



2010 Exploration Drilling Communication Plan Beaufort Sea, Alaska

June 2009

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1.0 Introduction

The following Communication Plan will be used during the 2010 exploration drilling season to coordinate activities with local subsistence users, including the Alaska Eskimo Whaling Association (AEWC) and village Whaling Captains Associations (WCA).

The planned drilling season in Camden Bay at the Sivulliq and Torpedo drill sites will begin on or about July 10 and run through October 31, 2010, will suspend operations starting August 25 for the Nuiqsut (Cross Island) and Kaktovik subsistence bowhead whale hunts.

The Communications Plan will be implemented in two phases. Phase I describes the guidelines already in place to ensure proper communication during the drilling season. Phase II describes what to do in the event Shell activities potentially affect subsistence activities and how to keep subsistence user groups informed of Shell activities. Phase I and II are designed to minimize the potential for interference of Shell activities with subsistence activities and resources. This plan will keep operators up-to-date regarding the timing and status of the bowhead whale migration in the Beaufort and Chukchi Seas, as well as the timing and status of other subsistence hunts.

Drilling program operations will be performed in compliance with all applicable permits and authorizations, including the Plan of Cooperation (POC), U.S. Fish and Wildlife Service (USFWS) Letter of Authorization (LOA), National Marine Fisheries Service (NMFS) Incidental Harassment Authorization (IHA), and Minerals Management Service (MMS) Lease Stipulation 5 from lease sale 193, 195, and 202.

2.0 Communication Plan Procedures

PHASE I

The following steps will be taken in Phase I:

- Marine Mammal Observers (MMOs) will be onboard vessels to perform the following functions: monitor marine mammals presence; assist with the maintenance of marine mammal safety zones around vessels; monitor and record avoidance or exposure behaviors; and communicate between the Communication (Com) and Call Centers and local subsistence hunters by marine radio.
- If a conflict arises with offshore activities, the MMOs will contact the vessel captain and the Com and Call Centers immediately. The Com and Call Centers will then contact Shell's simultaneous operations emergency response team. If avoidance is not possible, a Shell representative will communicate with a representative from AEWC and the WCA to resolve the issue and plan an alternative course of action by either industry or the subsistence groups.
- Shell will employ local Subsistence Advisors (SAs) from the Beaufort and Chukchi Sea villages to provide consultation and guidance regarding the bowhead whale migration,

the subsistence hunt, and other subsistence activities. The SAs will work approximately eight hours per day and 40 hours a week through 2010. SAs will report any subsistence concerns or conflicts to the Com and Call Center within four hours if the conflict appears imminent and the Com and Call Center will contact Shell's simultaneous operations emergency response team. The SAs will coordinate with subsistence users to communicate the location and timing of Shell activities; report subsistence-related comments, concerns, and information to Shell staff; and advise Shell on avoiding subsistence user conflicts. An SA handbook will be developed and provided to each SA. The handbook will outline contact numbers, communication procedures, and communication timelines for reporting conflict situations.

- Helicopter flight restrictions will be in place to prohibit flying within 1,000 ft (300 m) of marine mammals or at an altitude below 1,500 ft (457 m), with the following exceptions: during takeoffs and landings; in emergency situations; or for MMO land and sea overflights. If flights need to deviate for emergencies, the new flight information will be shared immediately with Com and Call Centers, as outlined by Shell HSE requirements, so area subsistence users can be notified.
- Regular overflight and support vessel surveys for marine mammals will be conducted to avoid conflicts and further monitor prospect areas and identify areas in use for subsistence activities
- The drillship and support vessels traversing north through the Bering Strait will transit through the Chukchi Sea along a route that allows for the highest degree of safety regarding ice conditions and sea states. This will minimize impacts on marine mammals and subsistence hunting activities. Those vessels that can safely travel outside of the polynya zone will do so. If they cannot safely travel outside the zone, they will manage ice by pushing it out of the way. If ice breaking becomes a concern, vessels will move into the polynya zone far enough that ice breaking is not required. If a vessel must move into the polynya zone, Shell will notify the local communities of the change in the transit route through the Com and Call Centers.

PHASE II

All guidelines in Phase I will be adhered to, in addition to the following:

- The Com and Call Center Action Plan will be used to manage conflicts between Shell activities and subsistence activities;
- Shell will continue regular communication and engagement with the AEW and WCAs of Barrow, Kaktovik, and Nuiqsut to announce the start of vessel transit, periods of vessel transit through the Chukchi to the Beaufort Sea, the beginning of drilling operations, the start of the no-drilling blackout for the Kaktovik and Nuiqsut fall bowhead whaling, and during operations mobilization from the Beaufort Sea.