

Investigation Brief

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Date: 19/05/2021

Facility/Premises:	Schlumberger Perth Office - Level 5, 10 Telethon Avenue, PERTH WA 6000
RMS ID:	IVT 10524
Dutyholder:	Schlumberger Australia Pty Ltd (no longer a title holder)
Dates of investigation:	To be confirmed
Prepared by:	[REDACTED]

1. Investigation Team

The investigation team comprised the following personnel:

Lead inspector:	[REDACTED]
Investigation team:	[REDACTED]
Subject matter expert:	[REDACTED]

2. Investigation Objectives

The National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) has directed NOPSEMA Inspectors to conduct the inspection (investigation) in accordance with the powers and provisions defined in Part 2 of the Regulatory Powers (Standard Provisions) Act 2014. The investigation also includes consideration of all associated regulations and good oil field practice.

The objectives of the investigation are to identify regulatory non-compliance and where identified take appropriate enforcement action consistent with NOPSEMA's enforcement policy.

3. Background and Purpose

Background Information:

Schlumberger Australia Pty Ltd (Schlumberger) conducted the Otway Basin 2D Marine Seismic Survey between January to April 2020. In November 2020, Schlumberger submitted a Reg25A declaration which triggered a review of the environmental performance of this activity. A review of the information provided in the environmental performance report and the marine mammal observer reports identified that the survey interacted with a higher than anticipated number of blue whales within and outside of the Biologically Important Area (BIA). The blue whale is an endangered species listed under Part 3 of the *Environment Protection and Biodiversity Conservation Act 1999*.

The purpose of the investigation / inspection is as follows:

- (a) To ascertain, in detail, the areas in which seismic acquisition took place and the associated seismic noise footprint and to determine where these areas are in relation to detected blue whales, the blue whale foraging biologically important areas and the EP specified buffer areas.
- (b) To determine the actions undertaken by Schlumberger in response to the high abundance of blue whales and the geographical area of these blue whales and whether these actions were appropriate and in line with the in-force EP, the limitations on the EP, the actions proposed by Schlumberger in response to inspection recommendations and other relevant legislative requirements.

4. Scope

The scope of the investigation is as follows:

- (a) To gather sufficient information to ascertain compliance with elements outlined in Section 3 of this brief.
- (b) To determine the appropriate course of action, including potential enforcement action, in response to any identified potential offences.

5. Conduct investigation, including but not limited to:

- Facility inductions and an entry meeting at the regulated business premise.
- Conducting interviews with management, environment personnel, marine fauna observers and other members of the workforce (as needed).
- Investigation at the premises
- Receiving, reviewing, collecting or sighting relevant documents at the premises.
- Collating preliminary observations/findings from the investigation.

5.1. Concluding the investigation, including:

- Conducting an exit meeting to discuss and provide a written summary of the observations and findings from the investigation

Feedback on the conduct of the investigation may be provided to NOPSEMA at the meeting, or electronically via the NOPSEMA website.

6. Requirements

1. A key contact person for the visit having the authority to facilitate access to relevant personnel.
2. Access to relevant personnel which have been identified in Section 5 (above).
3. The following documentation will be requested and will need to be provided on the day of the investigation. Other documents may also be requested on the day of the investigation.
 - The full Seiche Environmental Marine Mammal Monitoring Report (dated 12/5/2020) including all Appendices A to H.
 - Bridge log for support vessel MV *No Limitation* and seismic vessel MV *Nordic Explorer*
 - All MMO sighting records for the support vessel MV *No Limitation* and the seismic vessel MV *Nordic Explorer*. Information should include:
 - Where the vessel was (latitude and longitude), when the observation was made, whether the sighting was within the buffer zone, and other relevant information including sea state, name of observer, distance to the marine mammal, species ID for marine mammal, any behavioural observations that were recorded.
 - PAM operator logs and records
 - PAM validation records
 - Full acquisition log for seismic vessel MV *Nordic Explorer* including:
 - all latitudes and longitudes of the vessel and the level of sound source at each geographical point;
 - where soft starts commenced and ended;
 - Where line run ins and outs were conducted.
 - The Blue whale behavioural disturbance buffer zone and BIA shape file that was provided to the support and seismic vessel.
 - The seismic acquisition line plan provided to the seismic vessel
 - Details of all mitigation actions taken by the support vessel MV *No Limitations* and MV *Nordic Explorer*, including:
 - Records of mitigation actions taken in response to sightings within and outside of the buffer zone
 - Any action taken by the support vessel in response to cow and calf close approach on 26 January 2020
 - Details of all night-time and low visibility protocols that were implemented

- Details of all adaptive mitigation that was implemented in response to higher number of whales than expected outside the BIA and BIA buffer zone.
- Evidence of change management process that was implemented to address the new information indicating higher than expected densities of whales outside of the BIA
- Evidence that visual marine mammal observations were undertaken continuously during daylight hours and PAM operations were maintained 24 hours a day (even when the acoustic source was shut down).
- Evidence that there was at least one MMO on the bridge of the seismic vessel and one MMO on the bridge of the support vessel at all times during daylight hours.
- Evidence of the geographical location of the support vessel in the context of the seismic vessel during acquisition
- A full copy of the following MOC's:
 - MOC # 20191214072353 (4759-23)
 - MOC #20191214034036 (4759-19)
- Records of any aerial surveys that were undertaken prior to and during the Otway Basin 2D Marine Seismic Survey.
- EP addendum compiled for MOC processes

Please be advised that NOPSEMA does not access documents on external servers.

Please do not send these documents to NOPSEMA. Relevant NOPSEMA inspectors will collect the information on the day of the investigation.