

EXPLORATION DRILLING IN THE ORANGE BASIN DEEP WATER LICENSE AREA OFF THE WEST COAST OF SOUTH AFRICA

COMMENTS RECEIVED FROM INTERESTED AND AFFECTED PARTIES

I&AP REGISTRATION AND RESPONSE FORMS

PROPOSED EXPLORATION WELL DRILLING PROGRAMME IN THE ORANGE BASIN DEEP WATER LICENCE AREA OFF THE WEST COAST OF SOUTH AFRICA
INTERESTED AND AFFECTED PARTY (I&AP) REGISTRATION AND RESPONSE FORM

Would you or your organisation like to become a registered I&AP and continue to receive information on the proposed project?

Yes No

Name: *Francine Dieckmann*
Designation: *Ms*

Organisation: *Private*

Postal address: *PO Box 23310, Claremont, Cape Town*
7735 Email address: *francinebtk@gmail.com*
Telephone number: *0216715315* Fax number:

Do you or your organisation have any issues or concerns regarding the proposed well drilling programme in the Orange Basin Deep Water License Area?

Yes No

If yes, please provide details below (or use extra pages if necessary):

- ① Possible spills from drilling operations*
- ② Impacts on marine fauna*
- ③ Impacts on local fisheries*
- ④ BP Gulf of Mexico oil spill → concerns about safety and re-occurrence of such incidents*

Please forward to:
NMA Effective Social Strategists (Pty) Ltd
Attention: Mfowabo Maphosa
PO BOX 32097, BRAAMFONTEIN, 2017
Tel: 011 447 9737 Fax: 086 601 0381
E-mail: mfowabom@nma.org.za



Registration and Response Forms must reach NMA Effective Social Strategists no later than **Monday 2 December 2013**

**PROPOSED EXPLORATION WELL DRILLING PROGRAMME IN THE ORANGE BASIN
DEEP WATER LICENCE AREA OFF THE WEST COAST OF SOUTH AFRICA**

INTERESTED AND AFFECTED PARTY (I&AP) REGISTRATION AND RESPONSE FORM

Would you or your organisation like to become a registered I&AP and continue to receive information on the proposed project?

Yes No

Name: GREG MARSHALL

Designation: Risk Control Manager

Organisation: SEA HARVEST CORPORATION (PTY) LTD

Postal address: P. O. Box 52

Saldanha

Email address: gregm@seaharvest.co.za

Telephone number: 022 7014186

Fax number: 022 7144239

Do you or your organisation have any issues or concerns regarding the proposed well drilling programme in the Orange Basin Deep Water License Area?

Yes No

If yes, please provide details below (or use extra pages if necessary):

depth of drill 1500t beyond our fishing area
of operation.

Please forward to:
NMA Effective Social Strategists (Pty) Ltd
Attention: Mfowabo Maphosa
PO BOX 32097, BRAAMFONTEIN, 2017
Tel: 011 447 9737 Fax: 086 601 0381
E-mail: mfowabom@nma.org.za



Registration and Response
Forms must reach NMA
Effective Social Strategists
no later than
Monday 2 December 2013

EMAILS

Mfowabo Maphosa

From: Mfowabo Maphosa
Sent: 31 October 2013 02:30 PM
To: 'Alet Fabricius'
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa
Attachments: ~WRD000.jpg; image001.jpg; image002.jpg

Dear Alet

I have added you to the I&AP database.

Best Regards
Mfowabo

From: Alet Fabricius [mailto:Alet.Fabricius@bidports.co.za]
Sent: 31 October 2013 08:01 AM
To: Mfowabo Maphosa
Subject: FW: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Good day,

Please add me to your list of I&APs for this project. My details are in my e-mail signature.

Kind regards,
Alet

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Alet Fabricius | SHEQ Manager
Tel 022 714 0212 | Fax 086 515 3816 | Cell 083 659 1850 | Alet.Fabricius@bidports.co.za



From: Wikus van der Merwe
Sent: 31 October 2013 07:28 AM
To: Alet Fabricius; Freddie Wright
Subject: FW: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

fyi

All business by Bidfreight Port Operations is undertaken strictly in accordance with its Standard Trading Terms and Conditions, a copy of which is available on request, or on the Company's website. For e-mail disclaimer, a full list of Directors and the STC, see www.bidports.co.za

Mfowabo Maphosa

From: Anschen Friedrichs [afriedrichs@sunbirdenergy.com]
Sent: 04 November 2013 12:00 PM
To: Mfowabo Maphosa
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Dear Mfowabo,

Thank you for the confirmation.

Kind regards,

Anschen Friedrichs
Public Officer



SUNBIRD ENERGY

From: Mfowabo Maphosa [mailto:MfowaboM@nma.org.za]
Sent: 04 November 2013 11:39 AM
To: Anschen Friedrichs
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Dear Anschen

I hereby confirm receipt of your email.

Best Regards
Mfowabo

From: Anschen Friedrichs [mailto:afriedrichs@sunbirdenergy.com]
Sent: 01 November 2013 09:31 AM
To: Mfowabo Maphosa
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Dear Mfowabo,

Thank you for your email and confirming that we have been identified as an I&AP.

Please note that Sunbird Energy has been confirmed as the Operator (76%) of Block 2A (Ibhubesi Gasfield) as per the Section 11 approval received during October 2013.

My Forest address will remain active for a while but could you please amend your records to reflect my Sunbird details for future communications.

Please confirm receipt of my email.

Mfowabo Maphosa

From: cindy.ross@za.atlascopco.com
Sent: 12 November 2013 11:15 AM
To: Mfowabo Maphosa
Subject: Re: Exploration Drilling by Shell in the Orange Basin

Dear Mfowabo,

Thank you for this information. Much appreciated.

Cindy Ross
External Sales Consultant

From: "Mfowabo Maphosa" [MfowaboM@mma.org.za]
Sent: 11/12/2013 10:30 AM ZET
To: Cindy Ross
Subject: RE: Exploration Drilling by Shell in the Orange Basin

Dear Cindy

The information that is available on the project at the moment is the Background Information Document which I have attached.

We have forwarded your contact details to Shell so that somebody can contact you in this regard.

Best Regards
Mfowabo

From: cindy.ross@za.atlascopco.com [mailto:cindy.ross@za.atlascopco.com]
Sent: 04 November 2013 10:01 AM
To: Mfowabo Maphosa
Subject: Fw: Exploration Drilling by Shell in the Orange Basin

Good day Sir,

Thank you for below email. Are you able to provide me with more information on this project, and in particular who would be the best contact person to speak to, to get involved in the project?

Thanking you in advance.

Best Regards,

Cindy Ross
Sales Consultant

Mfowabo Maphosa

From: Lesley-Anne Martin [les@toprope.co.za]
Sent: 05 November 2013 08:46 AM
To: Mfowabo Maphosa
Subject: RE: exploration drilling in the Orange Basin Deep Water Licence Area off the West Coast of South Africa
Attachments: image001.jpg

Thank you, much appreciated.

Kind regards,



From: Mfowabo Maphosa [mailto:MfowaboM@nma.org.za]
Sent: 05 November 2013 08:30 AM
To: Lesley-Anne Martin
Subject: RE: exploration drilling in the Orange Basin Deep Water Licence Area off the West Coast of South Africa

Good morning

I have registered Mr Bottomley as an I&AP and he will be included in all future notifications.

Best Regards
Mfowabo

From: Lesley-Anne Martin [mailto:les@toprope.co.za]
Sent: 04 November 2013 05:15 PM
To: Mfowabo Maphosa
Subject: exploration drilling in the Orange Basin Deep Water Licence Area off the West Coast of South Africa

Good Day

Our Managing Director, Mr Daniel Bottomley would like to register as an Interested Party for the above.

Please include our company in all future notifications. Our Mr Bottomley will also be attending on Monday 11th and Tuesday 12th November.

Mfowabo Maphosa

Subject: FW: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

From: Nomi Muthialu
Sent: 14 November 2013 11:59 AM
To: Julian Drew; Mfowabo Maphosa
Subject: FW: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

From: Jeremy Blood - CCA Environmental [mailto:jeremy@ccaenvironmental.co.za]
Sent: 12 November 2013 10:00
To: Nomi Muthialu; Julian Drew
Cc: Nigel.Rossouw@shell.com; jonathan@ccaenvironmental.co.za
Subject: FW: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Hi Nomi & Julian

Herewith comments from DAFF (from Deon Durholtz) for your records and inclusion into the Issues & Responses Trail.

Regards
Jeremy

From: DeonD [mailto:DeonD@daff.gov.za]
Sent: 11 November 2013 12:30 PM
To: Jeremy Blood
Cc: Wendy West; Sven Kerwath; Carl Van Der Lingen
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Hi Jeremy,

Below is a summary of the comments from Wendy West, the DAFF scientist working on the tuna pole and pelagic longline sectors – I have cc'd her on this email for further communication purposes (and also Sven Kerwath, the senior scientist dealing with those and other sectors and Carl van der Lingen, the chair of the DAFF EAF Scientific Working Group).

[Wendy, Sven and Carl: Jeremy works for CCA Environmental, the company responsible for managing and undertaking the Basic Assessment and EMPr Addendum process. Any further comments on the project can be addressed to Jeremy. I will send you all the background information document in the next email.]

Cheers

D

Summary of Wendy's comments:

Industry representatives: Tuna pole: Fresh Tuna Exporters Association (FTEA) – Steve Cameron-Dow, stevecd@rsaweb.co.za. South African Tuna Association (SATA)- Clyde Bodenham, sata@mwweb.co.za. Tuna longline: South African Tuna Longline Association (SATLA)- Don Lucas, don@comfish.co.za.

The proposed exploration well falls on the continental shelf edge region where the, mainly, swordfish longline vessels do operate. Most of the tuna pole operators are closer inshore and south at the Cape Canyon, though a few vessels operate in Namibia's waters at Vema Seamount and are encouraged to fish up the West Coast. Tuna pole may argue that the oil exploration will affect the migration patterns of albacore as they travel up the West coast on their way to Namibia.

What is the time frame for the exploration? If it is over the tuna pole season (Oct – May) that may be a problem. I would have to check the recent activity of the swordfish vessels, but they have fished in that region in the past.

Is their proposed region not Child's Bank? Swordfish are known to head to feeding grounds such as seamounts and banks and that may be an issue.

My above thoughts need to be backed up by previous studies that highlight impacts of oil drilling on migration patterns, but those are my initial thoughts.

Mfowabo Maphosa

From: Mfowabo Maphosa
Sent: 31 October 2013 03:07 PM
To: 'Elmien De Bruyn'
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa
Attachments: image001.png; image002.jpg

Good Day Elmien

I have registered Duferco Steel Processing on the I&AP database.

Regards
Mfowabo

From: Elmien De Bruyn [mailto:Elmien.DeBruyn@dsp.co.za]
Sent: 31 October 2013 01:30 PM
To: Mfowabo Maphosa
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Good day

I would hereby like to register Duferco Steel Processing (Pty) Ltd as an Interested and Affected Party to this specific EIA.

Contact persons at our side are:

Elmien de Bruyn (elmien.debruynd@dsp.co.za) – Environmental Co-ordinator
Ilze Venter (ilze.venter@dsp.co.za) – Cost and Compliance Manager
Kobus van Rensburg (kobus.vanrensburg@dsp.co.za) – Production Manager
Jan Hattingh (jan.hattingh@dsp.co.za) – Procurement Manager

Regards

ELMIEN DE BRUYN
Environmental Co-Ordinator

Duferco
Duferco Steel Processing
Tel: +27 22 709 7127
Cell: +27 83 308 5938
Fax: +27 22 709 7342

Mfowabo Maphosa

From: Mfowabo Maphosa
Sent: 05 November 2013 09:53 AM
To: 'Esther Kluge | Leapfrog'
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa
Attachments: image001.gif; image002.jpg

Good morning Esther

Thank you for confirming that two people from your office will attend the POD.

Best Regards
Mfowabo

From: Esther Kluge | Leapfrog [mailto:esther.kluge@leapfrog.co.za]
Sent: 31 October 2013 12:15 PM
To: Mfowabo Maphosa
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Good day Mfowabo,

Two people from our office will attend the POD session at Saldanha Protea Hotel on 12 November.

Regards
Esther

ESTHER KLUGE
Principal/Property Sales Consultant

C +2783 450 4541
T +2722 772 0501
F +2722 772 2239
E esther.kluge@leapfrog.co.za

leapfrog

AFRICAN COLLECTION PROPERTY AWARDS
2010

AFRICAN PROPERTY AWARDS
2011

LANGEBAAN

WWW.LEAPFROG.CO.ZA

Mfowabo Maphosa

From: Mfowabo Maphosa
Sent: 01 November 2013 12:22 PM
To: 'Francine Becker'
Subject: RE: Shell Orange Basin

Dear Francine

I have registered you as an I&AP.

Best Regards
Mfowabo

From: Francine Becker [mailto:francinebkk@gmail.com]
Sent: 01 November 2013 12:00 PM
To: Mfowabo Maphosa
Subject: Shell Orange Basin

Dear Sir/Madam
I wish to register as an interested and affected party and participate in the process.
Regards
Francine Dieckmann

Mfowabo Maphosa

From: Mfowabo Maphosa
Sent: 05 November 2013 08:52 AM
To: 'Jeremy Marillier'
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa
Attachments: image001.jpg

Good morning Jeremy

I have registered FishSA as an I&AP.

Best Regards
Mfowabo

From: Jeremy Marillier [mailto:jeremy@fishsa.org]
Sent: 04 November 2013 03:16 PM
To: Mfowabo Maphosa
Subject: FW: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Hi there

I represent FishSA the overarching umbrella industrial body for the fishing industry. We would like to register as an affected party and attend the Cape Town meeting.

Kind regards

Jeremy Marillier

Executive Director: FishSA

(021) 425 2727

079 4525349

From: South African Tuna Association [mailto:sata@mweb.co.za]
Sent: 04 November 2013 02:19 PM
To: Jeremy Marillier
Subject: FW: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Hi Jeremy

Are we on this?

Cheers

From: Mfowabo Maphosa [mailto:MfowaboM@nma.org.za]
Sent: 30 October 2013 04:37 PM
To: Clyde Bodenham
Subject: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Dear Sir / Madam

Mfowabo Maphosa

From: Mfowabo Maphosa
Sent: 01 November 2013 11:09 AM
To: 'MEK Drilling BK'
Subject: RE: Orange Basin Deep Water (DEA Ref No. 14/12/16/3/3/1/1063)

Dear Judith

I have added MEK Drilling as an I&AP.

Best Regards
Mfowabo

-----Original Message-----

From: MEK Drilling BK [mailto:admin@mekdrilling.co.za]
Sent: 01 November 2013 10:46 AM
To: Mfowabo Maphosa
Subject: Orange Basin Deep Water (DEA Ref No. 14/12/16/3/3/1/1063)
Importance: High

Dear Sir

We refer to your advert in our local newspaper " Ons Kontrei", dated November 1, 2013.

Please, register our company as an interested party in this project.

Attached are our business profile which indicates, that we are a successful drilling company and would be grateful if you register us in your database.

Regards

Judith Vermeulen
Secretary
MEK Drilling CC
TEL: (027) 219 1126
FAX: (027) 219 1759
E-Mail:admin@mekdrilling.co.za

Mfowabo Maphosa

From: Mfowabo Maphosa
Sent: 05 November 2013 11:19 AM
To: 'Noleen Green'
Subject: RE: Namibian Hake Association

Dear Noleen,

Thank you for your email. I have added the Namibian Hake Association and the Confederation of Namibian Fishing Association as IS&APs.

Best Regards
Mfowabo

From: Noleen Green [mailto:noleen.green@gmail.com]
Sent: 05 November 2013 11:01 AM
To: Mfowabo Maphosa
Subject: Re: Namibian Hake Association

Dear Mfowabo,

Thank you for your email and my apology for the late response!

Contact details for the Chairman of the Namibian Hake Association:

Mr Matti Annukwa
Mobile: +264 811293461
Office: +264 64 205595
email: empire@namibnet.com

Mr Annukwa is also "acting" chairman for the Confederation of Namibian Fishing Associations

Regards,
Noleen

Mfowabo Maphosa

From: Mfowabo Maphosa
Sent: 12 November 2013 10:39 AM
To: 'P Esposito'
Cc: Nomi Muthialu; Julian Drew
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa
Attachments: image001.jpg

Dear Mr Esposito

Thank you for your email.

We will keep you informed throughout the study and, as you are now included on the project database, Shell will continue to inform you of any new information should the proposed exploration drilling receive approval and proceed into implementation.

Best Regards
Mfowabo Maphosa

From: P Esposito [mailto:pe@imdgroup.com]
Sent: 01 November 2013 11:31 AM
To: Mfowabo Maphosa
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Dear Mfowabo Maphosa,

I am replying to your email below on behalf of IMD SA. Thank you for providing us with the background information concerning Shell's exploration drilling.

We operate, directly and through other companies of our Group (FYI, please refer to imdgroup.com) survey, exploration and mining vessels in contiguous area. Therefore, we kindly ask you to keep us informed of any development of your activities in terms e.g. of identification of the marine location and timing so that we will be able to coordinate our reciprocal transit on overlapping areas in order to ensure the highest level of safety and avoidance of any adverse impact whatsoever on our reciprocal operations.

We look forward to hearing from you in due course.

Best Regards,
Paolo Esposito

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We only print the emails we really need to

Mfowabo Maphosa

From: Mfowabo Maphosa
Sent: 01 November 2013 11:00 AM
To: 'Ngesi, Phumla'
Cc: 'mahumeled@petroleumagencyrsa.com'; 'mushwanas@petroleumagencyrsa.com'
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa
Attachments: image002.png; image003.jpg

Dear All

I have registered you on the I&APs database.

Best Regards
Mfowabo

From: Ngesi, Phumla [mailto:NgesiP@petroleumagencyrsa.com]
Sent: 01 November 2013 10:46 AM
To: Mfowabo Maphosa
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Dear Mfowabo

This serves to confirm the receipt of your correspondence. Please register the following people as I&APs:
Phumla Ngesi, Environmental Compliance Manager _ Petroleum Agency SA, 021 938 3570,
ngesip@petroleumagencyrsa.com
Dovhani Mahumele, Environmental Compliance Coordinator _ Petroleum Agency SA, 021 938 3567,
mahumeled@petroleumagencyrsa.com
Stet Mushwana, Environmental Compliance Coordinator _ Petroleum Agency SA, 021 938 3573,
mushwanas@petroleumagencyrsa.com

Please note we will review the BID and provide comments for your consideration.

Kind Regards
Phumla Ngesi | Manager Environmental Compliance | Petroleum Agency SA
T: 021 938 3570 | F: 021 910 0811 | Cell: 082 850 0274 | E: ngesip@petroleumagencyrsa.com



Mfowabo Maphosa

From: Richard Montjoie [rmontjoie@umbono.co.za]
Sent: 01 November 2013 12:48 PM
To: Mfowabo Maphosa
Cc: afriedrichs@sunbirdenergy.com.au
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Thank you kindly sir!



Richard Montjoie | Geologist
Office: +27 11 484 5005
Fax: +27 11 484 5004

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From: Mfowabo Maphosa [mailto:MfowaboM@nma.org.za]
Sent: 01 November 2013 11:04 AM
To: Richard Montjoie
Cc: afriedrichs@sunbirdenergy.com.au
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Dear Richard

I have added you to the I&APs database.

Best Regards
Mfowabo

From: Richard Montjoie [mailto:rmontjoie@umbono.co.za]
Sent: 01 November 2013 10:46 AM
To: Mfowabo Maphosa
Cc: afriedrichs@sunbirdenergy.com.au
Subject: FW: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Dear Mfowabo

Please could you register myself as an I&AP for this project, I am assisting Sunbird with the EIA process on the Ibhubesi Gas Project.

Mfowabo Maphosa

From: Shirlene Fransman [shirlenef@cederbergraad.co.za]
Sent: 06 November 2013 08:46 AM
To: Mfowabo Maphosa
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

More

Baie dankie

*Shirlene Fransman
Snr Klerk debiteure: Inkomste
Streek kantoor – Lambertsbaai
Tel: 027 432 1112
Fax: 086 501 7609*

From: Mfowabo Maphosa [mailto:MfowaboM@nma.org.za]
Sent: 05 November 2013 05:25 PM
To: Shirlene Fransman
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Dear Hilda

Please find enclosed BID in Afrikaans.

Best Regards
Mfowabo

From: Shirlene Fransman [mailto:shirlenef@cederbergraad.co.za]
Sent: 05 November 2013 04:30 PM
To: Mfowabo Maphosa
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Baie dankie

Kan u dit in Afrikaans ook epos.

Baie dankie

Hilda E Job

*Tel: 027 432 1112
Fax: 086 501 7609*

Mfowabo Maphosa

From: Mfowabo Maphosa
Sent: 31 October 2013 12:37 PM
To: 'steve@provisi.co.za'
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Dear Mr Meyer

I have removed you from the I&AP database.

Regards
Mfowabo

From: Steve Meyer [mailto:steve@provisi.co.za]
Sent: 30 October 2013 07:01 PM
To: Mfowabo Maphosa
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Hi Mfowabo

Please remove me from the list of interest parties. I do not wish to receive any further correspondence.

Kinds regards

Steve Meyer
PROVISI: ScrutinyStrategyTRACTION

cell: 083 462 5678; email: Steve@provisi.co.za; website: www.provisi.co.za; skype: StephenCarlRodneyMeyer

Mfowabo Maphosa

From: WESSA Northern Cape [wessanc@yahoo.com]
Sent: 31 October 2013 08:46 AM
To: Mfowabo Maphosa
Cc: Helena Atkinson
Subject: Re: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa
Attachments: Mfowabo

TO WHOM IT MAY CONCERN

Unlike most other Regions, the Northern Cape Region of WESSA has no staff and is run by a group of volunteers. We currently have nobody on our Committee to handle the Conservation portfolio, and pressure of work means that we are not able to attend meetings or participate in Environmental Impact Assessments at this time. Please note that a lack of response does not mean that we condone this project; it simply means that we do not have the capacity to deal with these matters.

In the interest of saving paper, trees and costs, please do not post any hardcopies or discs to us, unless specifically requested. We cannot currently deal with these and they will be destroyed.

Our fax 053 842 1433 belongs to the McGregor Museum, and should only be used under exceptional circumstances, and for single pages only. This is a communal machine, so please mark all documents clearly 'WESSA', or direct them to me by name. We prefer to communicate by e-mail.

This project also falls outside the Northern Cape Province.

Kindly contact the Western Cape Region of WESSA. Consult our website www.wessa.org.za or contact Helena Atkinson, the Regional Manager at ecoschoolswc@wessa.co.za

Please do not hesitate to contact me should you require any further information.

Suzanne Erasmus
Chairperson
WESSA (Northern Cape Region)
PO Box 316
8300 Kimberley
Tel 053 839 2717 w
Fax 053 842 1433 w
Cell 082 849 7655
wessanc@yahoo.com
<http://www.wessa.org.za>

Mfowabo Maphosa

From: Mfowabo Maphosa
Sent: 25 November 2013 03:02 PM
To: 'Trevor Nell'
Subject: RE: Exploration Drilling by Shell in the Orange Basin

Dear Mr Nell

Many thanks for your email.

When you ask is it still possible to bid on this project what are you referring to?

Shell has an exploration right for the Orange Basin Deep Water Licence Area and is currently applying for environmental authorisation to undertake exploration drilling in this area. Should Shell obtain the necessary authorisation it will undertake the exploration drilling using its own drilling ship or semi-submersible drilling rig.

What component of the project do you wish to bid for?

Best Regards
Mfowabo

From: Trevor Nell [mailto:Trevor.Nell@moore-eme.com]
Sent: 20 November 2013 05:50 PM
To: Mfowabo Maphosa
Subject: Exploration Drilling by Shell in the Orange Basin

Dear Mfowabo,

Is it still possible to bid on this project?

Kind regards,

Trevor Nell

Matrikon Moore – Europe and Middle East

Tel: +27 (0) 11 466 1673/9

Fax: +27 (0) 11 466 1618

Cell: +44 (0) 777 265 1605

www.matrikon.co.za / www.moore.co.za

Mfowabo Maphosa

From: Mfowabo Maphosa
Sent: 12 November 2013 11:59 AM
To: 'trevor@thombopetroleum.com'
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa
Attachments: image001.jpg

Dear Mr Ridley

Thank you for the email.

We will keep you informed of developments concerning this project.

Best Regards
Mfowabo

From: Trevor Ridley [mailto:trevor@thombopetroleum.com]
Sent: 31 October 2013 09:30 AM
To: Mfowabo Maphosa
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Dear Mfowabo,

Thank you for this notification, I would indeed like to remain informed of developments concerning this project.

Kind regards

Trevor Ridley

*Managing Director
Thombo Petroleum Ltd.*

Mfowabo Maphosa

From: Mfowabo Maphosa
Sent: 31 October 2013 01:31 PM
To: 'Wilna Oppel'
Subject: RE: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa
Attachments: Shell OB BID Afrikaans 25 Oct 2013 FINAL.pdf

Dear Wilna

Please find attached the BID in Afrikaans.

Best Regards
Mfowabo

-----Original Message-----

From: Wilna Oppel [mailto:woppel.dtec@gmail.com]
Sent: 31 October 2013 07:16 AM
To: Mfowabo Maphosa
Subject: Re: EIA - Exploration Drilling by Shell in the Orange Basin Deep Water License Area off the West Coast of South Africa

Hi
Please send this to me in Afrikaans if you dont mind.

Thank you

On 10/30/13, Mfowabo Maphosa <MfowaboM@nma.org.za> wrote:

> Dear Sir / Madam
>
>
>
> This email contains a letter and Background Information Document (BID)
> providing information on the proposal by Shell South Africa Upstream B.V.
> ("Shell") to undertake exploration drilling in the Orange Basin Deep
> Water Licence Area off the West Coast of South Africa and the
> opportunity to register as an Interested and Affected Party (I&AP) and
> provide initial comment.
>
>
> This letter and the BID are also available in Afrikaans and isiXhosa
> upon request.
>
>
> Hierdie brief en die Agtergrondinligtingsdokument (AID) is ook op
> versoek in Afrikaans en Xhosa beskikbaar.
>
>
> Le ncwadi noXwebhu lolwazi lweMvelaphi (BID) ziyafumaneka kanaanjalo
> ngeAfrikaans nangesiXhosa ngokwesicelo.
>

Mfowabo Maphosa

From: Gill Maasburg [gmaasburg@jmss.co.za]
Sent: 12 November 2013 02:31 PM
To: Mfowabo Maphosa
Subject: RE: FW: Proposed Exploration Drilling in the Orange Basin Deep Water License Area off the West Coast of South Africa

Good day

Thank you for the invitation below however, Japan Marine Supplies and Services are unable to send a Representative.

Kind regards

GILL MAASBURG
PA TO CHRISTIAAN KOTZE, MD
JAPAN MARINE SUPPLIES & SERVICES
TEL: +27 21 514-4507
FAX: +27 21 514-4599
gmaasburg@jmss.co.za

From: Mfowabo Maphosa [mailto:MfowaboM@nma.org.za]
Sent: 11 November 2013 04:01 PM
To: Gill Maasburg
Subject: *** SPAM ***FW: Proposed Exploration Drilling in the Orange Basin Deep Water License Area off the West Coast of South Africa

From: Mfowabo Maphosa
Sent: 11 November 2013 02:14 PM
Subject: Proposed Exploration Drilling in the Orange Basin Deep Water License Area off the West Coast of South Africa

Dear Sir / Madam

This email provides a reminder that a public open day (POD) and information-sharing meeting will be held in Saldanha tomorrow on the Proposed Exploration Drilling in the Orange Basin Deep Water License Area off the West Coast of South Africa. The public open day will take place between 14h00 and 17h30 and representatives of Shell South Africa Upstream B.V. and the environmental consultant will be present to discuss the project or any issues or concerns you may have. The information-sharing meeting will take place at 17h30 and will consist of a formal presentation on the project and the environmental impact assessment, followed by a question and answer session. Details of the public open day and information-sharing meeting are as follows:

Date:	Tuesday 12 November 2013
Location:	Saldanha
Venue:	Protea Hotel 51 Main Road, Saldanha
Time:	POD 14h00 - 17h30

Mfowabo Maphosa

From: Mfowabo Maphosa
Sent: 11 November 2013 03:23 PM
To: 'Jeremy Marillier'
Subject: RE: Proposed Exploration Drilling in the Orange Basin Deep Water License Area off the West Coast of South Africa
Attachments: Shell OB BID - English 23 Oct 2013 FINAL.pdf; image001.jpg; image002.gif; image003.png; image004.gif

Dear Jeremy

Please find attached a copy of the background information document (BID).

Best Regards
Mfowabo

From: Jeremy Marillier [mailto:jeremy@fishsa.org]
Sent: 11 November 2013 11:00 AM
To: Mfowabo Maphosa
Subject: RE: Proposed Exploration Drilling in the Orange Basin Deep Water License Area off the West Coast of South Africa

Hi Sir

Given short notice I am unable to attend, if we can have copies of presentation and EIA then I can send written comments thanks Jeremy

From: Mfowabo Maphosa [mailto:MfowaboM@nma.org.za]
Sent: 11 November 2013 10:43 AM
Subject: Proposed Exploration Drilling in the Orange Basin Deep Water License Area off the West Coast of South Africa

Dear Sir / Madam

This email provides a reminder that a public open day (POD) and information-sharing meeting will be held in Cape Town today on the Proposed Exploration Drilling in the Orange Basin Deep Water License Area off the West Coast of South Africa. The public open day will take place between 14h00 and 17h30 and representatives of Shell South Africa Upstream B.V. and the environmental consultant will be present to discuss the project or any issues or concerns you may have. The information-sharing meeting will take place at 17h30 and will consist of a formal presentation on the project and the environmental impact assessment, followed by a question and answer session. Details of the public open day and information-sharing meeting are as follows:

Date:	Monday 11 November 2013	
Location:	Cape Town	
Venue:	Granger Bay Hotel School Beach Road, Mouille Point	
Time:	POD	14h00 - 17h30
	Meeting	17h30 - 20h00

We would like to invite you to attend the public open day (POD) and/or information-sharing meeting to learn more about this important project.

Mfowabo Maphosa

From: Mfowabo Maphosa
Sent: 11 November 2013 02:03 PM
To: 'mxiphu@offshoreafrica.co.za'
Subject: RE: Proposed Exploration Drilling in the Orange Basin Deep Water License Area off the West Coast of South Africa
Attachments: ~WRD000.jpg; image001.jpg; image002.jpg; image003.jpg; image004.jpg; image005.jpg; image006.gif; image007.png; image008.gif

Dear Mr Xiphu

Thank you for confirming your attendance to the public meeting.

Regards
Mfowabo

From: Mthozami Xiphu [mailto:mxiphu@offshoreafrica.co.za]
Sent: 11 November 2013 02:00 PM
To: Mfowabo Maphosa
Subject: RE: Proposed Exploration Drilling in the Orange Basin Deep Water License Area off the West Coast of South Africa

Dear Mr Maphosa

I just wish to confirm that it is the 17h30 session that I will be able to attend, and not the 14h00.

Thanks.

Mthozami.

Mthozami R. Xiphu
Executive Chairman
Suite 604 | 6th Floor | 4 Loop Street | Cape Town 8001
T +27 21 425 8840 | C +27 82 453 6745 | T direct +27 21 425 1091
mxiphu@saoga.org.za | www.saoga.org.za



"Serving the interests of industry and members in the upstream & midstream oil & gas industry."

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Mfowabo Maphosa

From: Mfowabo Maphosa
Sent: 12 November 2013 11:16 AM
To: 'Romer, Oliver'
Cc: Nomi Muthialu; Julian Drew
Subject: RE: Proposed Exploration Drilling in the Orange Basin Deep Water License Area off the West Coast of South Africa
Attachments: image001.jpg; image002.gif; image003.png; image004.gif

Dear Mr Römer

Thank you for your email.

We have forwarded your contact details to Shell so that somebody can contact you in this regard.

Best Regards
Mfowabo Maphosa

From: Romer, Oliver [mailto:Oliver.Romer@nov.com]
Sent: 11 November 2013 12:16 PM
To: Mfowabo Maphosa
Subject: RE: Proposed Exploration Drilling in the Orange Basin Deep Water License Area off the West Coast of South Africa

Hi Mfowabo
Thank you for your reminder email.

Please can I get the necessary contact person and/or forms to register as supplier for Shell. As we are now part of National Oilwell Varco, we wish to ensure we are registered correctly.

Kindest regards,

Oliver Römer
Director
NOV Rig Solutions SSA
+27 83 647 4004

Mfowabo Maphosa

From: Mfowabo Maphosa
Sent: 11 November 2013 03:25 PM
To: 'Roland@mecs.co.za'
Cc: 'rwilliams@saoga.org.za'
Subject: RE: Proposed Exploration Drilling in the Orange Basin Deep Water License Area off the West Coast of South Africa
Attachments: Shell OB BID - English 23 Oct 2013 FINAL.pdf; image001.jpg; image002.jpg; image003.jpg

Dear Roland

Please find attached a copy of the background information document (BID).

Best Regards
Mfowabo

From: Rita Williams [mailto:rwilliams@saoga.org.za]
Sent: 11 November 2013 02:00 PM
To: 'Roland Glass'
Cc: Mfowabo Maphosa
Subject: RE: Proposed Exploration Drilling in the Orange Basin Deep Water License Area off the West Coast of South Africa

Dear Roland,
I will ask Mfowabo, (cc in) on whose behalf SAOGA has send out the email to assist you - rgds

From: Roland Glass [mailto:Roland@mecs.co.za]
Sent: 11 November 2013 01:13 PM
To: South African Oil & Gas Alliance
Subject: RE: Proposed Exploration Drilling in the Orange Basin Deep Water License Area off the West Coast of South Africa

To whom it may concern,

I am unable to attend the event at short notice. May I please have a copy of the presentations for my reference?

Regards,
Roland

From: South African Oil & Gas Alliance [mailto:info@saoga.org.za]
Sent: Monday, November 11, 2013 12:35 PM
To: Roland Glass
Subject: Proposed Exploration Drilling in the Orange Basin Deep Water License Area off the West Coast of South Africa

Mfowabo Maphosa

From: Mfowabo Maphosa
Sent: 12 November 2013 10:50 AM
To: 'Bheki Ngcobo'
Cc: 'apulfrich@piscoes.co.za'; 'rbyrnes@iemseg.com'; Nomi Muthialu; Julian Drew
Subject: RE: Orange Basin EIA
Attachments: image001.jpg

Dear Mr Ngcobo

Thank you for your email. I acknowledge receipt thereof.

We have forwarded your comments to the Shell Team and your comments will be included in the Issues and Responses Report.

Best Regards
Mfowabo Maphosa

From: Bheki Ngcobo [mailto:bheki@imdhgroup.com]
Sent: 11 November 2013 04:16 PM
To: Mfowabo Maphosa
Cc: Richard Bymes; apulfrich@piscoes.co.za
Subject: Orange Basin EIA

Dear Mfowabo

I am unfortunately un-able to attend the event but see the below email and attachment ,also pass it to the Shell Team as a matter of transparency on the issues raised by our Marine Environmentalists colleagues in Egypt.

Kind Regards
Bheki Ngcobo
Chief Executive Officer

Dear Bheki

Please find attached the review of the Orange Basin Background document, it is clear that this is not an EIA or environmental Management plan. It is a generic document outlining authorization and intentions.

There is no mention of conventions, existing systems or the resources in South Africa to deal with an oil spill. The National Oil Spill Plan was not mentioned nor was the 25 Coastal plans and even more worrying was that there was no mention of the Shell Oil spill plan or the integration with existing plans or resources.

There is a highlighted section in the Shell Background document on the capping equipment, however again no mention of MOB/Deployment or the amount and location of dispersant.

I am not saying resources and capability is not there, I am saying information and coordination is severely lacking in your country.

Please feel free to use the attached document, There is a public consultation in Cape Town today with another in Saldhana tomorrow hosted by Shell.



SECTION – 5

Consultancy Services

Document Review

Prepared By Eng Khaled El Haw
Title Consultancy Manager
Date 09/11/13

Document	Consultants
Background Document. Dated October 2013 DEA REFERENCE NO.: 14/12/16/3/3/1/1063	CCA Environmental (Pty) in association with NMA Effective Social Strategies (Pty) has been appointed by Shell to compile EMPr.



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INTRODUCTION

IEMS has reviewed the Background Information Document dated October 2013 produced by Royal Dutch Shell for the Proposed Exploration Drilling in the Orange Basin Deep Water License Area off the West Coast of South Africa. DEA REFERENCE NO.: 14/12/16/3/3/1/1063. It is understood that the Background document purpose stated in section 2 serves to;

- Inform interested and affected parties (I&APs) about the legislative processes that Shell is required to comply with;
- Provide a description of the proposed exploration well drilling operation and the Impact Assessment process; and
- Present the specialist consultants' scope of work and how I&APs can participate in the process.

The following are IEMS views on the information contained within the background Information document and are not reflective of any studies undertaken or environmental management plans either being compiled or in existence.

The following suggested consultation questions are related to the information available and should be considered in conjunction with the relevant following statements contained within this document.

S/N	Suggested Consultation Questions	Page Reference
1	What Historical Data shall be used in the EIA?	2
2	What baseline information exists and where are the gaps?	2
3	What legislative framework shall be used <ul style="list-style-type: none"> • International Conventions to be applied? • What National laws shall be used in Context? • What is the status of the National Oil Spill Contingency Plan (NOSCP)? • Is Shell oil spill contingency Plan linked to the NOSCP? 	2
4	What are the restriction placed on the marine protected areas should a shoreline response be required?	5
5	Shall an Oil Spill Response Analysis (OSRA) be conducted to determine current response status? Including the well Capping Capability in Saldanha bay?	5
6	What industry standards are being applied?	6
7	When the project parameters shall be finalized for consultation?	6
8	Shall the following considerations be unique to South Africa? <ul style="list-style-type: none"> • Environmental Impacts of Routine Activities • Air Emissions • Operational Effluent Discharge • Support Activities • Impacts on fishing • Spill of Hydrocarbons (Oil Spills) 	7- 9



1. HISTORY OF DRILLING ACTIVITIES

To put the proposed drilling program into historical context and identify potential pre-existing Impacts from oil industry activity, it is important to examine previous oil and gas operations in this area. (Or other neighboring countries within the African Continent)

2. BASELINE INFORMATION

The level of baseline economic, social and environmental information available shall determine the depth and effectiveness of the EIA. A gap analysis maybe required to determine the areas requiring further studies.

- Ports
- Tourism
- Fisheries
- Offshore Activities (Including Diamond Mining)
- Oil Spill and drill cutting Trajectory and Stochastic modeling (2D and possibly 3D)
- Benthic & metocean surveys,
- Seabird, penguin and cetacean studies

3. LEGISLATIVE FRAMEWORK

The background document relates to authorizations required when in fact there are certain international conventions and national laws that must be complied with, obtaining authorization should include adherence to the international conventions and the context of national laws. Table 3.1 and 3.2 are examples only:

Table 3.1 International Conventions and Agreements											
Prevention and Safety					Spill Response			Compensation			
Marpol Annexes					OPRC 90	OPRC HNS	CLC		Fund	HNS	Bunker
73/78	III	IV	V	VI			69	76	92	92	
√	√	√	√	√	√		√		√	√	
Description					Full Title		Status		Summary		
MARPOL 73/78					1973 Convention for the Prevention of Pollution from Ships, as modified by the Protocol of 1978		Most of the subsidiary agreements Ratified.		Considers and seeks to prevent pollution by oil, chemicals, and harmful substances in packaged form, sewage and garbage from ships.		
OPRC					International Convention on Oil Pollution Preparedness, Response and Co-operation (OPRC)		entering into force in 1995		International maritime convention establishing measures for dealing with marine oil pollution		
CLC					Civil Liability Convention				Adopted to ensure that adequate compensation is available to persons who suffer oil pollution damage resulting from casualties		

Table 3.1 International Conventions and Agreements <i>Cont.....</i>			
92 Fund	International Convention on the Establishment of an International Fund for Compensation for Oil Pollution Damage, 1992		The International Oil Pollution Compensation Fund 1992 (IOPC Fund 1992 or 1992 Fund) was established under the 1992 Fund Convention in order to provide compensation for victims who do not obtain full compensation under the 1992 Civil Liability Convention.

3.1 International Convention on Oil Pollution Preparedness, Response and Co-operation (OPRC)

Scope - The OPRC Convention applies to:

- **V of any type whatsoever** operating in the marine environment including hydrofoil boats, air-cushion vehicles, submersibles, and floating craft of any type;
- **Fixed or floating offshore installations** or structures engaged in gas or oil exploration, exploitation or production activities, or loading or unloading of oil; and
- **Sea ports and oil handling facilities** (those facilities which present a risk of an oil pollution incident, including, inter alia, sea ports, oil terminals, pipelines and other oil handling facilities).[3]

The Convention does not apply to warships, naval auxiliary or other ships owned or operated by a State and used only on government non-commercial service. However, Parties to the Convention ensure by the adoption of appropriate measures that such ships act in a manner consistent with the Convention.

3.1.1 Oil pollution emergency plans (Oil Spill Contingency Plans)

Ships are required to carry a shipboard oil pollution emergency plan, in accordance with the provisions adopted by the International Maritime Organization (IMO) for this purpose. These plans are subject, while in a port or at an offshore terminal under the jurisdiction of a Party, to inspection by officers duly authorized by that Party.

Operators of offshore units under the jurisdiction of the Parties are required to have oil pollution emergency plans, which are co-ordinated with the national system for responding to oil pollution incidents, approved in accordance with procedures established by the competent national authority.

Authorities or operators in charge of sea ports and oil handling facilities under the jurisdiction of Parties are also required to have oil pollution emergency plans or similar arrangements which are co-ordinated with the national oil pollution response system.

3.1.2 National and regional systems for preparedness and response (OPRC Requirement)

South Africa is under obligation to establish and maintain a national system for responding promptly and effectively to oil pollution incidents. The system required comprises:

- Designated competent national authority or authorities with responsibility for oil pollution preparedness and response;
- National operational contact point or points, responsible for the receipt and transmission of oil pollution reports; and
- Authority which is entitled to act on behalf of the State to request assistance or to decide to render the assistance requested.

Also, the system must include **a national contingency plan for preparedness and response** outlining the organizational relationship of the various involved bodies, public or private, taking into account guidelines developed by the IMO.[6]

In addition, South Africa, either individually or through bilateral or multilateral co-operation and in co-operation with the oil and shipping industries, port authorities and other relevant entities, has to establish:

- **A minimum level of pre-positioned oil spill combating equipment and programs for its use;**
- **A program of exercises for oil pollution response organizations and training of relevant personnel;**
- **Detailed plans and communication capabilities for responding to an oil pollution incident; and**
- **A mechanism or arrangement to co-ordinate the response to an oil pollution incident with the capabilities to mobilize the necessary resources).[7] Parties ensure that all relevant information is provided to the IMO.**

3.1.3 International co-operation in pollution response

Parties are required to co-operate and provide advisory services, technical support and equipment for the purpose of responding to an oil pollution incident upon the request of any Party affected or likely to be affected by such incident. The financing of the costs for such assistance is based on the provisions set out in the Annex to the Convention.

3.2 National Legislation

National Legislation (See Table 3.2) should also include reference to the National contingency plan for preparedness and response outlining the organizational relationship of the various involved bodies, public or private. (DEA and SAMSA)

The South African National Contingency plan is currently under revision and extensions to include spills of chemicals. 25 Local Coastal Oil Spill Contingency Plans, compiled by DEAT, detail appropriate actions to be taken upon threatened or actual impact. These are supported by a comprehensive Coastal Sensitivity Atlas. Individual plans for oil handling facilities are in place, drawn up by the oil industry, represented by the Oil Industry Environment Committee (OIEC). The cleanup of oil spills in port has been delegated to PORTNET, the ports administration. Plans are established for each port. (Source- ITOPF South Africa Country Profile)



Table 3.2 - National Legislation

Mineral and Petroleum Resources Development Act, 2002: Environmental Management Program	Requirement of obtaining an exploration right is that an EMPr must be compiled in terms of Section 39 of the MPRDA, submitted to Petroleum Agency SA (PASA) for consideration and approval by the Minister of Mineral Resources (or the delegated authority)
National Environmental Management Act, 1998: Basic Assessment	The Environmental Impact Assessment (EIA) Regulations 2010 promulgated in terms of Chapter 5 of NEMA provide for the control of certain activities that are listed in Government Notices (GN) R544 (Listing Notice 1), R545 (Listing Notice 2) and R546 (Listing Notice 3).

4. MARINE PROTECTED AREAS

South African Marine protected areas, are regions in which human activity has been placed under some restrictions in the interest of conserving the natural environment, its surrounding waters and the occupant ecosystems, and any cultural or historical resources that may require protection. The following are the marine protected areas in South Africa. The location of the MODU, the activities of the support vessels and shore side logistics shall need to consider these marine protected areas.

- Aliwal Shoal Marine Protected Area (KwaZulu-Natal)
- Betty's Bay Marine Protected Area (Western Cape)
- Bird Island Marine Protected Area (Eastern Cape)
- De Hoop Marine Protected Area (Western Cape)
- Dwesa-Cwebe Marine Protected Area (Eastern Cape)
- Goukamma Marine Protected Area (Western Cape)
- Helderber Marine Protected Area (Western Cape)
- Hluleka Marine Protected Area (Eastern Cape)
- iSimangaliso Marine Protected Area (KwaZulu-Natal)
- Jutten Island Marine Protected Area (Western Cape)
- Langebaan Lagoon Marine Protected Area (Western Cape)
- Malgas Island Marine Protected Area (Western Cape)
- Marcus Island Marine Protected Area (Western Cape)
- Pondoland Marine Protected Area (Eastern Cape)
- Robberg Marine Protected Area (Western Cape)
- Sardinia Bay Marine Protected Area (Eastern Cape)
- Sixteen Mile Beach Marine Protected Area (Western Cape)
- Stilbaai Marine Protected Area (Western Cape)
- Table Mountain Marine Protected Area (Western Cape)
- Trafalgar Marine Protected Area (Eastern Cape)
- Tsitsikamma Marine Protected Area (Eastern Cape)



5. OIL SPILL RESPONSE ANALYSIS (OSRA)

Often the EIA as well as the oil spill contingency plans outline response actions, in this regards It is recommended that an Oil Spill Response Analysis be conducted to determine that equipment, processes and procedures are in place and relevant.

The purpose of the Oil Spill Response Analysis (OSRA) is to identify what emergency preparedness systems are in place to combat an oil spill, and to evaluate whether these resources are available within acceptable response times. Based on the OSRA and conditions set in the permit to operate by the Department of Environment (DEA), an Oil Spill Contingency Plan (OSCP) must be established before the drilling commences. If an acute oil spill occurs, the established OSCP will come into force.

The OSRA is based on information available from the Operator, DEA, SAMSA, PORTNET and other oil and gas companies or organizations with area specific experience.

The purpose of oil spill response is to minimize environmental damage. Therefore, the natural resources that contribute to environmental risk must form the basis for the oil spill response. The combat strategy is primarily based on mechanical cleanup close to the source, and by establishment of more than one Response Scenario, to collect oil that passes the first tactical Response Line and to prevent stranding of oil in vulnerable sites and habitats.

To be able to use the available contingency systems most efficiently a proper system for detection and monitoring of the oil spill must be in place. The detailed plans for handling acute spills will be described in the OSCP.

Factors that affect the choice of strategy are discharge rate and amounts, weather, oil characteristics and oil spreading/weathering, as well as the presence of vulnerable environmental resources.

The following Response Options are based on the Tiered Response Concept and are considered to the extent necessary:

Response Expectations	Immediate: Combat at open sea
Response Expectations	24 Hours: Combat at open sea / Evaluate coastal response
Response Expectations	48 Hours: Protect high priority resources
Long Term Expectations	Stakeholders

The OSRA should result in discussions of response systems, barriers and expectation times, together with adequate systems for oil spill monitoring and mapping and post-spill investigations.

Consideration: - Advanced well intervention and capping equipment is available in Saldanha Bay for deployment in the event of a subsea well control incident. The subsea well intervention system includes four capping stacks to shut-in an uncontrolled subsea well and two hardware kits to clear debris and apply subsea dispersant at a wellhead.

- What are the limitations of this equipment, area preparation time, mobilization and deployment time?
- Is there sufficient dispersant available, approved and suitable back-up stock?



6. INDUSTRY STANDARDS & GUIDELINES

The International Association of Oil and Gas Producers (OGP) developed recommendations following the Macondo (Gulf of Mexico) and Montara (Australia) and other similar incidents. The recommendations are available either publicly via their website, or to members of the association. Elements of these recommendations should be referenced and utilized in the development of the operations specific Environmental Management Plan (EMP) and or EIA. <http://www.ogp.org.uk/pubs/465.pdf>

7. PROJECT DESCRIPTION

The drilling rig/ship and contractor have not been finalized at the time of writing, most operational parameters have not been fully established (actual well locations and target depths, support infrastructure, supply routes and drilling schedule).

The Background information document outlines the use of Water Based Mud (WBM) with drill cuttings and WBM being released onto the seafloor, throughout the initial drilling campaign.

Following the initial stages of drilling Synthetic Based Mud (SBM) shall be used with the drill mud returned for treatment and removal of solids, the cutting shall be treated and discharged overboard.

For overboard discharge of cuttings the permit target appears to be 6.9%, however with improved cleaning using solids control equipment a target can be achieved less than 5%.

8. CONCLUSION

The Shell Group is a de-centralized, diversified group of companies with widespread activities, and each Shell company has wide freedom of action. However what all Shell companies have in common is the Shell reputation. Upholding the Shell reputation is paramount.

It is understood that Shell shall appreciate any and all comments during the public consultation events (see table 8.1) that are practical and feasible in the proposed drilling campaign. IEMS as a Seaharvest company has compiled this document to reflect IEMS experience and to assist where practical the Shell drilling campaign together with the support IEMS can provide to interested parties.

Table 8.1 – Public Consultation

Table 8.1 – Public Consultation	
Location - Cape Town	Location - Saldanha
Date - Monday 11th November	Date - Monday 12th November
Venue – Granger Bay, Hotel School, Beach Road, Moille Point	Venue – Protea Hotel, 51 Main Road, Saldanha Bay
Time (Public Open Day) 14:00 – 17:30	Time (Public Open Day) 14:00 – 17:30
Time (Information Sharing Meeting) 17:30 – 20:00	Time (Information Sharing Meeting) 17:30 – 20:00

IEMS accepts no liability or responsibility whatsoever for the information contained herein with respect to any use of or reliance upon this information by any third party.



LIKELY KEY IMPACTS	MITIGATION MEASURES	SIGNIFICANCE OF IMPACT
1.0 Environmental Impacts of Routine Activities Physical damage to benthic communities due to placement of drilling unit 2.0 Air Emissions Impacts on air quality and release of greenhouses gases.	<ul style="list-style-type: none"> Any mitigation required shall depend on type of drilling unit. Rig and vessels must comply with MARPOL Annex VI, which sets limits on sulphur dioxide and nitrogen oxide emissions from exhausts and prohibits deliberate emissions of ozone depleting substances. Routine inspection and maintenance of engines, generators and other equipment to minimize air emission Use of low-sulphur diesel if available locally 	<ul style="list-style-type: none"> To be determined in EIA
3.0 Operational Effluent Discharge Impacts on Water quality near the MODUs	<ul style="list-style-type: none"> All discharges from the MODUs and supporting vessels should be treated and discharged in accordance with the MARPOL convention Compliance with project effluent guidelines including oil and grease. 	<ul style="list-style-type: none"> To be determined in EIA
4.0 Solid Waste Wastes will include hazardous and non-hazardous wastes.	<ul style="list-style-type: none"> Shell should develop a drilling waste management plan addressing requirement for waste segregation to facilitate appropriate onshore treatment and/or disposal. As far as reasonably practicable, all material brought ashore will be sent for re-cycle, re-use or properly disposed of. 	<ul style="list-style-type: none"> To be determined in EIA



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5.0 Support Activities		
<p>Helicopters flying over Important Bird Areas could disturb coastal bird population. There is also a potential for support vessel striking a marine mammal or sea turtle and minor behavioral disturbance of marine mammals, turtles and birds could be expected</p>	<ul style="list-style-type: none"> Helicopters flying from Klentzee should avoid flying over the wetlands IBA. If avoidance is not possible a minimum agreed altitude should be maintained when flying over this area to minimize disturbance Inform Authorities at Saldhana Bay and or Cape Town in advance of the nature of services that will be required for service provision 	<ul style="list-style-type: none"> To be determined in EIA
<p>Increased strain on service provisions Onshore support base will require electricity, water and waste disposal services</p>	<ul style="list-style-type: none"> Inform Authorities at Saldhana Bay and or Cape Town in advance of the nature of services that will be required for service provision 	<ul style="list-style-type: none"> To be determined in EIA
6.0 Impacts on fishing		
<ul style="list-style-type: none"> Exclusion zone for the MODU's may disrupt fishing activities in the vicinity Operational discharges may affect fishing activities 	<ul style="list-style-type: none"> Establish clear communication channels with commercial deep-sea fishers and artisanal fishing villages. Inform port authorities and commercial fishing operations in advance of location and schedule of project activities. Treat all effluents according to MARPOL standards prior to discharge 	<ul style="list-style-type: none"> To be determined in EIA
7.0 Spill of Hydrocarbons (Oil Spills)		
<p>Potential catastrophic impacts on marine fauna and flora, seabirds, coastal waters and users of marine resources from blow-out or hydrocarbon spill</p>	<ul style="list-style-type: none"> Shell must prepare an Oil Spill Contingency Plan in line with the South African National oil spill contingency Plan, Response Equipment such as Vessels, skimmers and booms checked, listed and maintained. The MODU and support vessels must have Shipboard Oil Pollution Emergency Plans (SOP) as required under the MARPOL Convention and materials to handle spills onboard (eg. adsorbents, approved containers for storage and shipment of spill wasters, disposable bags, gloves/goggles etc). 	<p><i>Note * Small spills may occur during bunkering. Provided they are cleaned up efficiently, they will pose little threat to marine life. Larger spills although extremely rare, would pose a progressively more severe impact on the marine and coastal environment. The magnitude would be determined by the efficiency of cleanup operations.</i></p>