

EOG Resources, Inc ('EOG') Beehive Pre-Drilling Seabed Assessment (PDSA) Environment Plan – titleholder response

This titleholder response has been prepared in accordance with NOPSEMA’s Guidance Note *Responding to public comment on environment plans* (N-04750-GN1847, A662607, September 2020) using the template provided by NOPSEMA document N-04750-FM1846.

| Matter | EOG response |
|---|--|
| <p>1 <i>Seismic surveys result in damage to marine life.</i> One submission claims that the intense sound waves of seismic surveys damage or kill fish eggs and larvae and impair the hearing and health of fish. They also disrupt and displace important migratory patterns, pushing marine life away from suitable habitats like nurseries and foraging, mating, spawning, and migratory corridors, and casue whale stranding.</p> | <p>In accordance with Section 4 of NOPSEMA’s <i>Guidance Note Responding to public comment on Environment Plans</i>, because these comments do not specifically relate to the activity to which the EP relates, they are not considered relevant. Notwithstanding this, below is EOG’s response to the claim.</p> <p>The shallow seismic component of the Beehive PDSA activity is a very low-impact and short-term part of the overall activity and is not a traditional marine seismic survey (MSS), the sort in which the submitter perhaps assumes. As detailed in Table 2.1 of the EP, a sound source no greater than 100 cubic inches (cui) will be used for the shallow seismic survey. This is an order of magnitude less than a tradition 3D MSS, which typically uses in the order of 2,500-3,500 cui. The shallow seismic survey would take no more than a few days to complete. The environmental impact assessment for underwater sound originating from the geophysical equipment is detailed in Sections 7.1 and 7.2 of the EP and assessed impacts to all marine life as ‘negligible’. This is based on numerous factors, including:</p> <ul style="list-style-type: none"> • Underwater sound emissions are temporary; • The sound sources are small; • The distances to effect for underwater sound from geophysical equipment are very low (generally less than 1 km for most receptors); • Biologically important areas (BIAs) for cetaceans (whales and dolphins) and fish do not occur in or around the activity area; • There is only one active commercial fishery in the activity area, and the timing of the activity is likely to avoid that fishery’s operating season; and • There is no spatially limiting habitat in or around the activity area; <p>EOG is cognisant of the concerns regarding potential impacts to cetaceans from MSS. The Australian oil and gas exploration industry has operated within well-defined guidelines for minimising</p> |

| Matter | EOG response |
|--------|---|
| | <p>such impacts for many years, and there have been no reported cases of injury or death to cetaceans from MSS in Australian waters.</p> <p>The control measures listed in the EP are designed to avoid or minimise impacts to cetaceans.</p> |

Note: As per the NOPSEMA guidance note, *claims* are noted in this table. However, these *claims* are generally only implied or inferred in the submissions rather than expressly stated, so there may be some error in interpreting what the claims are.