

Your Ref: RMS ID 7701  
Our Ref: REG-EP-030

[REDACTED]  
[REDACTED]  
58 Mounts Bay Road  
**Perth WA 6000**

Tuesday 12 November 2024

By submission portal: [submissions@nopsema.gov.au](mailto:submissions@nopsema.gov.au)

Dear [REDACTED],

**RE: Resubmission of the Regia MSS EP**

CGG would like to take this opportunity to thank you and your team for providing an opportunity to modify and resubmit the Regia MSS EP. We have made modifications based on your letter and advice. Due to the size of the consultation files, we have made multiple uploads through the submission portal.

The EP now includes the following documents comprising the Regia MSS EP resubmission:

- The Regia MSS EP Rev 3 – 17.4.25
- The Regia MSS EP Appendices – Rev 3 -17.4.25
- EP Submission Coversheet
- Appendix C3 – CONFIDENTIAL – Sensitive Information Report
- Appendix C4 – CONFIDENTIAL – Full Text Copies (Commercial Fishers)
- Appendix C4 – CONFIDENTIAL – Full Text Copies (Orgs)
- Appendix C4 – CONFIDENTIAL – Full Text Copies (Persons)
- Appendix C7 – CONFIDENTIAL – Sercel Technical Memo<sup>1</sup>
- OMR Response Letter and Response

The following documents previously submitted to NOPSEMA remain valid for this submission:

- Appendix C6 – Public comment report
- Public comment – Evidence of updates to the EP
- Public comment – Claims and matters register
- Public comment – All comments (Excel)

---

<sup>1</sup> This document has been provided to CGG confidentially. We are working with Sercel to remove any commercial-in-confidence content and intend on publishing this as soon as possible. It is provided to NOPSEMA confidentially at this stage.

Tracked changes were made to all documents and these have been uploaded with submission except for Appendix F2, the ALARP assessment. This document has been entirely reworked and replaced.

In your letter you encouraged CCG to contact the National Offshore Petroleum Titles Administrator regarding operations or works that have been included in the Environment Plan that may require a title. CCG has reviewed its position considering the recent case law and has clarified the scope of the petroleum activity, the titles it requires, and any activities that may occur off-title. In case our interpretation remains unclear, CCG decided to include an assessment of the environmental impacts and risks arising from these support operations. We trust that this approach overcomes any lack of clarity in our position.

### **Acoustic Monitoring Technology Trial**

Also in your letter, the findings requested information about a technology trial that CCG is undertaking prior to the Regia MSS activity. As the activity is not part of the petroleum activity, nor is it connected to or necessary for the activity. As such it is prudent for us to provide the latest information about this trial in this letter and not in the EP.

The trial of a single tethered QuietSea™ buoy is planned to occur between late April/early May and June 2025, aligning with the early stages of the Southern Right Whale utilisation of the reproduction BIA and the latter part of the Blue Whale (BW) foraging season. The buoy is planned to be deployed offshore from Logan's Beach, within Commonwealth waters, at a site with an estimated water depth of approximately 50 meters. As of the time of writing, the buoy has been shipped to Australia and is currently awaiting the finalisation of a site-specific mooring design to support secure deployment and optimal data acquisition. As previously noted, further information on the buoy as it relates to their potential use during the survey is included in Appendix C7 and provided confidentially.

### **Other Feedback**

We would like to acknowledge the value of the recent meetings with the NOPSEMA assessment team, which have provided a helpful forum for discussion and clarification of complex aspects of the Environment Plan. We particularly appreciate the attendance of senior representatives, which has contributed positively to the dialogue. However, we have observed a notable difference between the constructive nature of the verbal feedback provided during these meetings and the written feedback received. While the meetings have supported greater mutual understanding, some of the advice offered by participants less familiar with the content of the EP was general in nature and, at times, misaligned with the specific details of the submission.

Throughout the preparation of this Environment Plan, we have adopted a chronological approach to documenting our assessments and responses. This structure was selected deliberately to demonstrate the iterative nature of our analysis and the increasing depth of our evaluations over time, particularly in response to relevant persons and now regulatory queries. However, it appears that some of the deficiencies raised by the assessors relate to matters that are resolved or clarified in previous or subsequent sections of the documentation. We respectfully request that the assessment process acknowledge the deliberate chronology of the EP, as it is central to understanding the development and rationale of our methodologies and conclusions.

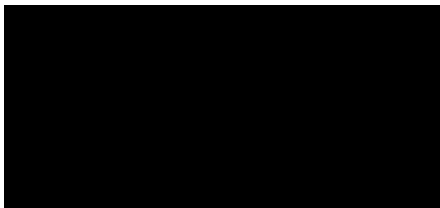
We have also noted instances where NOPSEMA feedback appears to diverge from definitions established under the Environment Regulations or overlooks the definitions we have

reasonably adopted in the absence of regulatory guidance. This has, at times, contributed to miscommunication and misalignment in the interpretation of key concepts. Our expectation is that the regulatory definitions must be strictly adhered to and that NOPSEMA will give due consideration to the definitions set out in the EP where regulation is silent. Doing so will support a more aligned and efficient assessment process and reduce the likelihood of persistent misunderstandings.

As you know, CGG have made a commitment to transparency for stakeholders throughout the NOPSEMA assessment process. As a part of this commitment, CGG intends to publish the resubmitted Environment Plan on its consultation hub website, likely after the Easter holidays. As per previous correspondence, information subject to the Privacy Act will be redacted.

CGG remains at your request if you or your assessment team would like clarification on any matters presented.

Regards,



Cc: [REDACTED]@nopsema.gov.au