

ENVIRONMENT PLAN

Beehive Multi-Well Exploration Drilling

4.Consultation

WA-488-P

16 December 2024

Rev 2

4. Consultation

EOG is required to consult with relevant persons in preparation of this EP. As defined by NOPSEMA, consultation is a two-way process where information is shared between titleholders and relevant persons that provides an opportunity for relevant persons who may be affected by an offshore petroleum activity to raise concerns, seek information about how they will be affected and how the titleholder intends to manage the activity so that impacts and risks are ALARP and acceptable.

This chapter documents the process that was followed to undertake consultation for the multi-well drilling with relevant persons in accordance with OPGGS(E), along with a summary of the outcomes of that process. This chapter demonstrates that EOG has carried out consultation as required by applicable law and that the measures adopted because of the consultations are reasonable and appropriate.

EOG has previously consulted on the following proposed phases of the Beehive project, and the EPs for these activities should be viewed for a complete history of consultation on the Beehive project:

- Beehive-1 Exploration Drilling – the EP was accepted by NOPSEMA on the 10th of June 2024 (see NOPSEMA website here).
- Beehive Geotechnical Assessment – the EP was accepted by NOPSEMA on the 29th of January 2024 (see NOPSEMA website here).
- Beehive Pre-Drill Seabed Assessment (PDSA) – the EP was accepted by NOPSEMA on the 2nd of March 2022 (see NOPSEMA website here).

Because the spill EMBA (environment that may be affected) for this activity is the same as that for the Beehive-1 Exploration Drilling program (which also encompasses the smaller spill EMBAs for the geotechnical and PSDA EPs), relevant persons consultation for this activity is linked closely to the consultation undertaken for the previous activities, such that those relevant persons consulted with under the previous efforts have been re-engaged to ensure that all relevant persons have the opportunity to consult on this multi-well drilling activity.

To provide the complete history of consultation efforts to date, this chapter describes consultation undertaken by EOG between February 2024 and August 2024 for the proposed activity. This includes exhibiting a draft of this EP on the EOG website from the 17th of April 2024, which has been followed by exhibition on the NOPSEMA website between 8 July 2024 and 7 August 2024 prior to formal submission to NOPSEMA for assessment.

4.1. Relevant Persons Consultation – Background and Legislative Requirements

The Federal Court of Australia's appeal decision in December 2022 (*Santos NA Barossa Pty Ltd v Tipakalippa* [2022]) (the Decision), sets forth the requirements for consultation in accordance with OPGGS(E). At the time of the Decision, this EP was under assessment by NOPSEMA; following which, EOG revised its methodology to reflect the intent of the Decision. The regulatory environment continues to evolve and further court decisions have been rendered, including *Cooper v NOPSEMA (No 2)* [2023] FCA 1158 and *Munkara v Santos NA Barossa Pty Ltd (No 3)* [2024] FCA 9. In addition, NOPSEMA has moved to update the regulations and guidelines in respect of the preparation of an EP with the most recent update being Document N-04750-GL2086 A900179 published on 20 May 2024 titled "Consultation in the course of preparing an environment plan". To guide the consultation process, EOG developed a Relevant Persons Consultation and Engagement Plan (RPCEP) (**Appendix 2**) that outlines EOG's revised consultation and engagement activities. The RPCEP lists the requirements for consultation in accordance with relevant NOPSEMA regulations, policies, guidance

and information papers and was informed by the guiding principles of the International Association for Public Participation (IAP2).

The consultation process was informed by the following regulations, policies and guidance:

- OPGGS(E):
    - Regulation 25 – defines 'Relevant Persons', requires that the titleholder must give each relevant person sufficient information and time to make an informed decision of the possible consequences of the activity on their functions, interests or activities.
    - Regulation 22(15) – requires that ongoing consultation be incorporated into the Implementation Strategy of the EP.
    - Regulation 24(b) – requires that the EP contain a summary and full text of stakeholder consultation.
- NOPSEMA policies, guidance, and information papers, including:
    - PL1347 - Environment plan assessment policy (January 2024).
    - GL1721 - Environment plan decision making (January 2024).
    - GL1887 - Consultation with Commonwealth agencies with responsibilities in the marine area (January 2024).
    - GL2086 - Consultation in the course of preparing an environment plan (May 2024).
    - GN1344 - Environment plan content requirements (January 2024).
    - GN1488 - Oil pollution risk management (July 2021).
    - GN1785 - Petroleum activities and Australian Marine Parks (January 2024).
    - GN1847 - Responding to public comment on environment plans (January 2024).
    - Brochure - Consultation on offshore petroleum environment plans: Information for the community (May 2023).
- Other relevant guidance, including:
    - Australian Fisheries Management Authority: Petroleum industry consultation with the commercial fishing industry (available at https://www.afma.gov.au/sustainability-environment/petroleum-industry-consultation).
    - Western Australian Department of Primary Industries and Region Development (DPIRD): Guidance statement for oil and gas industry consultation with the Department of Fisheries (July 2013).
    - Western Australian Department of Transport (DoT): Offshore Petroleum Industry Guidance Note – Marine Oil Pollution: Response and Consultation Arrangements (July 2020).
    - Petroleum activities and Australian Marine Parks (Guidance note - Petroleum Activities and Australian Marine Parks.pdf (nopsema.gov.au).
    - Australian Institute of Aboriginal and Torres Strait Islander Studies (AIATSIS) Engaging with Traditional Owners Guidance (December 2020).
    - Interim Engaging with First Nations People and Communities on Assessments and Approvals Under the *Environment Protection and Biodiversity Conservation Act 1999* (DCCEEW 2023a).
    - Guidelines for working in the near and offshore environment to protect Underwater

Cultural Heritage (DCCEEW 2023b).

4.2. Relevant Persons Consultation – Key Duties

EOG identified seven key legislative duties it must discharge in carrying out consultation with relevant persons in preparation of this EP. This chapter and EOG's RPCEP (**Appendix 2**) summarise these duties by describing what EOG committed to do and what EOG did to fulfil these commitments. References are made throughout this chapter to demonstrate these commitments were achieved.

The key legislative duties required of titleholders under the OPGGS(E) are to:

1. Consult with relevant persons (Regulation 25(1));
2. Provide sufficient information to relevant persons (Regulation 25(2));
3. Describe the relevant values and sensitivities of the environment that may be affected by the activity (Regulation 21(2)(b));
4. Allow a reasonable period for relevant persons to assess the sufficient information (Regulation 25(3));
5. Assess the merit of each objection or claim (Regulation 24(b)(ii));
6. Respond to each objection or claim (Regulation 24(b)(iii); and
7. Ensure consultation is ongoing if appropriate.

4.2.1. Duty 1: Consult with Relevant Persons

The OPGGS(E) create a distinction between the public at large and relevant persons (authorities, organisations, and persons), and require consultation with all relevant persons in the preparation of an EP. The OPGGS(E) further specify that relevant persons include people and organisations whose functions, interests, and activities may be affected by the petroleum activity. Titleholders are required to consult with relevant persons as defined by the OPGGS(E).

Regulation 25(1) of the OPGGS(E) defines a 'relevant person' as:

A. Each Commonwealth, State or NT agency or authority to which the activities to be carried out under the EP may be relevant;

B. If the EP relates to activities in the offshore area of a State-the Department of the responsible State Minister;

C. If the EP relates to activities in the Principal NT offshore area-the Department of the responsible NT Minister;

D. A person or organisation whose functions, interests or activities may be affected by the activities to be carried out under the EP; and

E. Any other person or organisation that the titleholder considers relevant.

Identification of potentially affected persons is the first step in being able to manage and address the concerns and issues of groups, organisations, or individuals who may impact or be impacted by the activity. When EOG prepares an EP, it seeks to proactively identify relevant persons and provide them opportunity to be consulted consistent with the regulated process and will continue identification activities throughout the activity.

EOG recognises that a community can be disaggregated, and that a member of a community may identify differently from the community at large. EOG undertook a comprehensive multi-level approach to identify, invite and consult with relevant persons whose functions, interests, or activities

may be affected by the proposed activities. These methodologies are open-ended approaches that cast a broad net. The result is that a large pool is created from both general and targeted searches from which relevant persons can be located so that it is reasonable to conclude that all relevant persons have been identified.

EOG used the following methods to find relevant persons (authorities, organisations and persons) who may be affected:

- **Geographic searches -** geospatial focused and location-based search of maps and public GIS data to help form an understanding of the persons and organisations within the environment planning area.
- **Healthy Country Plans -** review of Aboriginal Corporation public Healthy Country Plans (HCP) to understand the values and sensitivities for those groups within the Work Plan area.
- **Government agencies and organisations -** relevant government agencies may have information about individuals and organisations that may be affected by the Work Plan
- **Review of EPs accepted and under assessment within the same region -** previous petroleum activities within a bioregion show who has previously engaged in consultation with petroleum titleholders. It is a broad search method with large coverage.
- **Online internet research -** a search for news articles and press releases about similar activities in the environment planning area and identify individuals and groups that were mentioned.
- **Notices in print media -** EOG utilised the *NT News*, *The Australian*, *The West Australian*, *Koori Mail* and *The Kimberley Echo* to provide notice of the activity and seek input and feedback.
- **Social media searches -** the use of social media to find relevant persons by following local groups and searching for pages, hashtags and key words related to the activity.
- **Dedicated activity-specific EOG website -** making activity information available to the public and allowing persons or organizations to self-identify.
- **Referrals from others -** asking relevant persons if they know of other relevant persons.
- **Self-identification -** through the outreach methods and actions listed above, EOG provides several avenues for relevant persons to self-identify and engage in the consultation process.

Once a relevant person was identified, under the OPGGS(E), EOG must tell any authority, person, or organisation that:

- They have been identified as a relevant person;
- The subsequent consultation effort is being undertaken as per the prescribed process; and
- EOG is obligated to expressly advise them of titleholder obligations for consultation.

Consultation for this multi-well drilling activity has been tiered to the relevant persons consultation undertaken for previous Beehive activities (as outlined at the start of this chapter). In September 2021, EOG commenced consultation with relevant persons for the Beehive PSDA EP. This identified 62 relevant persons with whom EOG consulted. In July 2022, to continue to improve and enhance its consultation processes, EOG began to update its consultation methodology and identification of relevant persons. This process was informed by feedback from NOPSEMA as well as an understanding of evolving best practices, which in part emanated from the *Santos NA Baross Pty Ltd v Tipakalippa*

[2022] FCAFC 193 decision (see Schedule C of the RPCEP at **Appendix 2** for EOG's summary of key implications from this case). This included re-evaluating the functions, interests and activities of those parties within the spill EMBA (see Section 5.1 for definition of the spill EMBA) and how they could be impacted by the proposed activity. Since the revised approach, and at the time the Beehive-1 drilling EP was re-submitted to NOPSEMA for assessment in early March 2024, 529 relevant persons were identified and consulted, with one organisation (the Durduga Tree Point Aboriginal Association Incorporated, DTPAAI) being assessed as non-relevant.

For the Beehive multi-well drilling activity, 454 relevant persons have been consulted. This lower number than that for the Beehive-1 drilling consultation is due to changes in government agencies, the aggregation of some groups and the removal of some relevant persons (i.e., fishing licence holders that had continuous returned mail).

Identifying Relevant Persons for Regulation 25(1)(a), (b) and (c)

Identifying the relevant persons in these categories is a reasonably straightforward exercise due to the publicly available information about Government departments, the consultation that has occurred by other titleholders in the past that is publicly available, and some specific guidance notes prepared by Government departments and agencies.

Each government agency or authority has been identified through online searches, expert advice, review of legislation, and review of previous EPs adjacent to the title area. NOPSEMA guideline GL1887 identifies the government agencies as a relevant person as they have responsibilities within the Commonwealth marine area. The full list of relevant authorities is included in Table 4.1.

Table 4.1. Relevant Persons under Regulation 25(1)(a), (b) and (c)

Relevant Authorities	Role and Relevancy
Regulation 25(1)(a) Each Commonwealth, State or NT agency or authority to which the activities to be carried out under the EP may be relevant	
Commonwealth	
Australian Communications and Media Authority (ACMA)	Administrator of submarine cable protection zones. Relevant when the activity may impact on subsea cables.
Australian Fisheries Management Authority (AFMA)	Manager of fisheries in Commonwealth waters. Relevant when the activity has the potential to impact on fisheries resources in AFMA managed fisheries.
Australian Hydrographic Office (AHO)	Responsible for the publication and distribution of nautical charts and other information required for safe shipping and navigation in Australian waters. Relevant when the activity may impact operational requirements and where nautical products and other maritime safety information is required to be updated.
Australian Maritime Safety Authority (AMSA)	Responsible for maritime safety. Relevant when the activity may impact on the safe navigation of commercial shipping and to determine shipping traffic in the activity area.
Department of Agriculture, Fisheries and Forestry (DAFF)	Responsible for managing biosecurity for incoming goods and conveyances. Relevant due to the potential for the transfer of marine pests between MODU, vessels and the mainland.

Relevant Authorities	Role and Relevancy
Department of Climate Change, Energy, the Environment and Water (DCCEEW)	Administers *the Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), the *Underwater Cultural Heritage Act 2018* and the *Environment Protection (Sea Dumping) Act 1981*. Relevant if underwater cultural heritage is directly or indirectly adversely affected by the activity.
Department of Defence (DoD)	Responsible for Australian defence activities. Relevant when the activity encroaches on known training areas and/or restricted airspace.
Department of Foreign Affairs and Trade (DFAT)	Promotes and protects Australia's interests internationally. Manages relationships with countries neighbouring Australia's north, including Indonesia, Timor Leste and Papua New Guinea. Relevant when the activity may impact on waters outside Australia's maritime jurisdiction (such as an oil spill).
Director of National Parks (DNP)	Manages the AMP network. Relevant when activities undertaken outside an AMP may impact on the values within an AMP.
Maritime Border Command (MBC)	Key agency for border protection. Relevant when the activity may impact on border protection activities (e.g., vessel patrols).
National Native Title Tribunal (NNTT)	Responsible for administration of the *Native Title Act 1993*. Relevant when the activity may impact on Native Title. Maintains registers (and associated mapping) of native title determinations, prescribed bodies corporate, and registered native title claims.
WA	
Department of Biodiversity, Conservation and Attractions (DBCA)	Manage State marine parks and reserves and protected marine fauna and flora. Relevant when activities undertaken outside a marine park may impact on the values within a marine park.
Department of Primary Industries and Regional Development (DPIRD)	Managed West Australian commercial fisheries. Relevant when the activity has the potential to impact on fisheries resources in DPIRD.
Department of Fisheries (DoF)	Managed West Australian commercial fisheries. Relevant when the activity has the potential to impact on fisheries resources in DPIRD.
Department of Planning, Lands and Heritage (DPLH)	Protect Aboriginal heritage, assist with compliance with the *Aboriginal Heritage Act 1972* and provide access to heritage information. Relevant if the activity results in impacts to Aboriginal heritage.
Department of Transport (DoT)	Manage oil pollution preparedness for response in WA state waters. Relevant if the activity results in impacts to a marine park.
Pilbara Ports Authority	Manage the Dampier Port under the *Port Authorities Act 1999 (WA).* Relevant if the activity results in impacts to port activities.
NT	

Relevant Authorities	Role and Relevancy
Department of Environment, Parks and Water Security (DEPWS)	Protect the environment and natural resources in the NT, including marine fauna management. Relevant when activities may impact on marine or coastal values.
Department of Transport (DoT)	Manage oil pollution preparedness and response in NT waters. Relevant if the activity results in impacts to the NT waters or coastlines.
Environmental Protection Authority (EPA)	Independent authority established under the *Northern Territory Environment Protection Authority Act 2012* to prevent and respond to pollution. Relevant if the activity results in pollution to NT waters or coastline.
Regulation 25(1)(b) The Department of the responsible State Minister	
WA Department of Mines, Industry Regulation and Safety (DMIRS)	Manages offshore petroleum approvals in WA State waters. Relevant if the activity results in impacts to WA state waters.
Regulation 25(1)(c) The Department of the responsible NT Minister	
NT Department of Industry, Tourism and Trade (DITT) - Fisheries	Responsible for managing NT fisheries and aquatic ecosystems. Relevant when the activity has the potential to impact on fisheries resources in DITT managed fisheries.

Identifying Relevant Persons for Regulation 25(1)(d) and (e)

Subject-centred groups

Subject-centred grouping allows for tailoring identification, communication and engagement strategies. People and organisations grouped into subject-centred categories can allow the search for one member of a group to lead to the discovery of additional members of that group. The identification of persons or organisations within subject-centred groups necessarily evolved as engagement with these groups was carried out. In all cases, each person contacted is asked to identify other relevant persons and encouraged to share information about the petroleum activity and how to connect us with others in the subject-centred group.

Table 4.2 identifies the subject-centred groups targeted in the preparation of this EP and a summary of strategies used by EOG to reveal persons or organisations within the groups. A person could be associated with more than one of these groups while an organisation is more likely to associate with just one.

Table 4.2. Tailored consultation approaches conducted for subject-centred groups

Subject-centred group	Tailored strategy to identify relevant persons
Marine users	• EOG posted notices at ports, boat launches, and ramps to connect with a wide variety of marine users (Table 4.5).
Tourism operators	• Online searches for cruise operators, marine tours and recreational experiences such as marine mammal observations, diving, recreational fishing and thrill-seeking experiences. • Online searches for marine-based community or sporting events.
First Nations Peoples	The following activities were undertaken to identify First Nations Peoples: • Visited local government authority websites (shire or municipal council) that

Subject-centred group	Tailored strategy to identify relevant persons

	often include acknowledgement of Traditional Owners.
	• Searched state and territory government websites that include information about Traditional Owners in their jurisdictions, especially in the context of information about local offices.
	• Searched online for states' and territories' Aboriginal and Torres Strait Islander consultative bodies.
	• Contacted land councils representing the local Aboriginal or Torres Strait Islander communities.
	• Online searches for Native Title groups and corporations on the prescribed bodies corporate (PBC) website.
	• Registered searches on the National Native Title Tribunal (NNTT) website.
	• Geospatial searches by completing the forms on the NNTT website.
	Note: EOG categorises any person with Native Title claims of any standing (i.e., claim or determination) as a relevant person.
	Methods of identifying First Nations Peoples that may be relevant persons included:
	• Assessed the values and sensitivities of the EMBA.
	• Desktop research of any public Sea Country information within the EMBA of each specific activity.
	  ○ AMP management plans.
	  ○ Aboriginal group HCPs.
	• Engaged with First Nations groups such as land councils and PBC to seek who they represent; how First Nations groups or individuals should be consulted as relevant persons; and if there are any groups or persons that EOG had not identified.
	• Provided information via written correspondence, information flyers, and the project-specific website, and continued to engage with additional relevant persons or organisations as they were identified.
	• Advertised in Aboriginal-owned publications, *Koori Mail* and *The Kimberley Echo* newspapers, to invite consultation with any person who may have a function, interest or activity that may be affected by the activity. Use of Aboriginal-owned publications allows for persons that have not yet been identified to self-identify as relevant.

Port users	• Contacted harbour masters to enquire about frequent users. • Online searches for businesses located at wharves in regional ports.
Petroleum titleholders	• Queried the National Electronic Approvals Tracking System (NEATS) database to find titles and titleholders within the EMBA. • Queried the NOPSEMA EP database to find other titleholders with petroleum activities. • Subscribed to the NOPSEMA EP submissions pages for all activities within the EMBA.
Commercial fishers	• Requested data from the Commonwealth, WA and NT fishing authorities to understand historical fishing activity. • Visited local ports to find local fishers who operate in the region. • Contacted all state-licensed fishers. • Contacted all Commonwealth fishing license holders. • Queried and reviewed the Fisheries Research and Development Corporation

Subject-centred group	Tailored strategy to identify relevant persons
	(FRDC) website, including the annual State of the Fisheries Report (www.fish.wa.gov.au). • Engaged with the Western Australia Fishing Industry Council, Inc (WAFIC).
Recreational fishers	• Engaged with recreational fishing associations to advertise in newsletters/circulars or websites. ○ Requested contact details for license holders. ○ Requested to engage with advisory bodies or reference groups to establish the best approach to identify relevant persons.
Native Title Prescribed Bodies Corporate and Land Councils	• Sought contact details of land councils from the NNTT. • Online searches for Native Title PBC on the PBC website. • Cross-referenced PBC contact details with the Office of the Registrar of Indigenous Corporations.
Conservation groups	• Reviewed previously submitted EPs on the NOPSEMA website. • Online searches for conservation groups with interests in similar activities. • Online searches for new articles and current campaigns related to similar activities.
Fishing associations	• Identified target species within the EMBA through online research. • Requested contact details for license holders.
Other marine users	• Online searches for groups who use or have a connection to the marine environment.
Commercial shipping	• Contacted harbour masters and shipping agents to enquire about frequent users. • Online searches for businesses located at wharves in regional ports.
Local councils	• Queried the WA and NT Electoral Commission and Government databases for councils, shires and cities. *Note:* NOPSEMA guideline GL1887 identifies the government agencies as a relevant person because they have responsibilities within the Commonwealth marine area.
Educational bodies	• Contacted the Department of Education to identify relevant institutions and research programs. • Contacted universities to identify any relevant research programs. *Note*: For this category, the exposure thresholds for monitoring potential impacts of the activity were used rather than the socio-economic thresholds, because this is more relevant to the likely activities of research institutions.
Commerce	• Online searches for businesses located at wharves in regional ports. • Online searches for news articles or press releases about marine-based businesses in the area.
Ports and harbours	• Reviewed automatic information system (AIS) data of vessel activities along the coast to establish frequented ports. • Reviewed the WA and NT boat ramp databases. • Contacted local councils, cities and shires for listing of local boat ramps and users.

Subject-centred group	Tailored strategy to identify relevant persons
Heritage groups	• Contacted WA and NT heritage organisations to identify relevant persons. • Queried the Australian Heritage Database. • Queried the Australasian Underwater Cultural Heritage Database.

The outcome of the approaches listed in Table 4.2 resulted in the complete list of relevant persons applicable to the proposed activity, presented in **Appendix 3** and **Appendix 4** (named individuals). In addition to the strategies listed in Table 4.2, the following strategies as stated in the RPCEP were also considered but not undertaken because the databases or systems were not in place to accomplish these strategies:

- Request Tourism Australia and Tourism WA to query databases of local businesses along the coastline within the socio-economic risk EMBA; and
- Enquire with local Chambers of Commerce to identify marine-based tourism operators and local marine-based businesses in the region.

The subject-centred strategies used to search for relevant persons in Table 4.2 were primarily focused on persons within and proximate to the Beehive multi-well drilling EP spill EMBA (see Section 5.1 for a description of the spill EMBA), which facilitated a broad capture of relevant persons. Furthermore, the communication strategies discussed in the following sections specifically targeted persons proximate to the activity (see also Section 5 of the RPCEP in **Appendix 2**).

International Persons

EOG has also considered the potential that relevant persons may exist in international waters. EOG has not been contacted directly by an international person who identified themselves as a relevant person. However, should international persons make themselves known to EOG as a relevant person for the purposes of this activity, EOG will make an assessment of this and if they are determined to be relevant, add them to the list of relevant persons.

It is possible that persons based in Indonesia would have an interest in fishing and aquaculture in the waters offshore from their coastlines. Nonetheless, at the low exposure concentration of 10 ppb used to define the outer extent of the spill EMBA for dissolved and entrained hydrocarbons (see Section 8.7.1) and which come close to Indonesia, there is not considered to be any exposure pathways resulting in ecological/toxicity impacts to fish or other receptors and therefore no effect on the functions, interest or activities of Indonesian coastal communities who may be undertaking fishing or aquaculture activities in coastal waters. As such, EOG considers that there is no potential for functions, interests or activities to be materially affected and therefore concludes that there are no internationally relevant persons applicable to this activity.

In addition, traditional Indonesian fishing effort is focused on shallow waters rather than the deep waters of the permit areas and EOG has engaged with individual fishers, fishing organisations and fishing regulatory bodies. In regard to Indonesian fishers, such persons are not accessible through a register as there is no requirement for traditional fishers to be licensed by either the Australian or Indonesian governments. There is no publicly available information to identify these individuals. As per the Santos Decision, the obligation to identify relevant persons for the purpose of consultation must be reasonably capable of discharge within a reasonable time and there is an evident need for all relevant persons to be ascertainable. The inability to identify traditional Indonesian fishers combined with EOG providing information via its website that is accessible globally (as described in further detail later in this section) is reasonable and workable.

Nonetheless, it is also reasonable and practicable to assume that the interests of traditional fishers are the same as those of licensed commercial fishers operating in Australia that EOG has been able to contact. EOG has considered feedback from Australian commercial fishers and fishing associations in relation to potential impacts to fish communities.

Public Outreach

To complement the proactive and comprehensive searches for relevant persons via subject-centred groups, EOG also undertook a broader approach (both geographically and demographically) to raise public awareness, so persons not contacted as part of the tailored consultation could learn the details of the Beehive Project and self-identify as a relevant person. Each public outreach activity is listed in this section and fully described in the RPCEP (**Appendix 2**).

EOG Australia website

The EOG Australia website (https://www.eogresources.com/australia/) provides an overview of EOG Australia. In February 2024, a summary of the proposed multi-well drilling activity and activity map was posted, along with links to the project-specific online consultation hub, summary Fisheries Compensation Protocol, WA-488-P permit details, EPs (geophysical, geotechnical, Beehive 1 drilling) and information flyers. A draft of this EP (Revision A) was also made available on the website from mid-April 2024.

Establish a Dedicated Project-specific website

EOG launched a project-specific website (https://klarite.mysocialpinpoint.com.au/beehive) on 11 May 2023 as the central tool to convey information and updates about all Beehive exploration activities , potential environmental impacts and risks and control measures to mitigate them. The nature of the internet allows anyone in Australia and further extending to anyone in the world with internet access, to learn and choose to engage with the project in any manner they wish, thus removing geographic limitations for consultation. This platform provides opportunity for users to self-identify as a relevant person and request consultation with EOG. The website includes a feedback form and EOG contact information including telephone number, mailing address, and email address. The project-specific website will remain available throughout the EP assessment process and throughout the activity as the central place for updates on the activity.

A link to the project-specific website is included on the EOG Australia website (see previous sub-section). EOG project information, project map, QR code and link to the project-specific website were also included in public notices in print media (Table 4.3), and posted on notice boards at boat ramps, ports, local councils and other prominent community gathering sites within the spill EMBA, as listed in Table 4.5. This central tool allows users to review the project information at their own pace on their own schedule and ensures all relevant project information is made available anytime, anywhere.

The project-specific website invites the user to explore the following:

- *Consultation Information*
    - What are the consultation requirements? Provides information to all relevant persons so they can make an informed assessment of how their functions, interests and activities may be affected by the proposed activities.
    - What should I do if I want to be included in consultation? Provides a user-friendly, readily accessible means to register per activity as a relevant person.
    - What should I do if I don't want to be consulted? Provides a user friendly, readily accessible means to opt out of consultation per activity.

- What happens if I don't respond to the information provided to me through the consultation process? Provides details on EOG's actions if party contacted by EOG does not respond.

- *Relevant Person Information*
  - What is a relevant person and how do I know if I am one? Describes what it means to be a relevant person and provide access to the Beehive Consultation Survey if user is unsure if they are a relevant person.
  - How do I advise EOG if I believe I am a relevant person? Provides the variety of ways available to register as a relevant person.
  - What are my rights and obligations as a relevant person? Provides detail of the regulations regarding information shared during consultation.
  - I think someone I know could be a relevant person, what should I do? Provides EOG contact information to share with others.
- *What is an Environment Plan?* Provides background information on the purpose of an EP.
  - Description of the activity.
  - Description of the existing environment.
  - Environmental impact and risk assessment.
  - Environmental management measures and commitments.
  - Environmental spill response measures contained within an OPEP.
  - Summary of the consultation record.
- *Interactive Project-specific Information*:
  - Beehive geotechnical assessment
    - EP status.
    - Activity summary.
    - Activity map.
    - Geotechnical assessment information.
    - Geotechnical assessment interactive map.
    - Current EP.
    - Information flyers.
  - Beehive-1 exploration drilling
    - EP status.
    - Activity summary.
    - Activity map.
    - Drilling activity information.
    - Drilling interactive map.
    - Current OPEP.
    - Information flyers.
  - Beehive multi-well exploration Drilling

- A draft of this EP (Revision A) was available from mid-April 2024.
- Activity summary.
- Activity map.
- Drilling activity information.
- Drilling interactive map.
- Information flyer.

- *Beehive Consultation Survey and Feedback*
  - Relevant Persons
    - Identify functions, interests, or activities that may be affected.
    - Activity-specific surveys.
    - Opt-in/Opt-out of consultation process.
    - Confidentiality Statement.
    - Provide feedback.
  - General Public
    - Sign-up for project updates.
    - Confidentiality Statement.
    - Provide feedback.

Through the Beehive Consultation Survey, users are able to determine whether their activities, interests or functions have the potential to be affected by the project and the option to self-identify as a relevant person. The consultation survey provides relevant persons and the general public opportunity to provide feedback and comments, make suggestions for improvements, and sign up to receive project updates and information flyers. EOG's confidentiality policy is declared within the feedback form, with respondents having to elect whether their information be made public or removed from any documents made public, prior to submitting their information.

Public Notices in Print Media

Five advertisements were published in Australian national, regional and local newspapers in late February 2024 regarding the multi-well drilling campaign, as listed in Table 4.3 (the advertisements are provided in **Appendix 5**). The advertisements included a link/QR code for the project-specific website along with contact details (email address and phone number) for readers to provide EOG with comments on the proposed activity.

Table 4.3. Newspaper advertising of the proposed activity

Newspaper	Coverage	Publication date
General public notices		
The Australian	National	28 February 2024
Koori Mail	National	28 February 2024
NT News	Regional (NT)	28 February 2024
The West Australian	Regional (WA)	28 February 2024

Newspaper	Coverage	Publication date
The Kimberley Echo	Local (WA)	29 February 2024
Associated with EP submission to NOPSEMA for public exhibition		
The Australian	National	13 July 2024
Koori Mail	National	31 July 2024
NT News	Regional (NT)	13 July 2024
The West Australian	Regional (WA)	18 July 2024
The Kimberley Echo	Local (WA)	18 July 2024

Publication of Information Flyers

Information flyers have been produced periodically since 2021 to provide relevant persons and the general public specific information about the activity (Table 4.4, **Appendix 6**). Information flyers were used to introduce EOG and the Beehive project, provide descriptions of the geotechnical, geophysical and drilling processes, and to discuss the purpose of the EP relative to regulatory requirements. Tailored subject-centred flyers were created for relevant persons that requested more information or information in a different form.

The information flyers provided a description of the relevant persons consultation process, an invitation to consult with EOG, a QR code for the project-specific website, and contact details. The flyers were emailed to relevant persons, accessible through the project-specific website and the EOG Australia website, and appended to written correspondence as necessary.

Table 4.4. Beehive-1 information flyers

Flyer	Date	Focus
1	15 September 2021	Geophysical and geotechnical investigations
2	1 December 2021	Update on geophysical and geotechnical investigations
3	28 February 2022	Drilling program
4	11 May 2022	Updates on geophysical and geotechnical investigations and drilling program
5	27 June 2022	Updates on drilling program and geotechnical investigations and EP status
6	May 2023	Introduction to the project-specific website and updates on the drilling program and geotechnical investigations and EP status
7	February 2024	Introduction to the Beehive multi-well drilling program and updates on geophysical and geotechnical investigations, Beehive-1 drilling program and EP status.

Public Notices at Prominent Locations

Public notices were developed to span a broader and more general audience that might otherwise not receive or have access to notifications provided by email, in print media or on internet platforms. During May and June 2024, A4-sized public notices were distributed in high-traffic areas throughout

the spill EMBA on notice boards, at boat ramps, ports, local councils and other prominent community gathering sites, listed in Table 4.5.

Public notices specifically tailored for relevant subject-centred groups and individual persons were created and displayed in specific areas frequented by subject-centred relevant persons (e.g., fishers, tourism operators) within the spill EMBA. The primary purpose of the public notices was to inform the general public of the activity and invite consultation with relevant persons. Public notices provided the project-specific website QR code so that the public could access information about the activity, determine if they are a relevant person, and contact EOG.

Table 4.5. Public notice posting locations for the multi-well drilling activity

Town	Location	Posting Date
WA		
Broome	Broome Historical Museum	In June 2024, staff at each venue were unwilling to display the notice without the permission of management. It is assumed that the signs have not been placed in these locations.
	Broome Boat Shop	
	Diverse Watersports and Marine	
Kununurra	IGA supermarket	22 June 2024
	Coles supermarket	22 June 2024
	Shire of Wyndham/East Kimberley Council office	22 June 2024
	Red Sun Sports and Casual Gear	22 June 2024
Wyndham	Wyndham boat ramp (corflute sign)	22 June 2024
	Shire of Wyndham/East Kimberley	22 June 2024
	Wyndham supermarket	22 June 2024
	Wyndham post office	22 June 2024
NT		
Darwin	Dinah Beach Cruising Yacht Club	8 May 2024
	Best Foods Frances Bay Village	8 May 2024
	Fishing & Outdoor World Darwin	8 May 2024 - staff were unwilling to display the notice without the permission of management. It is assumed that the sign was not placed in this location.
Larrakeyah	Cullen Bay Marina	8 May 2024
Fannie Bay	Darwin Trailer Boat Club	8 May 2024
Berrimah	Craig's Fishing Tackle Shop	8 May 2024
Millner	Anaconda Darwin	8 May 2024
Wagait Beach	Wagait Beach supermarket	9 May 2024

Town	Location	Posting Date
Dundee Beach	The Lodge of Dundee	8 May 2024

Access to self-identify as a relevant person

Project-specific website

The project-specific website (https://klarite.mysocialpinpoint.com.au/beehive) was specifically designed to convey information about the proposed activity, and enable users no matter their location to determine whether they are a relevant person. Through the Beehive Consultation Survey, users are able to determine whether their activities, interests or functions have the potential to be affected by the project and thereby self-identify as a relevant person. The consultation survey also directs relevant persons to either request to consult with EOG or opt out of the consultation process. Relevant persons can also sign up for updates and information flyers, or specifically request to be excluded from all correspondence. EOG's confidentiality policy is declared within the consultation survey, with respondents having to elect whether their information be made public or removed from any documents made public, prior to submitting their information.

Print media, public notices and information flyers

For those who do not have access to the internet or otherwise do not interact online, EOG contact information (telephone numbers and mailing address) was provided in advertisements in print media, public notices, and information flyers.

Request relevant persons identify other relevant persons

To amass as great an assemblage of relevant persons as possible, each person contacted was encouraged to share information about the project and thereby identify other relevant persons. This request was included in written correspondence, and project information sessions, and included on the project-specific website. In addition, the Beehive Consultation Survey on the project-specific website explains that EOG is "*seeking to engage with any other person to improve our environmental management of this activity*" and specifically requests that readers share the website with others who might be a relevant person.

Consultation

This section describes how EOG has consulted with relevant persons.

Invite co-design of the consultation process for each relevant person

Utilising the methods previously outlined, relevant persons were invited to engage with EOG in co-design of the consultation process to ensure that the consultation process was adapted to the nature of the relevant person and their interests. Written correspondence was the primary means used to conduct formal consultation between EOG and relevant persons. Phone calls were used to follow up on initial correspondence to ensure receipt of initial email correspondence.

Customised communication appropriate to relevant persons

A variety of communication methods were employed respective of the preferred methods requested by the different subject-centered groups. Written correspondence is the primary means used to conduct consultation between EOG and relevant persons. If a relevant person requested more information, or the information in a different form, subject-specific flyers were created to tailor the information to the relevant person that made the request. The full list of communication methods is described below. Communication records are included as 'sensitive information' (in

accordance with OPGGS(E) Regulation 26(8)) in **Appendix 7**.

Written Correspondence

Written correspondence is the primary means used to conduct consultation and is tailored specifically to communicate appropriately with relevant persons. It has been used to initiate (or continue) consultation with authorities, organisations and subject-centred groups. Written correspondence was used to provide notifications on project milestones and availability of activity-specific online information, and to request input and invite co-design of the consultation process. Written correspondence has also been used to respond to enquiries and to request any remaining feedback that had not been previously addressed.

Phone Calls and Virtual Meetings

The EOG consultation team utilised phone calls and virtual meetings to maintain rapport and continue timely consultation with relevant persons, to confirm receipt of correspondence and offer opportunity to ask questions and clarify information provided through written correspondence and other media. All relevant persons were encouraged to provide feedback and present their concerns regarding the project.

On 11 March 2024, the Dambimangari Aboriginal Corporation (DAC) requested that EOG present at the DAC Board meeting. Due to logistics of travel between EOG's North American headquarters and the DAC office location in Derby, it was decided between the parties that EOG would present virtually to the DAC Board on 10 April 2024. This meeting included a specific presentation for the DAC regarding EOG's current and proposed activities.

Face-to-face Meetings

EOG has hosted multiple in-person meetings for previous EPs related to Beehive drilling activities to facilitate consultation with Native Title holders, Aboriginal land holders and Traditional Owners. Information was prepared to communicate details of the Beehive project and potential impacts and risks, including possible effects on Native Title and traditional country, as well as resources integral to culture and customs. Information and concerns of relevant persons gathered during those meetings have been incorporated into the content of this multi-well drilling EP. Summaries of in-person meetings conducted for the Beehive-1 Exploration Drilling activity are presented in Section 4.2.1 of the NOPSEMA-accepted Beehive-1 drilling EP (available on the Beehive website here).

EOG has made specific efforts to engage with First Nations peoples, as presented in Section 3.4.3 of the RPCEP (**Appendix 2**), to inform EOG about cultural features within and proximate to the Beehive multi-well drilling spill EMBA. In fulfilling these objectives, EOG has:

(1) Engaged with the First Nations groups such as land councils and PBCs to seek who they represent, how First Nations groups or individuals should be consulted as relevant persons, and if there are any groups or persons which EOG had not identified;

(2) Provided information via written correspondence, subject-centred information flyers, and the project-specific website, and consistently engaged with additional relevant persons or organisations as they were identified; and

(3) Advertised in *Koori Mail* and in *The Kimberley Echo*, regional print media serving Aboriginal people and communities in Northern Australia.

Determination of Representation of the Land Councils

Both the TLC and the NLC expressed a preference that EOG's consultation activities be conducted through these land councils, as representatives for their constituents. In contrast, the KLC saw the organisation as a relevant person in its own right but advised EOG to directly contact the Aboriginal

peoples within the KLC boundaries.

KLC also recommended, and EOG did utilise the services of KRED to undertake project information sessions for previous Beehive activities. Comments and concerns gathered during those information sessions have been factored into the content of this multi-well drilling EP. A summary of those information sessions has been documented in the Beehive-1 drilling EP (available on the Beehive website here).

To date, no information sessions have been requested or conducted for the multi-well drilling activity.

Confidentiality and sensitive information

As stated in Section 5.6 of the RPCEP (**Appendix 2**), EOG has communicated the legislative requirements around sensitive information. Throughout the consultation process and in all communications, EOG has reminded relevant persons of their right to request that any information provided during the consultation not be made publicly available. While that information must still be included in the EP submitted to NOPSEMA as "*sensitive information*", it would be excluded from the information published on NOPSEMA's website. This declaration has been included in public notices, information flyers, written correspondence, and in the Beehive Consultation Survey and Feedback form on the project-specific website.

On the main page of the project-specific website, it reads:

> "*As a Relevant Person, you may request that information you provide during the consultation not be made publicly available. That information must still be included in the EPs submitted to NOPSEMA as sensitive information but will be excluded from information published on NOPSEMA's website*".

Furthermore, EOG's confidentiality policy was declared within the Beehive Consultation Survey and Feedback form, with respondents having to elect whether their information be made public or removed from any documents made public, prior to submitting their information. The statement of confidentiality also noted that information would be included in the EP submitted to NOPSEMA as "*sensitive information"* but excluded from information made publicly available on NOPSEMA's website.

As a specific example of the confidentiality notice provided by EOG in its communications, information flyer #6 (May 2023) and information flyer #7 (February 2024) provided the following confidentiality statement:

> *Note: you may request that information you provide during the consultation not be made publicly available. That information must still be included in the environment plan submitted to NOPSEMA as sensitive information but will be excluded from information published on NOPSEMA's website. * The Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2009 (including the definitions, sections 9(8), and 11A(4)) indicate that, if requested, information that you or your organisation provides, along with personal information, will be considered "sensitive information". Environment plans published by NOPSEMA on its website do not include any information deemed as sensitive.*

Protocol for unresponsive relevant persons

All attempts to contact relevant persons after the mail out of information flyers were recorded in EOG's consultation management system. If after multiple attempts to contact relevant persons, no response had been received, the following actions were employed to ensure compliance with EOG's requirement to consult with relevant persons on the proposed activity:

- Multiple phone calls, written correspondence and emails;
- Follow-up after 20 business days (4 weeks) from issue of initial consultation materials;
- Final follow-up prior to the resubmission of the EP; and
- Use of other broader consultation methods, including newspaper advertising and information flyers.

All of the above strategies were implemented to contact relevant persons multiple times.

4.2.2. Duty 2: Provide Sufficient Information

In accordance with OPGGS(E) Regulation 25(2), titleholders must provide sufficient information to each relevant person during the consultation process. To achieve this, EOG committed to the process as outlined in the RPCEP and implemented the information and outreach actions summarised below.

Tailor information to relevant persons functions, interests, activities

Project-specific website

The project-specific website includes the Beehive Consultation Survey and Feedback form, which clearly defines "functions", "interests" and "activities" to enable potentially relevant persons to accurately self-identify as a relevant person. The interactive map enables users to determine whether their functions, interests or activities have potential to be affected by the project. Through the survey, users can specify their interests relative to the project and identify those aspects of the project for which they desire more information or information in a specific manner.

The consultation survey provides relevant persons and the public with an opportunity to provide feedback on the proposed activity, make suggestions for improvements, and sign up to receive project updates and information flyers. The project-specific website allows relevant persons to review the information at their own pace on their own schedule and ensures that all current project information is made available anytime, anywhere.

The website includes interactive self-guided links as listed in Section 4.2.1 so that individuals can access specific information relevant to their unique functions, interests and activities.

EOG's confidentiality policy is declared within the feedback form, with respondents having to elect whether their information be made public or removed from any documents made public, prior to submitting their information.

Information flyers

In recognition of the needs and particular interests of specific relevant persons and groups, tailored subject-centred flyers were created for relevant persons that requested more information or information in a different form.

4.2.3. Duty 3: Describe the Environment that may be Affected by the Activity

In accordance with OPGGS(E) Regulation 21(2)(b), titleholders are expected to use consultation with relevant persons to improve the description of the environment that may be affected by the activity and increase predictive certainty of the impact assessment. To discharge this duty, EOG committed to the processes as outlined in the RPCEP. The following is a summary of how EOG completed each commitment.

Engage relevant persons

Relevant persons were invited to communicate information about their environment and sensitivities through the project-specific website, phone calls, and written correspondence, as described in Section 4.2.1. Furthermore, EOG made specific efforts to engage with First Nations peoples to inform EOG about cultural features of the EMBA. EOG has engaged with land councils and PBCs, provided information via written correspondence, specific subject-centred information flyers and consistently engaged with additional relevant persons or organisations as they were identified.

Publicise the EMBA / Invite feedback

EOG has published the description of the environment in the following locations that have been available to relevant persons throughout consultation: the project-specific website, Beehive-1 drilling, Beehive multi-well drilling and Beehive geotechnical interactive map and comment portal, information flyers #3, #5, #6 and #7, email correspondence, and relevant persons-specific requested information packets.

Additionally, this EP is being published on NOPSEMA's website with an invitation for public comment for 30 days. EOG advertised the EP's publication in national, regional and local print media (see Table 4.3).

Online interactive access to project maps and communications

EOG developed the project-specific website, launched 11 May 2023, as the central tool to convey information about the proposed activity, potential environmental risks and controls in place. The website's interactive map allows users to view the proposed drilling activity in context with other spatial features—depicting the Beehive multi-well location, AMPs and state marine parks, and the EMBA. The interactive map allows users to place comments directly on the map to share feedback regarding the activity with EOG. This feature enables precise and easy communication of location-based environmental values and sensitivities.

The website also provides a comment form, an email address, mailing address and telephone number for alternative methods of contact. As of 24 June 2024, the following user statistics for the multi-well drilling part of the website are:

- 39 total visits;
- 17 unique users;
- 4 document downloads;
- 0 consultation survey responses; and
- 0 comments posted to the interactive multi-well drilling map.

Additionally, throughout the relevant persons consultation process other forms of communication, telephone numbers, a mailing address, and email addresses have been shared with relevant persons. Relevant persons could contact the EOG team directly and share location-based information.

4.2.4. Duty 4: Reasonable Period for Relevant Persons to Assess the Sufficient Information

As required by OPGGS(E) Regulation 25(3), consultation must allow a reasonable period for relevant persons to review the proposed activities. The consultation period, described in **Appendix 2**, states that consultation with relevant persons during the development of an EP will generally run for 30 calendar days (four weeks).

All relevant persons consulted for this activity have had greater than 30 days to assess the information provided by EOG and make comment, claims and objections, as noted by the following drilling-specific timeline of consultation:

- 22-23 February 2024 – issue Information Flyer #7 to 454 relevant persons via email with an invitation to review the activity and provide feedback;
- 23-26 February 2024 – mail out campaign to relevant persons with an invitation to review the activity and provide feedback;
- 28-29 February 2024 – EOG placed advertisements with *The Australian*, *The Kimberley Echo*, *Koori Mail, NT News,* and *The West Australian* newspapers, advising of the multi-well drilling activity availability with a link and QR code for the Beehive website and inviting comments.
- February 2024 - update the Beehive website to include the multi-well EP details;
- 27 February to June 2024 – 152 telephone calls to follow up on written and email correspondence;
- 17 April 2024 – publish a draft of this EP on EOG's Beehive website;
- April 2024 – email follow ups to 172 relevant persons (where only email addresses were available) and letters issued to 286 relevant persons (who did not have an email address on file); and
- Late June/early July 2024 - EOG placed advertisements with *NT News*, *The Australian*, and *The West Australian* newspapers, advising of the EP's availability on the NOPSEMA website and inviting comments.

Appendix 8 provides a complete summary of consultation undertaken with dates of consultation. Up to the point of submission of this EP to NOPSEMA for public exhibition on the NOPSEMA website, relevant persons have been provided with over 16 weeks to provide feedback to EOG about this activity, including over 8 weeks where a full copy of this EP has been available online on the EOG website.

4.2.5. Duty 5: Assessment of Merit of Objections and Claims

As required by OPGGS(E) Regulation 24(b)(ii), titleholders are obligated to assess objections or claims from relevant persons and provide a response to each relevant person about each objection or claim. Titleholders are also required to adopt appropriate measures as a result of the consultations with relevant persons. This section provides a summary of how EOG fulfilled this duty.

EOG recognises and respects each relevant person's need to be identified and included in the fulfillment of the consultation processes and therefore followed a stringent process to assess the merit of objections and claims from relevant persons to ensure that their concerns were recognised and fully addressed. Written correspondence was used to respond to enquiries and to request any remaining feedback that had not been previously addressed.

The EOG consultation team followed a standard protocol to assess the merit of claims and objections to the EP and provide feedback to all relevant persons with regards to enquiries, objections or claims. All objections and claims were recorded in EOG's consultation management system and assessed based on the following criteria:

- Relevance to environmental management of the activity;
- Relevance to the persons' functions, interests, and activities; and
- Whether the objection or claim can be resolved through the adoption of additional control measures, an activity design variation, or through changes to the Implementation Strategy for the EP.

For objections or claims found to have merit, EOG incorporated measures that avoid, manage or mitigate the objection or claim into this EP. For objections and claims found to not have merit with regards to the criteria, the claim was recorded and reasons documented. In all instances, each claim or objection was recorded and the relevant person responded to via written correspondence providing an explanation of EOG's assessment of merit and a request for additional feedback in an effort to uncover any remaining objections or claims. Additional claims were again considered relative to the merit criteria and the process repeated until the relevant person's claim or objection had been satisfactorily considered.

Despite best efforts to resolve all objections and claims, EOG understands that relevant persons may not agree with its assessment of merit regarding their objection or claim. Such circumstances do not preclude EOG's submittal of this EP to NOPSEMA for assessment.

Appendix 8 provides a complete list of consultation undertaken with relevant persons, inclusive of an assessment of merits of objections or claims. Full records of all correspondence with relevant persons are provided in **Appendix 7** (Sensitive Matters Report), which is submitted to NOPSEMA separately to this EP. **Appendix 4** provides a list of the named individual(s) presented in **Appendix 8**, which is submitted to NOPSEMA separately to this EP as sensitive information.

Table 4.6 provides a summary of the objections and claims raised by relevant persons throughout the consultation process for this activity, along with an assessment of merit of each objection or claim and how EOG has addressed this. Objections or claims made in relation to the Beehive-1 drilling EP have been factored into the content of this multi-well EP, and the objections or claims for Beehive-1 are presented in Table 4.6 of the Beehive-1 drilling EP (available on the Beehive website here).

Table 4.6. Summary of relevant person objections and claims for the Beehive multi-well activity

Theme	Relevant persons	Objections and claims raised by relevant person	Assessment of merit of objections and claims	Measures adopted by EOG in response to objections and claims
Prior to first public exhibition of the EP (prior to 8 July 2024)				
Request to consult	Top End Aboriginal Coastal Alliance (TEACA)	The TEACA called EOG to identify themselves as a Relevant Person for the Beehive multi-well drilling EP. The TEACA would like to discuss the activity and be directly contacted and asked that the most recent project communications be sent to them. TEACA requested that communication be through face-to-face meetings.	This request is relevant to the functions, interests and activities of the TEACA and therefore have merit.	EOG issued the most recent project information flyer (#7) to the TEACA the day following contact, along with links to the project website and previous Beehive EPs. EOG also entered TEACA into its consultation database, so they are included in all future project communications. Further, EOG held a meeting with TEACA in Darwin on 28 August 2024. No specific concerns or objections were raised by TEACA at that time, but further information was requested. EOG provided the further requested information on the 24th of October via email and will ensure ongoing consultation takes place with TEACA and its members.
Impacts to commercial fishing	Equinox Fishing Charters	When called by EOG in follow up to the issue of Flyer #7, a representative of this fishing charter company claimed that the information they had received from EOG was too long and didn't address the key points succinctly. They wanted it noted that they are opposed to the project and they would prefer for the drilling and blasting to not go ahead. They stated that the fishing industry in the area would be negatively affected by operational activities due to	This claim is relevant to the functions, interests and activities of Equinox Fishing Charters and therefore have merit.	EOG will look into methods of communication with relevant persons and customise communication as necessary.

Theme	Relevant persons	Objections and claims raised by relevant person	Assessment of merit of objections and claims	Measures adopted by EOG in response to objections and claims
		its proximity to the coastline (referenced times of low fishing productivity in the JBG from earthquakes in Indonesia).		
	Tuna Australia	In response to a phone call from EOG to follow up on Flyer #7, Tuna Australia stated that it is not prepared to make comments on the project without a Consultation Services Agreement, which mandates an hourly fee be paid with a minimum hour commitment, in order for consultation to proceed.	NOPSEMA's brochure GL2086 *Consultation in the course of preparing an environment plan* (May 2023) indicates that there is no requirement in law for titleholders to pay relevant persons' costs associated with consultation. There is therefore no merit to this claim.	EOG did not respond in writing to Tuna Australia's comment given that this exact issue had been dealt with for the Beehive-1 drilling EP. For Beehive-1, EOG explained to Tuna Australia that it had consulted with the individual Southern Bluefin Tuna and Western Tuna and Billfish fishery license holders and peak representative bodies (the fishing zones for those fisheries overlap the spill EMBA). EOG also noted that the ABARES fishing data indicates there is no recent fishing effort near the activity area for any tuna fisheries.
Oil spill impacts	Dambimangari Aboriginal Corporation	During a virtual presentation to the DAC Board meeting, the DAC asked various questions about whether marine fauna migrations from the coast to the sea had been considered and what the impacts of an oil spill would be to marine life.	This request for information is relevant to the functions, interests and activities of the DAC and therefore has merit.	EOG was unable to answer some of the questions in detail during the meeting, but provided a detailed response letter a few weeks after the meeting. The letter provided a summary response to each question and directed the DAC to sections of the Beehive-1 EP (online) so they could read more detailed information.
	Gogolanyngor Aboriginal Corporation	The GAC requested an update on oil spill pollution modelling.	This request for information is relevant to the functions, interests and activities of the GAC and therefore has merit.	EOG provided a flyer to the GAC with information about the oil spill modelling results.
	WA DBCA	The DBCA noted the many marine parks, islands and coastal reserves in the spill EMBA that may be impacted in the event of a large hydrocarbon spill.	This concern is relevant to the functions, interests and activities	Chapter 5 of this EP describes all conservation values in the impacts EMBA,

Theme	Relevant persons	Objections and claims raised by relevant person	Assessment of merit of objections and claims	Measures adopted by EOG in response to objections and claims
		They asked that the necessary baseline values of these areas be understood. If baseline data is not available, they requested that EOG establish what baseline information is available in order to be available to undertake Before-After, Control-Impact (BACI) studies in the event of a large spill.	of the DBCA and therefore has merit.	and **Appendix 11** of this EP describes all conservation values in the impacts EMBA. **Appendix C** of the OPEP outlines the scientific monitoring arrangements that will be implemented in the event of a LoWC.
Sensitive receptors	DBCA	The DBCA also suggested using the *National Light Pollution Guidelines for Wildlife Including Marine Turtles, Seabirds and Migratory Shorebirds* as a best-practice industry standard for managing potential impacts of light pollution on marine fauna.	This concern is relevant to the functions, interests and activities of the DBCA and therefore has merit.	The light pollution guidelines were already referenced in the EIA in Section 7.3 of this EP.
Submissions in response to first public exhibition of this EP (after 8 July 2024)				
There were three submissions in response to the public exhibition of this EP.				
Impacts to the environment and controls in place	Individual in response to public notice in the West Australian	General concerns were raised regarding the impacts of Beehive multi-well drilling campaign on the environment and wildlife that inhabit the area. The individual asked what safeguards are in place should anything go wrong. They requested that the information be supplied to them, and they not be directed to a 'website or anything'.	These concerns are relevant to the functions, interests and activities of this individual and therefore have merit.	All potential impacts are described and assessed in Chapter 7 and risks are assessed in Chapter 8 of this EP. Proposed control measures are included in these chapters for each impact or risk identified.
	Conservation Council of WA (CCWA)	CCWA raised concerns that the proposal has the potential to produce direct and indirect impacts to ecologically significant offshore, nearshore and onshore ecological communities, including impacts to coral reefs, seagrass communities, mangroves, migratory birds, sea turtles, dugongs, Australian snubfin dolphins, diverse finfish communities, all reliant on healthy marine ecosystem.	These concerns are relevant to the functions, interests and activities of this individual and therefore have merit.	All potential impacts are described and assessed in Chapter 7 and risks are assessed in Chapter 8 of this EP. Proposed control measures are included in these chapters for each impact or risk identified.

Theme	Relevant persons	Objections and claims raised by relevant person	Assessment of merit of objections and claims	Measures adopted by EOG in response to objections and claims
Oil spill impacts	CCWA	Concerns were raised regarding the impacts from an unplanned spill event on environmental receptors surrounding the activity area. CCWA claim that a worst-case LoWC scenario "gives a maximum spill volume of 786,794 m^3, producing widespread and temporary reduction in water quality and sub-lethal to lethal toxicity impacts to marine life. The significant impacts from an unplanned oil spill from the Proposal would be unacceptable" and "given the high risk presented to the surrounding environment by the Proposal, a clean-up contingency plan is critical."	These concerns are relevant to the functions, interests and activities of this individual and therefore have merit.	Chapter 9 of this EP describes the potential hydrocarbon spill response strategies and set spill response environmental performance standards. The risks to the species and habitats within the areas claimed to be affected have been assessed as having 'low' to 'medium' residual risk rankings. The controls in place have reduced the risk to as low as reasonably practicable (ALARP). The Beehive-1 Drilling OPEP was accepted by NOPSEMA on 10 June 2024 for the Beehive-1 drilling campaign. Given that the loss of well containment scenario for the multi-well campaign remains the same as that for Beehive-1, there is no reason to ascertain that the accepted Beehive-1 OPEP is not suitable for the multi-well campaign.
	Wilderness Society	Concerns were raised regarding the impacts from an unplanned spill event on the marine environment and coastline. The Wilderness Society claimed that there was a lack of detailed local sourced data in the spill modelling and assessment of impacts. They also claim that "the capacity to carry out an emergency response to protect this environment goes little beyond booms in some circumstances and offshore aerial use of dispersant" and that "there is no ability to mitigate the impact of a moderate or large spill in this environment from potential sources so close to shore."	These concerns are relevant to the functions, interests and activities of this individual and therefore have merit.	The spill EMBA for the Beehive Multi-well Drilling campaign is the same as the Beehive-1 drilling campaign. **Appendix 13** (Oil Spill Trajectory Modelling Report) provides a comprehensive explanation of the methodology and data sets used to undertake spill modelling. The modelling meets the ASTM Standard F2067-13 "Standard Practice for Development and Use of Oil Spill Models".

Theme	Relevant persons	Objections and claims raised by relevant person	Assessment of merit of objections and claims	Measures adopted by EOG in response to objections and claims
Light emissions	CCWA	CCWA raised concerns that artificial light emissions from the Proposal present a high risk to threatened turtle species. CCWA requested that EOG avoid producing artificial light emissions between August and September, which is the peak nesting period for flatback turtles and also set curfews for artificial light at peak nesting times, such as after 8 pm.	These concerns are relevant to the functions, interests and activities of the CCWA and therefore have merit.	An assessment of the light management options for turtle nesting beaches from the National Light Pollution Guideline for Wildlife (DCCEEW, 2023) is included in Section 7.3 of this EP. The impacts to turtle species within the activity area from light emissions has been assessed as having a 'negligible' residual risk ranking. The controls in place have reduced the risk to ALARP.
Noise emissions	CCWA	CCWA raised concerns that the noise impact EMBA is unclear and that the cumulative risk of noise emissions should all sources run concurrently was not assessed in the Proposal. CCWA requested that EPBC Act Policy Statement 2.1 control measures be included in the EP.	These concerns are relevant to the functions, interests and activities of the CCWA and therefore have merit.	Section 7.5 of this EP provides the EIA for underwater sound. The EMBA for underwater sound is discussed in Section 7.5.3. Vertical seismic profiling (VSP) is described in Section 2.7.4 and is assessed in Section 7.5 of this EP. The control measures listed in Table 7.14 adopt certain controls from EPBC Act Policy Statement 2.1 for VSP activities. Section 7.5.4 of this EP includes an assessment of the environmental impacts from noise emissions. This assessment concluded that the drilling of three wells in succession would result in negligible cumulative underwater sound impacts.
Impacts to MNES from vessel movements	CCWA	Concerns were raised regarding the impact of increased ship movements from the Proposal having the potential to cause significant impact to MNES.	These concerns are relevant to the functions, interests and activities of the CCWA and therefore have merit.	Section 8.2 of this EP discusses the risk of vessel collision with marine megafauna. The risks to MNES species within the activity area from increased vessel movements have been assessed as having

Theme	Relevant persons	Objections and claims raised by relevant person	Assessment of merit of objections and claims	Measures adopted by EOG in response to objections and claims
				a 'negligible' residual risk ranking. The controls in place have reduced the risk to ALARP.
GHG emissions	CCWA	CCWA raised concerns that the full extent of environmental risks from the activity have not been assessed and that an estimate of Scope 3 emissions and their cumulative impacts should be provided for evaluation.	Scope 3 emissions are not relevant for the assessment of the activity as the wells are exploration wells that will noy be producing hydrocarbons for combustible use. There is therefore no merit to this claim.	All potential impacts associated with atmospheric emission are described and assessed in Section 7.4 of this EP. The impacts to the environment from atmospheric emissions has been assessed as having a 'negligible' residual risk ranking. The controls in place have reduced the risk to ALARP.
	Wilderness Society	The Wilderness Society claims that fossil fuel expansion is inconsistent with Australia's commitment to the Paris Agreement and limiting global temperature increases to 1.5 degrees Celsius. They have requested that Beach Energy should abandon this project and seek more responsible investments.	This claim refers to Beach Energy's activities and there is therefore no merit to this claim.	

4.2.6. Duty 6: Titleholder Responsiveness

As required by OPGGS(E) Regulation 24(b)(iii), titleholders must respond to each relevant person's objections or claims. The EOG consultation team manages all website content, in-person meetings and activities, written correspondence and phone calls to ensure that the consultation process is adequate and appropriate to targeted relevant persons, and that every claim and objection receives a response.

Feedback is handled via written correspondence and telephone contact. Written correspondence has been used to respond to enquiries and to request any remaining feedback that had not been previously addressed. Phone calls are used to maintain rapport and continue formal consultation with relevant persons, to confirm receipt of correspondence and offer opportunity to ask questions and clarify information provided through written correspondence and other media.

Appendix 8 provides a complete list of consultation undertaken with relevant persons and demonstrates that EOG has responded to all questions, objections and claims.

4.2.7. Duty 7: Consultation Shall Be Ongoing

Regulation 22(15) requires that ongoing consultation be incorporated into the Implementation Strategy of the EP. Based on the fact that EOG has executed in its entirety the methodology set forth in its RPCEP and fulfilled its requirements for the purposes of compliance with the OPGGS(E), relevant persons consultation has been fulfilled. However, titleholders are obligated to maintain ongoing consultation. Therefore, until the EP has been accepted by NOPSEMA and the project is completed, relevant persons can provide feedback to EOG. This section summarises how EOG is fulfilling this duty.

Ongoing Consultation Matters

EOG remains in ongoing consultation with multiple relevant persons.

At the time of EP submission, there are no outstanding issues to resolve as a result of stakeholder consultation.

4.3. Public Exhibition of the EP

In accordance with OPGGS(E) Regulations 28(1) and 30, NOPSEMA is publishing this EP (Revision 0) on the NOPSEMA website so that members of the general public can view and comment on the contents of this EP. Once published, the EP is available for a period of 30 days between 8 July 2024 and 7 August 2024. Table 4.3 lists the print media in which EOG placed advertisements so as to promote the availability of the EP in order to seek public comment.

The public exhibition process is another avenue in which to identify relevant persons. In the case of the public exhibition of this Beehive multi-well drilling EP (Rev 0) (8 July to 7 August 2024), three submissions were received. These were from the CCWA, who made five claims; the Wilderness Society, who made two claims and one individual who raised general concerns in response to the EP advertisement, but who had not reviewed the EP itself. These were addressed by EOG in the 'Titleholder Report', which is available on the NOPSEMA website, and summarised in Table 4.6.