



Ref: 100226-HSE-OGL-00122

26th February 2010

Environment Division
Department of Mines and Petroleum
100 Plain Street
EAST PERTH WA 6004

Attention: Ms Jacqueline Lutz
Environmental Assessor
Petroleum Branch

Dear Ms Lutz,

Poseidon 3D Marine Seismic Survey Environment Plan ALL/HSE/016 Browse Basin WA-314-P, WA-315-P, WA-398-P

As per discussions with your office this week, ConocoPhillips is proposing to record an additional single seismic line through the ConocoPhillips permits WA-315-P and WA-398-P at the completion of the Poseidon 3D seismic survey next week. Please refer to Figure 1 attached.

The line runs approximately north-south and will provide a valuable tie from the recently completed Poseidon-2 well location through the Poseidon 3D seismic survey area into the 2007 Endurance 3D seismic survey area. It is anticipated that it will take approximately 12 hours to record the line, on or about 5 March 2010.

ConocoPhillips has assessed the risk of this activity in line with our current EP and the Endurance EP (EP All/HSE/PLN/010). The Endurance survey was conducted in the permits WA-398-P and WA-396-P in 2007. Both Environment Plans contain information pertaining to operating a seismic program in the area (see Figure 1) with operations under both EPs being conducted over the months of February and March. ConocoPhillips believes conducting the additional seismic line presents no further risk to the environment.

Acquisition of the proposed additional seismic line will be managed in accordance with the environment management strategies included in the existing Poseidon survey EP. The managements strategies as summarized below, reference Section 7 of ALL/HSE/016 Poseidon 3D Marine Seismic Survey Approved Environment Plan:

Table 1. Risk Assessment Table

Management Strategy	Controls	Risk Assessment for Additional Seismic Line
Management of Air Emissions	Use of low sulphur diesel fuel. Seismic contractor's procedural documents for: <ul style="list-style-type: none"> • Equipment maintenance and repair. • Marine operations 	No change to risk
Management of Spills	<ul style="list-style-type: none"> • Solid streamers • Dry-break hoses used for bunkering operations. • The vessels are equipped with oil spill response kits to contain and clean up small spillages of oil and chemicals and prevent them from going overboard. • Any machinery space bilge water to be discharged overboard is routed to the MARPOL-approved oily water separator before disposal. Concentration of OIW is not to exceed 15 ppm. • Offshore fuel transfer/bunkering work instructions. • Instructions for recovery of lost/damaged seismic streamer. • Offshore emergency response procedure. • HSE incident reporting procedure. • Environmental protection procedure. • Ballast water management. • ConocoPhillips Spill Response Plan Doc. No. ALL/HSE/PLN/002 • Watch (visual, radio and radar) maintained at all times that survey vessel is under way. 	No change to risk
Management of Waste	<ul style="list-style-type: none"> • No overboard discharge of sewage whilst any vessel is in harbour. • Provision of waste segregation bins on survey vessel. • Combustible wastes are incinerated in IMO-approved incinerators. • Hazardous waste materials (such as medical waste, lithium batteries and aerosol cans) are segregated, labelled and disposed of by waste disposal specialists onshore. • Waste management procedures. • Environmental protection procedures. • Offshore emergency response procedure. 	No change to risk

	<ul style="list-style-type: none"> • HSE incident reporting procedure. 	
Management of Seabed Impacts	<ul style="list-style-type: none"> • Seismic contractor's procedural documents for: <ul style="list-style-type: none"> - Instructions for recovery of lost/damaged seismic streamer. - Lifting and towing equipment procedures. - Offshore emergency response procedure. 	No change to risk; water depths greater than 300m and no closer than 20km distance from reefs
Management of Interactions with Wildlife	<ul style="list-style-type: none"> • Survey vessel steering system allows collision-avoiding action to be undertaken. • Seismic contractor's procedural documents for: <ul style="list-style-type: none"> • Marine Mammal Interaction Policy and Procedures. • Wildlife Interaction Policy and Procedures. • Standard Management Procedures detailed in EPBC Act Policy Statement 2.1 (September 2008) • A dedicated MMO will be on board the seismic vessel for the duration of the survey. • Watch maintained at all times that survey vessel is under way. 	No change to risk; MMO will remain onboard for the duration of the program.
Management of Social and Economic Impacts on Marine Users	<ul style="list-style-type: none"> • Navigation aids (lights, flags, radar, etc.) on survey vessel. • Marine radio channels and other communication systems. <p>Contractor's HSEMS documents covering:</p> <ul style="list-style-type: none"> • Marine Operations General Safety Procedure. • Offshore Emergency Response Procedure. • Watch (visual, radio and radar) maintained at all times that survey vessel is under way. • Notification of survey vessel's location to AMSA – AusCoast warnings. • Notifications to commercial fishermen, AFMA and Fisheries WA. • All AQIS regulations will be met prior to survey taking place. • Quarantine covers general requirements relating to terrestrial pests, insects and waste food stuffs. 	No change to risk; Vessel movements between our permit blocks and the port of Broome have continued throughout the program without issue.

Extensive stakeholder consultation was conducted in 2009 leading up to the seismic program commencement in October 2009. ConocoPhillips did not receive any notification from the fishing industry or any other stakeholder regarding activity in the same area, and in fact no fishing vessels have been encountered during our survey activities to date in the areas covered in Figure 1.



If you have any questions or requests for additional information, please contact Roald Brotherton
roald.a.brotherton@conocophillips.com or telephone (08) 6363 2118 at any time.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Roald Brotherton', written over a faint circular stamp.

Roald Brotherton
Operations Director
For and on behalf of ConocoPhillips (Browse Basin) Pty Ltd

Figure 1. Proposed Seismic Line through Permit Area

