

timor leste



---

# **COVA-1 EXPLORATION DRILLING ENVIRONMENTAL MANAGEMENT PLAN AND MONITORING PROGRAM**

---

**TL-HSE-PL-005**

APRIL 2010

Eni Timor Leste SpA  
Rua D. Luis dos Reis Noronha no. 56,  
Vila Verde, Dili, Timor-Leste  
PO Box 52, Dili, Timor-Leste

Tel: +670 331 0847 ♦ Fax: +670 331 0849  
email: [info@enitimorleste.tl](mailto:info@enitimorleste.tl)



<b>Document Number:</b>					
TL-HSE-PL-005					
<b>Originating Department:</b>		HSE			
<b>Author/s:</b>		R Phillips			
<b>Custodian:</b>		R. Phillips			
<b>Document Title</b>					
<b>Cova-1 Exploration Drilling : Environmental Management Plan And Monitoring Program</b>					
<b>Abstract:</b> This Environmental Management Plan (EMP) for the Cova-1 drilling campaign was prepared in accordance with DNMA Guideline No. 7 <i>Preparation of an Environmental Management Plan. Regulation 27/1999</i> and the Framework of Reference document submitted to the Direcção Nacional Do Meio Ambient (DNMA). The EMP provides information concerning the drilling of the Cova-1 exploration well, its potential environmental and social impacts, and describes Eni's strategies to avoid, minimise and mitigate its impacts.					
0	Issued for Use	1 Apr 2010	R Phillips	E Mawuli	M Zuvo
A	Issued for internal review	30 Mar 2010	J. Nielsen (Sustainability)	R. Phillips	
Rev	Description of Revisions	Date	Prepared by:	Checked by:	Approved by:



## TABLE OF CONTENTS

<b>ABBREVIATIONS.....</b>	<b>1</b>
<b>1. INTRODUCTION.....</b>	<b>2</b>
1.1 Background.....	2
1.2 Project Proponent .....	2
1.3 Scope and Objectives of this Environmental Management Plan.....	3
1.4 Relevant Legislative Framework and Environmental Approval Process.....	3
1.4.1 Environmental Legislative Framework.....	3
1.4.2 Other Legislative Requirements .....	4
1.5 Stakeholder Consultation .....	5
<b>2. DESCRIPTION OF THE OPERATIONS.....</b>	<b>7</b>
2.1 Field Location .....	7
2.2 Previous Activities in the Permit Area.....	7
2.3 Proposed Drilling Program.....	9
2.4 Drilling Fluids and Cuttings.....	11
2.5 Core Sample.....	11
2.6 Wireline Evaluation .....	11
2.7 Drilling Support .....	11
2.8 Well Control Procedures.....	12
2.9 Operational Wastes .....	12
2.10 Drilling Safety .....	13
<b>3. DESCRIPTION OF THE ENVIRONMENT.....</b>	<b>14</b>
3.1 Physical Environment.....	14
3.1.1 Climate .....	14
3.1.2 Oceanography.....	16
3.1.3 18 .....	
3.1.4 Seismicity and Tsunamis.....	22
3.2 Biological Environment .....	23
3.2.1 Regional Overview .....	23
3.2.2 Bathypelagic Zone.....	24
3.2.3 Continental Shelf.....	25
3.2.4 Sea Mounts and Shoals .....	25
3.2.5 Coral reefs.....	26
3.2.6 Plankton .....	27
3.2.7 Marine Mammals.....	27
3.2.8 Reptiles .....	28
3.2.9 Fish .....	29

3.2.10	Birds .....	30
3.2.11	Mangroves .....	31
3.2.12	Conservation Significant Biological Resources .....	31
3.2.13	Conservation Areas.....	39
<b>3.3</b>	<b>Social Environment .....</b>	<b>39</b>
3.3.1	Socio-economic Profile.....	39
3.3.2	Communities Adjacent to the Drilling Area .....	41
3.3.3	Petroleum Activities.....	41
3.3.4	Shipping .....	41
3.3.5	Fisheries.....	42
3.3.6	Shipwrecks and Heritage Sites .....	42
<b>4.</b>	<b>ENVIRONMENTAL RISK ASSESSMENT .....</b>	<b>43</b>
4.1	Introduction.....	43
4.2	Environmental Risk Assessment Methodology .....	43
4.3	Cova-1 Risk Register – Routine Activities .....	47
<b>5.</b>	<b>ENVIRONMENTAL MANAGEMENT STRATEGIES.....</b>	<b>59</b>
5.1	Overview.....	59
5.2	Marine Discharges Management Strategy .....	60
5.3	Hydrocarbon and Chemical Spill Management Strategy .....	63
5.4	Atmospheric Emissions Management Strategy .....	65
5.5	Marine Pests Management Strategy .....	68
5.6	Marine Waste Management Strategy .....	70
5.7	Marine Fauna Management Strategy .....	72
<b>6.</b>	<b>IMPLEMENTATION STRATEGY .....</b>	<b>74</b>
6.1	Introduction.....	74
6.2	Measures to Ensure Environmental Performance are Met.....	74
6.3	Systems, Practices and Procedures.....	74
6.3.1	General .....	74
6.3.2	Emergency Response Manual .....	75
6.3.3	OSCP and Resources .....	75
<b>6.4</b>	<b>Chain of Command and Roles and Responsibilities .....</b>	<b>75</b>
6.4.1	Eni Crisis Management Team Leader (Managing Director) .....	75
6.4.2	Eni Representative onboard the drillship .....	75
6.4.3	Drillship Offshore Installation Manager (OIM) .....	76
6.4.4	Eni HSE Adviser.....	76
6.4.5	Eni Operations Manager .....	76
6.4.6	Eni Drilling Manager .....	76
<b>6.5</b>	<b>Training, Awareness and Competence .....</b>	<b>77</b>
<b>6.6</b>	<b>Environmental Management Monitoring, Reporting and Auditing .....</b>	<b>77</b>



6.6.1	Environmental Management Monitoring .....	77
6.6.2	Reporting.....	79
6.6.3	Surveillance Audit Program .....	79
6.7	Review of the EMP .....	81
7.	REFERENCES .....	82

## FIGURES

Figure 2.1	Cova-1 Well Location .....	8
Figure 2.2	Cova-1 Well Schematic .....	10
Figure 3.1	Generalised Atmospheric Circulation over Australia in Winter (July) (from Swan <i>et. al.</i> 1994).....	14
Figure 3.2	Generalised Atmospheric Circulation over Australia in Summer (January) (from Swan <i>et. al.</i> 1994) .....	15
Figure 3.3	Tropical cyclones crossing within 200km of 10° 15' 45.19"S 125° 55' 58.65"E (1970 to 2006) (BOM 2009) .....	15
Figure 3.4	Seasonal wind roses for the Timor Sea (Saipem Energy Services, 2009).....	17
Figure 3.5	Regional Currents (CSIRO, 2004).....	18
Figure 3.6	Bathymetry of the Cova well location .....	22
Figure 3.7	Regional bathymetry.....	22
Figure 3.8	Indo-West Pacific biogeographical province.....	24
Figure 4.1:	Risk Assessment Methodology .....	44

## TABLES

Table 1.1	Links between this EMP and the requirements of Guideline No. 7 .....	4
Table 1.2	Relevant Legislation, Codes of Practice and International Agreements for the Drilling Campaign .....	4
Table 1.3	Organisations and representatives invited to attend Eni's Cova-1 exploration drilling stakeholder forum.....	6
Table 2.1:	Geographical Coordinates of the Proposed Cova-1 Well.....	7
Table 2.2:	Drilling Program for the Cova-1 Exploration Well.....	9
Table 3.1:	Standard tide levels for Cova-1 (Fugro, 2009) .....	19
Table 3.2:	Monthly and All-year Surface Seawater Temperature Statistics (Fugro, 2009) .....	20
Table 3.3:	All-year Seawater Temperature Profile (Fugro, 2009).....	20



Table 3.4:	All-year Seawater Salinity Profile (Fugro, 2009).....	21
Table 3.5	Seabirds species on Ashmore Reef and at sea within the Timor MOU74 Box during a survey between September and October, 1998 (CSIRO 1999b) .....	30
Table 3 6:	Protected marine species listed under EPBC Act potentially <i>occurring within a 100km radius of the proposed Cova well location</i> (EPBC Protected Matters Database Search) .....	32
Table 4.1:	Eni Risk Matrix.....	45
Table 4.2:	Environmental Consequence Descriptors .....	46
Table 4.3:	Cova-1 Drilling: Potential Environmental and Social Risks and their Safeguards .....	47
Table 4.4:	Cova-1 Risk Register – Oil, fuel and chemical spills: potential environmental risks and their safeguards.....	57
Table 6.1:	Operational monitoring .....	78
Table 6.2:	Proposed audit program .....	81

## APPENDICES

Appendix A:	Eni Health, Safety and Environment Policy
Appendix B:	Saipem 10000 Specification
Appendix C:	Sea Witch Specifications

## ABBREVIATIONS

ALARP	As Low As Reasonably Practicable	GHG	Greenhouse Gases
AMOSC	Australian Marine Oil Spill Centre	HSE	Health, Safety and Environment
AMSA	Australian Marine Safety Authority	IMOP	International Maritime Organisation
ANP	Autoridade Nacional do Petróleo (National Petroleum Authority)	IMS	Integrated Management System
APPEA	Australian Petroleum Production and Exploration Association	IUCN	International Union for the Conservation of Nature
ARPA	Automatic Radar Plotting Aids	JAMBA	Japan- Australia Migratory Bird Agreement
AQIS	Australian Quarantine Inspection Service	JPDA	Joint Petroleum Development Area
BOP	Blow-out Preventer	JVP	Joint Venture Partner
CAMBA	China-Australia Migratory Bird Agreement	KCI	Potassium Chloride
CITES	Convention on International Trade in Endangered Species	KPI	Key Performance Indicator
CMP	Crisis Management Plan	LAT	Lowest Astronomical Tide
CMS	Convention on Migratory Species	MARPOL 73/78	International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 relating thereto
DEMT	Drilling Emergency Management Team	NIMS	Non-indigenous Marine Species
DNMA	Direcção Nacional do Meio Ambiente (National Directorate of Environment)	NOx	Nitrogenous oxides
DNPA	Direcção Nacional de Pescas e Aquicultura (National Directorate of Fisheries & Aquaculture)	ODS	Ozone Depleting Substances
DNPG	Direcção Nacional de Petróleo e Gas (National Directorate of Petroleum & Gas)	OIM	Offshore Installation Manager
EIS	Environmental Impact Statement	OSCP	Oil Spill Contingency Plan
EMP	Environmental Management Plan	PHG	Prehydrated gel
EMS	Environmental Management System	PHPA	Partially-hydrolyzed polyacrylamide
Eni	Eni Timor Leste S.p.A.	PSC	Production Sharing Contract
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999	ROV	Remotely Operated Vehicle
GDP	Gross Domestic Product	SOI	Southern Oscillation Index
		SOx	Sulphurous oxides
		UN	United Nations
		UNCLOS	United Nations Convention on the Law of the Sea
		WBM	Water Based Mud





## 1. INTRODUCTION

### 1.1 BACKGROUND

Eni Timor Leste S.p.A. (Eni) proposes to drill the Cova-1 exploration well in Permit Area S-06-03 (Contract Area C). The permit is located in the northern Bonaparte Basin in Timor-Leste sovereign waters, approximately 100km from the southeast coast of Timor Leste, approximately 125km south of Dili and approximately 725km northwest of Darwin.

The well will take approximately 45 days to drill with drilling, due to commence in July 2010 (subject to receiving environmental approval). Cova-1 will be drilled by the *Saipem 10000* drillship.

An Environmental Impact Statement (EIS) with respect to the Cova-1 exploration well was submitted to the Direcção Nacional do Meio Ambiente (DNMA) (National Directorate of Environment) for assessment. This Environmental Management Plan (EMP) was prepared for submission to DNMA in accordance with Article 17 of Indonesian Government Regulation No. 27/1999 *Analysis of Environmental Impacts*.

### 1.2 PROJECT PROPONENT

The proponent of this proposal is Eni Timor Leste S.p.A (Eni). Eni's contact details are:

Eni Timor Leste S.p.A  
Rua D. Luis dos Reis Noronha no. 56,  
Vila Verde, Dili, Timor-Leste  
PO Box 52, Dili, Timor-Leste  
Tel: +670 331 0847

Eni is the Operator of the Production Sharing Contract (PSC) covering the Cova field and is also Operator of the Project on behalf of the Joint Venture Partners (JVPs):

- Eni Timor Leste S.p.A. (80%);
- KG Timor Leste Ltd (10%); and
- Galp Exploration and Production (Timor Leste) SA (10%).

The nominated proponent contact for this proposal is:

Rob Phillips  
Senior Environmental Advisor  
Eni Australia Ltd  
Tel: +61 (0)8 9320 1541  
E-Mail: rob.phillips@eniaustralia.com.au



Eni is one of the world's major integrated energy companies. In the Timor Sea, Eni has activities in the Joint Petroleum Development Area (JPDA) as well as five PSCs in Timor-Leste's sovereign area. Eni is committed to achieving the highest practicable standard of environmental protection and this commitment is documented in the Eni Health, Safety and Environment (HSE) Policy (Appendix A).

In January 2008, Eni's HSE Integrated Management System (IMS) achieved certification with ISO14001:2004 Environmental Management Systems for its drilling and seismic survey activities. This certification provides audited assurance of a best-practice environmental management system based on continual improvement.

### 1.3 SCOPE AND OBJECTIVES OF THIS ENVIRONMENTAL MANAGEMENT PLAN

The scope of this EMP is all operational activities relating to the drilling of the Cova-1 exploration well. The overall aim of the EMP is to demonstrate to DNMA that Eni has a sound understanding of how its operations interact with the environment and that it has implemented environmental safeguards to reduce the risks to as low as reasonably practicable (ALARP).

As operator of the PSC and in line with international industry best practice, Eni has prepared this EMP with the following objectives:

- provide a description of the activity (Section 2);
- provide a description of the known environment in the vicinity of the activity (Section 3);
- assess the potential environmental effects and risks associated with the activity (Section 4);
- outline Eni's Environmental Management Strategies for the drilling campaign (Section 5); and
- outline Eni's management system for implementing this (Section 6).

### 1.4 RELEVANT LEGISLATIVE FRAMEWORK AND ENVIRONMENTAL APPROVAL PROCESS

#### 1.4.1 Environmental Legislative Framework

Contract Area C is regulated by the Direcção Nacional de Petróleo e Gas (DNPG) (National Directorate of Petroleum & Gas) under PSC S06-03 between Eni and the government of Timor-Leste. Environmental approval of petroleum exploration and production proposals in Timor-Leste is regulated by DNMA.

DNMA Guideline No. 7 *Preparation of an Environmental Management Plan* defines the requirements for an EMP for development proposals. Annex A of Guideline No. 7 describes the required scope and content of an EMP and Annexes B to G describe the environmental and social aspects that should be considered. Table 1.1 outlines the required elements of an EMP under DNMA Guideline No. 7 and the links to relevant sections in this EMP.

**Table 1.1 Links between this EMP and the requirements of Guideline No. 7**

DNMA Guideline No. 7		Cova-1 EMP
I.	Project Description	Section 2: Description of the Operations
II.	Physical, Biological and Social Impacts and Mitigation Measures	Section 4: Environmental Risk Assessment Section 5: Environmental Management Strategies Section 6: Implementation Strategy
III.	Monitoring, Reporting and Auditing Schedule	Section 6.6: Environmental Management Monitoring, Reporting and Auditing
IV.	Organisation and Management Structures.	Section 6.4: Chain of Command and Roles and Responsibilities
V.	Resources	Section 6.3: Systems, Practices and Procedures
VI.	Capacity Building and Training	Section 6.5: Training, Awareness and Competence
VII.	Declaration of Compliance	Submitted with EMP

#### 1.4.2 Other Legislative Requirements

As stated in Eni's HSE policy (Appendix A), Eni shall ensure that it conducts its operations in accordance with legislative requirements. To achieve this, Eni maintains a database that describes legislation relevant to the environmental management aspects of its operations. Eni shall ensure that the Cova-1 drilling campaign complies with all relevant Acts and regulations.

Table 1.2 highlights the most significant legislation and licence requirements in respect of the environmental considerations relating to Eni's operations. Eni reviews the environmental legislation database annually or when significant environmental legislation changes occur. The annual review will be confirmed during an annual environmental audit of Eni operations.

**Table 1.2 Relevant Legislation, Codes of Practice and International Agreements for the Drilling Campaign**

International Agreements and Legislation
<i>United Nations Convention on the Law of the Sea 1982.</i>
<i>International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 relating thereto (commonly known as MARPOL 73/78) and implemented in Australia through the Protection of the Sea (Prevention of Pollution from Ships) Act 1983).</i>
<i>Protocol to International Convention for the Prevention of Marine Pollution by Dumping of Waste and Other Matter 1972 (commonly known as the 1996 Protocol).</i>
<i>Agreement Between the Government of Australia and the Government of the People's Republic of China for the Protection of Migratory Birds and their Environment 1986 (commonly referred to as CAMBA).</i>

<i>Agreement Between the Government of Australia and the Government of Japan for the Protection of Migratory Birds and Birds in Danger of Extinction and their Environment 1974 (commonly referred to as JAMBA).</i>
<b>Republic of Timor-Leste Legislation</b>
<i>Maritime Zones Act 2002.</i>
<i>Timor-Leste Petroleum Act 2004.</i>
<i>DNMA Guideline #5 on Public Engagement</i>
<i>DNMA Guideline #6 on Environmental Screening</i>
<i>DNMA Guideline #7 on Preparation of an Environmental Management Plan</i>
<b>Indonesian Legislation and Regulations in effect on 25 October 1999</b>
<i>Law 23/1997 on Environmental Management</i>
<i>Reg. 20/1990 on Control of Water Pollution</i>
<i>Reg. 27/1999 on Analysis of Environmental Impacts</i>
<b>Industry Codes of Practice and Guidelines</b>
<i>Australian Petroleum Production and Exploration Association (APPEA) Code of Environmental Practice 1996: This provides guidance on a set of recommended minimum standards for petroleum industry activities offshore. These standards are aimed at minimising adverse impact on the environment, and ensuring public health and safety by using the best practical technologies available.</i>

## 1.5 STAKEHOLDER CONSULTATION

External consultation was initiated by Eni's consultation with DNMA and submission of the draft Framework of Reference (FoR) on 24 November 2009. The purpose of this consultation was to inform DNMA on the scale and nature of the Cova-1 drilling program, clarify the environmental approvals process and present Eni's draft Framework of Reference for the EIA.

Subsequently, Eni arranged a forum in Timor-Leste on Tuesday 23rd February, to explain the details of the drilling program and to respond to questions. Table 1.3 presents the organisations and representatives invited to the forum.

**Table 1.3 Organisations and representatives invited to attend Eni's Cova-1 exploration drilling stakeholder forum**

Organisation/representative	Attendance
DNMA	✓
Autoridade Nacional do Petroleo (ANP)	✓
National Directorate of Oil and Gas (DNPG)/State Secretariat of Mineral Resources (SERN)	—
Secretary of State for Environment	—
Turismo Timor Leste - Ministerio Desenvolmemtu	—
Public Works	✓
Director of Transport	—
Director of Land and Property	—
Director of International Environment	—
Maritime Customs	—
Minister of Economy and Development	—
TradeInvest Timor-Leste	—
Direccao Nacional Industria	—
Direccao Nacional Pesca & Aquacultura	✓
Director of Haburas Foundation	—
Director Luta Hamutuk	✓
Director Lao Hamutuk	✓
Director of NGO Forum	—

Since this early consultation, planning for the Cova-1 drilling program has progressed and this draft EMP has been developed. Eni will incorporate any feedback into the finalised EMP for the project.

## 2. DESCRIPTION OF THE OPERATIONS

### 2.1 FIELD LOCATION

The Cova-1 exploration well is located in PSC S06-03, situated in the northern Bonaparte Basin within Timor-Leste waters (Figure 2.1). It is located approximately 100km from the southeast coast of Timor Leste, approximately 125km south of Dili and approximately 725km northwest of Darwin. The geographical coordinates of the Cova exploration well are presented in Table 2.1.

**Table 2.1: Geographical Coordinates of the Proposed Cova-1 Well**

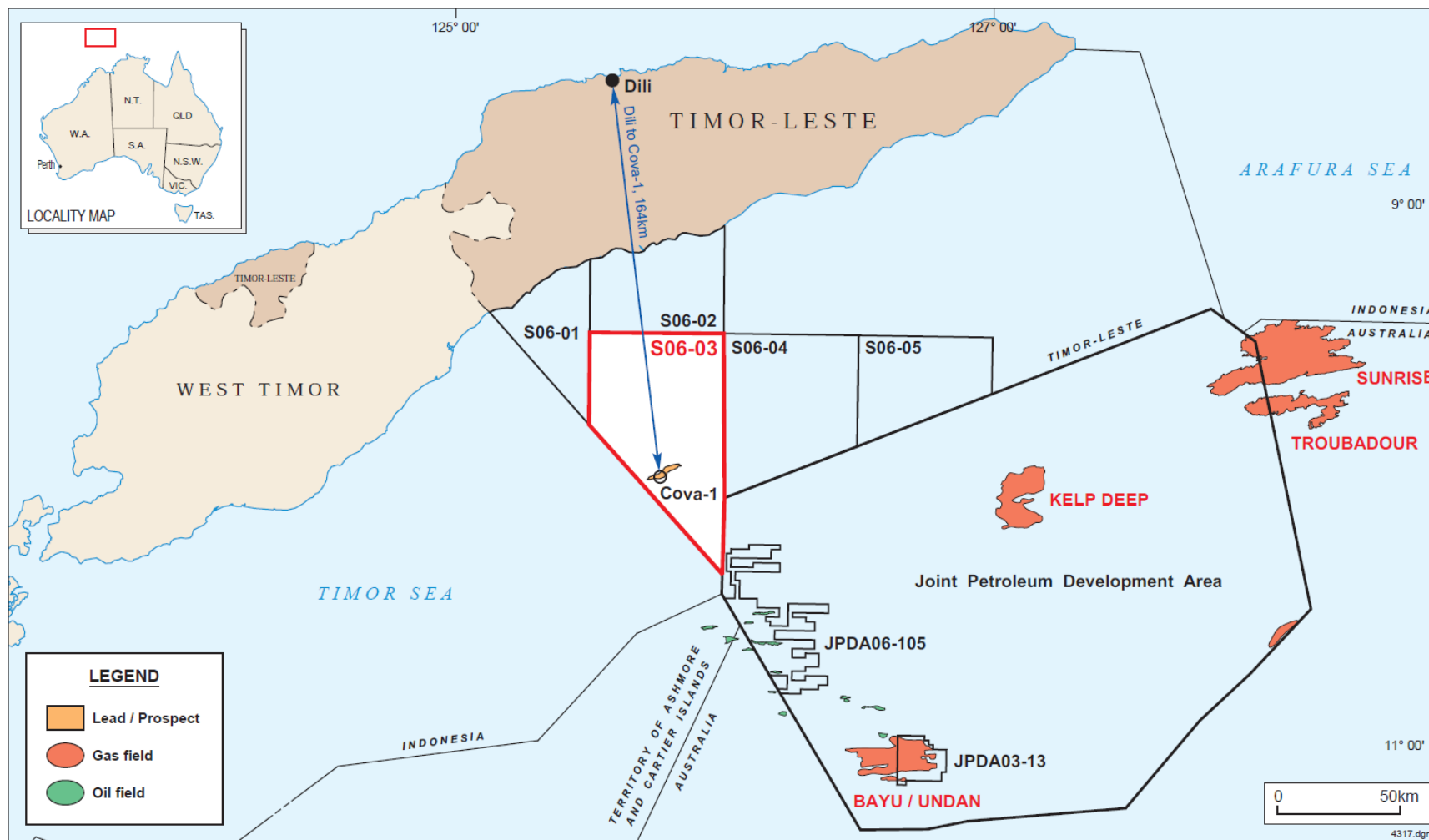
Well	Latitude	Longitude
Cova-1	10°01'59.24" S	125°45'58.85" E

### 2.2 PREVIOUS ACTIVITIES IN THE PERMIT AREA

Oil exploration activities in the Timor Sea commenced in the late 1960s. Since this time numerous wells have been drilled throughout the region, resulting in finds for Eni, OMV, BHP Billiton Petroleum, Santos, TCPL Resources, Norcen International, Peko Oil, Western Mining Corporation, BP, Shell and Woodside Energy. Eni's Kitan Development in the JPDA is expected to commence production in 2011. Producing oil and gas fields in the JPDA include Laminaria/Corallina (oil), Elang-Kakatua (oil) and Bayu-Undan (gas).

Searches for new sources of hydrocarbons are actively being pursued in the region. The petroleum exploration and production industry is a significant stakeholder of offshore waters in the region, particularly within and adjacent to the JPDA between Timor Leste and Australia.

No wells have been drilled in PSC S06-03. However, the permit area was covered by an extensive grid of 3D seismic data acquired in June 2007 (ENI 2007).



## 2.3 PROPOSED DRILLING PROGRAM

The proposed Cova-1 well will be drilled as a vertical exploration well. Drilling will be undertaken using the drillship, *Saipem 10000*. The specifications of the *Saipem 10000* are presented in Appendix B.

On arrival at site, the drillship will move into position and remain in position using the Class III Dynamic Positioning system. Table 2.2 outlines the drilling programme for the Cova-1 exploration well and Figure 2.2 presents the well schematic diagram.

Drilling is scheduled to commence in July 2010, subject to obtaining environmental approval. The drilling program is scheduled to take 45 days to complete.

**Table 2.2: Drilling Program for the Cova-1 Exploration Well**

Activity	
1	Mobilisation to Cova-1
2	Positioning
3	Spud in - Drill 26" x 42" hole to 2225m
4	Run and cement 36" x 20" Dual Casing
5	Run and Latch Blow Out Preventer (BOP) on wellhead and Test BOP
6	Drill 16" hole from 2225m - 3405m
7	Run and cement 13-3/8" casing
8	Drill 12-1/4" hole from 3405m - 3900m
9	Wireline Logs
10	Run and cement 9-5/8"
11	Drill 8-1/2" hole from 3900m to 4205m
12	Wireline Logs
13	Abandonment and Retrieval of BOP and Wellhead
14	Demobilisation to Singapore



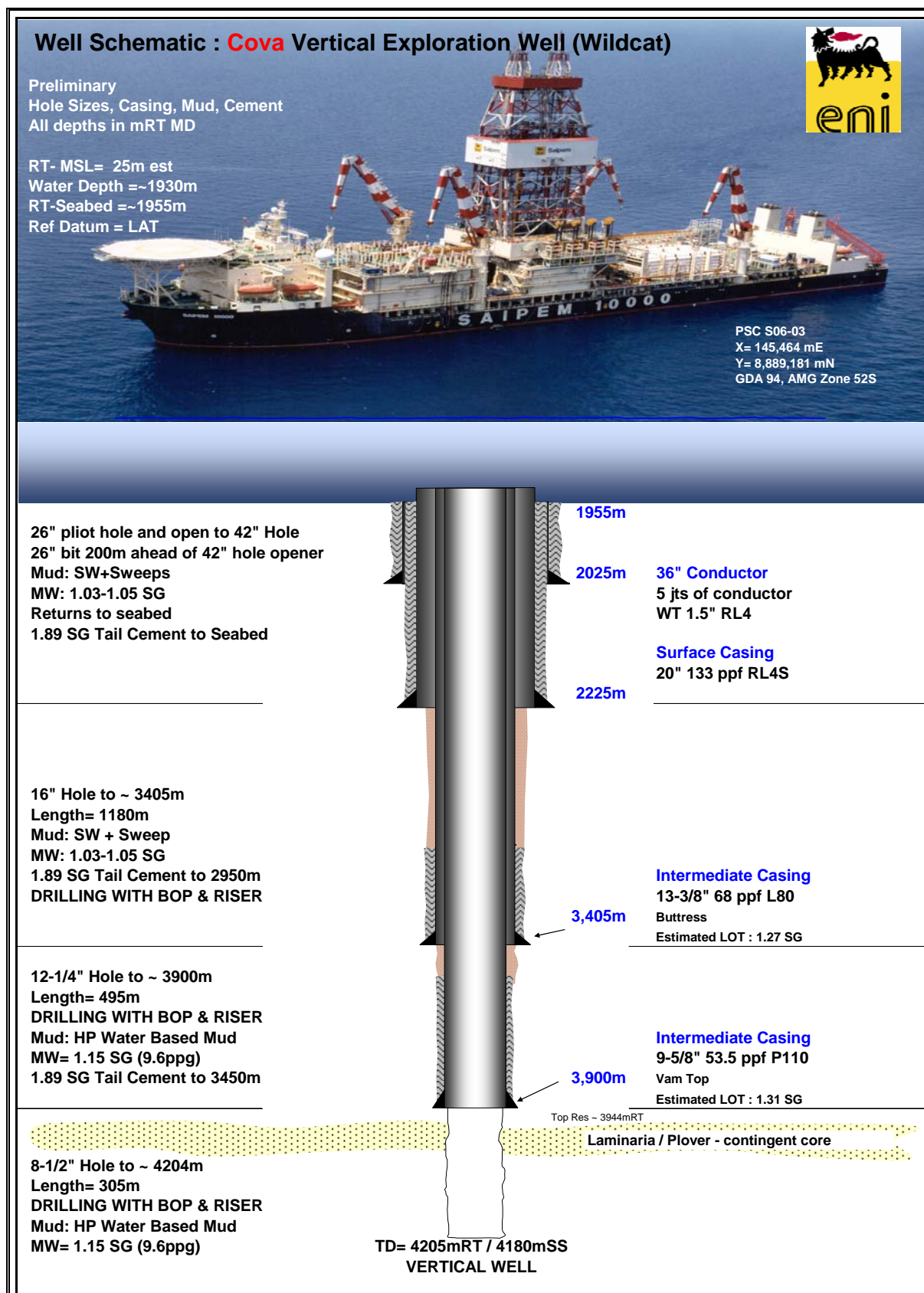


Figure 2.2 Cova-1 Well Schematic

## 2.4 DRILLING FLUIDS AND CUTTINGS

Eni proposes to drill the top 270m riser-less using seawater and prehydrated gel (PHG) sweeps. Approximately 130m<sup>3</sup> of drill cuttings would be produced from this top section. The cuttings would be continuously discharged directly onto the surface of the seabed adjacent to the well.

From 2,225 to 3,405m (relative to rotary table) will be drilled using seawater and PHG sweeps. The last two hole sections (3,405 to 4,205m) will be drilled with a WBM containing Potassium Chloride (KCl) and polymers. All muds to be used in this well will have low toxicities, degrade rapidly in the marine environment and are routinely accepted for use by the regulatory authorities. Approximately 280m<sup>3</sup> of cuttings will be generated from the bottom section. These cuttings would be brought onboard the drillship and separated to retain the fluids prior to disposing of the cuttings at the sea surface.

## 2.5 CORE SAMPLE

The primary objective of coring is to obtain fresh reservoir rock for reservoir studies. If hydrocarbons are encountered, a 27m core will be cut in the top Laminaria (Elang) Formation. Consolidated sandstones are expected, hence a standard 171.5mm (6¾") Core Barrel will be used (no need for a Full-Closure barrel).

## 2.6 WIRELINE EVALUATION

A wireline program is planned at the end of the well. This program may be extended in the event hydrocarbons are encountered. The well will then be plugged and abandoned.

## 2.7 DRILLING SUPPORT

Drilling support will be provided by the platform supply vessel *Sea Witch*, based in Darwin and owned by Deep Sea Supply Pty Ltd and under contract with Eni during the Cova-1 drilling operations. The specifications of the *Sea Witch* are presented in Appendix C. *Sea Witch* will conduct supply services from Darwin to the Cova-1 well site. A supply vessel will be transiting on average twice per week between Darwin and the Cova-1 well location.

A second support vessel shall be stationed on site throughout the drilling program. The second support vessel is yet to be selected however will be sourced from Darwin.

Helicopter support will be based at Dili (as will service crew changes), with connection between Dili and Darwin by fixed wing aircraft. Eni's drilling team will operate from the company's Perth office.

## 2.8 WELL CONTROL PROCEDURES

Eni's Well Control Procedures are based on three key elements. These include:

- thorough assessment of the geology and formation pressures prevalent in the area;
- design of the drilling fluid programme; and
- well control procedures used by the drilling contractor.

Eni's drilling programme will fully incorporate these three key well control elements to provide an industry 'best practice' approach to well control. This will include training and accreditation of both the drilling contractor's and operator's site supervisory personnel.

## 2.9 OPERATIONAL WASTES

Routine drilling operations generate the following types of waste:

- drill cuttings, discharged overboard continuously during drilling after screening to separate the drilling fluids;
- drilling fluids/muds are generally discharged overboard at the end of various hole sections and at the completion of the well;
- the *Saipem 10000* will have containment zones and bunding in all areas where oil products are stored and oily residues will be stored in drums and shipped onshore for disposal at authorised sites. Minor deck spills will be washed with bio-degradable detergents and polluted deck drainage water will be collected in a settling tank for later disposal onshore in Australia;
- sewage, grey water and putrescible wastes discharged overboard after treatment;
- cooling waters, discharged overboard continuously during drilling;
- domestic and industrial solid wastes and hazardous solid and liquid wastes, collected and segregated on the drillship for transport to shore for appropriate disposal at intervals during drilling; and
- engine and waste oil, which will be collected, as per the *Saipem 10000* Waste Management Plan and transported to Australia for appropriate onshore disposal.

Waste disposed of onshore in Australia will be received at Shorebase's supply base in Darwin. Hazardous waste (as defined in the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal) requires an import permit as per the Commonwealth of Australia's Hazardous Waste (Regulation of Exports and Imports) Act 1989. Accordingly, an assessment is required to be made of the waste prior to disposal. Both the hazardous and non-hazardous wastes are collected by Veolia for disposal to appropriately licensed facilities.



## 2.10 DRILLING SAFETY

The well will be designed and engineered to the requirements of the *Interim Regulations issued under Article 37 of the Interim Petroleum Mining Code* and Eni's standards for well design to maintain well control. Most wells within the nearby JPDA show a normal pressure regime down to total depth e.g. Kitan-1 and -2, Capung-1a, Jahul-1, Krill-1, Kuda Tasi-1, -2 and -3. Blow-out preventers (BOPs) will be used to contain pressures in excess of those encountered in earlier wells.

Casing sizes and lengths and the intervals where the hole is cement sealed around the casing will be selected to maximise well control. Experience gained with previously drilled exploration wells in the nearby Permit Area JPDA 06-105 will be taken into consideration in the well design.

The positioning and operation of the drillship will be closely supervised by the Drilling Contractor's marine personnel and the Eni Drilling Supervisor. During the drilling programme, a temporary safety exclusion zone with a radius of 500m around the drillship will be declared and appropriately gazetted. Few vessels are expected to be operating in the area, but those that do will be informed of the location of the drillship and the exclusion zone by radio.

An Emergency Response Plan is contained within the *Saipem 10000 Drill Ship Safety Case*. An Oil Spill Contingency Plan (OSCP), detailing actions to be taken in the event of an emergency or an oil spill, will be prepared. Copies of both plans will be introduced in the environmental induction process undertaken by all employees and contractors.

### 3. DESCRIPTION OF THE ENVIRONMENT

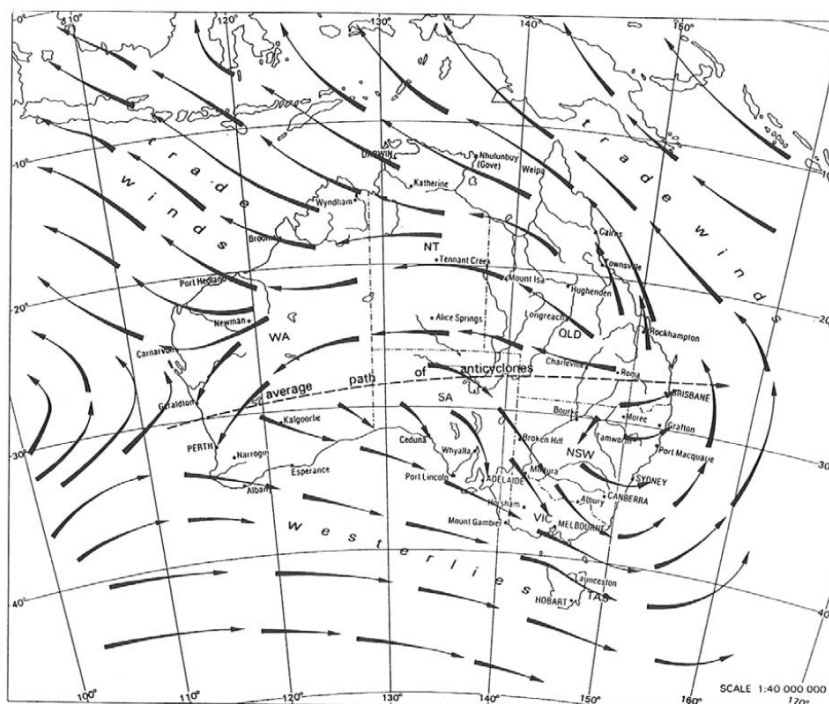
#### 3.1 PHYSICAL ENVIRONMENT

##### 3.1.1 Climate

###### Regional Overview

The Timor Sea has two distinct seasons: “winter” from April to September and “summer” from October to March. The short period between the two seasons is termed the transition season. During this period, either winter or summer regimes could dominate.

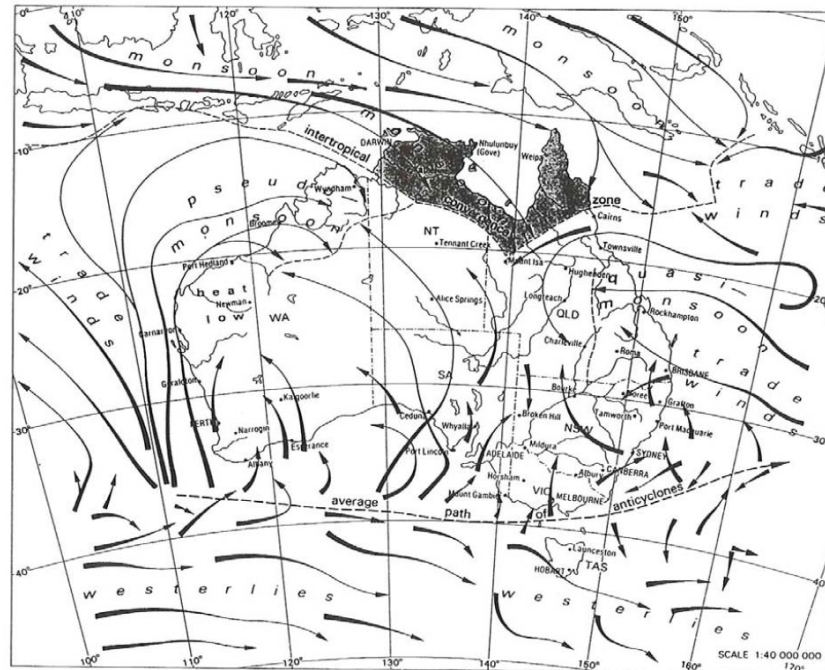
The “winter” dry season (April to September) is characterised by steady easterly (northeast to southeast) winds of  $5$  to  $13\text{ms}^{-1}$  driven by the South East Trade Winds over Australia. Figure 3.1 shows the general atmospheric circulation pattern over the Timor Sea during winter.



**Figure 3.1 Generalised Atmospheric Circulation over Australia in Winter (July)**  
(from Swan *et al.* 1994)

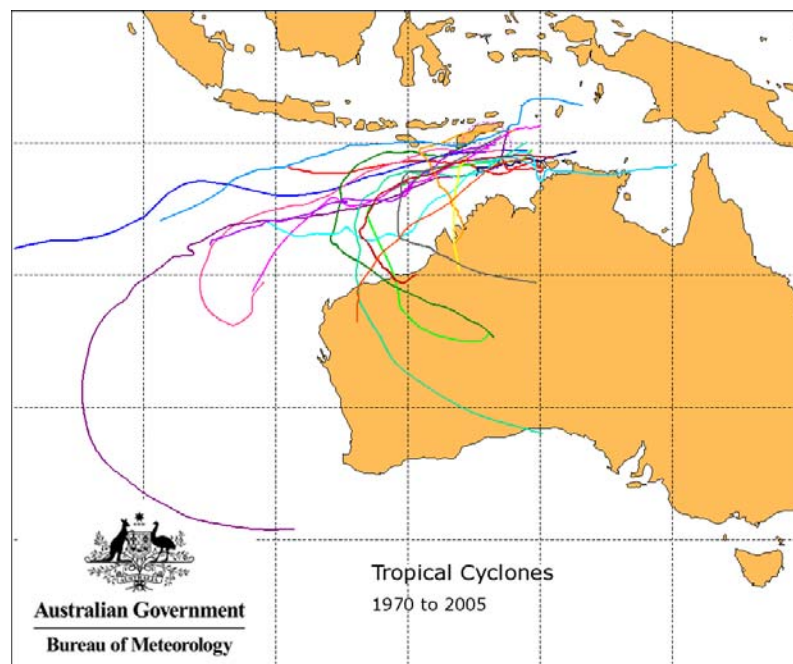
The “summer” season (October to March) is the period of the predominant North West Monsoon. It is characterised by mostly westerly (west-southwest) winds of  $5\text{ms}^{-1}$  for periods of 5 to 10 days with surges in the airflow of  $10\text{ms}^{-1}$  to  $18\text{ms}^{-1}$  for the period of 1 to 3 days. Figure 3.2 shows the general atmospheric circulation pattern over the Timor Sea during summer.





**Figure 3.2 Generalised Atmospheric Circulation over Australia in Summer (January) (from Swan et. al. 1994)**

Tropical cyclones can develop between November and April resulting in short lived, severe storm events often with strong but variable winds. Figure 3.3 shows the cyclone tracks logged over a 36 year period that cross within 200km of the drilling location.



**Figure 3.3 Tropical cyclones crossing within 200km of 10° 15' 45.19''S 125° 55' 58.65''E (1970 to 2006) (BOM 2009)**

### **Rainfall and Temperature**

Mean annual rainfall in the region is 1,700mm. Almost all rainfall occurs between November and April, the greatest falls being in January and February. The frequency and severity of the thunderstorms produce a large variation in the monthly rainfall. Rainfall during the dry months is sporadic and light.

Mean air temperatures are 26.9°C in July and 28.4°C in December.

### **Wind Patterns**

Joint frequency distributions were calculated from 10 complete years (July 1997 – Jun 2007) of verified NCEP ambient modelled data for the Cova-1 location. Wind roses for the winter, summer and transitional seasons are presented in Figure 3.4. These display the expected seasonal variation in prevailing wind direction, with westerlies (southwest-northwest) persisting from October to March, and a fairly rapid shift to easterlies (northeast – southeast) in late March or early April that then persist until late October or early November before the return to the westerlies.

## **3.1.2 Oceanography**

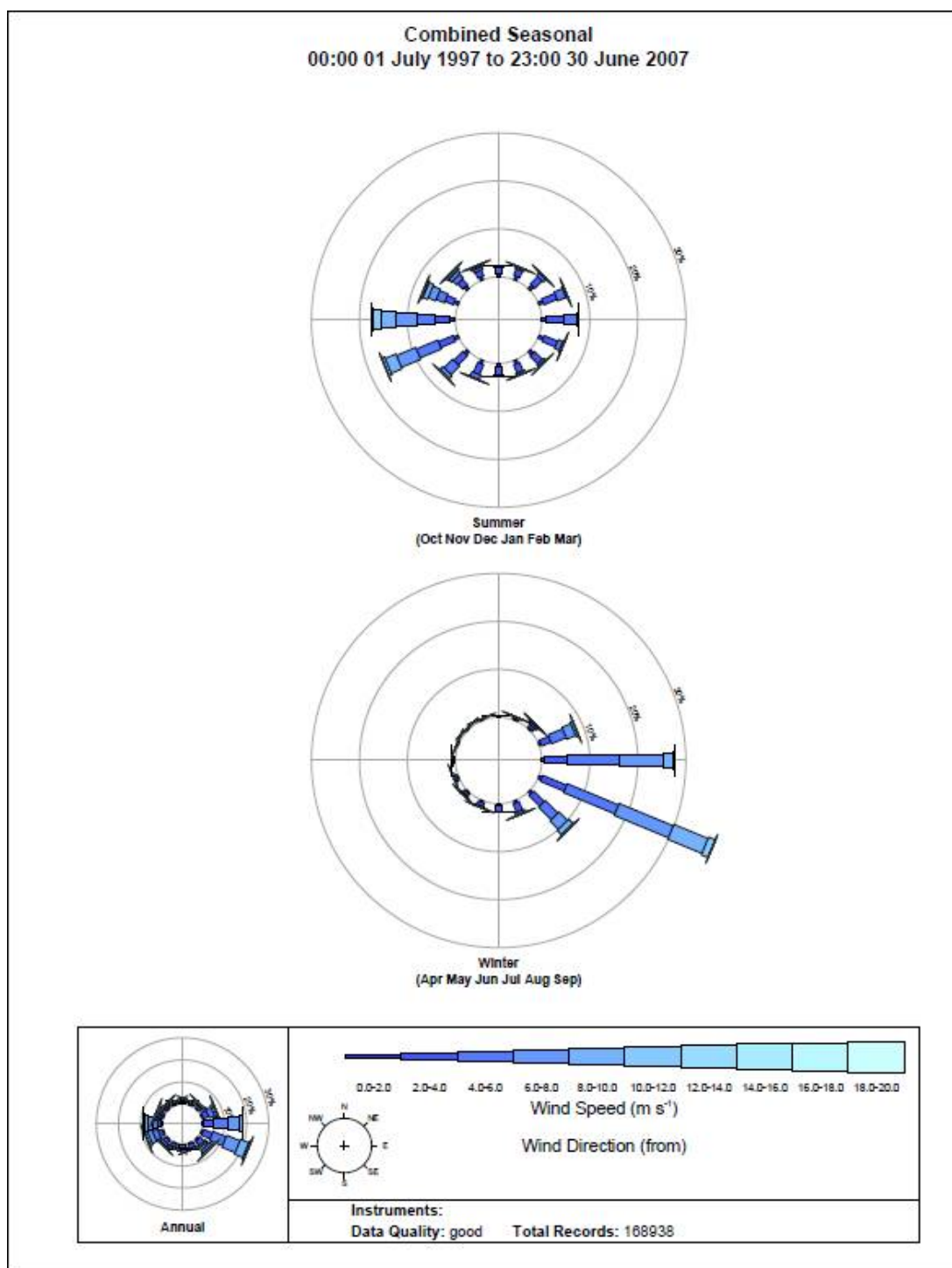
### **Currents and Tides**

The main forces contributing to surface water movement at the Cova-1 location are:

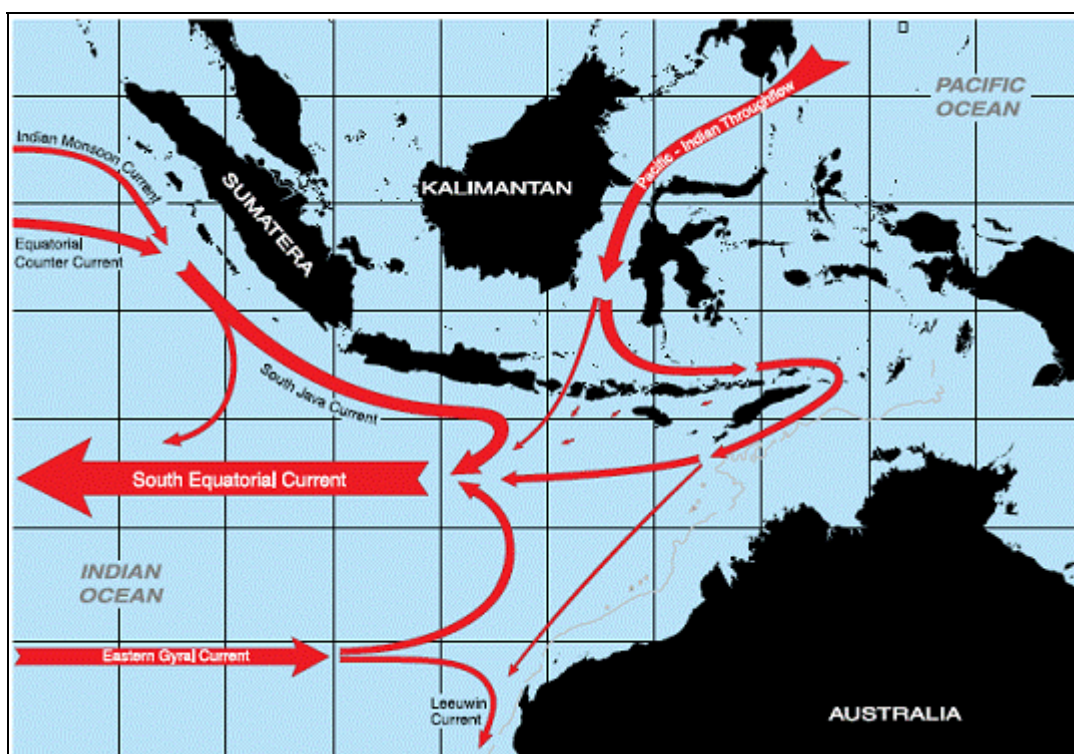
- general oceanic circulation;
- astronomical tides; and
- wind stress.

The Pacific – Indian Throughflow flows south through the Indonesian Archipelago and into the Eastern Indian Ocean bathing it in warm, relatively low salinity seawater (Figure 3.5). At the Cova location, this may add a westerly component to the current regime. Current speeds vary depending on the season. Lowest speeds would occur in April at the end of the northwest monsoon when winds blow towards the Pacific whilst highest speeds would occur in September associated with the southeast monsoon (Wijffels et al., 1996).





**Figure 3.4 Seasonal wind roses for the Timor Sea (Saipem Energy Services, 2009)**



**Figure 3.5 Regional Currents (CSIRO, 2004)**

Tidal currents in the region are anti-clockwise rotational, commencing flood towards the NE and ebb towards the SW. Speeds will range from about 0.02m/s on neap tides to 0.1m/s on springs.

Surface currents are expected to reflect seasonal wind regimes (Figure 3.4). Local wind-driven surface currents may attain maximum speeds of  $0.7\text{ms}^{-1}$  during extreme wind surges. More typically speeds would be in the range of  $0.2\text{ms}^{-1}$  to  $0.4\text{ms}^{-1}$ .

The tides in the vicinity of the proposed Cova-1 well are semidiurnal (two highs and lows each day) with a slight diurnal inequality (difference in heights between successive highs and low). There is a well defined spring-neap lunar cycle, with spring tides occurring two days after the new and full moon. Table 3.1 provides the standard tidal levels for the Cova-1 Field. Highest Astronomical Tide (HAT) is 3.25m and the mean ranges for spring and neap tides are 2.08m and 0.58m, respectively.

**Table 3.1: Standard tide levels for Cova-1 (Fugro, 2009)**

Northern Endeavour	Level (m)
Highest Astronomic Tide (HAT)	3.25
Mean High Water Springs (MHWS)	2.65
Mean High Water Neaps (MHWN)	1.90
Mean Sea Level (MSL)	1.61
Mean Low Water Neaps (MLWN)	1.32
Mean Low Water Springs (MLWS)	0.57
Lowest Astronomic tide (LAT)	-0.07

### Sea and Swell

Waves at the proposed Cova-1 well location comprise contributions from:

- Southern Ocean swells;
- summer monsoonal swells;
- winter easterly swells; and
- locally generated seas.

The most persistent swell will arrive from the west and southwest with typical heights of 2m in winter and 1m in summer. Since longer period swell suffer less dissipation, periods of long-travelled swell commonly reach 18 seconds and occasionally exceed 20 seconds.

Shorter period swell (6 to 10 seconds), may result from tropical cyclone, winter easterlies over the Arafura Sea and the eastern portions of the Timor Sea, and summer westerlies over the western portions of the Timor Sea.

Local wind generated sea is highly variable but typically ranges in period from 2 seconds to 6 seconds with heights of up to 6m in strong persistent forcing at some locations (Swan *et al*, 1994).

### Seawater Temperature and Salinity

Surface sea temperatures in the vicinity of the Cova-1 oilfield are expected to range from about 30°C in summer to 26°C in winter. Table 3.2 presents monthly minimum, maximum and mean temperatures. Seawater temperature and salinity profile data are given in Table 3.3 and Table 3.4 respectively.

**Table 3.2: Monthly and All-year Surface Seawater Temperature Statistics (Fugro, 2009)**

COMBINED PERIOD (1855 to 2009)	STATISTICS		
	Seawater Temperature at Surface (°C)		
	MIN	MEAN	MAX
January	25.00	29.46	32.10
February	25.00	29.29	32.00
March	26.00	29.71	33.00
April	26.00	29.22	33.00
May	25.00	28.65	32.00
June	24.60	27.83	31.00
July	23.00	26.61	30.00
August	24.50	26.70	29.70
September	23.50	27.34	29.50
October	24.00	28.31	31.00
November	25.00	29.46	32.50
December	25.00	29.69	33.90
All-Year	23.00	28.74	33.90

**Table 3.3: All-year Seawater Temperature Profile (Fugro, 2009)**

DEPTH (m)	SEAWATER TEMPERATURE		
	MIN (°C)	MEAN (°C)	MAX (°C)
0	25.5	28.8	33.4
10	25.5	28.4	31.5
20	25.4	28.1	30.6
30	24.2	27.7	30.1
50	22.2	26.9	29.1
75	20.4	25.7	28.7
100	18.3	23.9	28.5
125	16.3	21.7	28.2
150	14.9	19.3	23.1
200	12.6	15.8	19.2
250	10.9	13.2	16.1
300	9.6	11.5	13.5
400	8.1	9.3	10.3
500	7.2	7.9	8.9
600	6.5	7.0	7.8
700	6.0	6.3	6.9
800	5.5	5.8	6.1
900	4.9	5.2	5.6
1000	4.5	4.8	5.1
1100	4.2	4.5	4.8
1200	3.9	4.2	4.5
1300	3.7	4.0	4.2
1400	3.5	3.8	3.9
1500	3.3	3.6	3.7

**Table 3.4: All-year Seawater Salinity Profile (Fugro, 2009)**

DEPTH (m)	SALINITY		
	MIN (PSU)	MEAN (PSU)	MAX (PSU)
0	33.95	34.49	34.94
10	33.95	34.49	34.81
20	33.98	34.49	34.77
30	34.06	34.50	34.75
50	34.20	34.53	34.74
75	34.33	34.56	34.77
100	34.32	34.62	34.80
125	34.38	34.70	34.83
150	34.51	34.74	34.85
200	34.57	34.69	34.81
250	34.47	34.60	34.70
300	34.44	34.55	34.64
400	34.48	34.54	34.58
500	34.52	34.55	34.59
600	34.54	34.56	34.58
700	34.55	34.56	34.57
800	34.56	34.56	34.57
900	34.57	34.57	34.57
1000	34.57	34.58	34.58
1100	34.58	34.58	34.59
1200	34.58	34.59	34.61
1300	34.59	34.61	34.62
1400	34.61	34.63	34.64

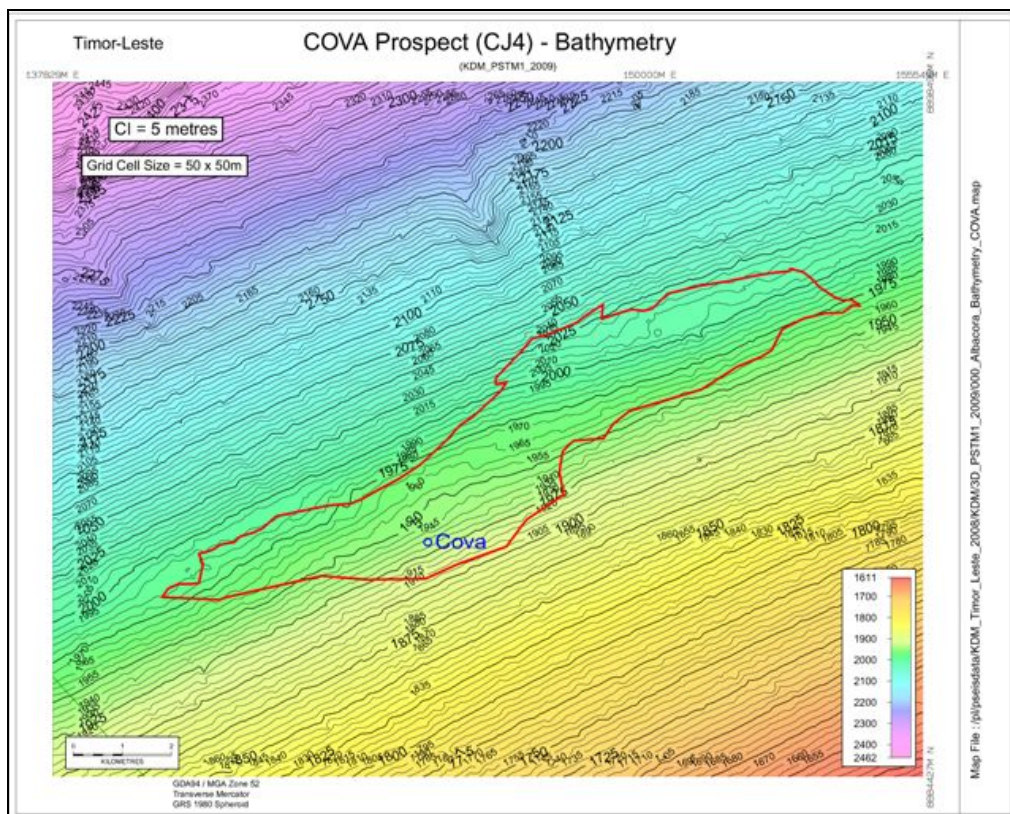
## Bathymetry

The proposed Cova-1 exploration well is located on the continental slope in an area of uniformly smooth seabed ranging in depth 1,900m to 1,950m (Figure 3.6). To the north the continental slope continues to decline steadily reaching depths in excess of 2,500m in the Timor Trough.

Approximately 80km to the south of the proposed Cova-1 well, the Sahul Shelf extends approximately 300km out from and runs parallel to the northern Australian coastline (Figure 3.7). A system of shoals occurs to the south and southwest of the Cova-1 location (Figure 3.7). The system stretches for approximately 60km in a northeast/southwest direction along the outer edge of the Sahul Shelf and comprises 11 major shoals ranging in size from 0.05km<sup>2</sup> to 40km<sup>2</sup>, with an average size of 4.6km<sup>2</sup> (Heyward *et. al.* 1997). The banks rise sharply above the continental slope from more than 300m to between 16m to 30m below the sea surface. The nearest, Big Bank Shoals, is located approximately 80km southwest of Cova-1 and rises to within 21m lowest astronomical tide (LAT).

The nearest emergent reefs, Ashmore, Cartier and Hibernia, are located on the southwest end of Sahul Shelf. The nearest, Hibernia reef, is more than 300km to the southwest of Cova-1. The nearest shoreline is the southern coastline of Timor-Leste, located approximately 90km to the northwest.





**Figure 3.6 Bathymetry of the Cova well location**

**Figure 3.7 Regional bathymetry**

### 3.1.3 Seismicity and Tsunamis

The Timor Sea has been tectonically active for at least the past six million years where the Australian and Eurasian continental plates converge. Since the mid 1970s, hundreds of earthquakes have been recorded in the region. Many of the earthquakes in the Australian sector of the Timor Sea are of relatively low magnitude occurring around the edges of the Cartier and Timor Troughs.

Subduction earthquakes, caused by one edge of a crustal plate being forced below the edge of another, associated with the Timor Trough dominate the earthquakes of the area. Earthquake activity within the central Timor Trough and the island of Timor is a lot more intense, more frequent and generally of a magnitude greater than seven on the Richter scale (AUSGEO 2003).

The proposed Cova well is located in the southern part of the Timor Trough on the Australian continental plate, which is subducting to the north under Timor. The subduction zone is steeply dipping with the rate of activity along the subduction zone appearing to be greatest to the east (towards the Banda Sea) than to the west (towards Sumbawa). There appears to be an absence of seismicity to the northwest of the Cova well, although this may not be a long-term feature of the seismicity of the area.

At the Timor Trough, subduction-zone earthquakes are shallow at the offshore trench and are deepest to the north, with most subduction earthquakes occurring at depths down to approximately 200km. Few events occur between 300km and 500km depth, although some events do occur at depths exceeding 600km. Events deeper than 300km are too deep to create damage at the surface for major engineered structures.

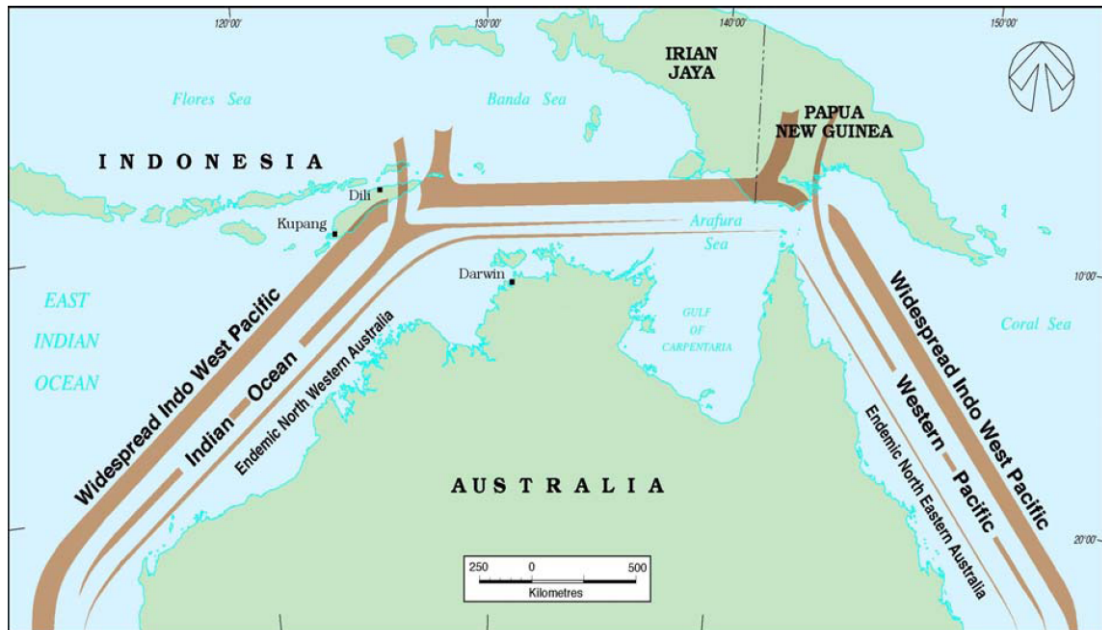
## 3.2 BIOLOGICAL ENVIRONMENT

### 3.2.1 Regional Overview

Physical, biological and environmental data for the marine and coastal environment in Timor-Leste is very scarce (Sandlund *et. al.* 2001) hence referral has to be made to isolated or more general studies. The marine fauna of the Timor Sea is part of the Indo-West Pacific biogeographical province (Figure 3.8). The majority of species are widely distributed in this region (Wilson & Allen 1987). Timor-Leste has been identified as part of the Wallacea region (relating mainly to the terrestrial environment) in Southeast Asia which has been identified as a biodiversity “hotspot” (CI 2007). The most ecologically important marine habitats in the Timor Sea region, in terms of biodiversity and productivity can be grouped into:

- various submerged banks or shoals on the northern Australian continental shelf and shelf slope;
- coastal intertidal coral reefs and shallow (20m to 30m) reefs; and
- mangrove and seagrass areas located along the Timor-Leste and northern Australian coast and islands (Sandlund *et. al.* 2001; SKM 2001).





**Figure 3.8 Indo-West Pacific biogeographical province**

### 3.2.2 Bathypelagic Zone

The Cova-1 well is situated in approximately 1,900m of water in the Timor Trough. The Timor Trough, in which the drilling program is located, is classified as the bathypelagic zone (defined as between 1,000m and 4,000m deep). Sunlight does not penetrate the bathypelagic zone and bioluminescence is the only light. Despite the lack of light, the biota of the bathypelagic zone is diverse and sperm whales (*Physeter macrocephalus*) are capable of diving to the bathypelagic zone to feed on deep sea cephalopods and other megafauna.

As no plants can grow in the bathypelagic zone because of lack of light, the fauna are carnivorous, catching in their wide jaws the falling debris of the organisms which exist above them. Fish are common in the bathypelagic zone, typically feeding by ambushing prey or by attracting prey using bioluminescent lures. Due to the relatively small changes in pressure with depth, fish inhabiting the bathypelagic zone can move freely over wide depth changes without being affected by pressure changes. As such, fish species occurring in the bathypelagic zone would be expected to occur over wide depth and geographical ranges.

Benthic invertebrates inhabiting the seabed would be expected to exhibit high diversity though low abundance and productivity due to the water depth, lack of light and reliance on detrital "rain" to drive deep sea ecosystems. Infaunal assemblages would be expected to be dominated by polychaete worms and crustaceans as is typical of marine infaunal assemblages elsewhere including those of continental shelf and slope habitats of the Timor Sea.

### 3.2.3 Continental Shelf

Across the northern continental shelf, the predominant animals living within seabed sediments (infauna) are polychaetes (burrowing worms) and crustaceans (e.g. prawns, shrimp and crabs). These two groups comprise 84% of the total species in sediment samples with a high diversity of species but a low abundance of each individual species (Heyward *et. al.* 1997). The remaining 16% of species include echinoderms (e.g. sea stars, sea urchins, feather stars), molluscs (both gastropods and bivalves), nemertean (ribbon worms), sponges and fish.

Epibenthic communities (animals living on the seabed) in deeper waters are generally low in fauna abundance and diversity. Heyward *et. al.* (1997) noted that with little sea floor topography and hard substrate, such areas offered minimal habitat diversity or niches for animals to occupy. The main taxa found in these areas include sponges and gorgonians (sea whips and sea fans). The absence of hard substrate is considered a limiting factor for the recruitment of epibenthic organisms (Heyward & Smith 1996).

Whilst the abundance may be low, the diversity of shelf slope invertebrates may, however, be high. A wide variety of crustaceans including scampi, prawns, carids, bugs and crabs are regularly recorded from commercial deepwater trawl catches in the North West Shelf Trawl Fishery and that the additional non commercial crustacean captures included hundreds of species (Caton & McLoughlin 1999). The continental slope of the Timor Sea can be expected to support similar crustacean diversity.

### 3.2.4 Sea Mounts and Shoals

The proposed Cova-1 program occurs to the north of a number of mostly unnamed sea mounts and the Sahul Shoals. On shoals in less than 50m water depth (where adequate light may penetrate), epibenthic fauna can be abundant and diverse. These areas are of ecological significance due to their regional uniqueness and their patchy distribution in an otherwise broad area of featureless seafloor.

The major shoals and banks in the region include:

- Karmt Shoals (approximately 110km to the south-southeast of the proposed Cova-1 exploration well);
- Big Bank Shoals (approximately 85km to the south-southeast of the proposed Cova-1 exploration well); and
- Echo Shoals (approximately 160km to the east-southeast of the proposed Cova-1 exploration well).

The nearest shoals to the Cova well, Big Bank Shoals were surveyed extensively by Heyward *et. al.* (1997). The Big Bank Shoals comprise thirteen banks which vary in their habitat and species composition, but are generally characterised by mixed Halimeda algae, sponge and soft coral communities with some hard corals on the more consolidated sediments. Halimeda or coral dominate ecosystems on the shallower banks and filter-feeding ecosystems dominate the deeper banks. It is not clear why some of these banks are coral-dominated while others are Halimeda-dominated. However, depth and light attenuation seem to play key roles.

South of the Sahul Shelf system lies extensive shelf flats of depths varying from 70m to about 100m. These soft sand-silty seafloors are generally flat and undulating with a sparse assemblage of species. Species present are mainly polychaetes and crustaceans, with sponges, ascidians, echinoderm, gorgonians or soft corals depending on depth and local sediment characteristics (Lavering 1993; Marsh & Marshall 1983).

### 3.2.5 Coral reefs

Timor-Leste is near the centre of the global region with the highest coral species diversity and there may be in excess of 500 species of coral occurring in Timor-Leste waters (Veron & Stafford-Smith 2000). A series of surveys conducted in Indonesian waters between 1990 and 1998 (Burke *et. al.* 2002) determined that the percentage of coral reefs in good or excellent condition (live coral cover of more than 50%) in eastern Indonesia were 45% compared to only 23% in western Indonesia. Burke *et. al.* (2002) also identified a number of coral reefs along the Timor-Leste coast, including five distinct communities along the south coast of Timor-Leste, that were considered to be at Medium to High risk of impact from the combined effects of coastal development, marine-based pollution, sedimentation, overfishing and destructive fishing.

Intertidal reefs and islands occur along the south coast of Timor-Leste. Wyatt (2004) surveyed a small area of the nearshore coastal marine environment on the south coast. Brittle stars (ophiuroids) and other mobile organisms as well as a total of 27 taxa of sessile organisms were identified as inhabiting the reef platform. Of the sessile organisms, 18 taxa were algae (a brown alga *Ascidium* sp. and a green alga *Caulerpa* sp.), three sponges (poriferans), two hard corals (scleractinians), two ascidians, one anemone (cnidarian) and one foraminifer.

Most of the coastline adjacent to the Cova-1 well site area is identified as “sand”, with two coral reef communities present:

- a coral reef zone extending 10km east from Betano; and
- reef immediately adjacent to the point at Suai.

Aerial observations of the south coast coral reefs, during helicopter transfers as part of Eni's Albacora 3D survey indicate that the fringing reefs do not extend further than 100m from shore (Eni 2008).

The nearest emergent offshore coral reefs, Ashmore, Cartier and Hibernia, are located on the southwest end of Sahul Shelf. The nearest, Hibernia reef, is more than 380km to the southwest of Cova-1.

### 3.2.6 Plankton

The seas around Australia contain a relatively low biomass of zooplankton, which reach a maximum in an up-welling area between the northwest coast of Australia and Indonesia (generally during the July-August period related to the southeast Monsoonal winds) (Tranter 1962). Zooplankton, which feeds on phytoplankton, provides an important food source to larger animals such as whales, fish and crustacea.

Zooplankton biomass was found to be in the range of 65mg/m<sup>3</sup> – 155mg/m<sup>3</sup> (Heyward *et. al.* 1997). Plankton samples taken from the Big Bank Shoals revealed diverse and abundant assemblages. Samples indicated a population of an average of 31,000 individuals representing 20 to 30 taxa, while abundance at sites away from the bank averaged approximately 17,000 individuals. Planktonic crustaceans that feed on phytoplankton were the most prevalent taxa. A copepod (Crustacean) from the Family Paracalanidae was the most abundant zooplankton encountered. These results are consistent with those of extensive surveys conducted by Tranter (1962). The higher abundance of zooplankton in samples over the Big Bank Shoals appears to be a feature of these ecosystems. Given its deep water location, remote from any seamounts or shoals, the zooplanktonic assemblage of the Cova-1 well location is expected to be considerably lower than that recorded at the Big Bank Shoals.

### 3.2.7 Marine Mammals

A number of whale, dolphin and porpoise species are likely to be encountered during the Cova-1 drilling program, with the Timor Trench providing an important flow-through of species connecting the Pacific and Indian Oceans. The Australian Environment Protection and Biodiversity Conservation (EPBC) Protected Matters Database was searched to determine whether species listed for protection under the Australian *EPBC Act 1999* (EPBC Act) potentially occurred in the Timor Sea and in particular in the region in which the proposed Cova-1 well is located. The EPBC Protected Matters Database search indicated that twenty-two whale and dolphin species could potentially occur in the Timor Sea near the Cova-1 well. Of these, the Pygmy Killer Whale (*Feresa attenuata*), Killer Whale (*Orcinus orca*), False Killer Whale (*Pseudorca crassidens*), Common Dolphin (*Delphinus delphis*) and the Bottlenose Dolphin (*Tursiops truncatus*) are likely to occur near Cova-1.

Humpback Whales (*Megaptera novaeangliae*) are not expected to occur close to Cova-1 but are known to occur near the Australian mainland coast during their migratory cycle. Calving grounds for humpback whales were identified in Camden Sound, near the Kimberley coast, by Jenner *et. al.* (2001). The Humpback Whale migration path along the western coast of Australia terminates at a known breeding area in the coastal waters of the Bonaparte Archipelago and bays of the Kimberley coast over 300km to the south of Cova. During their northern migration, during late July to early August, Humpback Whales may migrate through waters up to several hundred kilometres offshore but are not likely to be encountered as far north as the Cova-1 well.

Marine mammal observations from Eni's Albacora 3D seismic survey by dedicated Marine Mammal Observers (MMO) provided an insight into the distribution of whales and dolphins in the Timor Sea. In September 2007, observations were made over 22 days, recording a total of 23 sightings of cetaceans comprising approximately 96 individuals (Western Whale Research 2007). These included 13 pods of Pygmy blue whales, *Balaenoptera musculus brevicauda*, and 8 pods of unidentified large whales (most likely to be Pygmy blue whales). Two pods of unidentified dolphins totalling 70 individuals were also observed. Given the large survey coverage over deep water (up to 2,500m) and short observation duration of 22 days (with excellent weather) this number of sightings is considered to be high and of very high importance to marine science.

In contrast, the MMO effort for the 3D Seismic Survey in December 2007 observed relatively low numbers of sightings in the Timor Sea (Eni 2008). Over 13 days, a total of four sightings of cetaceans comprising 16 individuals were recorded. These included one unidentified whale, one sighting of two Fraser's dolphins and two pods of unidentified dolphins. An explanation of the low numbers may be the different seasonal conditions (from Winter/Spring to Spring/Summer) and a change in surveying area from predominantly deep to shallower water (500m).

Dugongs (*Dugong dugon*) occur within Timor-Leste waters, in protected areas coinciding with sizeable seagrass beds. Given its distance offshore and water depth, dugongs are unlikely to be encountered at the Cova-1 well site.

### 3.2.8 Reptiles

#### Turtles

The tropical Indo-Pacific region supports marine turtles and sea snakes. Marine turtles include the threatened Flatback Turtle (*Natator depressus*), Green Turtle (*Chelonia mydas*), Hawksbill Turtle (*Eretmochelys imbricata*) and Leatherback Turtle (*Dermochelys coriacea*). The Loggerhead Turtle (*Caretta caretta*) and Olive Ridley Turtle (*Lepidochelys olivacea*) also occur in the region and are listed as endangered.

There are no turtle nesting sites or other critical habitat (e.g. breeding or feeding sites) identified within the Timor-Leste coastline adjacent to the Cova-1 well (UNEP-WCMC 2006). However, Jaco Island and Tutuala beach have been identified as turtle nesting sites (Nunes 2001) and other breeding sites may exist on the south coast of Timor-Leste where the appropriate conditions exist.

### **Saltwater Crocodiles**

The distribution of the saltwater crocodile, *Crocodylus porosus*, encompasses Timor-Leste and the islands and coasts surrounding the Timor Sea. The animals usually inhabit territories within tidal river systems and estuaries, sometimes around coastal areas and in freshwater rivers or water bodies (Ross 1998). The saltwater crocodile is unlikely to be encountered during the drilling of the Cova-1 well.

### **Sea Snakes**

Sea snakes are very common in subtropical and tropical waters where they occupy a wide range of habitats and water depths, extending from the coast to the reefs and banks further offshore. Sea snakes are expected in the Timor Sea region, with as many as 15 species known to occur in northern Australian waters (Storr *et. al.* 1986). Sea snakes are unlikely to be encountered during the drilling of the Cova-1 well.

#### **3.2.9 Fish**

FishBase (2006) lists 144 marine fish species in 38 families for Timor-Leste waters, with one species, the Bigeye Tuna (*Thunnus obesus*) listed as Threatened, 18 of the species as being pelagic and 10 of the species as being deep water. Many of the species listed for Timor-Leste are found throughout the tropics and are important commercial species, such as the tunas, mackerels and snappers.

Fish densities in the region of the drilling programme are likely to be low, with some pelagic species traversing the area. However waters with greater fish abundance are likely to occur in the shallow, coastal fringe and around reefs and shoals on the edge of the continental shelf (CSIRO 1999a). The broader area of the Timor Sea region supports pelagic fish species that are utilised in traditional and commercial fisheries.

The region supports large populations of cartilaginous fishes such as sharks and rays. The most prolific of the sharks are the whalers, represented by at least twelve species in the region. They are common in all environments and the oceanic white tipped sharks (*Carcharhinus longimanus*) occur in the deeper offshore areas. Whale sharks may occur occasionally in the permit area, although little is known of their movements through the region.



### 3.2.10 Birds

Timor-Leste has approximately 224 species of birds of which 23 are endemic to the Timor island group (World Bank 2005). Of the known species that occur in Timor-Leste, two are listed as critically endangered and three are listed as endangered under the IUCN Red List. Of these birds, only the Christmas Island Frigatebird, *Fregata andrews* is a seabird.

Birdlife at the Cova well location is expected to be limited given the oceanic environment. A large variety of seabird species are expected to migrate across the region or forage within the coastal waters of the Timor Sea. Shoreline species may pass through these areas during migrations or enter for short periods during foraging. Seabirds that may occur in the Cova-1 well area includes various tern species, the silver gull (*Larus novaehollandiae*), the lesser frigate bird (*Fregata ariel*), the common noddy (*Anous stolidus*) and the migratory seabird, the streaked shearwater (*Calonectris leucomelas*).

In a systematic survey of seabird distribution in the eastern Indian Ocean carried out in 1995 (Dunlop *et al.* 1995) it was found that seabird distributions were generally very patchy except near islands where shelter and anomalies in surface water concentrated food seasonally. For example, Ashmore Reef (located over 380km to the southwest of Cova-1) is a significant staging point for wading birds migrating between Australia and the northern hemisphere, including forty-three species listed on one or both of CAMBA and JAMBA.

Ashmore Reef supports extremely high concentrations of breeding seabirds, many of which are nomadic and typically breed on small isolated islands. CSIRO (1999b) recorded over 10,000 seabirds of nine species on Ashmore Reef and at sea within the Timor MOU74 (Memorandum of Understanding) Box during a survey between September and October, 1998. These species are listed in Table 3.5.

**Table 3.5 Seabirds species on Ashmore Reef and at sea within the Timor MOU74 Box during a survey between September and October, 1998 (CSIRO 1999b)**

Common name	Scientific name
Crested Tern	<i>Sterna bergii</i>
Sooty Tern	<i>Sterna fuscata</i>
Roseate Tern	<i>Sterna dougalli</i>
Common Noddy	<i>Anous stolidus</i>
Brown Booby	<i>Sula leucogaster</i>
Masked Booby	<i>Sula dactylatra</i>
Bulwer's Petrel	<i>Bulweria bulwerii</i>
Matsudaira's Storm-Petrel	<i>Oceanodroma matsudairae</i>
Leach's Storm-Petrel	<i>Oceanodroma leucorhoa</i>



### 3.2.11 Mangroves

Mangroves occupy approximately 7,500 acres along the coastline of Timor-Leste. On the south coast, they tend to form small communities at the mouths of streams and in marshy or swampy terrain (timorNET, 2007).

The mangroves species that occur along the coast of Timor-Leste include, *Bruguiera parvifolia*, *Sonneratia alba*, *Rhizophora conjugata*, *Excoecaria agallocha*, *Avicennia marina*, *Aegiceras corniculatum*, *Acanthus ilicifolius*, *Lumnitzera racemosa*, *Heritiera littoralis*, *Acanthus ilicifolius*, *Achrosticum aureum*, *Xylocarpus granatum*, *Corypha utan*, *Pandanus odoratissimus*, *Cycas circinalis*, *Dolichandrone spathacea* and *Melaleuca leucadendron* (timorNET, 2007).

### 3.2.12 Conservation Significant Biological Resources

There are a number of threatened and/or migratory species listed under the EPBC Act that regularly use the Timor Sea. A search of Australia's Department of the Environment, Water, Heritage and the Arts' Protected Matters Database (<http://www.environment.gov.au/erin/ert/epbc>) indicated that there may be as many as 74 species listed under the EPBC occurring within a 100km radius of the proposed Cova well, including two endangered six vulnerable and fourteen migratory species (Table 3.6). Many of these species are also listed under international conventions such as the *Convention on International Trade in Endangered Species* (CITES), *Convention on Migratory Species* (CMS), JAMBA, CAMBA, the *International Union for the Conservation of Nature* (IUCN) Red List or the *United Nations Convention on the Law of the Sea* (UNCLOS).

The fourteen migratory species are widely distributed oceanic species and hence are listed for this region on the EPBC Act database. There are no particular natural seabed, oceanographic or topographic features that would attract any of these wide ranging species to the proximity of the drilling location. The proposal is not likely to affect the movement of any of these species through the area during their migration.

Similarly, the eight threatened species are widely distributed oceanic species and hence are listed for this region on the EPBC Act database. While some of the whale and shark species may breed or feed in the region, there are no known features that would make the area particularly attractive to these species and the conditions are widely represented on the tropical continental shelf of Australia and elsewhere in the tropics. Although turtles may occur in the area during their oceanic migrations, the drilling campaign is not likely to affect any local populations of these species. There is no suitable habitat for turtle nesting for hundreds of kilometres. The Cova well does not involve any processes that may threaten the breeding, feeding or general migration of any of the listed threatened species.

The remaining listed species are widely distributed marine pipefish, seahorse, turtles and seasnake species. Many of the pipefish and seasnake species may occur, feed and breed in the Timor Sea where there are appropriate habitats e.g. in shallow, coastal fringes and around reefs and shoals on the edge of the continental shelf.

**Table 3 6: Protected marine species listed under EPBC Act potentially occurring within a 100km radius of the proposed Cova well location (EPBC Protected Matters Database Search)**

Common name	Scientific name	Distribution	Conservation status
<b>Threatened Species</b>			
<b>Mammals</b>			
Blue whale	<i>Balaenoptera musculus</i>	Open ocean, world-wide distribution. Considered to be endangered. Occasional visitor to region.	Endangered* (EPBC Act) Migratory*** (CMS)
Humpback whale	<i>Megaptera novaeangliae</i>	Considered to be endangered. Known migration path not near proposed development site.	Vulnerable** (EPBC Act), (CITES) Migratory*** (CMS)
<b>Reptiles</b>			
Loggerhead turtle	<i>Caretta caretta</i>	Global distribution in tropical, subtropical and temperate waters.	Endangered* (EPBC Act), (CITES) Migratory*** (CMS)
Leatherback turtle	<i>Dermochelys coriacea</i>	Global tropical and temperate distribution, largest populations in Atlantic, Pacific and Indian Oceans and Caribbean Sea.	Endangered* (EPBC Act), (CITES) Critically endangered (IUCN) Migratory*** (CMS)
Green turtle	<i>Chelonia mydas</i>	Global distribution including tropical waters of Northern Australia.	Vulnerable** (EPBC Act), (CITES) Migratory*** (CMS)
Hawksbill turtle	<i>Eretmochelys imbricata</i>	Global distribution in tropical, subtropical and temperate waters, largest populations occur in Australian waters.	Vulnerable** (EPBC Act), (CITES) Migratory (CMS)
Flatback turtle	<i>Natator depressus</i>	Restricted to Australian and Indonesian waters, all known nesting beaches occur in Australia.	Vulnerable** (EPBC Act), (CITES) Migratory*** (CMS)
<b>Fish</b>			
Whale sharks	<i>Rhincodon typus</i>	Broad distribution between latitudes 30° N and 35° S in tropical and warm temperate seas, both oceanic and coastal settings.  Circum-Australia but most common in waters off northern Western Australia, Northern Territory and Queensland.	Vulnerable** (EPBC Act) (IUCN) Migratory*** (CMS) (UNCLOS)

Common name	Scientific name	Distribution	Conservation status
<b>Migratory Species</b>			
Birds			
Streaked shearwater	<i>Calonectris leucomelas</i>	Northern Territory and eastern coastline of Australia.	Migratory*** (EPBC Act) (JAMBA/CAMBA) Marine species (EPBC Act)
<b>Marine Species</b>			
Cetaceans			
Antarctic Minke Whale, Dark-shoulder Minke Whale	<i>Balaenoptera bonaerensis</i>	Throughout the Southern Hemisphere. Recorded in all Australian states except Northern Territory.	Migratory*** / marine species (EPBC Act) No category assigned, but possibly secure
Bryde's Whale	<i>Balaenoptera edeni</i>	Temperate to tropical waters, both oceanic and inshore.	Migratory*** (EPBC Act) (CMS) (CITES) Marine species (EPBC Act)
Killer Whale	<i>Orcinus orca</i>	Global and circum-Australia.	Migratory*** (EPBC Act) (CMS) (CITES) Marine species (EPBC Act) No category assigned but probably secure
Sperm Whale	<i>Physeter macrocephalus</i>	Global in deep waters in all oceans and confluent seas. Circum-Australia.	Vulnerable** (EPBC Act) (IUCN) Migratory*** (EPBC Act) (CMS) (CITES) Marine species (EPBC Act)
Spotted Bottlenose Dolphin	<i>Tursiops aduncus</i>	Tropical and sub-tropical coastal and shallow offshore waters of the Indian Ocean, Indo-Pacific Region and the western Pacific Ocean. Circum-Australia.	Migratory*** (EPBC Act) (CMS) (CITES)
Pygmy Killer Whale	<i>Feresa attenuata</i>	Global in tropical and subtropical oceanic waters. Circum-Australia.	Migratory*** (CMS)
False Killer Whale	<i>Pseudorca crassidens</i>	Global in deep tropical and temperate waters. Circum-Australia.	Migratory*** (CMS)
Dwarf Sperm Whale	<i>Kogia simus</i>	Primarily occurs over the continental shelf and slope off tropical and temperate coasts of all oceans. Circum-Australia.	Cetacean (EPBC Act) (CITES)

Common name	Scientific name	Distribution	Conservation status
Pygmy Sperm Whale	<i>Kogia breviceps</i>	Global tropical and temperate oceans, mostly beyond the edge of the continental shelf. Circum-Australia.	Cetacean (EPBC Act) (CITES)
Short-finned Pilot Whale	<i>Globicephala macrorhynchus</i>	Tropical and warm-temperate waters world-wide. Circum-Australia.	Cetacean (EPBC Act) (CITES)
Minke Whale	<i>Balaenoptera acutorostrata</i>	Tropical and warm-temperate waters of the Southern Hemisphere. Western, southern and eastern Australian waters.	Cetacean (EPBC Act)
Melon-headed Whale	<i>Peponocephala electra</i>	All deep oceanic waters between 35° N and 35° S. Australian temperate and tropical waters.	Cetacean (EPBC Act) (CITES)
Risso's Dolphin	<i>Grampus griseus</i>	Tropical, subtropical, temperate and subantarctic waters between 60° N and 60° S. Circum-Australia	Cetacean (EPBC Act) (CITES)
Bottlenose Dolphin	<i>Tursiops truncatus</i>	Global temperate and tropical waters. Circum-Australia	Migratory*** (CMS) (CITES)
Spinner Dolphin	<i>Stenella longirostris</i>	Pelagic zone of tropical, subtropical and, less frequently, in warm temperate waters in the Indian, Pacific and Atlantic Oceans. South-western Australia northwards to south-eastern Australia.	Migratory*** (CMS) (CITES)
Striped Dolphin	<i>Stenella coeruleoalba</i>	Temperate to tropical species. South-western Australia northwards to south-eastern Australia.	Cetacean (EPBC Act) (CITES)
Spotted Dolphin	<i>Stenella attenuata</i>	Pantropical oceanic tropical zones between about 40° N and 40° S. South-western Australia northwards to south-eastern Australia.	Cetacean (EPBC Act) (CITES)
Common Dolphin	<i>Delphinus delphis</i>	Tropical, subtropical and temperate in offshore waters of the Atlantic, Pacific and Indian Oceans. All Australian states and territories though less common in northern Australia.	Migratory*** (CMS) (CITES)
Rough-toothed Dolphin	<i>Steno bredanensis</i>	Deep oceanic tropical to subtropical waters. Recorded off Western Australia, Northern Territory, Queensland and New South Wales.	Cetacean (EPBC Act) (CITES)

Common name	Scientific name	Distribution	Conservation status
Cuvier's Beaked Whale, Goose-beaked Whale	<i>Ziphius cavirostris</i>	Worldwide distribution in all temperate and tropical waters. Circum-Australia	Cetacean (EPBC Act) (CITES)
Reptiles			
Horned Seasnake	<i>Acalyptophis peronii</i>	Tropical northern Australia, Coral Sea Islands, New Caledonia, Papua New Guinea, Thailand and Hong Kong.	Marine species (EPBC Act)
Dubois' Seasnake	<i>Aipysurus duboisii</i>	Indo-Pacific: from Australia to New Guinea and New Caledonia. Tropical northern Australia.	Marine species (EPBC Act)
Leaf-scaled Seasnake	<i>Aipysurus foliosquama</i>	East Indian Ocean; West Central Pacific; Southwest Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Olive Seasnake	<i>Aipysurus laevis</i>	Indo-Pacific, Northwest Atlantic and the Mediterranean. Tropical northern Australia.	Marine species (EPBC Act)
Stokes' Seasnake	<i>Astrotia stokesii</i>	Indo-Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Spectacled Seasnake	<i>Disteira kingii</i>	Indo-West Pacific. Western and northern Australia.	Marine species (EPBC Act)
Olive-headed Seasnake	<i>Disteira major</i>	Indo-West Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Turtle-headed Seasnake	<i>Emydocephalus annulatus</i>	Indo-West Pacific, Northwest Atlantic and the Mediterranean. North western and north eastern Australia	Marine species (EPBC Act)
Beaked Seasnake	<i>Enhydrina schistosa</i>	Indo-West Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Black-headed Seasnake	<i>Hydrophis atriceps</i>	Indo-West Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Slender-necked Seasnake	<i>Hydrophis coggeri</i>	Northeast Atlantic, Mediterranean and Indo-West Pacific. North western Australia	Marine species (EPBC Act)
Elegant Seasnake	<i>Hydrophis elegans</i>	Indo-West Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Plain seasnake	<i>Hydrophis ornatus</i>	Northeast Atlantic, Mediterranean and Indo-Pacific. Tropical northern Australia.	Marine species (EPBC Act)

Common name	Scientific name	Distribution	Conservation status
Spine-bellied Seasnake	<i>Lapemis hardwickii</i>	Indo-West Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Yellow-bellied Seasnake	<i>Pelamis platurus</i>	Global tropical waters. South-western Australia northwards to south-eastern Australia.	Marine species (EPBC Act)
Ray Finned Fishes			
Corrugated Pipefish, Barbed Pipefish	<i>Bhanotia fasciolata</i>	Eastern Indian Ocean and Western Pacific. North western Australian waters.	Marine species (EPBC Act)
Three-keel Pipefish	<i>Campichthys tricarinatus</i>	Western Central Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Pacific Short-bodied Pipefish, Short-bodied Pipefish	<i>Choeroichthys brachysoma</i>	Indo-Pacific: Red Sea and East Africa to the Society Islands, north to the Philippines and Guam, south to northern Australia.	Marine species (EPBC Act)
Pig-snouted Pipefish	<i>Choeroichthys suillus</i>	Western Central Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Fijian Banded Pipefish, Brown-banded Pipefish	<i>Corythoichthys amplexus</i>	Indo-West Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Yellow-banded Pipefish, Network Pipefish	<i>Corythoichthys flavofasciatus</i>	Indo-Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Australian Messmate Pipefish, Banded Pipefish	<i>Corythoichthys intestinalis</i>	Western Central Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Schultz's Pipefish	<i>Corythoichthys schultzi</i>	Indo-Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Roughridge Pipefish	<i>Cosmocampus banneri</i>	Indo-West Pacific. North western Australian waters.	Marine species (EPBC Act)
Ringed Pipefish	<i>Doryrhamphus dactyliophorus</i>	Indo-Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Indian Blue-stripe Pipefish, Blue-stripe Pipefish	<i>Doryrhamphus excisus</i>	Indo-Pacific and Eastern Pacific. Tropical northern Australia.	Marine species (EPBC Act)



Common name	Scientific name	Distribution	Conservation status
Cleaner Pipefish, Janss' Pipefish	<i>Doryrhamphus janssi</i>	Western Central Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Tiger Pipefish	<i>Filicampus tigris</i>	Eastern Indian Ocean and Western Pacific. Northwestern, eastern and southern Australian waters.	Marine species (EPBC Act)
Brock's Pipefish	<i>Halicampus brocki</i>	Western Pacific. Western and northern Australian waters.	Marine species (EPBC Act)
Red-hair Pipefish, Duncker's Pipefish	<i>Halicampus dunckeri</i>	Indo-West Pacific Tropical northern Australia.	Marine species (EPBC Act)
Mud Pipefish, Gray's Pipefish	<i>Halicampus grayi</i>	Indo-West Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Spiny-snout Pipefish	<i>Halicampus spinirostris</i>	Indo-Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Ribboned Seadragon, Ribboned Pipefish	<i>Hallichthys taeniophorus</i>	Indo-Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Beady Pipefish, Steep-nosed Pipefish	<i>Hippichthys penicillus</i>	Indo-West Pacific. Northwestern, northern and eastern Australian waters.	Marine species (EPBC Act)
Spiny Seahorse	<i>Hippocampus hystrix</i>	Indo-Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Spotted Seahorse, Yellow Seahorse	<i>Hippocampus kuda</i>	Indo-Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Flat-face Seahorse	<i>Hippocampus planifrons</i>	Indo-Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Hedgehog Seahorse	<i>Hippocampus spinosissimus</i>	Indo-Pacific. Tropical northern Australia.	Marine species (EPBC Act)
Tidepool Pipefish	<i>Micrognathus micronotopterus</i>	Western Pacific. Northwestern Australian waters.	Marine species (EPBC Act)
Pipehorse	<i>Solegnathus hardwickii</i>	Western Indian Ocean. Tropical northern Australia.	Marine species (EPBC Act)
Indonesian Pipefish, Gunther's Pipehorse	<i>Solegnathus lettiensis</i>	Eastern Indian Ocean. Western Australian waters.	Marine species (EPBC Act)

Common name	Scientific name	Distribution	Conservation status
Blue-finned Ghost Pipefish, Robust Ghost Pipefish	<i>Solenostomus cyanopterus</i>	Indo-Pacific. Northwestern, northern and eastern Australian waters.	Marine species (EPBC Act)
Double-ended Pipehorse, Alligator Pipefish	<i>Syngnathoides biaculeatus</i>	Indo-Pacific. Western, northern and eastern Australian waters.	Marine species (EPBC Act)
Bend Stick Pipefish, Short-tailed Pipefish	<i>Trachyrhamphus bicoarctatus</i>	Indo-West Pacific. Northwestern, northern and eastern Australian waters.	Marine species (EPBC Act)
Long-nosed Pipefish, Straight Stick Pipefish	<i>Trachyrhamphus longirostris</i>	Indo-West Pacific. Tropical northern Australia.	Marine species (EPBC Act)
<p><b>*Endangered</b> = An action has, will have, or is likely to have a significant impact on a critically endangered or endangered species if it does, will, or is likely to:</p> <ul style="list-style-type: none"> <li>• lead to a long-term decrease in the size of a population, or</li> <li>• reduce the area of occupancy of the species, or</li> <li>• fragment an existing population into two or more populations, or</li> <li>• adversely affect habitat critical to the survival of a species, or</li> <li>• disrupt the breeding cycle of a population, or</li> <li>• modify, destroy, remove, isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline, or</li> <li>• result in invasive species that are harmful to a critically endangered or endangered species becoming established in the endangered or critically endangered species' habitat*, or</li> <li>• interfere with the recovery of the species.</li> </ul>			
<p><b>**Vulnerable</b> = An action has, will have, or is likely to have a significant impact on a vulnerable species if it does, will, or is likely to:</p> <ul style="list-style-type: none"> <li>• lead to a long-term decrease in the size of an important population of a species, or</li> <li>• reduce the area of occupancy of an important population, or</li> <li>• fragment an existing important population into two or more populations, or</li> <li>• adversely affect habitat critical to the survival of a species, or</li> <li>• disrupt the breeding cycle of an important population, or</li> <li>• modify, destroy, remove or isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline, or</li> <li>• result in invasive species that are harmful a vulnerable species becoming established in the vulnerable species' habitat*, or</li> <li>• interferes substantially with the recovery of the species.</li> </ul>			

Common name	Scientific name	Distribution	Conservation status
<p>***Migratory = Listed migratory species include species listed in:</p> <ul style="list-style-type: none"> <li>• appendices to the Bonn Convention (Convention on the Conservation of Migratory Species of Wild Animals) for which Australia is a Range State under the Convention;</li> <li>• CAMBA; and</li> <li>• JAMBA.</li> </ul>			

### 3.2.13 Conservation Areas

The coastal waters surrounding Timor-Leste are considered to be included in the Coral Triangle which is a geographical term referring to the tropical marine waters of Indonesia, Malaysia, Papua New Guinea, Philippines, Solomon Islands and Timor-Leste that according to the World Wildlife Fund harbours 75% of all known coral species, more than half of the world's reefs, 40% of the world's coral reef fish species, and six of the world's seven species of marine turtle.

The nearest currently declared marine conservation zones or marine protected areas to Cova-1 well are: Jaco Island Marine Park, at the eastern end of Timor-Leste (approximately 130km northeast); the Australian Ashmore Reef National Nature Reserve (approximately 380km south-west); and the Indonesian Teluk Kupang/Pulau Kera Marine Recreation Park (approximately 220km west) (SKM 2001). All are considered to be too far away to be impacted by the drilling activities.

## 3.3 SOCIAL ENVIRONMENT

### 3.3.1 Socio-economic Profile

Timor Leste became independent in May 2002 following nearly two years under United Nations Transitional Administration in East Timor. In mid-2008, the population of Timor Leste was estimated to be 1.1 million. The current annual GDP in 2008 was estimated to be US\$2.526 billion with an annual growth rate of 12.8%. Per capita GDP adjusted for purchasing power parity is estimated at US\$2,300. Unemployment in 2006 was estimated to be 20% in rural areas and 40% in urban areas (CIA 2009).

The capital, Dili, on the north coast of Timor-Leste, is serviced by a harbour capable of taking medium sized cargo ships. The airport at Dili is capable of taking medium to large passenger and cargo aircraft (e.g. Boeing 737). The only other airstrip capable of taking similar sized aircraft is that near the town of Baucau, some 100km to the east of Dili. Baucau airport is capable of taking large passenger and cargo aircraft and has been used for military purposes.

Timor Leste has an agricultural based economy, primarily focused on subsistence farming. In 2008, 90% of the population was dependent on agriculture as a livelihood (CIA 2009). Traditionally, the East Timorese are not fishing people. Most fishing is from canoes or small boats with outboard motors that remain close to shore. Fishing is likely to be seasonal and is frequently undertaken at night or early in the morning. The Government sees great potential to increase income from fishing in the future aiming to increase fishing grounds to about 33 times that of the past. This could increase fishing activities and sea traffic both in deepwater and near coastal areas. Government plans are to increase investment in national fishing capacity and licence foreign vessels. The Government's strategy identified several key fishing areas:

- the inshore reef;
- coastal and Timor Leste shelf fisheries for demersal and small pelagic species;
- the pelagic fishery for tunas including Yellow Fin and Big Eye;
- reef fish species of the Sahul Bank in the southern region;
- deepwater trawl resources well off the south coast; and
- aquaculture including hatchery and pond production.

Although 90% of the workforce is employed in agriculture, it contributes only 32% to GDP, whereas industry and services account for 13% and 55% of GDP respectively (CIA 2009). The construction industry, and the sector which provides its supplies, is the largest employer in the private wage paying sector. The large contractors are expatriate firms and local contractors are currently only able to pre-qualify for work under US\$50,000. The only sector of potential and major significance to Timor-Leste is the oil and gas industry.

Oil and gas revenues will underpin the government's routine and development programmes in the absence of any other substantial source of revenue. The oil and gas industry may be expected to provide the following benefits to Timor-Leste:

- expansion of the economy due to increased service and supply requirements of the oil and gas industry;
- employment opportunities for a large proportion of the population;
- potential support towards the development of social development initiatives aimed at improving the quality of life of local communities;
- vocational education and training opportunities to develop a skilled workforce; and
- gas resources for domestic and industrial use in Timor Leste.

Despite significant increases in revenue due to receipts from petroleum and coffee exports, it is still the poorest country in the Asia-Pacific region and has been ranked 150 of 177 countries in the 2007 UN Human Development Index. Despite this, the country has made significant progress in building an institutional framework to support economic development and promote macroeconomic stability.

The underlying economic policy challenge the country faces remains how best to use oil-and-gas wealth to lift the non-oil economy onto a higher growth path and to reduce poverty. In June 2005, the National Parliament approved the creation of a Petroleum Fund to serve as a repository for all petroleum revenues and preserve the value of Timor-Leste's petroleum wealth for future generations.

### **3.3.2 Communities Adjacent to the Drilling Area**

The southern coastal areas of Timor-Leste adjacent to the Cova-1 well borders includes the districts of Cova Lima (population 53,000), Ainaro (52,500) and Manufahi (45,000). Within these districts, there are seven sub-districts and around seventeen sucos along the coast.

Small towns and villages are spread throughout these sucos, usually located a few kilometres inland from the coast. The two largest population centres on the coast adjacent to the drilling area are Suai (population 23,000), capital of Cova Lima district, and Betano, a coastal village in Manufahi.

### **3.3.3 Petroleum Activities**

Several offshore petroleum production facilities are located within a 200km radius of the Cova-1 field:

- the Elang-Kakatua Kakatua-North Floating Production, Storage and Offloading (FPSO) facility, producing export condensate;
- the Northern Endeavour FPSO, producing export oil from the Laminaria-Coralina condensate field;
- the Jabiru Venture FPSO, producing export oil; and
- the Challis Venture FPSO, producing export oil.

In addition, Eni's proposed Kitan Development is located approximately 80km south-southeast of the Cova-1 well. The Kitan Development is expected to commence production in 2011.

### **3.3.4 Shipping**

The major commercial shipping routes through the Timor Sea pass well to the north and south of the permit areas. Vessels utilising these routes include bauxite carriers servicing terminals at Gove (Northern Territory) and Weipa (Cape York Peninsula), and coal carriers and container vessels departing Queensland ports for destinations in the Middle East, Europe and South Africa (LeProvost Dames & Moore 1997).

Vessel movements routinely operating in waters of the JPDA to the south of Contract Area C include those servicing the Challis/Jabiru, Corallina/Laminaria oilfields and Bayu Undan gas field.

### 3.3.5 Fisheries

#### Commercial Fishing

The Government of Timor-Leste issued four commercial fishing licences for the Timor Sea in 2006. These were operated in 2007, but the Direcção Nacional de Pescas e Aquicultura (DNPA) (National Directorate of Fisheries & Aquaculture) have advised that these were not operated in 2008. Illegal fishing is also known to occur in the waters south of Timor-Leste.

#### Traditional and Subsistence Fisheries

Coastal communities along the 600km of Timor-Leste's coastline rely on a wide range of fish, including the large tunas, flying fish, coral reef fish and deepwater snappers for their livelihoods. The DNPA estimates that for over half the 20,000 fishermen of Timor-Leste, fishing is the main source of food and income. United Nations (UN) support since 1999 has helped re-establish the nation's fishing capacity, with the fish catch estimated to be 1,600 tonne in 2002 (Jasarevic, 2002).

The main vessel for traditional fishing is the pirogue, a small, flat-bottomed boat often propelled by paddles, although outboard motors are becoming increasingly common. Traditional fishing uses both gill net and handlines, and fishing activities usually do not extend more than 2 nautical miles (<4km) from the coast.

#### Recreational Fishing

The project is located in a very remote area and the deep waters and flat bottom of the project area are unlikely to be of interest to recreational fishing. No known tourist or recreational fishing occurs in the area. Apart from the possibility of occasional passing private motor vessels or yachts, there are no known tourism interests in the area.

### 3.3.6 Shipwrecks and Heritage Sites

There are no known significant marine heritage or archaeological sites in the vicinity of the proposed Cova-1 well.



## 4. ENVIRONMENTAL RISK ASSESSMENT

### 4.1 INTRODUCTION

This chapter describes the potential environmental impacts associated with the drilling of the Cova-1 exploration well. Section 4.2 describes Eni's risk assessment methodology. Sections 4.3 and 4.4 presents risk registers for routine activities and non-routine incidents respectively.

### 4.2 ENVIRONMENTAL RISK ASSESSMENT METHODOLOGY

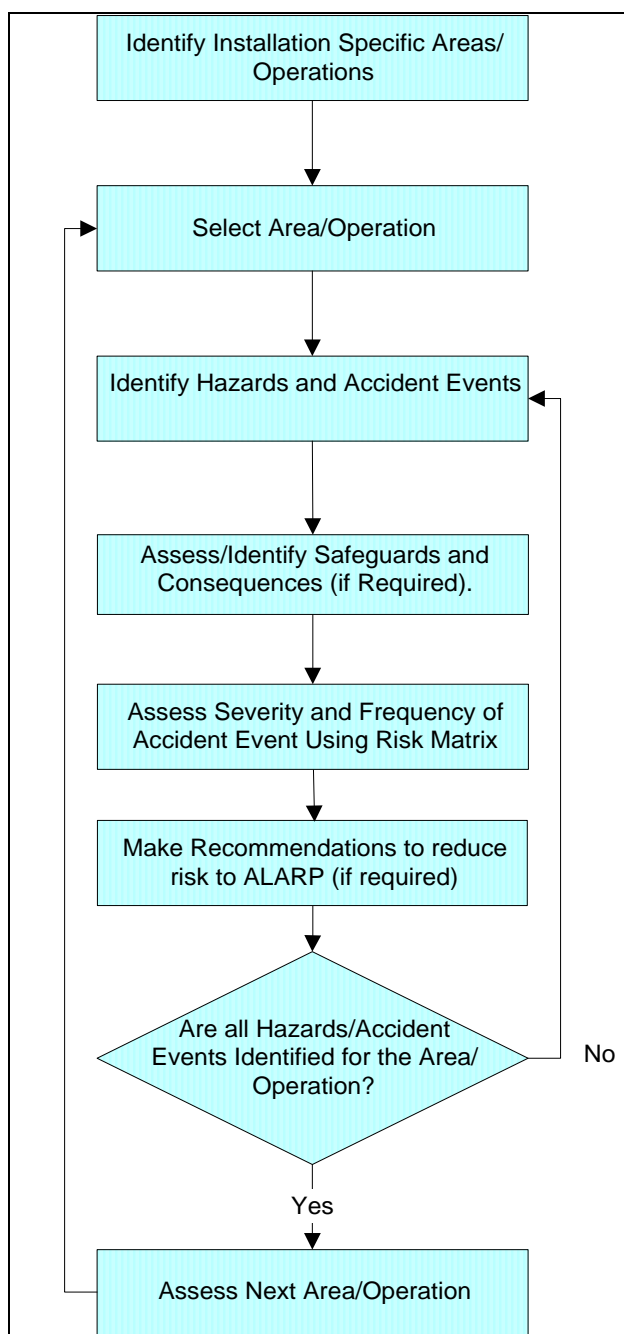
Eni's philosophy to managing environmental risks is to remove or mitigate the risk during the design phase. Managing risks through design is contingent upon identifying, at an early stage in the project, the sources and pathways by which environmental impacts can occur and the sensitivities of the receiving environment in which the project is situated.

Eni's risk assessment procedure was implemented in order to assess the expected or potential impacts associated with the drilling of Cova-1. Eni's risk assessment methodology provides a systematic process for:

1. identifying each project activity and its associated environmental aspects;
2. identifying the environmental values/attributes at risk within and adjacent to the area;
3. defining the potential environmental effects of aspects identified in Step 1 on those values/attributes at risk identified in Step 2 above;
4. identifying the likelihood of occurrence;
5. identifying the consequences of potential environmental aspects; and
6. evaluating overall environmental risk levels using a likelihood and consequence matrix.

Figure 4.1 provides a generic representation of Eni's risk assessment methodology. Table 4.1 presents Eni's risk matrix showing likelihood, consequence and risk ranking classifications and Table 4.2 presents the environmental consequence descriptors.

A high-level risk assessment workshop was conducted in March 2010 based Eni's knowledge and understanding of risks and impacts gained through its previous drilling in the Timor Sea. The outcomes of the risk assessment are presented in Section 4.3 (Table 4.3) for routine activities and associated emissions and discharges, and in Section 4.4 (Table 4.4) for non-routine incidents such as oil and chemical spills.



**Figure 4.1: Risk Assessment Methodology**

Table 4.1: Eni Risk Matrix

Consequence									Increasing Annual Frequency/Likelihood					
Severity	Reputation		Labour	Community	Health & Safety		Environment	Assets/Activities	0	A	B	C	D	E
	Stakeholder Relation	Company Image			Health	Safety			Practically non-credible occurrence	Rare occurrence	Unlikely occurrence	Credible occurrence	Probable occurrence	Likely/Frequent occurrence
									Could happen in E&P industry	Reported for E&P industry	Has occurred at least once in Company	Has occurred several times in Company	Happens several times/year in Company	Happens several times/year in one location
1	Slight impact	Slight impact	Slight impact	Slight impact	Slight impact	Slight impact	Slight impact	Slight impact	LOW					
2	Minor impact	Minor impact	Minor impact	Minor impact	Minor impact	Minor impact	Minor impact	Minor impact	MEDIUM					
3	Significant impact	Local impact	Medium impact	Local impact	Significant impact	Significant impact	Local impact	Local impact	HIGH					
4	Major impact	National impact	Major impact	Major impact	Major impact	Major impact	Major impact	Major impact	HIGH					
5	Extensive impact	International impact	Extensive impact	Extensive impact	Extensive impact	Extensive impact	Extensive impact	Extensive impact	HIGH					

Table 4.2: Environmental Consequence Descriptors

Descriptor	Description
<b>Slight Impact</b>	<p>Small discharges with confined and temporary impact on the area.</p> <p>No noticeable impact on water/air/soil and biodiversity.</p> <p>Negligible impact due to GHG emissions.</p> <p>Good materials/energy/water selection and use.</p> <p>Negligible financial consequences.</p>
<b>Minor Impact</b>	<p>Sufficiently large discharges to impact the environment but no long lasting effect.</p> <p>Short-term, localised impact on water/air/soil and biodiversity (on a limited no. of non-threatened species).</p> <p>&lt;1 week for clean up, 1-2 years for natural recovery.</p> <p>Slight impact due to GHG emissions.</p> <p>Adequate materials/energy/water selection and use.</p> <p>Single breach of statutory or prescribed limit or single complaint.</p>
<b>Local Impact</b>	<p>Limited discharges affecting the neighbourhood and damaging the environment with longer effects.</p> <p>Short term, more widespread impact on water/air/soil and biodiversity (on a higher no. of non-threatened species).</p> <p>&lt;1month for clean up, 2-5 years for natural recovery.</p> <p>Limited impact due to GHG emissions.</p> <p>Inadequate materials/energy/water selection and use.</p> <p>Repeated breaches of statutory or prescribed limit or many complaints.</p>
<b>Major Impact</b>	<p>Large discharges with severe and long lasting environmental damage.</p> <p>Medium-term, widespread impact on water/air/soil and biodiversity (on some threatened species and/or ecosystem function).</p> <p>1-5 months for clean up, 5-10 years for natural recovery.</p> <p>Extensive measures (financially significant) required to restore the impacted area.</p> <p>Significant impact due to GHG emissions.</p> <p>Poor materials/energy/water selection and use.</p> <p>Extended breaches of statutory or prescribed limits, or widespread nuisance.</p>
<b>Extensive Impact</b>	<p>Large discharges with severe and persistent environmental damage.</p> <p>Long-term, large-scale impact on water/air/soil and biodiversity (likely permanent species loss and impact on ecosystem function).</p> <p>&gt;5 months for clean up, &gt;10 years for natural recovery.</p> <p>Very poor materials/energy/water selection and use.</p> <p>Major financial consequences for the Company.</p> <p>Ongoing breaches well above statutory or prescribed limits.</p>

### 4.3 COVA-1 RISK REGISTER – ROUTINE ACTIVITIES

Table 4.3: Cova-1 Drilling: Potential Environmental and Social Risks and their Safeguards

Source of Risk	Potential Environmental Effects/ Incidents	Description	Inherent Risk			Controls in Place	Residual Risk			Management Strategy
			Freq.	Conse-quence	Risk		Freq.	Conse-quence	Risk	
Physical Disturbances to Marine Fauna										
Noise/ vibration caused by drilling	Disturbance to cetaceans, turtles, seabirds and fish	<ul style="list-style-type: none"><li>The Cova-1 well is not in a known feeding, breeding or aggregation areas for marine fauna.</li><li>Expected noise levels are below the level of noise that may cause interference to cetaceans of 150db (McCauley, 1998).</li><li>The dominant frequencies of drilling are below the hearing range of turtles (100Hz–700Hz).</li><li>An ‘alarm’ response is displayed by turtles approximately 2km from a seismic survey source (McCauley <i>et al</i>, 2000). The noise intensity of drilling is far less, so the range of disturbance would be decreased.</li><li>Cetaceans may demonstrate avoidance behaviour from 2km–8km away.</li><li>Drilling noise frequencies and intensities (McCauley, 1998) are not in the most sensitive range for cetaceans or turtles.</li><li>The relatively constant noise source of drilling is less likely to traumatise fauna than erratic sources.</li></ul>	B	2	Low	<ul style="list-style-type: none"><li>Cetacean interaction standards followed.</li><li>Induction of all personnel to include the requirement to report cetacean sightings.</li><li>Ensure that crew are aware about the possibility of disturbing marine fauna and that drilling start-up procedures are followed.</li><li>Observations for marine mammals prior to wireline seismic activity and implementation of soft-start procedures.</li></ul>	B	2	Low	5.7



Source of Risk	Potential Environmental Effects/ Incidents	Description	Inherent Risk			Controls in Place	Residual Risk			Management Strategy
			Freq.	Consequence	Risk		Freq.	Consequence	Risk	
Noise caused by support and supply vessels	Disturbance to cetaceans, turtles and fish	<ul style="list-style-type: none"> <li>The proposed Cova-1 well is not in a known feeding, breeding or aggregation areas for marine fauna.</li> <li>Noise levels are loudest when the supply vessels are positioning the rig. This is of a short duration relative to drilling.</li> <li>Supply vessels are under low propulsion power when in close proximity to the rig.</li> </ul>	B	2	Low	<ul style="list-style-type: none"> <li>Nil identified</li> </ul>	B	2	Low	5.7
Noise caused by support aircraft	Disturbance to roosting seabirds and marine fauna	<ul style="list-style-type: none"> <li>Estimated to be three or four flights to the drillship from Dili per week.</li> </ul>	B	2	Low	<ul style="list-style-type: none"> <li>Compliance with Australian National Guidelines for Whales &amp; Dolphins Watching 2005 as it refers helicopters, i.e.: <ul style="list-style-type: none"> <li>no flying lower than 500m within a 500m radius of a whale or dolphin;</li> <li>no hovering over the no-fly zone;</li> <li>avoiding approaching a whale or dolphin from head-on;</li> <li>avoiding flying directly over, or passing the shadow of the helicopter directly over a whale or dolphin; and</li> <li>cease the activity if the whale or dolphin shows signs of disturbance.</li> </ul> </li> </ul>	A	2	Low	5.7





Source of Risk	Potential Environmental Effects/ Incidents	Description	Inherent Risk			Controls in Place	Residual Risk			Management Strategy
			Freq.	Consequence	Risk		Freq.	Consequence	Risk	
Light from rig	Disturbance to turtles and seabirds	<ul style="list-style-type: none"> <li>The proposed Cova-1 well is not in a known feeding, breeding or aggregation areas for marine fauna.</li> <li>Lighting may result in a short term abundance of certain species attracted by the light. Drilling will last in the order of 30 to 35 days and this period of time will not cause irreversible fauna behaviour.</li> </ul>	B	2	Low	<ul style="list-style-type: none"> <li>Preferential use of fluorescent lights that meet required safety standards.</li> </ul>	B	2	Low	5.7
Hull fouling	Introduction of marine pests to Timor Leste or Australian waters	<ul style="list-style-type: none"> <li>Drillship will transit from international waters direct to Cova-1 well site. Water depth is 2000m therefore not conducive to supporting non-indigenous marine species (NIMS).</li> <li>Supply/support vessels will transit from Australian waters to Cova-1 well site. Only possible introduction of NIMS is into Australian waters.</li> <li>Supply/support vessels on site and in contact with drillship for less than 24hrs so opportunity for translocation of NIMS to supply/support vessels is minimal.</li> </ul>	A	3	Low	<ul style="list-style-type: none"> <li>Eni shall vet each vessel prior to its mobilisation from international waters including conducting a risk assessment to determine the risk the vessel poses in introducing NIMS from biofouling.</li> <li>Each vessel should have Antifouling Certification or maintain a Biofouling Record Book detailing the management actions implemented to minimise the risk of introducing or spreading NIMS via biofouling.</li> </ul>	A	3	Low	5.5



Source of Risk	Potential Environmental Effects/ Incidents	Description	Inherent Risk			Controls in Place	Residual Risk			Management Strategy
			Freq.	Conse-quence	Risk		Freq.	Conse-quence	Risk	
Waste Discharges										
Drilling fluids	Disturbance to marine environment Adverse effects on water quality	<ul style="list-style-type: none"><li>Drilling fluid adheres to drill cuttings and is consequently disposed of overboard with the cuttings.</li><li>High dilution rates – dilutions of &gt;1:100 within 20m of the discharge are predicted during all sea conditions (Swan <i>et al</i>, 1994).</li><li>Open oceanic environment remote from sensitive marine resources.</li><li>Low toxicity water based drilling fluids will be used.</li></ul>	E	1	Low	<ul style="list-style-type: none"><li>Drilling fluids are reviewed and selected based on technical suitability and by having a minimum overall effect on environment (including ecotoxicity and dosing requirement characteristics).</li><li>Use of drilling chemicals will be minimised as far as is practicable.</li><li>Drill floor drainage system catches any spills and reports to oil in water separator.</li><li>The amount of drilling fluids disposed of with cuttings is minimised by the cuttings shakers equipment aboard the rig.</li></ul>	E	1	Low	5.2
Drill Cuttings	Increased turbidity in the water column Disturbance to benthic marine fauna	<ul style="list-style-type: none"><li>Turbidity in the water column during drilling is caused by the fine cuttings and drilling muds remaining suspended in the water.</li><li>The proposed Cova-1 well is not in a known feeding, breeding or aggregation areas for marine fauna.</li></ul>	E	1	Low	<ul style="list-style-type: none"><li>Drilling riser-less decreases turbid plume as the cuttings are discharged at the seabed and therefore there is little opportunity for dispersal.</li></ul>	E	1	Low	5.2



Source of Risk	Potential Environmental Effects/ Incidents	Description	Inherent Risk			Controls in Place	Residual Risk			Management Strategy
			Freq.	Consequence	Risk		Freq.	Consequence	Risk	
Drill Cuttings	Smothering of benthic organisms	<ul style="list-style-type: none"> <li>Modelling (Sustainability 2010) has shown that the majority of cuttings would settle on the seabed within 700m of the well at a low average concentration of 0.24kg/m<sup>2</sup> – 1kg/m<sup>2</sup> and an average thickness of &lt;1mm.</li> <li>There are no sensitive benthic habitats in the immediate vicinity of the proposed Cova-1 well.</li> </ul>	E	1	Low	<ul style="list-style-type: none"> <li>Undertake a post-drilling ROV survey to confirm the fate of riser-less drill cuttings on the seabed.</li> </ul>	E	1	Low	5.7
Deck drainage	Disturbance to marine environment Adverse effects on water quality	<ul style="list-style-type: none"> <li>Low concentration of contaminants when combined with wash down water.</li> <li>Low volumes of overboard discharges involved.</li> <li>Deck areas occasionally washed down with biodegradable industrial detergent such as 'Rigwash' to avoid build up of oily contaminants.</li> </ul>	E	1	Low	<ul style="list-style-type: none"> <li>Drainage system on drill floor reports to slops tank.</li> <li>Absorbents and containers will be available on the rig to clean up small accumulations of oil and grease around work areas and deck s.</li> <li>Process bunding has many times the capacity of the chemical tank volume with the facility to overflow to a main skid bund.</li> <li>Oily water from drillship machinery space bilges captured and directed to a sludge tank, which in turn drains into a slops tank before transport to the mainland for disposal at approved facilities.</li> </ul>	D	1	Low	5.2
Laboratory wastes	Disturbance to marine environment Adverse effects on water quality	<ul style="list-style-type: none"> <li>Laboratory wastes generated during oil testing.</li> </ul>	B	2	Low	<ul style="list-style-type: none"> <li>Oil soluble chemicals will be disposed to the drillship oil storage holds prior to transport to the mainland for disposal.</li> <li>Laboratory chemical volumes minimal and consequently disposed directly overboard.</li> </ul>	A	2	Low	5.2



Source of Risk	Potential Environmental Effects/ Incidents	Description	Inherent Risk			Controls in Place	Residual Risk			Management Strategy
			Freq.	Consequence	Risk		Freq.	Consequence	Risk	
Cooling water	Disturbance to marine environment Adverse effects on water quality	<ul style="list-style-type: none"> <li>Approximately 800L/minute.</li> <li>The cooling water system is a segregated system, therefore not in contact with hydrocarbons nor are chemicals added to the water.</li> <li>High dilution rates due to the open ocean conditions would mean that no change in salinity would be detectable outside a localised area.</li> </ul>	E	1	Low	<ul style="list-style-type: none"> <li>The cooling water discharge point is above sea level allowing for cooling and oxygenation as it falls.</li> </ul>	E	1	Low	5.2
Reject (brine) water	Disturbance to marine environment Adverse effects on water quality	<ul style="list-style-type: none"> <li>Approximately 30m<sup>3</sup> per day of water produced from reverse osmosis.</li> <li>Small volumes discharged and high dilution rates due to the open ocean conditions would mean that no change in salinity would be detectable outside a localised area.</li> </ul>	E	1	Low	<ul style="list-style-type: none"> <li>Nil identified.</li> </ul>	E	1	Low	5.2
Cement	Disposal of excess cement Smothering of benthic organisms	<ul style="list-style-type: none"> <li>A maximum of 60m<sup>3</sup> of cement will be present on the seabed.</li> </ul>	E	1	Low	<ul style="list-style-type: none"> <li>Minimise the volume discharged.</li> <li>Cement and associated chemicals are reviewed and selected based on technical suitability and by having a minimum overall effect on environment.</li> </ul>	E	1	Low	5.2



Source of Risk	Potential Environmental Effects/ Incidents	Description	Inherent Risk			Controls in Place	Residual Risk			Management Strategy
			Freq.	Consequence	Risk		Freq.	Consequence	Risk	
Waste oil and chemicals	Disturbance to marine environment Adverse effects on water quality	<ul style="list-style-type: none"> <li>Waste oil and chemicals will be stored onboard the drillship and transferred to the mainland for disposal.</li> </ul>	B	1	Low	<ul style="list-style-type: none"> <li>Wastes stored onboard in appropriate containers.</li> <li>Handling of all hazardous wastes must be conducted in line drillship procedures.</li> <li>All hazardous waste material will be disposed of appropriately onshore.</li> <li>Hazardous wastes will be labelled and transferred, in accordance with Material Safety Data Sheet (MSDS) instructions.</li> <li>Induction of all personnel includes information on waste management procedures.</li> </ul>	A	1	Low	5.3
Sewage, grey water and putrescibles wastes	Disturbance to marine resources, adverse effects on water quality Nutrient enrichment and biostimulation of the water column surrounding the drillship	<ul style="list-style-type: none"> <li>Maximum 173 people onboard.</li> <li>The estimated volume of sewage water produced is 60L/person/day. The small volumes of sewage water discharged ensure that only a localised area would be affected by the waste discharge.</li> <li>The estimated volume of grey water produced is 140L/person/day. The small volumes of grey water discharged ensure that only a localised area would be affected by domestic waste discharge.</li> <li>The grey water is comprised of potable water, soap and detergents so none of the identified components of grey water are inherently toxic.</li> </ul>	E	1	Low	<ul style="list-style-type: none"> <li>All sewage to be treated and discharged in accordance with MARPOL Annex IV (Regulation 11).</li> <li>All food scraps and putrescible wastes to be comminuted to &lt;25mm and discharged in accordance with MARPOL Annex V (Regulation 3).</li> </ul>	E	1	Low	5.2



Source of Risk	Potential Environmental Effects/ Incidents	Description	Inherent Risk			Controls in Place	Residual Risk			Management Strategy
			Freq.	Consequence	Risk		Freq.	Consequence	Risk	
		<ul style="list-style-type: none"> <li>There are no sensitive habitats in the immediate vicinity of any of the Cova-1 well.</li> </ul>								
Ballast Water	Displacement of endemic species with introduced pests	<ul style="list-style-type: none"> <li>The Cova-1 well is located in an open ocean and the environment does not provide a habitat for ballast water organisms to colonise.</li> </ul>	B	1	Low	<ul style="list-style-type: none"> <li>Ballast water from a foreign port will not be discharged into Timor Leste or Australian waters less than 200m deep.</li> </ul>	A	1	Low	5.5
Disposal of BOP fluids	Disturbance to marine resources, adverse effects on water quality	<ul style="list-style-type: none"> <li>Type of fluid: Eriofon HD 603 (McDermid)</li> <li>Estimated 18 L/day discharged to sea during function tests.</li> </ul>	E	2	Low	<ul style="list-style-type: none"> <li>BOP fluids are reviewed and selected based on technical suitability and by having a minimum overall effect on environment.</li> </ul>	E	2	Low	5.2
<b>Solid and Hazardous Waste</b>										
General rubbish	Disturbance to marine resources, adverse effects on water quality	<ul style="list-style-type: none"> <li>Domestic and industrial solid wastes collected and segregated on the drillship.</li> </ul>	B	1	Low	<ul style="list-style-type: none"> <li>All waste material will be returned to the Australian mainland for appropriate onshore disposal.</li> <li>Induction of all personnel.</li> <li>Good housekeeping practices, including segregation of wastes.</li> <li>Tracking of waste i.e. monitoring of volumes and types.</li> </ul>	B	1	Low	5.7
Hazardous wastes	Disturbance to marine resources, adverse effects on water quality	<ul style="list-style-type: none"> <li>Hazardous solid and liquid wastes, collected and segregated on the drillship.</li> </ul>	B	1	Low	<ul style="list-style-type: none"> <li>Wastes stored onboard in appropriate containers.</li> <li>Hazardous wastes will be labelled and transferred to the mainland, in accordance with the MSDS instructions.</li> <li>Tracking of waste, i.e. monitoring of volumes and types.</li> </ul>	B	1	Low	5.7





Source of Risk	Potential Environmental Effects/ Incidents	Description	Inherent Risk			Controls in Place	Residual Risk			Management Strategy
			Freq.	Conse-quence	Risk		Freq.	Conse-quence	Risk	
Atmospheric Emissions										
Power generation	Localised effect on air quality  Global contribution to greenhouse gases	<ul style="list-style-type: none"><li>Drillship uses approximately 30m³ per day of diesel.</li><li>The supply/support vessel uses approximately 10m³ per day.</li></ul>	E	1	Low	<ul style="list-style-type: none"><li>Vessel surveyed and issued with International Air Pollution Prevention Certificate</li><li>Drillship planned maintenance program in place.</li><li>Equipment will be maintained to manufacturer's specifications.</li><li>Engine output is adjusted to maintain station under prevailing environmental conditions.</li><li>Selection of low sulphur diesel in line with MARPOL requirements to minimise SOx emissions.</li></ul>	E	1	Low	5.4
Flared hydrocarbons	Localised effect on air quality  Global contribution to greenhouse gases	<ul style="list-style-type: none"><li>No intention to flare hydrocarbons unless encountered during drilling.</li></ul>	E	1	Low	<ul style="list-style-type: none"><li>The volume of gas flared (if encountered during drilling) will be minimised by Eni's well control measures</li><li>Oil, if encountered, would not be flared,</li></ul>	E	1	Low	5.4
Ozone depleting substances (ODS)	Localised effect on air quality	<ul style="list-style-type: none"><li>The following ODSs used in AC systems and freeze rooms - HFC R407c, HFC 134a and HCFC R22. These are closed systems and do not vent to atmosphere. For maintenance a vacuum pump used to recover the gas into the circuit.</li><li>ODS (halon) will also be present on helicopters. In the event of an emergency a small volume of halon would be released.</li></ul>	C	1	Low	<ul style="list-style-type: none"><li>An ODS inventory shall be maintained and reviewed to ensure compliance with MARPOL Annex VI (Regulation 12)</li><li>There will be no discharge of ODS except in the case of a helicopter emergency.</li><li>Any release of ODS will be reported as an environmental incident and investigated.</li></ul>	C	1	Low	5.4



Source of Risk	Potential Environmental Effects/ Incidents	Description	Inherent Risk			Controls in Place	Residual Risk			Management Strategy
			Freq.	Conse-quence	Risk		Freq.	Conse-quence	Risk	
Physical Presence leading to Social Disturbances										
Interference with commercial/ traditional fishing	Disruption to fishing vessels	<ul style="list-style-type: none"><li>No commercial fisheries or traditional fishing activities occur in the vicinity of Cova-1.</li></ul>	A	2	Low	<ul style="list-style-type: none"><li>A temporary exclusion zone will apply around the drillship.</li><li>Navigation lighting and permanent watch aboard the rig and support vessels.</li><li>Watch is kept at all times.</li></ul>	A	1	Low	N/A
Interference with shipping	Disruption to shipping routes	<ul style="list-style-type: none"><li>No major shipping lanes in vicinity of Cova-1.</li></ul>	B	2	Low	<ul style="list-style-type: none"><li>Notification to DNMA, ANP and AMSA and establishment of 500m exclusion zone around drillship.</li><li>Navigation lighting and permanent watch aboard the rig and support vessels.</li></ul>	B	2	Low	N/A
Interference with recreational vessels	Disruption to recreational users	<ul style="list-style-type: none"><li>No recreational vessels utilise this area.</li></ul>	A	1	Low	<ul style="list-style-type: none"><li>Nil required.</li></ul>	A	1	Low	N/A
Interference with culturally or historically significant sites	Disruption to significant sites	<ul style="list-style-type: none"><li>No known or suspected culturally or historically significant sites occur in this area.</li></ul>	A	1	Low	<ul style="list-style-type: none"><li>Nil required.</li></ul>	A	1	Low	N/A
Interference with amenity, National Parks or Conservation Reserves	Disruption to conservation values of National Parks or Conservation Reserves	<ul style="list-style-type: none"><li>No national parks ,Ramsar listed areas, conservation reserves or marine protected areas occur near the Cova-1 well.</li></ul>	A	1	Low	<ul style="list-style-type: none"><li>Nil required.</li></ul>	A	1	Low	N/A

**Table 4.4: Cova-1 Risk Register – Oil, fuel and chemical spills: potential environmental risks and their safeguards**

Release Event	Cause	Maximum Spill Size (m <sup>3</sup> )	Safeguards	Likelihood	Consequence	Residual Risk	Management Strategy
Loss of well control and blow-out	Well integrity failure Errant vessel collision Well head damage in severe weather	9,000	<ul style="list-style-type: none"> <li>Develop a bridging document for well control procedures to clarify Eni and Saipem responsibilities, with respect to: <ul style="list-style-type: none"> <li>testing the BOP prior to commencement of operations and regularly during operations;</li> <li>pressure testing casing strings;</li> <li>continuously monitoring for abnormal pressure parameters during drilling;</li> <li>ensuring the drill crew is fully trained in emergency well control and OSCP procedures;</li> </ul> </li> <li>BOP and hydrocarbon detection systems in place.</li> <li>Overbalanced drilling.</li> <li>Flare and oil storage facilities in the event of an influx of hydrocarbons during drilling.</li> <li>Normal pressure gradients anticipated based on study using nearby well data.</li> <li>Notification to DNMA, ANP and AMSA and establishment of 500m exclusion zone around drillship.</li> </ul>	A	4	Medium	5.3
Leak from fittings and connections	Equipment failure	Negligible	<ul style="list-style-type: none"> <li>Pressure tested equipment.</li> <li>Planned maintenance programme.</li> </ul>	B	1	Low	5.3
Refuelling incident	Localised and temporary acute and chronic toxic effects to sensitive resources Adverse effects on water quality	5	<ul style="list-style-type: none"> <li>Refuelling will be carried out under the Saipem Permit-To-Work system.</li> <li>Refuelling will be undertaken only during periods of calm weather and preferably in daylight hours.</li> <li>Transfer hoses will be fitted with 'dry break' couplings.</li> <li>Refuelling operations will be overseen by the vessel's Master or First Officer.</li> </ul>	C	2	Medium	5.3



Release Event	Cause	Maximum Spill Size (m <sup>3</sup> )	Safeguards	Likelihood	Consequence	Residual Risk	Management Strategy
Vessel collision	Localised and temporary acute and chronic toxic effects to marine resources Adverse effects on water quality	80	<ul style="list-style-type: none"> <li>Hydrocarbons i.e. diesel likely to have high evaporation and dispersion rates.</li> <li>Nearest shorelines are located over 80 km to the north, so any spill would be unlikely to reach shorelines.</li> <li>Eni Emergency Management Plan and PSC-S06-03 OSCP.</li> <li>Oil spill response equipment on board drillship and available through AMOSC.</li> <li>Notification to DNMA, ANP and AMSA and establishment of 500m exclusion zone around drillship.</li> <li>Automatic Radar Plotting Aids (ARPA).</li> </ul>	A	3	Low	5.3
Leaks of hydraulic fluids	Localised and temporary acute and chronic toxic effects to marine resources Adverse effects on water quality	0.05	<ul style="list-style-type: none"> <li>Preventative maintenance.</li> <li>Low toxicity hydraulic fluids used.</li> <li>Manned operation (visual detection of release).</li> <li>Drip pans/bunds.</li> </ul>	D	1	Low	5.3
Chemical spills	Spills during transfers e.g. dropped bulk bin Spills during storage and handling	1	<ul style="list-style-type: none"> <li>Transfers will be carried out under the Saipem Permit-To-Work system.</li> <li>Transfers will be undertaken only during periods of calm weather and preferably in daylight hours.</li> <li>Transfer operations will be overseen by the vessel's Master or First Officer.</li> </ul>	B	3	Medium	5.3

## 5. ENVIRONMENTAL MANAGEMENT STRATEGIES

### 5.1 OVERVIEW

This section of the EMP outlines the Environmental Management Strategies (EMS) in place to manage the potential impacts on the environment from the drilling of the Cova-1 well and to ensure compliance with all relevant regulations.

The environmental objectives defined in the EMSs are based on the identified environmental hazardous events, associated environmental effects and the assessed risks, corporate policies and performance commitments and applicable legal requirements. For the purposes of developing the EMSs for the drilling operations, environmental objectives, targets and key performance indicators (KPI's) are defined as follows:

<b>Objective</b>	Overall performance goal that, when achieved, ensures legal compliance and fulfilment of corporate performance commitments and standards.
<b>Target</b>	Specific, measurable performance goal against which actual performance can be measured.
<b>KPI</b>	Criterion used to measure performance against a reference target.

EMSs have been developed for 6 environmental hazards, as follows, and are presented in Sections 5.2 to 5.7 below:

- 5.2 Marine Discharges Management Strategy.
- 5.3 Hydrocarbon and Chemical Spill Management Strategy.
- 5.4 Atmospheric Emissions Management Strategy.
- 5.5 Marine Pests Management Strategy.
- 5.6 Marine Waste Management Strategy.
- 5.7 Marine Fauna Management Strategy.

## 5.2 MARINE DISCHARGES MANAGEMENT STRATEGY

MARINE DISCHARGES MANAGEMENT STRATEGY
Applicable Activities
<ul style="list-style-type: none"> <li>• Drilling fluids and drill cuttings.</li> <li>• Deck drainage.</li> <li>• Laboratory wastes.</li> <li>• Cooling water.</li> <li>• Reject (brine) water.</li> <li>• Sewage, grey water and putrescible wastes.</li> <li>• Cement.</li> <li>• Disposal of BOP fluids.</li> <li>• Ballast water.</li> </ul>
Potential Environmental Effects
<ul style="list-style-type: none"> <li>• Increased turbidity in the water column.</li> <li>• Localised smothering of benthic fauna from drill cuttings.</li> <li>• Toxic effects of hydrocarbons and chemicals on marine biota or changes in habitat characteristics.</li> <li>• Physical coating or asphyxiation, or disruption of physiological or behavioural processes in marine biota by hydrocarbons.</li> <li>• Localised increases in environmental nutrient loading.</li> <li>• Localised reduction in water quality (e.g. including reduced dissolved oxygen and an increase in water temperature and salinity).</li> </ul>
Corporate Commitments
<ul style="list-style-type: none"> <li>• Set objectives and targets, implemented through appropriate programmes, thus ensuring the continual improvement in overall HSE performance.</li> <li>• Comply with relevant legislation and other requirements to which Eni Timor Leste subscribes or apply company standards where relevant laws and regulations do not exist.</li> <li>• Maintain a documented HSE Integrated Management System certified to ISO14001 which enables comprehensive reporting and review of performance.</li> <li>• Prevent pollution and minimise greenhouse gas emissions, effluents, discharges and other impacts on the environment while safeguarding our resources.</li> </ul>
Regulatory Requirements
<ul style="list-style-type: none"> <li>• MARPOL ANNEX I: Prevention of pollution by oil.</li> <li>• MARPOL ANNEX IV: Prevention of pollution by sewage from ships.</li> <li>• MARPOL ANNEX V: Prevention of pollution by garbage from ships.</li> <li>• APPEA Code of Practice 2008.</li> </ul>



MARINE DISCHARGES MANAGEMENT STRATEGY		
Performance Objectives	Targets	Key Performance Indicators
<ul style="list-style-type: none"> <li>Water Based muds to be used for drilling</li> </ul>	<ul style="list-style-type: none"> <li>Exclusive use of WBMs for drilling</li> </ul>	<ul style="list-style-type: none"> <li>Records show that only WBM used for drilling</li> </ul>
<ul style="list-style-type: none"> <li>Planned discharges to comply with MARPOL regulatory limits for hydrocarbons discharges to sea</li> </ul>	<ul style="list-style-type: none"> <li>Zero discharges of hydrocarbons at concentrations above the MARPOL Annex I (Regulation 15) limit of 15 mg/L hydrocarbons</li> </ul>	<ul style="list-style-type: none"> <li>Number of non-conforming discharges (exceeding 15mg/L oil-in-water)</li> </ul>
<ul style="list-style-type: none"> <li>Sewage discharges to comply with MARPOL Annexes IV</li> </ul>	<ul style="list-style-type: none"> <li>All sewage to be treated and discharged in accordance with MARPOL Annex IV (Regulation 11)</li> </ul>	<ul style="list-style-type: none"> <li>Number of non-conforming discharges (non-compliance with MARPOL Annex IV (Regulation 11))</li> </ul>
<ul style="list-style-type: none"> <li>Discharge of food scraps and putrescible wastes to comply with MARPOL Annex V</li> </ul>	<ul style="list-style-type: none"> <li>All food scraps and putrescible wastes to be comminuted to &lt;25mm and discharged in accordance with MARPOL Annex V (Regulation 3)</li> </ul>	<ul style="list-style-type: none"> <li>Number of non-conforming discharges (non-compliance with MARPOL Annex V (Regulation 3))</li> </ul>
Management Strategies		
<ul style="list-style-type: none"> <li>Drilling fluids, cement and other chemicals have been assessed and selected based on technical suitability and environmental credentials.</li> <li>Project induction will emphasise the importance of preventing spills of hydrocarbons and chemicals.</li> <li>Daily house-keeping inspections shall be conducted to ensure that decks are kept clean.</li> <li>Onboard Spill Response Kits will be maintained on all vessels in strategic locations.</li> <li>Oil soluble chemicals will be disposed to the drillship oil storage holds prior to transport to the mainland for disposal.</li> </ul>		
Engineering (As-built) Controls		
<ul style="list-style-type: none"> <li>Cutting shakers onboard the drillship will minimise the amount of drilling fluids disposed of with the drill cuttings.</li> <li>Deck drainage will be drained to oily water tanks and treated by approved separators. Separated oil will be pumped to holding tanks to be transferred to shore, while clean water will be tested prior to discharge overboard.</li> <li>Drill floor drainage system catches any spills and reports to oil-in-water separator.</li> <li>Oil soluble chemicals will be disposed to the drillship oil storage holds prior to transport to the mainland for disposal.</li> <li>Sewage effluent will be treated in an extended aeration system and comminuted to pass through a screen of less than 25mm diameter prior to discharge.</li> <li>Putrescible wastes will be comminuted to pass through a screen of less than 25mm diameter prior to discharge.</li> <li>The cooling water discharge point is above sea level allowing for cooling and oxygenation as it falls.</li> </ul>		

**MARINE DISCHARGES MANAGEMENT STRATEGY****Operations Procedural Controls**

- *Saipem 10000 Operations Manual*
- *Eni Australia (2008). HSE Standard Environmental Considerations for Chemical Use. ENI-HSE-ST-024*
- *Eni Australia (2008). HSE Standard Drilling Fluids and Cuttings. ENI-HSE-ST-026*

**Environmental Performance Monitoring and Reporting Requirements**

- Operational monitoring of emissions and discharges (refer to Section 6.6.1)
- Incidents will be reported to DNMA, as soon as practicable, but within, 48 hours. A written report will then be submitted within three days using the Incident Report Form in Eni's procedure: *Hazard and Incident Reporting and Investigation*.
- MARPOL 73/78 oil pollution incidents in Commonwealth of Australia waters will be reported to Eni and AMSA (via Australian Search and Rescue, AusSar) under Marine Notice 9/2004.

### 5.3 HYDROCARBON AND CHEMICAL SPILL MANAGEMENT STRATEGY

HYDROCARBON AND CHEMICAL SPILL MANAGEMENT STRATEGY		
Applicable Activities		
<ul style="list-style-type: none"> <li>Well integrity failure (blowout).</li> <li>Rupture/ leakage from vessel fuel tanks (eg collision scenario).</li> <li>Well-head damage in severe weather.</li> <li>Leak of hydraulic fluids.</li> <li>Refuelling incident.</li> <li>Bulk chemical transfers.</li> <li>Leakage of bulk process chemical containers.</li> </ul>		
Potential Environmental Effects		
<ul style="list-style-type: none"> <li>Acute and chronic toxic effects of hydrocarbons and chemicals on marine biota or changes in habitat characteristics.</li> <li>Physical coating or asphyxiation, or disruption of physiological or behavioural processes in marine biota by hydrocarbons.</li> </ul>		
Corporate Commitments		
<ul style="list-style-type: none"> <li>Set objectives and targets, implemented through appropriate programmes, thus ensuring the continual improvement in overall HSE performance.</li> <li>Comply with relevant legislation and other requirements to which Eni Timor Leste subscribes or apply company standards where relevant laws and regulations do not exist.</li> <li>Maintain a documented HSE Integrated Management System certified to ISO14001 which enables comprehensive reporting and review of performance.</li> <li>Prevent pollution and minimise greenhouse gas emissions, effluents, discharges and other impacts on the environment while safeguarding our resources.</li> </ul>		
Regulatory Requirements		
<ul style="list-style-type: none"> <li>MARPOL ANNEX I: Prevention of pollution by oil.</li> <li>APPEA Code of Environmental Practice 2008.</li> </ul>		
Performance Objectives	Targets	Key Performance Indicators
<ul style="list-style-type: none"> <li>To prevent oil spills</li> </ul>	<ul style="list-style-type: none"> <li>Zero incidents of spilled hydrocarbons</li> </ul>	<ul style="list-style-type: none"> <li>Number of spills</li> <li>Incident reports</li> </ul>
<ul style="list-style-type: none"> <li>To prevent chemical spills</li> </ul>	<ul style="list-style-type: none"> <li>Zero incidents of spilled chemicals</li> </ul>	<ul style="list-style-type: none"> <li>Number of spills</li> <li>Incident reports</li> </ul>

## HYDROCARBON AND CHEMICAL SPILL MANAGEMENT STRATEGY

### Management Strategies

- Project induction will emphasise the importance of preventing spills of hydrocarbons and chemicals.
- Continuously monitoring for abnormal reservoir pressure parameters during drilling.
- Overbalanced drilling and BOP in place.
- The drill crew shall be trained and competent in emergency well control and oil spill response procedures.
- Bridging document for well control procedures to clarify Eni and Saipem responsibilities.
- Refuelling and chemical transfers to shall be carried out under Saipem's Permit-To-Work system.
- Refuelling will be undertaken only during periods of calm weather and preferably in daylight hours.
- Refuelling and transfer operations overseen by the vessel's Master or First Officer.
- Chemical transport, handling, storage, use and disposal practices will comply with MSDSs.
- Notification to DNMA, ANP and AMSA and establishment of 500m exclusion zone around drillship.

### Engineering (As-built) Controls

- Blow Out Preventer tested prior to commencement of operations and regularly during operations.
- BOP and hydrocarbon detection systems in place.
- Flare and oil storage facilities in the event of an influx of hydrocarbons during drilling.
- Pressure tested equipment.
- Refuelling transfer hoses fitted with dry break couplings.
- Chemicals stored in dedicated bunded areas.
- Automated Radar Plotting Aids (ARPA).
- *Saipem 10000* preventative maintenance programme.

### Operations Procedural Controls

- *Saipem 10000 Operations Manual.*
- *Eni Timor Leste S.p.A ERP.*
- *Eni Timor Leste S.p.A PSC-S06-03 OSCP.*
- *Saipem 10000 SOPEP.*
- *Cova-1 Drilling bridging document for well control procedures.*
- *Eni Australia (2008). HSE Standard Hazardous Material Management. ENI-HSE-ST-009.*
- *Eni Australia (2008). HSE Standard Environmental Considerations for Chemical Use. ENI-HSE-ST-024.*

### Environmental Performance Monitoring and Reporting Requirements

- Operational monitoring of oil and chemical spill incidents (refer to Section 6.6.1)
- Incidents will be reported to DNMA, as soon as practicable, but within, 48 hours (see Section 0). A written report will then be submitted within three days using the Incident Report Form in Eni's procedure: Hazard and Incident Reporting and Investigation.
- MARPOL 73/78 oil pollution incidents in Commonwealth waters will be reported to Eni and AMSA (via Australian Search and Rescue, AusSar) under Marine Notice 9/2004.

## 5.4 ATMOSPHERIC EMISSIONS MANAGEMENT STRATEGY

ATMOSPHERIC EMISSIONS MANAGEMENT STRATEGY	
Applicable Activities/Events	
<p>Sources of emissions of GHG, NOx, SOx and ODS:</p> <ul style="list-style-type: none"> <li>• Power generation.</li> <li>• Vessel, aeroplane, helicopter and vehicle engines.</li> <li>• Flaring.</li> <li>• Refrigerants, Air Conditioning, Fire Suppression</li> </ul>	
Potential Environmental Effects	
<ul style="list-style-type: none"> <li>• Incremental increase in global atmospheric concentrations of GHG and resultant global warming.</li> <li>• Incremental increase in atmospheric NOx and SOx concentrations and resultant photochemical smog and acid rain.</li> <li>• Incremental increase in atmospheric ODS concentrations and damage to ozone layer.</li> </ul>	
Corporate Commitments	
<ul style="list-style-type: none"> <li>• Set objectives and targets, implemented through appropriate programmes, thus ensuring the continual improvement in overall HSE performance.</li> <li>• Comply with relevant legislation and other requirements to which Eni Timor Leste subscribes or apply company standards where relevant laws and regulations do not exist.</li> <li>• Maintain a documented HSE Integrated Management System certified to ISO14001 which enables comprehensive reporting and review of performance.</li> <li>• Prevent pollution and minimise greenhouse gas emissions, effluents, discharges and other impacts on the environment while safeguarding our resources.</li> </ul>	
Applicable Regulatory Requirements	
<ul style="list-style-type: none"> <li>• MARPOL ANNEX VI: Prevention of pollution by air pollution by ships.</li> <li>• APPEA Code of Environmental Practice 2008.</li> </ul>	

ATMOSPHERIC EMISSIONS MANAGEMENT STRATEGY		
Performance Objectives	Targets	Key Performance Indicators
<ul style="list-style-type: none"> <li>Minimise impacts of air emissions on the environment.</li> </ul>	<ul style="list-style-type: none"> <li>GHG, NOx and SOx emissions reduced to ALARP</li> </ul>	<ul style="list-style-type: none"> <li>Vessel International Air Pollution Prevention Certificate</li> <li>Estimated volumes of GHG NOx and SOx emitted</li> <li>Records show engines and equipment are serviced regularly and well maintained</li> <li>Records show engines comply with MARPOL Annex VI (Regulation 13)</li> <li>Records show sulphur content of diesel fuel used complies with MARPOL Annex VI (Regulation 14)</li> </ul>
<ul style="list-style-type: none"> <li>Avoid the release of ODS</li> </ul>	<ul style="list-style-type: none"> <li>No releases of ODS (with the exception of Halon in the fire fighting system if required in an emergency)</li> </ul>	<ul style="list-style-type: none"> <li>ODS inventory show that ODS onboard drillship complies with MARPOL Annex VI (Regulation 12)</li> <li>Records of non-compliance (incidents of ODS discharge)</li> </ul>
<ul style="list-style-type: none"> <li>Maintain records of all emissions</li> </ul>	<ul style="list-style-type: none"> <li>All emissions to be recorded</li> </ul>	<ul style="list-style-type: none"> <li>Records show that fuel usage and gas flaring reported</li> <li>Fuel invoices maintained on file</li> </ul>
Management Strategies		
<ul style="list-style-type: none"> <li>Minimise GHG emissions by ensuring equipment is correctly specified and maintained in accordance with a planned maintenance programme.</li> <li>Except in an emergency, the flaring of petroleum products shall not be carried out without approval from DNMA.</li> <li>Selection of low sulphur diesel in line with MARPOL requirements to minimise SOx emissions.</li> <li>Fuel efficient use of machinery and vehicles will be implemented where possible (eg switching engines off instead of idling).</li> <li>An ODS inventory shall be maintained and reviewed to ensure compliance with MARPOL Annex VI (Regulation 12).</li> </ul>		
Engineering (As-built) Controls		
<ul style="list-style-type: none"> <li>Vessel surveyed and issued with International Air Pollution Prevention Certificate</li> </ul>		
Operations Procedural Controls		
<ul style="list-style-type: none"> <li>Saipem 10000 Operations Manual</li> <li>Eni Australia (2008). HSE Standard Atmospheric Emissions. ENI-HSE-ST-027</li> <li>Procedure: HSE Data Monitoring and Reporting to Eni E&amp;P Division (Eni-HSE-PR-007)</li> </ul>		

**ATMOSPHERIC EMISSIONS MANAGEMENT STRATEGY****Environmental Performance Monitoring and Reporting Requirements**

- Operational monitoring of emissions and discharges (refer to Section 6.6.1).
- All emissions will be reported to Eni.
- Flare emissions and fuel gas usage will be measured.
- Diesel usage recorded.
- Any release of ODS will be immediately reported to Eni.



## 5.5 MARINE PESTS MANAGEMENT STRATEGY

MARINE PESTS MANAGEMENT STRATEGY		
Applicable Activities		
<ul style="list-style-type: none"> <li>Control of marine pest species potentially carried in the ballast water or on the hulls of the drillship and supply vessels.</li> </ul>		
Potential Environmental Effects		
<ul style="list-style-type: none"> <li>Displacement or mortality (including predation) of native species in Timor Leste or Australian waters.</li> <li>Direct competition for resources (food sources, habitat niches) with native species in Timor Leste or Australian waters.</li> <li>Impacts of control measures upon native species in Timor Leste or Australian waters.</li> </ul>		
Corporate Commitments		
<ul style="list-style-type: none"> <li>Set objectives and targets, implemented through appropriate programmes, thus ensuring the continual improvement in overall HSE performance.</li> <li>Comply with relevant legislation and other requirements to which Eni Timor Leste subscribes or apply company standards where relevant laws and regulations do not exist.</li> <li>Maintain a documented HSE Integrated Management System certified to ISO14001 which enables comprehensive reporting and review of performance.</li> <li>Prevent pollution and minimise greenhouse gas emissions, effluents, discharges and other impacts on the environment while safeguarding our resources.</li> </ul>		
Regulatory Requirements		
<ul style="list-style-type: none"> <li>Australian Quarantine &amp; Inspection Service (AQIS) Ballast Water Management Requirements Ver4, 2008 (Commonwealth).</li> <li>International Convention for the Control and Management of Ships' Ballast Water and Sediments, 2004.</li> <li>Australian National Biofouling Guidance for the Petroleum Production and Exploration Industry (2009).</li> </ul>		
Performance Objectives	Targets	Key Performance Indicators
<ul style="list-style-type: none"> <li>Prevent the introduction of marine pest species</li> </ul>	<ul style="list-style-type: none"> <li>No introductions of marine pest species into Timor Leste or Australian waters</li> </ul>	<ul style="list-style-type: none"> <li>Risk assessment indicates low risk</li> <li>Current Antifouling Certification or Biofouling Record Book maintained</li> <li>Ballast water transfer records</li> </ul>

## MARINE PESTS MANAGEMENT STRATEGY

### Management Strategies

- Project induction will emphasise the importance of minimising the introduction of NIMS via ballast water and biofouling into Timor Leste and Australian waters.
- Vessels mobilising from international waters will be vetted by Eni prior to arrival on site, including conducting a risk assessment of the introduction of NIMS via ballast water and biofouling.
- Vessels are required to exchange ballast in accordance with AQIS approved methods and maintain records of ballast water exchange consistent with AQIS ballast water reporting requirements.
- Ships' masters and crews are required to be trained in AQIS ballast water and ballast tank sediment management and treatment procedures, including the maintenance of relevant records and logs.
- Vessels shall not discharge ballast water from an international source within Australia's or Timor-Leste's territorial seas (i.e. within 12nm of the coastal baseline) without the written approval of the relevant authority.
- If a vessel is deemed a high risk via biofouling, inspections for exotic species will be undertaken prior to the vessel arriving at site. Inspections and vessel cleaning will be undertaken as per AQIS requirements as necessary.
- Vessels are required to maintain its internal seawater systems free of biofouling and retain records of inspections, maintenance, treatments and monitoring performed.
- Vessels are required to clean items periodically immersed in water prior to mobilisation from international waters and retain records of cleaning carried out.

### Engineering (As-built) Controls

- Each vessel is required to have in place a current anti-fouling coating that complies with the applicable requirements of Annex 1 of the International Convention on the Control of Harmful Anti-Fouling Systems on Ships and a Statement of Compliance.

### Operations Procedural Controls

- *Saipem 10000 Operations Manual*
- *Saipem 10000 Ballast Water Management Plan*
- *Saipem 10000 Biofouling Record Book*
- *Eni Australia (2009). HSE Standard Marine Pests & Quarantine Management. ENI-HSE-ST-034*

### Environmental Performance Monitoring and Reporting Requirements

- Ballast water exchange records.
- Antifouling records and certificate of IMO compliance.
- Biofouling inspection and cleaning records (vessel hull, internal systems, submersible equipment)

## 5.6 MARINE WASTE MANAGEMENT STRATEGY

MARINE WASTE MANAGEMENT STRATEGY		
<b>Applicable Activities</b>		
<ul style="list-style-type: none"> <li>Management of hazardous and non-hazardous waste generated by the drillship and supply vessels.</li> </ul>		
<b>Potential Environmental Effects</b>		
<ul style="list-style-type: none"> <li>Marine pollution from inappropriate handling and disposal.</li> <li>Long term liabilities associated with clean-up.</li> <li>Inefficient waste reuse and recycling due to inappropriate waste segregation.</li> <li>Increased loading on existing shore-based waste management facilities.</li> </ul>		
<b>Corporate Commitments</b>		
<ul style="list-style-type: none"> <li>Set objectives and targets, implemented through appropriate programmes, thus ensuring the continual improvement in overall HSE performance.</li> <li>Comply with relevant legislation and other requirements to which Eni Timor Leste subscribes or apply company standards where relevant laws and regulations do not exist.</li> <li>Maintain a documented HSE Integrated Management System certified to ISO14001 which enables comprehensive reporting and review of performance.</li> <li>Prevent pollution and minimise greenhouse gas emissions, effluents, discharges and other impacts on the environment while safeguarding our resources.</li> </ul>		
<b>Regulatory Requirements</b>		
<ul style="list-style-type: none"> <li>MARPOL ANNEX V: Prevention of pollution by garbage from ships</li> </ul>		
Performance Objectives	Targets	Key Performance Indicators
<ul style="list-style-type: none"> <li>No unauthorised overboard waste disposal</li> </ul>	<ul style="list-style-type: none"> <li>Zero incidents of incorrect waste disposal</li> </ul>	<ul style="list-style-type: none"> <li>Waste Disposal Records</li> <li>Number of Non-conformance Incidents</li> </ul>
<ul style="list-style-type: none"> <li>Ensure waste requiring disposal is consigned to appropriate disposal facilities</li> </ul>	<ul style="list-style-type: none"> <li>Zero occurrences of inappropriate waste disposal reported by waste contractor</li> </ul>	<ul style="list-style-type: none"> <li>Waste Disposal Records</li> <li>Number of Non-conformance Incidents</li> </ul>
<ul style="list-style-type: none"> <li>Maximise waste recycling and reuse</li> </ul>	<ul style="list-style-type: none"> <li>All segregated recyclable waste to be consigned to recycling contractors</li> </ul>	<ul style="list-style-type: none"> <li>Waste Disposal Records</li> <li>Number of Non-conformance Incidents</li> </ul>

**MARINE WASTE MANAGEMENT STRATEGY****Management Strategies**

- Project induction will emphasise the importance of implementing correct management of waste practices.
- Hazardous waste will be collected and stored in a bunded, signed area, then transferred ashore for disposal
- No garbage shall be disposed of over board.

**Engineering (As-built) Controls**

- Oily waste drainage and treatment systems to retain oily wastes onboard for onshore disposal.
- Treatment systems onboard for sterilisation of sewage wastes and comminution of sewage and putrescible wastes to <25mm prior to discharge.
- Dedicated waste segregation and storage areas for onshore disposal of solid and hazardous wastes.

**Operations Procedural Controls**

- *Saipem Operations Manual*
- *Eni Australia (2008). HSE Standard Liquid and Solid Discharges. ENI-HSE-ST-023*
- *Eni Australia (2008). HSE Standard Waste management. ENI-HSE-ST-025*

**Environmental Performance Monitoring and Reporting Requirements**

- Operational monitoring of waste streams (refer to Section 6.6.1).
- Waste manifests to be sent onshore with waste from vessels.
- Waste disposal records will be provided to Eni by waste management subcontractor.
- Report waste handling incidents using the Incident Report Form in Eni's procedure: *Hazard and Incident Reporting and Investigation*.

## 5.7 MARINE FAUNA MANAGEMENT STRATEGY

MARINE FAUNA MANAGEMENT STRATEGY		
Applicable Activities		
<p>Marine activities that may result in interaction with wildlife:</p> <ul style="list-style-type: none"> <li>• Vessel traffic to/ from the drillship.</li> <li>• Air traffic (helicopters).</li> <li>• Noise and vibration from vessels.</li> <li>• Night time lighting of drillship and support vessels.</li> <li>• Discharge of cuttings directly to seabed during riser-less drilling.</li> </ul>		
Potential Environmental Effects		
<ul style="list-style-type: none"> <li>• Disturbance to the migration, feeding and breeding of wildlife</li> <li>• Injuries or mortality of wildlife due to physical impact</li> <li>• Smothering of benthic organisms.</li> </ul>		
Corporate Commitments		
<ul style="list-style-type: none"> <li>• Set objectives and targets, implemented through appropriate programmes, thus ensuring the continual improvement in overall HSE performance.</li> <li>• Comply with relevant legislation and other requirements to which Eni Timor Leste subscribes or apply company standards where relevant laws and regulations do not exist.</li> <li>• Maintain a documented HSE Integrated Management System certified to ISO14001 which enables comprehensive reporting and review of performance.</li> <li>• Prevent pollution and minimise greenhouse gas emissions, effluents, discharges and other impacts on the environment while safeguarding our resources.</li> </ul>		
Regulatory Requirements		
<ul style="list-style-type: none"> <li>• APPEA Code of Environmental Practice 2008</li> </ul>		
Performance Objectives	Targets	Key Performance Indicators
<ul style="list-style-type: none"> <li>• Disturbance to wildlife to be minimised</li> </ul>	<ul style="list-style-type: none"> <li>• Zero incidents of physical harm to protected wildlife</li> </ul>	<ul style="list-style-type: none"> <li>• Number of wildlife harm incident reports</li> </ul>

**MARINE FAUNA MANAGEMENT STRATEGY****Management Strategies**

- Environmental induction will emphasise the importance of harming marine wildlife.
- Interactions between vessels and cetaceans during the Cova-1 drilling program shall be consistent with the Australian National Guidelines for Whale and Dolphin Watching (2005). Watch will be maintained at all times on vessels under way. Should any cetaceans be observed in the vicinity of vessels all necessary care to avoid collisions will be taken.
- The drillship shall be pre-loaded with supplies and drilling materials to the greatest extent possible to minimise the requirement for additional supply during the drilling program.
- Helicopter flights will be conducted during daylight hours only, except in emergency or training situations. Helicopter flights will be conducted in accordance with the Australian National Guidelines for Whale and Dolphin Watching (2005) and will as far as practical under general civil aviation rules
  - not fly lower than 500m within a 500m radius of a whale or dolphin (no fly zone).
  - not hover over the no fly zone.
  - avoid approaching a whale or dolphin head on.
  - avoid flying directly over, or passing the shadow of the helicopter directly over a whale or dolphin.

**Environmental Performance Monitoring and Reporting Requirements**

- Post-drilling ROV survey undertaken to confirm the fate of riser-less drill cuttings on the seabed.
- Report wildlife interaction incidents using the Incident Report Form in Eni's procedure: *Hazard and Incident Reporting and Investigation*

## 6. IMPLEMENTATION STRATEGY

### 6.1 INTRODUCTION

This section details the procedures that will be in place for the drilling of the Cova-1 well. These include responsibilities, training, reporting frameworks, mitigation & response activities and monitoring & auditing procedures which are intended to reduce environmental risk to ALARP and to ensure that environmental performance criteria are met.

### 6.2 MEASURES TO ENSURE ENVIRONMENTAL PERFORMANCE ARE MET

Drilling campaigns are the responsibility of Eni. Saipem will operate the *Saipem 10000* drillship on behalf of Eni. Eni representatives aboard the drillship will ensure that this EMP and the Eni HSE Policy are correctly implemented.

### 6.3 SYSTEMS, PRACTICES AND PROCEDURES

#### 6.3.1 General

The project will be implemented under the umbrella of Eni's HSE Policy (Appendix A), which Saipem must abide by. Saipem will also be required to have in place formal, written systems, practices and procedures for management of HSE (and emergency response, including oil spill response). These systems, practices and procedures will be reviewed and determined to be acceptable by Eni prior to commencement of operations. An Eni representative will accompany the drillship for the duration of the drilling activity.

As the Operator, Eni will ensure that its personnel and contractors comply with all regulatory controls under the Product Sharing Contract, this EMP and other relevant legislation, as listed in Section 1.4.

Key aspects of Eni's environmental management strategies include:

- Eni's HSE Integrated Management System (ENI-HSE-IN-002);
- Eni Crisis Management Plan (ENI-0000-PF-0501);
- Eni Saipem 10000 Drilling Campaign Emergency Management Plan; and
- PSC-S06-03 OSCP (TL-HSE-PL-006).

Key aspects of Saipem's environmental management strategies include:

- Saipem Emergency Response Manual - Offshore;
- Use of personnel with local area experience; and
- Compliance with the APPEA Code of Environmental Practice.

All Eni and contractor personnel will receive an environmental induction prior to the commencement of the drilling programme. The environmental induction will instruct personnel on the issues and management actions identified in this EMP.



### 6.3.2 Emergency Response Manual

Eni's *Saipem 10000 Drilling Campaign Emergency Management Plan* describes Eni's preparations for emergency response, including details on organisational structure, incident management protocols and investigation arrangements.

### 6.3.3 OSCP and Resources

Eni's PSC-S06-03 OSCP (TL-HSE-PL-006) describes Eni's specific emergency response arrangements in the event of an oil spill. In the event of an oil spill, equipment can be sourced through the Australian Institute of Petroleum Regional Industrial Controller and through the Australian Marine Oil Spill Centre (AMOSC) in Geelong, Victoria. Eni, as a member of AMOSC, has priority access to equipment and training.

## 6.4 CHAIN OF COMMAND AND ROLES AND RESPONSIBILITIES

### 6.4.1 Eni Crisis Management Team Leader (Managing Director)

The Eni Crisis Management Team Leader (Managing Director) will be responsible for:

- resourcing and compliance with Eni's HSE policy;
- facilitating an emergency response strategy in the event of an incident;
- facilitating communication with company personnel, government and the media in the event of an incident; and
- ensuring overall compliance with the Eni EMP with advice from the Eni HSE Adviser.

### 6.4.2 Eni Representative onboard the drillship

The Eni Representative onboard the drillship will be responsible for:

- ensuring Saipem performs all operations in a manner consistent with the performance objectives detailed in this EMP;
- reporting all incidents through to Eni and notifying ANP in accordance with Eni's Procedure: Hazard and Incident Reporting and Investigation (Eni, 2007a);
- recording recordable incidences; and
- ensuring all personnel receive Eni's environmental induction prior to the commencement of drilling.

#### **6.4.3 Drillship Offshore Installation Manager (OIM)**

The Drillship OIM will be responsible for:

- ensuring all operations aboard the drillship are carried out in a manner consistent with this EMP;
- ensuring that Eni's HSE policy is followed;
- monitoring the performance against relevant environmental procedures legislative requirements, commitments, and conditions applicable to the drilling program;
- recording incident reports into the Eni database;
- ensuring all personnel are adequately trained, competent and have the ability to carry out duties as required in this EMP; and
- notifying the Eni Representative of any incidents arising from operations that may have an adverse impact on the performance objectives identified in this EMP.

#### **6.4.4 Eni HSE Adviser**

The Eni HSE Adviser will be responsible for:

- providing the Eni EMP to the Eni Managing Director;
- reviewing the drilling contractor's HSE Management Plans for acceptability and ensuring compliance with the Eni EMP;
- reviewing environmental audits to ensure compliance with the agreed environmental performance objectives; and
- providing advice in the event of an oil spill or other environmental incidents.

#### **6.4.5 Eni Operations Manager**

The Eni Operations Manager will be responsible for:

- supervising the Eni Drilling Manager; and
- interfacing between the Crisis Management Team (CMT) and the Drilling Emergency Management Team (DEMT).

#### **6.4.6 Eni Drilling Manager**

The Eni Drilling Manager will be responsible for:

- supervising the Eni Representative;
- immediately notifying DNMA of any spill of hydrocarbons of greater than 80L;
- assisting the CMT Leader in the event of an emergency; and
- liaising with the Eni Operations Manager.

## **6.5 TRAINING, AWARENESS AND COMPETENCE**

All Eni and contractor personnel will receive training on their environmental responsibilities in connection with the Cova-1 drilling campaign. The environmental induction will instruct personnel on the issues and management actions identified in this EMP.

## **6.6 ENVIRONMENTAL MANAGEMENT MONITORING, REPORTING AND AUDITING**

### **6.6.1 Environmental Management Monitoring**

Environmental monitoring will comprise:

- An ROV survey of the seabed in the vicinity of the Cova-1 well before and after drilling; and
- Operational monitoring of emissions and discharges to the environment that result from routine drilling activities.

The objective of the onboard environmental management monitoring program is to verify that all discharges and emissions to the environment are in accordance with this Environmental Management Plan.

#### **ROV Survey**

A pre-drill ROV survey will provide baseline images of the seabed surrounding the proposed well. During the drilling program, further ROV surveys will be undertaken. The ROV survey images will be reviewed to ascertain suitability and performance of the drilling operations in respect to the deposition of drill cuttings on the seabed and the effects of turbidity on marine fauna. A report on the findings of the ROV surveys will be provided to the DNMA within one month of well completion.

#### **Operational Monitoring**

The discharge of domestic wastes will be periodically monitored by the Eni representative to ensure that the performance standards in place for the activity will be met. All solid and hazardous wastes stored onboard and transferred onshore for disposal will be recorded in a waste manifest. Volumes of fuel used and crude consumed during operations will also be recorded on daily logs. Table 6.1 presents the operational monitoring program to be implanted during the Cova-1 well drilling program. Eni will submit a compliance report to DNMA, as required, outlining the results of its monitoring program.

**Table 6.1: Operational monitoring**

Environmental Risk	Criteria to be Monitored	Inspection
Drilling Chemicals	Chemical characteristics; Ecotoxicity; Biodegradability; Potential for bioaccumulation.	Prior to drilling
	Volume on board, volume used and volume discharged	Daily recorded in the operational log inspection
Drill floor drainage	All drainage directed to sumps ahead of oil-in-water separators	Prior to drilling and once during campaign
Laboratory Wastes	Type, usage, toxicity	Prior to and on completion of drilling
Chemicals and hazardous materials	Volume stored and volume consumed	Daily operational inspection of the storage area, management and transfer procedures and log sheet update
Sewage discharge	Correct operation of sewage treatment system	At start and once during campaign
General rubbish disposal	Volume of waste generated and volume transferred for onshore disposal	Prior to waste transfers to supply vessels
Hazardous waste disposal	Volume of waste generated and volume transferred for onshore disposal	Prior to waste transfers to supply vessels
Flared well fluids emission	Volume flared	Ongoing during flaring
Diesel usage	Volume on board and volume consumed	Daily operational log inspection and fuel transfer log sheet
Oil spills	Type and volume	Ongoing through daily operational log and incident reporting system
Chemical spills	Type and volume	Ongoing through daily operational log and incident reporting system

## 6.6.2 Reporting

### Routine reporting

Eni will produce a Well/Project Completion Environmental Report which details the results of the ROV survey, the monitoring program outlined in Table 6.1 and any incidents that occurred during the campaign. The report will be provided to the DNMA within six weeks of well completion.

### Incident reporting

All environmental incidents or deviations from the EMP will be reported in accordance with Eni's Procedure: *Hazard and Incident Reporting and Investigation*. Additionally, all incidents arising out of operations for the activity that are not within the parameters of the environmental performance standards in the EMP shall be reported.

DNMA shall be notified within 48 hours upon the occurrence of an:

- escape of discharge into the sea of a mixture of petroleum and water in which the petroleum concentration was greater than 25ppm;
- escape or discharge into the sea of more than 80L of petroleum, not being the above; and
- uncontrollable escape or ignition of petroleum or any other flammable or combustible material causing a potentially hazardous situation.

The written report will specify:

- the date, time and place of the occurrence;
- the quantity or approximate quantity of liquid that escaped or burned;
- particulars of damage caused by the escape or ignition;
- the events so far as they are known or suspected that caused or contributed to the escape or ignition;
- particulars of methods used to control the escape or ignition;
- particulars of methods used or proposed to be used to repair property damaged by the escape or ignition; and
- measures taken, or to be taken, to prevent a possible recurrence of the escape or ignition.

## 6.6.3 Surveillance Audit Program

The primary objective of the audit program is to ensure the requirements of the EMP, legislation and guidelines are being met. The results of the audits will be used to review environmental targets and to monitor their effectiveness.



Table 6.2 presents the proposed audit program.

**Table 6.2: Proposed audit program**

Audit	Audit Focus
Planning Stage (2 weeks prior to mobilisation to drilling site)	<p>The objective of the audit is to ensure that the planned environmental strategies are in place prior to the commencement of the drilling activities.</p> <p>The audit will be a desktop and will primarily assesses compliance against:</p> <ul style="list-style-type: none"> <li>• The EIS, EMP, Contractor Management Systems and Plans and specific approval requirements;</li> <li>• Agency/stakeholder notification/consultation;</li> <li>• Necessary control measures/equipment and tools on board.</li> </ul>
Drilling Stage (During drilling operation)	<p>The objective of the operations audit is to verify that the EMP is being implemented during the drilling operation.</p> <p>The audit primarily:</p> <ul style="list-style-type: none"> <li>• assesses compliance against EMP requirements; identifies areas for improvement,</li> <li>• reviews the appropriateness/efficiency of mitigation measures and</li> <li>• recommends or suggests additional mitigation measures, as required.</li> </ul>
Demobilisation Stage (1 week before demobilisation from site)	<p>The objective of this audit is to ensure:</p> <ul style="list-style-type: none"> <li>• all wastes generated on board are properly disposed of,</li> <li>• ROV surveys have been conducted confirming that all materials/equipment have been removed from the drilling sites and to provide a record of post drill status.</li> </ul>

Eni personnel or second party consultants will conduct the audit in accordance with Eni's Procedure: *HSE Auditing*. A report will be produced and non-conformances will be incorporated into the current and future campaigns.

## 6.7 REVIEW OF THE EMP

This EMP will be reviewed:

- when an environmental audit of the drilling campaign finds significant breaches of the EMP requirements; or
- if any significant new environmental risk or effect, or significant increase in an existing environmental risk or effect occurs that is not provided for in the existing EMP.

Any significant incident occurring during operations would also trigger a review of the EMP.



## 7. REFERENCES

- AUSGEO. (2003). Issue No. 69 Timor Sea Activity, March 2003.
- BOM. (2009). Bureau of Meteorology. Commonwealth of Australia. Website: <http://www.bom.gov.au>
- Burke, L, Selig, L and Spalding, M. (2002). *Reefs at Risk in Southeast Asia*. World Resources Institute.
- CI. (2007). Biodiversity Hotspots. Center for Applied Biodiversity Science, Conservation International.
- CIA. (2009). *Central Intelligence Agency – The World Factbook*. Website: [www.cia.gov/library/publications/the-world-factbook](http://www.cia.gov/library/publications/the-world-factbook)
- Cresswell G, Frifche A, Peterson J and Quadfapel D. (1993). *Circulation in the Timor Sea*, Journal of Geophysical Research, 98:369-379.
- CSIRO. (1999a). *Survey And Stock Size Estimates Of The Shallow Reef (0-15m Deep) And Shoal Area (15-50m Deep) Marine Resources And Habitat Mapping Within The Timor Sea Mou74 Box Volume 1: Stock Estimates And Stock Status*. CSIRO.
- CSIRO. (1999b). *Survey And Stock Size Estimates Of The Shallow Reef (0-1m Deep) And Shoal Area (15-50m Deep) Marine Resources And Habitat Mapping Within The Timor Sea Mou74 Box Volume 3: Seabirds And Shorebirds Of Ashmore Reef*. CSIRO.
- Dunlop, N.J., Surman, C.A. and Wooler, R.D. (1995). *Distribution and abundance of seabirds in the Eastern Indian Ocean: an analysis of potential interactions with the offshore petroleum industry*. A report to the Australian Petroleum Production and Exploration Association.
- Eni (2007). *3D Seismic Survey Environmental Management Plan*. Document reference ENI-0000-BN-0001. Eni Timor Leste S.p.A, Perth, Western Australia.
- Eni (2008). *Albacora 3D Survey Report*.
- FishBase. (2006). *FishBase*. World Wide Web electronic publication. Froese, R. and D. Pauly. Eds., [www.fishbase.org](http://www.fishbase.org), version (10/2006).
- Heyward, A. J. and Smith, I. D. (1996). *Analysis of Timor Sea Macrobenthos from ROV Video – Bayu-Undan*. Produced at the request of BHP Petroleum Pty. Ltd. By the Australian Institute of Marine Science, Dampier, Western Australia: in Leprovost Dames and Moore (1997), Appendix C.
- Heyward, A., Pinceratto, E. and Smith L. (1997). *Big Bank Shoals of the Timor Sea: an Environmental Resource Atlas*. Brisbane.
- Jasarevic, T. (2002). *Reviving fisheries in East Timor – Casting nets for development*. UN Volunteers, UNV News, #93, August 2002.

- Jenner, C., Jenner, M N. And McCabe, K. (2001). *Geographical and Temporal Movements of Humpback Whales in Western Australian Waters – a Preliminary Report and Description of a Computer Assisted Matching System*. Centre for Whale Research (Western Australia) Inc., Fremantle.
- LeProvost Dames & Moore. (1997). *Bayu-Undan Infield Development – Preliminary Environmental Report (PER)*. Report produced for BHP Petroleum Pty Ltd and Phillips Petroleum Company by LeProvost Dames & Moore, Perth, Western Australia.
- Marsh, I.M and Marshall, J. I. (1983). *Some Aspects of the Zoogeography of North-Western Australian Echinoderms*. Bulletin of Marine Science 33(3):671:687.
- McCauley, R. (1998). *Radiated Underwater Noise Measured from the Drilling Rig Ocean General, Rig Tenders Pacific Ariki and Pacific Frontier, Fishing Vessel Reef Venture and Natural Sources in the Timor Sea, Northern Australia*. Report prepared for Shell Australia, Melbourne, July 1998.
- Ross, JP (ed.). (1998). *Crocodiles. Status Survey and Conservation Action Plan* [Online]. 2<sup>nd</sup> Edition. IUCN/SSC Crocodile Specialist Group. IUCN, Gland, Switzerland and Cambridge, UK.  
(<http://www.flmnh.ufl.edu/natsci/herpetology/act-plan/plan1998a.htm>).
- Sandlund, OT, Bryceson, I, de Carvalho, D, Rio, N, da Silva, J, Silva, MI. (2001). *Assessing Environmental Needs and Priorities in East Timor*. Final Report. UNDP Dili and Norwegian Institute for Nature Research, Trondheim, Norway.
- SKM. (2001). *Sunrise Gas Project Draft Environmental Impact Statement*. Prepared by Sinclair Knight Merz for Woodside Energy Ltd, Perth, Australia.
- Storr, GM, Smith, LA & Johnstone, RE. (1986). *Snakes of Western Australia*. WA Museum, Perth, Australia.
- Sustainability. (2010). *Cova Drill Cuttings Dispersion Modelling*. Unpublished report prepared by Sustainability Pty Ltd for Eni Timor Leste S.p.A, Perth, Western Australia.
- Swan, J.M., Neff, J.M. & Young, P.C. (eds.). (1994). *Environmental Implications of Offshore Oil and Gas Development in Australia, the Findings of an Independent Scientific Review*. Australian Petroleum Exploration Association (APPEA), Energy Research and Development Corporation (ERDC), Australia.
- timorNET. (2007). *East Timor, an Information Service on East Timor*. University of Coimbra, Portugal.
- Tranter, D. (1962). *Zooplankton abundance in Australasian Waters*. Australian Journal of Marine and Freshwater Research 13(2):106-142.

- UNEP-WCMC (2006). *Marine Turtle Interactive Mapping system (IMAPS)*, – *Interactive Map Service* (<http://bure.unep-wcmc.org/imaps/indturtles/viewer.htm>) Marine Programme, UNEP World Conservation Monitoring Centre, Cambridge, UK.
- Veron, JEN And Stafford-Smith, M. (2000). *Corals of the World*. AIMS, Cape Ferguson.
- Wijffels, S.E., Bray, N., Hautala, S., Meyers, G. and Morawitz, W.M.L. (1996). *The WOCE Indonesian Throughflow Repeat Hydrography Sections: I10 and IR6*. WOCE, 24.
- Wilson, B.R. & Allen, G. (1987). *Major Components and Distribution of Marine Fauna*. In: *Fauna of Australia, Vol 1a - General Articles*. Australian Government Publishing Service, Canberra 1987.
- World Bank. (2005). *World Bank Country assistance Strategy for Timor-Leste FY06-08*. Report No. 32700-TP, 18-Aug-05. Timor-Leste Country Management Unit, World Bank.
- Wyatt, ASJ. (2004). *Preliminary survey of the nearshore coastal marine environment of the south coast of East Timor: a baseline for assessing the impacts of a developing nation*. Bachelor of Engineering thesis, University of Western Australia (Nov 2004).



## APPENDICES



## APPENDIX A

# ENI HEALTH, SAFETY AND ENVIRONMENT POLICY





timor leste

## Health, Safety & Environment Policy

In our hydrocarbon, exploration and production activities, Eni Timor Leste and its associated companies are committed to maintaining a strong and effective culture in Health, Safety and Environment (HSE) for everyone involved in our activities.

This policy applies to all operational and project activities under Eni Timor Leste's control, including activities carried out by contractors.

Eni Timor Leste will:

- ✓ Set Health, Safety and Environment as a core value for all business activities;
- ✓ Play a leading role in promoting best HSE practice throughout our activities;
- ✓ Set objectives and targets, implemented through appropriate programmes, thus ensuring the continual improvement in overall HSE performance;
- ✓ Implement safe working procedures and fitness to work programmes to pursue the goal of zero harm to anyone, anytime in an injury-free workplace;
- ✓ Comply with relevant legislation and other requirements to which Eni Timor Leste subscribes or apply company standards where laws and regulations do not exist;
- ✓ Assess and manage HSE risks across each life cycle for all business activities;
- ✓ Maintain a documented HSE Integrated Management System certified to ISO14001 which enables comprehensive reporting and review of performance;
- ✓ Include HSE performance in appraisal of staff and contractors;
- ✓ Prevent pollution and minimise greenhouse gas emissions, effluents, discharges and other impacts on the environment while safeguarding our resources; and
- ✓ Remain committed to sustainable development and the welfare of our host communities.

Eni Timor Leste expects that everyone recognises their personal responsibility for HSE and their right to report openly any HSE issue or concern. In addition, everyone is obliged to intervene in the case of unsafe acts or conditions.

To ensure we meet these objectives and respect the interests of those who may be affected by our operations, Eni Timor Leste will consult with, listen to and respond openly to all staff, contractors, regulators, customers and host communities.

Country Representative  
Eni Timor Leste S.p.A.

Tony Heynen

24 March 2010



## **APPENDIX B**

# **SAIPEM 10000 SPECIFICATION**





Saipem

GROUP

Drilling

Saipem 10000





# Saipem 10000

The Saipem 10000 ultra-deepwater drillship is the latest vessel to join Saipem's drilling fleet and represents an innovative and advanced addition to oil and gas exploration and production worldwide.

Built by Samsung Heavy Industries in its Koje shipyard in South Korea and completed in 2000, Saipem 10000 is a drillship for the new millennium.

The vessel has been designed and built to Class III Dynamic Positioning specifications making it capable of worldwide, year-round operations.

The main operating areas for Saipem 10000 will be the US Gulf of Mexico, South Atlantic, West Africa and, during the summer weather window, the UK sector of the North Sea and West of Shetlands.

Saipem 10000 has been built to set a new standard in drilling activities. The vessel has been designed and completely outfitted to explore and develop hydrocarbon reservoirs down to 30,000 ft RKB, operating in water depths in excess of 10,000 ft in full DP mode.











# Saipem 10000

## BRIEF DESCRIPTION

The main operational modes of the vessel in DP are the following:

- drilling activities  
(exploration/appraisal/development);
- early production and extensive well  
production/testing;
- crude oil storage and offloading;
- well completion activities.

All of the equipment installed onboard the vessel has been designed to meet the most stringent health, safety and environmental standards.

Among the chief benefits gained through operating with the Saipem 10000 are the particular arrangement of drilling facilities, the high pay load capacity and its Extended Well Testing facilities.

The arrangement of the vessel's topsides equipment allows the drilling crew to conduct several activities simultaneously, thereby optimising the sequence of operations and reducing downtime between different phases. The Saipem 10000's pay load, recorded at more than 20,000 t, permits the loading of large quantities of consumables, reducing the necessity of frequent reloading and the number of required supply vessel trips and, consequently, cutting overall operating costs for the client. Saipem 10000 is fitted with Extended Well Testing facilities that allow for the storage of up to 140,000 barrels of crude oil and has offloading capabilities to avoid the need for flaring, thus limiting environmental impact whilst optimising cost.





#### INTEGRATED MANAGEMENT SYSTEM

The Saipem 10000 holds the ABS and 'ACCU' notation, meaning all vessel automation and instrumentation is in line with the unattended machinery space class requirements. Based on the operating philosophy of DP Class III, the Integrated Automated System (IAS) is fibre optic based and fully integrated with the drilling control system.

A dual data highway will carry signals to and from operator stations located in the bridge, cargo control centre and engine control room.

The main subsystems incorporated in IAS are the following:

- power generation/manoeuvring;
- auxiliary system control and monitoring;
- cargo/ballast;
- riser management system;
- serial interface with the following systems:
  - Drilling Integrated Systems (DIS);
  - gas detection systems;
  - tank level gauging system;
  - fire detection system;
  - emergency shutdown system.

#### ACCOMMODATION

The accommodation module, built in accordance with ABS regulations, has been designed to accommodate 172 people with a high degree of comfort and includes two recreation rooms, coffee shop, sauna and gymnasium.

# Vessel specifications

## UNIT TYPE

Ultra deep water drillship, equipped with EWT (Extended Well Testing), designed for exploration and development drilling down to 30,000 ft RKB, operating in water depth in excess of 10,000 ft

## UNIT FLAG

Bahamas

## UNIT CLASSIFICATION

ABS +A1(E), "Drilling Unit", +FPSO, +AMS, +ACCU, +DPS-3, OMBO, DLA, +CDS

## UNIT DESIGN

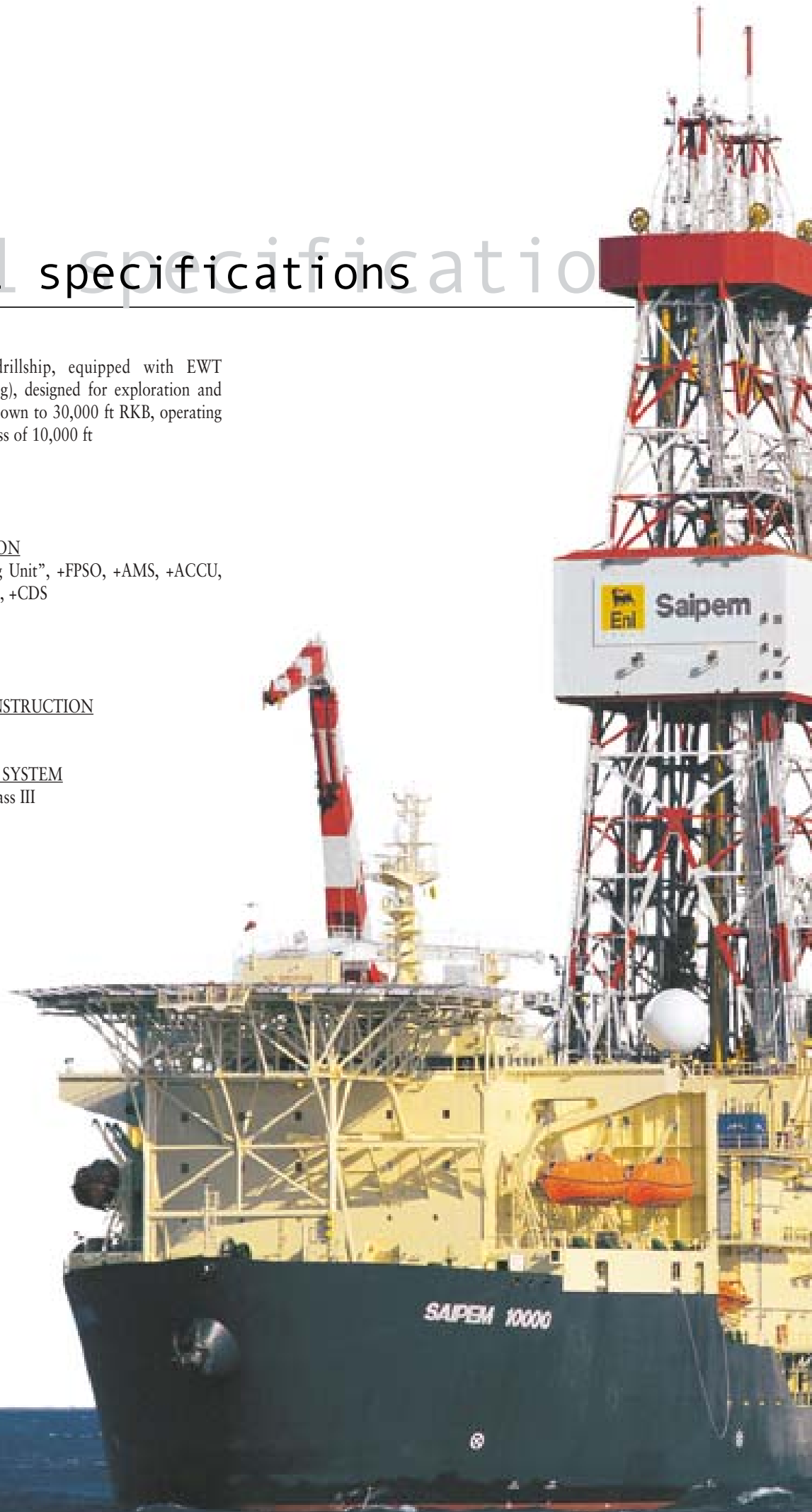
Samsung

## YEAR OF UNIT CONSTRUCTION

1999-2000

## UNIT POSITIONING SYSTEM

Simrad SDP-32, DP class III





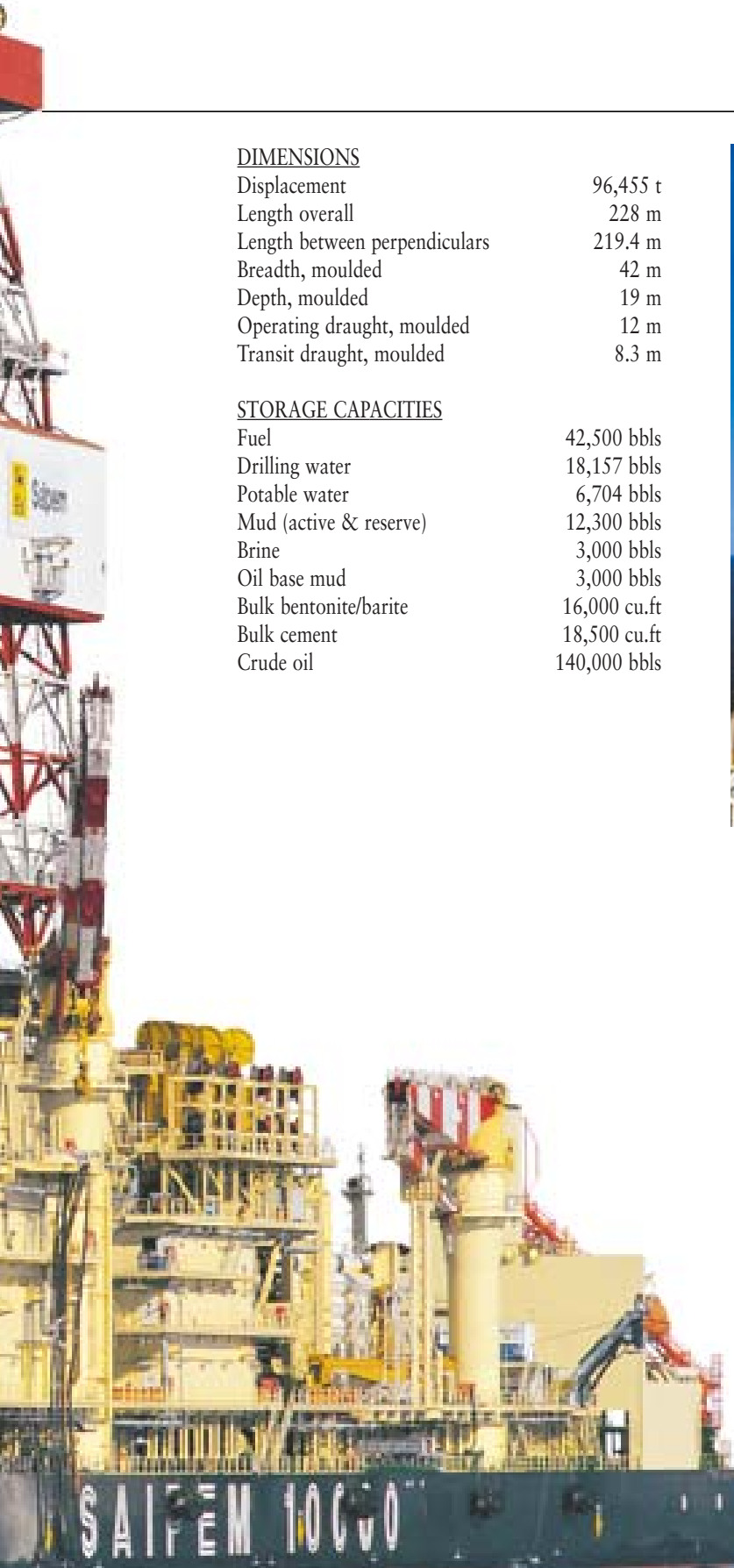


#### DIMENSIONS

Displacement	96,455 t
Length overall	228 m
Length between perpendiculars	219.4 m
Breadth, moulded	42 m
Depth, moulded	19 m
Operating draught, moulded	12 m
Transit draught, moulded	8.3 m

#### STORAGE CAPACITIES

Fuel	42,500 bbls
Drilling water	18,157 bbls
Potable water	6,704 bbls
Mud (active & reserve)	12,300 bbls
Brine	3,000 bbls
Oil base mud	3,000 bbls
Bulk bentonite/barite	16,000 cu.ft
Bulk cement	18,500 cu.ft
Crude oil	140,000 bbls







# Vessel specifications

## OPERATIONAL CAPABILITIES

Water depth capability in excess of 10,000 ft  
Drilling depth 30,000 ft RKB

Variable load in transit mode  
With crude oil: 20,000 t. Without crude oil: 17,000 t.  
Variable load in drilling mode  
With crude oil: 18,000 t. Without crude oil: 20,000 t.  
Variable load in survival mode  
With crude oil: 15,000 t. Without crude oil: 20,000 t.

## CRANES

4 Hydralift Knuckle Boom Cranes.  
Rated capacity 85 t. at 18.4 m

## PIPE RACK OVERHEAD CRANE

1 Hydralift Catwalk machine (loaded by Knuckle Boom Crane)

## RISER RACK OVERHEAD CRANE

1 Hydralift Catwalk machine (loaded by Knuckle Boom Crane)

## BOP HANDLING SYSTEM

1 Hydralift Overhead Crane. Rated capacity 350 t.

## X-TREE HANDLING SYSTEM

1 Hydralift Skidding System + trolley.  
Rated capacity 120 t.

## ACCOMMODATION

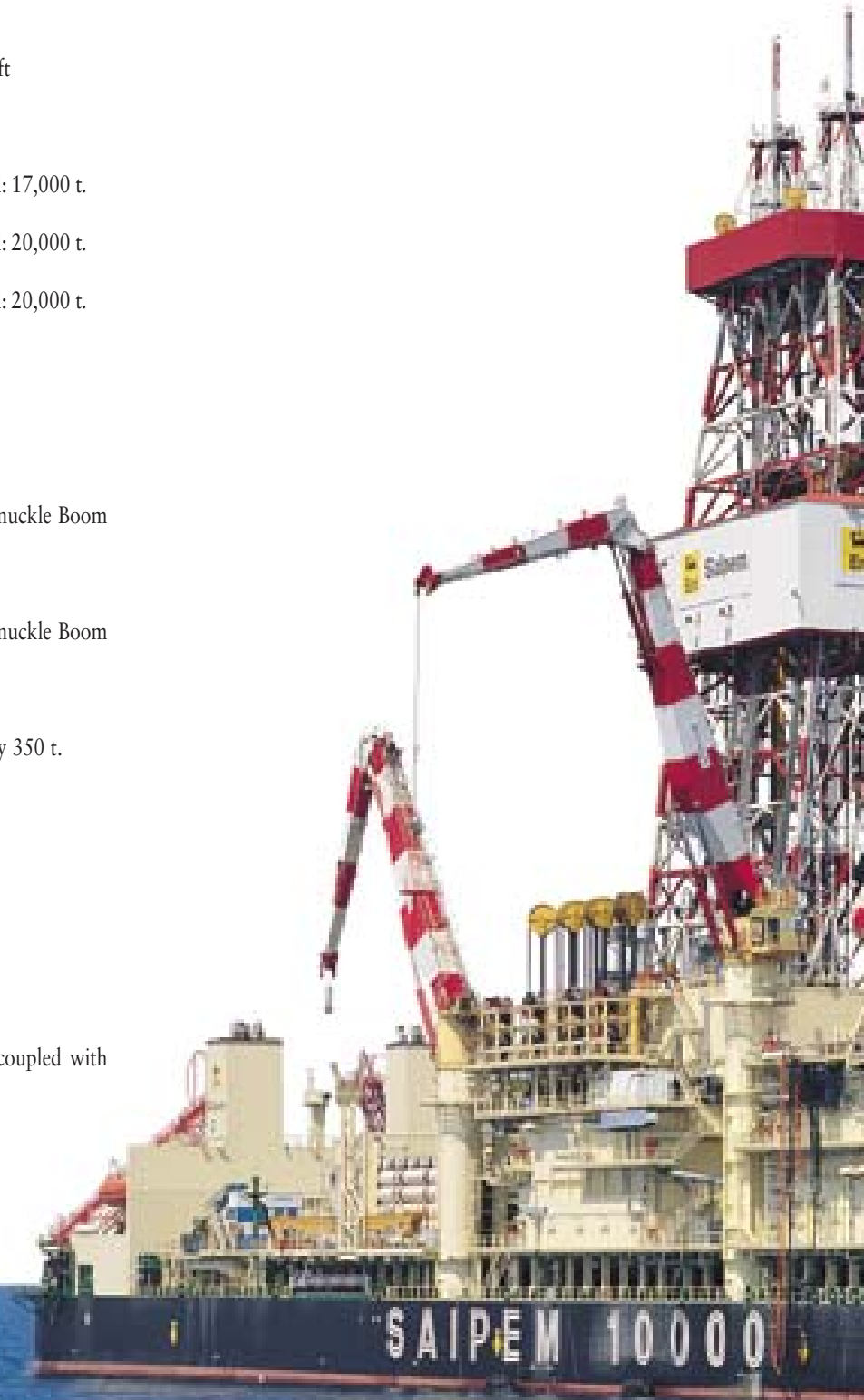
172 people

## POWER PLANT

6 Wartsila Nsd Co 18V32LNE 9,910 hp coupled with  
ABB HSG900XU10 8,750 kVA.

## VFD SYSTEM

18 ABB 600 V (Variable Frequency Drive)





# Drilling rig specifications

---







ons

<u>DERRICK</u>	Bailey	Dynamic	base 80 x 60 ft top 60 x 20 ft height 200 ft Static hook load 2,000,000 lbs
<u>SUBSTRUCTURE/RIG FLOOR RACKING PLATFORM</u>	Simultaneous setback and hook Hydralift	load capacity 2,600,000 lbs 6½" D.P. plus 5" D.P. plus 9½" D.C. plus 8¼" D.C. plus 6¼" D.C. plus 4¼" D.C. 13½" Casing or 9½" Casing or 7" Casing	252 joints Range III 121 joints Range III 6 Stands 12 Stands 6 Stands 10 Stands 80 Stands in triple 105 Stands in triple 105 Stands in triple
<u>AUTOMATIC DRILL PIPE RACKING SYSTEM</u>	Hydralift	Vertical Column Type capable to handle from 3½" D.P. to 13½" Casing	
<u>CASING STABBING BOARD</u>	Hydralift	Hydraulic basket adjustable from rig floor up to 16 m	
<u>DERRICKMAN PLTF-TV</u>	Located on upper and lower finger board with monitors located in the driller's house and TV net. Capable to camera system zoom, pan and tilt.		
<u>DRAWWORKS</u>	Wirth GH 4500 EG 4,500 hp, Re-regenerative Braking + Baylor 7838 + disk brake + back up disk brake. Powered by 3 General Electric GEB 22A1, AC.		
<u>CROWN BLOCK</u>	Hydralift	Rated capacity Sheaves	907 t 8 x 2" drilling line
<u>TRAVELLING BLOCK</u>	Hydralift	Rated capacity Sheaves	907 t 7 x 2" drilling line
<u>HOOK BLOCK</u>	Hydralift	Integrated with travelling block	
<u>SWIVEL HEAD</u>	Hydralift	Integrated with Top Drive	
<u>MOTION COMPENSATOR</u>	Hydralift	Crown mounted equipped with Active Heave Compensation System	
		Rated capacity compensated	450 t
		Rated capacity locked	907 t
		Stroke	25 ft
<u>ROTARY TABLE</u>	Wirth RTSS 60½" hydraulic	Maximum opening Rated capacity Driven by	60½" 907 t Hydraulic motor
<u>TOP DRIVE</u>	Hydralift HPS 750 2E	Rated capacity Driven by	680 t 2 x GEB 752 22 A1AC
<u>MUD PUMPS</u>	Wirth TPK 2200	4 triplex pumps, 2,200 hp each with 7,500 psi fluid end	
<u>CEMENTING UNIT</u>	BJ Services	SCP 248/RAM Driven by	2 x Caterpillar 3406 B
<u>SHALE SHAKER</u>	Brandt	6 VMS 300	
<u>DESANDER AND DESILTER</u>	Gann Mekaniske Brandt	2 installed	16 M - 3 x 12"+ 16 M - 16 x 8"
<u>DRYER</u>	BRANDT	1 VORTEX FINDER	
<u>DEGASSER</u>	Burgess	1 installed	Magnavac 1500
<u>BOP STACK</u>	Shaffer	18¾" - 15,000 Guidelineless with Vetco HD-H4 Bop Connector	
<u>RISER</u>	Abb Vetco Gray	3,000 m w.d. Type HMF 21" o.d. x 90 ft long	
<u>DIVERTER</u>	Abb Vetco Gray	KFDS Type CSO	
<u>RISER TENSIONERS</u>	Hydralift	16 x 200,000 lbs type 65' Line Travel	
<u>BOP CONTROL SYSTEM</u>	Shaffer	Multiplex with 5,000 psi Accumulator Unit	



G R O U P

**Saipem**

**Ideas, as strong as man.**



## APPENDIX C

# SEA WITCH SPECIFICATIONS

# Sea Witch



IMO no: 9392975  
 DNV id no: 27353  
 MMSI: 212 590 000  
 Call sign: 5BLT2

MAIN DESCRIPTION		MEASUREMENT	
Type :	UT 755 L	Lenght oa :	71,90 m
Classification :	DNV +IAI,SF E0 Clean	Lenght bpp :	66,00 m
	Dynpos-Auto	Breath moulded :	16,00 m
Yard :	Cochin Shipyard LTD	Depth moulded :	7,00 m
Place built :	Cochin	Draught max :	5,83 m
Country built :	India	Gross tonnage GT :	2100
Delivered :	Nov '08	Correspondign DWT :	3250 mt
Flag :	Cypros	Net tonnage NT :	1150
Port of registry :	Limasol	Speed svc/max.	14.3 Knots
Owner :	Dess Cypros LTD	ISM-Responsible :	Thome Management PTE LTD

CARGO CAPACITY		DISCHARGE RATE	
Deck cargo:	1600 t	Fuel discharge rate :	1 off 200 m3/h - 9 bar
Deck area:	680 m2	Mud discharge rate :	2 off 75 m3/h - 18 bar
Deck strength:	5,0 t / m2	Brine discharge rate :	1 off 75 m3/h - 18 bar
Fuel (gasoil) :	1000 m3	Drillwater discharge rate :	1 off 200 m3/h - 9 bar
Liquid Mud :	970 m3	Dry bulk discharge rate :	2 off 27 m3 min 5,6 bar
Brine :	390 m3	Base Oil discharge rate :	1 off 150 m3/h - 9,0 bar
Drillwater/Ballast :	850 m3	Fresh Water discharge rate :	1 off 200 m3/h - 9 bar
Base Oil :	200 m3		
Dry Bulk :	315 m3 (11250 cuft)		
Fresh Water :	840 m3		

MACHINERY / PROPULSION			
Main Engine set :	2x2725 bhp /825 rpm	Stern Thruster :	1 off 590 Kw ( 800 bhp )
Propellers :	2 off Ulstein CPP		
Rudders :	2 off T1650	Generators :	2 x 1280 kW Shaft
Total BHP :	5450 BHP	Diesel Generators :	2 x 250 kW
Total Kw :		Emergency Generator :	1 x 72 kW
Bow Thrusters:	2 off 590 kW ( 800bhp )	Shore Connection:	440 v ,60 Hz



# Sea Witch



## PERFORMANCE / CONSUMPTION

Max Speed/Consumption : 14,3 Knots/ 20 t  
 Service Speed/Consumption: 11,0 Knots / 17 t  
 Economical Speep/Consumption : 9.0 Knots / 14 t  
 Standby Mode : 2-3 knots / 4t  
 Port Consumption :

Roll reduction system : 4 off ulstein  
 passive roll  
 red.tanks

## ACCOMODATION

The vessel to have accommodation and equipment for 10 officers / crew and 12 passengers as follows:

Tween deck: 2 off 4-men cabins  
 Main deck: 1 off Change / Washroom  
 1 off Toilet room/ 1 off Spare room  
 F.C.-deck Galley and provision rooms Mess and dayroom  
 1 off Laundry/ Drying room, 1 off store room  
 A-deck 5 off 1-bed cabins for crew  
 1 off 4-men cabin/ 1 off Aircond. room  
 B-deck 5 off 1-bed cabins for officers/crew  
 Bridge deck Wheelhouse, Toilet room

## DECK

Tugger Winch : Brattvaag 2 off 10 t  
 Deck Crane : 3t/10-16m TTS-GPT 115  
 Windlass: Brattvaag PH SNF 210-40  
 Capstans: Brattvaag 2 off 8 t CMX2208

Two off starting air compressors. Sperre HL2 / 105  
 Two off starting air bottles.  
 One off instrument air drier, one instrument air tank.  
 Two off Bilge/fire pumps. All Weiler AEB1E0750-IE  
 One off Bilge water separator.  
 Four Reefer plugs Two 440V + Two 220V  
 CO2 fire fighting system in engine room.

## RESCUE EQUIPMENT

Fire Fighting equipment : Wather Mist. External Fire system  
 MOB Boats: 1x Viking  
 Radar transponders :  
 Emergency Beacon: 2 Off JRC.VHF406 MHz

Survival Suits : 22 persons  
 Life jackets : 22 persons  
 Life rafts: 4 Viking

## NAVIGATION AND COMMUNICATION EQUIPMENT

Dynamic Position : AUT (DP1) Kongsberg  
 Radar 3 cm: JRC.JMA 9922 SXA  
 Radar 10 cm: JRC.JMA 9932 SA  
 Radar Slave : One on aft bridge  
 Direction Finder : John Lillie & Gillie LTD  
 Gyro: Tokimec Inc -TG- 8000  
 Autopilot: Tokimec Inc -Pr-6114A-22  
 Navtex : JRC.NCR - 333  
 Joystick : Poscon(RRM)  
 AIS : JRC.JHS - 182  
 Echo Sounder : JRC.JFE 585  
 Speed log : JRC.JLF 205  
 Satellite Navigator (GPS) DGPS.JRC.JRL-77MK2  
 Wind Sensors: John Lillie & Gillie LTD

GMDSS Sea Area: A3  
 MF/HF Radio : JRC.JSS - 296  
 DSC Receiver : JRC.JHS - 32B  
 VHF 1 : JRC.JHS - 7  
 VHF 2: JRC.JHS - 7  
 VHF 3 : JRC.JHS - 7  
 Portabel UHF : 4x JRC.JHS - 430  
 Mobil Telephone : Yes  
 Iridium : Inmarsat Fleet 77  
 Mini-M : Inmarsat JRC.JUE 85  
 Sat C 1 : JRC.JQE-3A  
 Intercom System : Yes

DETAILS PROVIDED HEREIN ARE BELIEVED TO BE ACCURATE HOWEVER ARE WITHOUT WARRANTY.  
 INTERESTED PARTIES ARE ENCOURAGED TO INSPECT THE VESSEL TO SATISFY REQUIREMENTS

# Sea Witch

