ATTACHMENT O SPILL RESPONSE PLAN

Spill Response Plan

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Position	Name	(tick one column only)		Signature	Date
		Approve	Review		
Environment Manager	Trina Jensen	☒			17/03/2017

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REVISION HISTORY

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7	17/03/2017	Issued for Use	Document Review	Trina Jensen	

GLOSSARY OF TERMS

Term	Description
AITR	Action Item Tracking Register
ASX	Australian Stock Exchange
BCM	Business Continuity Management
BBL	Barrels. Note - 1 barrel equals 159 litres
CMP	Crisis Management Plan
CMTL	(Brisbane) Crisis Management Team Leader
Containment	Primary - a tank, vessel, pipe, truck or equipment intended to serve as the primary container or used for processing or transfer of material. Secondary – exists to contain or control a release from primary containment, includes bunds, collection and drainage systems, outer wall of double walled tanks etc.
Crisis	A crisis is a major event with potential shareholder impact, and negative impacts on company reputation and / or legal liability. It may be managed from the Brisbane office and it may require the assistance of external support services. A Crisis event may have broader company impacts such as media attention, legal liability, financial and business continuity implications. Some examples of a crisis event that would escalate beyond an emergency would include: • Fatality; • Significant environmental spill to sensitive area (e.g. Cooper Creek); • Destruction of, or significant damage to major infrastructure and/or assets; • Loss of well control & blowout.
Emergency	An emergency is an event that requires company resources and / or external resources not immediately available to the site. The initial event may have some impact outside the site and may involve the local emergency services and / or local Government authorities. An emergency will require a coordinated management response from the site-based emergency response personnel as well as support coordinated by the Brisbane-based emergency response personnel. Emergency events may include: • Situation requiring large scale evacuation by air; • Major environmental spill • Serious injury requiring medivac / multiple casualty events; • Extreme weather event; • Serious fire / explosion.
EMTL	(Brisbane) Emergency Management Team Leader
EPA	Environment Protection Authority / Agency
ER	Emergency Response
ERP	Emergency Response Plan
ERTL	(Site) Emergency Response Team Leader
HR	Human Resources

Term	Description
HSE	Health, Safety and Environment
IBC	Intermediate Bulk Container (chemical container)
LOPC	Loss of Primary Containment – an unplanned or uncontrolled release of any material (substance with the potential to cause harm due to its chemical or physical properties) from primary containment
OCR	(Senex) Onsite Company Representative
RL	(Site) Response Liaison
RM	(Site) Response Manager
RT	(Site) Response Team
RTL	(Site) Response Team Leader
SCBA	Self-contained breathing apparatus
Senex	Senex Energy Limited

1 INTRODUCTION

1.1 Purpose

This Spill Response Plan provides the standard protocols that must be utilised in order for Senex to respond in an appropriate and timely manner in the event of a spill. The procedure details the following steps:

- Prevention – take actions to reduce or eliminate the likelihood of effects of an incident.
- Preparedness – take steps before an incident to ensure effective response and recovery.
- Response – contain, control or minimise the impacts of an incident.
- Recovery – take steps to minimise disruption and recovery times.

In particular the procedure provides a common system and focus for spill response support and response hierarchy, which includes:

- Preserve life and ensure the safety of people;
- Minimise the impact on the environment; and
- Preservation of Senex's reputation, commercial operability and business continuity.

1.2 Scope

Procedures described in this manual are intended to support Senex in the event of a spill and to reflect the regulatory requirements for spill management. The procedure applies to all Senex operations, sites and/or activities undertaken by Senex and/or Contractor personnel on Senex business. Activities of primary contractors, subcontractors and suppliers are also covered under this plan whilst working on a Senex site.

1.3 Senex Crisis and Emergency Management Documentation Hierarchy

Documents associated with the Senex Spill Response Procedure are outlined in Figure 1 below.

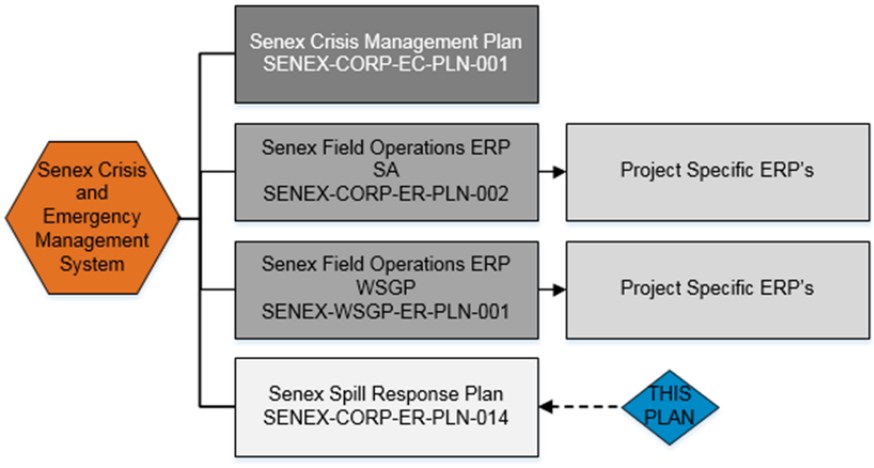


Figure 1 Senex Crisis and Emergency Response Document Hierarchy

2 RECOGNISING INCIDENT, EMERGENCY AND CRISIS SITUATIONS

2.1 Incident

For the purposes of this plan an incident is an unplanned or unexpected deviation from normal operations affecting HSE actual and potential consequences. An incident is resolved utilising the resources immediately available on site and may not require any external assistance.

2.2 Emergency

An emergency is an event that requires company resources and / or external resources not immediately available to the site. The initial event may have some impact outside the site and may involve the local emergency services and / or local Government authorities. An emergency will require a coordinated management response from the site-based emergency response personnel as well as support coordinated by the Brisbane-based emergency response personnel. Emergency events may include:

- Situation requiring large scale evacuation by air;
- Major environmental spill
- Serious injury requiring medivac / multiple casualty events;
- Extreme weather event;
- Serious fire / explosion.

2.3 Crisis

A crisis is a major event with potential shareholder impact, and negative impacts on company reputation and / or legal liability. It may be managed from the Brisbane office and it may require the assistance of external support services. A Crisis event may have broader company impacts such as media attention, legal liability, financial and business continuity implications. Some examples of a crisis event that would escalate beyond an emergency would include:

- Fatality;
- Significant environmental spill to sensitive area (e.g. waterway);
- Destruction of, or significant damage to major infrastructure and/or assets;
- Loss of well control & blowout.

3 SPILL CLASSIFICATION STANDARD

Senex has adopted the internationally accepted Tiered Response classifications to describe different categories of spill events, based on severity and location. Tier classifications are determined based on spill volume, environmental sensitivity, potential social impacts and other factors specific to the event.

3.1 Senex Tier 1 (Emergency/Crisis Event)

A Tier 1 Loss of Primary Containment (LOPC) event has the greatest potential consequences.

Volume	Typical Spill Scenario
LOPC of greater than 1, 000bbls or 1,000 tonnes	Event may be a result of a pipeline rupture or uncontrolled tank failure. Potential for catastrophic release with the potential for serious and long term environmental harm with widespread or permanent impact, significant impact on reputation, major breach of legislation, potential media exposure, activation of Senex Emergency Management or Crisis Management.
Response	
The response to a Tier 1 event will likely require mobilisation of additional resources and support. Response operation will utilise all of Senex's available spill response resources, augmented with additional resources where required. Support will be required from the Senex Emergency Management Team (EMT) and (if activated) the Crisis Management Team (CMT).	

3.2 Senex Tier 2 (Major Spills)

A Tier 2 LOPC event with a moderate consequence.

Volume	Typical Spill Scenario
LOPC between 10 – 1,000bbls or 10 - 1,000t	Event may be a result of a large fuel losses, failure during loadout, small to medium pipe failure. Potential for significant but short term environmental harm with localised or permanent impact, serious breach of legislation requiring urgent notification to regulators.
Response	
The response to a Tier 2 event will likely require clean-up using existing spill equipment and potentially requiring additional or specialised response equipment depending on volume and nature of spill. Support from the Emergency Management Team, if activated, may be required.	

3.3 Senex Tier 3 (Minor Event)

A Tier 3 LOPC event with a lesser or minor consequence.

Volume	Typical Spill Scenario
LOPC of less than 10bbls or 0 – 10t	Small operational spills which may result from refuelling, valve leaks, loadout, routine maintenance and operations. Minor and short term environmental with localised impact, no breach of legislation.
Response	
The response to a Tier 3 event can be resourced using spill response kits located at the site. Additional equipment may be required, e.g. to remove contaminated soil. No external support personnel or resources typically required.	

3.1 Severity Assessment and Assigning Tier levels

The severity assessment takes into account more than just spill volume and size of the impact area. It includes many of the factors which could result in the spill having greater social, environmental or economic consequences, and potential impacts on business reputation or operations.

Factors to consider when assigning Tier levels include:

- Potential for further spillage.
- Type of spill and its characteristics, e.g. toxic/hazardous vapour, gas, rate of evaporation & persistence of the oil in the environment.
- Effectiveness of immediate action to stop the spill continuing and to contain at source.
- Potential for spill to move or effect areas off-site?
- Daylight hours remaining until nightfall.
- Weather conditions will play a major part in the technical decision-making and could mean that response operations are more complex, or expensive, or take longer to complete.
- Other difficulties associated with the incident, e.g. fire, injuries (Medivac), emergency shut-down or stopping of operations, evacuation of site, well capping / relief well.
- Equipment and resources available and speed of deployment.
- Location of the spill. The location of the spill may be difficult to reach, or could involve complex logistics, or may pose safety risks for responders.
- Potential for impacts to nearby sensitive environmental areas (e.g. waterways).
- Attention from the media or public.
- Possible effects on people, landholders, businesses and communities located nearby.

4 SPILL RESPONSE PLANNING

4.1 Initial Site Survey

All Senex sites are surveyed prior to project commencement during the Environmental Assessment process. The Environmental Assessment completed for a site will provide relevant information that may support spill response activities. This information includes:

- Soil type;
- Details of any drainage or waterways present in the lease area or in the vicinity;
- Landholder or other infrastructure located nearby; and
- Environmentally sensitive areas.

4.2 Storage of Oil, Fuel and Chemicals

In order to minimise the risk of spillage Senex will ensure that all hazardous materials are transported, stored and handled in accordance with AS1940, Australian Dangerous Good Code and EPA guidelines. Bulk fuel tanks stored outside bunded areas must be contained within a self-bunded (double skinned) tank with safety valves.

The requirements for managing hazardous substance and dangerous goods at Senex sites are outlined in *Senex Hazardous Substances and Dangerous Goods Procedure (SENEX-CORP-HS-PRC-010).*

4.3 Personal Protective Equipment (PPE)

Provision and use of PPE during response operations will be strictly in accordance with the Senex *Personal Protective Equipment Procedure (Senex-Corp-HS-PRC-12)*. Supervisors/Emergency Response Manager will ensure that all personnel involved in response activities are adequately trained in the proper use, limitations, and care of the PPE equipment provided.

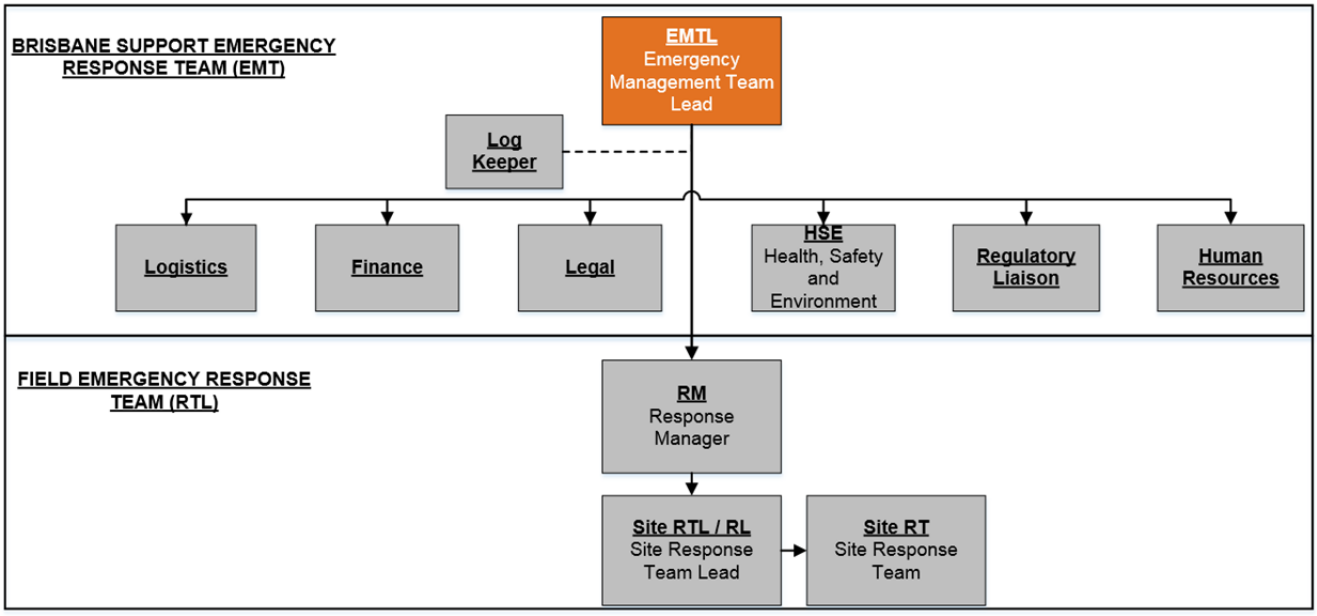
- Appropriate hearing protection will be worn during helicopter transport and cargo handling operations, and when operating mechanical equipment with high noise levels
- Proper protective clothing and other appropriate protective equipment will be worn when performing work involving the handling of highly volatile products; and
- Prolonged skin contact with crude oil can lead to skin rash. Provisions will be made to practice proper industrial hygiene.

5 SPILL RESPONSE STRUCTURE

The Senex response structure and support arrangements will depend on severity of the event but for Tier 1 and 2 events will typically consist of two distinct parts:

1. Field response led by the Response Team Leader (RTL), managed by the Response Manager (RM), with a team assembled based on resources available and the nature/severity of the spill; and
2. Corporate support led by the Emergency Management Team Leader (EMTL) with a team assembled to suit the support required by the RTL and RM.

Figure 2: Senex Emergency Response Structure (SENEX-CORP-ER-CHA-001 – Revision 2)



5.1 Roles and Responsibilities

The following section outlines the roles for key members of the spill response team and duties to be performed by each member of the response team in the event of a spill.

Table 1: Spill Response Key Roles

ROLE	ACRONYM	DESCRIPTION
Response Team Leader (site)	RTL	Command & control of the onsite response (Site or Project Supervisor). Ensure appropriate resources and site personnel are available to support and manage spill.
Response Manager (site)	RM	Overall management of wider response for the site/field (Field Superintendent). RM controls the wider response including co-ordination and provision of additional support to resolve the issue. Activate field Response Team. Monitor the situation and assess potential impacts. Maintain communication with EMTL, RTL and RL.
Response Liaison (site)	RL	Senex Representative (OCR) or Project Supervisor onsite at contractor-managed site. RL is responsible for maintaining communication with Contractor representative, RM and EMTL.
Emergency Management Team Lead (Brisbane)	EMTL	Activation and overall management of the Emergency Management Team. Direct support to RM. Identify and assess the potential impacts of the situation and provide strategic support throughout the event. Ensure appropriate resources and personnel are available to support and manage event. Advises COO of the situation and maintains regular contact. Monitor the situation and initiate an escalation to crisis level if required.

6 PERSONNEL HEALTH AND SAFETY

A risk assessment shall be conducted to develop incident-specific HSE requirements for spill control and response operations when determined necessary by the Senex Site Supervisor / OCR, typically for Tier 2 and Tier 3 spills requiring mobilisation of off-site assistance.

In coordinating a spill response Senex will at all times work within the requirements and intent of the Senex HSE Management System. Senex considers that no spill incident is of such a serious or urgent nature that spill response personnel will be exposed to situations that risk their health and safety.

7 SPILL RESPONSE ACTIVATION PATHWAY

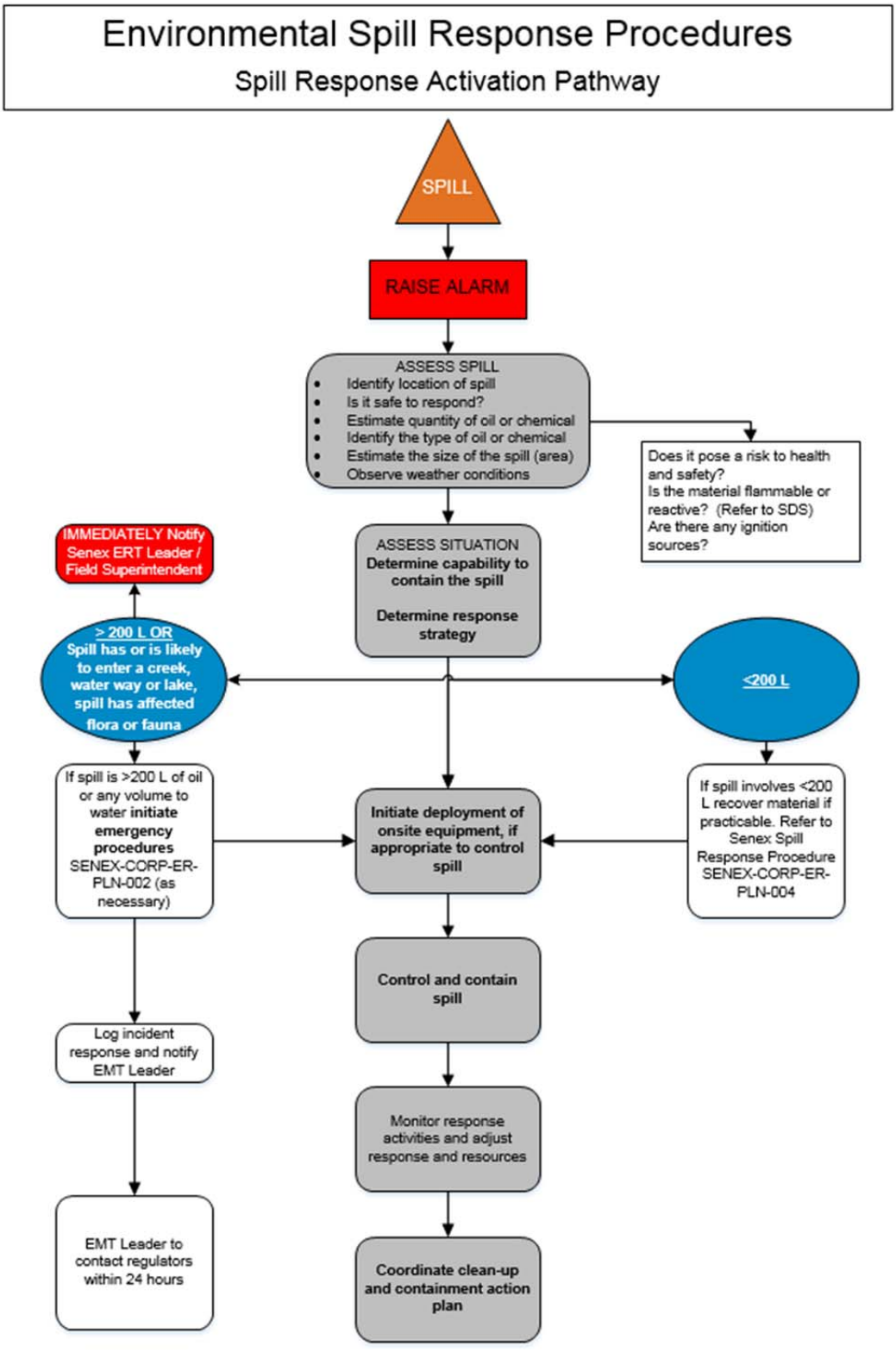


Figure 3: Senex Emergency Activation Pathway

8 SPILL CLEAN-UP AND TREATMENT OPTIONS

Implementation of the spill response clean-up and subsequent remedial action is to be undertaken in accordance with the *National Environmental Protection (Assessment of Site Contamination) Measure 1999* amended in 2013 and any relevant State regulatory requirements or guidelines.

Dependent on the type, size and characteristics of any spill or leak, response actions and subsequent treatment options typically employ a combination of some or all of the following techniques:

- Isolation;
- Natural recovery;
- Absorbents;
- Manual clean-up;
- Mechanical clean-up; and
- Pumps and vacuums.

8.1 Isolation

Depending on the size, location and nature of the spill event it may be necessary to isolate the area including removing all personnel in the immediate vicinity of the spill or leak or personnel not required for spill response. It may also be necessary to divert all vehicles and pedestrian traffic away from the spill or leak area and where required install a barricade /exclusion zone around the spill area.

8.2 Hazards

In the event of a chemical spill the product Safety Data Sheet (SDS) must be consulted prior to commencement of any response action. Spill response will be conducted as per the recommendations of the SDS regarding: Accidental Release Measures, Handling and Storage and Exposure Controls / Personal Protective Equipment. During containment and clean-up phases it is important to ensure clean-up team are protected by wearing appropriate PPE at all times while handling spilt material.

8.3 Natural Recovery

Natural recovery uses the natural degradation and weathering processes to breakdown and remove hydrocarbons. Typically natural recovery will be employed where direct intervention may result in greater impacts to the environment than those caused by the presence of hydrocarbon, where there is no proven, effective method for clean-up or where the location is inaccessible and may pose a safety risk to the clean-up team. Effectively, this method means that no direct action is taken other than to monitor the rate of recovery. Natural recovery may not be appropriate in some areas or circumstances and advice should be sought from the Senex Environment Team.

8.4 Absorbents

Absorbents can be used to collect hydrocarbons and the effectiveness of this technique depends on the capacity of the particular absorbent material employed. Absorbents are designed for the clean-up of minor to moderate spills in a localised area.

Where practical, absorbents may be used as a secondary treatment method after bulk hydrocarbon removal techniques have been employed.

8.5 Manual Clean-up

Manual clean-up involves the removal of contaminated material (i.e. soil) ready for offsite treatment or disposal. This technique is suitable for small volume spills in a localised area where the contaminated material can be easily removed.

8.6 Mechanical Clean-up

Mechanical clean-up involves the removal of contaminated material (i.e. soil) using heavy machinery or equipment ready for offsite treatment or disposal. Contaminated material is removed using excavation equipment such as graders, bulldozers and backhoes. In the event of a large volume spill a staging area for disposal may be required prior to material being transported offsite.

Contaminated soil is only to be removed to the depth of hydrocarbon penetration and excessive soil removal is to be avoided. Heavy equipment is to be managed to minimise potential impacts to sensitive areas (e.g. dunes).

8.7 Pumps and Vacuums

Pumps and vacuums can be used to remove hydrocarbons pooled on the surface or in bunded areas. Equipment can range from small portable units to large vacuum trucks.

8.8 Waste Management

Collected hydrocarbons, chemicals, contaminated waste materials generated during the spill clean-up are to be contained in appropriate receptacles at all times. The waste materials are to be securely transported, tracked and disposed of at appropriate facilities. For chemicals the SDS is to be referred to for information on appropriate handling and transport.

Spill response activities will adopt the waste hierarchy strategy by reducing, re-using, recycling, treating and recovery waste where practicable.

- Close off source of spill/leak;
- Containment;
- Collection;
- Treatment;
- Restoration / Rehabilitation.

9 SPILL RESPONSE RESOURCES

Senex will maintain sufficient equipment to ensure that the response strategies outlined in this procedure can be rapidly and effectively implemented in the event of a spill.

The following equipment items are to be on location at all times to assist with clean-up and containment operations that may be required:

- Basic Oil and Fuel Spill Kit (containing absorbent material and pads, cable ties, gloves, plastic bags)
- PPE and Self-contained breathing apparatus (SCBA)
- Shovels;
- Containers (e.g. empty IBC) for collection of soil
- Plastic pit liners;

In addition, identification of relevant equipment which may be required in a major containment operation and which could be mobilised to site within 8 hours is to be identified prior to operations commencing:

- Graders, bulldozers and/or scrapers;
- Water tankers, suction tankers and/or trucks;
- Portable storage tanks etc.

9.1 Spill Response Equipment

Emergency equipment shall be positioned in appropriate locations at each work site or be located in a position where it is readily available to the site and maintained in a serviceable condition. Appropriate emergency equipment is to be identified commensurate with the risk of the activity being conducted and could include, but is not limited to the following:

- Spill Response Trailer (if available);
- Emergency response instruction folders;
- First aid equipment;
- Fire extinguishers;
- Stretcher(s);
- Oil and chemical spill kits; and
- Safety Showers/eyewash stations.

Where applicable, sites are to be equipped with gas detection and fire extinguishing equipment in accordance with the relevant fire codes and legislation. Other portable equipment such as gas detectors and self-contained breathing apparatus are to be available as required.

9.2 Designation of Response Rooms

A designated room for managing Spill Response events in the field and Brisbane office may be required to be set up to provide a central point of contact.

The onsite room will be:

- In a safe location not endangered by the situation; and
- Contain all associated communication equipment and facilities, such as procedures, contact lists, phones, data points, event board, documentation, and other equipment

10 COMMUNICATIONS

In an emergency situation, communications should adhere to the following general guidelines:

- Be clear, brief and factual;
- Keep a log of all calls made concerning the emergency situation using the Senex Telephone Log Sheet (SENEX-CORP-ER-FRM-003_0);
- All office originated communications should be by telephone. Do not depend on email to transmit vital information. If email is used, follow up must be made by phone; and
- Telephone contacts lists can be found at: http://intranet.sen.local/Pages/staffdirectory.aspx?k=FirstName:A

11 REPORTING REQUIREMENTS – SA AND QLD

Senex requires that all incidents including spills are reported and fully investigated in accordance with their specific level of potential risk.

The Senex *Incident Reporting and Investigation Procedure* (SENEX-CORP-HS-PRC-004_3) and the Senex *Incident Classification and Reporting Requirements Chart* (SENEX-CORP-EN-CHA-001) defines the process for the investigation and reporting of incidents and ensures that Senex meets all regulatory notification requirements.

The Senex Environment Manager, in consultation with the Chief Operating Officer, is responsible for determining whether an incident is notifiable and for reporting incidents and accidents to the appropriate regulator.

12 END OF SPILL RESPONSE

12.1 Declaring End of Response

The Senex Response Manager or Emergency Management Team Leader, where activated, will declare the response is over when:

- Senex Operation and/or supporting facilities have been returned to a safe operational condition;
- All contaminated material and waste have been collected; and
- All authorities, organisations and/or support services contacted during the spill event have been advised the response is complete.

12.2 End of Response Checklist

Table 2: End of Response Actions

End of Response Actions	
1. Ongoing resources for post spill recovery (if required) in place	
2. Final information release and/or notification to some, or all, of the following:	
a. All relevant response and support personnel	d. All relevant EMT and support personnel
b. Contractor organisations	e. Regulatory authorities (DSD, Safework)
c. Relevant Stakeholders (landholders)	f. Environmental agencies (DEHP, EPA)
3. Debrief of all personnel (including any personnel currently relieved or stood down)	
4. Ensure waste materials have been securely transported for disposal at appropriate facilities	
5. Ensure validation sampling has been completed	
6. Compile and file all documents relating to the response	
7. Arrange for full incident investigation and analysis	
8. Approve/comment on incident debriefing reports and recommended actions	

APPENDIX 1: SPILL RESPONSE ACTION PLANS

A.1 Initial Control Action Plan

Step	Assess the Spill
1	Identify the material that has leaked or been spilt: • Does it pose a risk to health and safety? Refer to the appropriate SDS • Is the material hydrocarbon or a chemical? • Is the material flammable or reactive?
2	Note details on site or location of the spill and assess: • If relevant, are there any ignition sources? • Does the spill pose a threat to personnel, people, or the environment?
3	Assess and determine action plan to contain and control the spill of safe to do so.
4	Notify all relevant Senex personnel (e.g. site supervisor, environmental manager)

A.2 Spill Response Action Plan

Step	Control the Spill	
1	**Control the Cause of the Leak:**	
	Potential source and scenario Container leak	Possible measure to stop or control the spill: • Turn the container over to prevent further leakage • Move the container to a bunded and safe location (if not already in bunded area) • Apply a temporary patch/plug if possible
	Pipe/flowline leak	• Shut down pipeline/flowline above and below failure point • Close pipe or other valves • Isolate flow of gas or liquids to the source • Refer to Pipeline Trunkline or Flowline Incident Checklist for detailed information (SENEX-CORP-ER-CHK-012) http://intranet.sen.local/dc/Documents/SENEX-CORP-ER-CHK-012.pdf
	Rupture of tank	• Transfer contents from damaged tank to undamaged tank • If not in bunded area, move, implement or construct bunding to contain spill • Apply a temporary patch / plug if possible
	Loss of Well Control	• Emergency shutdown • Regain control of the well through mechanical means as necessary • Follow Well Control Notification Pathway (SENEX-CORP-ER-FLO-004) http://intranet.sen.local/dc/Documents/SENEX-CORP-ER-FLO-004.pdf
2	**Clear the area around the spill** • Advise all personnel in the immediate vicinity of the spill or leak; remove any personnel not required for spill response. • Divert all vehicles and pedestrian traffic away from the spill or leak area.	

	• If required barricade /exclusion zone around the spill area
3	**Stop the spread of the spill** • Make sure spilled material does not enter waterways, drains, sensitive environmental areas or private land (off lease), public areas. • Use absorbent material to surround and control the spill. • Construct temporary or earthen bunds if practicable and where required

A.3 Clean-up Action Plan

<table>
<tr><th>Step</th><th>Action</th></tr>
<tr><td>1</td><td>Use absorbent materials to absorb as much liquid as possible.</td></tr>
<tr><td>2</td><td>If it is a large volume spill, decide if additional equipment or resources is required e.g. vacuum truck, earthmoving equipment.</td></tr>
<tr><td>3</td><td>For large volume spills or hazardous materials notify Senex HS&E Team for advice on clean-up and any regulatory notification or approvals required</td></tr>
<tr><td>4</td><td>Remove all contaminated material (e.g. soil) to the depth of spill penetration</td></tr>
<tr><td>5</td><td>Dispose of recovered contaminated soil and waste materials via a licensed regulated waste transporter as outlined below:
<table>
<tr><th>Type of Chemical or Spill</th><th>Disposal Method</th></tr>
<tr><td>Fuel, hydrocarbons, chemicals, absorbent materials, contaminated soil</td><td>Place into IBCs or 205L drums, skip bins or lined and bunded storage area.
Refer to SDS for appropriate storage and disposal of chemicals.</td></tr>
<tr><td>Large volumes that have been recovered by vacuum truck</td><td>Hydrocarbon spill material is to be collected and held on site for transport</td></tr>
<tr><td>All containers that have been used to store contaminated waste</td><td>Temporary storage in a bunded area as approved by Site Supervisor until waste can be transported offsite for disposal</td></tr>
</table>
If unsure about appropriate disposal options contact the Senex HS&E Team</td></tr>
<tr><td>6</td><td>Validation sampling will be completed by the HS&E Team to determine that the site is no longer contaminated</td></tr>
</table>