

ENVIRONMENT PLAN

Beehive Multi-Well Exploration Drilling

10.Implementation Strategy

WA-488-P

16 December 2024

Rev 2

10. Implementation Strategy

The OPGGS(E) Regulation 22 requires that an Implementation Strategy be included in an EP. EOG retains full and ultimate responsibility as the Titleholder of the activity and is responsible for ensuring that the EPO and EPS outlined throughout Chapters 7, 8 and 9 are adequately implemented.

10.1. Activity Organisational Structure

Figure 10.1 illustrates the organisational chart for the activity and the relationship between EOG, the DMC, the MODU contractor and consultants for the activity.

EOG has overall responsibility for the management of the activity to ensure that:

- Design and execution of the activity is undertaken in accordance with industry accepted practice and legislated standards;
- All regulatory approvals are obtained prior to activity commencement;
- Contractors have been pre-qualified as having appropriate resources and equipment to undertake the activity and have appropriate systems in place to ensure that these activities are undertaken in accordance with all legislative requirements;
- The environmental impacts and risks of the activity are minimised and reduced to ALARP and environmental performance is monitored; and
- The day-to-day direction and oversight of work by contractors is undertaken in accordance with the accepted EP.

The MODU contractor will have the day-to-day control and management of the MODU through the Offshore Installation Manager (OIM) and the support vessels through the respective Vessel Masters. The OIM and Vessel Masters have overriding authority and responsibility to make decisions with respect to environment protection and pollution prevention and to request assistance as may be necessary.

Specific environmental roles and responsibilities are outlined in Table 10.1. These will be communicated to all personnel involved in the activity. As the Titleholder, EOG will enter into an agreement with the DMC to provide consulting services to support the planning and execution for drilling and appraising the Beehive wells.

EOG and the DMC will manage systems and procedures (outlined in Figure 10.2) to ensure that the well operation plans, operations preparations and operations activities carried out by the DMC on behalf of EOG are managed effectively with due regard for HSE and technical issues, quality assurance and cost effectiveness and the relevant statutory obligations.

10.2. Roles and Responsibilities

The environmental roles and responsibilities of key project team members are summarised in Table 10.1.

Day-to-day implementation of the activity (and the EP) will occur on the MODU under the leadership of the OIM, and for the support vessels under the leadership of the Vessel Masters. The DMC Project Manager will have oversight of the performance of the activity against the project plans, including this EP, and will initiate reviews and audits as required.

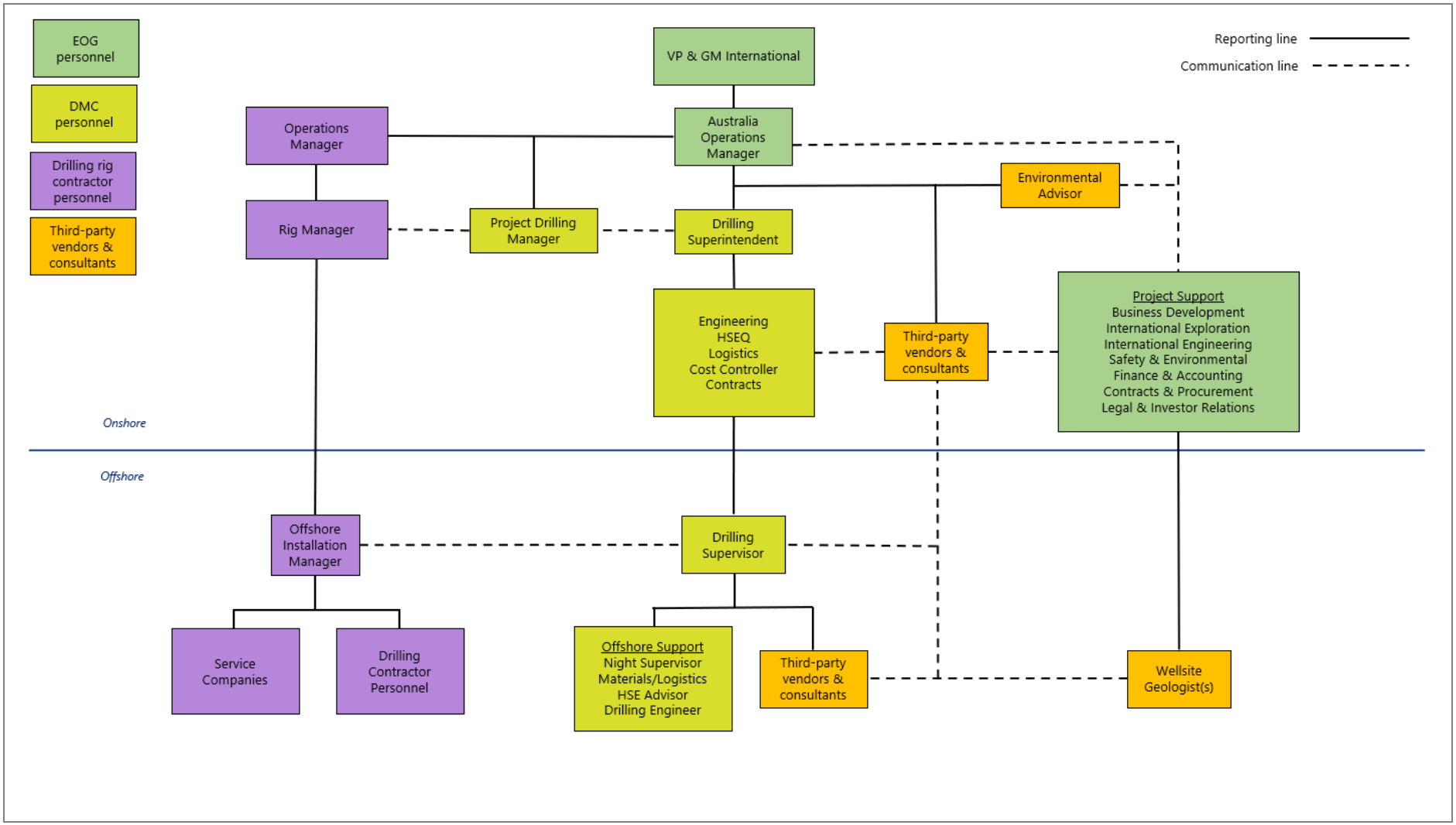


Figure 10.1. Activity organisation chart

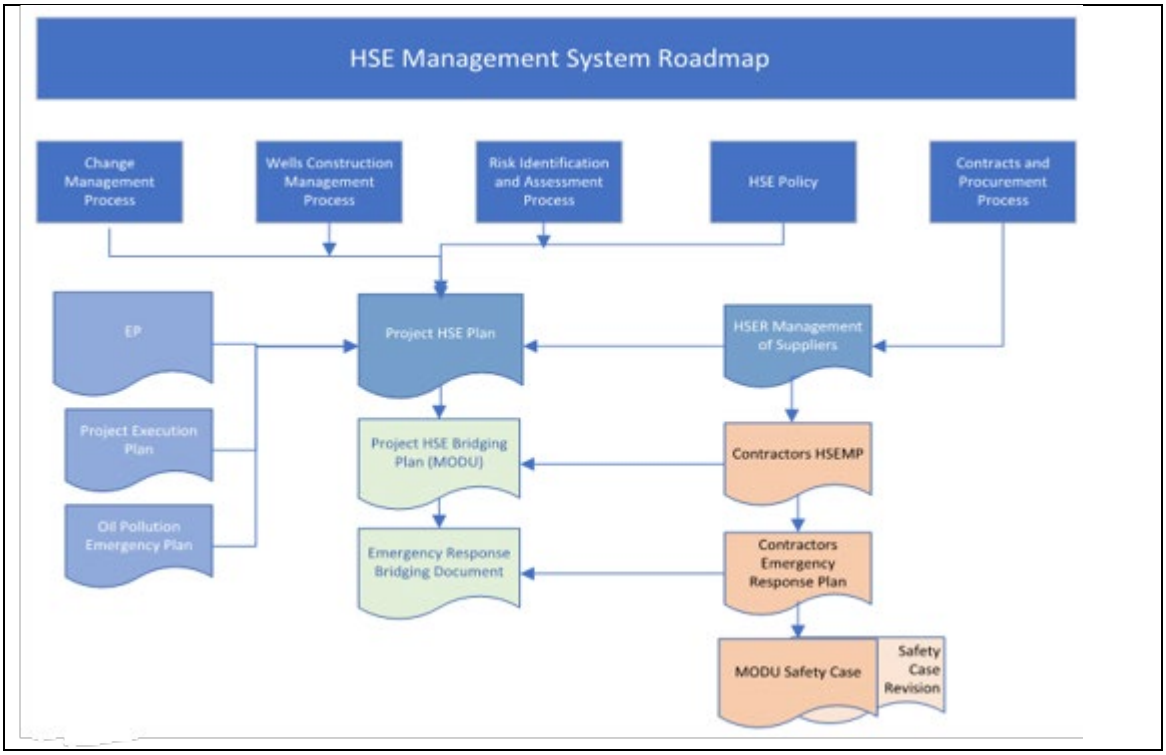


Figure 10.2. Beehive HSE management system roadmap

Table 10.1. Environmental roles and responsibilities for the activity

Role	Environmental responsibilities
Onshore	
EOG	
Vice President and General Manager – International	• Ensures EOG's standards are met. • Approves this EP for submission to NOPSEMA. • Ensures its contractors and consultants are adequately resourced to undertake the activity.
Vice President (Safety & Environment)	• Ensures EOG's Safety and Environmental Policy is applied to the activity.
Australia Operations Manager	• Overall project manager for the activities. • Works with the EOG team, as well as all contractors, to execute a safe and successful project. • Ensures EOG is adequately resourced to undertake the activities. • Ensures its contractors and consultants are adequately resourced to support the activities. • Liaises with the DMC and Aventus for guidance. • Attends operations meetings during the activity. • Reviews technical proposals to ensure compliance with industry best practice and EOG's Safety and Environmental Policy. • Reviews the Drilling EP, OPEP and OSMIP. • Confirms all required plans, audits and reviews are undertaken in accordance with the requirements of the EP and other regulatory documents. • Reviews and approves incident reports and submits them to regulators.

Role	Environmental responsibilities
	• Ensures all notifications are prepared and submitted in a timely fashion. • Reviews major changes to operations. • Reviews and submits the end-of-activity notification for submission to NOPSEMA. • Reviews and submits the Environmental Performance Report to NOPSEMA. • Approves submissions to NOPSEMA.
Project support	• Provides direction on stakeholder consultation. • Attends stakeholder meetings as required.
Specialists	
DMC Drilling Superintendent	• Reviews the Drilling EP, OPEP and OSMIP. • Ensures the correct selection, competence and training of individuals. • Ensures the WCMP is being followed, and verifies and signs off on well construction phases as complete. • Executes operations and is the key interface point between the DMC and MODU management onshore during operations. • Ensures MODU compliance with the EP. • Ensures effective emergency response arrangements are in place with the MODU. • Ensures all DMC, MODU and third-party contractor personnel are inducted and are aware of their activity-specific environmental responsibilities. • Ensures all required plans, audits and reviews are undertaken in accordance with the regulatory requirements and as required by the EP. • Promotes a proactive HSEQ culture within the DMC's operations and attendance at project HSE meetings. • Participants in onboard HSE incident investigations. • Provides daily feedback on operations progress to the EOG Australia Operations Manager. • Reports all incidents to the EOG Australia Operations Manager. • Ensures the DMC's drilling operations perform to the highest required standards of HSEQ. • Ensures full and complete HSE compliance with EOG requirements and government regulations. • Ensures the support vessels are appropriately inspected, certified and fit for purpose. • In the event of an emergency, assumes the role of DIMT Leader and activates the EOG Drilling Program Bridging Emergency Response Plan (ERP) to ensure the necessary onshore support is managed appropriately.
DMC HSEQ Manager	• Provides frontline HSEQ support and direction to management and all personnel for the project. • Ensures the activity complies with all applicable legislative, industry and corporate governance requirements. • Encourages the implementation of industry best practice and implements the DMC's management systems to achieve exemplary HSE performance. • Manages the preparation of the health and safety regulatory approvals documents (e.g., SCR and WOMP). • Provides technical input to risk analysis and evaluation techniques. • Arranges for review of the MODU and vessel contractors' HSE management systems upon contract award. • Reports recordable and reportable incidents to EOG. • Assists with review, investigation and reporting of HSE incidents.

Role	Environmental responsibilities
Aventus Environmental Advisory	• Prepares the EP, OPEP and OSMIP. • Provides technical input to stakeholder consultation. • Plans for the implementation of the EP. • Prepares the environmental induction. • Conducts EP compliance inspections/audits. • Monitors environmental performance against the EPS in this EP. • Assists with review, investigation and reporting of environmental incidents. • Provides incident support. • Reviews major changes to operations. • Alerts EOG ahead of any required notifications. • Prepares monthly recordable incident reports for submission to NOPSEMA. • Prepares the end-of-activity notification for submission to NOPSEMA. • Prepares the end-of-activity environmental performance report for submission to NOPSEMA.
Offshore	
MODU	
MODU OIM	• Responsible for the daily control and management of the MODU, has over-riding authority and responsibility to make decisions regarding environment protection and pollution prevention. • Responsible for all vessel activities within the PSZ around the MODU. • Oversees all work activities and work programs ensuring work is undertaken in accordance with procedures, work instructions and in compliance with the MODU Safety Case and Safety Case Addendum. • Assumes role of MODU ERT Leader. • Leads offshore HSE investigations. • Ensures all offshore personnel understand their obligations with respect to the management of HSE risks. • Ensures the MODU training matrix is fully implemented by all MODU crew. • Ensures MODU HSE inductions are conducted. • Ensures waste disposal complies with MARPOL requirements. • Monitors closeout of non-conformances, corrective actions and audit recommendations. • Reports all incidents, near-misses and dangerous occurrences to the drilling supervisor (DSV) in accordance with the incident reporting system.
DMC DSV	• Acts as EOG's Onboard Representative during the activity and ensures that commitments made in the EP are met. • Represents EOG onboard the MODU in all matters that affect EOG's commitment to HSE performance and ensures that the HSEQ and technical expectations are met. • Ensures inductions, auditing and reporting requirements are met. • Shares any design changes with the MODU OIM and rest of the onboard project team. • Encourages the principle of stop-work authority for safety. All personnel are encouraged to call a Time Out For Safety (TOFS) and to stop operations if there is a risk or any reasonable doubt about safety. • Ensures that the operation is halted in a safe manner to protect personnel, equipment and the environment prior to providing clarification and, if necessary, performing a risk assessment to identify mitigating plans in order to resume safe operations.

Role	Environmental responsibilities
	• Participates in HSE meetings and will be a member of the investigation team activated as the result of an accident or incident. Advises the Drilling Superintendent of any incidents. • Complies with all MODU rules, regulations, policies and procedures as defined within the Vessel Safety Case (and Addendum) and MODU ERP. • Undertakes a technical review of the activity. • Liaises with the DMC Drilling Superintendent to ensure compliance with drilling program requirements.
DMC HSE Coordinator	• Supports the DSV to ensure the execution of all HSE commitments under the HSE Plan, Safety Case (and Addendum), WOMP and EP. • Assists and advises on MODU risk assessments. • Participates in the MODU behavioural-based safety programs. • Conducts or participates in incident investigations as required. • Conducts HSE inspections. • Provides HSE technical support to the program and works with the MODU HSE Officer.
All MODU personnel	• Undertake work activities with reasonable care and in accordance with EP commitments to ensure no adverse impacts to the environment. • Report all new hazards, incidents, near-misses and dangerous occurrences to immediate supervisor as soon as possible. • Participate in the development of work procedures through the JSA process. • Attend all necessary toolbox talks, HSE inductions and HSE meetings. • Participate in workplace inspections. • Maintain high house-keeping standards.
Support vessels	
Vessel Master	• Complies with all applicable navigational safety standards and regulations. • Conducts emergency drills. • Supervises vessel crew to ensure they are fit for duty and undertaking work only within their area of qualification and training. • Monitors, reports and takes appropriate action to remedy any vessel or equipment defects that may impact on safety and environmental performance of the vessel. • Maintains logs of emissions and discharges in accordance with MARPOL regulations. • Ensures that all crew are appropriately qualified, trained and equipped for their roles on the vessel. • Reports all incidents and near-misses to the DSV, recording the details and taking initial actions with the Vessel Master to render the situation safe. • Keeps watch for megafauna and avoids direct interactions.
Vessel crew	• Undertake work activities with reasonable care and in accordance with EP commitments to ensure no adverse impacts to the environment. • Report all new hazards, incidents, near-misses and dangerous occurrences to immediate supervisor as soon as possible. • Participate in the development of work procedures through the JSA process. • Attend all necessary toolbox talks, HSE inductions and HSE meetings. • Participate in workplace inspections. • Maintain high house-keeping standards.

10.3. HSE Management

EOG will have overall responsibility for the management, review and audit of HSE issues during implementation of the activity, ensuring the activity is conducted safely and in accordance with corporate policies and procedures, as well as relevant Australian legislation and international standards.

10.3.1. EOG

EOG has in place an Australian Projects HSE Management Plan (996161-2022-Beehive#1-HSEPlan) that is aligned with ISO 14001:2016 (*Environmental Management Systems – requirements with guidance for use*), ISO 31000:2009 (*Risk management*), ISO 45001:2018 (*Occupational health and safety management systems*) and ISO 9001:2016 (*Quality management systems–requirements*) to guide the management of the activity. The HSE Plan includes descriptions of the following:

- Leadership and commitment – HSE objectives and performance monitoring, stop work authority;
- Organisation – roles and responsibilities, reporting;
- HSE legislation and standards – occupational, health and safety legislation;
- Risk management – risk management procedures and matrix;
- HSE competence and training – training and induction requirements;
- Subcontractors – pre-qualification process, management;
- Communications – meetings, record keeping and reporting, HSE awareness programs;
- Work instructions – permit to work system;
- Management of change;
- Incident management – recording and reporting procedures, investigation procedure, communicating lessons learned;
- Safety critical equipment and activities – safety critical equipment, working at heights, confined space, PPE requirements, hot work;
- Emergency response;
- Occupation health – medical facilities, infectious disease management (e.g., COVID-19), hygiene, smoking, fatigue management, drugs and alcohol, heat stress, mental health;
- Security – International Ship and Port Facility Security (ISPS) compliance, security alert levels, port security, third-party interference;
- Environmental management – EP compliance, waste management, spill prevention, preparedness and response, biosecurity, monitoring; and
- Audit and review – inspection and audit program.

The MODU and vessel contractors will be required to have an HSE management system or plan that meets the requirements of the EOG Safety and Environmental Policy and the EOG Australian Projects HSE Management Plan.

10.3.2. Drilling Management Consultancy

The management control framework used by the DMC for design and operations will meet best industry practice, involving a phased approach to defining the scope of work, pre-planning, contracts and logistics, detailed well design, readiness for start-up and operations and close out. This will be supported by continuous improvement activities such as risk management, change management and knowledge management.

Additional detail regarding the management control framework will be provided in the WOMP.

During the activity, should the DMC identify any new or increased environmental impacts and risks (that are not addressed in this EP), they will be communicated to EOG as soon as they are identified and addressed as part of the MoC (see Section 10.8) and risk management processes.

There will be daily meetings, DDRs, weekly meetings and weekly reports between the DMC and EOG management teams that keep all management personnel appraised of project issues (technical or HSE) as they arise.

10.4. Training and Awareness

10.4.1. Recruitment and Training

EOG contractor competency

Contractor management is detailed in the EOG Australian Projects HSE Management Plan. During its contractor selection process, EOG will conduct an HSE qualification to ensure that the MODU and support vessel contractors have procedures in place to ensure the correct selection, placement, training and ongoing assessment of employees.

Procedures will also be in place to identify the training needs of an individual to competently perform their role, and evidence of corporate and/or vessel inductions will also be required.

DMC personnel competency

The DMC selected by EOG will have an HSE Management System that describes how it manages the selection, competence and training of individuals and teams to carry on their work and associated risks. This includes staff, consultants, associates and third-party suppliers.

The management system will include guidance for all drilling and completions positions where the incumbent is required to undertake, supervise, review or verify critical tasks or where the incumbent has the technical authority to approve HSE and/or integrity-critical documents. Position-specific competence and training matrices are available for these roles and are used to guide and record assessments of skills.

The management system will also specify the planning, preparation, and chain of command regarding well control.

10.4.2. Environmental Induction

An activity-specific HSE induction for all personnel working on the activity will be undertaken. The environmental component of the induction will include information on the following environmental issues:

- Description of the environmental sensitivities, conservation and heritage values of the operational area and spill EMBA;

- Overview of the key control measures to be implemented;
- The importance of following procedures and using JSAs to identify environmental risks and mitigation measures;
- Procedures for responding to and reporting environmental hazards or incidents;
- Overview of emergency response and spill management procedures;
- Overview of the waste management requirements; and
- Roles and environmental responsibilities of key personnel aboard the vessel.

EOG will prepare the induction and the DSV is responsible for ensuring personnel receive this induction prior to the commencement of the activity. All personnel will be required to sign an attendance sheet to confirm their participation in and understanding of the induction.

The MODU and support vessel contractors will conduct their own company and vessel-specific inductions independently of the activity-specific HSE induction.

10.4.3. Oil Spill Response Training

Quarterly training of MODU and support vessel crews in SMPEP procedures is a MARPOL requirement for vessels over 400 GRT (Annex 1, Regulation 37).

During its contractor audit process, EOG will assess the vessel contractor's implementation of their SMPEPs (or equivalent, relevant to class).

An office-based desktop spill response exercise of the Beehive OPEP and bridging ERP will be conducted, involving key personnel from EOG, LPM, MODU and specialist third-party contractor personnel prior to or at the start of the activity.

10.4.4. Toolbox Talks and HSE Meetings

Environmental matters will be included in daily toolbox talks as required by the specific task being risk assessed (e.g., crane lifts).

Environmental issues will also be addressed in daily operations meetings and weekly HSE meetings, where department leads will participate with the DSV in discussing HSE matters that have arisen during the week, and issues to consider for the following week.

Records associated with environmental training, inductions and attendance at toolbox meetings will be recorded and maintained in respective company data servers.

10.4.5. Communications

The OIM, DSV and HSE Coordinator are jointly responsible for keeping personnel informed about HSE issues, acting as a focal point for personnel to raise issues and concerns, and consulting and involving all personnel in the following:

- Issues associated with the implementation of the EP;
- Any proposed changes to equipment, systems, or methods of operation of equipment, where these may have HSE implications; and
- Any proposals for the continuous improvement of environmental protection, including the setting of environmental objectives and training schemes.

Table 10.2 outlines the key meetings proposed to take place onshore and offshore during the activity.

Table 10.2. Activity communication meetings

Meeting	Frequency	Attendees
Onshore		
EOG Project Management	Daily	EOG Australia Operations Manager, DMC Drilling Advisor, Drilling Superintendent, DSV, HSEQ Manager, HSE Coordinator, Vessel Masters (if necessary)
Offshore		
Operations	Daily	OIM, Department heads, DSV, HSE Coordinator, Vessel Masters (if necessary)
Pre-start safety meeting	Daily, prior to each shift	All personnel on shift
Toolbox	Before each task	All personnel involved in the task
HSE	Weekly	All personnel
TOFS	As required, based on safety issues	All personnel

10.5. Environmental Emergencies and Preparedness

In the event of an emergency of any type, the MODU OIM (for the MODU) and Masters (for the support vessels) will assume overall onsite command and act as the ERT Leader. All personnel aboard the MODU and vessels will be required to act under the ERT Leader's directions.

The DSV will maintain communications with the Drilling Superintendent, who will become the overall DIMT Leader and activate the DIMT. The DIMT Leader will communicate with the EOG Australia Operations Manager who will implement the EOG Crisis Management Plan (CMP) if required, with support from the DIMT as required.

10.5.1. Adverse Weather Protocols

It is the duty of the MODU OIM and the support Vessel Masters to act as the focal point for all actions and communications with regards to adverse weather or sea state, to safeguard the vessel, all personnel onboard and the environment. During adverse weather, the MODU OIM and support Vessel Masters are responsible for the following:

- Ensuring the safety of all personnel onboard;
- Monitoring all available weather forecasts and predictions;
- Initiating the safety management systems, HSE procedures and/or ERPs;
- Keeping the DSV fully informed of the prevailing situation and intended actions to be taken;
- Assessing and maintaining security, watertight integrity and stability of the vessel; and
- Proceeding to identified shelter location(s) as appropriate.

Other appropriate responsibilities shall be taken into consideration as dictated by the situation.

In addition to using Very High Frequency (VHF) Marine Radio Weather Services, the MODU and support vessel contractor will obtain daily weather forecasting from the Bureau of Meteorology (BoM) and/or other suitable weather monitoring services to monitor weather within the operational area in the lead up to and for the duration of the activity.

10.5.2. Vessel Emergencies and Oil Spills

Activity-specific oil spill related emergency response procedures are included in the Beehive OPEP, Bridging ERP, RWP and MODU and support vessel SMPEPs. The Beehive Bridging ERP contains instructions for the MODU and support vessel emergency, medical emergency, search and rescue, reportable incidents, incident notification and emergency contact information that is specific to Beehive.

Vessel-specific SMPEPs and ERPs typically include vessel-specific procedures for the following:

- Vessel incidents – collision, grounding, hull damage, man overboard, equipment failure;
- Waste management;
- Hazardous materials and handling; and
- Hydrocarbon and chemical spills.

The SMPEP includes information about initial response, reporting requirements and arrangements for the involvement of third-parties having the appropriate skills and facilities necessary to respond effectively to oil spill issues. The SMPEP will be the principal working document for the MODU and support vessel crews in the event of a marine oil spill. This document will include specific emergency procedures including steps to control discharges for bunkering spills, hull damage, grounding and stranding, fire and explosion, collisions, vessel list, tank failure, sinking, and vapour releases. The SMPEP also includes requirements for regular drills of the plan and revision following drills or incidents.

The Beehive OPEP will be implemented in the event of a Level 2 or 3 hydrocarbon spill that requires response resources beyond those immediately available to the MODU and support vessels. Oil spill emergency response for this activity is detailed in the Beehive OPEP.

10.5.3. Emergency Response Training

The readiness and competency of EOG, LPM, the MODU and support vessel contractors to respond to incidents and emergencies will be tested by conducting a desktop emergency response exercise as close immediately prior to or soon after the activity commences.

A scenario will be chosen that combines an emergency with risk to human life (such as fire) and risk to the environment (large hydrocarbon spill). This way several plans (i.e., the ERP and OPEP) can be tested simultaneously. This exercise has the objectives of:

- Developing and testing the response arrangements as outlined in the emergency response procedures;
- Ensuring the skills and teamwork of the DIMT and ERT to respond to major emergency events are up-to-date. In particular, ensuring individual roles, responsibilities and reporting requirements are understood;
- Testing interfaces between all key parties involved in emergency response (EOG, DMC, MODU and support vessel contractors); and

- Ensuring the correct communications are known and used and that contact details (e.g., phone numbers) are correct.

This exercise will be facilitated by an experienced facilitator. At the completion of the exercise, the facilitator will hold a debrief session during which the exercise is reviewed, and lessons learned and areas for improvement are identified.

Any learnings, findings or recommendations identified as part of the testing exercise will be addressed and incorporated into the relevant emergency response plans and procedures to ensure they remain effective.

MODU-specific training

The MODU OIM is responsible for ensuring that personnel fulfilling emergency response roles are competent in crisis and emergency procedures related to the protection of HSE and integrity. The level of training and associated competency demonstration is dependent on individual roles in a crisis or emergency situation in accordance with the MODU's personnel training and qualifications matrix. This includes identification and development of approved competency and non-competency-based courses, and ensuring training is undertaken to schedule and records are maintained.

10.5.4. Underwater Cultural Heritage Unexpected Finds Procedure

In the event of the discovery of what appears to be UCH, the following Unexpected Finds Procedure (as per **IMP-01: EPS-09 & EPS-10** in Section 7.1.5) will apply:

- All activities with the potential to impact the suspected UCH must cease immediately. Retain all records of the potential UCH including any images, description and location.
- Person who discovers the heritage object must inform the EOG Onboard Representative.
- EOG Onboard Representative must notify EOG's Historical & Cultural SME.
- EOG will specify an appropriate buffer around the potential UCH, taking into consideration the nature and scale of the potential UCH and the activities to be managed.
- No seabed disturbance may occur within the buffer area around the potential UCH until approved by EOG's Historical & Cultural SME.
- EOG's Historical & Cultural SME must notify a qualified maritime archaeologist and provide all available documentation of the potential UCH.
- If the potential UCH appears to be Aboriginal, EOG's Historical & Cultural SME must notify the appropriate Traditional Custodians to determine whether it is a heritage site and if so, how the site should be managed.
- If the potential UCH appears to be a shipwreck or aircraft that has been wrecked for more than 75 years, or is otherwise reportable under Section 40 of the UCH Act, EOG's Historical & Cultural SME must notify the Minister responsible for the UCH Act, the DCCEEW underwater archaeological section through the Australasian Underwater Cultural Heritage Database, and the WA Museum.
- If the suspected heritage object includes human remains, EOG's Historical & Cultural SME must also notify:

- The Australian Federal Police (phone: 131 444) of the location of the remains, that the remains are likely to be historic or Aboriginal in origin, and that it may be appropriate that Traditional Custodians and a maritime archaeologist are present during any handling of the remains.
- The Office of the Commonwealth Environment Minister in accordance with Section 20 of the *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* (ATSIHP Act).

- Work must not recommence in the vicinity of the heritage object until EOG's Historical & Cultural SME provides written approval. EOG's Historical & Cultural SME must only provide written approval once agreed management measures are implemented consistent with approvals and legislation or where the potential UCH is confirmed to not be UCH (e.g., a permit to disturb UCH under Section 30 of the UCH Act may be required).

10.5.5. Fisheries Compensation Protocol

As noted in Section 7.2 of the EP (IMP-02; EPS-04), EOG has developed an FCP that sets out EOG's commitments to minimising impacts to commercial fishers from its temporary offshore exploration activities and EOG's approach to financial compensation where impacts cannot be minimised or eliminated.

A summary of the FCP is provided in **Appendix 9.** This section, and specifically Table 10.3, summarises how EOG intends to effectively administer and implement the protocol.

Table 10.3. Summary of the Fisheries Compensation Protocol

Protocol aspects	Details
Persons eligible for submitting claims	Commercial fishers are eligible to submit claims. Section 6 of the FCP notes that commercial fisheries with licences to operate in the activity area are the: • Northern Prawn Fishery (Commonwealth); • Northern Demersal Scalefish Managed Fishery (WA); and • Mackeral Managed Fishery (Area 1 – Kimberley) (WA). It is therefore expected that any claims lodged would be most likely to originate from fishers licenced to operate in these fisheries, though other fisheries would not be excluded from making a claim.
Process and timeframes for communicating with commercial fishers about the FCP	During the consultation process for the Beehive-1 drilling campaign, EOG has provided relevant persons with information on control measures that will be implemented, including the availability of the FCP. The FCP has been listed as a control measure in the EP since Revision 4 (October 2023), which has been available on the NOPSEMA and EOG websites for relevant persons to read for about 6 months. Relevant persons, including commercial fisheries representative bodies and individual fishers, have also been made aware of the FCP via project information distributions and the summary FCP that has been available on the EOG website since May 2023 (with EOG directing relevant persons to this summary in correspondence in May 2023).

Protocol aspects	Details
	Section 4 of the FCP, in addition to Section 10.10.2 of this EP, commits to notifying commercial fishers ahead of EOG offshore activities. This will take the form of a project update to relevant persons. As part of pre-activity notifications, EOG will make commercial fisheries representative groups and individual fishers aware of the availability of the FCP and advise them that it is available upon request. Requests for the FCP will also be honoured during the activity and after.
Spatial and temporal extent of the compensation area	Spatially, Section 4 of the FCP notes that EOG's operational areas will be small in comparison with very large fishing zones. Section 8 of the FCP states that claims must relate to a period of time in which the claimant and EOG were undertaking concurrent activities.
Process for assessing claims and for resolution of disagreements on claim assessments	Section 9 of the FCP describes the claims lodgement procedure. Claims will need to be supported by catch and effort evidence and will use best endeavours to approve claims within 60 days of the commercial fisher signing EOG's Settlement Agreement. Trained, competent and independent personnel will be available through an external claims management consultant, will be engaged by EOG at least one month prior to spud. Section 10 of the FCP describes the process for managing disagreements. Where disagreements occur, EOG will seek agreement with the commercial fisher to refer the matter to an independent mediator that EOG will pay for.
Evidence required to support claims	Schedule A of the FCP provides a series of claim forms for various claims scenarios (reduction in catch, displacement and fishing gear loss or damage). One of these must be completed by the commercial fisher and submitted to EOG In order to progress a claim. The claim forms request the following information: • Reduction in catch – months of catch reduction, market prices, catch and effort information for the period in question. • Displacement – evidence of fuel and crew costs for relocation of fishing effort, catch and effort information for the period in question. • Fishing gear damage or loss – details on when, where and how gear damage or loss occurred, name and details of relevant vessel/s, and at least one quote for the repair or replacement of the damaged or lost equipment.
Nature of the content to be included in a claim assessment report	The external claims management consultant will prepare a report in line with relevant industry practice to determine the validity of the claim, which will comment on the credibility of the lodged claim using independent data (where possible), and ultimately provide a recommendation on whether the claim should be paid.
Timeframes for making, submitting and resolving claims and disagreements	The following timeframes are specified throughout the FCP: • Submission of claims – no later than 6 months after the event (FCP Section 9). • Resolution of claims – within 60 days of receiving a claim with the necessary evidence (FCP Section 9). • Payment of accepted claims – within 60 days of receiving a signed Settlement Agreement (FCP Section 9). • Submission of disagreements on claim assessments – within 6 months of receipt of assessment outcome (FCP Section 10).

Protocol aspects	Details
	• Resolution of disagreements on claim assessments – within 6 months of lodging disagreement on claim assessment (FCP Section 10).

10.6. Simultaneous Operations

Simultaneous operations (SIMOPs) refer to two or more operations occurring simultaneously in the same area that have the potential to interfere with each other. The activity area is located 13 km from the Blacktip unmanned wellhead platform and 7 km from the Blacktip gas export pipeline at its closest point, operated by Eni Australia. At this distance, it is not expected that SIMOPs will be an issue. EOG will remain in contact with Eni Australia so that SIMOPs issues can be addressed if and as required.

10.7. Incident Management

10.7.1. Recordable Incident Management

Regulation 5 of the OPGGS(E) regulations defines a 'recordable' incident as:

> *A breach of an EPO or EPS in the EP that applies to the activity that is not a reportable incident.*

Routine monthly recordable incident reports, including 'nil' incident reports, will be submitted by EOG to NOPSEMA by the 15th of each month. These are reported using the NOPSEMA template *Monthly environmental incident reports* (N-03000-FM0928). Table 10.4 summarises the recordable incident reporting requirements.

Table 10.4. Recordable incident reporting details

Timing	Reporting requirements	Contact
By the 15th of each month	• All recordable incidents that occurred during the previous calendar month. • The date of the incident. • All material facts and circumstances concerning the incidents that the operator knows or is able to reasonably find out. • The EPO and/or EPS breached. • Actions taken to avoid or mitigate any adverse environmental impacts of the incident. • Corrective actions taken, or proposed to be taken, to stop, control or remedy the incident. • Actions taken, or proposed to be taken, to prevent a similar incident occurring in the future. • Actions taken, or proposed, to prevent a similar incident occurring in the future.	NOPSEMA – submissions@nopsema.gov.au

10.7.2. Reportable Incident Management

Regulation 5 of the OPGGS(E) defines a 'reportable' incident as:

> *An incident that has caused, or has the potential to cause, moderate to significant environmental damage.*

In the context of the EOG Environmental Risk Matrix, EOG interprets 'moderate to significant' environmental damage to be those hazards identified through the EIA and ERA process (see

Chapters 7, 8 and 9) as having an inherent or residual impact consequence of 'moderate' or greater. Impacts and risks with these ratings are:

- Introduction of IMS;
- Death or injury of threatened or migratory megafauna resulting from vessel collision;
- MDO spill; and
- LoWC.

Table 10.5 presents the reportable incident reporting requirements.

Table 10.5. Reportable incident reporting requirements

Timing	Requirements	Contact
Verbal notification		
Within 2 hours of becoming aware of incident	• The verbal incident report must include: • All material facts and circumstances concerning the incident that the titleholder knows, or is able, by reasonable search or enquiry, to find out; • Any actions taken to avoid or mitigate any adverse environmental impacts of the reportable incident; and • The corrective action that has been taken, or is proposed to be taken, to stop, control or remedy the reportable incident.	• NOPSEMA – 1300 674 472
	Level 2 or 3 vessel spills that threaten WA or NT waters	• WA DoT – (08) 9480 9924 • NT – 1800 064 567 • WA DMIRS - 0419 960 621 • ISWAG (via the Kimberley Land Council) – 08 9194 0100 (Broome office) or 08 9194 0190 (Kununurra office)
	For Level 2 or 3 hydrocarbon spills in Commonwealth waters.	As above, plus: • AMSA – 1800 641 792
	Oiled wildlife	• WA – (08) 9219 9108 • WA DBCA marine emergencies – (08) 9474 9055 • NT – 1800 064 567
	Suspected or confirmed IMS introduction	• WA Fisheries – 1800 815 507 • DCCEEW - 1800 803 772 (general enquiries)
	Injury or death of EPBC Act-listed fauna (e.g., vessel collision)	• DCCEEW – 1800 803 772
	Level 2 or 3 hydrocarbon spills that are likely to impact on an AMP	• DNP - 0419 293 465
	Near-miss or incident with DoD vessel or aircraft or UXO	• DoD – 02 5109 8232 (Directorate of Property Interests & Acquisition) or 1300 333 362 (general switchboard)

Timing	Requirements	Contact
Within 24 hours of discovery	Notify DCCEEW if previously unrecorded underwater cultural heritage (e.g., shipwreck) is found	Submit report at the following address: http://www.environment.gov.au/shipwreck/public/forms/notification.do;jsessionid=7DF6B6DBCFD9E9E1071EB71DC201B84C?mode=add.
Written notification		
Not later than 3 days after the first occurrence of the incident	A written incident report must include: • All material facts and circumstances concerning the incident that the titleholder knows, or is able, by reasonable search or enquiry, to find out; • Any actions taken to avoid or mitigate any adverse environmental impacts of the reportable incident; • The corrective action that have been taken, or is proposed to be taken, to stop, control or remedy the reportable incident; and • The action that has been taken, or is proposed to be taken, to prevent similar recordable incidents occurring in the future.	• NOPSEMA – submissions@nopsema.gov.au
Within 72 hours of the incident	As above, with regard to details of a vessel strike incident with a cetacean	• Upload information to DCCEEW online National Ship Strike Database (https://data.marinemammals.gov.au/report/shipstrike)
Within 7 days of the incident	As above, with regard to impacts to MNES, specifically injury to or death of EPBC Act-listed species	• EPBC.Permits@environment.gov.au
Within 7 days of providing written report to NOPSEMA	As above	• NOPTA – reporting@nopta.gov.au

10.7.3. Incident Investigation

Any non-compliance with the EPS outlined in this EP will be investigated by EOG and follow-up action will be assigned as appropriate. The findings and recommendations of inspections, audits and investigations will be documented and distributed to relevant MODU, support vessel and onshore project personnel for review. Tracking the recommendations and close-out actions arising from incident investigations will be managed via either the MODU, support vessel, DMC or EOG management systems, depending on the location and nature of the incident.

Investigation outcomes will be communicated to the project team via daily operations meetings and to the MODU and support vessel crew during daily toolbox meetings and at weekly HSE meetings.

10.7.4. Routine Recording and Reporting

Routine reporting of HSE matters will be provided via the meetings listed in Table 10.2. The DDR will report on HSE matters, including environmental issues, incidents and near-misses.

10.8. Management of Change

A Management of Change (MoC) process is important to ensure that all changes to the project planning, design or operations are evaluated for their potential consequences on other elements of the activity.

This section describes the EOG MoC processes and their interactions.

10.8.1. EOG

EOG's Australian Projects HSE Management Plan outlines the MoC procedure for the activity. The MoC procedure will be used to determine whether any changes to the design of the activity (or other factors) trigger revisions to the EP that require re-submission to NOPSEMA (see Section 10.10.3).

Permanent or temporary changes to organisation, equipment, plant, standards or procedures that have potential HSE and/or integrity impacts are subject to formal review and approval by the relevant EOG role with responsibility for the change prior to initiating the change to ensure risks remain acceptable and are reduced to ALARP. The level of management approval for each change is commensurate with the risk.

An MoC form must be completed. This is then reviewed by relevant specialists that have technical and project-specific knowledge and understanding to determine the impact (if any) and significance of the change. The relevant role with responsibility for the change shall look at any additional safety requirements needed to ensure the safety of personnel, the effect on schedule and cost, the effect on equipment and third-party assets and then decide whether to approve or reject the change. The results of the review will then be documented in the MoC form and the relevant role will communicate the change to all those who may be affected by it, including the DMC. The MoC form will then be stored by EOG in the MoC register.

For DMC-documented programmes and procedures, the DMC MoC process will be used and signed off as required by EOG. For EOG documents (e.g., well data information), the EOG process will be used. For changes that affect the policies and standards of the MODU contractor, the MODU contractor's MoC will also be required.

The DMC MoC procedure will be applied to all changes and deviations for the activity after the approval of the Detailed Drilling Program, until the completion of activity.

10.8.2. DMC

The DMC will have an MoC procedure as part of their management system. Deviations from processes, policies and procedures shall be managed through the MoC procedure.

Iterating designs, programmes and risk assessments is a key part of work during the planning stage, and this does not require MoC procedures. However, the design work is based on key input data and scope requirements. MoC procedures need to be applied to changes in input data and scope, to ensure that the impacts of such changes are adequately managed. Examples of change include, but are not limited to:

- Changes in the subsurface input data or geological prognosis for example pore pressure change, well/target location, move to HP or HT, changes to metallurgy;
- Changes to the agreed basis of well design;

- Changes in project schedule that affect ability to secure and mobilise materials and deliver the planning work in time for the well spud;
- Changes in the requirements of regulatory bodies; and
- Deviations from the well construction management process or relevant policy and procedure.

Depending on the level of change or deviation, a risk assessment process for evaluating the potential risks must be carried out, and the change or deviation must be adequately documented and authorised by the DMC and EOG management.

All parties will ensure adequate consultation and involvement of all affected parties in any MoC related processes. The Drilling Superintendent and Senior Drilling Engineer are responsible for ensuring that all hazards associated with such changes are identified, highlighted, and controlled.

10.9. Record Keeping

In accordance with Regulations 52 and 53 of the OPGGS(E), documents and records relevant to the implementation of this EP are stored and maintained by EOG for a minimum of five years. These records will be made available in electronic or printed form upon request.

10.10. Assurance, Reporting and Review

10.10.1. Field Environmental Monitoring

EOG will maintain a quantitative record of emissions and discharges, and other environmental matters generated on location during the activity, as required under Regulation 22(6) of the OPGGS(E).

The MODU and support vessel contractors are responsible for collecting this data and reporting it to the DSV. This is facilitated by completing a daily environmental monitoring register that will be provided by EOG to the contractors, which captures the commitments made in Table 10.6.

Table 10.6. Summary of environmental monitoring requirements

Aspect	Monitoring parameter	Frequency	Record
Impacts			
Underwater sound	Megafauna observations	During VSP	Megafauna observation register
Atmospheric emissions	Fuel consumption	Tallied at end of activity from DDRs	DDRs
Drill cuttings and muds	Chemicals used in the mud system	Daily	DDR Daily mud report
	Volume of muds discharged overboard		
	Observations of the separation treatment system.	Continuous during activity	DDR Daily mud report
Cement	Real-time ROV observations	During conductor cementing operations	DDR
	Chemical additive use	As required	Daily cement report
Displacement of other marine users	Ongoing patrol for, and communications with, third-party vessels	Continuous during activity	Bridge communications book

Aspect	Monitoring parameter	Frequency	Record
Bilge water	Volume of bilge water discharged during the activity	Each discharge (infrequent)	Oil record book
Risks			
Waste disposal	Weight/volume of wastes sent ashore (including oil sludge, solid/hazardous wastes)	Tallied at end of activity	Waste manifest
Dropped objects	Type, location, quantity.	Each event	Incident report DDR
Displacement or interference with other marine users	Ongoing patrol for, and communications with, third-party vessels	Continuous during activity	Bridge communications book
Introduction of IMS to activity area	Volume and location of ballast water discharges noted	Each discharge	Ballast water log
Vessel strike or entanglement with megafauna	Megafauna observations	Continuous while in operational area	Incident report DDR
Hydrocarbon or chemical spill	Volume, type	Each event	Incident report DDR
MDO spill	Operational monitoring in line with the OPEP and scientific monitoring in line with the OSMP (depending on spill volume)	As required	Incident reports
LoWC	BOP function testing	Every 7 days	BOP testing reports
	BOP pressure testing	Every 21 days	
	Well casing pressure testing	After installation	Well casing pressure test reports

10.10.2. Routine Reporting and Notifications

Regulation 25 of the OPGGS(E) specifies that consultation with relevant authorities, persons and organisations must take place. This consultation includes an implicit obligation to report on the progress of the activity. Table 10.7 outlines the routine reporting obligations that EOG will undertake with external organisations.

Table 10.7. External routine reporting obligations

Requirement	Timing	Contact details	OPGGS(E) regulation
Pre-activity			
Notify the DoD of the activity commencement date.	5 weeks prior to activity starting.	Offshore.Petroleum@defence.gov.au.	25
Notify the AHO of the activity commencement date and duration to enable Notices to Mariners to be issued.	3 weeks prior to activity starting.	datacentre@hydro.gov.au	25

Requirement	Timing	Contact details	OPGGS(E) regulation
Notify all other stakeholders in the stakeholder register with the activity commencement date.	2 weeks prior to activity starting.	Via email addresses in the stakeholder consultation register	25
Notify NOPSEMA with the activity commencement date.	At least 10 days prior to activity starting.	submissions@nopsema.gov.au	54
Notify AMSA in order to issue daily AusCoast warnings.	Within 24 hours of activity starting.	rccaus@amsa.gov.au	25
Activity completion			
Notify AMSA in order to cease daily AusCoast warnings.	Within 24 hours of activity completion.	rccaus@amsa.gov.au	25
Notify all stakeholders in the stakeholder register.	Within 2 days of activity completion.	Via email addresses managed by the Environment Advisor	25
Notify the AHO in order to cease the issuing of Notices to Mariners.	Within 2 days of activity completion.	datacentre@hydro.gov.au	25
Notify NOPSEMA of the activity end date.	Within 10 days of activity completion.	submissions@nopsema.gov.au	54
Notify NOPSEMA of the end of the operation of the EP.	After acceptance of the end-of-activity EP performance report.	submissions@nopsema.gov.au	46
Performance reporting			
Submit an end-of-activity EP Performance Report.	Within 3 months of activity completion.	submissions@nopsema.gov.au	51
Provide marine fauna observation data to the DCCEEW.	Within 3 months of activity completion.	Upload via the online Cetacean Sightings Application at: https://data.marinemammals.gov.au/nmmdb	N/A – EPBC Act

10.10.3. Environment Plan Review

EOG may determine that an internal review of the EP is necessary based on any one or all of the following factors:

- Changes to hazards and/or controls identified in the review of the EP, which in itself is supported by:
    - Reviewing changes to AMP management arrangements (through subscription to the AMP email update service at https://parksaustralia.gov.au/marine/about/).
    - Environment and industry legislative updates (through subscriptions to NOPSEMA, AEP and legal firms).

- Running a new EPBC Act PMST for the impacts and/or spill EMBA to determine whether there are newly-listed threatened species or ecological communities in the EMBAs.
- Remaining up to date with new scientific research that may impact on the EIA/ERA in the EP (for example, through professional networking and AEP membership).
- Remaining in regular contact with relevant persons.

- Implementation of corrective actions to address internal or external inspection or audit findings;
- An environmental incident and subsequent investigation identifies issues in the EP that require review and/or updating;
- A modification of the activity is proposed that is not significant but needs to be documented in the EP;
- Changes identified through the MoC process, such as hazards or controls, organisational changes affecting personnel in safety critical roles; and
- Changes to any of the relevant legislation.

The EOG Australia Operations Manager will seek advice on the material impact of the items listed above and whether or not a review of the EP should be undertaken. The scope of a review is determined by the factors that trigger the review and an appropriate team will be assembled by EOG to conduct the review.

If a review of the EP relates to a topic that had previously been raised by a relevant person or stakeholder, an updated response will be prepared and provided to affected stakeholders in a process managed by Aventus for EOG.

Revisions Triggering EP Re-submission

EOG will revise and re-submit the EP for assessment as required by the OPGGS(E) regulations listed in Table 10.8.

Table 10.8. EP revision submission requirements

Regulations	OPGGS(E) regulation
Submission of a revised EP before the commencement of a new activity	38
Submission of a revised EP when any significant modification or new stage of the activity that is not provided for in the EP is proposed	39
Submission of a revised EP before, or as soon as practicable after, the occurrence of any significant new or significant increase in environmental impact or risk not provided for in the EP	39
Submission of a revised EP if a change in titleholder will result in a change in the manner in which the environmental impacts and risks of an activity are managed	39

Revisions and re-submission of the EP generally centre around ‘new’ activities, impacts or risks and ‘increased’ or ‘significant’ impacts and risks. EOG defines these terms in the following manner:

- **New** impact or risk – one that has not been assessed in Chapters 7, 8 or 9.
- **Increased** impact or risk – one with greater extent, severity, duration or uncertainty than is detailed in Chapters 7, 8 or 9.

- **Significant** change –
    - The change to the activity design deviates from the EP to the degree that it results in new activities that are not intrinsic to the existing Activity Description in Chapter 2.
    - The change affects the ability to achieve ALARP or acceptability for the existing impacts and risks described in Chapters 7, 8 or 9.
    - The change affects the ability to achieve the EPO and EPS contained in Chapters 7, 8 and 9.

A change in the activities, knowledge, or requirements applicable to the activity are considered to result in a 'significant new' or 'significant increased' impact or risk if any of the following criteria apply:

- The change results in the identification of a new impact or risk and the assessed level of residual impact consequence is higher than 'minor' or the residual risk rating is higher than 'low';
- The change results in the identification of a new impact or risk and the assessed level that is not acceptable and ALARP;
- The change results in an increase to the assessed impact consequence or risk rating for an existing impact or risk described in Chapters 7, 8 and 9; and
- There is both scientific uncertainty and the potential for significant or irreversible environmental damage associated with the change.

While an EP revision is being assessed by NOPSEMA, any activities addressed under the existing accepted EP are authorised to continue. Additional guidance is provided in NOPSEMA Guideline *When to submit a proposed revision of an EP* (N04750-GL1705, NOPSEMA 2020h).

Minor EP Revisions

Minor revisions to this EP that do not require resubmission to NOPSEMA will be made where:

- Minor administrative changes are identified that do not impact on the environment (e.g., document references, contact details, etc.); and
- A review of the activity and the environmental risks and impacts of the activity do not trigger a requirement for a revision, as outlined in Table 10.7.

Minor revisions to the EP will not be submitted to NOPSEMA for assessment.

10.10.4. Inspections and Audits

Various inspections and audits will be undertaken for the activity using competent personnel, as outlined in Table 10.9. Any non-compliances or opportunities for improvement identified at the time of an inspection or audit will be communicated to the relevant EOG and contractor personnel at the time of the inspection or audit. These are tracked by EOG, which includes assigning responsibilities to personnel to manage the issue and verify that it is closed out.

A summary of the EP commitments for the activity will be distributed to the DSV and support vessel management and implementation of the EPS will be continuously monitored by EOG through review of the completed weekly checklists and attendance at relevant meetings.

Non-compliances and/or opportunities for improvement will be communicated to the EOG Australia Operations Manager in writing and at appropriate meetings.

Table 10.9. Summary of environmental inspections and audits

Type	When	Frequency	Method	Details
HSE due diligence inspection	Post-award, pre-activity	Once	Desktop or in port/during mobilisation	Focused on ensuring HSE Plan and EPS in this EP can be met through review of relevant records and databases.
EP compliance audit	During drilling	Once	In person on board the MODU	A suitably experienced auditor will assess compliance against the EPS for key drilling matters (e.g., cuttings and muds, cementing, LoWC) through interviews, observations and review of databases and records.
Ongoing inspections	During activity	Weekly	In person on board	Checklists to be completed by the HSE Coordinator.

10.10.5. Regulatory Inspections

Under Part 5 of the OPGGS Act, NOPSEMA inspectors have the authority to enter EOG premises, including the MODU, to undertake monitoring or investigation against this EP. EOG will cooperate fully with the regulator during such investigations.

10.10.6. End of Activity Performance Report

In accordance with the OPGGS(E) Regulation 22(7), EOG will submit an end-of-activity EP performance report to NOPSEMA within three months of completion of the activity. Performance will be measured against the EPO and EPS outlined in Chapters 7 and 8 (and Chapter 9, if triggered). The information in the report will be based on the information collected during routine communications, inspections and audits, as outlined in this chapter.

10.10.7. Monitoring and Review

The MODU and support vessel contractors will have specific contractual compliance obligations associated with implementing the EP and other project plans. EOG will monitor the contractors against these obligations both in terms of deliverables and quality.

EOG will establish, maintain and review an EP commitments register to assist in monitoring against these EP. Learnings from this monitoring will inform continued operations and the development of EPs for future phases (if any) of the Beehive project.

10.11. Summary of Implementation Strategy Commitments

Table 10.10 summarises the commitments provided throughout the Implementation Strategy by assigning EPO, EPS and measurement criteria to each commitment.

Table 10.10. Summary of EP implementation strategy commitments

Section	EPO	EPS	Measurement criteria
10.4.1	Project personnel are trained and competent to fulfil their duties.	The Australian Projects HSE Management Plan records and tracks core and critical HSE and technical compliance training.	Training records are readily accessible through.
		Due diligence is undertaken on contractors to ensure they are	Contractor due diligence reports are readily available

Section	EPO	EPS	Measurement criteria
		competent to work on the activity.	and verify their suitability to work on the activity.
10.4.2	Project personnel are familiar with their HSE responsibilities.	All personnel working on the MODU and support vessels are inducted into the activity-specific HSE requirements.	Vessel crews and visitor lists, along with induction familiarisation checklists are readily available, verifying that all personnel working on and visiting the MODU and support vessels are inducted.
10.4.2, 10.4.3 & 10.4.6	Project personnel are familiar with operations HSE issues.	Regular HSE communications take place between offshore and office-based personnel.	HSE meeting records are available and verify regularity of communications.
10.5.2	Emergency response responsibilities are clearly defined.	The Australian Projects HSE Management Plan, OPEP, RWP and Bridging ERP outline emergency responsibilities for project personnel.	The emergency responsibilities are communicated to project personnel prior to the activity commencing.
10.5.2	Offshore and onshore project personnel are familiar with their emergency response responsibilities.	All relevant MODU-, vessel- and office-based personnel participate in emergency response (e.g., ERP and OPEP) training, drills and exercises.	Training records verify that emergency response exercises were undertaken.
10.5.5	EOG administers and implements the FCP in a manner such that compensation is provided in a timely manner	Compensation is provided within 60 days of receiving a commercial fisher's signed settlement agreement (per Section 9 of the FCP) in response to any evidence-based claims for compensation that have merit.	Claims correspondence and payment date verifies that compensation payments are paid within 60 days of receiving a commercial fisher's signed settlement agreement.
10.7.1 & 10.7.2	Incident reports are issued to the regulators as required.	Recordable incidents reports are issued monthly to NOPSEMA as per Table 9.4.	Recordable and reportable incident reports and associated email correspondence is available to verify their issue to NOPSEMA (and other agencies, as required).
		Reportable incidents are reported to NOPSEMA in accordance with the timing requirements provided in Table 9.5.	
10.7.3	Incidents are investigated.	Incident investigations are undertaken by suitably qualified and experienced personnel in a timely manner.	Incident investigation reports are available and align with incidents recorded in the incident management system.
10.8	Changes to approved plans (including this EP), equipment, plant, standards or procedures are assessed through the MoC process.	Changes are documented in accordance with the MoC processes.	MoC records are available in the MoC register.

Section	EPO	EPS	Measurement criteria
10.9	All records relevant to implementation of the EP are available for five years.	All records relevant to implementation of the EP are retained by EOG.	EP documents are readily accessible.
10.10.1	Emissions and discharges are recorded.	Emissions and discharges from the MODU and support vessels, in line with Table 9.5, are recorded.	Monitoring records are available and align with the requirements in Table 9.5.
10.10.2	Regulatory agencies and stakeholders are aware of activity start and end.	Pre- and post-activity notifications to regulatory agencies and stakeholders are issued as per Table 9.6.	Notification records verify issue.
10.10.3	The EP is reviewed for currency in light of any changes to the activity, controls, legislation or relevant scientific research.	EOG updates the EP as required.	The revision history of this EP is updated to record document changes.
10.10.3	This EP is reviewed and updated on an as-required basis.	This EP is reviewed and updated based on the triggers presented in Section 9.10.3 on an as-required basis.	A record of EP reviews and updates is available.
			The review and/or update details are recorded in the document control page of this EP.
		If the review identifies that significant changes to the EP are required, the EP is updated and re-issued to the regulators.	A record of EP revision is included in the document control page of this EP.
			Correspondence is available to verify the re-issue of the EP to NOPSEMA.
10.10.4	EP compliance inspections and audits are undertaken for the activity.	EP compliance is assessed during the activity by competent personnel.	Environmental inspection reports, completed checklists and audit report are available and verify compliance with this EP.
10.10.6	An end-of-activity EP performance report is submitted to NOPSEMA.	The end-of-activity EP performance report is issued to NOPSEMA within three months of completion of the activity.	The end-of-activity EP performance report and associated email correspondence is available to verify its issue to NOPSEMA.
10.10.7	An EP commitments register is established.	EP commitments register is in place and used throughout the campaign to track compliance with EPS.	EP commitments register verifies it is in use.