

100017

14 June 2018

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Dear James

Request for Further Information

Under section 54(1) of the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 (the EEZ Act), the Environmental Protection Authority (EPA) requests further information relating to your application for a marine discharge consent from offshore processing and drainage related to the proposed 2019-20 exploration drilling campaign.

The further information requested and the reasons for requesting this information are attached in Appendix 1. We would be happy to discuss the details of this request further.

Timeframes

In accordance with section 55 of the EEZ Act, within 5 working days after the date of this request you must either:

- a. provide the requested information; or
- b. write to the EPA confirming you agree to provide the requested information; or
- c. write to the EPA informing it that you refuse to provide the requested information.

If the EPA receives written confirmation from you that you agree to provide the requested information, we are then required to set a reasonable time within which you must provide the information to us and write to you telling you the date by which you must provide the information (section 55(2) of the EEZ Act).

We anticipate that **2 July 2018** is a reasonable date for providing the further information. If you think you will be unable to provide the information to us by that time, please indicate a date by which you will be able to provide it to us.

If you have any questions please do not hesitate to contact June Cahill on phone number 04 474 5461 or email june.cahill@epa.govt.nz

Yours sincerely

A handwritten signature in black ink, appearing to read "Greg Hill", followed by a period.

Greg Hill Chairperson, Decision-making Committee for EEZ100017

Appendix 1 – Further Information request, June 2018

Best Practice

As outlined in the letter to the OMV on 4 May 2018, the EPA commissioned Oil and Gas Solutions (OGS) to undertake a technical review of OMV's marine discharge consent application associated with the discharge of harmful substances from hazardous and non-hazardous deck drains from a Mobile Offshore Drilling Unit (MODU). In the draft report OGS has identified a number of points requiring clarification that would be valuable in understanding the proposed activities.

- 1) Confirm that the design of all bunds, coaming and hard covered bunded pallets for hazardous areas will contain the maximum volume of harmful substances stored in all vessels or containers held in the governed area in the event of leak or rupture.
- 2) Will the MODU have automated alarms to monitor oil-in-water content prior to discharge, if not what method or system will be used?
- 3) Will the regular water checks be carried out on the MODU or sent onshore for analysis?
- 4) How are the solids collected and where do the solids go as they build up in the collection tank?

Other Matters

Although the MODU has not been selected it would be useful to know if OMV anticipate using any harmful substances in the deck drains, specifically:

- 5) As part of the maintenance operations on the MODU, will there be any treatment of the deck drains with harmful substances, for example corrosion inhibitors or biocides?
- 6) What types of cleaning products will be used on the deck and deck drain areas? Would any of these products be considered a harmful substance?

END OF REQUEST