



# 2010 Exploration Drilling Communication Plan Chukchi Sea, Alaska

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July 2009

Prepared for:

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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 Commission (AEWC), Alaska Eskimo Walrus Commission (AWC), Alaska Nanuuq Commission (ANC), Alaska Beluga Whale Committee (ABWC), Ice Sea Committee (ISC), and village Whaling Captains Associations (WCA). The planned drilling season in the Chukchi Sea will begin on or about July 4 and end on or about October 31, 2010.

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 and to keep operators up-to-date regarding the timing and status of the bowhead whale migration in the Chukchi Sea 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, Letter of Authorization per U.S. Fish & Wildlife Service (USFWS), Incidental Harassment Authorization (IHA) per National Marine Fisheries Service (NMFS) and Lease Stipulation 5 from lease sale 193 per Minerals Management Service (MMS).

## 2.0 Communication Plan Procedures

### PHASE I

- Marine Mammal Observers (MMO) will be onboard exploration drilling-related vessels with responsibilities to: monitor for the presence of marine mammals, assist with the maintenance of marine mammal safety radii around vessels, monitor and record avoidance or exposure behaviors, and communicate with the Communication and Call Centers (Com Centers) and local subsistence hunters by marine radio.
- If a conflict arises with offshore activities, the MMOs will immediately contact the vessel captain and the Com Centers. The Com Centers will then contact Shell's simultaneous operations emergency response team. If avoidance is not possible, the next phase will include communication between a Shell representative and a representative from the impacted subsistence hunter group(s) to resolve the issue and plan an alternative course of action by either industry or the subsistence groups.
- Shell Gulf of Mexico Inc. (Shell) will employ local Subsistence Advisors from the Chukchi Sea villages to provide consultation and guidance regarding the affected species migration, the subsistence hunt, and other subsistence activities. The Subsistence Advisors will work approximately 8-hours per day and 40-hour weeks through 2010. Responsibilities of the Subsistence Advisors will include: reporting any subsistence concerns or conflicts, within 4-hours if the conflict appears imminent, to the Com Centers (who will then contact Shell's simultaneous operations emergency response team); coordinating with subsistence users to advise on location and timing of Shell's activities; reporting subsistence-related comments, concerns, and information to Shell staff; and, advising Shell how to avoid subsistence conflicts and



subsistence users. A subsistence advisor handbook will be developed and provided to each Subsistence Advisor. The handbook will outline contact numbers, communication procedures, and communication timelines for reporting and communicating potential conflict situations.

- Helicopter traffic flight restrictions will be in place to prohibit aircraft from flying within 1,000 feet (ft) (300 meters [m]) of marine mammals or below 1,500 ft (457 m) altitude, (except during takeoffs and landings, in emergency situations or for MMO overflights), while over land or sea. If flights need to deviate from this path due to emergency landings or other unavoidable reasons, the new flight information will be immediately shared, as outlined by Shell HSE requirements, with Com Centers so area subsistence users can be notified.
- Regular overflight surveys and support vessel surveys for marine mammals will be conducted to further monitor prospect areas and identify areas currently being used for subsistence activities to avoid potential conflicts with users.
- To minimize impacts on marine mammals and subsistence hunting 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. Those vessels that can safely travel outside of the polynya zone will do so unless it is necessary to break ice, as opposed to managing ice by pushing it out of the way. In this case those vessels will move into the polynya zone far enough so that ice breaking is not necessary. If it is necessary for any vessel to move into the polynya zone, Shell will notify the local communities of the change in the transit route through the Com Centers.

## PHASE II

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

- If potential conflicts are identified between Shell activities and subsistence activities; the Com Center Action Plan will be used to manage the issue.
- Shell will continue with engagements and regular communications with the AEW, AWC, ANC, ABWC, ISC, and the WCAs of Barrow, Wainwright, Point Lay, and Point Hope once transiting of vessels begins through Chukchi Sea, during drilling activities, and during mobilization from the Chukchi Sea.