



4 May 2009

The Shell Company of Australia Limited

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Mr John Rouw,  
Adjudication Branch  
Australian Competition & Consumer Commission  
GPO Box 520  
MELBOURNE Vic 3001

Dear Sir,

We refer to Gavin Jones' letter of 22 April 2009 seeking submissions on the Woodside Energy Ltd/Benaris International Pty Ltd application for authorisation.

Shell's view is that the proposed joint marketing arrangements would not adversely affect competition.

The Victorian LPG market is the most competitive in Australia with a number of independent suppliers able to offer LPG at a variety of supply points located in and around the greater Melbourne metropolitan area.

The production volume from the Otways field, amounting to approximately 5% of total production in Victoria, is not sufficient to affect the LPG market in a material way. It should, however, provide:

- another potential supply point for the South Australian market where there is currently only one supplier; and
- a geographic supply hub for western Victoria providing benefits in terms of reduced freight costs to that market;

and if joint marketing facilitates this production being brought to market, then this should make a positive contribution to a competitive market.

Yours sincerely,

**Peter Weston**  
General Counsel

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