



Interlocutory application

Federal Court of Australia

No. VID 647 of 2023

District Registry: Victoria

Division: Administrative and Constitutional Law and Human Rights

RAELENE COOPER

Applicant

**NATIONAL OFFSHORE PETROLEUM SAFETY AND ENVIRONMENTAL MANAGEMENT
AUTHORITY and others named in the Schedule**

Respondents

To the Respondents

The Applicant applies for the interlocutory orders set out in this application.

The Court will hear this application, or make orders for the conduct of the proceeding, at the time and place stated below. If you or your lawyer do not attend, then the Court may make orders in your absence.

Time and date for hearing:

Place:

Dated: 2023

Signed by an officer acting with the authority
of the District Registrar

Filed on behalf of Raelene Cooper, Applicant

Prepared by Clare Lakewood

Law firm Environmental Defenders Office

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Fax _____

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Ref _____

Address for Service **Environmental Defenders Office**, Suite 8.02 Level 8/6 O'Connell St, Sydney
NSW 2000



Interlocutory orders sought

1. Pursuant to r 1.34 and/or 1.39 of the *Federal Court Rules 2011 (Rules)*, to the extent necessary, orders *nunc pro tunc* dispensing with the requirements of, and/or shortening the time required under, r 17.01(2) of the Rules.
2. Pursuant to s 23 of the *Federal Court of Australia Act 1976*, an order in the nature of an interlocutory injunction restraining the Second Respondent and Third Respondent (collectively, the **Titleholders**) from undertaking any activity as described in the Environment Plan (Scarborough 4D B1 Marine Seismic Survey Environment Plan, Revision 7, June 2023) to undertake a three-dimensional (3D) marine seismic survey (MSS) within the Northern Carnarvon Basin on the Exmouth Plateau the Barossa Development Drilling and Completions Program (**Seismic Survey EP**) until the hearing and determination of this proceeding or until further order.
3. Costs.
4. Such further or other orders as this Court thinks fit.

Service on the Respondents

It is intended to serve this application on all Respondents.

Date: 7 September 2023

A handwritten signature in black ink, appearing to read 'Clare Lakewood'.

Signed by Clare Lakewood
Lawyer for the Applicants

**Schedule**

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Respondents

Second Respondent:

WOODSIDE ENERGY SCARBOROUGH PTY LTD
ACN 650 177 227

Third Respondent:

WOODSIDE ENERGY (AUSTRALIA) PTY LTD
ACN 006 923 879