences between impacted and non-impacted assemblages. Data and conclusions will be summarised in an environmental report card.

SMP9 – Marine Reptiles	
	Owing to their observational nature and potentially low sample size, observed impacts to other reptile fauna will be corroborated with marine scientist(s) with expertise in relevant fauna for the region. Draft annual report to be prepared within one month of annual monitoring completion; external peer review of final draft within two weeks of report provision to reviewer; finalise report within two weeks of peer review having been completed.

SMP10 – Seafood Quality	
Rationale	Exposure of commercial and recreationally targeted demersal and pelagic fish species to entrained and dissolved aromatic hydrocarbons can cause flesh tainting and increase the levels of toxicants above human consumption guidelines. Aromatic hydrocarbons are carcinogenic to humans. This scope includes finfish, sharks and invertebrates (principally crustacea).
Aim	To identify potential human health risks due to the presence of hydrocarbon concentrations in the flesh of targeted seafood species for consumption.
Baseline	Refer to the Baseline Data Review (Astron Environmental Services 2021) (SO-91-RF-20022 Rev 0). Human health benchmarks relating to the exposure of PAHs shall be used to determine health effects as per Yender et al. (2002). Flesh samples from non-impacted sites to be used as baseline for olfactory analysis for flesh taint.
Initiation criteria	+ Operational monitoring and results from SMP1 predict or observes contact of oil to target species for consumption as defined in **Table 1**.
Termination criteria	The following termination criteria will be adopted in consultation with responsible fisheries and human health agencies. Hydrocarbon concentrations in seafood tissues are not above levels considered a human health risk; AND Flesh taint is not detected from olfactory testing of seafood samples; AND Target species are no longer exposed to hydrocarbons in the water column.
Receptor impact	Impact to seafood quality from hydrocarbons is measured through change in: + Toxicity indicators + Olfactory taint. Other pressures to these states are: + Accidental chemical spillage + Disease.

SMP10 – Seafood Quality	
Methodological approach	Target fish species determined from water quality monitoring results and relevant and available commercial and recreational-fished species. Sampling of target species will follow a gradient design (Gagnon and Rawson 2012) ranging from impacted to non-impacted (or non-suspect) catches using commercial and recreational fishing techniques undertaken by commercial and recreational fishers. Sampling method (netting, trawling, baited fish traps, spear fishing, line fishing) will be determined by habitat, target species and spill location. If more than one target species is affected, replicate samples of each species shall be collected, with a minimum of five replicate samples. Olfactory testing will follow Rawson et al. (Rawson et al. 2011) in **Appendix C10**, following the duo-trio method (Standards Australia 2005).
Scope of work	Prepared by monitoring provider for issue within 24 hours of this SMP being activated.
Resources	+ Senior marine scientist + Marine vessel + Sample containers and preservative + NATA accredited laboratory for sample analysis + Decontamination/washing facilities
Implementation	Service provider to be able to mobilise within 72 hours of the scope of work having been approved by Santos (this time allowing for costing, preparation of equipment and disposables and travel to site). Actual mobilisation time will depend on the decision to adopt post-spill pre-impact monitoring and spill timing requirements.
Analysis and reporting	Laboratories will be NATA-accredited for food standards analyses. Data will be stored in spatially explicit database and analysed to test for significant differences between impacted and non-impacted seafood. Final draft report to be prepared within one month of monitoring completion; external peer review of final draft within two weeks of report provision to reviewer; finalise report within two weeks of peer review having been completed.

SMP11 – Fish, Fisheries and Aquaculture	
Rationale	Impacts to fisheries species due to presence of entrained hydrocarbons may include lethal and sub-lethal physiological effects (e.g. reduced growth) and physical effects. The region comprises the Indo-West Pacific area which consists of a high diversity of fish species and assemblages and provides important spawning and nursery grounds for several fisheries species. Fish are concentrated in a number of biodiversity hotspots. The environment is also conducive to aquaculture including pearl production. Fisheries species that spawn or

SMP11 – Fish, Fisheries and Aquaculture	
	inhabit near shore areas face a greater risk to an oil spill than finfish found in deeper waters.
Aim	To monitor changes in structure and distribution of fish assemblages in relation to an oil spill and associated activities. To monitor the effect of hydrocarbon exposure and physiological condition on fisheries and aquaculture species.
Baseline	Refer to the Baseline Data Review (Astron Environmental Services 2021) (SO-91-RF-20022 Rev 0). In addition, available relevant survey databases shall be reviewed for applicable baseline data.
Initiation criteria	+ Operational monitoring indicates fish, fisheries or aquaculture are contacted or likely to be contacted by a hydrocarbon spill as defined in Table 1.
Termination criteria	Fish assemblages are not statistically significantly different than those of baseline or similar non-impacted assemblages; AND Hydrocarbon concentrations, physiological condition indices, and biomarker levels in affected fish and aquaculture species are not statistically significantly different from those of non-impacted samples; AND Termination of monitoring is done in consultation with the responsible fisheries agencies.
Receptor impact	Impact to fish, fisheries and aquaculture from pressures including hydrocarbon concentrations is measured through change in: + Species diversity + Abundance of indicator taxa + Assemblage structure + Health. Other pressures to these states are: + Accidental chemical spillage + Overfishing + Introduction of marine pests + Habitat disturbance + Climate change.
Methodological approach	Fish assemblages will be assessed using the stereo-baited remote underwater videos (BRUVs) following Shortis et al. (2009), **Appendix C11**. Fish assemblages will be randomly sampled within discrete habitats at cross-shelf impact areas and non-impact areas.

SMP11 – Fish, Fisheries and Aquaculture	
	Sampling design for fish assemblages will be as follows: 1. Where long-term baseline data sites are contacted a control chart (time-series) design will be applied. 2. Where appropriately matched baseline data sites are impacted and non-impacted, a BACI approach to monitoring will be applied. 3. If baseline data is not available, a gradient approach to quantifying impacts will be applied (See **Appendix B** for detailed description of these approaches and **Figure 1**). Where relevant, data available from responsible fisheries agencies including catch/effort data, will be assessed to determine potential changes from baseline levels in fishing grounds potentially affected by an oil spill compared to after the event. For fish and aquaculture species potentially exposed to an oil spill, species will be sampled across the contamination gradient as per Gagnon and Rawson (2012). Hydrocarbon concentrations (particularly PAH) within tissues of fish and aquaculture species will be determined. Exposure to hydrocarbons on fish health will also be determine through analysis of physiological indices and biochemical markers following Gagnon and Rawson (2012). If fish kills are observed, whole specimens will be obtained and preserved (frozen) for necropsy to determine the cause of death.
Scope of work	Prepared by monitoring provider for issue within 24 hours of this SMP being activated.
Resources	+ Senior marine scientist + Marine scientist trained in fish identification and necropsy + Marine scientist with BRUV experience + NATA accredited laboratory for sample analysis + Available vessel and tender in operation + Decontamination/washing facilities + Safety aircraft/rescue vessels on standby + Resources to analyse BRUV data.
Implementation	Service provider to be able to mobilise within 72 hours of the scope of work having been approved by Santos (this time allowing for costing, preparation of equipment and disposables and travel to site). Actual mobilisation time will depend on the decision to adopt post-spill pre-impact monitoring and spill timing requirements.
Analysis and reporting	BRUV imagery will be processed using EventMeasure (SeaGIS) software. NATA-accredited laboratories will be employed for health analyses. Data will be entered to spatially explicit database and analysed to test for statistically significant differences between non-impacted and impacted fish assemblages.

SMP11 – Fish, Fisheries and Aquaculture	
	Data and conclusions will be summarised in an environmental report card. Final draft report to be prepared within one month of monitoring completion; external peer review of final draft within two weeks of report provision to reviewer; finalise report within two weeks of peer review having been completed.

SMP12 – Whale Sharks	
Rationale	The whale shark (*Rhincodon typus*) is known to occur within the region. One of the best known aggregation sites occurs along the central and north-west coast of Western Australia from March to July. Whale sharks are also known to be highly migratory and a biologically important area for foraging extending into the Kimberley region of Western Australia also overlaps with the environment that may be affected. Effects to the whale shark due to presence of surface oil, entrained oil and dissolved aromatic hydrocarbons may include behavioural (e.g. deviation from migratory routes), physiological (e.g. disruption to digestion) or physical effects. Given large spatial variation in occurrence and broad scale movement, population estimates and associated change are not often available. This plan will focus on assessing the extent of impacts to animals within the region, and where possible, the level of recovery. This will then be used to deduce potential impacts at a population level.
Aim	To quantify impacts of an oil spill on whale sharks within Biologically Important Areas (BIAs) along the north-west and north Western Australian coastline.
Baseline	Refer to the Baseline Data Review (Astron Environmental Services 2021) (SO-91-RF-20022 Rev 0). The Oil Spill Response Atlas (Australian Maritime Safety Authority (AMSA)), National Conservation Values Atlas (DAWE -http://www.environment.gov.au/webgis-framework/apps/ncva/ncva.jsf) and Pilbara Region Oiled Wildlife Response Plan (Department of Parks and Wildlife and Australian Marine Oil Spill Centre 2014) should also be consulted.
Initiation criteria	Operational monitoring indicates that whale shark aggregations are contacted or likely to be contacted by a hydrocarbon spill as defined in **Table 1**.
Termination criteria	Measured parameters of whale shark abundance and distribution are not significantly different to baseline levels; AND The water quality at feeding/aggregation sites has been measured as not significantly different to baseline levels.
Receptor impact	Impact to whale sharks from pressures including hydrocarbons is measured through observed injury and mortality. Other pressures to these states are: + Intentional and unintentional mortality from fishing outside Australian waters

SMP12 – Whale Sharks	
	+ Boat strike + Habitat disruption from mineral exploration, production and transportation + Marine debris + Climate change.
Methodological approach	During spill activities may require the following surveys and sampling: + Aerial surveys + Satellite tagging + Toxicology + Food chain studies + Photo-identification + Vessel and plane logs + Acoustic tagging. The methodologies adopted will follow the approaches of those baseline studies identified allowing consistency of data from baseline to impact and recovery phases.
Scope of work	Prepared by monitoring provider for issue within 24 hours of this SMP being activated.
Resources	+ Senior marine scientist + Trained marine wildlife observers x 2 + Fixed wing aircraft (incl. pilot/s) + Refuelling facilities + Personnel with pathology or veterinary skills + NATA accredited laboratory for sample analysis + Available vessel and tender in operation + Decontamination/washing facilities + Safety aircraft/rescue vessels on standby
Implementation	Service provider to be able to mobilise within 72 hours of the scope of work having been approved by Santos (this time allowing for costing, preparation of equipment and disposables and travel to site). Actual mobilisation time will depend on the decision to adopt post-spill pre-impact monitoring and spill timing requirements.
Analysis and reporting	Draft annual report to be prepared within one month of annual monitoring completion; external peer review of final draft within two weeks of report provision to reviewer; finalise report within two weeks of peer review having been completed.

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Appendix P: SMP Activation Process

astron
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Oil Spill Operational and Scientific Monitoring Activation Form

Instructions
In the event of a spill requiring a response from Astron follow these steps: **1. Activate a response – call 1300 902 700** **2. Immediately complete this Activation Form and email to spillresponse@astron.com.au** **You will receive a call back from the Monitoring Coordinator within 30 minutes. In the event that a call back is not received, please call 1300 902 700 again.** Note: If new information should become available after submitting this form, or the situation changes, please advise the Astron Monitoring Coordinator as soon as possible.

Section 1: Contact Details		
Name of notifying person		
Position in Incident Command Team		
Direct phone		
Mobile		
Email address		
Command centre location		
Command centre direct phone		
Date and time of notification	Click here to enter a date.	Enter time, i.e. 1400 WST

Section 2: Spill Details							
Date and time of spill		Click here to enter a date.			Enter time, i.e. 1400 WST		
Spill source location (GDA94, MGA Zone 50)		Insert coordinates in GDA94 MGA Zone 50 format (easting and northing).					
		Insert location description					
Source of spill							
Cause of spill (if known)							
Status of spill		☐ Secured	☐Uncontrolled	☐Unknown			
Release rate	Instantaneous release						**State units**
	OR						
	Continuous release		per hour for		☐Hours	☐Days	
Description of spill	Estimated quantity						**State units**
	Incident tier	☐1	☐2	☐3			
	Direction of travel						
	Trajectory						
Modelling provider log in details							

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Oil Spill Operational and Scientific Monitoring Activation Form

Section 3: OMP/SMP activation	
SMPs to be activated. Where there is doubt whether an SMP should be activated the SMP should be selected. Refer to the Oil Spill Scientific Monitoring Plan (EA-00-RI-10099) for initiation criteria for SMPS.	☒SMP1 – Water quality ☒Operational water quality monitoring ☐SMP2 – Sediment quality ☐SMP3 – Sandy beaches and rocky shores ☐SMP4 – Mangroves ☐SMP5 – Intertidal mudflats ☐SMP6 – Benthic habitats ☐SMP7 – Seabirds and shorebirds ☐SMP8 – Marine megafauna ☐SMP9 – Marine reptiles ☐SMP10 – Seafood quality ☐SMP11 – Fish, fisheries and aquaculture ☐ Yet to be determined ☐ Other:________________________________

Section 4: Safety	
Detail any known safety or security risks	

Section 5: Approval	
I authorise the activation of a response by Astron Environmental Services Pty Ltd in connection with the above incident under the terms of Contract # [insert contract].	
Signature:	
Date and Time:	

Activate Our Team

In the event of a spill requiring scientific monitoring response call:

1300 902 700

Advise the operator:

1. **Your company**
2. **Your name and contact number**
3. **Brief reason for call (i.e. Exercise or Spill)**

A message will be relayed to our team to call you back.

↓

Provide additional details as requested by the Monitoring Coordinator on call-back

↓

Complete and submit the *Activation Form*

↓

Astron initiates Oil Spill Scientific Monitoring Activation & Response Process – refer to next page

Oil Spill Scientific Monitoring Activation and Response Process

Step	Responsibility	Action	Timeframe#	Resources	Date/Time Complete
Phase 1 – Activation					
1	Santos IMT (Environmental Team Leader (ETL))	Astron Monitoring Coordinator notified of incident.	On approval from Santos Incident Commander	Astron oil spill response phone number and answering service	
2	Astron Monitoring Coordinator (MC)	Call back client for further details, request *Activation Form* if not received.	Within 30 minutes of receiving initial notification	Activation Form	
3	Astron MC	Call Planning & Logistics Officer to advise of incident.	Immediately following Step 2	n/a	
4	Santos IMT (ETL)	Complete *Activation Form* and submit to Astron via email.	Within one hour following initial notification (Step 2)	Activation Form	
5	Astron Planning & Logistics Officer (PLO)	Notify MCT, Technical Advisors and key subcontractors via SMS Global.	Within 30 minutes of Step 3	SMS Global Guidance	
6	Astron PLO	Notify all staff of incident via SMS Global.	Within one hour of receiving Activation Form	SMS Global Guidance	
Phase 2 – Response Planning					
7	Astron MC	Maintain verbal communication with Santos IMT (ETL).	At least twice daily (0800 and 1700)	n/a	

Step	Responsibility	Action	Timeframe#	Resources	Date/Time Complete
8	Astron MC Astron Operations Officer Astron PLO	Maintain Functional Log.	Daily	Functional Log	
9	Astron PLO	Set up Command Room.	Within 4 hours of activation (Step 5)	Command Room Resource Checklist	
10	Astron MC, PLO and BMT Oceanica Operations Officer	Attend Santos incident briefing and relay information to MCT.	As advised by the Santos IMT (ETL)	n/a	
11	Astron Operations Officer	MCT and Technical Advisors to meet at Royal St office, review personnel and equipment resource status.	Within 6 hours of activation (Step 5)	Capability report Training matrix Resource chart	
12	Astron PLO	Confirm availability of additional personnel and equipment resources.	Within 16 hours of activation (Step 5)	External Supplier Details Requisition Request Form	
13	Santos IMT (ETL)	Provide spill trajectory modelling and sensitive receptor information to Astron.	When available	APASA modelling Department of Transport database Santos GIS Mapping	
14	Astron MC in consultation with Santos ETL	Define the scale of response - identify which SMPs are activated. Identify if operational water quality monitoring is required.	Within 2 hours of receiving spill and receptor information (Step 13).	Scientific Monitoring Plan* Relevant OPEP Spill trajectory modelling Operational monitoring results	

Step	Responsibility	Action	Timeframe#	Resources	Date/Time Complete
15	Astron Technical Advisors in consultation with Santos ETL	**Determine monitoring locations for activated SMPs:** • Identify monitoring locations in order of priority for activated SMPs based on: o nature of hydrocarbon spill o spill trajectory modelling and time to shoreline impacts o sensitive receptors impacted or potentially at risk of being impacted o state of current baseline data o current environmental conditions o current results of operational monitoring. • Determine if post-spill pre-impact data is required to be collected from any locations. See SMP Work Method Statements for decision making process when considering availability of baseline data.	Within 6 hrs of relevant SMP activation (Step 14).	Relevant SMPs Information from Astron: • baseline information for relevant receptors. Information from Santos IMT: • sensitive receptor information (including relevant conservation/management plans) from relevant EP, Santos GIS mapping and online resources (DoT oil spill response atlas, DoE conservation values atlas, DoE species profile and threats database) • oil spill trajectory modelling • response strategies and priority protection areas • results from OMPs currently activated • baseline information for relevant receptors as reference in the relevant SMP.	
16	Astron Technical Advisors in consultation with Santos ETL	Submit Department of Parks and Wildlife Licence applications	Within 12 hrs of relevant SMP activation (Step 14)	• Proposed monitoring locations • SMP methods	

Step	Responsibility	Action	Timeframe#	Resources	Date/Time Complete
17	Astron Operations Officer, PLO & Technical Advisors in consultation with Santos ETL	**Determine personnel requirements:** • Identify number and competencies of personnel required for monitoring teams for each SMP based on: o activated SMPs o number of locations to be monitored o number of locations where pre-spill baseline data needs to be collected o timing of hydrocarbon spill and overlap with sensitive receptors in activated SMPs o logistical and equipment resource constraints. • Arrange additional personnel if required.	Within 12 hrs of activation if pre-impact data is needed.**	Information from Astron: • Capability report • Training matrix • Resource chart • relevant SMPs and WMS. Information from Santos IMT: • sensitive receptor information • oil spill trajectory modelling • response strategies and priority protection areas • equipment (i.e. vessels, aircraft) availability • logistics (availability of flights, accommodation, etc).	
18	Astron Operations Officer, PLO & Technical Advisors in consultation with Santos ETL	**Determine equipment requirements:** • Identify number and competencies of equipment required for each SMP based on: o activated SMPs o number of locations to be monitored o number of field teams and timing of mobilisation to the field o logistical and equipment resource constraints. • Arrange additional equipment resources if required.	Within 12 hrs of activation if pre-impact data is needed.**	Information from Astron: • Resource chart • relevant SMPs and WMS. Information from Santos IMT: • equipment (i.e. vessels, aircraft) availability • logistics (availability of flights, accommodation, etc).	

Step	Responsibility	Action	Timeframe#	Resources	Date/Time Complete
19	Astron MC, Operations Officer, PLO & Technical Advisors	**Prepare and submit Monitoring Action Plan** (mission, objectives, strategies, tactics, tasks), including scope of works. **Prepare and submit cost estimate.** **Prepare and submit logistics request:** • Allocate personnel and equipment resources to field teams for relevant SMPs. • Submit SOW and logistics request for each activated SMP to Santos IMT for approval.	Within 24hrs of request for SoW (Step 15) for relevant SMP if pre-impact data is needed.**	Information from Astron: • Resource chart • relevant SMPs and WMS • agreed monitoring locations • Mobilisation and Logistics Form (incorporating SOW) • Monitoring Action Plan. Information from Santos IMT: • request for SoW • agreed monitoring locations.	
20	Santos IMT (ETL)	Santos to approve SOW, provide purchase order and initiate logistical arrangements.	Within 24 hours of SOW submission (Step 19).	Astron Mobilisation and Logistics Request	
21	Astron MC	Advise field personnel by email meeting invite, or phone if not in office.	Within 24 hours of SOW approval (Step 20).	Field team allocation	
22	Astron	Conduct incident briefing with all available Astron personnel.	Within 24 hours of SOW approval (Step 22).	Briefing template Monitoring Action Plan	
Phase 3 – Mobilisation					
24	Astron PLO	GIS and device preparation requests (field maps, data capture) submitted, and discussed with Geospatial team.	Within 24 hours of SOW approval (Step 22).	https://voyager/	
25	Astron Operations Officer	Conduct field team overview briefing, allocate tasks.	Within 36 hours of SOW approval (Step 22).	Briefing Template	

Step	Responsibility	Action	Timeframe#	Resources	Date/Time Complete
26	Field Team Leaders	Compile SMP grab packs, GIS information, field equipment, and prepare and submit HSE documentation to Santos IMT.	Within 48 hours of SOW approval (Step 22).	Information from Astron • SoW • Grab packs, SMP WMS and HSE documentation • GIS information/field maps • field equipment. Information from Santos IMT: • booking and logistics confirmations.	
27	Astron Technical Advisors	Conduct scope specific pre-mobilisation briefings.	Prior to mobilisation.	Pre-mob Briefing Template	
28	Santos ETL	Santos to approve HSE plan.	Within 24 hours of receiving HSE Plan.	Mobilisation and Logistics Form HSE plan	
29	Astron PLO	Personnel mobilised to site.	Within 72 hrs of SOW approval (Step 22) if pre-impact data is needed.**	Approved SOW	
Phase 4 – Response Operations					
30	Astron MC	Conduct Monitoring Action Plan review with MCT and Technical Advisors and communicate to Santos IMT (ETL).	Daily	Monitoring Action Plan template	
31	Astron PLO	Hold post-demobilisation debrief with field teams.	Within 3 days of demobilisation.	Demob Meeting Template	
32	Santos ETL	Santos to arrange approval of Monitoring Action Plan revisions and any additional mobilisation/logistics requirements.	Daily or as required	Monitoring Action Plan Mobilisation and Logistics Form	
33	Astron Field Team Leaders	Provide activity reports to Santos ETL.	Daily	Daily Activity Report Template	

Timeframes are indicative and may be require adjustment where activities are dependent on information availability or affected by logistical constraints

*The Scientific Monitoring Plan (EA-00-RI-10099) provides the most up to date list of SMPs and activation criteria. Refer to the OPEP for operational water quality monitoring requirements.

**If post-spill, pre-impact data is not required then timeframes will be specific to each SMP. The lead times for resourcing, preparation of SoW and mobilisation of field teams may be longer depending on the timing of the spill, likely trajectory and life stages of receptors present or likely to be impacted.

For example, in SMP4 if post-spill, pre-impact data collection is not required then mangrove decline is likely to take several weeks to occur and there is lower priority for mobilisation of field teams for this SMP within the 72 hr timeframe. In this case, mobilisation within 30 days may be more appropriate.

Abbreviations

EMBA – Environment that May Be Affected
IMT – Incident Management Team
OMP – Operational Monitoring Program
OPEP – Oil Pollution Emergency Plan
Santos – Santos Energy Australia Limited
SMP – Scientific Monitoring Plan/Program
SoW – Scope of Works
WMS – Work Method Statement

Appendix Q: Scientific Monitoring Capability

Scientific Monitoring Assurance and Capability Assessment

Assurance arrangements

Astron Environmental Services (Astron) is currently Santos' primary Monitoring Service Provider for the implementation of SMPs 1-12. A contractual arrangement exists with Astron to maintain standby arrangements as per the Oil Spill Scientific Monitoring Standby and Response Manual (EA-00-RI-10162) and have the resourcing capability to implement a first-strike response at all times. Astron maintains a relationship with a primary sub-contractor (BMT) for the provision of scientific monitoring for those SMPs where Astron does not have the required capability. Between Astron and BMT, capability exists to deliver first strike resourcing against SMPs 1-11 and SMP 12 will be conducted by capability obtained through the Australian Institute of Marine Science (AIMS).

Assurance on the continued maintenance of capability is provided through the delivery of monthly capability reports. These reports are generated by the Astron and BMT Planning and Logistics Officers and delivered to the Santos Spill Response Adviser along with a summary of any changes in resourcing or, and if required, how gaps in resourcing have been managed. Since the establishment of the scientific monitoring contract in 2015 Astron has always demonstrated through this process that it has the required capability to meet first strike resourcing as per the standby services contract.

Santos ensures that Astron/BMT standby arrangements are adequate through its exercise and auditing program. Santos regularly conducts exercises and tests with Astron and BMT to ensure that Santos IMT roles and Astron/BMT monitoring roles are familiar with the SMP activation arrangements while providing spot checks on resource availability. Santos has previously also undertaken an audit of Astron against its Oil Spill Scientific Monitoring Standby and Response Manual (EA-00-RI-10162). Assurance activities to date have demonstrated a high degree of compliance with standby service requirements.

Continuous improvement

Santos is committed to further improving its oil spill scientific monitoring capability. To that end, Santos is participating in a Joint Industry Operational and Scientific Monitoring Plans project, governed through an APPEA-Industry Steering Committee. This project, being progressed throughout 2021, is working towards a joint-industry capability for implementing a common suite of oil spill operational and scientific monitoring plans. The project aims to deliver efficiencies in implementing and testing oil spill scientific monitoring arrangements while increasing the level of resourcing and capability available to participating companies.

Baseline Data and Capability Assessment

Santos has identified suitable sources/ methods to obtain information through its baseline data review and in the development of Scientific Monitoring Plans (SMPs) for all environmental sensitivities. The SMPs outline the methods that would be used to collect information from key receptors that are potentially impacted by Santos activities (e.g. oil spill incidents).

Santos is committed to undertaking a review of the status, availability, currency and suitability of existing baseline data for oil spill scientific monitoring sources every 2 years. The latest review was undertaken in 2021 by Astron (Baseline Data Review document SO-91-RF-20022) and looked at all high biodiversity value receptors in the Santos EMBA. Following this an additional assessment was undertaken in September 2019 (DC-40-RI-20017) to determine whether existing baseline data is sufficient and accessible for sensitive receptors that could be impacted from worst case Commonwealth waters spills scenarios associated with operational activities at or around Devil Creek pipeline/Reindeer platform, Varanus Island and Ningaloo Vision facilities. For the initial submission of the Bedout well drilling campaign submitted to NOPSEMA, Astron conducted a baseline review concentrating on sensitive receptor areas with minimum hydrocarbon contact times of less than seven days and as described in *Oil Spill Scientific Monitoring – Baseline Data Review Part 1 - Priority Protection Area Update, February 2021 Doc No. SO-91-RI-20114*. This initial submission has been followed by NOPSEMA issuing a Request for Further Written Information (RFFWI). In order to address the RFFWI, Santos has re-modelled the LOWC scenario and the stochastic modelling indicates a smaller number of sensitive areas are likely to be contacted within seven days compared to the initial submission. These receptors include Bedout Island, Eighty

Mile Beach, Eighty Mile Beach AMP, Port Hedland-Eighty Mile Beach, and Karratha-Port Hedland. Bedout Island and Eighty Mile Beach were included in the baseline assessment for the initial Bedout well campaign submission. A baseline assessment for those not included in the initial submission (Eighty Mile Beach-AMP, Port Hedland-Eighty Mile Beach, and Karratha-Port Hedland) is currently underway and will be complete before the Activity commences.

The assessment of baseline data included:

1. A review of the following parameters for each program identified:
    - Integrated Marine and Coastal Regionalisation of Australia
    - Custodian- contact point for data
    - Spatial extent
    - Variables available for monitoring
    - Methods applied to monitoring
    - Year of most recent data capture
    - Total duration of monitoring program
    - Data completeness (number of years monitored as proportion of program duration)
    - How often data is captured
    - Appropriateness of variables (Judgement as to whether variables are appropriate for future oil spill monitoring)
    - Is there any clear indication that the monitoring will continue?

2. The quality of the following parameters was then ranked as high, medium, low or unknown:
    I. Year of most recent capture:
        - 2015-2018 (if a single data capture has occurred in the last two years, then the overall program can be considered of high quality) = high
        - 2009-2014 = medium
        - <2009 = low

    II. Duration:
        - >4 years = high
        - 2-4 years = medium
        - 1 year = low

    III. Data completeness:
        - 100% = high
        - 75-99% = medium
        - <75% = low

    IV. Frequency of capture
        - Annually = high
        - Bi-annually = medium
        - <Bi-annually = low

    V. Appropriateness of parameters
        - High/medium/low

        Appropriateness of parameters was based on reference to the Scientific Monitoring Plan's targeted states for each receptor and considering whether the monitoring parameters were sufficient to compare against these states. Parameters were considered highly appropriate if all targeted states for a receptor could be quantified, of medium appropriateness if only some states could be quantified and low if the monitored parameters had little relevance to the targeted states of an individual receptor.

3. An overall assessment of each study program was then made as follows:
    - All parameters rated high = overall 'good'
    - At least one parameter rated medium = overall 'fair'

- At least one parameter rated low = overall ‘poor’
- Unknown = overall not enough data to rate

The above assessment process was also performed across monitoring programs which specified at least one of the priority protection areas within their monitoring sites. For Priority protection areas, the above assessment was then used to determine if 1) the baseline data available could be used to detect change in the state in the event of a significant impact - Classified as “good” in the above assessment (i.e., data was current, of reasonable duration and frequency, and employed appropriate methodologies) or 2) the existing baseline data is unlikely to be suitable to detect change in state – classified as “fair” or “poor” by the above assessment (i.e., the data was dated, infrequent, of limited duration and/or relied on inappropriate methodologies). Following this assessment, a Protection Priority Area by SMP matrix summarising recommendations on baseline data status and recommendations for further action was developed (**Table Q-1**) based on three categories:

- Not applicable – SMP is not applicable to the priority protection area as sensitive receptor does not occur.
- Survey - current monitoring/knowledge is considered sufficient (i.e., could be used to detect change in state in the event of a significant impact) and is considered a lower priority for post-spill pre-impact data collection.
- Priority survey – current monitoring is not in place or not practicable; post-spill pre-impact baseline data collection should be prioritised.

This assessment was applied to Bedout Island and Eighty Mile Beach for which a baseline assessment has been undertaken with survey recommendations displayed in Table 1. For the sensitive receptors currently undergoing a baseline assessment (Eighty Mile Beach-AMP, Port Hedland-Eighty Mile Beach, and Karratha-Port Hedland) a precautionary approach was taken and ‘Priority survey’ recommended unless the assessor was aware of sufficient current monitoring/knowledge (refer to **Table Q-1**)

The assessment determined for the majority of sensitive receptors within the priority protection areas specific post-spill pre-impact monitoring should be prioritised. Specifically, for Bedout Island, a review of the operational and scientific monitoring (OSM) baseline data by Santos in 2021 (Santos Oil Spill Scientific Monitoring Baseline Data Review SO-91-RF-200022) showed that recent surveys (2016 and 2017) conducted at Bedout Island by DBCA are rated as being of fair quality (in the context of application for OSM purposes). The outcome of the review also showed a recent marine reptile (turtle) monitoring study published for Bedout Island that is rated as fair quality, and two recent studies on the abundance and health of seabirds/ shorebirds, both rated as fair quality. This data is referenced in the SMPs. The SMPs are reviewed annually and compared against all matters of national environmental significance (MNES) within an area which includes Bedout Island to ensure that the methods are suitable for all key receptors, including threatened species and their habitats. In the event that new or additional OSM baseline data becomes available, identified during the regular reviews, it will be included in updates as part of the OSM and SMP reviews.

Based on the assessment of priority survey areas/receptors outlined in **Table Q-1** a capability assessment was undertaken to understand whether existing scientific monitoring capability would be sufficient to mount a first-strike monitoring program to gather baseline data within a short-timeframe (<7 days), noting that in the event of very short contact timeframes mobilisation of scientific monitoring teams to priority receptor sites may not be possible within contact timeframes and experimental designs not relying on pre-impact baseline would have to be employed.

In the unlikely event of shoreline contact in less than 72 hours, alternative approaches exist for detecting impacts where it is not feasible to conduct first-strike pre-impact baseline surveys prior to shoreline contact, for example, impact sites versus multiple control sites and/or a gradient approach. Pre-impact baseline information can also be strengthened by using retrospective remote sensing data for the quantification of baseline conditions to feed into post-spill monitoring designs for interpretation of environmental impact and ecosystem recovery. These experimental approaches are outlined in the Santos Oil Spill Scientific Monitoring Plan (EA-00-RI-10099) and are selected as appropriate to the receptor type.

Table Q-2 outlines the required scientific monitoring capability for rapid response. When determining actual team capability, personnel were only allocated to a single SMP team, unless otherwise stated. It should be noted that given the list of Protection Priority areas is based on stochastic modelling data, it is unlikely that all of these receptors would be contacted within 7 days and hence there is likely to be some redundancy. Further, once the baseline review is complete for Eighty Mile Beach-AMP, Port Hedland-Eighty Mile Beach, and Karratha-Port Hedland, it may be determined that less priority surveys maybe required then currently listed in **Table Q-1.**

The results of the Baseline Data Review document (SO-91-RF-20022and subsequent baseline and capability assessment of protection priority areas summarised herein (but detailed further in DC-40-RI-20017 and SO-91-RI-20114) has been provided within the Environment Functional Team Folder on the Emergency Response Intranet page (with further updates pending the completion of the baseline review) so that this information is accessible to guide Santos IMT Environmental roles and monitoring provider roles in the event of activating oil spill scientific monitoring.

Table Q-1: Summary of recommendations for further action based on review of available baseline data

SMP	Priority Protection Areas				
	Karratha-Port Hedland	Port Hedland-Eighty Mile Beach	Bedout Island	Eighty Mile Beach	Eighty Mile Beach AMP
Water Quality (SMP1)	Priority survey	Priority survey	Priority survey	Survey	Priority survey
Sediment Quality (SMP2)	Priority survey	Priority survey	Priority survey	Survey	Priority survey
Sandy Beaches/Rocky Shorelines (SMP3)	Priority survey	Priority survey	Priority survey	Survey	Not applicable
Mangroves (SMP4)	Survey	Survey	Not applicable	Survey	Not applicable
Intertidal Mudflats (SMP5)	Priority survey	Priority survey	Priority survey	Survey	Not applicable
Benthic Habitats (SMP6)	Priority survey	Priority survey	Priority survey	Survey	Priority survey
Seabirds/ shorebirds (SMP7)	Priority survey	Priority survey	Priority survey	Survey	Priority survey
Marine megafauna (SMP8)	Priority survey	Priority survey	Survey	Survey	Priority survey
Marine reptiles (SMP9)	Priority survey	Survey	Priority survey	Priority survey	Priority survey
Seafood Quality (SMP10)	Priority survey	Priority survey	Priority Survey	Priority Survey	Priority Survey
Fish, Fisheries & Aquaculture (SMP11)	Priority survey	Priority survey	Priority Survey	Priority Survey	Priority Survey
Whale sharks (SMP12)	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

Table Q-2: Capability assessment for rapid sampling of Bedout Island, Eighty Mile beach, Port Hedland Eighty Mile Beach and Karratha-Port Hedland areas within seven days

<table>
<tr><th rowspan="2">Receptors</th><th></th><th colspan="4">Required capability for rapid response (per Priority Protection Area)</th><th rowspan="2" colspan="2">Actual Team Capability</th></tr>
<tr><th>Bedout Island</th><th>Eighty Mile Beach -AMP</th><th>Eighty Mile Beach</th><th>Port Hedland Eighty Mile Beach</th><th>Karratha-Port Hedland</th></tr>
<tr><td>Water Quality (SMP1)</td><td rowspan="2" colspan="2">1 team of 3 personnel
-experienced at water quality sampling
-scientist with experience in deep sea sediment sampling
scientist with infauna identification capacity</td><td>Rapid priority response not required</td><td rowspan="2" colspan="2">1 team of 3 personnel
-experienced at water quality sampling
scientist with experience in deep sea sediment sampling
scientist with infauna identification capacity</td><td rowspan="2">2 teams of 3 available</td><td rowspan="2">6 potential field team members all with water sampling experience and vessel-based sediment sampling experience (3 FTLs, 2 TMs and 1 FS), 1 office-based TA and 3 office support</td></tr>
<tr><td>Sediment Quality (SMP2)</td><td>Rapid priority response not required</td></tr>
<tr><td>Sandy Beaches/Rocky Shorelines (SMP3)</td><td rowspan="2" colspan="2">1 team of 3 personnel
experienced at benthic habitat and marine macrofauna surveying</td><td>Rapid priority response not required</td><td rowspan="2" colspan="2">1 team of 3 personnel
experienced at benthic habitat and marine macrofauna surveying</td><td rowspan="2">2 teams of 3 available</td><td rowspan="2">6 potential field team members all with shoreline assessment experience (3 FTLs and 2 TMs and 1 FS), 1 office-based TA and 3 office support</td></tr>
<tr><td>Intertidal Mudflats (SMP5)</td><td>Rapid priority response not required</td></tr>
</table>

Receptors	Required capability for rapid response (per Priority Protection Area)					Actual Team Capability	
	Bedout Island	Eighty Mile Beach -AMP	Eighty Mile Beach	Port Hedland Eighty Mile Beach	Karratha-Port Hedland		
Mangroves (SMP4)	Not applicable	Rapid priority response not required [3]	Rapid priority response not required [3]	Rapid priority response not required [3]	Rapid priority response not required [3]	Not required	-
Benthic Habitats (SMP6)	1 team of 2 personnel - senior marine scientist with experience in benthic habitat assessment - divers or ROV operators		Rapid priority response not required	1 team of 2 personnel - senior marine scientist with experience in benthic habitat assessment - divers or ROV operators		2 teams of 2 available	4 potential field team members all with benthic habitat assessment experience (2 FTLs [1 is ADAS diver], 1 TM [with ROV operator experience] and 1 FS), 1 office-based TA and 3 office support
Seabirds/ shorebirds (SMP7)	1 team of 2 personnel[2] at least one member of each team is an experienced ornithologist	1 team of 2 personnel[2] at least one member of each team is an experienced ornithologist	Rapid priority response not required	1 team of 2 personnel[2] at least one member of each team is an experienced ornithologist	1 team of 2 personnel[2] at least one member of each team is an experienced ornithologist	4 teams of 2 available	11 potential field team members (4 FTLs (experienced ornithologists), 5 Moderate Experience, 2 Low Experience)

<table>
<tr><th rowspan="2">Receptors</th><th colspan="5">Required capability for rapid response (per Priority Protection Area)</th><th colspan="2" rowspan="2">Actual Team Capability</th></tr>
<tr><th>Bedout Island</th><th>Eighty Mile Beach -AMP</th><th>Eighty Mile Beach</th><th>Port Hedland Eighty Mile Beach</th><th>Karratha-Port Hedland</th></tr>
<tr><td>Marine megafauna (SMP8)</td><td>Rapid priority response not required</td><td>1 team of 2 personnel (aerial)[1,4]
1 team of 2 personnel (vessel)[1,5]</td><td>Rapid priority response not required</td><td colspan="2">1 team of 2 personnel (aerial) [1,4]
1 team of 2 personnel (vessel) [1,5]</td><td>2 aerial survey teams of 2 available[1,4]
2 vessel-based survey teams of 2 available[1,5]</td><td>9 potential field team members (7 FTLs (experienced wildlife observers), 2 Relevant Experience)</td></tr>
<tr><td rowspan="2">Marine reptiles (SMP9)</td><td colspan="5">2 teams of 2 personnel (aerial)[1, 4]
experienced wildlife observers</td><td rowspan="2">2 aerial survey teams of 2 available[1]
3 vessel-based survey teams of 2 available[1]
3 ground-based teams of 2 available[2]</td><td rowspan="2">14 potential field team members (10 FTLs (7 experienced wildlife observers and 3 turtle survey experience), 5 Relevant Experience)</td></tr>
<tr><td>1 team of 2 available (vessel)[1,5]
both experienced wildlife observers
1 team of 2 personnel (ground-based)[2]
at least one member with experience in turtle survey techniques</td><td colspan="2">1 team of 2 available (vessel)[1,5]
both experienced wildlife observers
1 team of 2 personnel (ground-based) [2]
at least one member with experience in turtle survey techniques</td><td colspan="2">1 team of 2 available (vessel)[1,5]
both experienced wildlife observers
1 team of 2 personnel (ground-based) [2]
at least one member with experience in turtle survey techniques</td></tr>
</table>

Receptors	Required capability for rapid response (per Priority Protection Area)					Actual Team Capability	
	Bedout Island	Eighty Mile Beach -AMP	Eighty Mile Beach	Port Hedland Eighty Mile Beach	Karratha-Port Hedland		
Seafood Quality (SMP10)	1 team of 3 personnel • marine scientist with ROV/BRUV operation experience. • experienced fish identification and necropsy	1 team of 3 personnel • marine scientist with ROV/BRUV operation experience. • experienced fish identification and necropsy		1 team of 3 personnel • marine scientist with ROV/BRUV operation experience. experienced fish identification and necropsy		3 teams of 3 available	9 potential field team members with fish identification and necropsy experience and/or BRUV experience (3 FTLs, 4 TMs and 2 FS), 1 office-based TA and 3 office support
Fish, Fisheries & Aquaculture (SMP11)							
Whale sharks (SMP12)	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not required	-

[1]Aerial and vessel surveys could be conducted by the same team. The aerial-based surveys would be conducted first and then this would help inform target areas for vessel-based surveys.

[2]Grounds based surveys for shorebirds/seabirds and marine reptiles could be conducted concurrently by one survey team per location.

[3]Remote sensing data would be collected for mangroves, with no field team required to be mobilised

[4]Aerial surveys for marine mammals and reptiles could be conducted by the same team, provided they have the appropriate skills and targeting the applicable areas for the target species

[5]Vessel-based surveys for marine mammals and reptiles could be conducted by the same team per location, provided they have the appropriate skills and targeting the applicable areas for the target species.

Appendix R: Forward Operations Guidance

Forward Operating Base (FOB)

For a significant Level 2/3 response requiring coordination of resources to be deployed to the field, Santos will establish an FOB. For a level 2/3 spill crossing from Commonwealth to State waters (cross-jurisdictional spills) DoT will establish an FOB.

For a Bedout Multi-Well Drilling activity spill response, Santos will establish an FOB at the Santos Dampier facilities leased from Toll Energy. These facilities are located in Toll Energy's Yard 1 and Yard 2 on Streckfuus Road Dampier; the facilities consist of a conference room and multiple offices that could be used as break-out rooms. The Toll Energy Dampier facilities are connected to the Santos internet and telephone system. These facilities are also available to the DoT to establish an FOB for State based response.

Additional FOBs may be set up as operational requirements dictate. Based on shoreline areas that might be impacted, potential additional FOB locations include Port Hedland, Broome and Exmouth. **Table R-1** to **Table R-4** list local facilities with operational value for response in Port Hedland, Broome, Exmouth and Dampier respectively.

The IMT will develop a communication strategy to support the FOB/s and forward staging areas.

Table R-1: Port Hedland facilities with operational values for response

Facility	Owner/Operator	Potential Uses
Port of Port Hedland	Pilbara Ports Authority	Staging area for vessel loading for spill response and equipment and waste management Storage of oil spill response equipment Vessel loading for spill response equipment and waste management Office facilities for Marine-based Command Centre
Port Hedland International Airport	Australian Government	Air freight spill response equipment. Storage sheds for oil spill response equipment Office facilities for Aviation-based Command Centre
The Esplanade Hospitality Inn Ibis Styles Cooke Point Holiday Park Kings at the Landing The Lodge Motel South Hedland Motel Others	Various (independent)	Spill responders and IMT accommodation Accommodation and messing for clean-up crew
Toll Ipec Freight Transport	Toll	Transfer yard for truck-based equipment deliveries and waste management, Boom Maintenance and Cleaning Facility Materials consolidation Marine equipment storage, staging and repairs Oiled wildlife response centre Laydown/storage area Bunded washing facility
Go Marine Group Offices	Go Marine	FOB OCC Offices

Table R-2: Broome facilities with operational values for response

Facility	Owner/Operator	Potential Uses
Port of Broome	Kimberley Ports Authority	Staging area for vessel loading for spill response and equipment and waste management Storage of oil spill response equipment Vessel loading for spill response equipment and waste management Office facilities for Marine-based Command Centre
Broome International Airport	Australian Government	Air freight spill response equipment Storage sheds for oil spill response equipment Office facilities for Aviation-based Command Centre
Broome Heliport	Australian Government	Air freight spill response equipment Storage sheds for oil spill response equipment Office facilities for Aviation-based Command Centre
Seashells Broome Moonlight Bay Suites Bayside Holiday Apartments Mangrove Hotel Blue Seas Resort Others	Various (independent)	Spill responders and IMT accommodation Accommodation and messing for clean-up personnel
Toll Mermaid Supply Base 1 Toll Mermaid Supply Base 2	Toll and Mermaid	FOB OCC Office Transfer yard for truck-based equipment deliveries and waste management, Broome Maintenance and Cleaning Facility Materials consolidation Marine equipment storage, staging and repairs Oiled wildlife response centre Laydown / storage area Bunded washing facility for oil booms
Civmec Logistics Supply Base	Civmec	Transfer yard for truck-based equipment deliveries and waste management, Boom maintenance and Cleaning Facility Materials consolidation Marine equipment storage, staging and repairs Oiled wildlife response centre Laydown / storage area Bunded washing facility for oil booms
Quest Marine Services	QMS	Marine-based response Command Centre and Staging Area
Toll offices	Toll	FOB OCC Offices
Local boat ramp at Broome Town Jetty	Broome Council	Load out for near-shore marine based operations Boat launching

Table R-3: Exmouth facilities with operational values for response

Facility	Owner/Operator	Potential Uses
Harold E. Holt Naval Base	Australian Government Department of Defence	Forward Operations Base Storage of oil spill response equipment Vessel loading for spill response equipment and waste management
Exmouth Marina	Shire of Exmouth	Staging area for vessel loading for spill response equipment and waste management
Learmonth Airport	Australian Government Department of Defence	Air freight spill response equipment.
Exmouth light airstrip	Exmouth council	Air freight spill response equipment. Dispersant operations base
Logistic Services Yard	Exmouth Freight Services	Transfer yard for truck-based equipment deliveries and waste management, Boom Maintenance and Cleaning Facility Response equipment storage
Tantabiddi/Bundegi Boat Ramp areas	Shire of Exmouth	Staging/storage area Load out for near-shore marine based operations Boat launching
Bhagwan/Jetwave/Base Marine Yards Exmouth	Exmouth	Storage/Laydown and Staging Area Materials consolidation Marine equipment storage, staging & repairs

Table R-4: Dampier facilities with operational values for response

Facility	Owner/Operator	Potential Uses
Dampier Cargo Wharf	Pilbara Ports Authority	Staging area for vessel loading for spill response equipment and waste management Storage of oil spill response equipment Vessel loading for spill response equipment and waste management Office facilities for Marine-based Command Centre
Toll Dampier Supply Base	Toll Energy Logistics Pty Ltd	Staging area for vessel loading for spill response equipment and waste management
Karratha Airport	Australian Government Department of Defence	Air freight spill response equipment
Devil Creek accommodation	Santos /Sodexo	Spill responders and IMT accommodation

Searipple Village	Searipple Karratha	Accommodation & messing for clean-up crew
Toll Energy Yard	Toll Energy Logistics Pty Ltd	Transfer yard for truck-based equipment deliveries and waste management, Boom Maintenance and Cleaning Facility Materials consolidation Marine equipment storage, staging & repairs Oiled wildlife response centre Laydown / storage area Bunded washing facility for oil booms
Local boat ramp at Dampier Yacht Club	Leased to Dampier Yacht Club	Load out for near-shore marine based operations Boat launching

Forward Staging Areas

Staging areas for shoreline operations will be set up at shoreline response locations under the direction of the DoT as the Control Agency for shoreline response activities. Wildlife treatment facilities may also be set-up under the direction of DoT and DBCA to clean and rehabilitate oiled wildlife.

Transport

Transportation on shoreline locations will be supported by 4x4 vehicles and all-terrain vehicles. These can be supplied by locally and nationally through hire/purchase 3rd parties.

Mobile plant

Mobile plant and equipment for mechanical clean-up can be provided from suppliers in Dampier, Port Hedland, Broome, Exmouth, Karratha or Perth as required.

Decontamination

Decontamination areas (HDPE lining provided through the provider of PPE) will be constructed for maintaining the integrity of the 'Zones' at shoreline Staging Areas, location and terrain permitting and as directed by the DoT as Control Agency for the shoreline response. Contaminated water from the decontamination areas will be regularly pumped out. All contaminated wastewater will be decanted into suitable transportable medium provided by Santos' WSP for removal.

Ablutions

Staging Areas may be supported by toilet / ablution solutions; these solutions will be dictated by the location and terrain of the clean-up operations. Available facilities include:

+ Portable Toilets;
+ Trailer Mounted Toilets; and
+ Transportable Toilets.

These solutions are chemical and fresh water based and supported by weekly / fortnightly flushing servicing. The requirement of the situation will dictate if this service is supplied out of Karratha or Perth. Santos' WSP can provide disposal as required of wastewater from ablutions.

Security

To ensure that Staging Areas are secure, Santos can provide temporary fencing to contain operations / equipment during the clean-up; suppliers of temporary fencing are available in Karratha, Dampier, Port Hedland and Broome, or larger quantities may need to be sourced from Perth. If required, specialist service providers will be engaged.

Messing

Messing and catering facilities can be provided through one of Santos' current service providers, under local arrangements as determined by capacity and facilities geographically available.

Freight movement

The transportation of all equipment and service from all stockpiles and centres can be facilitated through Santos' third-party logistics providers.

Cleaning and repair

Cleaning and repair of booms and other operational equipment this can be carried out in bunded areas at the forward staging area or supply base facilities.

Suppliers

All material, associated equipment and services will be sourced, where possible, through existing Santos suppliers. Service Orders will be raised if other/new suppliers are to be engaged to provide services etc. in the event of an oil spill.

Accommodation

There are four key components to the clean-up operations: marine, aviation, land and emergency response team. Accommodation options for field responders and FOB personnel will be dictated by proximity to their respective activity areas, to ensure maximum utilisation of the shift time available.

Mainland accommodation is available at Dampier/ Karratha, Onslow and Exmouth. Santos' Devil Creek accommodation close to Karratha may also be used.

Where possible local facilities will be utilised to accommodate response personnel, however transportable accommodation and messing facilities can be supplied through contract suppliers if required.

Transportation to respective work sites would be facilitated via modal and multimodal transport solutions, dictated by the geographical constraints of each site. Under current contractual arrangements, Santos has access to transportation providers for Land, Air and Marine operations. In general, from accommodation locations to operational areas transport would be via road using the services of our third-party supplier. Should additional services be required to meet the demand, this would be engaged under a Service Agreement as determined and authorised by the IMT.

Providoring

Providoring arrangements, when utilising local facilities would be covered under Service Orders / Purchase Order Terms and Conditions, however if required Santos has existing contracts with local who could be used for additional providoring support. These supplies would be transported to the respective spill response staging area by one of Santos' third-party logistics providers.

The providoring requirements for transportable and remote messing would be provided directly through Sodexo and BRT respectively, including the transportation thereof.

Personal protective equipment (PPE)

Santos would utilise the services of specialist providers of PPE for clean-up operations. All PPE would be sourced in Perth and transported by one of QE's third-party logistics providers to the forward operating centres.

In the event of a spill incident Santos would engage the services of a third party to provide and maintain inventory for the duration of oil spill operations.

The disposal of contaminated PPE is provided by Santos' WSP.

PPE requirements for spill responders is detailed in the Santos Oil Spill Response HSE Management Manual (SO-91-RF-10016).

Radio communications

Santos would utilise the services of a specialist communication provider to hire hand-held and vehicle mounted UHF radios to support response and clean-up personnel. Portable deployed repeater stations (battery or mains powered) can be positioned along the shoreline to provide a 'voting' system for transmitting and receiving during the clean-up operation. Communication equipment will be supplied through local, national, and international suppliers as the operational situation dictates.

For Exmouth region response operations Santos would request the use of Woodsides radio communication trailers based in Perth. These trailers are licenced for locations in Exmouth and along the Ningaloo coast and permit land, sea and air radio communications.

Appendix S: Dispersant Supply and Logistics Plan Summaries

Table S-1: Dispersant supply and logistics plan summary for SDA

Day/ Week	Flow rate m^3/day	Volume remaining after 24 hours*	Dispersant required for aerial application at 1:25 oil:dispersant m^3	Arrival of dispersant in Port Hedland m^3	Aerial application (FWADC and OSRL Hercules) m^3	Vessel application m^3	Total predicted dispersant application m^3/day	Dispersant balance on hand m^3
Day 1	23,181	4,636	185	40	0	10	10	30
Day 2	23,181	4,636	185	75	30	20	50	55
Day 3	23,181	4,636	185	285	60	50	110	230
Day 4	23,181	4,636	185	20	90	80	170	80
Day 5	23,181	4,636	185	157	115	70	185	52
Day 6	23,181	4,636	185	165	115	70	185	32
Day 7	23,181	4,636	185	499	115	70	185	346
Day 8	22,851	4,570	183	179	130	60	190	335
Day 9	22,851	4,570	183	178	130	60	190	323
Day 10	22,851	4,570	183	178	130	60	190	311
Day 11	22,851	4,570	183	178	130	60	190	299
Day 12	22,851	4,570	183	178	130	60	190	287
Day 13	22,851	4,570	183	178	130	60	190	275
Day 14	22,851	4,570	183	178	130	60	190	263
Day 15	22,662	4,532	181	178	145	40	185	256
Day 16	22,662	4,532	181	178	145	40	185	249
Day 17	22,662	4,532	181	178	145	40	185	242
Day 18	22,662	4,532	181	178	145	40	185	235
Day 19	22,662	4,532	181	178	145	40	185	228
Day 20	22,662	4,532	181	178	145	40	185	221
Day 21	22,662	4,532	181	178	145	40	185	214
Day 22	22,526	4,505	180	178	145	40	185	207
Day 23	22,526	4,505	180	178	145	40	185	200
Day 24	22,526	4,505	180	188	145	40	185	203
Day 25	22,526	4,505	180	178	145	40	185	196
Day 26	22,526	4,505	180	178	145	40	185	189
Day 27	22,526	4,505	180	179	145	40	185	183
Day 28	22,526	4,505	180	179	145	40	185	177
Day 29	22,419	4,484	179	178	145	40	185	170
Day 30	22,419	4,484	179	178	145	40	185	163

Day/ Week	Flow rate m^3/day	Volume remaining after 24 hours*	Dispersant required for aerial application at 1:25 oil:dispersant m^3	Arrival of dispersant in Port Hedland m^3	Aerial application (FWADC and OSRL Hercules) m^3	Vessel application m^3	Total predicted dispersant application m^3/day	Dispersant balance on hand m^3
Day 31	22,419	4,484	179	178	145	40	185	156
Day 32	22,419	4,484	179	178	145	40	185	149
Day 33	22,419	4,484	179	179	145	40	185	143
Day 34	22,419	4,484	179	179	145	40	185	137
Day 35	22,419	4,484	179	179	145	40	185	131
Week 6†	22,331	4,466	179 x 7 = 1,253	Access to manufactured dispersant will meet the remaining dispersant delivery requirements until week 11. A total of 7, 630 m^3 of dispersant will be required to be manufactured, with initial arrival on site required by day 36.				
Week 7	22,256	4,451	178 x 7 = 1,246					
Week 8	22,190	4,438	178 x 7 = 1,246					
Week 9	22,131	4,426	177 x 7 = 1,239					
Week 10	22,077	4,415	177 x 7 = 1,239					
Week 11	22,028	4,406	176 x 7 = 1,232					

*: following 60% volatilisation and 20% submersion after 24 hours @5m/s wind condition.

†: Manufactured dispersant required on day 36.

Table S-2: Dispersant supply and logistics plan summary for SSDI

Day/ Week	Flow rate m³	Required SFRT dispersant delivery rate m³/day	Arrival of dispersant on site m³	Dispersant balance on hand m³
Day 1	23453	0	0	0
Day 2	23453	0	0	0
Day 3	23453	0	0	0
Day 4	23453	0	40	40
Day 5	23453	0	20	60
Day 6	23453	0	20	80
Day 7	23453	0	20	100
Day 8	23,115	0	45	145
Day 9*	23,115	158	265	252
Day 10	23,115	158	250	344
Day 11	23,115	158	75	261
Day 12	23,115	158	372	475
Day 13	23,115	158	200	517
Day 14	23,115	158	189	548
Day 15**	22,921	229	250	569
Day 16	22,921	229	250	590
Day 17	22,921	229	250	610
Day 18	22,921	229	200	581
Day 19	22,921	229	250	602
Day 20	22,921	229	250	623
Day 21	22,921	229	350	744
Day 22	22,782	228	200	716
Day 23	22,782	228	250	738
Day 24	22,782	228	250	760
Day 25	22,782	228	250	782
Day 26	22,782	228	250	804
Day 27	22,782	228	250	827
Day 28	22,782	228	250	849
Day 29	22,673	227	250	872
Day 30	22,673	227	250	895
Day 31	22,673	227	250	919
Day 32	22,673	227	250	942
Day 33	22,673	227	250	965
Day 34	22,673	227	250	988
Day 35	22,673	227	125	887
Day 36	22,582	226	125	786
Day 37	22,582	226	125	685
Day 38	22,582	226	125	584
Day 39	22,582	226	0	358
Day 40	22,582	226	0	133
Day 41†	22,582	226	100	7

			Access to manufactured dispersant will meet the remaining dispersant delivery requirements until week 11. A total of 8,831 m^3 of dispersant will be required to be manufactured, with initial arrival on site required by day 39.
Day 42	22,582	226	
Day 43	22,505	225	
Day 44	22,505	225	
Day 45	22,505	225	
Day 46	22,505	225	
Day 47	22,505	225	
Day 48	22,505	225	
Day 49	22,505	225	
Day 50	22,437	224	
Day 51	22,437	224	
Day 52	22,437	224	
Day 53	22,437	224	
Day 54	22,437	224	
Day 55	22,437	224	
Day 56	22,437	224	
Day 57	22,376	224	
Day 58	22,376	224	
Day 59	22,376	224	
Day 60	22,376	224	
Day 61	22,376	224	
Day 62	22,376	224	
Day 63	22,376	224	
Day 64	22,320	223	
Day 65	22,320	223	
Day 66	22,320	223	
Day 67	22,320	223	
Day 68	22,320	223	
Day 69	22,320	223	
Day 70	22,320	223	
Day 71	22,269	223	
Day 72	22,269	223	
Day 73	22,269	223	
Day 74	22,269	223	
Day 75	22,269	223	
Day 76	22,269	223	
Day 77	22,269	223	

*: AMOSC SSDI package begins operations, limited to delivery rate of 110 L/min (158 m^3/day).

**: WWC SSDI begins operations, both SSDI packages adjusted to deliver required 1:100 dosage.

†: Manufactured dispersant required on day 41 and will meet the remaining dispersant delivery requirements until day 43. A total of 8,831 m^3 of dispersant will be required to be manufactured.

Appendix T: Cumulative Response Capability Assessment

Response Capability Assessment

Table T-1 below shows the total cumulative worst-case response needs for the Bedout multi well drilling campaign. The table assesses the cumulative requirement for personnel based on a LOWC incident for the Bedout Multi Well activity against the Santos resource capability. It must be noted that during a real event, the resourcing may be different to below based on operational NEBA. This is for assessment purposes, to ensure adequate resources are available for response strategy implementation.

Tables T-2 to **T-4** provide additional detail on personnel requirements for Surface Dispersant Application.

Table T-5 provides additional detail on availability of trained field responders during initial and peak response periods. These personnel are utilised across multiple response strategies and are sourced from various Australian and international OSRO's. The table notes that Australian personnel are available from week one, as contracted. International personnel are noted to be available from week three, to allow for delays due to pandemic entry requirements. Numbers of trained response personnel available during peak periods are planned to be equal to or greater than the peak response requirement.

Table T-5 also includes field personnel that are trained through a Just-In-Time training program. These personnel shall be identified in the first week of the response, then trained in the second and third week of the response, to be available by week four.

Training could be immediately implemented for groups of personnel for the following response strategies; shoreline clean-up assessment and shoreline clean-up. These response strategies are predicted to be the most resource intensive for a response to a Bedout worst-case spill, but also have the longest timeframe between the spill occurring and when personnel requirements peak (e.g. as shown in **Table 10-40**, only four shoreline clean-up assessment teams are required in week one and the peak demand is between weeks nine to eleven when 48 teams are required; shoreline clean-up demand peaks in week eight at 40 teams, as shown in **Table 15-6**). Team leaders for these response strategies typically require less field experience than other response strategies.

It will be evaluated during the response whether Just-In-Time training programs will also be implemented for protection and deflection team leader and vessel-based dispersant supervisor roles. This will depend on whether trainees with the required prior skill sets, such as maritime experience, are accessible. Trainees will be primarily sourced from Australian maritime industry personnel. Just-In-Time training for containment and recovery team leaders is not advisable, due to the potential complexity of containment and recovery operations, including multiple vessels in close proximity, towing equipment under tension and variable weather conditions in the open ocean.

Training will be provided using a combination of online and practical training by training providers including OSRL and Response Resource Management (RRM). Training is likely to be an ongoing feature of the response, depending on the skill requirements of the most effective response techniques.

The personnel numbers in **Table T-1** represent the operational requirements. Additionally, to cover shift arrangements to manage responder fatigue, it is assumed the number of personnel required would be approximately 50% greater. It is estimated that an additional 69 skilled field response personnel will be required to allow for shift changes across the response. Additional personnel requirements will be met through existing arrangements, including case-by-case approvals with OSROs. Surge capacity to cover shift changeovers during peak periods will occur well into the response (weeks six to eleven) allowing adequate time to make arrangements with OSRO's and/or complete any Just-In-Time training required to boost trained personnel numbers.

Table T-1: Response Capability Assessment

Function	Response Strategy	Bedout Peak Response Need Requirement	Providers					
			Santos	AMOSC staff	Industry Core Group	OSRL	The Response Group	Mutual Aid, Contractors and Service Providers
Source control [24]		39[25]	39	-	-	-	-	Additional personnel available from WWC and Oceaneering [26]
Monitor and Evaluate	Vessel surveillance	2 vessel crew	-	-	-	-	-	2 vessel crew
	Aerial surveillance[27]	2 aerial observers 1 flight crew	-	1	1	-	-	1 flight crew
	Tracking buoys	1 vessel crew	-	-	-	-	-	1 vessel crew
	Oil spill trajectory modelling	*Services provided with no specific personnel numbers required.*						
	Satellite imagery	*Services provided with no specific personnel numbers required.*						
	Initial oil characterisation	1 vessel crew	-	-	-	-	-	1 vessel crew (Santos contracted vessel provider)

[24] The Cumulative capability for Source Control is assessed on its own, as the resources do not impact other strategy implementation. 60 Santos source control personnel available.

[25] Inclusive of Source Control IMT personnel counted in Appendix J.

[26] WWC has confirmed availability of 34 source control personnel

[27] Based on 1 aircraft conducting 2 sorties per day.

Function	Response Strategy	Bedout Peak Response Need Requirement	Providers					
			Santos	AMOSC staff	Industry Core Group	OSRL	The Response Group	Mutual Aid, Contractors and Service Providers
	Operational water quality monitoring	1 field team 1 vessel crew	-	-	-	-		1 field teams of 3 personnel (1 Team Leader/ 2 Team Members) 1 vessel crew
	Shoreline clean-up assessment technique (SCAT)	48 Teams (1 Team Leader/ 1-2 Team Members)	4 Team Leaders	4 Team Leaders	-	26 Team Leaders	14 Team Leaders	Labour hire: 96 Up to 2,000 Team Members who can complete shoreline assessment training, working under direction of Team Leader (contracted work force hire company)
Containment and recovery		126 (21 C&R systems, each with 1 x vessel master, 1 x Supervisor, 4 x deployment crew)	-	-	21	-	-	Vessel contracted: Vessel masters and deployment crew (105)
Mechanical dispersion		*n/a – personnel as per vessel availability*	-	-	-	-	-	As per in-field vessel availability
Chemical dispersant	Surface application: Vessel systems	**35 (as per table T-2)**	-	-	8	-	-	Labour Hire: 2 Vessel contracted: 24
	Surface application: Aircraft systems	**36 (as per table T-3 and T-4)**	-	Air Attack Supervisor: 1	-	OSRL C-130: 5 ground crew and supervisor		FWAD Contract: 21 FWAD ad-hoc contracted: 4 Air Attack Helicopter: 2 OSRL C-130 aircraft contracted: 3 flight crew

Function	Response Strategy	Bedout Peak Response Need Requirement	Providers					
			Santos	AMOSC staff	Industry Core Group	OSRL	The Response Group	Mutual Aid, Contractors and Service Providers
	Subsea injection	8 + vessel contracted numbers	Santos Company Rep: 1[28]	-	-	-		Oceaneering staff (via AMOSC SFRT contract): 3 WWC SSDI staff via contract: 4 SFRT vessel through contracted vessel providers – vessel personnel as per contract.
Shoreline protection and deflection	P&D resources as per tables Table 14-4 and **Table 14-5.**	12 team leaders 12 deployment team (108 personnel) 24 (vessel crew)	-	-	3	1	8	Labour Hire: 108 Vessel personnel as per contract.
Shoreline clean-up		40 team leaders 360 team members	-	-	20	10	10	Labour Hire: 360 team members, working under direction of team leader
Oiled wildlife response		122	Sourced as per the WAOWRP arrangements (Level 6)					
Waste management		*n/a – personnel as per shoreline clean-up resourcing*	-	-	-	-	-	WSP to provide personnel under existing contract to collect and transport waste
Scientific monitoring		57[29]	-	-	-	-	-	57 from BMT/Astron
Response need (excluding Source Control)			4	6	53	42	32	
Response need including +50% for shift change.			6	9	80	63	48	

[28] From additional available numbers from source control.

[29] As per the resourcing requirements in Appendix Q

Function	Response Strategy	Bedout Peak Response Need Requirement	Providers					
			Santos	AMOSC staff	Industry Core Group	OSRL	The Response Group	Mutual Aid, Contractors and Service Providers
Total Available (excluding Source Control)			16[30]	16[31]	84[32]	80[33]	60	*Santos has either contracts in place, or can appoint ad-hoc contracts, to resource the above numbers required.*
Total Required Source Control			39	-	-	-		Additional personnel available from WWC (34) and Oceaneering
Total Source Control			60					

[30] Personnel trained in SCAT. This figure does not include Santos Core Group members.

[31] AMOSC has a permanent staff of sixteen available on a 24/7 basis (AMOSC Plan, 2021).

[32] The target number of AMOSC Core Group members is 100 (minimum 84) (AMOSC Plan 2021). This value includes the 12 Santos Core Group members.

[33] 18 trained oil spill responders guaranteed. A pool of 80 dedicated spill response specialists approved on a case-by-case basis (oilspillresponse.com, SLA).

Table T-2: Vessel dispersant application – Field resourcing requirements

Vessel dispersant resource	No. required per vessel (minimum)	No. vessels	Total no. required	Source of personnel
Support location (onshore FOB, likely to be Port Hedland)				
FOB Dispersant Lead	*n/a*	*n/a*	1	AMOSC/AMOSC Core Group
Dispersant hand			2	Labour hire
		FOB Total:	**3**	
At application site (at sea ops.)				
Vessel Master	1	8	8	Vessel contract
Supervisor	1		8	OSRL
Deckhand	2		16	Vessel contract
		At sea ops. total:	**32**	
		Total personnel:	**35**	

Table T-3: FWADC aerial dispersant application – Field resourcing requirements

Aerial dispersant resource	No. required per aircraft (minimum)	No. aircraft	Total no. required	Source of personnel
Support location (AMOSC FWADC Airbase FOB, likely to be Port Hedland International Airport)*				
FOB Commander*	*n/a*	*n/a*	1	AMOSC FWADC contract
Airbase Manager*			1	AMOSC FWADC contract
Safety Officer*			1	AMOSC FWADC contract
Dispersant Loading Crew*			2	AMOSC FWADC contract
Log/Admin*			1	AMOSC FWADC contract
		Airbase FOB total:	**6**	
AMOSC FWADC Dispersant Ops. Group (at sea ops. at application site)				
Dispersant Application Air Tractors~				
Air Tractor Pilot†	1	8	8	AMOSC FWADC contract / Ad-hoc contract~
Air Tractor First Officer†	1	8	8	AMOSC FWADC contract / Ad-hoc contract~
		Dispersant Group Total:	**16**	
Air Attack Helicopters				
Air Attack Helicopter Pilot†	1	1	1	Santos contracted
Air Attack Helicopter First Officer†	1	1	1	Santos contracted
Air Attack Supervisor*	1	1	1	AMOSC
		Dispersant Group total:	**3**	
AMOSC FWADC Observation Group				

Aerial dispersant resource	No. required per aircraft (minimum)	No. aircraft	Total no. required	Source of personnel
Aerial Surveillance Pilot†	1	1	1	AMOSC FWADC contract
Aerial Surveillance First Officer†	1	1	1	AMOSC FWADC contract
Aerial Observer*	1	1	1	AMOSC FWADC contract
		Observation Group total:	**3**	
		Total personnel:	**28**	

* These roles as per Aerotech First Response (AFR)/AMOSC/Core Group fixed wing aerial response personnel resourcing in AMOSC FWADOps Plan (*AMOSC, 2020*)

† As stated in the FWADOps Plan, these roles are subject to Civil Aviation Safety Authority (CASA) requirements. The numbers stated above are reasonable estimates.

~ AMOSC FWADOps Plan has 6 air tractors available. The additional two required will be contracted by Santos; AFR will be approached first with request to supply these aircraft.

Table T-4: OSRL C-130 (Hercules) aerial dispersant application – Field resourcing requirements

Aerial dispersant resource	No. required per aircraft (minimum)	No. aircraft	Total no. required	Source of personnel
Support location (onshore Airbase FOB, likely to be Port Hedland International Airport)*				
OSRL Supervisor	1	1	1	OSRL
OSRL ground/ops. crew	4	1	4	OSRL
		OSRL Ground/Ops. Crew total:	**5**	
Dispersant Ops. Group (at sea ops. at application site)				
OSRL C-130				
C-130 Pilot†	1	1	1	OSRL C-130 contract
C-130 First Officer†	1	1	1	OSRL C-130 contract
C-130 Flight Engineer†	1	1	1	OSRL C-130 contract
OSRL ground/ops. crew	*Number as per OSRL ops. crew above*			
		Dispersant Ops. Group Total:	**8**	
		Total personnel:	**8**	

† As per OSRL IAR Hercules C-130 Mobilisation and Logistics Plan (*OSRL, 2021*). These roles are subject to Civil Aviation Safety Authority (CASA) requirements. The numbers stated above are reasonable estimates.

Table T-5: Requirement, Availability and Timing for Trained Response Personnel

Capability Details	Week 1	Week 2	Week 3	Week 4 onwards	Peak Timing Requirement and Availability
Monitor & Evaluate					
Aerial Observers	Requirement: 2 Availability: 2 (AMOSC, Industry Core Group)	Requirement: 2 Availability: 2 (AMOSC, Industry Core Group)	Requirement: 2 Availability: 2 (AMOSC, Industry Core Group)	Requirement: 2 Availability: 2 (AMOSC, Industry Core Group)	Requirement: 2 Availability: 2 Constant
SCAT	Requirement: 4[34] Availability: 8 (Santos, AMOSC Staff)	Requirement: 4 Availability: 8 (Santos, AMOSC Staff)	Requirement: 4 Availability: 48 (Santos, AMOSC Staff, OSRL, TRG)	Requirement: 4 Availability: 56[35] (Santos, AMOSC Staff, OSRL, TRG, Training)	Requirement: 48 Availability: 56 Weeks 9-11
Containment & Recovery					
Team Leaders	Requirement: 21 Availability: 21 (Industry Core Group)	Requirement: 21 Availability: 21 (Industry Core Group)	Requirement: 21 Availability: 21 (Industry Core Group)	Requirement: 21 Availability: 21 (Industry Core Group)	Requirement: 21 Availability: 21 Constant
Chemical Dispersant					
Vessel Based Application Team Leaders	Requirement: 8 Availability: 8 (Industry Core Group)	Requirement: 8 Availability: 8 (Industry Core Group)	Requirement: 8 Availability: 8 (Industry Core Group)	Requirement: 8 Availability: 8 (Industry Core Group)	Requirement: 8 Availability: 8 Constant

[34] Expected SCAT requirements as outlined in Table 10-40

[35] Includes 48 available personnel from week 3, plus a group of 8 personnel to receive Just-In-Time training.

Capability Details	Week 1	Week 2	Week 3	Week 4 onwards	Peak Timing Requirement and Availability
Aerial Application Trained Responders	Requirement: 6 Availability: 6 (AMOSC FWADC, OSRL[36])	Requirement: 6 Availability: 6 (AMOSC FWADC, OSRL)	Requirement: 6 Availability: 6 (AMOSC FWADC, OSRL)	Requirement: 6 Availability: 6 (AMOSC FWADC, OSRL)	Requirement: 6 Availability: 6 Constant
Protection & Deflection[37]					
Team Leaders	Requirement: 3 Availability: 3 (Industry Core Group)	Requirement: 3 Availability: 3 (Industry Core Group)	Requirement: 3 Availability: 12 (Industry Core Group, OSRL, TRG)	Requirement: 5 Availability: 12 (Industry Core Group, OSRL, TRG)	Requirement: 12 Availability: 12 Week 6
Shoreline Clean-up[38]					
Team Leaders	Requirement: 0 Availability: 20 (Industry Core Group)	Requirement:0 Availability: 20 (Industry Core Group)	Requirement: 20 Availability: 40 (Industry Core Group, OSRL, TRG)	Requirement: 35 Availability: 48[39] (Industry Core Group, OSRL, TRG, Training)	Requirement: 40 Availability: 48 Week 8

[36] In the event that OSRL C130 support crew are not available for the initial two weeks of the response, trained personnel will be sourced from Santos' logistics provider CH Robinson.

[37] Based on deterministic run #9 as shown in

Table 14-4 and Table 14-5.

[38] Based on deterministic run #31 as shown in Table 15-6.

[39] Includes 40 available personnel from week 3, plus a group of 8 personnel to receive Just-In-Time training.

Appendix U: Containment and Recovery Logistics

Containment and Recovery Logistics

Santos has MSAs in place with a range of vessel providers, and the processes and procedures in place to obtain the required offshore marine logistics resources to execute containment and recovery operations in a timely fashion. **Table U-1** to **Table U-5** show the current (as of November 2021) vessel availability for the following types of vessels involved in containment and recovery operations from vessel providers that Santos current has MSAs in place with:

- Deployment vessels with integrated recovered oil storage (**Table U-1**);
- Deployment vessels without integrated recovered oil storage (i.e. recovered oil will need to be stored on deck) (**Table U-2**);
- Towing vessels (**Table U-3**);
- Barge vessels for containerised on-deck recovered oil storage (**Table U-4**);
- Tanker vessels for integrated recovered oil storage (**Table U-5**).

It should be noted this information is provided only as an example indication of vessel availability. Vessel availability constantly evolves in response to market conditions, which are closely monitored by the Santos Marine Logistics Team.

Table U-1: List of potential containment and recovery deployment vessels with integrated recovered oil storage (as of 12th November 2021)

Vessel name	Class	Availability	Location	MSA in place	Recovered oil capacity (m^3)	Vessel operator
Pacific Centurion	AHTS	Locally based: 1-2 days	Dampier	Yes	1,360	Swire Pacific Offshore
Toll Provider	OSV	Locally based: 1-2 days	Dampier	Yes	660	Toll Marine
Maersk Master	AHTS	Locally based: 1-2 days	Dampier	Yes	1,250	Maersk Supply Service
Maersk Mover	AHTS	Locally based: 1-2 days	Dampier	Yes	1,250	Maersk Supply Service
Normand Scorpion	AHTS	3-7 days	Broome	Yes	1,372	Solstad Offshore
Normand Sirius	AHTS	3-7 days	Broome	Yes	1,523	Solstad Offshore
Normand Saracen	AHTS	3-7 days	Dampier	Yes	1,372	Solstad Offshore
Far Senator	AHTS	3-7 days	Dampier	Yes	1,372	Solstad Offshore
Normand Ranger	AHTS	Locally based: 1-2 days	Dampier	Yes	1,299	Solstad Offshore
Go Spica	AHTS	Locally based: 1-2 days	Dampier	Yes	561	GO Offshore
Siem Amethyst	AHTS	7-10 days	Singapore	Yes	647	Siem Offshore
Skandi Atlantic	AHTS	7-10 days	Darwin	Yes	460	Dof Management
Siem Topaz	AHTS	11-20 days	Melbourne	Yes	647	Siem Offshore
Siem Sapphire	AHTS	11-20 days	Melbourne	Yes	647	Siem Offshore
Siem Aquamarine	AHTS	11-20 days	Melbourne	Yes	647	Siem Offshore

Table U-2: List of potential containment and recovery deployment vessels without integrated recovered oil storage (*i.e. recovered oil will need to be stored on deck*) (as of 12th November 2021)

Vessel name	Class	Availability	Location	MSA in place	Vessel operator
CMV Athos	OSV	Locally based: 1-2 days	Dampier	Yes	Bhagwan Marine
Mermaid Cove	OSV	Locally based: 1-2 days	Dampier	Yes	MMA Offshore
Mermaid Sound	OSV	7-10 days	Fremantle	Yes	MMA Offshore
Mermaid Strait	OSV	Locally based: 1-2 days	Dampier	Yes	MMA Offshore
Nor Captain	AHTS	7-10 days	Singapore	Yes	Solstad Offshore
Go Sirius	AHTS	7-10 days	Darwin	Yes	GO Offshore
RT Raven	OSV	3-7 days	Darwin	Yes	Kotug Marine
MMA Monarch	AHTS	3-7 days	Broome	Yes	MMA Offshore
RT Roebuck Bay	OSV	3-7 days	Broome	Yes	Kotug Marine
RT Kuri Bay	OSV	3-7 days	Broome	Yes	Kotug Marine
RT Beagle Bay	OSV	3-7 days	Broome	Yes	Kotug Marine
Pacific Valour	AHTS	7-10 days	Darwin	Yes	Swire Pacific Offshore
An Rong	AHTS	7-10 days	Singapore	No	Ad-hoc contract
Ace Javelin	AHTS	7-10 days	Singapore	No	Ad-hoc contract
An Ju	AHTS	7-10 days	Singapore	No	Ad-hoc contract
Bridgewater 163	AHTS	7-10 days	Singapore	No	Ad-hoc contract
Synergy Explorer	AHTS	7-10 days	Singapore	No	Ad-hoc contract
Geo Sovereign	AHTS	7-10 days	Singapore	No	Ad-hoc contract
MP Endurance	AHTS	7-10 days	Singapore	No	Ad-hoc contract
Bhatera Intan	AHTS	7-10 days	Singapore	No	Ad-hoc contract
Ena Future	AHTS	7-10 days	Singapore	No	Ad-hoc contract
Ena Fortitude	AHTS	7-10 days	Singapore	No	Ad-hoc contract

Note: This is not an exhaustive list. In addition to the above, it is identified there are at least another 32 suitable vessels in Singapore which would be available in the 7-10 day range, as advised by broker Clarkson Platou.

Table U-3: List of potential towing vessels (as of 12th November 2021)

Vessel name	Class	Availability	Location	MSA in place	Vessel operator
Jetwave Asari	Utility Vessel	Locally based: 1-2 days	Dampier	Yes	Jetwave Marine
Stenella	Utility Vessel	Locally based: 1-2 days	Exmouth	Yes	Bhagwan Marine
Loligo	Utility Vessel	Locally based: 1-2 days	Dampier	Yes	Bhagwan Marine
Pure Adrenalin	Utility Vessel	Locally based: 1-2 days	Dampier	Yes	Bhagwan Marine
Elyse	Utility Vessel	Locally based: 1-2 days	Dampier	Yes	Bhagwan Marine
George	Tug	Locally based: 1-2 days	Dampier	Yes	Bhagwan Marine
Harrietta	Tug	Locally based: 1-2 days	Dampier	Yes	Bhagwan Marine
Adrenalin Sprint	Utility Vessel	Locally based: 1-2 days	Dampier	Yes	Bhagwan Marine
Enrybo Kae	Utility Vessel	Locally based: 1-2 days	Dampier	Yes	Bhagwan Marine
Jilly B	Utility Vessel	Locally based: 1-2 days	Dampier	Yes	Bhagwan Marine
Kaelani	Utility Vessel	Locally based: 1-2 days	Dampier	Yes	Bhagwan Marine
Tempest	Utility Vessel	Locally based: 1-2 days	Dampier	Yes	Bhagwan Marine
DP2 Seamaster	OSV	3-7 days	Fremantle	Yes	Bhagwan Marine
Bhagwan K	Utility Vessel	3-7 days	Darwin	Yes	Bhagwan Marine
Broadsword	Utility Vessel	3-7 days	Darwin	Yes	Bhagwan Marine
Lauri J	Utility Vessel	3-7 days	Darwin	Yes	Bhagwan Marine
Jetwave Lightning	Utility Vessel	Locally based: 1-2 days	Dampier	Yes	Jetwave Marine
Jetwave Jasmin	Utility Vessel	Locally based: 1-2 days	Exmouth	Yes	Jetwave Marine
Jetwave Element	Utility Vessel	Locally based: 1-2 days	Dampier	Yes	Jetwave Marine
RT Raven	OSV	3-7 days	Darwin	Yes	Kotug Marine
RT Roebuck Bay	OSV	3-7 days	Broome	Yes	Kotug Marine
RT Kuri Bay	OSV	3-7 days	Broome	Yes	Kotug Marine
RT Beagle Bay	OSV	3-7 days	Broome	Yes	Kotug Marine
Warrego	Utility Vessel	Locally based: 1-2 days	Exmouth	Yes	Gun Marine
Outer Limit	Utility Vessel	Locally based: 1-2 days	Exmouth	Yes	Offshore Unlimited
Limitless	Utility Vessel	Locally based - 1-2 days	Exmouth	Yes	Offshore Unlimited

Table U-4: List of potential barge vessels for containerised on-deck recovered oil storage (as of 12th November 2021)

Vessel name	Class	Availability	Location	MSA in place	Vessel operator
Arnhem Constructor	Dumb Barge	7-10 days	Darwin	Yes	Bhagwan Marine
Blaydin Constructor	Dumb Barge	7-10 days	Darwin	Yes	Bhagwan Marine
Curtis Constructor	Dumb Barge	7-10 days	Darwin	Yes	Bhagwan Marine
HM Bougar	Dumb Barge	7-10 days	Darwin	Yes	Bhagwan Marine
Lanpan CB3	Dumb Barge	7-10 days	Darwin	Yes	Bhagwan Marine
Sampan	Dumb Barge	7-10 days	Darwin	Yes	Bhagwan Marine
AMS Gladstone	Dumb Barge	11-20 days	Brisbane	Yes	Bhagwan Marine
Constructor 1	Dumb Barge	11-20 days	Brisbane	Yes	Bhagwan Marine
Crest 181	Dumb Barge	11-20 days	Brisbane	Yes	Bhagwan Marine
MMA Brewster	PSV	7-10 days	Darwin	Yes	MMA Offshore
MMA Inscription	PSV	7-10 days	Darwin	Yes	MMA Offshore
Normand Swan	PSV	3-7 days	Broome	Yes	Solstad Offshore
Toll Hobart	PSV	Locally based: 1-2 days	Dampier	Yes	Toll Marine
Alamo	Utility Vessel	3-7 days	Dampier	Yes	Bhagwan Marine
MMA Leeuwin	PSV	Locally based: 1-2 days	Dampier	Yes	MMA Offshore

Table U-5: Tanker vessels for integrated recovered oil storage (as of 12th November 2021)

Vessel name	Class	Availability	Location	MSA in place	Recovered oil capacity (m^3)	Vessel operator
Far Seeker	PSV	Locally based: 1-2 days	Dampier	Yes	1,113	Solstad Offshore
Normand Leader	PSV	Locally based: 1-2 days	Dampier	Yes	1,883	Solstad Offshore
Normand Skimmer	PSV	Locally based: 1-2 days	Dampier	Yes	1,143	Solstad Offshore
Normand Tortuga	PSV	11-20 days	New Zealand	Yes	977	Solstad Offshore
Krasnodar	Oil Tanker	7-10 days	Singapore	No	123,798	Ad-hoc contract
Pacific Dawn	Oil Tanker	7-10 days	Singapore	No	115,572	Ad-hoc contract
Seaprincess	Oil Tanker	7-10 days	Singapore	No	124,092	Ad-hoc contract
Asahi Princess	Oil Tanker	7-10 days	Singapore	No	105,361	Ad-hoc contract
Sapporo Princess	Oil Tanker	7-10 days	Singapore	No	105,354	Ad-hoc contract
New Accord	Oil Tanker	7-10 days	Singapore	No	117,937	Ad-hoc contract
Gumsunoro	Oil Tanker	7-10 days	Singapore	No	114,600	Ad-hoc contract
Platanos	Oil Tanker	7-10 days	Singapore	No	114,578	Ad-hoc contract

Note: This is not an exhaustive list. In addition to the above, it is identified there are at least another 6 suitable vessels in Singapore which would be available in the 7-10 day range, as advised by broker Clarkson Platou.