



BENNETT RESOURCES

## Bennett Resources Pty Ltd

### Odin 2D Seismic Survey Oil Spill Contingency Plan

[BNR\_HSE\_MP\_012]

| VERSION HISTORY |                  |        |            |                                                                    |
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## Acronyms / abbreviation

| Terms/acronym | Definition / expansion                                                   |
|---------------|--------------------------------------------------------------------------|
| BME           | Black Mountain Exploration Pty Ltd                                       |
| BNR           | Bennett Resources Pty Ltd                                                |
| CMD           | Crisis Management Director                                               |
| CMT           | Crisis Management Team                                                   |
| COO           | Chief Operations Officer – Bennett Resources                             |
| DBCA          | Department of Biodiversity, Conservation and Attractions                 |
| DCP           | Dry Chemical Portable                                                    |
| DFES          | Department of Fire and Emergency Services                                |
| DEMIRS        | Department of Energy, Mines, Industry Regulation and Safety              |
| DWER          | Department of Water and Environmental Regulation                         |
| EAP           | Employee assistance Provider                                             |
| EMS           | Emergency Management System                                              |
| EP            | Environment Plan                                                         |
| EP 371        | Exploration Permit 371                                                   |
| ESA           | Environmental Sensitive Area                                             |
| FA            | First Aid Injury / Illness                                               |
| HERG          | Hazardous Emergency Response Guide                                       |
| HSE           | Health, Safety and Environment                                           |
| IC            | Incident Controller                                                      |
| IMR           | Incident Management Room                                                 |
| IMT           | Incident Management Team                                                 |
| LTI           | Lost Time Injury                                                         |
| MTI           | Medically Treated Injury / Illness                                       |
| NATA          | National Association of Testing Authorities                              |
| OSC           | On-Scene Commander                                                       |
| OSCP          | Oil Spill Contingency Plan                                               |
| PIC           | Person in Charge                                                         |
| PGER(E)R      | Petroleum and Geothermal Energy Resources (Environment) Regulations 2012 |

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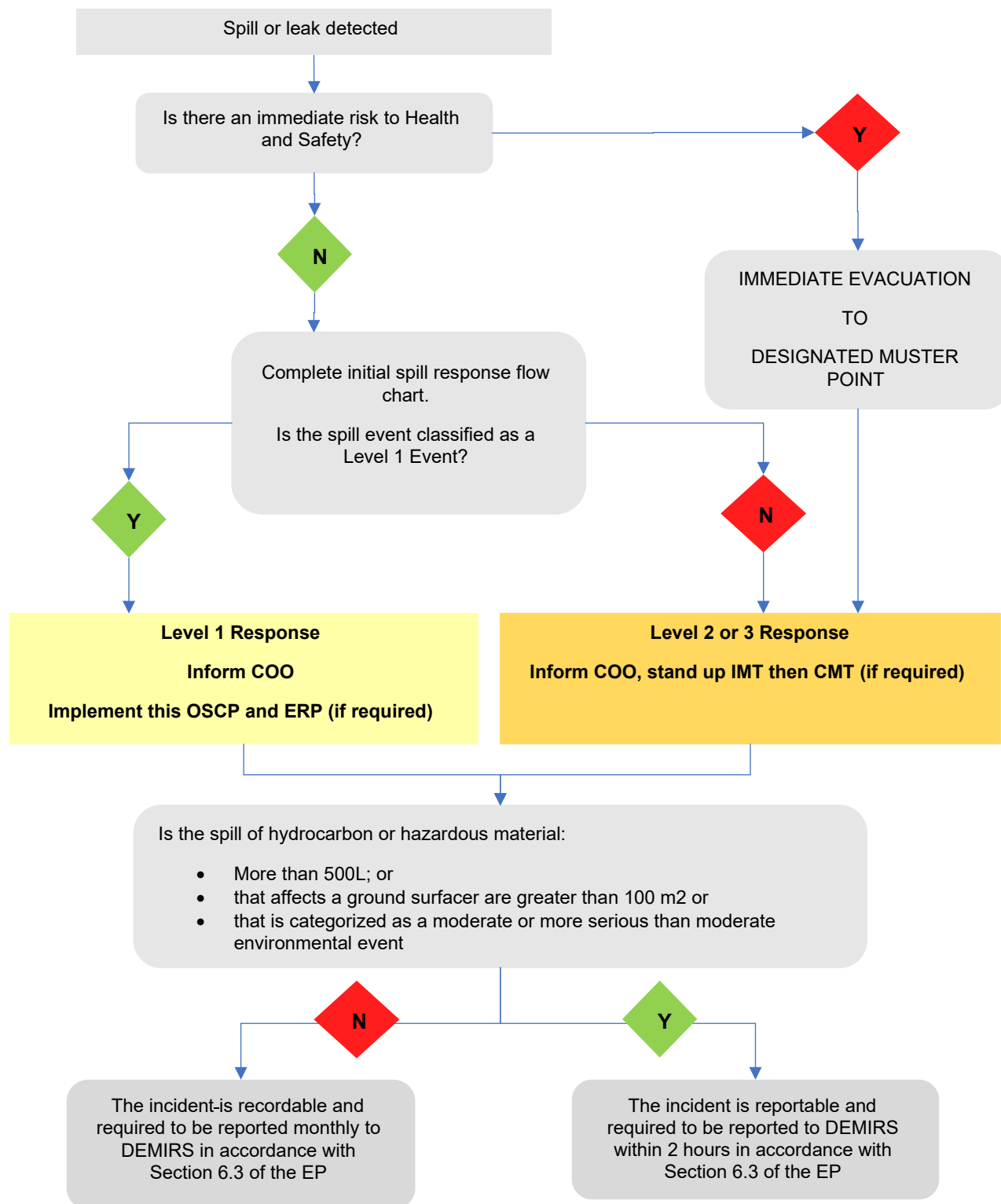


| Terms/acronym | Definition / expansion        |
|---------------|-------------------------------|
| PPE           | Personal Protection Equipment |
| SDS           | Safety Data Sheet             |
| SES           | State Emergency Service       |
| SRT           | Site Response Team            |
| UN Number     | United Nations number         |
| WA            | Western Australia             |
| ZPI           | Zone of Potential Impact      |



# 1 Immediate Response

## 1.1 Spill Response Flow Chart



## 1.2 Initial Spill Response Checklist

| *Uncontrolled in Hardcopy Format* Printed: 20-Aug-24 Use Latest Revision |                 |                  |            |           |                 |  |  |
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**Safety of Personnel**

Upon identifying a spill, firstly ensure your own safety and that of other personnel in the area. ☐

Account for all personnel. Muster upwind of the spill area. ☐

Immediately Contact Operations Manager or Project Manager. ☐

**Spill Identification and Assessment**

Identify the spilled substance and any potential health & safety hazards by checking the following:

- UN Number, or product labels on containers
- SDS
- Placards at storage location or any other relevant signage around the area.

Assess if the spill can be contained with onsite resources and equipment, including:

- if there are any immediate dangers present (ignition points, exposures)
- estimating the volume and properties of the spill (size of container)
- assessing the spill flow direction and spill dispersal velocity (gradient)
- assessing other external or environmental factors which may influence the spill response (rain, wind)
- determining if appropriate Personal Protection Equipment (PPE), equipment / machinery and personnel are available onsite.

**Assess the Spill Potential**

A. Can the substance be safely identified?

YES / NO

B. Can the spill be isolated and contained, only if safe to do so?

YES / NO

C. Is the spill event classified as an emergency Level 1?

YES / NO

Yes to A and B and C above:

**Level 1 Spill Response**

No to A or B or C above:

**Level 2 / 3 Spill Response**

| Preparation                                                                                                                                                                                                                                          | Check | Communicate                                                                                                                                                                  | Check |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| Mobilise available and trained on-site personnel to contain the spill.                                                                                                                                                                               |       | Contact the Supervisor or PIC immediately.<br>Evacuate to a designated muster point or safe location up wind.                                                                |       |
| Ensure all personnel have appropriate PPE. Refer to SDS or Hazardous Emergency Response Guide (HERG) for more information.                                                                                                                           |       | Call Emergency Services on 000 or 112 if there is an immediate threat of fire or to health and safety.                                                                       |       |
| If the incident is reportable ensure verbal or written notification to DEMIRS is provided within two hours of the incident or as soon as practicable (written is preferred).                                                                         |       | If the incident is reportable ensure verbal or written notification to DEMIRS is provided within two hours of the incident or as soon as practicable (written is preferred). |       |
| Control                                                                                                                                                                                                                                              | Check | Monitor                                                                                                                                                                      | Check |
| Ensure ignition sources are isolated, including pushing any vehicles out of the way.                                                                                                                                                                 |       | Await additional personnel and resources.                                                                                                                                    |       |
| Control the source of the spill by: <ul style="list-style-type: none"> <li>• Isolate any valves or equipment that could intensify the spill</li> <li>• plug punctured containers/tankers.</li> </ul>                                                 |       | Isolate any valves or equipment that may be an ignition source, if safe to do so.<br>Await further direction from the On-Scene Commander (OSC) and Incident Controller (IC). |       |
| Contain                                                                                                                                                                                                                                              | Check | Reassess                                                                                                                                                                     | Check |
| Containment Priorities: <ul style="list-style-type: none"> <li>• Prevent the spill entering waterways</li> <li>• Prevent further spread of the spill onto the ground</li> <li>• Isolate hazardous substance spills from other substances.</li> </ul> |       | Reassess situation and maintain communication with the Site Response Team (SRT) and Emergency Services as required.                                                          |       |



### 1.3 Emergency Contact List

| Contact                                                              | Number                                                                                                        |
|----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
| BNR COO                                                              | (08) 9200 1685                                                                                                |
| BNR Perth Office Administration                                      | (08) 9200 1685 / <a href="mailto:perthoffice@bennettresources.com.au">perthoffice@bennettresources.com.au</a> |
| BNR HSE Lead                                                         | (08) 6370 5218 / 0407 876 135                                                                                 |
| BNR Incident Control Room                                            | (08) 6370 5213                                                                                                |
| <b>Emergency Services</b>                                            | <b>000 / 112</b>                                                                                              |
| State Emergency Services (Emergencies)                               | 132 500                                                                                                       |
| Broome Fire & Rescue Service (Volunteer)                             | (08) 9192 1393                                                                                                |
| Derby Fire & Rescue Service (Volunteer)                              | (08) 9193 1194                                                                                                |
| Fitzroy Crossing (DFES/SES)                                          | (08) 9191 5163 or 0407 915 066                                                                                |
| WA Police: Fitzroy Crossing                                          | (08) 9163 9555                                                                                                |
| <b>Ambulance &amp; Hospital</b>                                      | <b>000</b>                                                                                                    |
| Noonkanbah Nurse Led Clinic & Ambulance                              | (08) 9191 4663                                                                                                |
| Royal Flying Doctors                                                 | 1800 625 800 / (08) 9417 6389 (Sat phone)                                                                     |
| Broome Hospital                                                      | (08) 9194 2222                                                                                                |
| Derby Hospital                                                       | (08) 9193 3333                                                                                                |
| Fitzroy Crossing Hospital                                            | (08) 9166 1777                                                                                                |
| <b>Information</b>                                                   |                                                                                                               |
| Poisons Information Centre                                           | 13 11 26                                                                                                      |
| Employee Assistance Provider (EAP) Lifeskills                        | 1800 870 080                                                                                                  |
| Lifeline Australia                                                   | 13 11 14                                                                                                      |
| <b>Civil Contractor</b>                                              |                                                                                                               |
| Owen Finger                                                          | 0409 290 713                                                                                                  |
| <b>Shire</b>                                                         |                                                                                                               |
| Shire of Derby-West Kimberly                                         | (08) 9191 0999                                                                                                |
| <b>Regulators</b>                                                    |                                                                                                               |
| Department of Energy, Mines, Industry Regulation and Safety (DEMIRS) | <a href="mailto:petroleum.environment@dmirs.wa.gov.au">petroleum.environment@dmirs.wa.gov.au</a>              |



|                                                                 |                                |
|-----------------------------------------------------------------|--------------------------------|
| Department of Water and Environmental Regulation (DWER)         | 1300 784 782 (24 hr service)   |
| <b>Pastoral Station</b>                                         |                                |
| Quanbun Station                                                 | (08) 9191 4750                 |
| Noonkanbah Station                                              | (08) 9191 7564 / 0438 732 755  |
| Blina Station                                                   | (08) 9191 4759                 |
| <b>Waste Management</b>                                         |                                |
| Toxfree (Broome)                                                | (08) 9194 5200                 |
| Toxfree (Derby)                                                 | (08) 9161 6400                 |
| <b>Affected Wildlife</b>                                        |                                |
| Department of Biodiversity, Conservation and Attractions (DBCA) | (08) 9474 9055 (24 hr service) |
| Wildcare Helpline                                               |                                |
| Broome Veterinary Hospital                                      | (08) 9192 1319                 |



## 2 Introduction

### 2.1 Background

Bennett Resources Pty Ltd (BNR), known here as the Company, has developed this Oil Spill Contingency Plan (OSCP) as part of the Company's implementation strategy for the prevention, preparedness, response and recovery of an unplanned hydrocarbon or hazardous substance spill that has occurred as a result of seismic survey activities (Activities) conducted under the Odin 2D Seismic Survey Environment Plan (the EP) (BNR\_HSE\_MP\_010).

### 2.2 Scope

This OSCP will be implemented should an accidental hydrocarbon or hazardous substance spill occur as a result of Activities conducted under the EP.

### 2.3 Geographical Area

Activities covered by this OSCP are located within the Exploration Permit EP 371. Specifically, the petroleum activities as described in Section 2 of the EP (BNR\_HSE\_MP\_010) are located entirely within the defined Operational Area (Figure 2-1).

### 2.4 Description of the Environment

The description of the environment within the Operational Area is contained within Section 3 of the EP (BNR\_HSE\_MP\_010), thus is not duplicated in here. It is expected that most spills would be contained within the Operational Area, and no spill would result in vegetation adjacent to the sites being exposed.

The Operational Area is located within a Pastoral Station comprised of native vegetation that is well represented. As identified in the EP (BNR\_HSE\_MP\_010) there are no Environmentally Sensitive Areas (ESAs) that occur within the Operational Area (Figure 2-2).

### 2.5 Description of the Activity

The description of the activities is contained within Section 2 of the EP (BNR\_HSE\_MP\_010) and thus have not been duplicated here.

### 2.6 Associated Documents

Specific actions taken and response options employed will be dependent on the specifics of an incident and will, ultimately, be determined by the Incident Management Team (IMT). This OSCP should be used as part of the Emergency Management System, that is comprised of several key documents (Figure 2-3), including the Crisis Management Plan (BME\_HSE\_MP\_001), Incident Management Plan (BNR\_HSE\_MP\_003) and the Emergency Response Procedure (BNR\_HSE\_PR\_001).

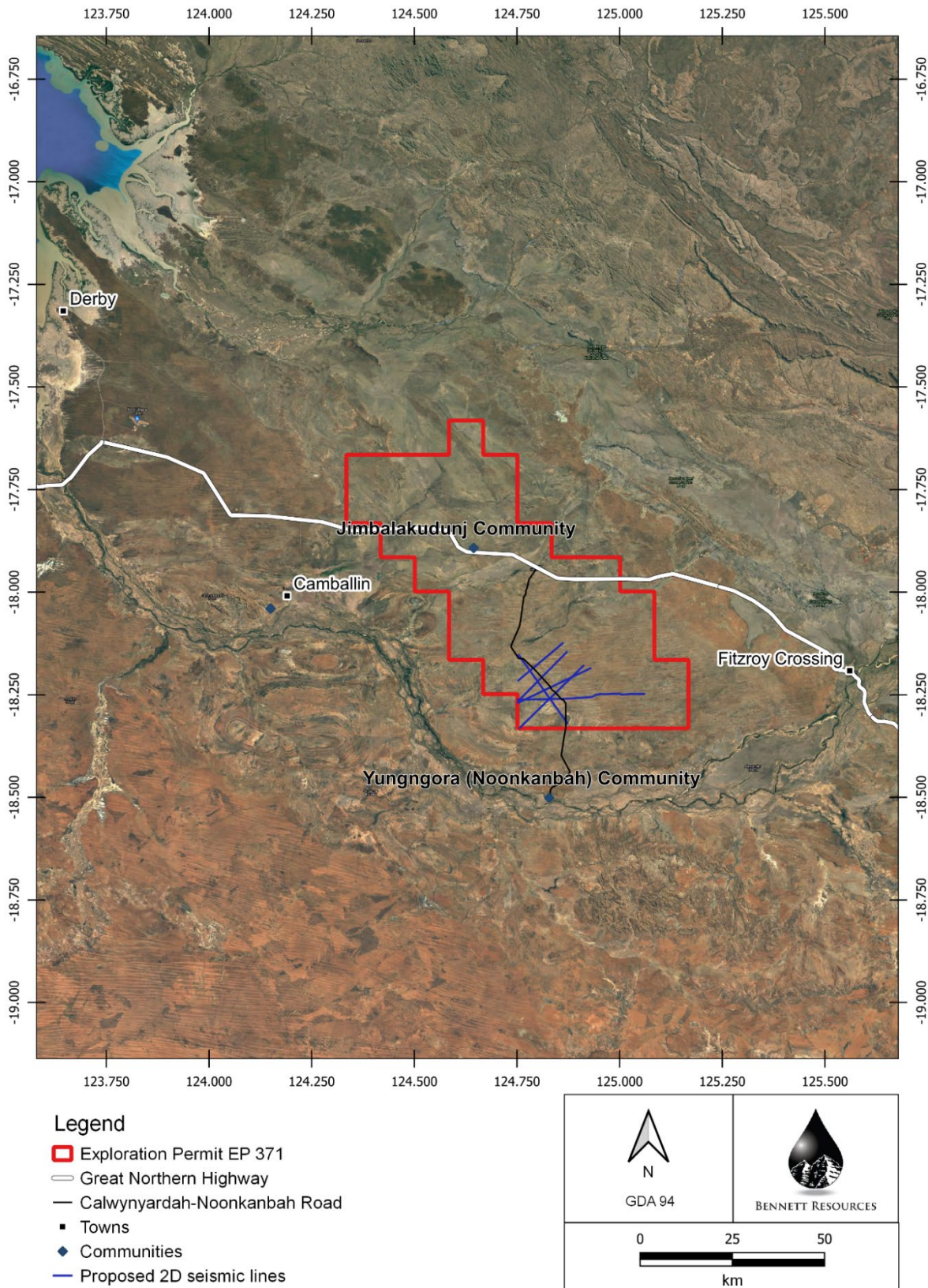
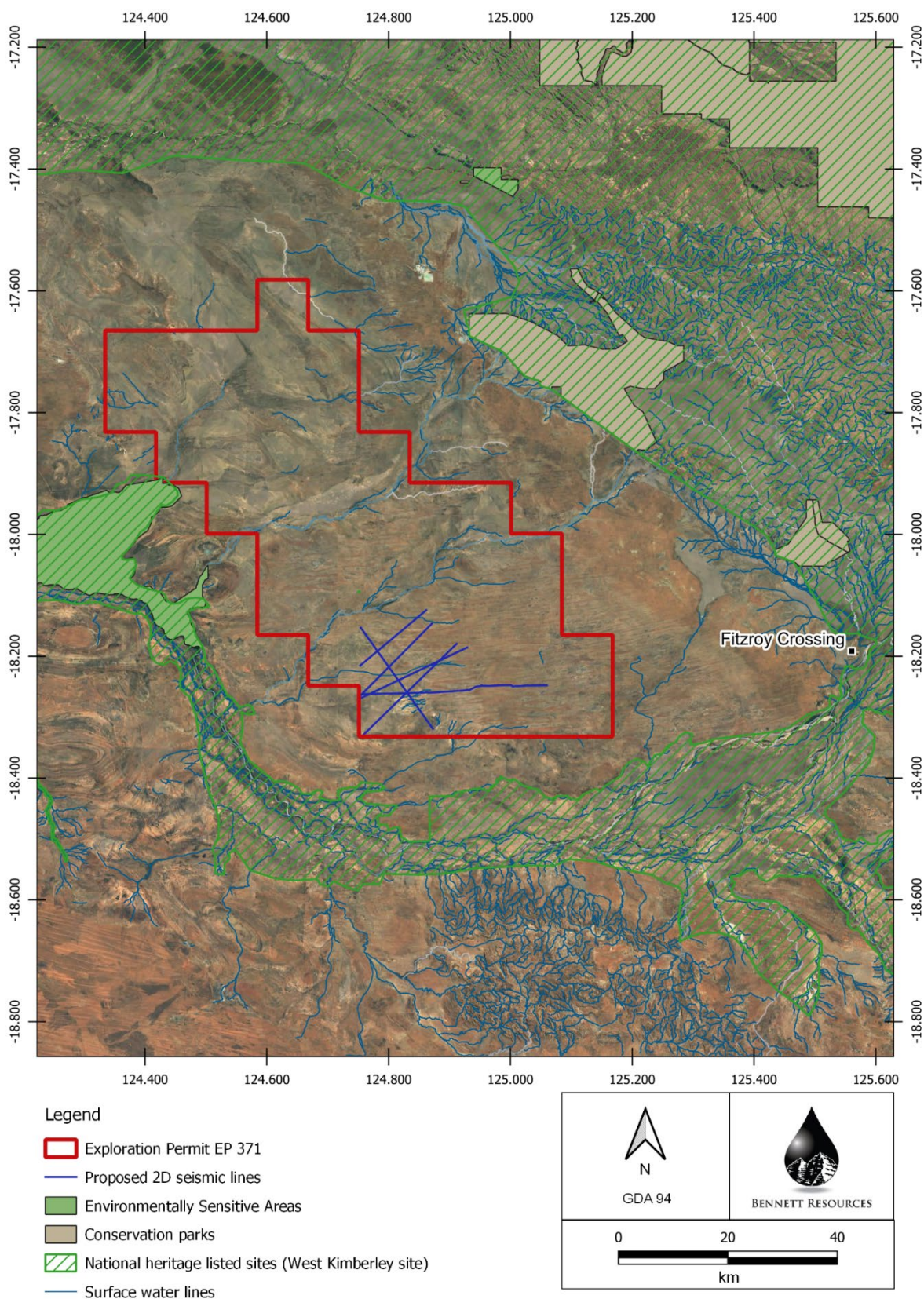


Figure 2-1: Operational Area

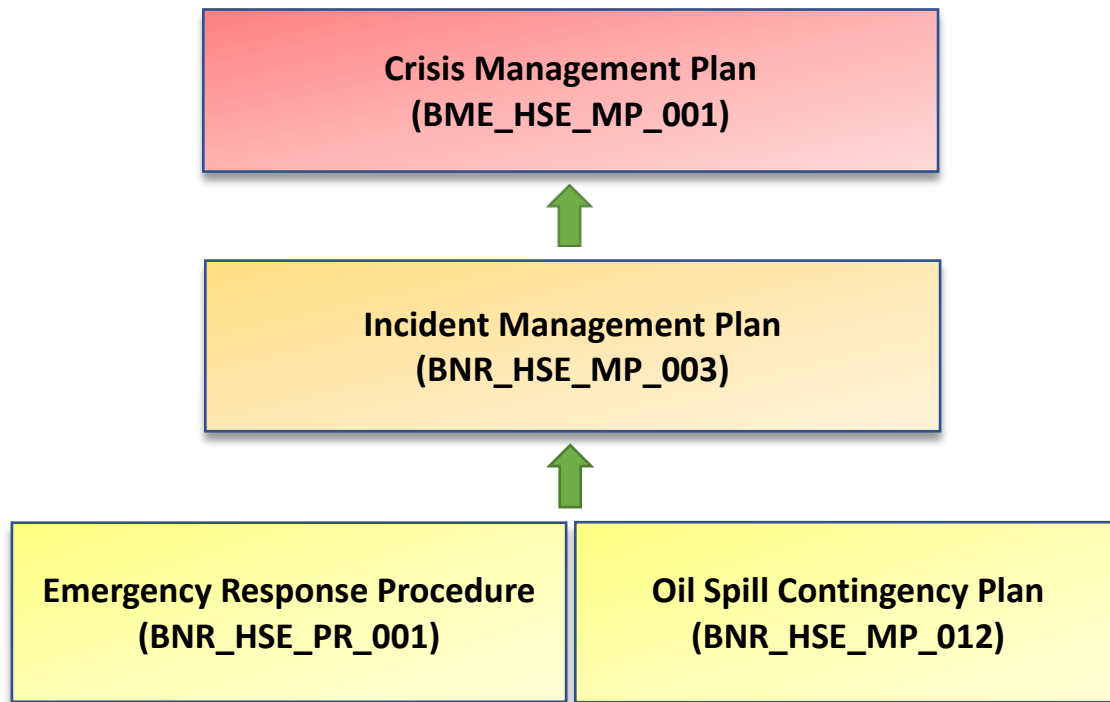
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**Figure 2-2: Environmentally Sensitive Areas and Environmental Values around EP 371**

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**Figure 2-3: Emergency Management Structure**

## 2.7 Document Review

Due to the nature of the Activities, the Company are unlikely to require the OSCP to be in place for a period exceeding 2.5 years. However, in accordance with the Regulations, this OSCP will be reviewed when:

- the OSCP has been approved for a period of 2.5 years
- there is a significant change to the operations to which this OSCP relates
- there is a change to the operator of the activity.

Specifically, the OSCP will be resubmitted to DEMIRS for assessment at least 14 days before the end of the period of 2.5 years; noting that the 2.5-year period commences the day on which the EP is first approved, or the day on which a revision of the EP is approved. Any change to this document will be in accordance with the Management of Change Plan (BNR\_MGT\_MP\_002) and subject to re-submission and regulatory approval.

## 2.8 Purpose

The purpose of this OSCP is to provide a practical guide for personnel response to an accidental hydrocarbon or hazardous substance spill, as a result of Activities covered in the EP. The Company's key priorities and objectives during a spill response include, but are not limited to:

- People - Preserve safety of all people in the immediate area, including yourself
- Environment - Minimise adverse effects to the environment
- Property - Protect the Company's assets. Stabilise the situation to prevent the event from worsening
- Business – Ensure business continuity, including reputation.

This OSCP has been developed in accordance with the *Petroleum and Geothermal Energy Resources (Environment) Regulations 2012* (PGER(E)R) and the Department of Mines, Industry Regulations and Safety (DMIRS now DEMIRS) Guideline for the Development of an Onshore Oil Spill Contingency Plan 2016.

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### 3 Credible Spill Scenarios

#### 3.1 Spill Scenarios

Potential accidental release of hydrocarbons or hazardous substances identified in the EP include:

- loss of minor volumes of hydrocarbon or hazardous materials equipment and material storage and handling
- loss of diesel from fuel tank
- loss of diesel from mobile service truck.

#### 3.2 Spill Volumes

An estimation of the maximum potential volumes for a spill and the source of those spills associated with an accidental release of hydrocarbons or hazardous substances during Activities are provided in Table 3-1 below.

**Table 3-1: Maximum potential volumes and spill sources associated with the Activities**

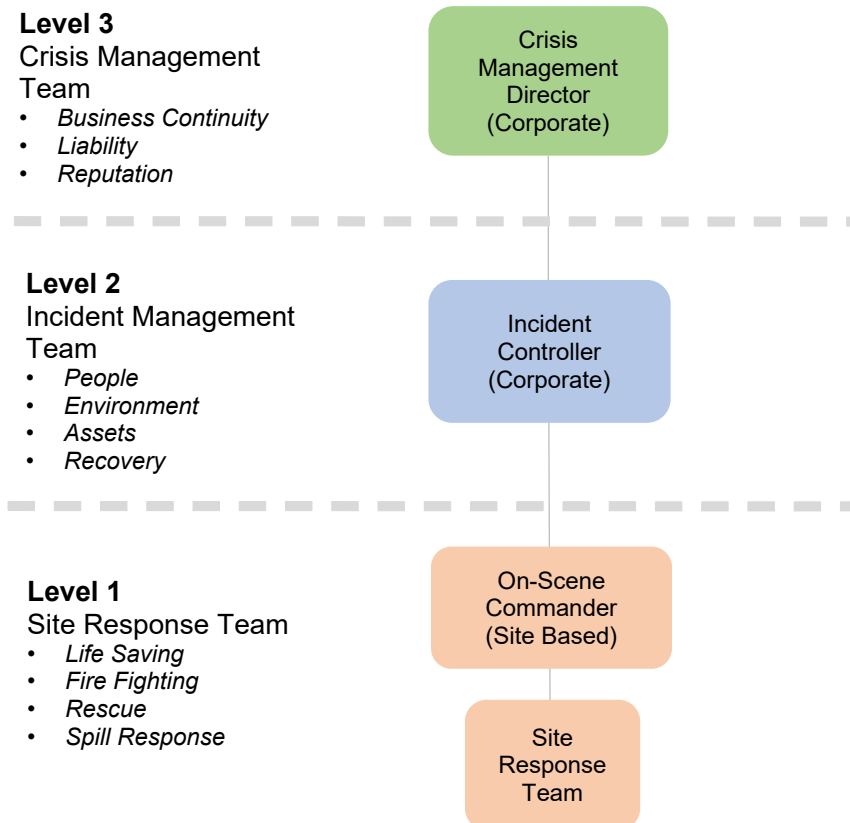
| Purpose                                            | Stored Product                    | Storage Type                            | Properties                                                                                                                                                                 | Volume | Zone of Potential Impact                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------------------------------------------|-----------------------------------|-----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Minor volumes of hydrocarbon / hazardous materials | Hydrocarbon / hazardous materials | Equipment, material storage or handling | Likely comprised of hydraulic oil, motor oil etc.                                                                                                                          | 20 L   | Given the nature of this release, a ZPI was not generated with the expectation that any release of this volume would result in a localised area of impact.                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Vehicle fuel tank                                  | Diesel                            | Fuel Tank                               | Flammable. Low viscosity. Relatively high volatility (i.e., majority will evaporate), less dense than water and low solubility in water. Large volumes may penetrate soil. | 70 L   | The soil within the Operation Area is comprised of with self-mulching cracking clays, Red deep sands, Red sandy earths, and Red / brown non-cracking clays (Section 3.2.1 of EP). Based upon Grimaz et al. (2008), it is anticipated that a large diesel release of 2 m <sup>3</sup> could result in an area in the order of 1040 m <sup>2</sup> being contaminated where site containment and recovery was not in place. Based upon the viscosity of diesel and assuming such a large area is contaminated, there is the potential that hydrocarbons may seep through to a depth of 0.24 m. |
| Service Trailer / Truck                            | Diesel                            | Fuel Tank                               |                                                                                                                                                                            | 2000 L |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |



## 4 Oil Spill Response Preparedness

### 4.1 Tiered Response to Credible Oil Spill Scenarios

The Company's EMS has three levels of incident response (Figure 4-1 and Table 4-1).



**Figure 4-1: Emergency Management System**

**Table 4-1: Emergency level**

| Emergency Level              | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Level 1: Site Response       | <p>Emergency response is to be led by the Operations Manager or Project Manager, acting as the On Scene Commander (OSC)</p> <ul style="list-style-type: none"> <li>• As per the Company's Emergency Response Procedure (BNR_HSE_PR_001)</li> <li>• First aid responders with access to first aid kits and equipment to provide basic medical aid on site.</li> </ul>                                                                                                                                                                                                                                                                               |
| Level 2: Incident Management | <p>The Company's Incident Management Team (IMT) and Incident Commander (IC), usually the COO or delegate, will operate from the Incident Management Room (IMR) located at the Company Corporate Office in Perth.</p> <ul style="list-style-type: none"> <li>• As per the Incident Management Plan (BNR_HSE_MP_003)</li> <li>• Provide technical, logistic and support services to the OSC and first responders, including technical specialist advice from BME Engineering Team in Fort Worth</li> <li>• Develop tactical plans and identify strategic issues arising from the event to control any emergency or business interruption.</li> </ul> |
| Level 3: Crisis Management   | <p>The Company Crisis Management Team (CMT) and Crisis Management Director (CMD), usually the Chief Operations Officer (COO), may also operate from the Company Corporate Office or via teleconference.</p> <ul style="list-style-type: none"> <li>• As per the Crisis Management Plan (BME_HSE_MP_001)</li> <li>• Activate CMT in consultation with the IC to respond to a major crisis on site</li> </ul>                                                                                                                                                                                                                                        |

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|  | <ul style="list-style-type: none"> <li>Focus on strategic issues, which may affect the company's future operability, profitability, and reputation.</li> </ul> |
|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------|

## 4.2 Response Escalation

Thresholds for activating all or part of the emergency and crisis management system are shown in Table 4-2. Escalation of the incident from Level 1 to Level 2 is by consultation with the OSC and IC. Only the COO or an appointed delegate, can formally declare a crisis, or direct that the company act as if in crisis and requiring abnormal situation management.

**Table 4-2: Spill Response Thresholds.**

| Activation Required      | Health and Safety                                                                                                                                                           | Environment                                                                                                                                                                                                                                                                                                                    | Business Interruption                                                                                                                                                                                                               |
|--------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Business as Usual</b> | <ul style="list-style-type: none"> <li>Incident requiring no site evacuation</li> <li>Spill can be identified.</li> </ul>                                                   | <ul style="list-style-type: none"> <li>Negligible and reversible impact</li> <li>Immediate containment and control</li> <li>Impact confined to small area.</li> <li>Volume &lt;100 L</li> </ul>                                                                                                                                | <ul style="list-style-type: none"> <li>Superficial damage / failure of equipment</li> <li>No impacts to Community (traditional owners, community and / or pastoralists.</li> </ul>                                                  |
| <b>Level 1 Response</b>  | <ul style="list-style-type: none"> <li>Incident controlled on site with site personnel</li> <li>Spill can be identified.</li> </ul>                                         | <ul style="list-style-type: none"> <li>Environmental disturbance contained within well pad operational areas</li> <li>Rapid clean-up by site personnel</li> <li>No impacts on native flora or fauna.</li> <li>Volume released &lt;1000 L</li> </ul>                                                                            | <ul style="list-style-type: none"> <li>Minor damage / failure of equipment</li> <li>Accidental damage to a heritage site not previously identified</li> <li>Minor community impacts / formal complaint.</li> </ul>                  |
| <b>Level 2 Response</b>  | <ul style="list-style-type: none"> <li>Spill may require external resources to control and contain</li> <li>Hazardous substance spill that cannot be identified.</li> </ul> | <ul style="list-style-type: none"> <li>External resources required for clean-up and remediation</li> <li>Environmental disturbance contained within well pad operational areas</li> <li>Minor impact on surrounding native flora / fauna.</li> <li>Volume released &gt;1000 L</li> </ul>                                       | <ul style="list-style-type: none"> <li>Moderate damage / failure of equipment affecting production</li> <li>Damage to community reputation and engagement</li> <li>State Regulator attention.</li> </ul>                            |
| <b>Level 3 Response</b>  | <ul style="list-style-type: none"> <li>Incident requiring external resources for control and contain</li> <li>Site evacuation required.</li> </ul>                          | <ul style="list-style-type: none"> <li>Requiring significant site and external resources for clean-up and remediation</li> <li>Impact extends outside site operational areas and impacts immediate environment</li> <li>Immediate impact on surrounding native flora and fauna.</li> <li>Volume released &gt;1000 L</li> </ul> | <ul style="list-style-type: none"> <li>Major damage / failure of equipment and significant impact on production</li> <li>High intensity unrest requiring evacuation of personnel</li> <li>Immediate impact on Community.</li> </ul> |

## 4.3 Termination of Emergency Response

Monitoring and assessment of the incident are used to determine when response and recovery measures may be terminated, based on the criteria described in the subsections below. Given the nature of the spill scenarios associated with this OSCP, termination criteria for Level 1 spill events are to be made alone by BNR. For larger spill events (Level 2 and 3 events) it is expected that this decision may be made by BNR in consultation with the DEMIRS and other relevant agencies.

### 4.3.1 Level 1 Response

The OSC, in consultation with the IC, will declare "ALL CLEAR" once:

- All personnel have been accounted for
- The spill has been contained and controlled

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| Review Frequency: Extreme/High=1yr; Medium=2yr; Low=3yr                  | 1               | Date Review Due: | 17/02/2027 | Page:     | 16 of 23        |  |  |



- All contaminated material associated with the spill has been cleaned up
- The operation and / or supporting facilities have been returned to a safe condition
- There is no immediate or residual threat to the environment
- All authorities, organisations and / or support services contacted have been advised the emergency or spill response is over.

#### 4.3.2 Level 2 / Level 3 Response

The OSC, in consultation with the IC, will declare "ALL CLEAR" once:

- All personnel have been accounted for
- The spill has been contained and controlled
- All contaminated material associated with the spill has been cleaned up
- Any environmental monitoring has been completed and verifies all contaminated material has been removed from site
- The operation and / or supporting facilities have been returned to a safe condition
- There is no immediate or residual threat to the environment
- All authorities, organisations and / or support services contacted have been advised the emergency or spill response is over.

Following a Level 2 or 3 incident, the OSC shall liaise with the IC and the CMD to terminate the response once the risks have been mitigated or controlled. Investigations and business continuity impacts may continue as part of the IMT or CMT.

A debriefing session will be held within two weeks of the incident occurring to ensure key aspects can be readily recalled. The debrief should seek to improve preparedness and response and identify recovery strategies and actions for future incidents. Following the debriefing session, this OSCP may need to be reviewed.

#### 4.4 Spill Recovery Equipment

To support the first strike/immediate response actions in the event of a spill as directed by the OSCP, the Company will ensure that spill recovery equipment is available within the Operational Area and on mobile service trucks transporting diesel.

The suggested spill recovery equipment and location of spill kit resources for Activities are listed in Table 4-3.

Each 240 L spill kit has the capability to recover between 200 and 500L of oil depending on the nature of the spill. For a larger spill event, and as is standard procedure, spill kits are used with the objective to contain the spill to an area, and any leftover absorbent pads are used to absorb as much free oil as possible. Based upon having up to 4 x 240 L spill kits onsite (Table 4-3) BNR believes sufficient equipment exists to respond to the credible worst case scenario for this activity.

**Table 4-3: Suggested spill recovery equipment and location for Activity**

| Location                                          | Spill Equipment                                                                                                                                                             |
|---------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Hydrocarbon and Hazardous Substance Storage Areas | <ul style="list-style-type: none"><li>• 1 x Shovel</li><li>• 1 x Rake</li><li>• 1 x up to 240 L General Maintenance Spill Kit</li><li>• 1 x DCP fire extinguisher</li></ul> |
| Fuel Tank                                         | <ul style="list-style-type: none"><li>• 1 x Shovel</li><li>• 1 x Rake</li><li>• 2 x up to 240 L Oil and Fuel Spill Kit</li><li>• 2 x DCP fire extinguishers</li></ul>       |
| Mobile Service Truck                              | <ul style="list-style-type: none"><li>• 1 x 240 L Oil and Fuel Spill Kit</li></ul>                                                                                          |



## 4.5 Personnel

Under the EP (BNR\_HSE\_MP\_010), the following key personnel have been identified:

- COO (IC)
- Project Manager (OC)
- Environmental Lead
- Onsite personnel (SRT).

In addition to this, BNR have access to labour hire companies to enable additional personnel to be contracted to support a spill event if required.

### 4.5.1 Roles and Responsibilities

Table 4-4 summarises key responsibilities for personnel and response teams involved in an oil spill response incident. The Site Response Team (SRT) will consist of the contract crew numbers and BNR representatives. This is expected to be approximately 4-6 persons who will act as per BNR's Emergency Response Procedure (BNR\_HSE\_PR\_001) and this OSCP. The Incident Management Team (IMT) can be 2-4 BNR / contractor persons who are typically based in corporate that will work as per BNR's Incident Management Plan (BNR\_HSE\_MP\_003) to support the SRT with resources.

**Table 4-4: Responsibilities of Key Personnel**

| Person                   | Responsibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Initial Responder        | <ul style="list-style-type: none"> <li>• Initial assessment of spill or leak (Initial Spill Response Checklist)</li> <li>• Contain, control (isolate) and clean up any Level 1 spills, if safe to do so</li> <li>• Immediately report to the Supervisor / Person in Charge (PIC)</li> <li>• Ensure all spills, regardless of volume, are reported to Shift Supervisor.</li> </ul>                                                                                                                                                                                              |
| Project Manager          | <ul style="list-style-type: none"> <li>• Overall execution of this OSCP including coordination of safety, control, containment, clean-up, and reporting</li> <li>• Act as On-Scene Commander (OSC) to coordinate onsite personnel and resources for control and recovery of Level 2 and 3 spills</li> <li>• Ensure all spills, regardless of volume, are recorded and reported to HSE Lead</li> <li>• Inspection, maintenance and replacement of spill materials, equipment, and PPE</li> <li>• Lead and participate in spill response training and drills on site.</li> </ul> |
| SRT– Site Based          | <ul style="list-style-type: none"> <li>• Reporting to the OSC, the SRT is responsible for spill response operations onsite</li> <li>• The SRT will include operational personnel present at site (e.g., contractors)</li> <li>• Ensure appropriate PPE and safety equipment is utilised, where required.</li> </ul>                                                                                                                                                                                                                                                            |
| On-Scene Commander (OSC) | <ul style="list-style-type: none"> <li>• Activate Emergency Response for all Level 2 and 3 spills</li> <li>• Obtain full details of the spill and activates the Incident Management Team (IMT)</li> <li>• Supports and coordinates the SRT as required</li> <li>• Responsible for co-ordination of planning, operations, and logistics for Level 2/3 spills</li> <li>• Assesses the need for additional external resources and personnel</li> <li>• Ensure all Level 2 and 3 incidents and spills are investigated and reported.</li> </ul>                                    |
| IMT – Corporate          | <ul style="list-style-type: none"> <li>• Provides logistical and technical support to the OSC and SRT in the event of Level 2 and 3 spills</li> <li>• Ensure relevant internal and external stakeholders are notified and coordinate spill response with external agencies as required</li> <li>• Ensure relevant internal and external stakeholders are notified</li> <li>• Ensure that the team log is maintained by the 'Log Keeper' and that all documentation is collated for later reference.</li> </ul>                                                                 |
| COO                      | <ul style="list-style-type: none"> <li>• Act as Incident Controller (IC) to lead the IMT in response to an incident.</li> <li>• Engage with CMT to activate BME specialist technical advice.</li> <li>• Ensure spill response exercise is undertaken at least once during Activity.</li> </ul>                                                                                                                                                                                                                                                                                 |

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| Person | Responsibility                                                                                                                                                                                                                              |
|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|        | <ul style="list-style-type: none"><li>Overall responsibility to ensure adequate training and resourcing including sourcing contingency resources and personnel.</li><li>Overall accountability for managing any incident on site.</li></ul> |

#### 4.5.2 Training

Internal training for personnel includes the following:

- HSE inductions and orientation (in accordance with BNR\_HSE\_MP\_010)
- Participation in oil spill response exercise. These include at least one emergency response exercise, and
- Use of site-specific equipment including emergency / spill response items (usually completed at the same time as the oil spill response exercise).

Records of internal and external training, exercises and drills conducted are maintained by BNR.

Specialist equipment, such as civil earthmoving equipment that require specific training and competence requirements is to be operated by external contractors that hold the required training and competence certifications. Consequently, no additional training is required under this OSCP.

#### 4.6 Testing

The Guideline for the Development of an Onshore Oil Spill Contingency Plan (DMP, 2016) states that the OSCP requires testing at specified intervals, noting that the specified intervals may include:

- When introduced
- When significantly amended
- Not later than 12 months after the most recent test
- When a new location for the activity is added
- When a new facility or structure under the scope of the OSCP becomes operational.

Due to the scale and nature of the Activity, only one test is expected to occur during the course of the survey.

Following each test, a de-briefing session will be held to identify any corrective actions resulting from lessons learnt as a result of the response. These corrective actions shall be recorded in the Incident Management Register (BNR\_HSE\_RG\_002).

Any change to Company documents and procedures will be implemented in accordance with the Management of Change Plan (BNR\_MGT\_MP\_002).



## 5 Spill Recovery, Waste Management and Cost Recovery

### 5.1 Spill recovery method

All hydrocarbon and hazardous substance spills must be appropriately cleaned up where safe and practicable to do so. All contaminated material will be removed from site and disposed of at an appropriately licensed waste disposal facility. An overview of expected recovery methods for the activity is provided in Table 5-1.

**Table 5-1: Proposed recovery methods**

| Type of Contamination          | Recommended Clean-up Equipment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Free Product (liquid or solid) | <ul style="list-style-type: none"> <li>Bund with earthen bund transport to disposal facility.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Surface hydrocarbon on ground  | <ul style="list-style-type: none"> <li>Spread absorbent material or lime on affected ground surface. Remove (excavate) and replace absorbent product regularly until evidence of hydrocarbon draw ceases</li> <li>Lay plastic sheet/tarpaulin in a disposal holding area (to be designated in the event of a spill)</li> <li>Install bunding in disposal holding area</li> <li>Remove contaminated product to the disposal holding area.</li> </ul>                                                                                                  |
| Contaminated Soils             | <ul style="list-style-type: none"> <li>Hydrocarbon contaminated soils are to be removed entirely by either manual or mechanical methods</li> <li>Remove contaminated soils to a designated disposal holding area</li> <li>Sample contaminated soils against solid waste to landfill guidelines to determine method of disposal</li> <li>Contaminated soil is to be removed by a licensed carrier to an approved facility</li> <li>Sample soil underneath and around contaminated site to determine if all contamination has been removed.</li> </ul> |

### 5.2 Waste Management

Contaminated material resulting from an oil spill requires removal and disposed of in an appropriate class landfill facility. Contact details for waste service providers are provided in Table 5-2 below. Where a small spill has occurred, local landfill facilities are to be consulted for advice on dilution requirements (i.e. adding of clean soils to dilute contaminant concentration).

For larger spills, where the total quantity of contaminated soil is uncertain, the management of contaminated waste includes:

- Samples to be taken and waste material tested by NATA accredited laboratory to identify contaminant concentrations present
- Number of samples taken and general methodology to be commensurate with DEC Guidelines for the Development of Sampling and Analysis Programs (2001)
- Results from laboratory analysis to be compared with the criteria defined in the DEC Landfill Waste Classification and Waste Definitions Guideline 1996 (as amended in 2009)
- Waste material to be removed from site and disposed of at the appropriate class landfill facility (as directed in the abovementioned DEC Landfill Guidelines) – prior to the completion of site clean-up.

Note: appropriately qualified consultants or contractors will be engaged for soil testing, analysis and removal and disposal.

**Table 5-2: Licensed Controlled Waste Service Providers**

| Service Provider | Contact |
|------------------|---------|
|------------------|---------|



Toxfree (Broome)

(08) 9194 5200

Toxfree (Derby)

(08) 9161 6400

Great Northern Logistics (Broome)

(08) 9192 1447



### 5.3 Oiled Wildlife Response

The Department of Biodiversity, Conservation and Attractions (DBCA) is the lead agency in WA for an oiled wildlife response technique. DBCA has the responsibility and statutory authority to treat, protect and destroy wildlife as outlined in the Biodiversity Conservation Act 2016.

DBCA also has a legislative requirement to ensure the humane treatment, housing and release or euthanising of fauna under the Animal Welfare Act 2002. In the event of an emergency event where oiled wildlife were encountered, the DBCA Wildcare Helpline are to be immediately consulted for advice on the management of affected fauna.

Given the nature of the spill events, and in accordance with the WA Oiled Wildlife Response Plan, as only single oiled animals are expected to be encountered, they would be treated on direction of DBCA using local resources (veterinaries, wildlife carers or Parks and Wildlife staff). If additional resources were required, BNR has access to labour hire companies and external environmental consultants that can help during an escalation of oiled wildlife response.

### 5.4 Cost Recovery

The Company holds sufficient insurances that would cover the costs associated with response, recovery, remediation and monitoring resulting from the potential spills identified in this OSCP.



## 6 Reporting requirements

Spill response reporting requirements are detailed in Section 6.3 of the EP (BNR\_HSE\_MP\_010) and thus have not been duplicated here.