



eni Hewett Limited

OSPAR Public Statement 2014 Environmental Performance

Hewett Field Area



Introduction

This is the 2014 OSPAR Public Statement for eni Hewett Ltd. The statement reports the environmental performance of eni Hewett operations and activities in the Hewett Field during 2014 in line with the requirements of OSPAR Recommendation 2003/5. The scope focuses on offshore assets that discharge directly to the environment, and do not produce through any third party operations.

Hewett Field Offshore Activities

During 2014 eni Hewett, License holder of the Hewett Field, continued production via subsea installations and the offshore platforms comprised of the Central Complex (49/28A-P&FTP) and satellite platforms (52/5A, 48/29B and 48/29C). Petrofac Offshore Engineering and Operations continued to operate the Hewett Field installations on behalf of eni Hewett, as the appointed Duty Holder.

The Hewett Field satellite installations are not continuously manned and are operated and maintained via periodic working offshore by Petrofac operations and maintenance teams. When unmanned, the installations are controlled from the Central Complex or onshore control room located at the Bacton Terminal.

One well stimulation intervention operation took place on the A-13 well (52/5A Platform) between 27th February and 15th March. No drilling activities took place during 2014.

eni Hewett HSE Policy

eni Hewett adopts the eni UK 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 the regulatory requirements.

The requirements of the Policy are implemented through management systems and operational management controls.

eni Hewett HSE Management System

eni Hewett adopts the eni UK Health, Safety and Environment Integrated Management System (HSE IMS) 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 Hewett and Petrofac to provide the mechanism for implementing eni requirements through Petrofac's HSE management system and to manage and control operational activities. Routine meetings are held between eni Hewett and Petrofac to review performance and progress to ensure requirements are being complied with, together with routine reporting of performance data and information.

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

Key Activities Achieved in 2014

eni Hewett's key activities and objectives outlined for 2014 were to ensure compliance with all environmental permits and relevant regulations and to progress a number of programmes to support continued improvement in performance. Key achievements in 2014 and other significant activities completed include:

- Review and update of HSE Risk/Aspect Registers; HSE MS Interface and Reporting Schedules;
- Successful completion of Duty Holder's 14001 surveillance audit and the eni Hewett OSPAR EMS Verification;
- Completion of all scheduled offshore EMS audits and inspections;
- Completion of Onshore Emergency Response exercises and Offshore Drills;
- KPIs Environmental consequences package rolled out for spills across all assets;
- Maintenance of the trained E-Reps in place for all assets;
- Offshore NORM surveys completed and appropriate waste management undertaken for all assets.

The Hewett 48/29A Central Complex



Oil or Chemical Spills

During 2014 there were five reportable oil or chemical spills reported via the PON1 system;

- 12th March (48/29C): 2 litres of hydraulic fluid were lost from the sub-sea well-head control panel;
- 28th July (48/29B): 1 litre of hydraulic oil was lost to sea from a valve actuator;
- 29th August (48/29C): 1,500 litres of Aqualink 300F Ver2 were accidentally released from the hydraulic power unit;
- 15th November 2014 (48/29A): approximately 2 litres of diesel were lost to sea from the fore-pump storage tank; and
- 31st December (48/29C): approximately 2,500 litres of hydraulic fluid were lost to sea from the sub-sea well control system.

Atmospheric Emissions (Production) - EEMS Based

Atmospheric Emissions	Unit	48/29A Platform	48/29B Platform	48/29C Platform	52/5A Platform
CO2	Tonnes	60,704.20	313.06	374.3	707.2
NOX	Tonnes	1,126.80	5.81	6.9	13.1
N2O	Tonnes	4.20	0.02	0.0	0.0
SO2	Tonnes	75.9	0.39	0.5	0.9
CO	Tonnes	297.8	1.54	1.8	3.5
CH4	Tonnes	3.4	0.02	0.0	0.0
VOC	Tonnes	37.9	0.20	0.2	0.4

eni Hewett participates in the European Union Emissions Trading Scheme (EU ETS) and reports against combustion source allowances associated with the eni Hewett 48/29A installation ETS Permit.

During 2014 a total of 159.01 tonnes of gas were vented from the Hewett Installations.

Produced Water

The 48/29A and the 52/5A installations generate produced water as a result of the gas recovery process. Both installations hold life permits for produced water discharge or injection under the Petroleum Operations (Oil Pollution Prevention and Control) Regulations, which set a maximum limit of 30mg/l for the concentration of oil in water discharged to sea.

During 2014 no water was discharged from the 48/29A Platform. All produced water was routed via the export pipelines to the onshore Terminal at Bacton. All the produced water from the 52/5A Platform was either re-injected to the A9 well (257 cubic metres) or routed via the export pipeline to the onshore Terminal at Bacton.

Chemical Use and Discharge (Production)

Under the Offshore Chemical Regulations, the Hewett installations (52/5A, 48/29C and 48/29A) have permits to use and discharge chemicals. The table below summaries total chemical use across all Hewett installations.

Chemical Category	Total (kg)
Chemicals used	5,777
Chemicals discharged	150
SUB chemicals used	377.0
SUB chemicals discharged	0.0

During 2014 a total of 5,777 kg of chemicals were used and 150 kg were discharged. 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	3350	0
Gold	72	0
D	1780	150
Silver	575	0

The chemicals used were hydraulic fluids, corrosion inhibitors, and cleaning fluids utilised during routine production operations and well intervention. Chemicals are subject to continual review and eni Hewett will continue to seek suitable alternatives, where appropriate.

Waste Management (Production)

Management and segregation of wastes takes place on the Hewett satellites and the central complex prior to transfer to onshore facilities for recycling or disposal. The table below summarises the waste quantities and management routes during 2014.

Total Waste

Disposal Route	Tonnes
Re-use	0.0
Recycling	108.937
Waste to Energy	11.310
Incineration	0.009
Landfill	22.515
Other	0.0
Total	142.771

Group I – Special Waste (Production)

Special waste production amounted to 13.657 tonnes in 2014 mainly comprising of chemicals, paints, and oils.

Category	Tonnes
Chemicals/ Paints	4.643
Drums/ Containers	0.313
Oils	5.020
Miscellaneous Special Waste	3.681
Sludges / Liquids / Washings	0.0
Total	13.657

Group II – General Waste (Production)

129.01 tonnes of general waste was produced in 2014 from the Hewett installations, mainly comprising of scrap metal, summarized in the following table.

Category	Tonnes
Chemicals/ Paints	0.0
Drums/ Containers	0.002
Scrap Metal	82.898
Segregated Recyclable	23.715
General Waste	22.395
Sludges/ Liquids/ Tank Washings	0.0
Total	129.01

Group III – Other Waste

The only 'Other' Group III type of waste produced was 0.104 tonnes of asbestos.

Group IV – Backloaded Cuttings

No 'Backloaded Cuttings' Group IV type waste was produced during 2014 activities.

Non-Compliances

An OCR Non Compliance occurred on 15th September, on the 48/29A Platform, when a chemical was used (no discharges) for purposes which had not been included within the installation's chemical permit. A review of awareness and management processes was undertaken to prevent re-occurrence.

2015 Key Activities

The main offshore aims and objectives for eni Hewett during 2015 are to:

- Complete the assessment and identification of environmentally critical elements - in line with regulator's guidelines;
- Review and update the eni Hewett environmental data monitoring & reporting schedule;
- Review environmental KPIs and track/evaluate performance across the year;
- Undertake compliance reviews of Permits and Consents requirements;
- Commence planning for compliance with the requirements of the Offshore Safety Directive and associated Environmental Functions;
- Review implications of (OSPAR) recommendation 2012/5 on management of produced water and develop arrangement to ensure compliance; and
- Ensure compliance with the requirements of the Energy Saving Opportunity Scheme (ESOS).