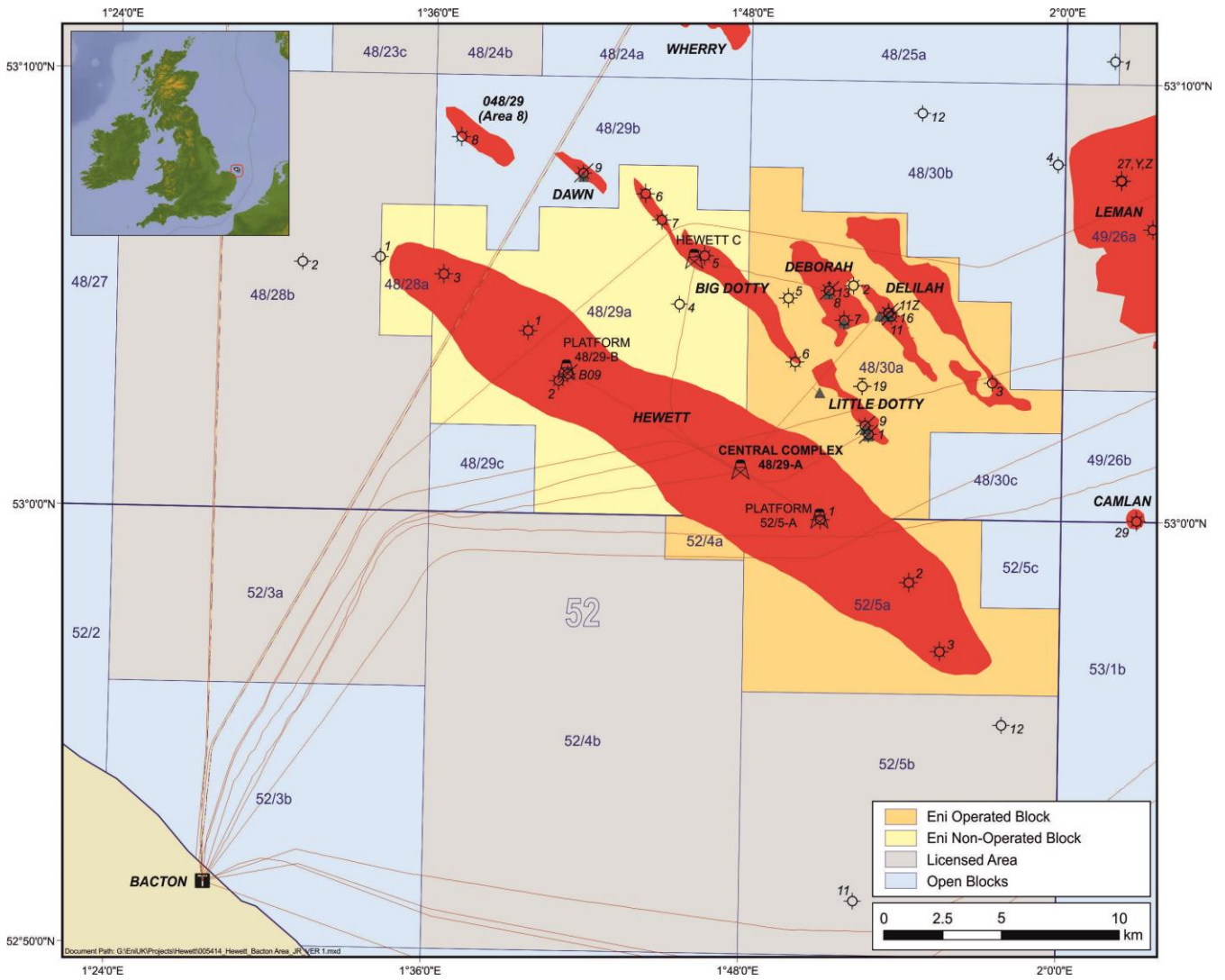




Eni Hewett Limited OSPAR Public Statement 2015 Environmental Performance Hewett Field Area



Introduction

This is the 2015 OSPAR Public Statement for Eni Hewett Limited which is a wholly owned subsidiary of Eni UK Limited. The statement reports the environmental performance of Eni Hewett's operations and activities in the Hewett Field during 2015, in line with the requirements of OSPAR Recommendation 2003/5. The scope focuses on our offshore assets as described below. These assets do not produce through any third party offshore assets or operations.

Hewett Field Offshore Activities

During 2015 Eni Hewett, as License holder of the Hewett Field, continued production from subsea and platform wells via the offshore platforms comprised of the Central Complex (49/28A-P, FTP & Q [see photograph below]) and the satellite platforms (52/5A, 48/29B and 48/29C). Petrofac Offshore Engineering and Operations continued to operate and maintain the Hewett Field installations and Infrastructure on behalf of Eni Hewett, as the appointed Duty Holder. During 2015 the Central Complex was permanently manned while the satellite installations were operated as Not Permanently Attended Installations (NPAI), which are normally controlled from the Central Complex or the onshore control room located at the Bacton Terminal. Operations during 2015 consisted of normal production and ongoing maintenance.



Eni Hewett HSE Policy

Eni Hewett Ltd adopts the Eni UK Ltd HSE policy which sets out the principles to which Eni Hewett activities aim to comply. These include:

- ✓ Promoting Health, Safety and Environmental Protection;
- ✓ Seeking and achieving continual improvement;
- ✓ Compliance with all regulatory requirements.

The requirements of the Policy are implemented through management systems, interface arrangements and operational management controls. The Eni UK policy is provided overleaf.



The safety and health of eni's people, of the community and of its partners and the protection of the environment are top priorities for eni in all its activities

eni conducts its activities in accordance with international agreements and standards, with the law, with regulations and with the national policies of the countries where eni works, that deal with the safeguard of health and safety of workers and of the environment.

eni manages health, safety and environmental protection in an integrated manner, in accordance with the principles of precaution, prevention, protection and continuous improvement, with responsibilities assigned to all levels of personnel in the company.

eni, in company activities, uses the most advanced technologies and technical regulations in health, safety and environmental matters.

eni plans, develops, manages and disposes of its tangible assets in ways that ensure the safeguarding of health and safety, the minimisation of environmental impacts and the optimisation of the use of energy and natural resources.

eni invests in research and in technological innovation, in order to develop products and processes with optimal standards of environmental performance and for the highest levels of health and safety protection and promotes partnerships with the aim of developing new technologies.

eni considers the protection of health a fundamental requisite and promotes the psychological and physical well-being of its people.

eni communicates to its stakeholders, in a transparent manner, the objectives and results that have been achieved in relation to health, safety and environmental management and promotes conditions which aid long term cooperation, with the aim of achieving shared objectives of sustainable development.

eni promotes the development and production of products which are safe and eco-compatible. It also provides clients with the necessary information for their correct use.



eni UK endorse eni SpA 'health, safety and environment' Policy and commits to adopt it in all its operations

September 2013

Philip Hemmens
Managing Director eni UK

HSE Management System

Eni UK's Environmental Management System is Certified to ISO 14001:2004 by ERM CVS (see copy of certificate below). Eni Hewett is a wholly owned subsidiary of Eni UK and adopts the Eni Group/Eni UK Health, Safety and Environmental Management System, which sets out guiding principles and mechanisms for managing HSE risk, impact and compliance in accordance with the Eni UK Health, Safety and Environment Policy.

A formalised and documented HSE Management System Interface is in place between Eni and Petrofac to provide the mechanism for implementing Eni requirements through Petrofac's HSE and Operational management systems, to manage and control operational activities. Routine communications between Eni Hewett and Petrofac are planned and maintained to review management arrangements, plans and performance to ensure requirements are being complied with and reported in line with Regulatory and Company requirements.



Key HSE Management Activities in 2015

Eni Hewett’s key environment related objectives and activities for 2015 were to ensure compliance with all environmental permits and relevant regulations and to progress a number of programmes to support continued improvement in performance, including:

- Successful maintenance of the Duty Holder’s ISO 14001 EMS certification;
- Completion of scheduled offshore EMS audits and inspections;
- Completion of Onshore Emergency Response exercises and Offshore Drills;
- Monitoring of asset performance and Environmental KPIs covering resource use and emissions to the environment;
- Maintenance of the trained E-Reps in place for all assets;
- Duty of Care audit of waste management processes and contractor;
- Successful completion of an Energy Audit of the Hewett Installations.

Atmospheric Emissions

Atmospheric emissions arise from power generation and venting. The table below provides the Production related fuel combustion and venting as reported into the Environmental Emissions Monitoring System (EEMS) through the Department of Energy and Climate Change [DECC] UK Oil Portal.

Atmospheric Emission	Unit	48/29A Platform	48/29B Platform	48/29C Platform	52/5A Platform
CO ₂	Tonnes	53,434.4	322.9	365.5	751.5
NO _x	Tonnes	182.9	6.0	6.8	14.0
N ₂ O	Tonnes	4.4	0.1	0.1	0.1
SO ₂	Tonnes	0.1	0.4	0.5	0.9
CO	Tonnes	120.0	1.6	1.8	3.7
CH ₄	Tonnes	100.7	0.1	0.1	5.3
VOC	Tonnes	4.7	0.2	0.2	1.1

Water Discharges

Liquids associated with the gas produced by Hewett (produced water and condensate) is either processed through separation offshore and discharged to sea, re-injected into a disposal well, or routed to the export pipelines and transferred to the onshore terminal at Bacton where it is processed to the required standards prior to discharge. The 48/29A and the 52/5A installations hold permits for produced water discharge or injection under the Petroleum Operations (Oil Pollution Prevention and Control – OPPC) Regulations. During 2015:-

- A total of 6m³ water was discharged to sea from the 48/29A Platform as part of a re-commissioning of the produced water system. All other water/liquids produced from the 48/29A Platform were transferred to the export pipeline to Bacton.
- All the produced water from the 52/5A Platform was either re-injected (209 m3) or routed via the export pipeline to Bacton. There was no water discharged to sea.
- All produced water associated with production from the 48/29B & C platforms was routed via the export pipelines to Bacton.

Chemical Use and Discharge (Production)

Under the Offshore Chemical Regulations, the Hewett installations (52/5A, 48/29C and 48/29A which includes the 48/29B as a tied back installation) hold permits under the Offshore Chemicals Regulations (OCR) to use and discharge chemicals. The table below summaries total chemical use across all Hewett installations.

Chemical Category	Total (kg)
Chemicals used	4488
Chemicals discharged	3230
SUB chemicals used	Zero
SUB chemicals discharged	Zero

The chemicals used comprised water based hydraulic fluids, corrosion inhibitors, cleaning fluids, valve hydro-testing and foam chemicals for de-watering of wells utilised during routine production operations. The majority of these chemicals were Hazard Quotient (HQ) Category 'E' or 'D' chemicals (the ratio of Predicted Effect Concentration against No Effect Concentration).

HQ Category	Use (kg)	Discharge (kg)
E	500	0
Gold	8	0
D	3230	3230
Silver	750	0

Eni Hewett Limited, 2015 Environmental Statement

Chemicals are subject to continual review and Eni will continue to seek suitable alternatives, where appropriate.

Waste Management (Production)

Management and segregation of wastes takes place on the Hewett Satellite Platforms and the Central Complex prior to transfer to onshore facilities for recycling or disposal. Total Waste arising during 2015 from the offshore installations and the disposal routes are provided in the table below.

Category	Reuse (t)	Re- cycling (t)	Waste to Energy (t)	Inci- nerate (t)	Landfill (t)	Other (t)	Total (t)
Group 1 – Special							
Chemicals/ Paints	-	0.958	3.970	-	0.710	-	5.638
Drums/ Containers	-	0.454	-	-	-	-	0.454
Oils	-	-	3.180	-	-	-	3.180
Miscellaneous Special Waste	-	0.436	2.016	-	0.145	-	2.597
Sludge's / Liquids / Washings	-	-	1.000	-	-	-	1.000
Sub-Total	-	1.848	10.166	-	0.855	-	12.869
Group II – General							
Chemicals/ Paints	-	-	-	-	-	-	-
Drums/ Containers	-	0.030	-	-	-	-	0.030
Scrap metal	-	109.722	-	-	-	-	109.722
Segregated Recyclables	-	26.587	-	-	-	-	26.587
General Waste	-	2.591	-	-	26.775	-	29.366
Sludge's / Liquids / Washings	-	-	-	-	-	-	-
Sub-Total	-	138.930	-	-	26.775	-	165.705
Grand Total	-	140.778	10.166	-	27.630	-	178.574

From the above it can be seen that the Hewett Offshore Installations recycled 78.8% of the total waste produced. Waste disposed to Landfill amounted to 15.5% of the total waste produced.

Group III and Group IV Wastes

No Group III [Other Wastes] or Group IV [Back-loaded Cuttings] wastes were produced in 2015.

Compliance

During 2015 there were three reportable spills to sea, reported via the PON1 system maintained on the energy portal:-

- 48/29B – Approximately 0.02 tonnes of mineral hydraulic oil due to a leak from an isolation valve assembly;
- 48/29A - Approximately 0.01 tonnes of condensate from a process vent line with a corrosion defect;
- 48/29A – Approximately 0.002 tonnes condensate resulting from a leaking valve on a process vent drain-off line.

Non-Compliances

The following permit/regulatory Non Compliances occurred and reports were submitted during 2015:-

- 52/5A (OCR) - Incorrect recording and EEMS Reporting of a chemical use event from 2014;
- 52/5A (OPPC) – A short duration failure of the produced water re-injection flowmeter;
- 48/29A (OPPC) – Two exceedances of the Oil in Water limits during short duration discharges associated with re-commissioning. One with an average reading of 256 mg/l equating to a maximum of <0.0001 tonnes of oil (condensate) discharged and one of 338 mg/l equating to approximately 0.007 tonnes discharged.

2016 Key Activities

The main offshore aims and objectives for the Hewett Assets during 2016 are to:

- ✓ Undertake compliance audits and reviews of Permits and Consents and associated Environmental Management Systems Processes;
- ✓ Offshore Environmental Management Systems Audits and Inspections of all platforms;
- ✓ Review and update environmental data monitoring & reporting schedules;
- ✓ Review and update Environmental Key Performance Indicators [KPIs];
- ✓ Review and update of Environmental Aspects Registers and HSE Management System Interface documentation;
- ✓ Planning for transition to the requirements of the Offshore Safety Directive and associated Environmental Functions;
- ✓ Implement requirements of the OSPAR Recommendation 2012/5 on management of produced water.