

WGWAP Recommendations Table - South Piltun

Meeting	Reference	Cross-Reference	Topic	Recommendation	Party resp.	Response	Target completion date	Status	Superseded by
M. WGWAP-9	WGWAP-9/015	4.3.1	South Piltun	Therefore, while recognising that Sakhalin Energy may view the construction of a third platform as necessary at some point during the lifetime of the project in order to meet its petroleum recovery targets, the Panel recommends that construction not begin until there is better understanding of the effects of noise disturbance on the whales (e.g. a more thorough analysis of the potential effects of PA-B construction) and appropriate mitigation measures are in place.	Sakhalin Energy	Sakhalin Energy is preparing to conduct an overall analysis of the impact of the Companies' activities on the WGW population. This should enhance the understanding of the effect of noise disturbance of the whales. Obviously lessons learned from the PA-B construction will be used for the development of a MMP aimed a reducing impact of construction on the whale population to as low as reasonable practical. Also, Sakhalin Energy plans to continue its work as a part of programme on 3 core items of Acoustics, Benthos and Distribution. However, this view is not supported by MNR who informed SEIC that they considered the 2011 acoustic programme to be unnecessary.	Progress report at WGWAP-10	Open - no action yet taken	
M. WGWAP-9	WGWAP-9/016	4.3.2	South Piltun	The Panel recommends that before making any decision on whether and how to proceed with this proposed new construction (PA-C), Sakhalin Energy should provide for the Panel's consideration at WGWAP-10: A document describing the feasible options considered in reaching the current tentative decision to proceed with a new platform. This document should include, in particular, an indication of how the risks to western gray whales and their habitat posed by the various options have been accounted for and compared.	Sakhalin Energy	The Company have stated that "whether and how to proceed with the proposed future development..." is dependent on meeting a number of criteria that will be considered ahead on Final Investment Decision. The purpose of engaging with WGWAP on the issue is precisely to allow consultation to have taken place. Two feasible options were presented at WGWAP-9 and more details on these will be discussed at WGWAP-10	WGWAP-10	Open - no action yet taken	
M. WGWAP-9	WGWAP-9/017	4.3.2	South Piltun	The Panel recommends that before making any decision on whether and how to proceed with this proposed new construction (PA-C), Sakhalin Energy should provide for the Panel's consideration at WGWAP-10: A document describing and comparing options under consideration for transporting oil and gas from the new platform, again specifying how the risks to western gray whales and their habitat posed by the various options have been assessed and compared.	Sakhalin Energy	No written report will be available at WGWAP10, but draft options will be presented via a slide presentation at WGWAP10, with focus on the early oil phase.	WGWAP-10	Open - no action yet taken	

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M. WGWAP-9	WGWAP-9/018	4.3.2	South Piltun	The Panel recommends that before making any decision on whether and how to proceed with this proposed new construction (PA-C), Sakhalin Energy should provide for the Panel's consideration at WGWAP-10: A general operations plan which includes all of the company's foreseeable and foreseen activities for 2011-2015 with the potential to disturb or otherwise harm western gray whales and their habitat (e.g. seismic surveys).	Sakhalin Energy	SEIC will provide the SEIC journey book, which is a 5 year look ahead at SEIC plans, focus areas and activities..	WGWAP-10	Open - no action yet taken	
M. WGWAP-9	WGWAP-9/019	4.3.2	South Piltun	The Panel agrees on the value of such an exercise and recommends that Sakhalin Energy prepare for consideration at WGWAP-10 a document that summarises progress made since 2004 towards resolving uncertainties and filling data gaps highlighted in past western gray whale panel reports.	Sakhalin Energy	SEIC has agreed (with ENL) that there is value in taking all the learnings from WGW mitigation & monitoring programmes into account, so as to manage the business risk WGW pose. The document requested here will not be available in the timeframe requested, as it is a significant piece of work.	WGWAP-10	Open - no action yet taken	
M. WGWAP-9	WGWAP-9/020	4.3.2	South Piltun	In addition, Sakhalin Energy has already agreed, and the Panel recommends , that the company provide a comprehensive overview of the issues and risks that need to be addressed for a new development such as South Piltun, including inter alia oil spills, continuous noise, vessel collisions, disturbance of benthos and cumulative impacts. This overview should include a risk matrix that makes clear how Sakhalin Energy would prioritise the various elements, as well as how the company assesses each issue in terms of potential short-, medium- and long-term effects on the western gray whale population.	Sakhalin Energy	Sakhalin Energy will now address this recommendation as part of the Impact Assessment, which will be prepared for the project.	WGWAP-10	Open - no action yet taken	

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M. WGWAP-10	WGWAP-10/002	Item 2.2	South Piltun	Given the above, the Panel reiterates that the key element of the agreed mitigation programme – starting the survey as early in the season as possible to minimise the risk of injury or disturbance to gray whales – is essential. Therefore, the Panel strongly recommends that, if the 2-D survey occurs in 2011, it should only be if Sakhalin Energy ensures that: (1) The survey starts significantly earlier, i.e. as early in the season as ice conditions allow, as was intended for the 2010 survey; and (2) The monitoring and mitigation plan as specified in the SSTF-6 report (and as refined in the SSTF-7 report) is fully implemented, including (a) shut-down if daytime visibility is less than 1000m; (b) that experienced MMOs are used who have received training in estimating distance at sea; and (c) that two MMOs operate at the same time during operations and receive adequate rest periods in accordance with the specified mitigation measures.	Sakhalin Energy	Sakhalin Energy has adopted ALL recommendations on the monitoring and mitigation plan for the geotechnical survey. (1) However, the survey has been postponed because SEIC encountered delays in the contractors permitting. The survey is moved to 2012 and will be executed as early in the season as possible, noting it is entirely dependent on contractor availability. (2) Agreed, with the exception of the 1000m criteria discussed at SSTF-7, where if there is persistent fog, SEIC with WGWAP will revisit the 500m shut-down criteria as an option in order to ensure as short a duration survey as possible.	2-D seismic survey	Open - in need of clarification/expansion	
M. WGWAP-10	WGWAP-10/018	Item 12.2	South Piltun	The Panel requests that Sakhalin Energy provide a clear explanation of how the objective of minimising potential impacts on gray whales and their habitat has been reconciled with the phasing of oil and gas exploitation at South Piltun.	Sakhalin Energy	SEIC will address this at the next WGWAP meeting.	WGWAP-11	Open - no action yet taken	

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M. WGWAP-10	WGWAP-10/019	Item 12.2	South Piltun	The Panel requests clarification of this apparent inconsistency between the company's EIA for Phase 2 and its current conclusion that a third platform will be needed for 'full field development'.	Sakhalin Energy	<p>The EIA for Phase 2 TEO-C chapter 5.2.1 says the following: "Over the 1990s major advances in extended reach and non-vertical drilling has allowed for a single platform to extend its lateral reach up to 6 km. This has greatly reduced the number of platforms needed to three for full field development, which resulted in a smaller "footprint" i.e. the overall offshore impact. PA-V platform option was determined to be currently uneconomic, but has been kept as a future option."</p> <p>Reservoir performance determines the ultimate drainage configuration required and is therefore monitored during the lifetime of production. Dependent upon this, the Operator must determine how best to fulfill the requirements to maximise recovery of hydrocarbons, which is an implicit requirement of the PSA. Based on the observed reservoir performance, the drainage configuration and current technologies, it is now apparent that to fulfill PSA requirements an additional platform is required.</p>	WGWAP-11	Open - no action yet taken	

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M. WGAP-10	WGAP-10/020	Item 12.4	South Piltun	<p>Finally, the Panel again recalls its earlier recommendation (WGAP 5/011) that there be no further industrial activities that might be expected, in the absence of independently verified mitigation measures (such as those developed for the Astokh 4D survey), to disturb gray whales in and near their main feeding areas off Sakhalin. And it reiterates its statement from the last meeting report, as follows: Whilst recognising that Sakhalin Energy may view the construction of a third platform as necessary at some point during the lifetime of the project in order to meet its petroleum recovery targets, the Panel recommends that construction not begin until there is better understanding of the effects of noise disturbance on the whales (e.g. a more thorough analysis of the potential effects of PA-B construction) and appropriate mitigation measures are in place. In this regard, consideration must be given not only to the platform-related construction activities themselves, but also to the cumulative risks to the western gray whale population from other associated activities, including seismic surveys, and any general increase in temporary or permanent human presence in the area that may result directly or indirectly from further construction projects.</p>	Sakhalin Energy	SEIC acknowledges the Panel concerns, hence the early engagement with the Panel on the topic of S. Piltun development. One important document is the Environmental Impact Assessment, which will also address cumulative impacts.	Clarification of intent by WGAP-11	Open - no action yet taken	