

**From:** [REDACTED]  
**Sent:** Wed, 16 Jul 2025 08:19:54 +0000  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: CGG Regia MSS EP - Not reasonably satisfied - Opportunity to modify and resubmit #2 [SEC=OFFICIAL]

OFFICIAL

Hi

The paper I referred to in the meeting was Darias-O'Hara et al. (2025). Behavioural response thresholds for the assessment of noise impact on Antarctic marine mammal species, *Marine Policy*, Volume 179, 2025, 106738.

<https://www.sciencedirect.com/science/article/pii/S0308597X25001538?via%3Dihub>

The study involved an expert elicitation process for deriving behavioural response thresholds including for a low-frequency cetacean group that includes southern right whales. The experts estimated a median (50<sup>th</sup> percentile) response threshold of 139 dB re 1  $\mu$ Pa in response to seismic airguns, noting that levels on the probability distribution curve obviously include lower levels. The paper also notes that the thresholds do not consider the social complexity and sensitivities of mother-calf pairs or the most vulnerable individuals (e.g., calves), with mother-calf pairs more likely to elicit more adverse, and quicker responses to sound sources than their conspecifics.

Two other papers that may also be relevant in terms of exposure context (sound types/sound familiarity) are:

- Nowacek et al. (2004) North Atlantic right whales (*Eubalaena glacialis*) ignore ships but respond to alerting stimuli. Proc R Soc Lond Ser B Biol Sci 271(1536):227–231.  
<https://doi.org/10.1098/rspb.2003.2570>
- Castellote et al. (2012). Acoustic and behavioural changes by fin whales (*Balaenoptera physalus*) in response to shipping and airgun noise. Biol Conserv 147(1):115–122.  
<https://doi.org/10.1016/j.biocon.2011.12.021>

Kind regards,

Regulatory Operations | Geophysical Survey and Installation



## Australia's offshore energy regulator

National Offshore Petroleum Safety and Environmental Management Authority

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**From:** [REDACTED]@klarite.com.au>  
**Sent:** Wednesday, 16 July 2025 3:18 PM  
**To:** [REDACTED]@nopsema.gov.au>  
**Cc:** [REDACTED]@cgg.com>; [REDACTED]  
[REDACTED]@nopsema.gov.au>; [REDACTED]@nopsema.gov.au>  
**Subject:** Re: CGG Regia MSS EP - Not reasonably satisfied - Opportunity to modify and resubmit  
#2 [SEC=OFFICIAL]

**OFFICIAL**

Thanks [REDACTED] received and understood.

I recall that you mentioned a new paper (Darius 2025?) that you might be able to share with us? I didn't note down the specific reference so if you could send a link or the proper reference, that would be most appreciated.

Regards,

[REDACTED]

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**From:** [REDACTED]@nopsema.gov.au>  
**Sent:** Wednesday, July 16, 2025 15:08  
**To:** [REDACTED]@klarite.com.au>  
**Cc:** [REDACTED]@cgg.com>; [REDACTED]  
[REDACTED]@nopsema.gov.au>; [REDACTED]@nopsema.gov.au>  
**Subject:** RE: CGG Regia MSS EP - Not reasonably satisfied - Opportunity to modify and resubmit  
#2 [SEC=OFFICIAL]

**OFFICIAL**

Hi [REDACTED]

Thanks for following up.

We are happy for CGG to confirm a revised resubmission date and any necessary extension later than the timeframe outlined in our letter. Please provide us with a preliminary resubmission date by 31 July 2025.

Please then continue to keep us informed of progress and if there are any further requests to change the planned resubmission date, please advise us at least two weeks prior to the agreed resubmission date.

Kind regards,



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**From:** [REDACTED] [@clarite.com.au>  
\*\*Sent:\*\* Wednesday, 16 July 2025 2:39 PM  
\*\*To:\*\* \[REDACTED\] \[@nopsema.gov.au>  
\\*\\*Cc:\\*\\* \\[REDACTED\\] \\[@cgg.com>; \\\[REDACTED\\\] \\\[@nopsema.gov.au>  
\\\\*\\\\*Subject:\\\\*\\\\* Re: CGG Regia MSS EP - Not reasonably satisfied - Opportunity to modify and resubmit #2 \\\\[SEC=OFFICIAL\\\\]\\\]\\\(mailto:@nopsema.gov.au\\\)\\]\\(mailto:@cgg.com\\)\]\(mailto:@nopsema.gov.au\)](mailto:@clarite.com.au)

OFFICIAL

Good afternoon [REDACTED] [REDACTED] [REDACTED]

Thank you to you and your team for your time and advice during the meetings over the past week.

We note that NOPSEMA's letter includes a request for us to advise if an extension to the proposed resubmission timeframe is needed. Unfortunately, this timeframe lapsed last week before we were able to conclude our discussions.

Now that our meetings have concluded, we would like to request that consideration of a revised resubmission timeframe be deferred. Based on our current understanding, we expect to undertake additional sound propagation modelling, and it is likely we will require more time than the previously proposed 18 September resubmission date.

As discussed, would NOPSEMA be open to confirming a revised resubmission date and any necessary extension at a later stage? We propose to keep you informed of our progress, including any request for further advisory meetings, and formally request an extension once we are in a position to confirm both the need for it and the duration required.

Could you please confirm whether this approach is acceptable to NOPSEMA?

Regards,  
[REDACTED]

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**From:** [REDACTED] [@nopsema.gov.au>  
\*\*Sent:\*\* Friday, June 20, 2025 16:33  
\*\*To:\*\* \[REDACTED\] \[@klarite.com.au>  
\\*\\*Cc:\\*\\* \\[REDACTED\\] \\[@cg.com>; \\\[REDACTED\\\] \\\[@nopsema.gov.au>; \\\\[REDACTED\\\\] \\\\[@nopsema.gov.au>  
\\\\\*\\\\\*Subject:\\\\\*\\\\\* CGG Regia MSS EP - Not reasonably satisfied - Opportunity to modify and resubmit #2  
\\\\\[SEC=OFFICIAL\\\\\]\\\\]\\\\(mailto:@nopsema.gov.au\\\\)\\\]\\\(mailto:@nopsema.gov.au\\\)\\]\\(mailto:@cg.com\\)\]\(mailto:@klarite.com.au\)](mailto:@nopsema.gov.au)

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Dear [REDACTED]

Following NOPSEMA's assessment of the CGG Regia MSS EP (Document No.REG-EP-030-F1, Revision 3, dated April 2025), the attached letter provides notice that NOPSEMA is not reasonably satisfied that the EP meets the environment plan acceptance criteria set out in the Offshore Petroleum and Greenhouse Gas Storage (Environment) Regulations 2023. The reasons are provided in Attachment 1 of the letter.

NOPSEMA is giving CGG an opportunity to modify and resubmit the EP.

Please also find attached, advice requested by NOPSEMA from the Science Branch (marine mammal team) at the Australian Antarctic Division in DCCEEW. The scientific advice has been provided to NOPSEMA in relation to the effectiveness of acoustic detection methods for blue whales and southern right whales. The advice does not cover other considerations under the Regulations or NOPSEMA guidance that the Regia MSS EP assessment team has also taken into account during the assessment and making the conclusions outlined in the OMR letter. AAD's advice contains detail which may be relevant and useful to CGG for the purpose of evaluating the effectiveness of acoustic detection monitoring systems.

If you have any questions, please let me know.

Kind regards,



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