



NATIONAL OIL SPILL CONTINGENCY PLAN

(NOSCP)

for

NIGERIA

REVISED 2010

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FOREWORD

The National Oil Spill Contingency Plan (NOSCP) is an important document that signals the Federal Government's determination to tackle oil spill incidents and the associated environmental problems in the Nigeria. The document was compiled by experienced individuals using the international standards presented by conventions such as OPRC 90 which Nigeria has ratified.

The NOSCP is an elaborate document in which all the human and material resources required to fight oil spill in Nigeria are highlighted. It has also established links with the various foreign organizations that can be called upon in cases where internal resources are inadequate to combat the magnitude of oil spill that has occurred. The document clearly assigns roles to the relevant Government organisations such as the Police, Military, Ministry of Health, NEMA e.t.c in the event of emergency of oil spill management.

The establishment of National Oil Spill Detection and Response Agency (NOSDRA) as the lead Agency in oil spill management in Nigeria, shows the commitment of the Federal Government to implement the NOSCP vigorously. Such an institutional framework for the implementation of NOSCP is also part of the recommendations of the OPRC 90 which makes it possible for Nigeria to key into the West, Central and Southern Africa oil spill management system.

It is noteworthy that efforts to compile a NOSCP for Nigeria had started as far back as 1993 when a committee of stakeholders started work on the document. Although the work was inconclusive, the data gathered were partly used to carry the assignment to its logical conclusion as we have it today.

NOSCP is a living document that is expected to remain evergreen. As such a periodic review of the document is quite imperative such that the information therein are updated to make it very effective and useful. For example, there must be constant updating of contact persons in various organisations as they move from their positions and locations from time to time. Other important information like Environmental Sensitivity Index (ESI) map, tidal information and the likes must also be updated accordingly. I give the assurance that the Federal Government is highly committed to keeping this important document evergreen to reflect its determination to protect the nation's environmental treasures for current and future generation of Nigerians.

John Ogar Odey

Honourable Minister for Environment

March 2011

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It is proper to begin by acknowledging the special grace of Almighty God who through the installation of a new era of democratic good governance in Nigeria made it possible for this very important document to come into existence. It is especially commendable to note the support of the Honourable Minister of Environment Mr. John Odey to provide the reliable baseline for the successful exercise leading to this reviewed version of the NOSCP 2010.

His Excellence Chief Olusegun Obasanjo the former President and Commander in Chief of the Armed forces, Federal Republic of Nigeria and Chief (Dr) Imeh T. Okopido the Former Honourable Minister of State deserve special mention for their contributions to the success of this document.

Added to this, most of the data and information contained in this document, were obtained through the indefatigable efforts of an earlier committee in 1993 under the distinguished leadership of Dr. Jerry Nwankwo – Ministry of Petroleum Resources (Department of Petroleum Resources) and Co-chairman National Oil Spill Contingency Planning Committee, Chief Emmanuel C. Odogwu – Shell Petroleum Development Company, OPTS representatives, and Chairman Plan Writing Team, and Mr. D. O. Irrechukwu – Department of Petroleum Resources, as the Secretary. The other co-chairman

even though for a brief period was Navy Captain J. Abulu who had to leave following his appointment as the Military Administrator of Anambra State in 1991. It is thus noteworthy to recognize and put on record that a high percentage of information and data contained in this earlier drafts NOSCP (1993) and (1997) were obtained during field visits by members of that Planning Committee and Writing Team to the oil producing areas in Nigeria and oversea trips to several countries in Europe, North America, South America and South East Asia. The committee was immensely grateful to the Oil Producers' Trade Section (OPTS) of the Lagos Chamber of Commerce and Industry for not only sponsoring the oversea trips but also providing the funds for writing and publishing the document. Mention must also be made of the extra funding provided by Shell Petroleum Development Company of Nigeria Limited (SPDC), Alba (Nigeria) Limited, the Nigerian National Petroleum Corporation (NNPC) and the Federal Military Government through the National Committee on Ecological Problems (NCEP).

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In addition to the then NOSCP Committee, the underlisted Ministries, Departments and Organisations also contributed to the preparation of this document.

- The Ministry of Petroleum and Mineral Resources (DPR) – Focal part and Co-chairman
- The Nigerian Navy – Co-chairman
- The Navy
- The Airforce
- The Police
- National Emergency Relief Agency
- The Federal Environment Protection Agency
- The Institute of Oceanography and Marine Research

- The Oil Producers' Trade Section of the Lagos Chamber of Commerce & Industry (OPTS)
- The Clean Nigeria Associates (CNA)
- The Department of Meteorology
- The Nigeria Ports Plc
- Federal Department of Fisheries
- National Oil and Chemical Marketing Company (NOLCHEM)
- Nigerian Maritime Authority
- Federal Ministry of Agriculture, Water Resources and Rural Development

When reflecting on ascribing honour and recognition to deserving individuals and corporate organizations that have played significant roles in the production of this final draft document on NOSCP, the role of the members of the Sub-committee on the Oil Spill Response under the Chairmanship of Dr. V. A. Fodeke (FMEnv), co-chaired by Mr. Tony Ogbondu (SPDC) and the Secretary, Mr. D. A. Gidado (FMEnv) readily come to mind.

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The NOSDRA In-house Review Committee is gratefully acknowledged. The members of the Committee include:

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Acronyms and Abbreviations

1. AOSOC - Airborne Oil Spill Operations Command
2. API - American Petroleum Institute
3. APPA - African Petroleum Producers Association
4. CNA - Clean Nigeria Associates
5. DPR - Department of Petroleum Resources
6. EEZ - Exclusive Economic Zone
7. ESI - Environmental Sensitivity Index
8. ETD - Engineering and Technology Division (of the NNPC)
9. FGN - Federal Government of Nigeria
10. FME - Federal Ministry of Environment
11. GDP - Gross Domestic Product
12. GIS - Geographic Information System
13. GNP - Gross National Product
14. ICC - Incident Command System
15. IMO - International Maritime Organization
16. ITCZ - Inter-Tropical Convergence Zone
17. ITD - Inter-Tropical Discontinuity
18. LG - Local Government
19. LGA - Local Government Area
20. MOSOC - Marine Oil Spill Operations Command
21. MT - Motorized Tanker
22. NAPIMS - National Petroleum Investments and Management Services
23. NC - National Commander
24. NCRC - National Control and Response Centre
25. NGO - Non-Governmental Organization
26. NIOMR - Nigerian Institution for Oceanography and Marine Research
27. NNPC - Nigerian National Petroleum Corporation
28. NOSCP - National Oil Spill Contingency Plan
29. NOSDRA - National Oil Spill Detection and Response Agency
30. NOSRGB - National Oil Spill Response Governing Board
31. NP Plc - Nigerian Ports Public Limited Company

32.	OPEC	-	Organization of Petroleum Exporting Countries
33.	OPRC	-	International Convention on Oil Pollution Preparedness, Response and Co-operation
34.	OPTS	-	Oil Producers Trade Section (Lagos Chamber of Commerce)
35.	OSC	-	On-Scene Commander
36.	OSRL	-	Oil Spill Response Limited – Southampton
37.	QIT	-	Qua Iboe Terminal
38.	SBM	-	Single Buoy Mooring
39.	UK	-	United Kingdom
40.	ZC	-	Zonal Commander
41.	ZCCRC	-	Zonal Command and Control Response Centre
42.	ZCCU	-	Zonal Command and Control Unit
43.	ZRO	-	Zonal Response Organization
44.	ZOSRC	-	Zonal Oil Spill Response Committee
45.	ZOSRO	-	Zonal Oil Spill Response Organization
46.	ZOSRAC	-	Zonal Oil Spill Response Advisory Committee

DOCUMENT NOTE

For the purpose of the National Oil Spill Contingency Plan (NOSCP):

- i. the National Commander shall be the Director General/Chief Executive Officer (NOSDRA);
- ii. the Zonal Commander shall be the Zonal Director/Head (NOSDRA) of the zone within which the incident occurs;
- iii. the On-Scene Commander shall be any officer authorized by NOSDRA at the time of the incident.

2.0 NATIONAL BACKGROUND

- 2.1 This Plan defines the role of Government in respect of its responsibility as the environmental conscience of the Nation regarding all spillages of oil, whether accidental or deliberate, from whatever source and of whatever size, which threaten the Nigerian environment.
- 2.2 Such oil pollution is most likely the consequence of petroleum activities, such as exploration, production, refining and transportation including marine vessels and pipelines and petroleum handling facilities, namely depots, pump stations, terminals, ports and jetties.
- 2.3 In order to mitigate the adverse effect of oil pollution arising from any spillages on the environment and the health of the people, the government recognizes three levels of oil spill contingency planning for the petroleum industry, namely:
- (i) Company plans - Tier One
 - (ii) Cooperative plan – Tier Two
 - (iii) Government plan for major or disastrous oil spills – Tier Three
- 2.4 While the Tier One or company plan is mandatory for each producing and marketing company, Tier Two (the cooperative plan or Clean Nigeria Associates (CNA)), was formed by the producing companies to assist member companies in handling oil spillage cases that an individual company is unable to combat. The

Government plan, embodied in the National Plan, represents the Tier Three plan which provides for a response capability to major or disastrous oil pollution which is beyond the individual oil company's Tier One response, and the cooperative Tier Two response capabilities.

- 2.5 The National Plan, as a matter of government policy, integrates these three Tiers of contingency planning thereby providing the necessary organizational structure, command and control, communication network and information service to ensure that Government can be kept fully informed of any spill occurrence, monitor the spill response and intervene when required so as to cope with all spills which threaten the Nigerian environment.
- 2.6 Furthermore, the International Convention on Oil Pollution Preparedness, Response and Co-operation (OPRC), 1990, which Nigeria has ratified focuses squarely on the responsibility of member states to establish a National system or plan for responding promptly and effectively to oil pollution incidents.
- 2.7 Finally, the National Plan will not only help in the effective combat of major oil pollution for the preservation of our environment, but also provide the required access to international co-operation in oil pollution preparedness and response.

3.0 THE THREAT - ASSESSMENT OF SPILL RISK

3.0.1 Petroleum activities span the length and breadth of Nigeria. The activities include seismic, exploration, production, storage, and transportation by ocean-going vessels and pipelines, and processing. The activities vary in intensity in different areas but, they are concentrated mainly in the Niger Delta, which is considered environmentally very sensitive to oil spills in view of the complexity of its ecological setting and endowment. All of the crude petroleum is transported via pipelines to storage depots/terminals within the Niger Delta and areas contiguous to it. There are seven terminals out of which five are located along the coastline. These include the Bonny, Forcados, Qua Iboe, Escravos, and Brass terminals. The other two are Oloibiri and Antan terminals, both of which are located off the shoreline – on the Atlantic Ocean. Each of these seven terminals has one or more loading points (single buoy moorings – SBMs) where large capacity ocean-going vessels moor to load.

3.0.2 The nominal storage capacities of these terminals are as follows:

Forcados	5,700,000.00	barrels
Brass	3,258,000.00	“
Bonga FPSO	1,850,000.00	“
Sea Eagle FPSO	1,400,000.00	“
Bonny Terminal	7,500,000.00	“
Escravos	3,600,000.00	“
Qua Iboe Terminal (QIT)	6,457,000.00	“ (Crude Oil)
Qua Iboe Terminal (QIT)	1,956,000.00	“ (Condensate)

*Oloibiri	2,000,000.00	“
*Antan	1,700,000.00	“
Gulf of Guinea (Offshore)	1,200,000.00	“
Yoyo FPSO	2,000,000.00	“
Erha FPSO	2,200,000.00	“

**Floating storages located on the Atlantic Ocean*

3.0.3 The actual storage at any time in these terminals averages above 65%. On the average, between 65 to 100 or more vessels of average capacity of 750,000 barrels visit the shores of Nigeria to load crude petroleum in one month. The pipelines through which crude oil is transported from various gathering points to the respective terminals, and from the individual terminals to the SBMs sum up to several hundreds of kilometers in length, and criss-cross the maze of creeks and coastal areas of the Niger Delta. (See ANNEX 2 – CRUDE OIL AND PETROLEUM PRODUCT PIPELINE MAP OF NIGERIA).

3.0.4 There are about 1,665 producing wells and 616 wells capable of producing in Nigeria. Most of these wells are concentrated within the Niger Delta and the Contiguous area (including the coastal areas). Of the producing wells 1045 are located within the land/swamp area of the Delta while 620 are offshore. The risks that are associated with the facilities described above would primarily be oil spillage due to:

- Tank failure in any of the terminals.
- Rupture of major delivery lines.
- Tanker accident within the Nigerian waters.
- Oil well blowout.

- Marketing of refined products
- Human error
- Sabotage

3.0.5 The magnitude of any such spill would depend on the nature of the incident, but would certainly necessitate the activation of the National Plan.

3.1 Refineries and Depots

3.1.1 Two of the three Refineries (Warri Refinery, old and new Port Harcourt Refineries) are located in the Delta region or within the area contiguous to the Delta (Warri and Port Harcourt) and the third, in the hinterland (Kaduna). The refineries are supplied with crude oil through pipelines, the longest being the Escravos-Kaduna pipeline. From the refineries, refined products are distributed to all parts of the country by a network of pipelines and storage depots, (See ANNEX 2 and 3 – CRUDE OIL AND PETROLEUM PRODUCTS PIPELINES MAP OF NIGERIA as well as NATIONWIDE CRUDE OIL and PETROLEUM PRODUCTS TANKAGE PROFILES respectively).

3.1.2 In addition to this, a fleet of four vessels capable of holding one million metric tons of all grades of petroleum products is now stationed offshore within Nigerian territorial waters.

3.1.3 The risk of oil spillage exists therefore, at all areas where these activities are carried out, with the higher potentials in areas of concentrated activities.

3.2 Frequency and Anticipated Size of Spills

3.2.1 While the global frequency of very large spills is fortunately relatively low, the risks are ever present and the time, place and cause unpredictable. However, the threshold of risk must be higher at focal points of related activity and it is here that response capability should be focused.

3.2.2 There have been large scale spills due to tank failures, oil well blowouts, and pipeline and hose ruptures as well as third party interferences. These however, have been few and far between. Minor spills are more predominant as their frequency outnumber those of the larger ones.

4.0 NATIONAL POLICY

- 4.1 The Government of the Federal Republic of Nigeria recognizes the need to put in place an effective and tested crisis management capability through the National Oil Spill Contingency Plan. This is in compliance with National objective and the International Convention on Oil Pollution Preparedness, Response and Co-operation (OPRC 90 which Nigeria has ratified).
- 4.2 The overall goal of the National Policy on Environment is to achieve sustainable development through the following:
- a) Securing for all Nigerians a quality of environment adequate for their health and well-being;
 - b) Conserving and using the natural resources for the benefit of the present and future generations;
 - c) Restoring, maintaining and enhancing the ecosystem and ecological processes essential for the preservation of biological diversity;
 - d) Raising public awareness and promoting understanding of the essential linkages between the environment and development, and;
 - e) Co-operating with other countries and international organizations to achieve (a) – (d) above and preventing transboundary environmental pollution.
- 4.3 In view of the above, the National Policy advocates that exploration and production activities should be carried out in an

environmentally sound manner with minimal disturbance to the natural environment where possible. Accordingly, sustainable exploitation strategies to be implemented nationally in the oil and gas sector will, amongst other things, seek to:

- a) ensure the implementation of the National Oil Spill Contingency Plan;
- b) prepare a National Plan of Action for Awareness Preparedness for Emergencies at the local Level;
- c) conduct spill modelling for all offshore developmental projects to enable proactive response to emergencies;
- d) carry out inventory of spill sites and conduct prompt clean-up;
- e) periodically inspect and ensure prompt maintenance of facilities as a proactive measure for prevention of oil spill;
- f) encourage all mineral exploitation operators to keep accurate records of crude oil and product spills as well as other accidents that impact environmental quality and report them promptly to the appropriate authorities;

4.4 OPRC 90 directs, amongst others, that:-

- Each party shall require that operations of offshore units under its jurisdiction have oil pollution emergency plans, which are coordinated with the national system established in accordance with article 6 and approved in accordance with procedures established by the competent national authority
- Each party shall require that authorities or operators in charge of such sea ports and oil handling facilities under its jurisdiction

as it deems appropriate have oil pollution emergency plans or similar arrangements which are coordinated with the national system established in accordance with article 6 and approved in accordance with procedures established by the competent national authority.

4.5 The strategy proposed for the implementation of the National Oil Spill Contingency Plan will describe the scope of the plan. This will contain:-

- The geographical coverage of the plan
- Anticipated Risk
- Hierarchy of Responsibilities
- Roles of Authorities (Government and Responsible Parties)

5.0 THE ROLE OF GOVERNMENT

- 5.1 This National Oil Spill Contingency Plan with its associated arrangements reflects the determination of Government to identify and to play its full and proper role in the increasing complex industrial and commercial activities involved in the development of Nigerian National Oil Assets.
- 5.2 The prime responsibility of Government in these activities is to ensure that the best is always expeditiously done to protect the national environment from damage, both short and long term, arising from improper practices and the effect of accidental spillages. The government is the custodian of the environment in Nigeria and this responsibility must always be held by government.
- 5.3 Accordingly, Government must be aware of all accidents and spillages in order that they may monitor the clean up and ensure that all is done that can sensibly be done. Government must also ensure that all oil companies have a proper plan in place and equipment and personnel available for speedy response either within their company or through a response co-operative. In the event of a major spill Government must be able to take charge and bring in additional equipment either from the national Tier 3 response organization or by international arrangement from outside the country.

5.4 The success of these arrangements is utterly dependent on there being a trusting and effective relationship maintained between Government and industry, encouraged at all levels by means of transparent management, frequent joint training and exercises and a unity of purpose embracing the commercial benefits of the marketing of oil and the need to ensure the minimum of damage to the Nigerian environment. This will always be a difficult balance in which government has the prime responsibility.

6.0 SCOPE AND COMPONENTS OF PLAN

6.1 IMPLEMENTATION OF THE NATIONAL PLAN

6.1.1 The National Oil Spill Detection and Response Agency (NOSDRA), is the institutional framework of the Federal Government of Nigeria responsible for the implementation of the National Oil Spill Contingency Plan (NOSCP) to ensure a safe, timely, effective and appropriate response to major or disastrous oil spill incidences in Nigeria.

6.2 Dimensions of the National Plan

6.2.1 Geographical Areas

The geographical area covered by the National Plan is the territory of the Federal Republic of Nigeria including the 200 nautical miles off the coast of the country i.e. the Exclusive Economic Zone (EEZ). In all cases of oil pollution within the territory, the National Plan will be activated into taking action, such as surveillance, reporting, alerting and other response activities. The geographical area covered by this plan is shown in the annotated map (ANNEX 4).

6.2.2 Petroleum Activities

The petroleum activities in Nigeria are concentrated in the Niger Delta and majority of accidental oil pollution is likely to occur in the ecologically sensitive environments of the Delta. Furthermore, there is a gradual expansion of seismic, exploration and production activities into other areas, such as the frontiers of the Chad Basin,

the Anambra Basin, the Benin Basin, and the Benue Trough and into the deep offshore areas of the Niger Delta. The activities of the petroleum industry that are potential sources of oil pollution include the upstream and downstream operations, such as, drilling and development activities, production and terminal operations, refining and petrochemical plants, blending plants, depots and retail outlets.

6.2.3 Also included are pipelines systems, ranging from the small flowlines to the biggest trunk lines that connect these operational facilities. Whilst most of oil spills arising from the above operations are small and can be handled at the local level by a company response, as the magnitude and severity of the spill increase from medium to major oil spill, the mechanism of combat efforts may escalate from cooperative or CNA response level to the National or even Regional/International response to a major spill. It is important to emphasize in this scope that the first and second levels of the contingency planning are part and parcel of the integrated National Plan. In other words, the National Plan is built on the maximum utilization of the available facilities and resources within the existing companies' and CNA.

6.3 Statutory Requirements, Relevant Agreements

6.3.1 Legal Authority

The authority for the issuance of this National Oil Spill Contingency Plan derives from:

- ❖ Petroleum Act No. 51, 1969 as amended. Section 8(1)(b) (iii)

- ❖ The Petroleum (Drilling and Production) Regulations, 1969, section 25.
- ❖ Government Administrative Directive (1981) for the Establishment of Three Levels of Oil Spill Contingency Plans (to effectively and promptly combat the various magnitude of pollution) namely; the Company plan, the Cooperative plan and the National Plan.
- ❖ Federal Executive Council Approval and Formation at its 17th Council Meeting of 6th October, 1988, of a National Committee comprising relevant ministries, departments and organizations for the Formulation of the National Oil Spill Contingency Plan.
- ❖ The Federal Environmental Protection Agency (FEPA) Act 58, 1988 (now repealed), section 22 & 23; and,
- ❖ International Convention on Oil Pollution Prevention, Preparedness, Response and Co-operation 1990 (OPRC 90)
- ❖ The National Policy on Environment which provides for the Establishment of a National Oil Spill Contingency Plan
- ❖ National Oil Spill Detection & Response Agency (NOSDRA) Establishment Act No. 15 of 2006.

6.4 Regional and International Cooperation

6.4.1 The Contingency Plan recognizes the need for cooperation among member states of the West African sub-region, especially our immediate neighbours in the Gulf of Guinea, for combating oil pollution in our contiguous waters. The plan supports IMO's strategy for the protection of the marine environment, and in particular will

seek to strengthen the capacity for national and regional action to **prevent, control, combat** and **mitigate marine pollution** and to promote technical cooperation. To this end, the Plan will also promote cooperation fully with other organizations within the United Nations and relevant international, regional and non-governmental organizations to ensure a coordinated approach to the problem and avoid wasteful duplication of efforts. Specifically this National Plan will request assistance such as advisory services, technical support and equipment in accordance with applicable bilateral and international agreements for the purpose of responding to an oil pollution incident. When the severity of such incident so justifies, the Government will ask the International Maritime Organization to assist in selecting sources of provisional financing of the costs of responding to the oil spill incident.

6.4.2 The Government could also take necessary legal or administrative measures to facilitate:

- The arrival and utilization in and departure from Nigeria of ships, aircraft and other modes of transport engaged in responding to an oil pollution incident or transporting personnel, cargoes, materials, and equipment required to deal with such an incident, and,
- The expeditious movement into, through, and out of Nigeria, of personnel, cargoes, materials and equipment.

6.4.3 Currently, Nigeria is a signatory to relevant International Agreements such as:

- ❖ 1969 International Convention on Civil Liability for Oil Pollution Damage.
- ❖ 1971 International Convention on the Establishment of International Fund for Compensation for Oil Pollution Damage.
- ❖ 1972 Convention on the Prevention of Marine Pollution by the Dumping of wastes and other matter (ratified in 1977).
- ❖ International Convention for the prevention of Pollution from ships, 1973, as modified by the protocol of 1978.
- ❖ Convention for cooperation in the Protection and Development of the Marine and Coastal Environment of the West and Central African Region (signed 23rd March, 1981).
- ❖ 1989 Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal (signed March 1990).
- ❖ 1990 International Convention on Oil Pollution Preparedness, Response and Cooperation (OPRC).

6.4.4 Article 6 of OPRC 90 further states:

Each party within its capabilities either individually or through bilateral or multilateral cooperation and, as appropriate, in cooperation with the oil and shipping industries, Port Authorities and other relevant entities should establish:

- (i) A minimum level of pre-positioned oil spill response equipment commensurate with the risk involved together with trained personnel for deploying and operating such equipment.
- (ii) A programme of exercise for oil pollution response organization and the training of relevant personnel.
- (iii) Detailed plans and communication capabilities for responding to an oil pollution incident.
- (iv) A mechanism or arrangement to coordinate the response to an oil pollution incident.

6.4.5 Where and if applicable, actions taken pursuant to this plan shall conform to the appropriate provisions of international cooperation protocols in any oil spill incident. This plan will form the basis for the preparation and implementation of regional and sub-regional plans for combating inter-boundary oil spills.

6.5 Physical and Geographical Coverage

6.5.1 Geographical Setting

Nigeria is a country of great variety of landforms, with an area of about 923,768km². Its population is about 140 million people. Nigeria comprises of seven relief regions based on land units as common landform assemblages: the creeks and lagoons, the Niger Delta, the coastal plains, the river basin troughs, the inselberg landscapes, the Chad basin and the eastern highlands. For purposes of this Plan, only the creeks and lagoons, and the Niger Delta are briefly described, because a greater percentage of petroleum activities in Nigeria take place within and around these unique regions.

6.5.2 The Creeks and Lagoons

The coastline of Nigeria is relatively straight except for the broad indented delta region separating the eastern and western segments. From the coastline to about 10-km inland is a strip of recently deposited sands, broken by a succession of east-west trending lagoons and swamps.

6.5.3 Deepwater Operations

Nigeria has continued to experience rapid growth in oil and gas operations. Most of the oil and gas operations take place in the hinterland of the Niger Delta region and the shallow waters. In recent years however, oil activities have expanded to the deep waters. The Plan therefore takes cognizance of the associated oil pollution risk that may impact the Nigerian territorial waters and the West African Sub-regional boundaries.

6.5.4 The Niger Delta

The delta which is formed as a result of the depositional processes of the emptying of river Niger into the Atlantic Ocean in the Gulf of Guinea is a very important region in the world. Situated between latitude 3° 45'N and 7° 35'N, and within longitudinal limits from 5° E to 8° 50' E the Niger Delta is a region with abundant natural resources, the most important of which is petroleum.

6.5.4.1 Regional Geography of the Niger Delta

Like the other areas in the region to the north of the equator, the climate of the Niger Delta is determined by the influence of the tropical maritime (mT) air mass, the tropical continental (cT) air mass and the equatorial easterlies. The mT originates from the southern high-pressure belt located off the Namibian coast and it acquires moisture over the Atlantic Ocean as south easterly but crossing the Equator turning to south-westerly winds. Onshore however, its influence is modified by the cold water upwelling along the coast. The dry cT air mass also originates from the high-pressure belt over the Libyan Desert and so picks up little or no moisture along its path across the Sahara. These two air masses mT and cT meet along an incline surface known as the Intertropical Discontinuity (ITD).

The equatorial easterly is a rather erratic, cool air mass which flows in the upper atmosphere along the ITD. It descends occasionally to actively undercut the (mT) or the (cT) air mass to produce either line squalls (in the rainy season) or dust devils (in the dry season). The former can be accompanied by very violent winds gusting up to 90km per hour for brief periods. Rain falls mostly when an area is overlain by (mT), becoming dry when overlain by the (cT) air mass.

Rainfall is by far the most important climatic factor influencing the physical environment in the Niger delta region. The annual rainfall amounts in the Niger Delta region varies in a south to north orientation from above 3000 mm along the shoreline to 1800-2000

mm in the hinterland. More the 50% of the variability in rainfall of Nigeria occurs within this region alone thereby indicating the natural diversity of the region. The highest amounts of rainfall are however experienced in July every year while January is usually the driest month. The annual temperature within the region is however less variable with almost the entire area experiencing 26 °C to 27 °C on the average except the extreme south-western portions from Calabar which experiences 25 °C to 26 °C average air temperature annually. The temperature range in the Niger Delta is however expansive with annual maximum temperature of as high as 32 °C to 34 °C and minimum temperature of as low as 22 °C to 24 °C annually.

The soils of the entire region are mostly undifferentiated ferrisols and lithosols with riverine hydromorphic soils along the channels of the major rivers of the area. However, little patches of deep porous brown ferrallitic soils and sandy materials are found in Akwa-Ibom while reddish-yellow gravelly ferrallitic soils on crystalline acid rocks are also found in parts of Cross River.

The drainage and hydrology of the Niger Delta region is in fact one of the most extensive networks of streams and rivers in the world due to the numerous distributaries of the River Niger. The most prominent rivers of the region are however, the Osioma River, Ase River, Orashi River, Nun River, Kwa Iboe River, Cross River, and Calabar. In addition, there are notable creeks among the

numerous ones like, the Benin Creek, the Nikorogba Creek, the Apoi Creek, the Ikebiri Creek and the Seiviri Creek.

6.5.4.2 Regional Geology of the Niger Delta

The Gulf of Guinea is one of the most prolific hydrocarbon provinces of the world. Intensive exploration efforts over the last 35 years in and around the Niger Delta in particular has led to a succession of significant discoveries, notably the Bonga, Agbami/Ekoli and Akpo discoveries in Nigeria and Zafiro and Alba in Equatorial Guinea. However, the full potential of the continental slope and rise seaward of the shelf break is only recently becoming apparent, with a number of exploration programs having resulted in world-class discoveries being made in recent years.

The Niger Delta is a Paleocene to Recent, wave-dominated delta situated in the Gulf of Guinea. Following the Mesozoic rifting of the Atlantic, sedimentation began with Albian drift deposits. Sediments filled the Benue Trough and by Late Eocene time began to prograde across the existing continental slope into the deep sea. Continued seaward progradation since the Eocene has extended the continental margin to its present position.

Modern seismic data and improved models of sand distribution indicate that in places prospective acreage can extend up to 300 km from the present-day coastline of Nigeria. Extensive regional 2D and 3D multi-client seismic data shot by a number of seismic contractors provide a high quality regional dataset that has

enabled unprecedented insight into the tectono-stratigraphic evolution of the Niger Delta and especially the deep-water province. The total sedimentary prism, an area of some 140,000 km², has a maximum stratigraphic thickness of about 12 km.

The stratigraphy of the Niger Delta is divided into three diachronous units of Eocene to Recent age that form a major regressive cycle. The uppermost unit, the Benin Formation, comprises continental/fluvial and backswamp deposits up to 2500m thick. These are underlain by the Agbada Formation of paralic, brackish to marine, coastal and fluvio-marine deposits, organized into coarsening upwards 'offlap' cycles. The underlying Akata Formation, comprises up to 6500m of marine pro-delta clays. Shales of the Akata Formation are overpressured and have deformed in response to delta progradation. These shales facilitate regional decollement for updip extension and downdip compression. Shales of the Akata Formation constitute a world-class source rock. Deepwater turbidite sands also exist within this formation. This is diagrammatically shown in ANNEX 7.

Diapiric shale structures began forming by Late Miocene time in response to lateral shale withdrawal from beneath the advancing deltaic load, combined with compressional uplift and folding of pro-delta strata. During the Pliocene and Pleistocene time, these structures were buried by the prograding delta and extensional growth faulting commenced. Subsidence within the depobelts ceased episodically, at which time alluvial sands advanced rapidly

across the delta top, concurrent with a basinward shift in deposition and thereby creating seaward-stepping depocentres.

Extensive gravity tectonism has deformed sediments over the continental slope and the resulting folding, faulting and diapirism have created intraslope basins 10 to 25 km wide, filled with thick sequences of ponded sediments that represent a wide range of depositional processes. Submarine canyons cut across these deformed zones and give rise to aggradational channel/levee systems which are distributaries for large deep-sea fans. Transport and deposition of terrigenous sediments beyond the shelf have been accomplished mainly by turbidities and mass transport deposits (slumps, debris flows).

During periods of low sea-level, deltas migrated seaward to the shelf edge and large amounts of sediments were transported to the slope, rise and deep-sea fans by turbidity currents and related mass flows via submarine canyons. Turbidity flows were confined within deep levered channels on the upper and middle fan, but spread laterally outwards as sheet flows on the lower fan dispersing large amounts of coarse sediments across broad areas.

Zones of imbricate thrusts occur in the deep offshore Niger Delta. These compressive structures are typically situated seaward of the zone of shale structures on the upper slope separated by a relatively undeformed zone which exhibits minor thrusting and shale swelling.

The deep water Niger Delta hydrocarbon province encompasses a wide range of syn-depositional structural styles and deep-water sedimentary facies. The region can be broadly separated into four domains. These extend from the zone of shale diapirism on the present-day upper slope, basinward to a zone of relatively minor structuration, a frontal toe-thrust zone, and a zone of frontal deformation on the present-day lower slope and continental rise. (ANNEX 8 depicts the structural elements of the Niger Delta geology).

6.5.4.3 Regional Geomorphology

The delta of the River Niger is not formed in direct relation to marine processes. It is rather formed as a result of subaerial fluvial landscape processes due to the river mouth where its waters empty into the sea. The formation is as a result of decrease in transporting power of the sediment-laden flow of the lower course of the River Niger as it dissects the landscape in numerous directions due to the physiographic condition of the area. This decrease in transporting power resulted in the sediment deposition as shoal during the Quaternary Age form forming coastal plain sands and alluvium deposits. The shoal results in the bifurcation of the River Niger into two distributary channels near Aboh from where the delta builds up increasing in width.

Levees are formed from the deposition of the coarser suspended sediments flanking the channels into which the shoals have

subdivided the flow. The finer suspended sediment was also deposited on the flood basin and backswamp of the distributaries but a greater portion is carried seaward spreading out over the denser seawater to produce the extensive gently sloping submarine delta front in the Gulf of Guinea. Most of the characteristic features of a flood plain such as meander belts, swamps and associated levees are found in the deltaic plain of the Niger.

The change in gradient to 100 metres and below over the entire region is the marked break of gradient which results in the expansive swamp area and creeks with reduced standing water and wave action characteristic to deltaic fringe. Shallow bars of sand, silt and clay are deposited along the banks and the mouths of the distributaries with lagoons and mudflats forming another transitional zone between land and sea. In some parts of the Niger Delta, a line of sandy ridges or barrier lands form a discontinuous shoreline connecting the various distributary mouths.

To a large extent, the shape of a delta is determined by the complex interaction of river and seawater, especially their relative velocities, and the calibre of the materials brought down by the river. In the Niger Delta region, the influence of tides have created funnel shaped distributaries kept open and straight by strong tidal scour and stabilized by the growth of mangrove vegetation which characterizes the creeks in the region.

From geomorphological point of view, the Niger Delta extends from Forcados in the west to the Bonny River in the east, a distance of about 350 km, and from the apex of the delta at Aboh to the coastline which is about 16 km. Most of the 10,000 km² of the delta is made up of swamps, with a few islands of solid red earth, trending north-south, which form the only firm dry land; the mean elevation of these islands is approximately 20 m. (See ANNEX 5 – TIDAL TABLES).

6.5.5 Climate

Nigeria enjoys a tropical climate with distinct wet and dry seasons. There is, however, a steady decrease from the coast towards the hinterland in the duration and intensity of the wet season. The wet and dry seasons are associated respectively with the prevalence of the moist maritime southwesterly monsoon winds from the Atlantic Ocean and the dry continental northeasterly harmattan winds from the Sahara Desert. The fluctuating boundary zone between these two air masses is sometimes called the Inter-Tropical Discontinuity (ITD) or the Inter-Tropical Convergence Zone (ITCZ). The sequence of weather types experienced at a given year is determined primarily by the location of that place relative to the fluctuating surface position of the ITD and ITCZ.

6.5.6 Rainfall

Rainfall in Nigeria is highest in coastal areas of Lagos, Ondo, Edo, Delta, Rivers and Akwa Ibom states where the annual rainfall ranges generally between 2,400mm and 3,200mm. The rainfall

decreases progressively inland. Generally, the rainfall continues to decrease with increasing latitude and distance from the coast until about latitude 9°N. The pattern is broken thereafter on the Jos plateau where the average rainfall is between 1,200mm and 1,400mm, due to relief or orographic effects. Apart from these orographic effects the annual rainfall in Nigeria can be said to decrease progressively inland from the coastal area to the northern boundary areas of the country where the lowest rainfall of between 520mm and 650mm can be recorded. The rainy season in the country generally lasts from about March/April until October/November. The dry season lasts from November until March.

6.5.7 Temperature

The temperature distribution in Nigeria is varied with hottest months in the country being February in the southern areas (annual average figures; 24-28°C) March in the central areas and April in the northern areas. The highest mean monthly maximum temperatures are 33°C in February, 37°C in March and 40°C in April.

6.5.8 Vegetation

The main types of vegetation, which occur in Nigeria, are swamp forests, the extensive savanna and a narrow belt of Sahel occupying the extreme north. (See ANNEX 6 – VEGETATION MAP OF NIGERIA).

6.5.9 Soils

The major soil types of Nigeria can be related to four primary factors: Climate, vegetation, lithology and topography. Climatic factors influence the rate and depth of weathering and soil formation, which generally decrease from the humid south to the subhumid north. The soil moisture regime, which is very important in agricultural productivity, is particularly highly correlated with the incidence of rainfall in different parts of the country.

The density of vegetation also conditions soil moisture. Generally, soils become more prone to desiccation towards the north, not only because of the less humid climate but also because of the scantier vegetation cover. With increasing desiccation, hard iron concentration and layers of iron and clay pans occur in the soil profiles. However, these features also occur in the south where deforestation by man has exposed the soil to isolation. The organic matter content of the soils, which is so important to their productivity and structural stability, varies with the nature and density of vegetation cover.

Within the broad ecological zone, the distribution of major soil types is largely related to the parent rock, which influences such properties as soil depth, texture and stoniness, moisture condition, nutrient status and the proportion of minerals prone to weathering. At the local level, soil types are related to slope. Everywhere it is possible to recognize a sequence of soils known as a soil catena, related to local topography: in areas of smooth relief the upper

slopes usually have sedentary, rather clayey, soils developed directly on the underlying parent rock, while lower slope soils are formed of hill wash materials and are thus more sandy and stony.

In summary it can be seen that the geographical conditions are diverse covering a wide range of ecological conditions which would require considerable flexibility in tackling large oil spills.

6.5.10 Sensitive Areas

The Niger Delta and the contiguous coastal and inland areas in which are concentrated most of the petroleum activities, are rich in agricultural resources – fish, farmlands, economic trees, water bodies used for various purposes, the sensitive ecosystem itself, etc. Moreover, there are several inhabited areas within the Delta. Consequently there is a high level of maritime economic activities – ports, movement of several ocean-going vessels. There are also the long stretches of beaches. In the hinterland, the crude and product-carrying pipes criss-cross farmlands, inland fresh water bodies, roads and inhabited areas. The storage depots are not necessarily sited in locations of low environmental sensitivity. The refinery that is located inland (the Kaduna refinery) is sited close to Rivers Rido and Romi into which could flow oil spills, effluent discharges and runoffs from the Refinery and Petrochemical Complex. The rivers flow into the Kaduna River, which is the source of potable water for a number of states in the northern part of the country.

In the event of a spill from any of the petroleum handling facilities within the country, the resources described above and many more would be at high risk, especially if the livelihood of the inhabitants in the area depends on such natural resources. Due to the culture of subsistence farming and fishing all over the country, the local inhabitants can not but depend on their respective immediate environments. Any major spill therefore would devastate the very roots of the understructure upon which the inhabitants' livelihood is built.

6.5.11 Priorities for Protection

The tidal and non-tidal freshwater zones, the mangrove swamps, and the coastline have been identified as sensitive areas of the Delta and contiguous portions. These areas as well as parts of the hinterland through which pipelines cross require high priority protection especially as most of the oil fields and pipelines are within these zones. Other priorities for protection would derive from detailed Environmental Sensitivity Index Maps and Environmental Baseline studies/data. An existing ESI Map for Nigeria-Outer Coast is shown in the ANNEX 9.

7.0 KEY GOVERNMENT DEPARTMENTS AND ORGANIZATIONS

7.1 In the National Oil Spill Contingency Plan, the following Government Ministries and Agencies have been identified as vital in the roles they will be expected to play in the event of a major oil spill disaster.

The Federal Ministry of Environment

The Ministry of Petroleum Resources

The Ministry of Defence (The Army, The Navy, The Air Force)

The Ministry of Foreign Affairs

The Federal Ministry of Lands, Housing and Urban Development

The Federal Ministry of Transport

The Federal Ministry of Aviation

The Federal Ministry of Health

The Federal Ministry of Agriculture and Rural Development

The Federal Ministry of Water Resources

The Federal Ministry of Information and Communications

The Federal Ministry of Science and Technology

The Nigerian National Petroleum Corporation (NNPC)

The Nigerian Institute of Oceanography and Marine Research

The Nigeria Police

The Nigerian Meteorological Agency

The National Emergency Management Agency (NEMA)

The Nigerian Ports Authority

The Nigerian Maritime Administration and Safety Agency (NIMASA)

The Oil Producers' Trade Section of the Lagos Chambers of Commerce (OPTS)

State and Local Governments

NGO's and Communities

The Nigerian Red Cross Society

Industrial Groups and Academic Organizations

8.0 ROLES OF KEY GOVERNMENT MINISTRIES, DEPARTMENTS AND AGENCIES

8.1 Federal Ministry of Environment

By the Executive Order that establishes FEDERAL MINISTRY OF ENVIRONMENT (FMEnv), the Federal Ministry of Environment (FMEnv) is charged with the responsibility of ensuring a clean environment throughout Nigeria. The Ministry is expected to protect Nigeria's environment against possible degradation by regulating the activities of industries in the country.

8.2 National Oil Spill Detection and Response Agency (NOSDRA)

NOSDRA is the lead agency for all matters relating to oil spills response management in Nigeria. As a parastatal under the Federal Ministry of Environment, NOSDRA shall in the event of a major or disastrous oil spill, in collaboration with other line Agencies and Responsible Parties:-

- ❖ Assess the extent of damage to the ecology by matching conditions following the spill against what existed before (reference baseline data and ESI maps).
- ❖ Undertake a post-spill impact assessment to determine the extent and intensity of damage and long term effects.
- ❖ Advise Government on possible effects on the health of the people and ensure that appropriate remedial action is taken for the restoration and compensation of the environment.

- ❖ Assist in mediating between affected communities and the spiller.
- ❖ Monitor the response effort during an emergency, with a view to ensuring full compliance with existing legislation on such matters.
- ❖ Assess any damage caused by the spill incident.
- ❖ Urgently process and grant approval for any request made to it by the spiller for the use of approved dispersant or the application of any other technology considered vital in ameliorating the effect of the spill.
- ❖ Advise and guide the response effort so as to ensure the protection of highly sensitive areas/habitats and the salvaging of endangered or threatened wild life.
- ❖ Monitor the clean-up operations to ensure full rehabilitation of the affected areas.
- ❖ As the Chairman of the National Oil Spill Response Committee shall provide up-to-date information on the spill response efforts.

8.3 The Nigerian National Petroleum Corporation

By equity participation in oil operations with her joint venture partners the NNPC absorbs a good proportion of the expenditure incurred by her operating partners including compensations and claims arising from damage caused by an oil disaster. In this regard the NNPC shall:

- ❖ Co-operate with the spiller in determining appropriate measures to prevent excessive damage.

- ❖ Promptly refer the proposal made to her for the response effort to the National Oil Spill Detection and Response Agency (NOSDRA).
- ❖ Mobilize its internal resources and also assist in obtaining any outside resources that may be required to combat the spill.

8.4 Nigerian Institute for Oceanography and Marine Research (NIOMR)

- ❖ Assist with data for oil spill trajectory models for spillage in brackish and ocean waters.
- ❖ Monitor the extent of impact in the coastal and marine environment.
- ❖ Monitor the effectiveness of cleanup exercises and advise on least-damaging techniques for quick recovery of impacted areas.
- ❖ Upon commission, monitor the recovery rates of impacted areas and document for future use, the most acceptable methods for cleanup in each ecotype.
- ❖ Recommend rehabilitation/restoration methods for the recovery of impacted areas.
- ❖ Provide Technical/Scientific Support Services to the NOSDRA.

8.5 Federal Ministry of Lands, Housing and Urban Development

- ❖ Mobilize human and equipment resources to evacuate affected human communities to safer grounds.
- ❖ Construct temporary to semi-permanent structures and shelters for the resettlement of victims.
- ❖ Provide access roads to the scene of the incident.

- ❖ Have the men of its Fire Fighting Department to mobilize to fight possible fire that may result from the spill.
- ❖ Organize the men of the fire department for general rescue operation.

8.6 Federal Ministry of Health

The Ministry shall in the event of oil spill disaster:

- ❖ Set up medical outposts around the scene of the incident to provide medical treatment to the affected communities.
- ❖ Mobilize medical personnel, drugs and other relief items to check epidemic.
- ❖ Monitor the effect of the spill on the general health of the community.
- ❖ Observe for possible outbreak of new health conditions that might be attributable to the incidence of the oil spill especially health impacts on potable water supplies.
- ❖ Mobilize requirements in hospitals to respond to the emergency.

8.7 The Nigerian Ports Authority

Shall:-

- ❖ Mobilize all nearby port facilities to assist in the response effort.
- ❖ Provide barges and other storage facilities for recovered oil.
- ❖ Facilitate berthing for vessels involved in the spill combat.

8.8 The Nigerian Maritime Administration and Safety Agency

Shall:-

- ❖ Provide advice on the navigability of shipping lanes, creeks and other inland waterways
- ❖ Assist in response to oil spills incidents in the marine environment

8.9 The Federal Ministry of Information and Communications

Shall:-

- ❖ Provide up-to-date information about the situation and give an unbiased view of the response effort to avail the affected communities and the general public with a clear and true picture of Government's effort, and whatever is expected of them.
- ❖ Monitor the response activities.
- ❖ Work in co-operation with outside media organizations to provide accurate reporting of the incident to the outside world.
- ❖ Assist in the setting up of communications centers around the scene of the spill.
- ❖ Assist with outside contacts with foreign based resource centers for possible assistance.
- ❖ Allocate special frequencies for use by the National and Zonal Command and Control Response Centres and the CNA.

8.10 Federal Ministry of Agriculture and Rural Development

Shall:-

- ❖ Provide food and relief materials.

- ❖ Provide agricultural implements and other inputs to settle fishermen who may have been put out of business by the pollution of fishing areas by oil.

8.11 Federal Ministry of Water Resources

Shall:-

- ❖ Provide bore holes for water supply.
- ❖ Provide other emergency water supply sources

8.12 DEFENCE

8.12.1 THE ARMY: On full alert

- ❖ Evacuate victims of the spill to designated areas for settlement.
- ❖ Assist in the clean-up operation.
- ❖ Assist with communication support.
- ❖ Provide additional security back up.

8.12.2 THE NAVY: On full alert

- ❖ Patrol the sea and coastline.
- ❖ Assist in providing vessels for oil recovery.
- ❖ Render assistance to vessels in distress.
- ❖ Assist with communication support.
- ❖ Assist in the recovery operation in the sea.
- ❖ Provide current and tidal tables.

8.12.3 THE AIRFORCE: On full alert

- ❖ Make surveillance flights over the scene of the spill.

- ❖ Monitor the oil slick movement.
- ❖ Assist in approved dispersant application.
- ❖ Provide transportation to and from the scene.
- ❖ Assist with communication support.

8.12.4 THE NIGERIA POLICE: On full alert

- ❖ Keep order in the vicinity of the incident.
- ❖ Protect property and equipment at the scene.
- ❖ Protect workers from angry mobs.
- ❖ Assist with communication support.

8.13 Federal Ministry of Aviation

Shall:-

- ❖ Provide regularly, data on the prevailing weather conditions.
- ❖ Make predictions on weather changes.

8.14 Federal Ministry of Transport

Shall:-

- ❖ Provide transportation for personnel and equipment.

8.15 Federal Ministry of Foreign Affairs

- ❖ Shall assist in the provision of visas for foreign agencies and specialized group of persons that may be required to bring in assistance to Nigeria.
- ❖ Provide liaison services with foreign agencies in the event of technical and logistic support services.

8.16 National Emergency Management Agency (NEMA)

- ❖ Shall perform its obligatory function of supply of relief materials to needy persons and liaise with relevant State(s) Agency (ies) to evacuate and resettle persons should the need arise.
- ❖ Work alongside NOSDRA in coordinating oil spill emergencies.

8.17 State and Local Governments

The State(s) and Local Governments whose territory (ies) an oil spill and associated incidents have occurred are encouraged or required to:

- ❖ Assign an office or agency to represent the State/LG on the zonal response team.
- ❖ Cooperate fully in all the activities during a response exercise.
- ❖ Assist in raising and training an ad hoc intervention team from within its area of jurisdiction.
- ❖ Include contingency planning for responses, consistent with this plan, and zonal plans, in all related emergency and disaster planning.
- ❖ Initiate public safety and community relations actions necessary to protect public health and welfare during an emergency.
- ❖ Assist in directing evacuation in accordance with any existing State/LG contingency procedures.

8.18 Oil Producers' Trade Section (OPTS)

Shall:-

- ❖ Provide the operational and ESI maps of the area or areas affected or likely to be affected by the oil spill.
- ❖ Provide all necessary logistics support services including equipment and specialist personnel for the response efforts.
- ❖ Assist in securing the services of international organizations like Oil Spill Response Limited (OSRL), Southampton U.K. and Red Adair.

8.19 Non-Governmental Organizations (NGOs)

NGOs, industry groups, academic organizations and others are encouraged to offer their services in:-

- ❖ Assisting in their respective ways to ensure effective response actions.
- ❖ Conducting scientific researches alongside government groups to evolve and devise sustainable cleanup strategies and rehabilitation techniques.
- ❖ Organizing, coordinating and ensuring safe use of volunteers in a response action, and actually identifying where these volunteers can best render services effectively.

9.0 THE TIERED RESPONSE SYSTEM

9.1 It is important that the internationally accepted definitions of oil spill categorization are clearly understood as they are essential in Tiered Response.

9.2 Tier 1

Operational type spills of volume between **0 – 25 barrels to inland waters** OR **0 – 250 barrels to land or coastal/ offshore waters** that may occur at or near a company's own facilities, as a consequence of its own activities. An individual company would typically and under OPRC is required to provide resources to response to this size of spill.

9.3 Tier 2

A larger spill of volume **25 - 250 barrels to inland waters** OR **250 – 2500 barrels to land or coastal/ offshore waters** in the vicinity of a company's facilities. Resources from another company, industry and possible government response agencies in the area can be called in on a mutual aid basis. The company will participate in local co-operative such as the CNA where each member pools their Tier 1 resources and has access to any equipment which has been jointly purchased by the cooperative.

9.4 Tier 3

This is a major spill, **greater than 250 barrels to inland waters OR above 2500 barrels to land or coastal/ offshore waters** where substantial further resources will be required and support from a national (Tier 3) or international co-operative stock pile, like the Oil Spill Response Limited (OSRL), may be necessary. It is likely that such operation would be subject to government controls or even direction. It is important to recognize that a spill which could receive a Tier 3 response may be close to, or remote from, company facilities.

10.0 ORGANIZATIONAL STRUCTURE

10.1 This plan is formulated and established to detect, monitor and co-ordinate the response to all oil spills occurring within the Federal Republic of Nigeria. The Plan's Organizational Structure will be headed by the National Oil Spill Detection and Response Agency (NOSDRA).

10.2 This structure incorporates the concept of the Tiered Response System. Tier 1 response will be provided by individual operators, while the Tier 2, CNA response can be activated either at the request of the On-scene Commander or by the direction of a Zonal Commander depending on the circumstances of the spill situation. The Tier 3 NOSDRA Response will be activated by a directive from the National Commander. While normally such a Tier 3 activation would follow a request from a Zonal Commander, the initiative by the National Commander is not necessarily limited to this case.

Figure 10.1

OVERVIEW OF
THE NATIONAL OIL SPILL CONTINGENCY PLAN (NOSCP)
ORGANIZATIONAL STRUCTURE

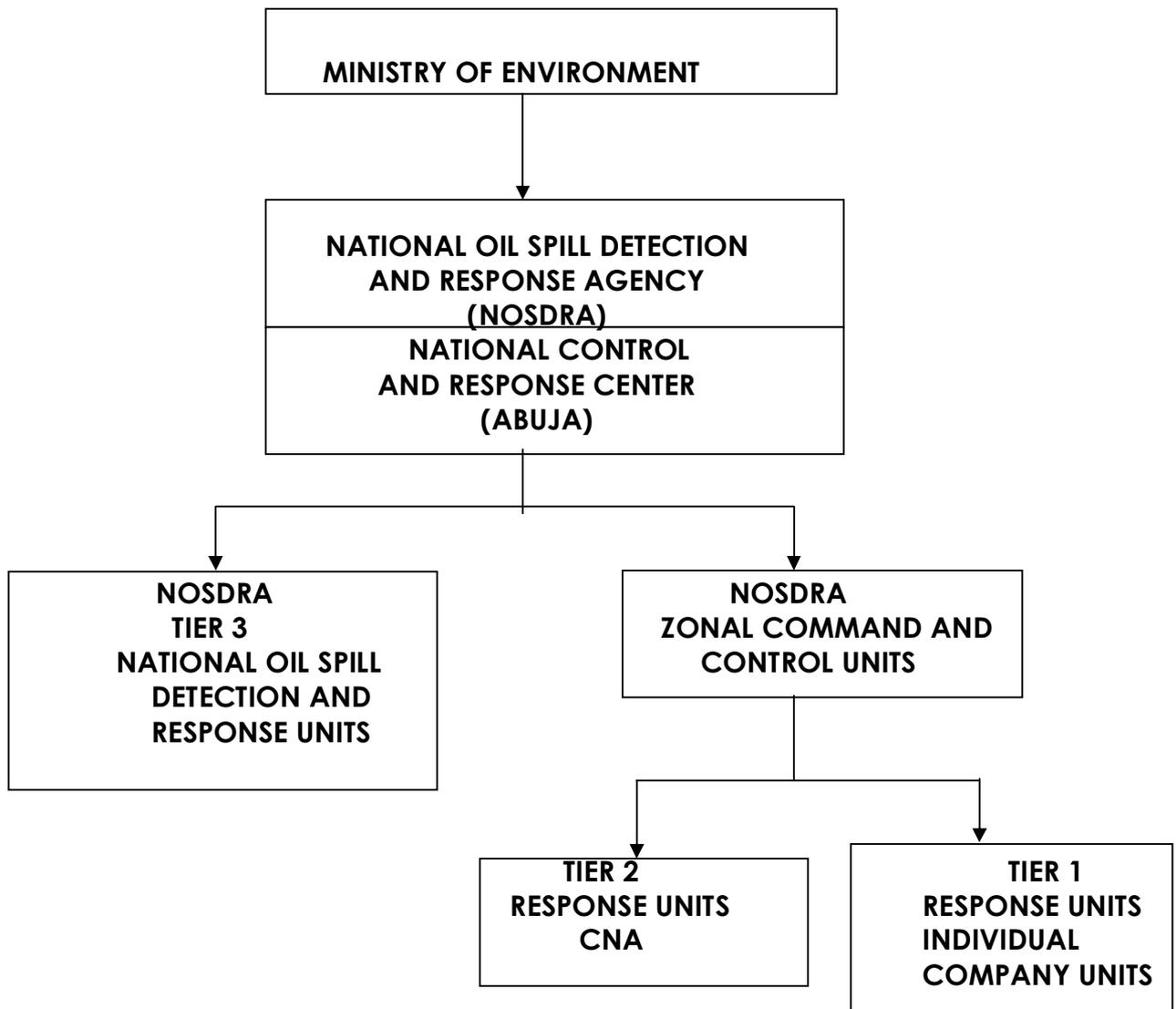


Figure 10.2

NATIONAL OIL SPILL CONTINGENCY PLAN (NOSCP) OVERVIEW OF AUTHORITY AND RESPONSIBILITIES

NOSDRA NATIONAL HEADQUARTERS (ABUJA)
NATIONAL COMMANDER
NATIONAL RESPONSIBILITY FOR IMPLEMENTATION OF ALL NOSCP REQUIREMENTS: <ul style="list-style-type: none"> • POLICY • DETECTION • COMPLAINT • PREPAREDNESS • REPORTING • RESPONSE • COMMAND AND CONTROL • ACTIVATION OF NOSDRA TIER 3 UNITS • CALLING FOR EXTERNAL/ INTERNATIONAL RESOURCES

NOSDRA TIER 3 NATIONAL OIL SPILL DETECTION AND RESPONSE UNITS	
NIGERIAN NAVY MARINE OIL SPILL OPERATIONS COMMAND	NIGERIAN AIRFORCE AIRBORNE OIL SPILL OPERATIONS COMMAND
Bases at: Lagos, Escravos, Warri, Forcados, Brass, Bonny, Port Harcourt, Calabar/ Eket	Bases at: Lagos, Port Harcourt, Calabar, Kaduna
Complaine Detection and Monitoring Marine Oil Spill Response Enforcement via Marine Patrols	Large Area Surveillance and Enforcement Aerial Monitoring of Operations Command and Control Aerial Dispersant Spraying Data Collection for other uses: desertification etc
Tier 3 Responsible for Initial and Overall Response to all Tanker Incidents	

NOSDRA ZONAL COMMAND AND CONTROL UNITS
ZONAL COMMANDERS
ZONAL RESPONSIBILITY FOR IMPLEMENTATION OF ALL NOSCP REQUIREMENTS: <ul style="list-style-type: none"> • POLICY • DETECTION • COMPLAINT • PREPAREDNESS • REPORTING • RESPONSE • COMMAND AND CONTROL
ZONAL AUTHORITY FOR: <ul style="list-style-type: none"> • Approval for the use of Dispersants • Activation of Tier 2 (CNA) if Tier 1 Response is inadequate • Designating On-scene Commanders • Requesting National Commander to activate NOSDRA Tier 3 Response Units

TIER 2
NIMASA

TIER 2 - CNA

- "Niger Delta Strike Team" Response
- Limited Offshore Response

TIER 1 - Operators

- Required Initial Response

11.0 REPORTING AND COMMUNICATION

- 11.1 All oil spills must be reported to NOSDRA using the oil spill reporting format as provided in Chapter 12. The Agency maintains toll-free numbers for the purpose of oil spill reporting as follows: **08031231012**
- 11.2 The first information regarding an oil spill may come from any source including the general public. This notification would initially be passed to the Tier 1 (company operator).
- 11.3 Without prejudice to the operator's decision, all spill incidents shall be reported to the nearest Zonal Command and Control Unit of NOSDRA. Depending on the nature and magnitude of the spill, the National Commander shall notify the Chairman of the National Oil Spill Response Committee who shall in consultation with the members of his committee, and alert a pre-determined oversea country for assistance if considered necessary. The National Commander of the National Oil Spill Response Committee shall also alert the Customs and Immigration Departments in order to facilitate the entry of oversea personnel, equipment and materials. A typical alerting procedure, shown in the following form , shall advise relevant department(s) for action and other departments for information only.

12.0 OIL SPILL REPORTING FORMAT



National Oil Spill Detection & Response Agency

FORM A OIL SPILL/LEAK NOTIFICATION REPORT

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(24h standard/daylight)				
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11. Date/Time of Visit by Regulations:

12. Remarks by any Third Party

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13. General Remarks

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14. NOTE: Officials of NOSDRA must be present when samples are collected, and when analyses begin.

REPORTING OFFICER:

DESIGNATION:

SIGNATURE:

DATE:

13.0 ALERTING SYSTEM AND ACTIVATION

13.1 The National Plan will be considered activated upon the detection of any oil spill, regardless of its size. Following such detection, both the previously described report to government and an initial response from the appropriate Tier level will be required. Subsequently, depending upon the spill situation, a higher Tier participation may be required. It is important to stress that the success of any and all response actions will depend on all parties understanding and operating within a chain of command structure with clearly defined relationships and responsibilities.

14.0 CHAIN OF COMMAND

14.1 The chain of command embodied in the National Oil Spill Contingency Plan represents a Tiered Response Plan which provides for a response capability to major or disastrous oil pollution which is beyond the capabilities of individual oil company's first response. The chain of command, thus integrates the three Tiers of contingency planning thereby providing the necessary organizational structure, command and control, communication network and effective information service to ensure that government can be kept fully informed of all spill occurrences, monitor the spill response and intervene when required so as to cope with all spills which threaten the Nigerian environment.

14.2 National Oil Spill Detection and Response Agency (NOSDRA)

The National Oil Spill Detection and Response Agency (NOSDRA) is a parastatal under the Federal Ministry of Environment. It is responsible for surveillance to ensure compliance with environmental legislation in the Petroleum Sector, as well as to detect oil spills, and monitoring, surveillance and co-ordinating spill response activities throughout the Federal Republic of Nigeria. NOSDRA is headed by a Director General, appointed by the President on the recommendation of the Honourable Minister of Environment, and is based in the NOSDRA National Headquarters, Abuja. NOSDRA as a decentralized organization will delegates power to the Zonal Offices in the Incident Command System (ICC).

14.3 National Oil Spill Response Advisory Committee (NOSRAC)

The National Oil Spill Response Advisory Committee (NOSRAC) will be an advisory body within NOSDRA. The members of this committee will be drawn from relevant ministries, departments, parastatals, operators etc. as outlined in the following Table. This Committee shall be a policy formulation body and as well shall act in an advisory capacity to the National Commander of NOSDRA in any situation in which the Organization is called upon for a response action.

14.4 National Command and Control Response Centre (NCCRC)

The National Command and Control Response Centre (NCCRC), shall be established as a report processing and response coordinating centre for all oil spill incidents, receiving all reports of oil spillages throughout the Federal Republic of Nigeria from the Zonal Command and Control Units of NOSDRA. NCCRC shall serve as the command and control centre for compliance monitoring of environmental legislation in the Petroleum Sector, surveillance for spill detection for monitoring and coordinating responses required in plan activations. It shall be equipped with crisis management system including but not limited to the following accessories for:

- ❖ Simulation Executive Network Control
- ❖ Visual Systems
- ❖ Performance Measurement Data Libraries
- ❖ Geographic Information Systems (GIS)
- ❖ Resources Data Base
- ❖ Environmental Models
- ❖ Incident Command System
- ❖ Equipment Modeling

- ❖ Cost Benefit Models
- ❖ Data Base Management Systems
- ❖ Early warning Spill Detection Buoys

In addition to written reports, special predesignated telephone and communication systems such as e-mail, radio signals, and fax e.t.c shall be maintained by NOSDRA for the purpose of reporting a spill.

Table 2

MEMBERSHIP OF THE NATIONAL OIL SPILL RESPONSE ADVISORY COMMITTEE

Chairman: Shall be appointed by the President on the recommendation of the Minister.

MEMBERS: Shall have one (1) representative each not below the rank of a Director

The Federal Ministry of Environment

The Ministry of Defense:

- The Army
- The Navy
- The Air Force

The Federal Ministry of Petroleum Resources

The Federal Ministry of Transport

The Federal Ministry of Aviation

The Federal Ministry of Employment, Labour and Productivity

The Federal Ministry of Lands, Housing and Urban Development

The Federal Ministry of Information and Communications

The Presidency – National Emergency Management Agency

The Federal Ministry of Health

The Federal Ministry of Foreign Affairs

The Ministry of Interior

The Federal Ministry of Agriculture and Rural Development

The Federal Ministry of Water Resources,

The Nigerian National Petroleum Corporation (NAPIMS)

The Nigeria Police

The Nigerian Institute for Oceanography and Marine Research (NIOMR)

The Oil Producers' Trade Section of the Lagos Chamber of Commerce (OPTS)

The Department of Meteorology

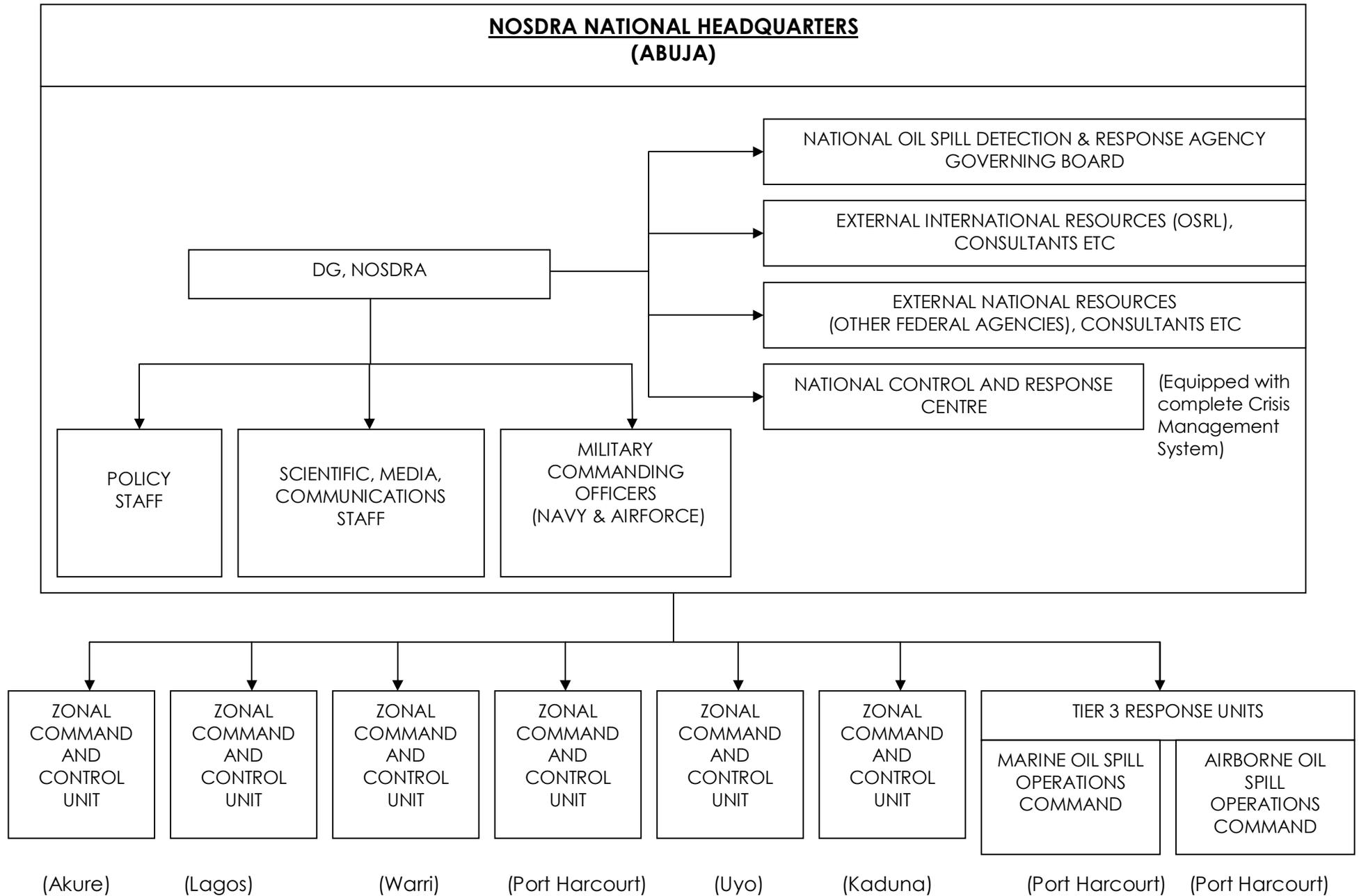
The Nigerian Ports Authority PLC

The Nigerian Maritime Administration and Safety Agency (NIMASA)

The Clean Nigeria Associates (C N A)

DG, NOSDRA shall serve as the Secretary

Figure 14. 1



14.5 NOSDRA Tier 3 – Marine Oil Spill Operations Command (MOSOC)

The Marine Oil Spill Operations Command shall be a special command located within the Nigerian Navy, which through the military chain of command, can be called out by NOSDRA Headquarters in the event of a Tier 3 incident. MOSOC Headquarters will be in Port Harcourt with operational bases located in Lagos, Escravos, Warri, Forcados, Brass, Bonny, Port Harcourt, Calabar/Eket and Igbokoda (Ondo State).

The Marine Oil Spill Operations Command will be required, as directed, to undertake the following functions:-

- Command, Control, Co-ordination and Implementation of Oil Spill Response Operations;
- Surveillance and Monitoring of Nigerian Waters to ensure compliance with National Environmental Legislation;
- Enforcement of National Environmental Legislation;
- The training and exercising of Marine Oil Spill Operations Command personnel and assets both in-house and in conjunction with other related units to maintain and continually develop response capabilities; and,
- Other special marine activities to utilize fully the Command's marine assets and skills.

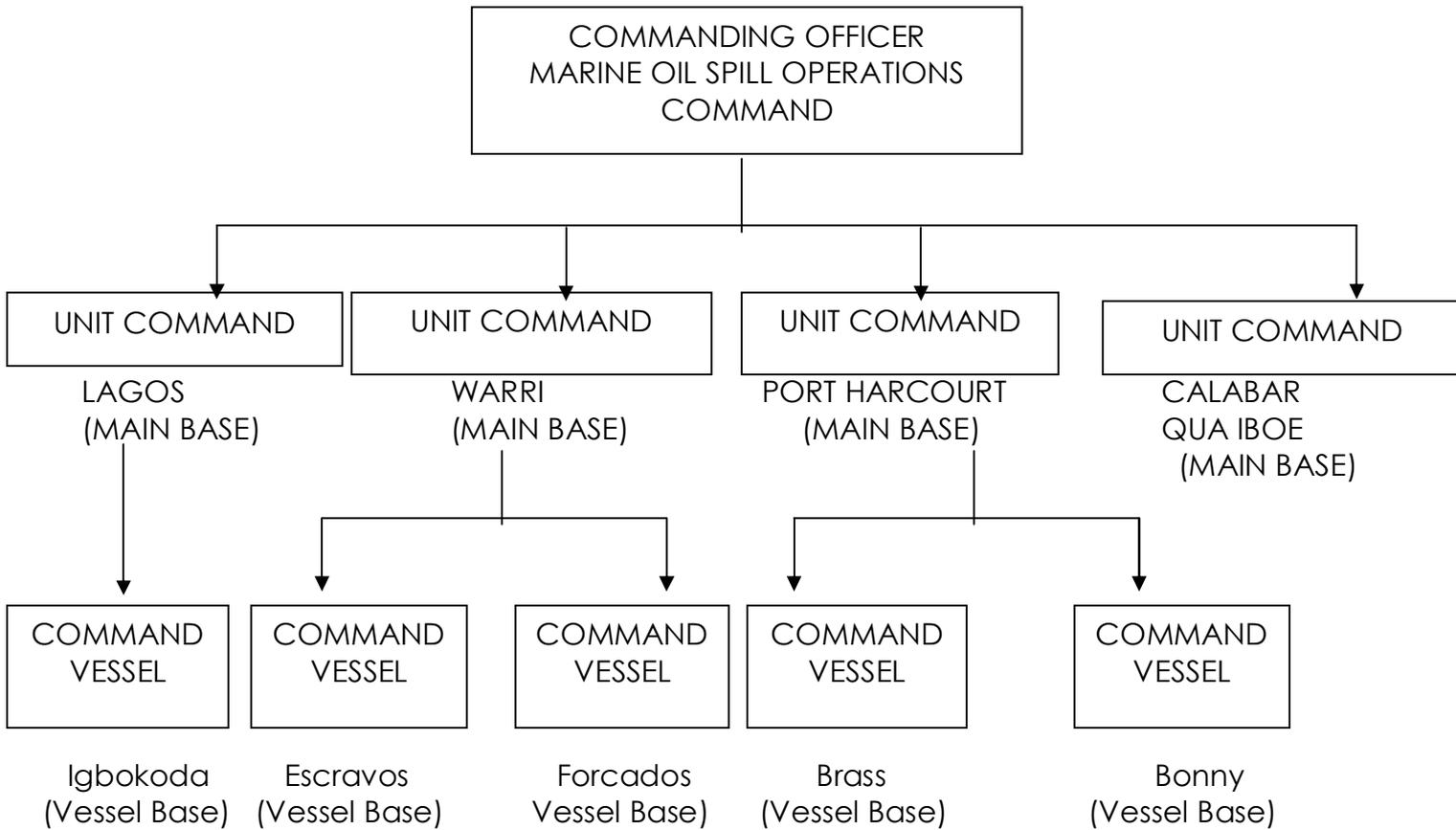
Figure 14.2

NOSDRA Tier 3

NIGRIAN NAVY
MARINE OIL SPILL OPERATIONS COMMAND

ORGANISATIONAL STRUCTURE

PORT HARCOURT HEADQUARTERS



14.6 NOSDRA Tier 3 – Airborne Oil Spill Operations Command (AOSOC)

The Airborne Oil Spill Operations Command shall be a special command located within the Nigerian Air force, which through the military chain of command, can be called out by NOSDRA Headquarters. The Headquarters of AOSOC will be in Port Harcourt with operational bases at Lagos, Port Harcourt, Benin and Kaduna, Benin Maritime Air patrol center.

The Airborne Oil Spill Operations Command will be required, as directed, to undertake the following functions:-

- Command, Control, Co-ordination and Implementation of Oil Spill Response Operations
- Aerial application of approved oil dispersants
- Aerial surveillance and monitoring activities to ensure compliance with National Environmental Legislation
- Enforcement of Nigerian Environmental legislation
- Remote Sensing Operations for the collection and monitoring of key environmental parameters
- The training and exercising of Airborne Oil Spill Operations Command personnel and assets both in-house and in conjunction with the Marine Oil Spill Operations Command to maintain and continually develop response capabilities
- Other special airborne activities to fully utilize the Command's airborne assets and skills.

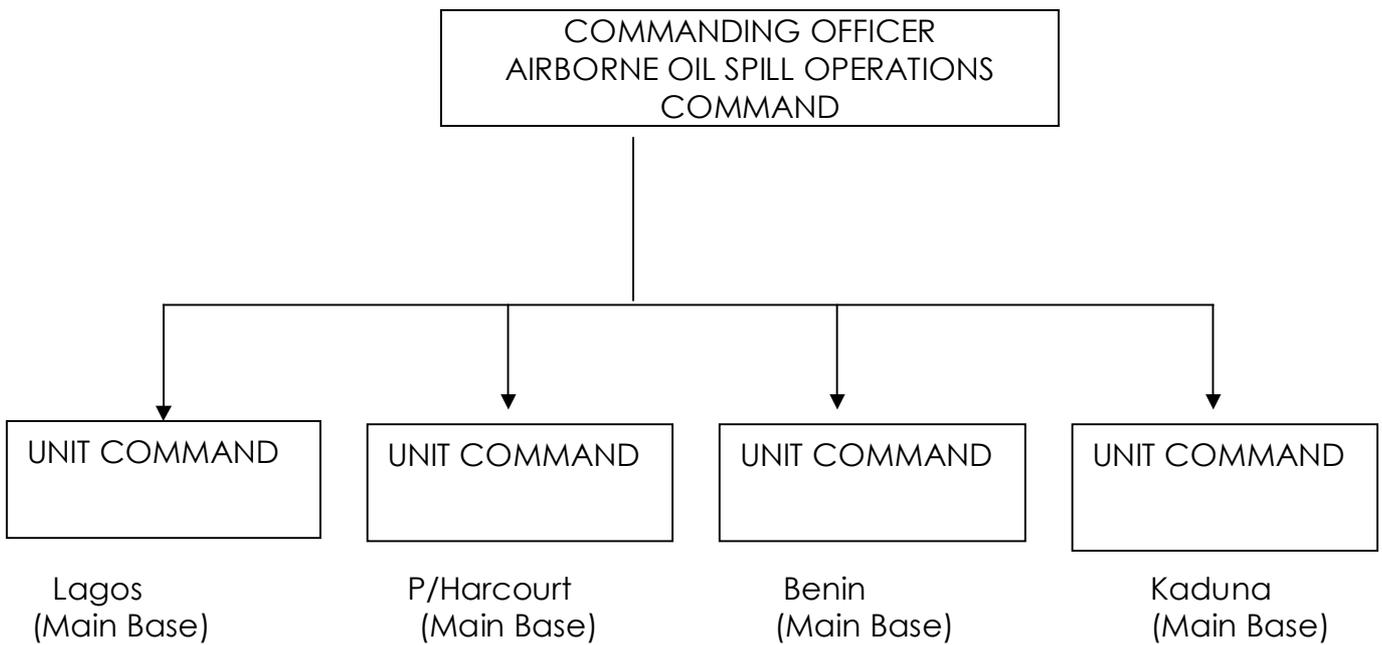
Figure 14.3

NOSDRA TIER 3

NIGRIAN AIRFORCE
AIRBORNE OIL SPILL OPERATIONS COMMAND

Organizational Structure

PORT HARCOURT HEADQUARTERS



14.7 Zonal Command and Control Unit

For operational efficiency, NOSDRA has established six Zonal Offices within the Federal Republic of Nigeria, each of which will directly report to the NOSDRA National Headquarters. These six Zonal Offices are located at NOSDRA Zonal Offices in Akure, Lagos, Warri, Port Harcourt, Uyo and Kaduna. Each Office is headed by a Zonal Commander who shall be the NOSDRA Zonal Director. The Zonal Commander will report to the National Commander and will operate from a headquarter unit with a structure similar to the national headquarters.

The zonal headquarters are to receive the spill report for all spills occurring within the zone and in turn pass the same information to the national headquarters. Zonal Commanders will have the authority to approve the use of approved dispersants within their zone subject to NOSDRA Guidelines. They will liaise with and monitor the On-scene Commanders directing any spill response within the zone. They will have the authority to call for a change of On-scene Commanders, approve disposal techniques and as well call for a Tier 2 (CNA) response if they determine a Tier 1 response inadequate. Finally, all requests for activation of Tier 3 Response Unit within their zone will come through them.

Figure 14 .4

ZONAL COMMAND AND CONTROL
ORGANISATIONAL STRUCTURE

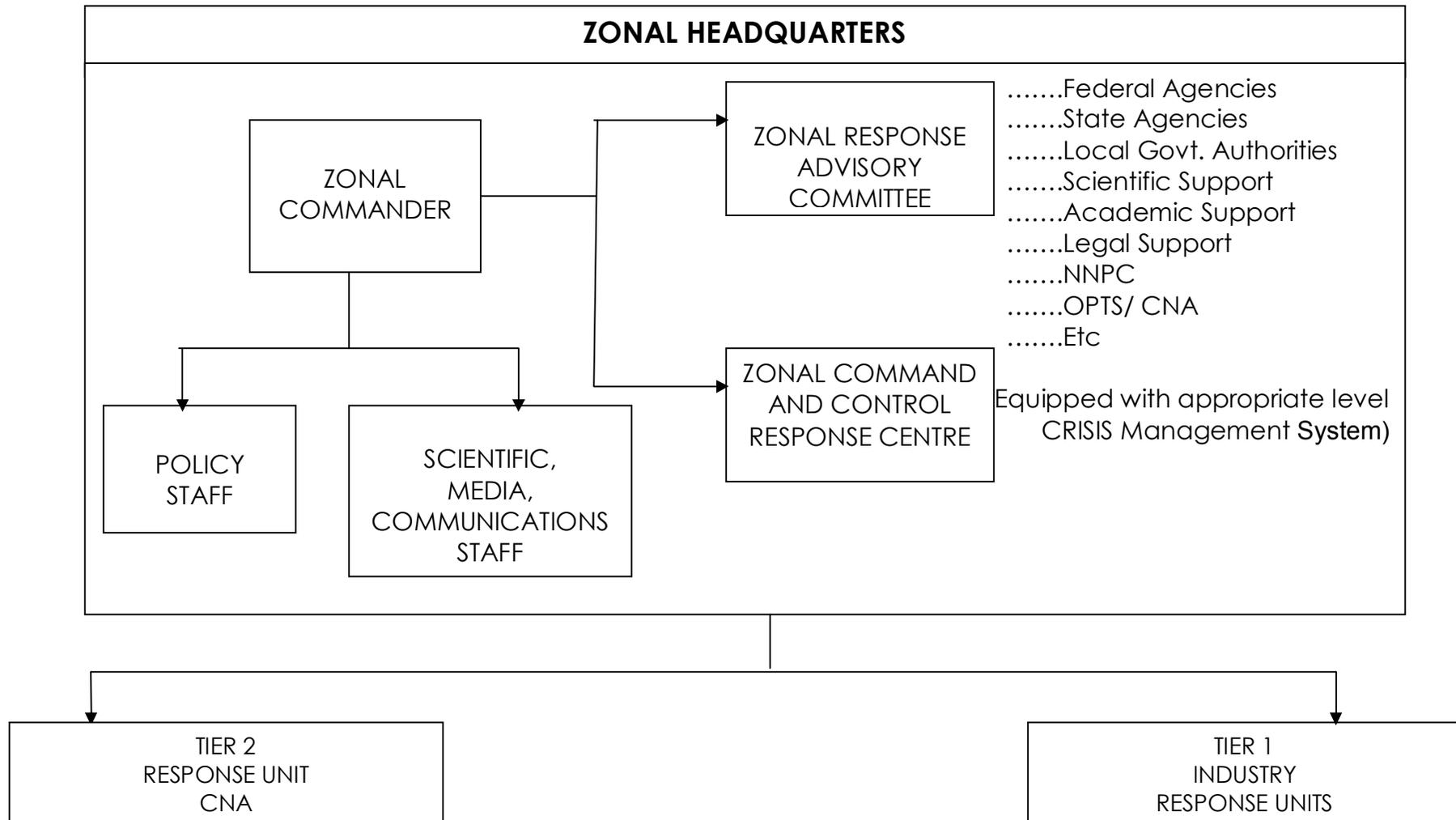


Table 3

ZONAL COMMAND AREAS

The coverage areas of the six zonal commands are as displayed in this table.

ZONE	ZONE 1	ZONE 2	ZONE 3	ZONE 4	ZONE 5	ZONE 6
HEADQUARTERS	ABUJA	LAGOS	WARRI	PORT HARCOURT	KADUNA	UYO
CATCHMENT AREAS (STATES)	MINNA	LAGOS	DELTA	RIVERS	KADUNA	AKWA IBOM
	NASARAWA	OGUN	EDO	IMO	KANO	CALABAR
	NIGER	OSUN	ONDO	ANAMBRA	SOKOTO	BENUE
	KOGI	OYO	EKITI	ABIA	KEBBI	TARABA
	KWARA			ENUGU	KATSINA	ADAMAWA
	PLATEAU			BAYELSA	JIGAWA	
				EBONYI	BAUCHI	
					YOBE	
					BORNO	
					GOMBE	
					ZAMFARA	

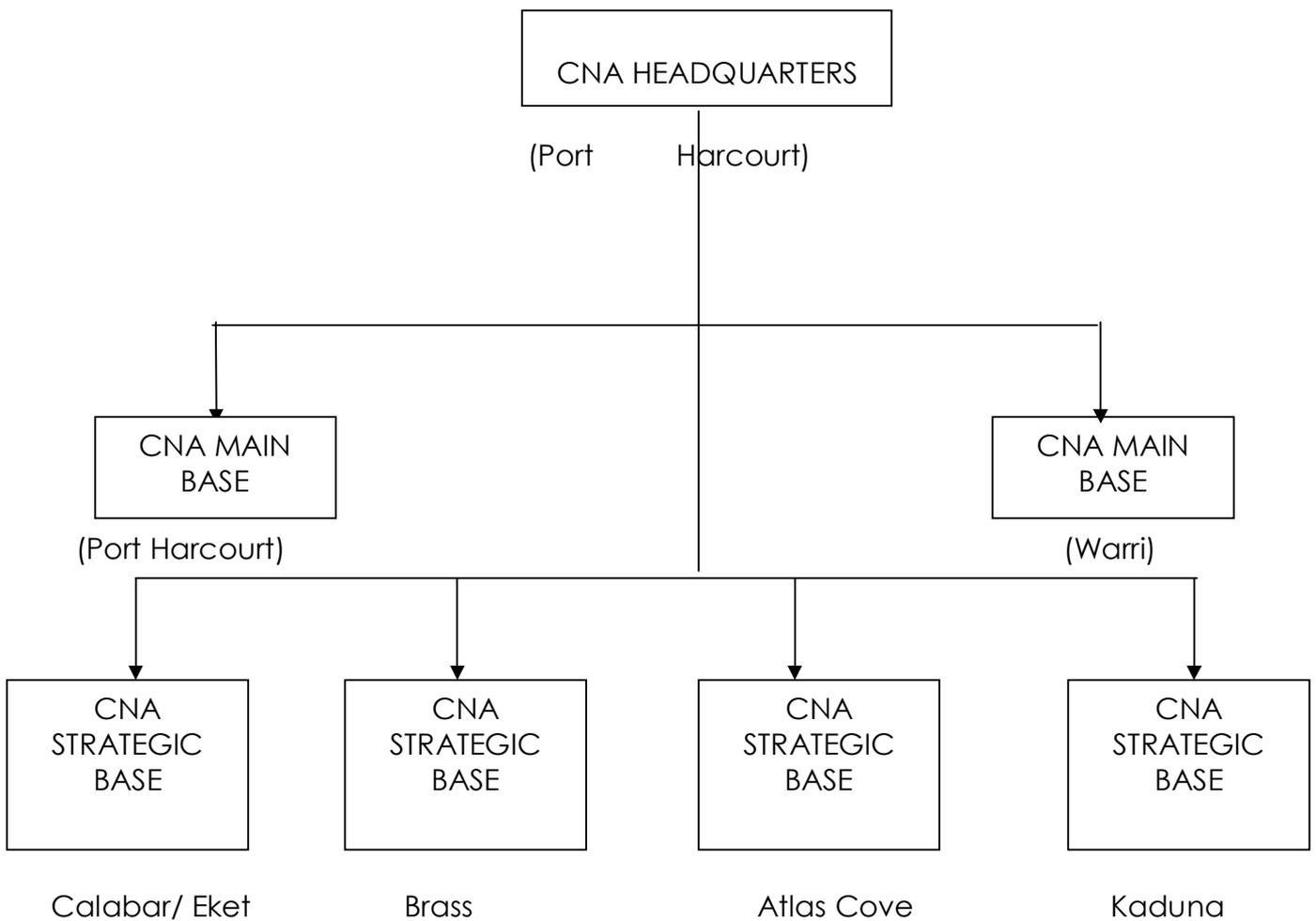
14.8 Tier 1 Response Organization

- As specified in Individual Company Contingency Plans
- Will be regularly audited and Tested by appropriate Zonal Commands.

14.9 Tier 2 Response Organization- Clean Nigeria Associates (CNA)

Figure 14.5

CNA SPILL RESPONSE ORGANISATIONAL STRUCTURE



14.10 Government/Industry Relations

For effective and efficient command execution a smooth Government/Industry interface is required throughout all faces of any response. While command boundaries cannot be precisely specified without reference to the particular spill situation, the following table gives a guideline.

Table 4

SAMPLE: GOVERNMENT/INDUSTRY RELATIONS**RESPONSE REACTION GUIDELINES****DIRECTOR GENERAL (NOSDRA) TO BE INFORMED OF ALL SPILLS AT ALL TIMES**

INCIDENT TYPE	OIL COMPANY	PORT AUTHORITY	CNA	NIMASA	NOSDRA	EXTERNAL REINFORCEMENT	COMMAND
MINOR INCIDENT TIER 1 0 – 25 bbls (inland waters) 0 – 250 bbls (land/coastal or offshore waters) TANKER AT FACILITY	RESPOND	-	STAND-BY		MONITOR		OIL COMPANY
OIL FACILITY	RESPOND	-	STAND-BY		MONITOR		OIL COMPANY
NON TANKER IN PORT		RESPOND	-		STAND-BY		PORT AUTHORITY
TANKER &NON TANKER AT SEA			-	RESPOND	RESPOND		NOSDRA
UNIDENTIFIED SLICK				RESPOND	RESPOND		
LARGE INCIDENT TIER 2 25 – 250 bbls (inland waters) 250 – 2500 bbls (land/coastal or offshore waters) ANYWHERE IN NIGERIAN WATERS	RESPOND	-	RESPOND	RESPOND	MONITOR STAND-BY		OIL COMPANY WITH CNA IN SUPPORT
ONLAND IN NIGERIA			RESPOND		MONITOR STAND-BY		OIL COMPANY
MAJOR INCIDENT CATASTROPHIC SPILL > 2500 bbls (inland waters) > 2500 bbls (land/coastal or offshore waters) ANYWHERE IN NIGERIAN TERRITORIAL WATERS	RESPOND	-	RESPOND		RESPOND	STAND-BY	NOSDRA

15.0 DUTIES AND RESPONSIBILITIES OF KEY PERSONNEL:

15.1 National Commander

The National Commander who shall be the Director General (NOSDRA) shall be appointed by the President on the recommendation of the Federal Ministry of the Environment.

Reports to: Minister of Environment

Scope: Has overall authority and responsibility in the management of all activities related to the control, and effective combat of any spill and associated incident for which this plan is called up at any level.

Specific Duties:

- Ensures that he is promptly informed of all major or disastrous oil spill incidents by setting up appropriate machinery
- Receives and evaluates notification of potential major environmental incidents (regarding oil spills), and conveys same information to the Minister of Environment
- Serves as a Member and Secretary to Governing Board.
- Set up the National Control and Response Centre (NCRC)
- Determines, in consultation with members of the National Oil Spill Response Organization whether or not, to activate the Tier 3 Response Units
- Determines which Federal Agencies or other organizations (local or foreign) should be called up in the course of an oil spill response operation, and so advises the Minister of Environment
- Integrates into the response/combat plan, the services of any such agencies/organizations to achieve optimum results.
- Ensures an effective and accurate information flow within his organization and between his organization and the public.

15.2 Zonal Commander

Reports to: National Commander

Scope: Has overall authority and responsibility in the management of all activities related to the control, and effective combat of any spill and associated incident for which this Plan is called up at the zonal level.

Specific Duties:

- Ensures that he is promptly informed of any spill incidents and reports same to the National Response Center.
- Zonal approval for the use of dispersant
- Zonal activation of Tier 2 (CNA) if Tier 1 Response is inadequate
- Designating On-scene Commanders
- Requesting Director General to activate NOSDRA Tier 3 Response Unit
- Zonal approval of disposal technique
- Ensures an unimpeded communication between the Zonal Response Centre and combating teams.
- Exercises overall responsibility for matters of public relations, law and order in his area of jurisdiction.
- Submits reports to the Director General
- Sets up machinery for receiving reports on oil spill incidents.
- Complies and maintains a list of equipment and their locations, that can be called up in any emergency
- Compiles and maintains a list of personnel that could be called up for oil spill response at any time

15.3 On-Scene-Commander

Reports to: National or Zonal Commander as the case may be

Scope: Studies and reviews cleanup activities from historical facts of past spills within and outside Nigeria; should be constantly aware of

new developments in cleanup methods, Equipment, and materials; should possess an in-depth knowledge of the behaviour of spilled oil on land and in water, (for rivers, coastal and offshore areas) and have the ability to predict its movement; Initiates training programmes for members of the combating teams.

Specific Duties:

- Ensures proper recording of the actual movement of oil slicks and prediction of future tracks and response actions
- Constantly surveys the areas affected by the incident and evaluate the overall effectiveness of any efforts.
- recommends any corrective or additional action including equipment and manpower to the Zonal or Director General as the case may be
- Delegates various assignments as deemed fit to the response team(s)/personnel assigned to deal with any incident.
- Ensures effective communication among sub-groups involved in the combat of any incident.
- Ensures that proper liaison is maintained with cleanup contractors if any is employed.
- Works closely with OSCs in the other Zones to ensure that additional equipment, personnel and supplies as necessary are promptly obtained.
- ensures that maps, charts, etc are constantly maintained in a manner to promote efficient operation and equipment utilization.

16.0 RESPONSE PHILOSOPHY

16.1 The primary objective of a response action in an oil spill incident is to prevent/or **minimize** adverse health and safety, environmental, commercial, or social impacts by the oil spill. Other objectives are to:

- Ensure the safety of response personnel and the public.
- Secure the source of the spillage, if the spill is continuing or threatens to continue.
- Maximize oil recovery at the spill source to the best practical extent
- Contain the spill to the best practical extent, to minimize the area impacted by oil.
- Forecast spill movement and give priority to protecting environmentally, commercially or socially sensitive areas.
- Minimize the overall adverse impacts of the spill and carry out spill mitigation and restorative activities.
- Minimize environmentally induced conflict between Industries and Communities.
- Ensure a balanced decision is made as to when clean up operation should cease.

17.0 RESPONSE OPTIONS

17.1 Fate of Oil

When oil spills occur in water bodies, the primary factors which determine the slick movement are the current and wind; with the current being the most important. In the areas of petroleum activity offshore, the dominant wind is southwesterly, which would by itself tend to move the slick towards the coastline. However, the actual movement of any oil slick can generally be forecast as the resultant vector of current and wind factors calculated according to this simple rule:

Use for the wind vector, in the direction of the wind with a value of 3% of the current speed. Add this vector to the current vector which forecasts the slick movement.

Basically, oils of medium grade will:

- (i) evaporate so as to reduce the value by up to 25% in the first few hours
- (ii) emulsify over a period in excess of 24-48 hours, thereby forming mousse, increasing in mass by up to 4 times and, at the same time, reducing receptivity to dispersion by chemical dispersant and thereby making it more difficult to clean up.

17.2 Probable Fate of Oil Slicks

Oil when spilled at sea, spreads and moves on the surface and undergoes chemical and physical weathering in the process. Processes such as evaporation, dispersion, dissolution and sedimentation result in the reduction of the quantity oil on the surface of the sea. However, other processes result in the formation of water-in-oil emulsion called mousse which continues to increase in viscosity making it difficult to

disappear and thus persists. The prevailing weather and sea conditions are factors that can promote how quickly the mousse forms aside from type and quantity of oil, which further speeds up this process. Assessment of fate of oil in water reveals that there are basically two types: The non-persistent oil which tends to disappear quickly from water surface, and the persistent oil which takes a longer time to disappear.

Most of Nigerian crude oils fall into the category of light to medium crude, specific gravity 0.80 – 0.85, which converts to API gravities, 35–45 and 31–26 respectively. Pour point is about – 5°C and flashpoints range from 187°C to 237°C (in the case of refined products). It follows that any spilled oil would very easily spread on the surface of water thereby aiding quick evaporation of the light ends of the hydrocarbon. The volatility of the oil and availability of ignition sources will determine the fire risk of a spill. The viscosity and characteristics of the oil will affect the ground penetration rate of a land-based spill.

17.3 OIL SPILL RESPONSE OPTIONS

OPTION 1 Monitoring

Ensure effective surveillance by aircraft or satellite facilities if available.

- ❖ Put at alert, resources for spraying chemical dispersants and/or mechanical recovery should the need arise.
- ❖ Mobilize and put at alert, fire-fighting resources to combat unexpected fires. Identify resources at high risk
- ❖ Put at alert, resources for rescue operations should the need arise.
- ❖ Alert the NPA to divert traffic as appropriate.
- ❖ Maintain an effective communication between the command post and the combating team as well as among its members; and

also, between the command post and the national and various zonal response centres.

OPTION 2 Use of Chemical Dispersants

Action shall follow the principles set out hereunder:

- ❖ Mobilize and activate resources needed for spraying chemical dispersants (e.g.; dispersants, aircrafts/boats for dispersant spraying).
- ❖ Attempt to stop the source of the spill if applicable and possible.
- ❖ Forecast spill movement.
- ❖ Set out resources for shoreline protection and proceed to deploy booms to protect the shore, and sensitive areas and inshore facilities that might be adversely affected should the spill escape to impact the shore.
- ❖ Maintain effective surveillance throughout the spill combat.
- ❖ Continue to spray dispersants as necessary up to a satisfactory point.
- ❖ Mobilize and put at alert resources for rescue operations.
- ❖ Maintain constant communication between the command post and the zonal and national response centres.

OPTION 3 Offshore and Coastal Waters

Action will follow the principles set out here under

- ❖ Stop the source of the spill if possible; if not adopt any practicable methods to limit its flow rate and duration.
- ❖ Consider the use of dispersants.
- ❖ Take steps to contain the slick as close as practicable to its source.
- ❖ Mechanically remove it for proper disposal, using the most appropriate equipment in the stockpile.
- ❖ Forecast slick movement.
- ❖ Proceed to protect such stretches and other proximate inshore facilities or natural features that are considered sensitive.

- ❖ Prepare the beach for receipt of the oil if all other attempts fail and call for further back-up resources for shoreline protection.
- ❖ Consider the option of herding the slick, if allowed by National regulations to a hard packed sandy beach if available and practicable, where it would more easily be picked up.

When the source has been stopped and containment and removal from the water have reached the point where further removal is impracticable, stop operations if the remaining oil is weathered so as not to be dispersible.

Employ practical methods to reduce the probability of fire outbreak. If probability is high, alert and have on standby, fire fighting resources for as long as the threat exists.

If shoreline eventually gets impacted call in NOSDRA to advice on the following:

- ❖ Best methods for shoreline cleanup.
- ❖ What degree of cleanup will best enable the environment to return to its natural state in a reasonable period of time.
- ❖ Have on standby resources for rescue operations, prompt medicare for personnel.
- ❖ Maintain effective communication throughout operations.

OPTION 4 Swamp

Action will follow the principles set out hereunder:

- ❖ Stop the source of the spill if possible; if not, take such steps as are available to limit its flow rate and duration.

Concurrent with stopping or limiting the source take steps to:

- ❖ Contain the slick as close as practicable to its source

- ❖ physically remove it from containment area for proper disposal
- ❖ provide back-up protection for areas threatened should oil escape beyond the primary containment.
- ❖ In the event that the spill is likely to continue, alert or call out further resources.

If a mangrove swamp is threatened, call in a mangrove expert and attempt to divert the slick away from the swamp for removal using:

- ❖ Containment/diverting booms, skimmers, sorbents, and air barriers.
- ❖ Boat propellers, air barriers, etc. at main entrances.

If a river or estuary is threatened, deploy booms skimmers and sorbent so as to minimize:

- ❖ Impact on the adjoining banks
- ❖ Extent of advance up the river or estuary.

Employ practical methods to reduce the probability of a fire outbreak. If the probability of a fire outbreak is high, alert and have on standby fire fighting sources for as long as the threat exists.

Maintain effective communication, and have on standby resources for rescue operations, and promptly alert Medicare personnel and Disaster Management Agency for back up.

OPTION 5 Inland Areas-Land

Action will follow the principle set out below with utmost speed to prevent the oil from seeping into the ground.

- ❖ Stop the source of the spill if possible, if not take such steps as are available to limit its flow rate and duration.

- ❖ Employ the use of readily available materials to build barriers or dams around the oil spill, (use hand shovels for small barriers and earth moving equipment for large ones).
- ❖ Use natural contours to facilitate containment and to determine where best to establish collection points.
- ❖ Dig ditches as collection points if necessary, adding water before the arrival of the oil to prevent seepage.
- ❖ Consider as very high priority, mobilization of fire fighting resources.

If oil has seeped into the ground adopt the principles of recovery of oil from underground, viz.:

- ❖ Adopt the techniques of land farming if penetration is not deep
- ❖ If large quantities have seeped underground, use earth moving equipment to remove soil
- ❖ If oil has begun to migrate underground, determine where it is by use of test wells and sample pits for systematic approach to recovery.
- ❖ If oil has reached the water table adopt the appropriate geophysical methods of recovery of oil from a contaminated aquifer.
- ❖ Provide alternative clean water for communities likely to be affected by the oil spill.

OPTION 6 Inland Areas-Fresh-Water

Action will follow the principles set out below with maximum speed to prevent oil from contaminating large expanse of inland freshwater bodies.

- ❖ Stop the source of the spill if possible; if not, take such actions as are available to limit its flow and duration.

- ❖ Contain the slick as much as practicable to its source.
- ❖ Commence immediate cleanup by mechanical methods only, and physically remove it for disposal.
- ❖ Take immediate steps to remedy and substitute for whatever socio-economic imbalance caused to any human community by the incidence of the spillage.
- ❖ Ensure continuous cleanup and restorative exercise until optimum results are achieved.

OPTION 7 Other Situations

❖ Distressed Cargo Ship

If the ship has run aground, re-float the ship by adopting the principles of any of the following techniques:

- lightening
- use of tug boats
- pulling by beach gear

If the ship's tank(s) is/are ruptured, take steps to transfer the cargo to another ship. Always make readily available, resources for option (1) and/or (2) as the situation demands.

❖ Large Scale Underground Seepage of Oil

See Options 5 and 6 (which deal with spills in Inland Water Areas)

❖ In Situ Burning - permission must be obtained in advance from the Zonal Commander.

17.4 Oil Spill Accompanied By Fires

Primarily evacuate personnel and valuable resources from scene of fire. Call in the fire service. If the fire is of a nature that the conventional

service set-up cannot handle, call in technical experts from outside the country (e.g. Red Adair) to quench the fire.

17.5 Regional and International Cooperation

The Contingency Plan recognizes the need for cooperation among member states of the West African sub-region, especially our immediate neighbours, in the Gulf of Guinea, for combating oil pollution in our contiguous waters. The plan supports IMO's strategy for the protection of the marine environment, and in particular will seek to strengthen the capacity for national and regional action to **prevent, control, combat** and **mitigate marine pollution** and to promote technical cooperation to this end. The plan will also promote cooperation fully with other organizations within the United Nations and relevant international, regional and non-governmental organizations to ensure a coordinated approach to the problem and avoid wasteful duplication of efforts. Specifically this National plan will request assistance such as advisory services, technical support and equipment in accordance with applicable bilateral and international agreements for the purpose of responding to an oil pollution incident. When the severity of such incident so justifies, the National Commander will ask the International Maritime Organization to assist in selecting sources of provisional financing of the costs of responding to the oil spill incident.

The Director General (NOSDRA) could also take necessary legal or administrative measures to facilitate:

- The arrival and utilization in and departure from Nigeria of ships, aircrafts and other modes of transport engaged in responding to an oil pollution incident or transporting personnel, cargoes, materials, and equipment required to deal with such an incident, and,

- The expeditious movement into, through, and out of Nigeria, of personnel, cargoes, material and equipment.

Currently, Nigeria is a signatory to relevant international agreements such as:

- ❖ 1969 International Convention on Civil Liability of oil pollution damage.
- ❖ 1971 International Convention on the Establishment of International Fund for Compensation for Oil Pollution Damage.
- ❖ 1972 Convention on the prevention of Marine Pollution by the Dumping of wastes and other matter (ratified in 1977).
- ❖ International Convention for the prevention of Pollution from ships, 1973, as modified by the protocol of 1978.
- ❖ Convention for cooperation in the Protection and Development of the Marine and Coastal Environment of the West and Central African Region (signed 23 March, 1981).
- ❖ 1989 Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal (signed March 1990).
- ❖ 1990 International Convention on Oil Pollution Preparedness, Response and Cooperation.

This plan will form the basis for the preparation and implementation of regional and sub-regional plans for combating inter-boundary oil spills.

18.0 RESOURCE AVAILABILITY

It is important also to bear in mind that in the event of an oil spill incident, speed is the factor that can save lives and protect valuable assets. The difference in time of notification and the time spent in mobilizing and deployment of response equipment hold the ace for cost-effective response mechanism in any response plan.

Consequently, an INVENTORY of all available oil spill response equipment and necessary logistic supplies in the event of an oil spill emergency would be a routine exercise that is regularly updated at all the levels of response activities. The inventory list of equipment would include delineated locations, quantity, as well as other logistics information such as the methods of transportation and delivery periods, financial implications, names and communication particulars of contact points/persons.

18.1 Primary Spill Response Equipment: Inspection, Maintenance and Testing

Regular **operational audits**, including the inspection of equipment and the procedures for deployment, as well as periodic testing will be mandatory for all response levels. The occurrence of these operational audits will not be restricted to coincide with drills or desktop exercises.

Table 5

MINIMUM REQUIREMENT for OIL SPILL RESPONSE EQUIPMENTS

This list is not exhaustive and will be regularly updated by NOSDRA

SAFETY

- PPEs
- Area gas monitor
- Personal gas monitor
- Communication Gadgets
- Fire fighting hydrants
- First Aid kit

TRANSFER PUMPS

- Peristaltic pump
- Spate pump
- DOP 160
- DOP 250
- Framo pump systems
- Inline Hydraulic pump
- Spate 75D
- Spate 75C
- Honda Pump
- Spate 100D
- Lombadini
- German Rupp Pump (4")
- German Rupp Pump (3")

DISPERSANT APPLICATION SYSTEMS

- ADDS Pack
- NIMBUS
- Helibucket
- Simplex
- Boat Sprays
- Fluorometer

BOOMS

- Weir boom system
- Ro Skim system
- Harbour Buster
- Kepner Reel Pac
- Sentinel Boom Reel
- Shore Guardian
- 8" Permanent Floatation
- Flexi Boom
- Wire Tension
- Nofi Vee Sweep
- Ro boom
- Hi Sprint
- Harbour Buster
- Sea Sentinel Boom
- Troil Boom
- Sea Curtain
- Boom Vane

TEMPORARY STORAGE EQUIPMENT

- Inflatable Barges
- Oil bags
- Fastanks
- Waste Containment tanks
- Floating Storage Barge (100 barrels)

ANCILLARY EQUIPMENT

- High pressure washer
- Hydraulic pressure washer
- 6x6 wheel vehicle
- Portable shelters

RECOVERY DEVICES

- Mop skimmer
- Disc skimmer, capacity 40 tonnes / hour
- Disc skimmer, capacity 20 tonnes / hour

- Disc skimmer, capacity 12 tonnes / hour
- Disc skimmer, capacity 7 tonnes / hour
- Elastec groove drum skimmer
 - Mini vacuum skimmer
 - Vacuum skimmer
 - Weir skimmer, capacity 70 tonnes / hour
 - Weir skimmer, capacity 45 tonnes / hour
 - Weir skimmer, capacity 30 tonnes / hour
 - Termite combination skimmer
 - Terminator combination skimmer
 - Foilex brush and weir skimmer
 - WP130
- Rotodrum
- Sea devil
- Helix

BOATS/VESSELS

- Inflatable boats
- RIB's
- Work boat (Peter David)
- Work boat (EARLY Boats)
- EARL vessels
- Flat-bottomed (Tow Boat)
- Yamaha 115
- Mercury 115
- Yanmar Diesel 36
- Yamaha 85
- OILED WILDLIFE RESPONSE
- Wildlife Response pallets

Table 6

TIER 3

NIGERIAN NAVY
MARINE OIL SPILL OPERATIONS COMMAND
OIL SPILL RESPONSE EQUIPMENT

To be determined by the Nigerian Navy in accordance with the Command's Mission and related National Security Concerns.

Restricted and strictly confidential

Table 7

TIER 3

NIGERIAN AIRFORCE
AIRBORNE OIL SPILL OPERATIONS COMMAND
OIL SPILL RESPONSE EQUIPMENT

To be determined by the Nigerian Air Force in accordance with the Command's Mission and related National Security Concerns.

Restricted and strictly confidential

Table 8

TIER 2

**CNA OIL SPILL RESPONSE EQUIPMENT
SPECIFICATIONS**

(Revision based upon 1993 OPTS approved Upgrade)

Table 9

TIER 1

PETROLEUM INDUSTRY OIL SPILL RESPONSE EQUIPMENT

- As specified in Individual Company Oil Spill Contingency Plans (OSCPs)
- Will be regularly Audited and Tested by appropriate Zonal Commands

19.0 COMMUNICATION

19.1 The need for an effective communication network in an oil spill contingency plan cannot be overemphasized. Indeed, it is the hub on which all other components of a plan rotate.

19.2 Communication in respect of an oil spill contingency plan can be defined as “means of communicating, placing orders or directives as well as receiving information to and from those under command and control”. For success to be achieved therefore, an effective communication network must as a matter of utmost priority and a pre-requisite, be put in place.

19.3 Usually, an oil spill situation will be much more effectively managed from a Response Command and Control Centre. This Plan's organization specifies that such centres will exist both in NOSDRA National and Zonal Headquarters, which will be linked to the On-scene Commander at any spill site.

19.4 In communications, a uniform language and previously agreed terms as documented and adopted in this plan shall be used among all the tiers of oil spill contingency plans in this country to avoid critical situations and misunderstandings. The communication/emergency control centre shall have internal/external telephone installed; one of which at least shall have access to the international network and separate from the normal switchboard. There shall also be long range radio communication equipment at all centres. The radio network shall also have frequencies common to all the tiers of the plan, and specific frequencies shall be allocated and dedicated to oil spill contingency

planning. Among the frequencies, at least one shall be set aside to take priority over all others when in use.

19.5 There shall also be radio handsets, (which can hook into the switchboard at the Centre), mobile phones, fax, telex and E-mail facilities. For security, a portable satellite communication system will be required.

20.0 DISPOSAL OF RECOVERED OIL AND OILY WASTES

20.1 Oil recovered from water is likely to contain large amounts of water present as an emulsion. That recovered from shoreline, land spills, swamps etc. most probably would contain debris, solids, etc. It therefore follows that there shall be optional methods of treatment and disposal depending on the nature of the recovered oil and oily debris.

20.2 The disposal methods to be considered for oily wastes recovered should include but not limited to processing through a production facility, incineration and land treatment (land farming composting etc.), and reutilization. Prior to the various disposal methods mentioned herein, every effort shall be made to recover the spilled oil as much as possible.

20.3 It shall be the responsibility of the National Oil Spill Detection & Response Agency (NOSDRA) to ensure the appropriate treatment and safe disposal of waste oil/oily debris, in an environmentally sound manner.

21.0 RESTORATION AND POST-SPILL MONITORING

21.1 For all major spills, efforts must be made to restore or at least rehabilitate the impacted area to its original condition through inspection and certification process. The decision to initiate clean-up and restoration of oil-contaminated areas should be based on careful evaluation of socio-economic, aesthetic and ecological factors. Criteria of importance to this decision are environmental sensitivity, behavior of the oil in impacted areas, ecosystem protection, and restoration methods.

The probability of a successful restoration should be considered in line with the following:-

- ❖ Inspection and certification process shall be initiated and coordinated by NOSDRA in all cases listed below.
- ❖ Sampling and analysis of the natural resources of the contaminated areas to determine if natural recovery or restoration is the best course of action;
- ❖ If natural recovery is acceptable, an inspection and compliance Monitoring programme is initiated while the recovery program proceeds.
- ❖ If restoration is necessary, field operations are started and followed by a compliance monitoring program under the coordination of NOSDRA.

The evaluation of oil-impacted areas should consider the general qualities expressed both in physical terms e.g. sand, mud, rock, etc. and in terms of their resource value e.g. amenity, recreational, ecological, commercial and inshore fisheries etc. The assessment of natural recovery or need for restoration should also examine the time frame for such recovery or assisted recovery where necessary.

21.2 Shoreline Restoration

The most acceptable methods for clean-up and subsequent restoration of an area depend on the type of shoreline affected the nature of its economic and biological resources.

Restoration activities for such environments may involve chemical and hydraulic dispersion; steam cleaning and sandblasting; substrate mixing and/or removal of oil and contaminated materials/debris. NOSDRA shall certify the restoration of the impacted area.

21.3 Land Spills

The most effective restoration techniques often include addition of nutrients, aeration, maintenance of a neutral soil pH, tillage or mixing to break surface crusts and in very wet sites some form of drainage to remove excess water. The restoration of land sites (onshore) could be hastened by introducing micro-organism capable of degrading residual traces of oil which will otherwise take several years to degrade under natural conditions. Such restoration should only involve proven microbes in bioremediation techniques that also offer suitable growth conditions for plants and animals. For most marshlands/wetlands, transplanting of seedling plants and seeding are conventional techniques, which could be employed.

The post-spill monitoring programme would often involve visual observation, photographic documentation, and intensive scientific investigation where found necessary. A knowledge of pre-spill conditions is often invaluable for evaluation of other data relevant to the impact of oil spill. Such baseline data enable accurate evaluation and help establish a suitable monitoring programme for detailing recovery rates. The approach to, and spirit of intensive scientific study is essentially ecological. Limitations in time, manpower, equipment and funds seldom permit the utilization of numerous quantitative and experimental methods characteristic of modern ecology.

The present procedure is one in which information is derived from ecological surveys or reconnaissance as to the role of different factors in determining the impact of oil. These factors should include the role of clean-up techniques and an appraisal of the role of other pollutant sources, if any for an overall evaluation of the impact of spilled oil. The monitoring program should have a framework incorporating a monitoring schedule once the specific sites of study have been chosen. A description of the local condition, population data, identification of locally important plants/organisms, and analysis of samples of water, sediment and organisms (e.g. fish) for contaminant levels could then proceed using standard methodology.

Attempts should be made to determine the "Mass-balance" of the oil spilled. Such an exercise details the fate and distribution of oil. It can assist in defining which ecological compartment would be most vulnerable. It may also be used to stipulate future clean-up methods and identify precautions to be taken to minimize the impact of spilled oil.

22.0 IMPORTANT INTERNATIONAL AUTHORITIES

International Tankers Owners Pollution Federation Ltd. (ITOPF)

1 Oliver's Yard
55 City Road
London
EC1Y 1HQ

Tel: +44 (0)20 7566 6999

Emergency Tel: +44 (0)7623 984 606 (24hr)

Fax: +44 (0)20 7566 6950

email: central@itopf.com

International Maritime Organization (IMO)

4, Albert Embankment London SE1 7SR

Tel: + 44 207 735 7611

Fax: + 44 207 587 3210

email: info@imo.org

Oil Spill Response Ltd. (OSRL)

Head Office

One Great Cumberland Place
London, W1H 7AL
United Kingdom

Tel: + 44 (0)20 7724 0102

Fax: + 44 (0)20 7724 0103

email: london@oilspillresponse.com

Southampton Office

Lower William Street
Southampton SO14 SQE

Tel: + 44 1703 331551

Fax: + 44 1703 331972

International Oil Pollution Compensation Funds

23rd Floor

Portland House

Bressenden Place

London

SW1E 5PN

United Kingdom

Tel: + 44 (0)20 7592 7100

Fax: + 44 (0)20 7592 7111

email (for all enquiries): info@iopcfund.org

23.0 MEDIA

23.1 A Media Relations Director shall be appointed to co-ordinate and disseminate information and data during response to an oil spill incident.

24.0 COMPENSATION

24.1 All compensation claims shall be referred to the National Oil Spill Detection and Response Agency (NOSDRA).

25.0 FUNDING

25.1 It is proposed that the funds for the establishment and the continual update and maintenance of the Plan be derived from the Ecological Fund or from a newly established National Environmental Fund. Costs incurred in a spill combat shall however, be recovered from the spiller in accordance with the “Polluter Pays Principle.” For the operational logistics towards the implementation of NOSCP (Tier 3), all relevant Ministries/Agencies directly concerned shall participate in the funding arrangement.

26.0 TRAINING AND EXERCISES

26.1 Simulations

Crisis Management Training can be obtained using simulators designed/customized for training response personnel. Simulators can also double as command and control centre for co-ordinating emergency operations. When response personnel are trained on such interactive simulator, they can be exposed to other spill management systems including:-

- ❖ Realistic Oil Spill Plans
- ❖ Economic and Environmental Sensitive Area Maps
- ❖ Effective Collective, Remediation and Disposal Techniques
- ❖ State-of-art Booms Deployment and Containment and Restoration Techniques.

It shall be mandatory that each member of the response team and any other relevant personnel shall be required to possess knowledge and experience on emergency as demanded in the Plan.

To ensure effective performance by the respective individuals, the training of personnel shall be structured in order that all trainees come to understand the basics of oil spill management such as:

- ❖ Understanding the nature and characteristics of oil pollution, its fate and effects on land, water and air.
- ❖ Understanding the mechanics of slick movement and ambient factors
- ❖ Identification of potential spill sites and proactive measures
- ❖ Preventive measures and maintenance of equipment
- ❖ The various causes of an oil spill
- ❖ Different control measures and response and counter strategies

- ❖ Identification of environmentally sensitive areas/facilities
- ❖ Use of different types of equipment, including chemical dispersants
- ❖ Oil spill trajectory modelling and other Environmental Impact

Prediction Modelling Techniques

- ❖ Use of E.S.I maps, and Geographic Information System (GIS)
- ❖ Application and use of satellite imagery for spill detection and combat
- ❖ Familiar with Resource Procurement and Tracking
- ❖ Understand the role of on-the scene commander in response activities

26.2 Continuous Training

Recognizing that contingency planning becomes effective with adequate continuous training, this plan makes for:-

- ❖ Operator Training: Continuous Hands-on training shall be conducted for all operators (full time and/or casuals) in the use of spill response equipment and materials once every quarter.
- ❖ Workshops for On-Scene Coordinators: These workshops shall be organized for all zonal commanders and any other personnel deemed fit by the responsible authorities at least half yearly. And the workshops shall provide effective forum for what is considered to be the most important of pollution response training functions. The duration shall be one week and the emphasis shall be on principles of oil spill management.
- ❖ Mock Drills: Drills should be major and at least once a year, for real and desktop scenarios.
- ❖ Communications and Organization Exercises:

Periodically, communications and organization exercise shall be held to test the resources of a zone or all zones including the national center.

Also, these exercises shall be expanded to include the first and second-tier levels, and if deemed necessary by the National Commander, the international bodies as well.

26.3 Drills/Field Exercises

Efficiency of certain specialized equipment shall be evaluated through drills/field exercises. The drill is considered the backbone of any successful contingency plan. It is only then that real time assessment of the available resources (equipment) can be matched with the set objectives. Through this exercise, it will be possible to identify if additional resources (equipment and manpower) will be required in the future. Procurement of additional resources are based on this evaluation process also.

27.0 RECORDS

27.1 A NOSDRA Officer shall be designated to document all response activities at the various levels.

28.0 REVIEW AND REVISION

28.1 As a matter of policy, this plan shall be reviewed every two years. However, the Director General shall ensure that an immediate update is effected should there be a need for such reviews.

ANNEX 1
APPROVAL FORM FOR DISPERSANT USE

A. APPROVAL FOR CHEMICAL DISPERSANT USE

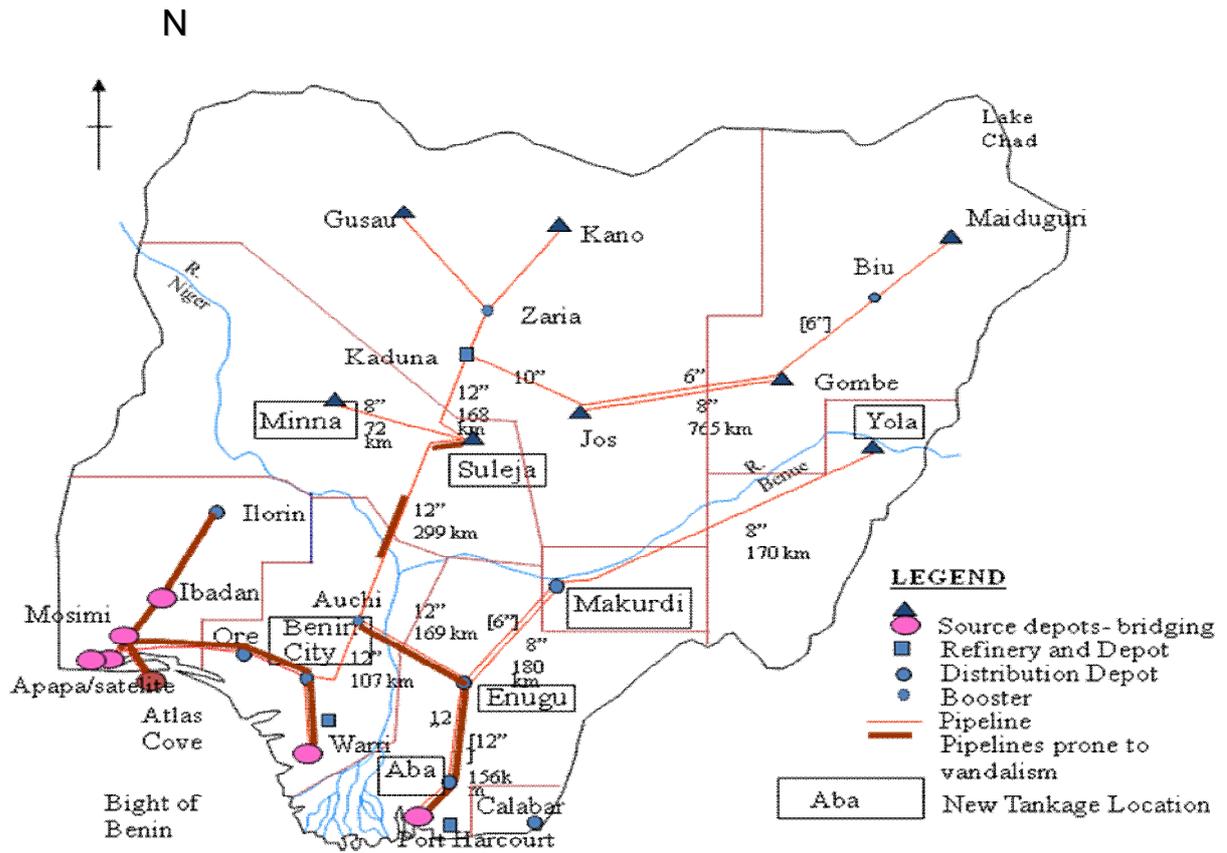
Approval for the use of dispersant is granted by the National Oil Spill Detection and Response Agency (NOSDRA) prior to use in offshore operations only.

B. USE OF CHEMICAL DISPERSANT

The approved chemical dispersants can only be used in the offshore. No dispersant may be used in the inland areas or within 10 Nautical miles from shoreline.

ANNEX 2

CRUDE OIL AND PETROLEUM PRODUCTS PIPELINE MAP OF NIGERIA



ANNEX 3

NATIONWIDE CRUDE OIL AND PETROLEUM PRODUCTS

TANKAGE PROFILES.

Warri Refining and Petrochemical Company Tankage Profile

S/No	Tank No	Service/Product	Capacity m ³
1	1	Crude	23,600
2	2	Crude	23,600
3	3	Crude	23,600
4	4	Crude	23,600
5	5	Crude	23,600
6	6	Crude	23,600
7	7	Heavy Slop	5,000
8	8	Light Slop	5,000
9	9	Naphtha	3,800
10	10	Treated Naphtha	6,200
11	11	Naphtha	10,400
12	12	Naphtha	10,400
13	13	Reformate	19,500
14	14	Reformate	19,500
15	15	FCC Gasoline	23,500
16	16	FCC Gasoline	23,500
17	17	Naphtha	16,000
18	18	PMS	10,200
19	19	PMS	10,200
20	20	PMS	13,000
21	21	PMS	13,000
22	22	Kerosene	9,000
23	23	Kerosene	18,000
24	24	Kerosene	18,000
25	25	Kerosene	16,000
26	26	Kerosene	16,000
27	27	FCC Feed	14,000
28	28	FCC Feed	17,000
29	29	Gas Oil	31,500
30	30	Gas Oil	31,500

31	31	Gas Oil	17,000
32	32	Gas Oil	17,000
33	33	Gas Oil	17,000
34	34	Fuel Oil	9,600
35	35	Fuel Oil	7,200
36	36	Fuel Oil	7,200
37	37	Fuel Oil	17,200
38	38	Fuel Oil	17,200
39	39	Fuel Oil	17,200
40	40	Leaded PMS	75
41	41	Naphtha	11,580
42	42	Naphtha	11,580
43	43	PMS	26,050
44	44	PMS	26,050
45	45	Fuel Oil	26,050
46	46	Fuel Oil	26,050
47	47	FCC Feed	33,000
48	48	FCC Feed	33,000
49	51	Propane	3,600
50	52	Propane	3,600
51	53	Butane	5,000
52	54	Butane	5,000
53	55	Butane	5,000
54	56	Butane	345
55	57	Butane	3,050
56	58	Butane	1,430
57	59	Butane	1,430
58	61	Crude	64,500
59	62	Crude	31,800
60	63	Crude	31,800
61	64	Crude	950
62	65	Crude	4,700
63	70	Alkylate	1,350
64	71	Alkylate	1,350
65	72	Alkylate	6,500
66	80	Crude	33,000
67	81	Crude	33,000
68	82	Crude	33,000
69	83	Crude	33,000

Pipelines and Products Marketing Company Plc
Nationwide Storage Tanks

I. GOMBE AREA

a) Gombe Depot Tankage Profile

Tank No.	Product	Total Capacity (m³)	Roof Type
11	PMS	5,252	FLR
12	PMS	5,247	FLR
21	PMS	2,312	FLR
22	PMS	23,140	FLR
31	DPK	2,306	FLR
32	DPK	2,306	FLR
41	AGO	3,555	FXR
42	AGO	3,544	FXR
51	AGO	172	FXR
52	Slop	172	FXR
53	Slop	171	FXR
54	Slop	171	FXR
61	Water	5,000	FXR
98	Diesel	13.50	FXR
99	Diesel		FXR

b) Jos Depot Tankage Profile

Tank No.	Product	Total Capacity (m³)	Roof Type
1	PMS	6,712	FLR
2	PMS	15,497	FLR
5	PMS	2,714	FLR
6	PMS	1,628	FLR
17	PMS	23,107	FLR
18	PMS	23,227	FLR
3	DPK	6,711	FLR
4	DPK	2,701	FLR
7	AGO	14,074	FXR
8	AGO	5,500	FXR
19	AGO	23,328	FXR
9	SLOP	338	FXR
10	SLOP	338	FXR
11	SLOP	337	FXR
12	SLOP	337	FXR

c) Maiduguri Depot Tankage Profile

Tank No.	Product	Total Capacity (m³)	Roof Type
101	AGO	8,160	FXR
102	AGO	9,530	FXR
201	DPK	9,800	FLR
202	DPK	5,587	FLR
203	PMS	5,587	FLR
204	PMS	5,587	FLR
205	PMS	9,775	FLR
206	PMS	9,775	FLR

d) Yola Depot Tankage Profile

Tank No.	Product	Total Capacity (m³)	Roof Type
101	PMS	13,000	FLR
102	PMS	13,000	FLR
103	PMS	13,000	FLR
201	DPK	7,300	FXR
202	DPK	7,300	FXR
203	DPK	7,300	FXR
301	AGO	8,000	FXR
302	AGO	8,000	FXR
303	AGO	8,000	FXR
401	SLOP	175	FXR
402	SLOP	175	FXR
403	SLOP	175	FXR
404	SLOP	175	FXR
	Water		FXR

II. KADUNA AREA

a) Gusau Depot Tankage Profile

Tank No.	Product	Total Capacity (m³)	Roof Type
1	PMS	24,691	FLR
2	PMS	24,779	FLR
3	DPK	11,557	FLR
4	DPK	11,556	FLR
5	PMS	6,055	FLR
6	PMS	6,005	FLR
7	AGO	31,851	FXR
8	AGO	31,851	FXR

b) Gusau Depot Tankage Profile

Tank No.	Product	Total Capacity (m³)	Roof Type
11	PMS	9,758	FLR
12	PMS	9,758	FLR
21	PMS	2,190	FXR
22	PMS	2,190	FXR
31	DPK	2,190	FXR
32	DPK	2,190	FXR
33	DPK	2,190	FXR
34	DPK	2,701	FXR
41	AGO	9,544	FXR
42	AGO	9,544	FXR
51	SLOP	178	FXR
52	SLOP	178	FXR
53	SLOP	178	FXR
54	SLOP	178	FXR
61	Water	6,000	FXR
98	Diesel	10	FXR
99	Diesel	17,000	FXR

c) Minna Depot Tankage Profile

Tank No.	Product	Total Capacity (m³)	Roof Type
101	PMS	8,952	FLR
102	PMS	8,940	FLR
103	PMS	8,931	FLR
201	DPK	5,124	FXR
202	DPK	5,124	FXR
203	DPK	5,029	FXR
301	AGO	8,093	FXR
302	AGO	8,041	FXR
303	AGO	8,371	FXR
401	SLOP	198	FXR
402	SLOP	198	FXR
403	SLOP	198	FXR
404	SLOP	199	FXR
	Water		FXR

d) Suleja Depot Tankage Profile

Tank No.	Product	Total Capacity (m³)	Roof Type
101	PMS	12,000	FLR
102	PMS	12,000	FLR
103	PMS	12,000	FLR
104	PMS	12,000	FLR
201	DPK	8,300	FXR
202	DPK	8,300	FXR
203	DPK	8,300	FXR
204	DPK	8,300	FXR
301	AGO	8,000	FXR
302	AGO	8,000	FXR
303	AGO	8,000	FXR
401	SLOP	213	FXR
402	SLOP	213	FXR
403	SLOP	213	FXR
404	SLOP	213	FXR
	Water		FXR

III.MOSIMI AREA

a) Atlas Cove Depot Tankage Profile

Tank No.	Product	Total Capacity (m³)	Roof Type
11	PMS	19,315	FLR
12	PMS	25,297	FLR
21	PMS	9,230	FLR
31	DPK	17,010	FLR
32	PMS	16,450	FLR
41	AGO	16,300	FXR
42	AGO	16,300	FXR
51	Bunker	1,270	FXR
61	Bunker	3,459	FXR
81	SLOPE	5	FXR
82	SLOPE	5	FXR
95	Water	67	FXR

b) Ibadan Depot Tankage Profile

Tank No.	Product	Total Capacity (m³)	Roof Type
11	PMS	20,700	FLR
12	PMS	20,670	FLR
13	PMS	20,730	FLR
14	PMS	20,730	FLR
21	PMS	9,950	FLR
22	PMS	9,950	FLR
31	DPK	7,185	FLR
32	DPK	7,185	FLR
33	DPK	7,185	FXR
34	DPK	9,100	FXR
41	AGO	9,100	FXR
42	AGO	9,100	FXR
43	AGO	9,100	FXR
44	AGO	9,100	FXR
51	SLOP	375	FXR
52	SLOP	375	FXR
53	SLOP	375	FXR
54	SLOP	375	FXR
61	Water	6,372	FXR

c) Ilorin Depot Tankage Profile

Tank No.	Product	Total Capacity (m³)	Roof Type
11	PMS	9,925	FLR
12	PMS	9,975	FLR
21	PMS	9,919	FLR
22	PMS	2,331	FXR
31	DPK	2,332	FXR
32	DPK	2,332	FXR
33	DPK	2,333	FXR
41	AGO	10,019	FXR
42	AGO	9,983	FXR
51	SLOP	189	FXR
52	SLOP	197	FXR
53	SLOP	198	FXR
54	SLOP	197	FXR
61	Fire	200	FXR
98	Diesel	1,000	FXR
99	Diesel		FXR

d) Mosimi Depot Tankage Profile

Tank No.	Product	Total Capacity (m³)	Roof Type
11	PMS	23,715	FLR
12	PMS	23,725	FLR
13	PMS	23,725	FLR
14	PMS	23,710	FLR
15	PMS	23,710	FLR
16	PMS	23,835	FLR
21	PMS	4,678	FXR
22	PMS	16,555	FLR
41	ATK	2,834	FLR
42	ATK	2,858	FLR
43	ATK	2,904	FLR

44	DPK	19,220	FLR
45	DPK	19,230	FLR
46	DPK	19,220	FLR
47	DPK	19,135	FLR
51	AGO	23,090	FXR
52	AGO	23,080	FXR
53	AGO	23,065	FXR
54	AGO	23,074	FXR
55	AGO	23,108	FXR
56	AGO	9,786	FXR
61	Water	6,080	FXR
71	SLOP	542	FXR
72	SLOP	542	FXR
73	SLOP	542	FXR
74	SLOP	542	FXR
98	Diesel	202	FXR
99	Diesel	1,515	

e) Ore Depot Tankage Profile

Tank No.	Product	Total Capacity (m³)	Roof Type
11	PMS	11,190	FLR
12	PMS	11,210	FLR
21	PMS	1,645	FLR
22	PMS	1,650	FLR
31	DPK	3,010	FLR
32	DPK	3,010	FLR
41	AGO	5,275	FXR
42	AGO	5,280	FXR
51	SLOP	341	FXR
52	SLOP	342	FXR
53	SLOP	341	FXR
54	SLOP	341	FXR
61	Water	5,089	FXR
98	Diesel	1,515	FXR
99	Diesel	101	FXR

f) Satellite Depot Tankage Profile

Tank No.	Product	Total Capacity (m³)	Roof Type
11	PMS	5,126	FLR
12	PMS	5,127	FLR
21	PMS	878	FLR
22	PMS	878	FLR
31	DPK	999	FLR
32	DPK	999	FLR
41	AGO	5,942	FXR
42	AGO	5,939	FXR
51	SLOP	65	FXR
52	SLOP	65	FXR
61	Water	5,089	FXR
98	Diesel	10.1	FXR
99	Diesel	1.516	FXR

IV. WARRI AREA

a) Benin Depot Tankage Profile

Tank No.	Product	Total Capacity (m³)	Roof Type
11	PMS	13,307	FLR
12	PMS	11,654	FLR
13	PMS	14,941	FLR
14	PMS	13,822	FLR
21	PMS	2,806	FLR
22	PMS	2,806	FLR
31	DPK	3,073	FLR
32	DPK	3,073	FLR
33	DPK	12,283	FXR
34	DPK	10,016	FXR
41	AGO	12,200	FXR
42	AGO	12,200	FXR
43	AGO	8,328	FXR
51	SLOP	344	FXR
52	SLOP	344	FXR
53	SLOP	344	FXR
54	SLOP	344	FXR
61	Water	5,089	FXR
98	Diesel	10.1	FXR
99	Diesel	1.6	FXR

b) Escravos Depot Tankage Profile

Tank No.	Product	Total Capacity (m³)	Roof Type
101	Escravos Light Crude	62,446	
102	Arabian Light Crude	624,493	
103	Arabian Light Crude	62,815	
104	Escravos Light Crude	62,990	
105	SLOP	1,950	
106	AGO Utility	2,015	
107	Escravos Light Crude	61,165	
111	AGO Utility	6,405.6	

V. PORT HARCOURT AREA

a) Aba Depot Tankage Profile

Tank No.	Product	Total Capacity (m³)	Roof Type
101	PMS	1,039	FLR
102	PMS	1,039	FLR
103	DPK	3,814	FLR
104	DPK	3,809	FLR
105	DPK	2,060	FXR
201	AGO	7,738	FXR
202	AGO	7,753	FXR
203	AGO	14,500	FXR
204	AGO	15,433	FXR
301	PMS	9,792	FLR
302	PMS	9,629	FLR
307	PMS	20,539	FLR
308	PMS	20,596	FLR

b) Calabar Depot Tankage Storage

Tank No.	Product	Total Capacity (m³)	Roof Type
1	PMS	10,600	FLR
11	PMS	10,700	FLR
21	DPK	10,100	FLR
31	AGO	10,300	FXR
41	AGO	10,200	FXR
51	SLOP	30	HCR
52	SLOP	30	HCR
61	Water	9,800	FXR
98	Diesel		HCR
99	Diesel		VCR

c) Port Harcourt Refinery Tankage Profile

Tank No.	Product	Total Capacity (m³)	Roof Type
55A	PMS	1,593	FLR
55B	PMS	1,593	FLR
56A	PMS	3,097	FLR
56B	PMS	3,097	FLR
58A	DPK	1,594	FLR
58B	DPK	1,594	FLR
60A	AGO	1,970	FXR
60B	AGO	1,970	FXR

d) Enugu Depot Tankage Profile

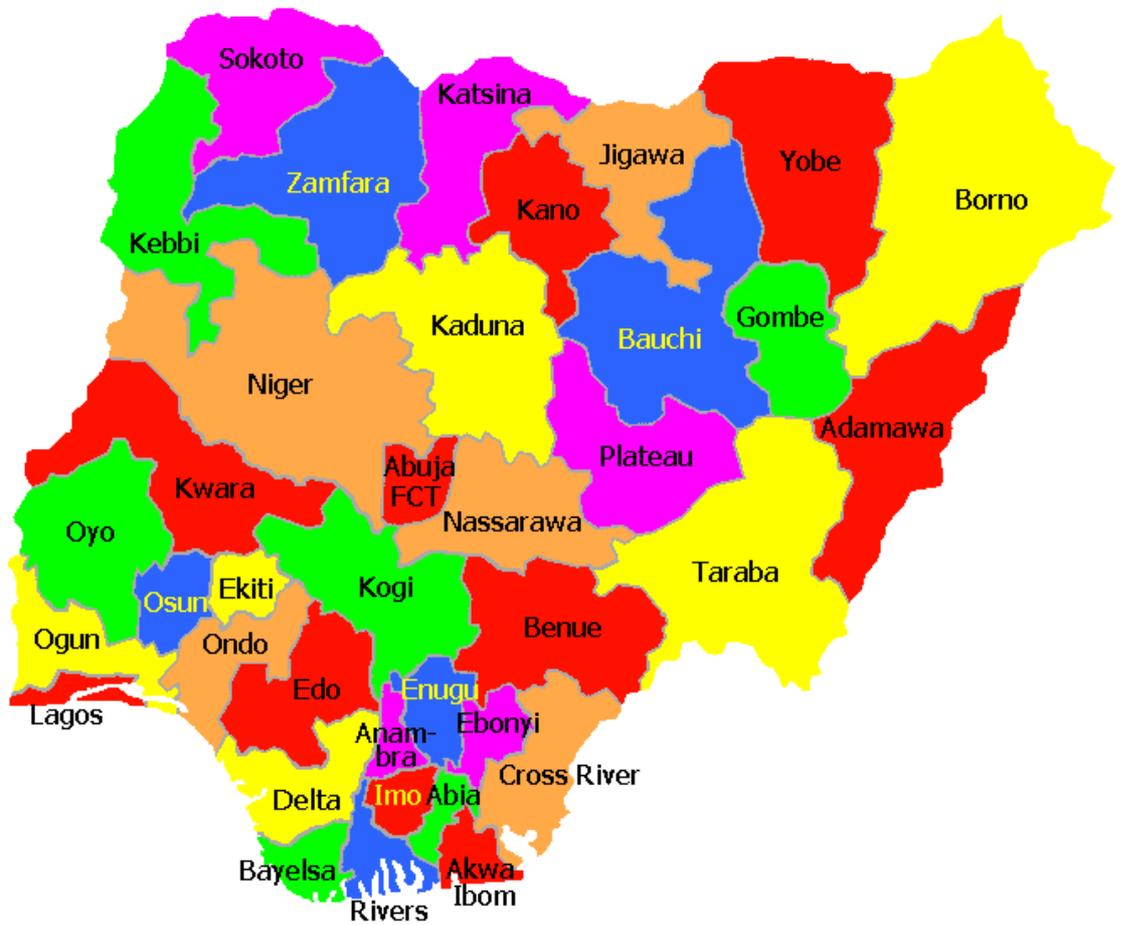
Tank No.	Product	Total Capacity (m³)	Roof Type
101	PMS	1,445	FLR
102	PMS	2,550	FLR
103	PMS	2,540	FLR
104	DPK	5,000	FLR
105	DPK	5,000	FLR
106	DPK	5,000	FLR
107	DPK	5,000	FLR
108	DPK	10,831	FXR
109	DPK	10,847	FXR
110	DPK	10,853	FXR
201	PMS	23,450	FXR
202	PMS	23,565	FXR
208	PMS	17,000	FLR
209	PMS	15,000	FLR
210	PMS	15,000	FLR
304	AGO	12,826	FXR
305	AGO	12,828	FXR
306	AGO	12,825	FXR

e) Makurdi Depot Tankage Profile

Tank No.	Product	Total Capacity (m³)	Roof Type
101	DPK	7,619	FLR
102	DPK	2,241	FLR
103	DPK	2,241	FLR
104	DPK	8,073	FXR
105	DPK	8,073	FXR
201	DPK	9,442	FXR
202	DPK	9,200	FXR
203	DPK	9,200	FXR
208	DPK	5,195	FXR
301	PMS	10,103	FLR
302	PMS	10,103	FLR
303	PMS	7,230	FLR
304	PMS	7,230	FLR
305	PMS	1,355	FLR
306	PMS	1,355	FLR
307	PMS	14,555	FLR
308	PMS	8,415	FLR

ANNEX 4

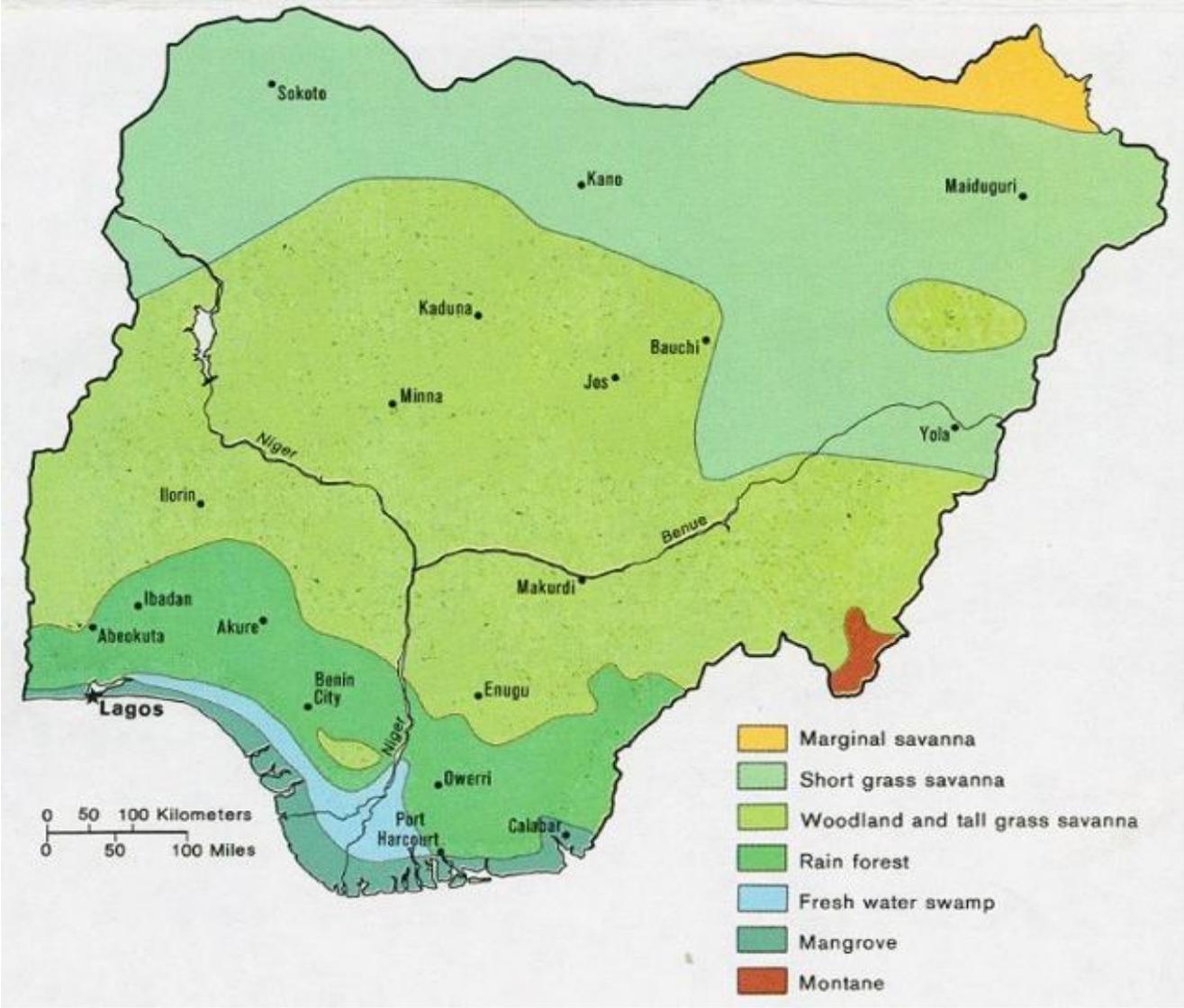
GEOGRAPHICAL AREA COVERED BY THIS PLAN



ANNEX 5

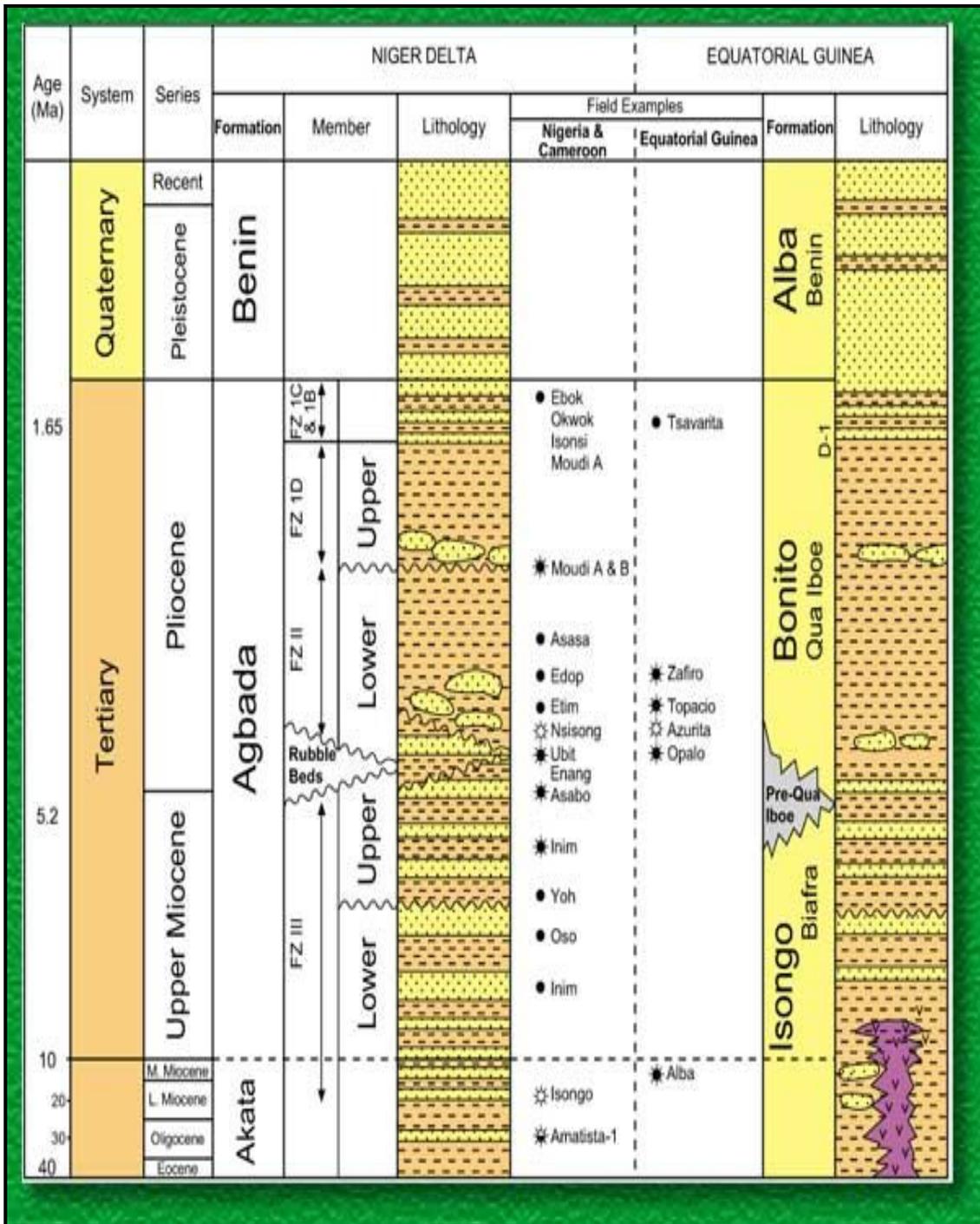
TIDAL TABLES

ANNEX 6
VEGETATION MAP OF NIGERIA



ANNEX 7

THE STRATIGRAPHY OF THE NIGER DELTA



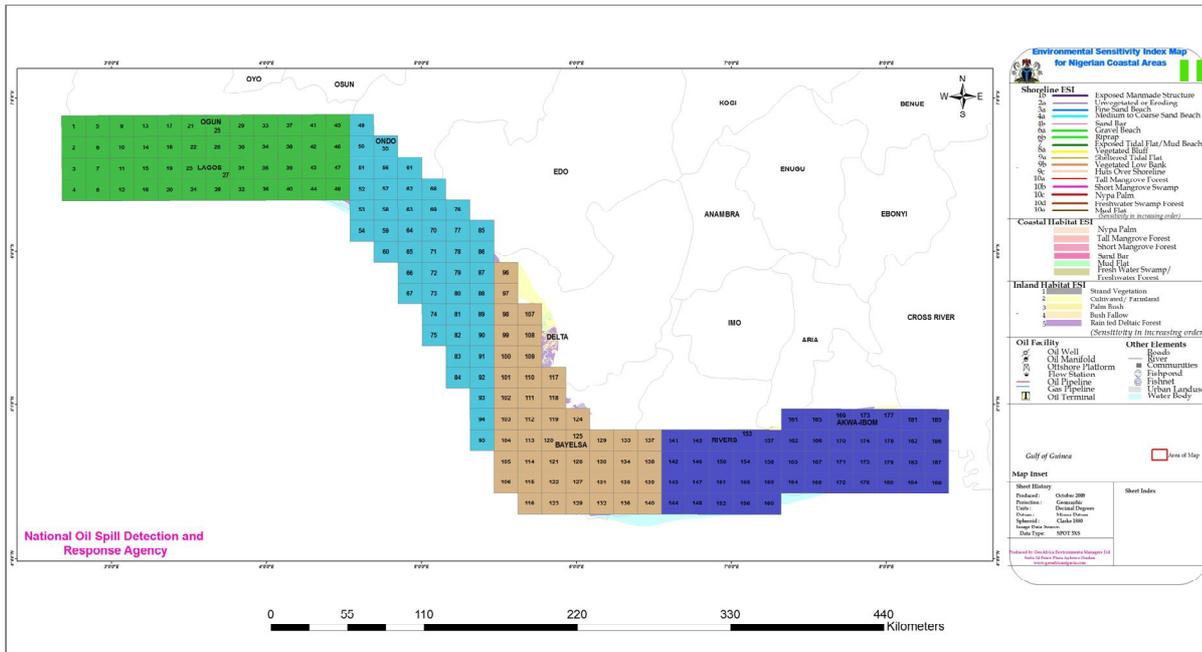
ANNEX 8

STRUCTURAL ELEMENTS IN THE NIGER DELTA GEOLOGY



ANNEX 9

ENVIRONMENTAL SENSITIVITY INDEX (ESI) MAPS



Environmental Sensitivity Index Maps of the Nigerian Coastline (from Badagry to Calabar 50km inland) are available from the National Oil Spill Detection & Response Agency (NOSDRA).

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10	FEDERAL RADIO CORPORATION OF NIGERIA (FRCN)	Area 11, Garki, Abuja	
11	Africa independent television (AIT)	Efenji Efenji	07034372621
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ANNEX 11

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Telephone/Mobile No. _____

10. Inspector-General of Police

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E-mail Address _____

Telephone/Mobile No. _____

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Telephone/Mobile No. _____

12. Honourable Minister, Federal Ministry of Interior

Name _____

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13. Honourable Minister, Federal Ministry of Transport

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ANNEX 12

REFERENCES

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17. *Murday M. and E. R. Gundlach, February 1990, Oil Spill Contingency Plan for Mauritius: Prepared for the Ministry of Housing, Land and Environment, Government of Mauritius, The International Maritime Organization and The United Nations Environmental Programme*
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and Central African Region: Protocol Concerning Co-operation in Combating Pollution in Cases of Emergency: United Nations Environment Programme, Nairobi, Kenya.

23. *U.S. Environmental Protection Agency, 1977, Oil Spill: decisions for Debris Disposal, Report No. EPA-600/2-77-153a: US EPA, Cincinnati, Ohio, U.S.A.*

ANNEX 13

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Abuja

4. The Honourable Minister
Ministry of Defence
Abuja

5. Chief of Army Staff
The Nigerian Army
Lagos

6. Chief of Naval Staff
The Nigerian Navy
Lagos

7. Chief of Air Staff
The Nigerian Air Force
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13. The Honourable Minister
Ministry of Lands, Housing and Urban Development
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14. The Honourable Minister
Ministry of Culture
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15. The Honourable Minister
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Abuja

19. The Honourable Minister
Ministry of Aviation
Abuja

20. The Honourable Minister
Federal Ministry of Science and Technology
Abuja
21. The Honourable Minister
Ministry of Interior
Abuja
22. The Honourable Minister
Federal Ministry of Health
Abuja
23. The Honourable Minister
Federal Ministry of Information and Communications
Abuja
23. The Honourable Minister
Ministry of Water Resources
Abuja
24. The Honourable Minister
Ministry of Women Affairs
Abuja
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Lagos

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National Emergency Management Agency (NEMA)
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28. The Director General
National Boundary Commission
Abuja
29. The Director General
Department of State Security
Abuja

30. The Director General
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Abuja
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Department of Petroleum Resources (DPR)
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33. The Managing Director
Niger-Delta Development Commission
Port Harcourt, Rivers State
34. Managing Director
The Nigerian Ports Authority Plc.
Lagos
35. The Conservator General
National Parks
Abuja
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Abuja
37. The Director
Environmental Assessment Department
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Abuja

39. Secretary to the Government
Governor's Office
Port Harcourt
40. Secretary to the Government
Governor's Office
Owerri
41. Secretary to the Government
Governor's Office
Uyo
42. Secretary to the Government
Governor's Office
Calabar
43. Secretary to the Government
Governor's Office
Asaba
44. Secretary to the Government
Governor's Office
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45. Secretary to the Government
Governor's Office
Benin City
46. Secretary to the Government
Governor's Office
Umuahia
47. Secretary to the Government
Governor's Office
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48. Secretary to the Government
Governor's Office
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49. Secretary to the Government
Governor's Office
Kaduna
50. Secretary to the Government
Governor's Office
Maiduguri
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52. General Manager
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67. The Managing Director,
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Capital Oil and Gas Industries Ltd,
1, Capital Oil Close,
Westminster Ibru Jetty Complex,
P.O. Box 588
Apapa, Lagos.

118. The Managing Director,
Philips Oil Company Nigeria Ltd,
IBTC Place,
Walter Carrington Crescent,
Victoria Island - Lagos.

119. The Managing Director,
Walter Smith Petroleum Oil Ltd,
18, Keffi Street,
Ikoyi - Lagos.

120. The Managing Director,
Paragon Petroleum Ltd,
8th Floor ICON House,
Plot 999 -F, Idejo Street,
Off Adeola Odeku Street
Victoria Island - Lagos.

121. The Managing Director,
Solgas Petroleum Limited,
1st Floor Fortune Towers,
27/29 Adeyemo Alakija Street,
Victoria Island - Lagos.

122. The Managing Director
ADDAX Petroleum Development Nig. Ltd
Ozumba Mbadiwe Avenue
Victoria Island, Lagos.
Attention: B. Oghor (General Manager, HSE)

123. The Managing Director,
Universal Energy Resources Ltd,
25, Idoro Road,
Uyo - Akwa Ibom State.

124. The Managing Director,
Warri Refining and Petrochemical Company (WRPC),
Warri - Delta State.

125. The Managing Director,
Port Harcourt Refining Company
Port Harcourt

126. The Managing Director
Kaduna Petrochemical Refining Company
Kaduna

127. The Managing Director
Eleme Petrochemical Company Ltd
Eleme
Port Harcourt

128. The Group Managing Director
Nigeria National Petroleum Corporation
NNPC Towers
Abuja
Attn: G. E. D (Refineries)

129. The Managing Director
Pipelines and Products Marketing Company
Block C, 6th Floor
NNPC Towers
Abuja

130. The Executive Director
Moni Pulo Limited
(Petroleum Development)
5 Odoni Street
Amadi Flats, Port Harcourt
Attn: Chief Operating Officer

131. The Managing Director

Frontier Oil Limited
32B Bori Road
Romuibekewe HSG Estate
Port Harcourt, River State
Attn: Project Director

The Managing Director,
Frontier Oil Ltd
9C, Joseph Adu Street
Oriru Private Estate
Victoria Island
Lagos.

132. The Managing Director

Nigerian Petroleum Development Company
62164 Sapele Road, P.M.B 1262
Benin City

133. The Managing Director

Niger Delta Petroleum Resources Ltd
15B Festival Road
P. O. Box 73880
Victoria Island, Lagos

134. The Managing Director

Consolidated Oil Production Ltd

Plot 289 Ajose Adeogun

Victoria Island, Lagos

135. The Managing Director

Amni International Petroleum Development Co. Ltd

1st Thomas Close, Off Nkpokgu Road

Trans – Amadi, Port Harcourt. River State

136. The National Chairman

Joint Oil Mineral Umbrella Bodies

Executive Committee (JOMUBEC)

P. O. Box 1, Igbokoda

Ilaje Local Government Area

Ondo State

137. The Chairman (OPTS)

Plot 35, Kofi Abayomi Crescent

Victoria Island, Lagos

Attn: Carol Antiah

Mobil Producing Unlimited

Environment and Safety Sub- Committee

138. The Chairman

Clean Nigeria Associates (CNA)

Fire Building Rooms 1 And 2

SPDC Kidney Island

Port Harcourt

139. The President

Nigerian Association of Indigenous Petroleum Explorers and Producers

179, Moshood Olugbani Street

Victoria Island Extension

Victoria Island, Lagos

140. General Manager

Clean Nigeria Associates (CNA)

Lagos

141. Managing Director

CNA Contractor

Lagos

142. Base Manager

CNA Base

Port Harcourt

143. Base Manager

CNA Base

Warri

144. Base Manager

CNA Base

Kaduna

145. Base Manager

CNA Base

Calabar

146. Base Manager

CNA Base

Brass

147. The Director General

Nigerian Meteorological Agency

Lagos

147. The Honorable Commissioner

Ministry of Special Duties

Environment and Mineral resources

Governor's Office

Akure, Ondo state

148. The Honorable Commissioner

Ministry of Agriculture & Natural Resources

Owerri - Imo state

149. The Honorable Commissioner

Ministry of Environment

Calabar, Cross-Rivers State.

150. The Honorable Commissioner

Ministry of Environment & Mineral Resources

8, Okpon Street, Uyo, Akwa Ibom State

151. The Honorable Commissioner

Ministry of Environment

Eric Isichei Street, Behind Detla Line Workshop

Asaba, Delta State

152. The Honorable Commissioner
Ministry of Environment
Port Harcourt,
Rivers State

153. The Honorable Commissioner
Ministry of Environment
Benin City, Edo State

154. The Honorable Commissioner
Ministry of Environment
Umuahia
Abia State

155. The Honorable Commissioner
Ministry of Environment
Yenagoa
Bayelsa State

156. The Managing Director
Niger Delta Development Commission
Aba Expressway
Port Harcourt

157. **The Managing Director,**
Centrica Resources (Nig) Ltd
3rd Floor, Africa RE Building
Plot 1679, Karimu Kotun Street
Victoria Island, Lagos.

158. **The Managing Director,**
Cavendish Petroleum Nigeria Ltd,
22, Adeleke Adedoyin Street,
Off Kofo Abayomi Street,
Victoria Island - Lagos.

159. **The Managing Director,**
Zenon Petroleum & Gas Ltd.,
7, Tiamiyu Savage Street,
Victoria Island,
Lagos
160. **The Assistant Manager Admin and Personnel,**
Ibafon Oil Ltd.,
Ibru Yard,
Oshodi-Apapa Expressway,
Warehouse Bus-stop, Near Tincan Island Port,
Lagos State.
161. **The Managing Director,**
Platform Petroleum Limited,
Suite 300A Bankers House,
19, Adeola Hopewell Street,
Victoria Island,
Lagos.
162. **The Managing Director,**
Oriental Energy Resources Limited,
No.22, Ubuma Street, Maitama,
Abuja.
- The Managing Director,**
Oriental Energy/Afren,
1st Floor, Octagon Building,
13A, Marinho Drive,
Victoria Island,
Lagos.
163. **The Managing Director,**
Seplat Petroleum Development Company Limited,
25a, Lugard Avenue, Ikoyi,
Lagos.

164. **The Managing Director,**
Eterna Oil and Gas Plc.,
5A, Second Avenue, Ikoyi,
P.O.Box 5647, Marina,
Lagos.
165. **The Managing Director,**
Integrated Oil and Gas Ltd.,
41, Itapeju Street,
P.O.Box 1148,
Apapa, Lagos.
166. **The Managing Director,**
Swift Oil Ltd.,
Plot 238B, Ajose Adeogun Street,
P.O.Box 74692,
Victoria Island, Lagos.
167. **The Managing Director,**
Tonique Oil Services Ltd.,
Plot 31A, Gafar Animashaun Street,
Off Ajose Adeogun Street,
Victoria Island, Lagos
168. **The Managing Director,**
Denver Petroleum Services Ltd.,
13, Raymond Njoku Street,
South West Ikoyi,
Lagos.
169. **The Managing Director,**
Eskay Petroleum Limited,
18, (Plot 19), Badejo Akinyemi Crescent,
Off Fatai Atere Way,
Matori Industrial Estate,
Lagos.

170. **The Managing Director,**
Ine Oil Ltd,
Km 14, Lekki – Epe Expressway,
Near VGC, Ikota,
Lagos.
171. **The Managing Director,**
Kruksland Petrogas Nig.Ltd.,
Maku Plaza, 4th Floor,
109, Awolowo Road,
Ikoyi, Lagos.
172. **The Managing Director,**
Sadiq Petroleum Nig. Ltd.,
Plot 278, Ajose Adeogun Street,
Victoria Island, Lagos.
173. **The Managing Director,**
Nigerian Independent Petroleum Company Plc. (NIPCO),
1 & 15 Dockyard Road,
P.O.Box 2388, Apapa,
Lagos.
- 174 **The Managing Director,**
BG Exploration & Production Nig. Ltd.,
11A, Osborne Road,
Off Alfred Rewane Road,
Ikoyi Lagos.
175. **The Managing Director,**
Associated Oil and Gas Ltd.,
293, Akin Olugbade Street,
Victoria Island,
Lagos.
- 176 **The Managing Director,**
Millennium Oil and Gas Company Ltd.,
4, Tokumbo Omisore Street,
Off Wole Olateju Street,
Lekki Phase 1, Lagos.

177. The Managing Director,
Esso Exploration and Production Nigeria Ltd,
Exxon Mobil,
Ozumba Mbadiwe Street,
Victoria Island - Lagos.

178. **The Managing Director,**
South Atlantic Petroleum Ltd.,
South Atlantic Petroleum Tower,
7 (Plot 98) Adeola Odeku Street,
P.O.Box 73152,
Victoria Island, Lagos.

179. DEE JONES PETROLEUM & GAS
Beachland Industrial Estate,
Kirikri phase I,
Apapa, Lagos

180 AQUITANE OIL & GAS LTD.
IBRU Jetty , Ibafo,
Apapa, Lagos.

181. TECHNO OIL & GAS LTD
2A, Dr. Lawrence Omole close,
Victoria Island, Lagos.

DEPOT OFFICE
Mosheshe Industrial Avenue,
Kirikiri Phase II, Apapa

182. TOTAL/ OANDO JV
8, Kayode Street,
Marine Beach,
Apapa, Lagos.

183. LISTER OIL LTD.
21, Creek Road,
Apapa, Lagos.

184. The Chairman,
First Hydrocarbon Company Nigeria Limited,
Plot 1355 (No.35),
T.Y.Danjuma Street,
Cadastral Zone A4,
Asokoro, FCT,
Abuja.

185. Include NGOs

186. Include all LGAs