

COMMUNICATION PLAN

EXPLORATION DRILLING PROGRAM CHUKCHI SEA, ALASKA

The following Communication Plan will be used during each exploration drilling season to coordinate activities with local subsistence users, including the Alaska Eskimo Whaling Commission (AEWC), Eskimo Walrus Commission (EWC), Alaska Nanuuq Commission (ANC), Alaska Beluga Whale Committee (ABWC), Ice Seal Committee (ISC), and village Whaling Captains Associations (WCA). Each planned drilling season in the Chukchi Sea will begin with transit through the Bering Strait into the Chukchi Sea on or about July 1, then on location at a drill site on or about July 4 and end on or about October 31.¹

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 Gulf of Mexico Inc. (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 beluga and bowhead whale migrations 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 (POC), Marine Mammal Protection Act (MMPA) authorizations issued by the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) and Lease Stipulation #5 from Chukchi Sea lease sale 193 per the Bureau of Ocean Energy Management (BOEM).

PHASE I

- Shell will fund the operation of Communication and Call Centers (Com Centers) in the coastal villages to enable communications between Shell operations and vessels, local subsistence users, and Subsistence Advisors (SA), thereby notifying the subsistence community of any vessel transit route changes and avoiding conflicts with subsistence activities.
- Protected Species Observers (PSO) 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 Com Centers and local subsistence hunters by marine radio.
- If a conflict arises with offshore activities, the PSO 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 will employ local SAs from the Chukchi Sea villages that may be potentially impacted by Shell's exploration drilling activities. The SAs will provide consultation and guidance regarding whale migration and subsistence activities. There will be one SA per village, working

¹ As noted in the EP Revision 2, Shell may request permission to transit through the Bering Strait prior to July 1, 2015.

approximately 8 hours per day and 40 hours per week during each drilling season. The subsistence advisors will use local knowledge (Traditional Knowledge) to gather data on subsistence lifestyle within the community and provide advice on ways to minimize and mitigate potential negative impacts to subsistence resources during each drilling season. Responsibilities will include reporting any subsistence concerns or conflicts, coordinating with subsistence users, reporting subsistence related comments, concerns, and information, coordinating with the Com and Call Center personnel, and advising on how to avoid subsistence conflicts.

- Aircraft traffic will not fly below 1,500 ft. (457 m) altitude (except during takeoffs and landings, in emergency situations or for PSO overflights) while over land or sea. If flights need to deviate from their routine planned routes due to an emergency, weather or other unavoidable reasons, the new flight information will be shared as outlined by Shell's Health, Safety, Security, and Environment (HSSE) 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.

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, EWC, ANC, ABWC, ISC, and the WCAs of Barrow, Wainwright, Point Lay and Point Hope once transiting of vessels begins through the Chukchi Sea, during drilling activities, and during mobilization from the Chukchi Sea.