

# OSPAR Public Statement 2016



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## Abbreviations

CMAPP	Corporate Major Accident Prevention Policy
EEMS	Environmental and Emissions Monitoring System
EHS	Environmental, Health and Safety
EMS	Environmental Management System
ENI	ENI UK Limited
EOGUKL	EOG Resources United Kingdom Limited's
ePON1	Electronic Petroleum Operations Notice 1
NPAI	Not Permanently Attended Installation
OCNS	Offshore Chemical Notification Scheme
OIM	Offshore Installation Manager
OPEP	Oil Pollution Emergency Plan
OPRED	Offshore Petroleum Regulator for Environment & Decommissioning
OSDR	Offshore Safety Directive Regulations
OSPAR	Oslo and Paris Commission
PETS	Portal Environmental Tracking System
RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
SUB	Substitution
UKCS	United Kingdom Continental Shelf

## 1 Introduction

Under OSPAR Recommendation 2003/5 to Promote the Use and Implementation of Environmental Management Systems (EMS) by the Offshore Petroleum Regulator for Environment & Decommissioning (OPRED) requires all operators of offshore installations to produce a Public Statement to report their environmental performance. These Public Statements must be prepared on an annual basis (covering offshore installation activities carried out during the previous calendar year), made available to the public and copied to OPRED by 1<sup>st</sup> June of each year.

In accordance with this requirement, this document reports on the environmental performance of EOG Resources United Kingdom Limited's (hereafter referred to as EOGUKL) operated offshore activities in the United Kingdom Continental Shelf (UKCS) during 2016.

## 2 EOG Resources United Kingdom Limited

EOGUKL is the UK subsidiary of EOG Resources Inc., one of the largest independent (non-integrated) oil and natural gas companies in the United States, with substantial proven reserves in the United States, Canada, offshore Trinidad, the United Kingdom and China.

The UK operation is headquartered in Guildford. Further information on the company is available from: <http://www.eogresources.com>.

EOGUKL is the sole licence operator for Block 110/12a (Licence No. P.1476) in the East Irish Sea. EOGUKL holds 100 per cent equity of this licence block. Licence P.1476 is the only EOGUKL operated licence held during 2016.

Block 110/12a contains the Conwy oil field, which EOGUKL began to develop in 2010 with the installation of a single Not Permanently Attended Installation (NPAI) occurring in May 2012. The Conwy NPAI is tied back to the ENI UK Limited (ENI) operated Douglas Complex in Block 110/13 via a 12 kilometre, 8-inch diameter infield production pipeline, which was also installed in 2012.

EOGUKL is the Licence and Field Operator (and Installation, Well and Pipeline Operator) of the Conwy Development.

## 3 Environmental Management System

EOGUKL operates under an integrated Environmental, Health and Safety (EHS) Management System, which has been developed to be consistent with existing international and national models for health, safety and environmental management (e.g. ISO 14001, OHSAS 18001, HSG (65), BS 8800).

The management process is structured around the plan, do, assess and adjust process, with a feedback loop to assure continual improvement in performance, as illustrated in Figure 3.1. This system provides the mechanism to implement EOGUKL standards relevant throughout the business lifecycle from acquisition of new licences and acreage through to decommissioning and divestiture.

The key steps in this process can be described as follows:

### 1. Policies, Standards and Expectations

The system is driven by the Corporate Major Accident Prevention Policy (CMAPP) and the EHS Policy (copies of which have been provided in Appendices A and B), which sets out the Company's expectations and commitments to the prevention of major accident hazards and EHS performance. The policies provide a framework for establishing performance goals, from which targets are established.

### 2. Organise

Planning during the annual budget process defines work activities and resource needs for the upcoming year. EHS roles and responsibilities are clearly defined. Commitment to EHS is visibly demonstrated through defined internal and external communication networks. Personnel have the competence and training to meet their responsibilities.

**3. Plan**

All potential hazards and risks associated with planned activities are identified, assessed and control measures identified. Plans to respond to emergencies and unforeseen events are in place.

**4. Do**

Guidelines, bridging/interface documents and local operating procedures are established so that risks are properly managed and the Company’s expectations and standards are delivered. Competent contractors are selected and managed. Significant changes made to the organisation, plant / equipment, guidelines and procedures are also subject to this risk review as part of the change management process.

**5. Assess and Adjust**

Routine monitoring is undertaken to assess EHS performance. Procedures for reporting and investigating incidents and non-compliances are in place. Audits, inspections and reviews are undertaken to check the effective functioning and continued suitability of the management system. Performance against standards is reported and reviewed and areas for improvement identified. Lessons learned and results from the audit, inspection and review process are fed back into the system to enable continual improvement.

**Figure 3.1. The EHS Management Framework**



As required by OSPAR Recommendation 2003/5, EOGUKL’s EMS has been independently verified by Lloyds Register in September 2016. The EMS is scheduled to be re-verified in September 2018.

**4 Overview of 2016 Activities**

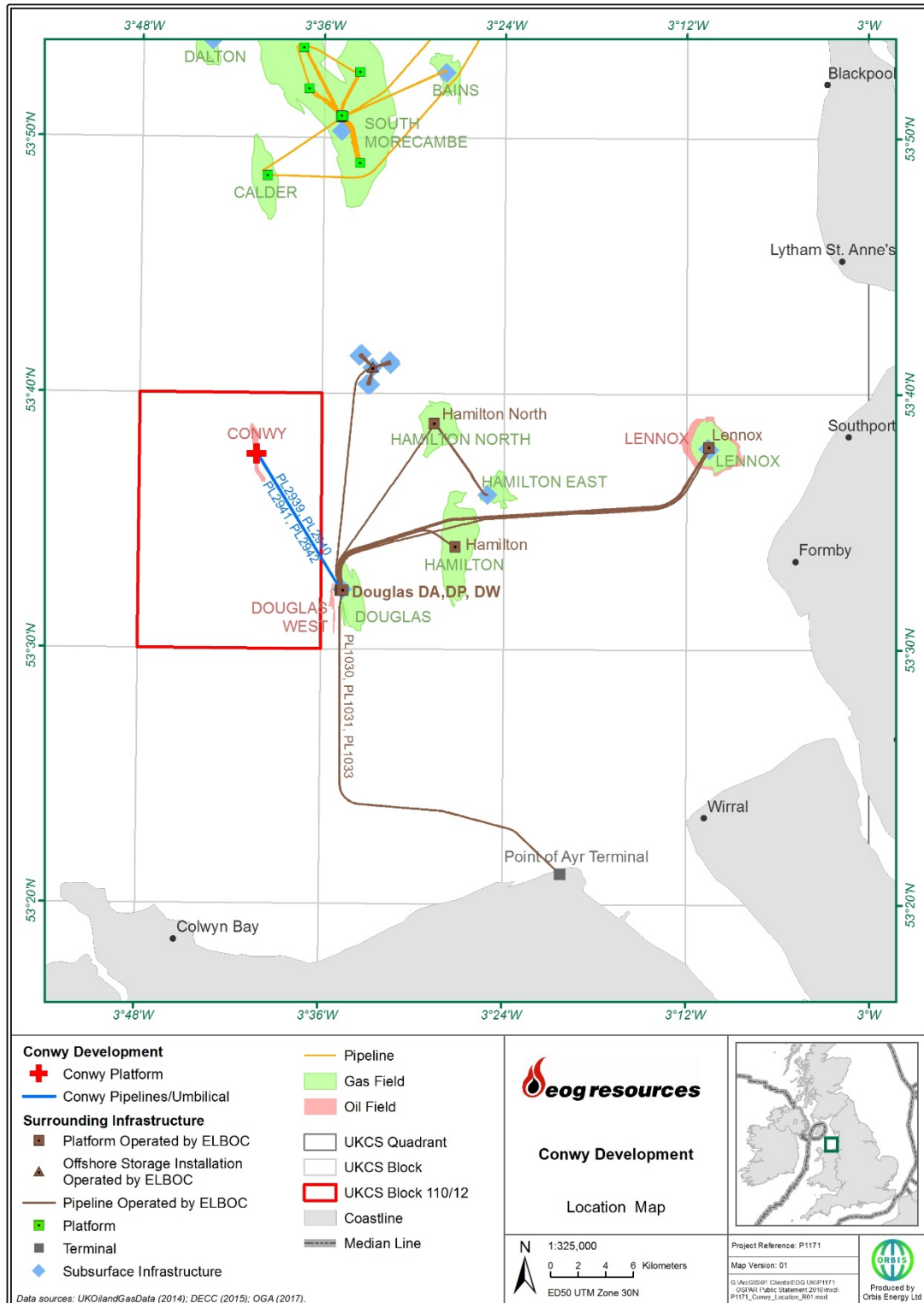
EOGUKL’s 2016 operated offshore activities comprised preparations for the start-up of production at the Conwy field in Block 110/12a, which was achieved in March 2016 (Figure 4.1). This included commissioning and production operations at the Conwy facilities and also EOGUKL construction and commissioning operations at the ENI operated Douglas Complex host facility to which Conwy produces. The activities undertaken were as follows:

- Dewatering and commissioning of the pipelines and umbilical;

- Commissioning, start-up and subsequent production operations involving the Conwy NPAI facilities; and
- Final construction, pre-commissioning and start-up of modifications to the Douglas Complex to handle Conwy field fluids.

Further details on activities associated with these operations and a summary of environmental performance pertaining to these activities is discussed in Section 5.

Figure 4.1. Location of the Conwy Development and Associated Infrastructure



## 5 Summary of 2016 Environmental Performance

The potential environmental impacts associated with EOGUKL’s 2016 offshore activities include those associated with preparatory work for the start-up of the production at the Conwy field including:

- Chemical use and discharges as regulated under The Offshore Chemical Regulations 2002 (as amended); and
- Waste generated on the Conwy NPAI and the Jack-Up Barge BV JB-115 jack-up accommodation unit.

The environmental performance data is therefore split into operations involving the Conwy infrastructure in Table 5.1 and Table 5.2, and operations involving the EOGUKL contracted JB-115 jack-up accommodation unit in Table 5.3.

Of note is that normal power requirements for the Conwy field are met via a power cable from the ENI operated Douglas Complex. Power generation requirements, and therefore associated atmospheric emissions, from the Conwy NPAI are considered negligible.

### 5.1 Conwy NPAI

**Table 5.1. Environmental Performance Data from the Conwy NPAI**

Environmental Indicator	Conwy NPAI					
Chemical Performance <sup>1</sup>	Use (kilogrammes)			Discharge (kilogrammes)		
Gold	100			100		
Waste Type	Reuse (tonnes)	Recycle (tonnes)	Waste to Energy (tonnes)	Incinerate (tonnes)	Landfill (tonnes)	Other (tonnes)
Special Waste (Group I)	-	-	-	-	-	-
General Waste (Group II)	-	0.006	-	-	0.2	1.49
Other (Group III)	-	-	-	-	-	-
Environmental Incidents						
Chemical Release	Number of Incidents				1	
Hydrocarbon Release	Number of Incidents				0	

<sup>1</sup> Only one chemical (cleaning detergent) was used under the Conwy NPAI chemical permit during 2016 since production chemicals are provided from the Douglas Complex under the Douglas Complex chemical permit.

### 5.2 Conwy Pipeline Infrastructure

Data reported in Table 5.2 outlines the environmental performance related to pipeline infrastructure. The pipeline infrastructure (comprising a production pipeline, water injection pipeline, condensate injection pipeline, associated risers and a control/power/chemicals umbilical) associated with the Conwy field development was installed in 2012.

During 2016 this subsea infrastructure was maintained and prepared for use in production operations. During this period the subsea infrastructure contained treated seawater (containing biocide chemicals) primarily to prevent internal corrosion of the subsea infrastructure pending final commissioning prior to start-up.

In 2015, DECC requested that the Conwy PON15C permit (PON15C/396) be closed with the remaining final commissioning activities moved over to a Pipeline Operations permit on the new Portal Environmental Tracking System (PETS). The Pipeline Operations permit (MAT Ref: PLA/244) remained



open throughout 2015 with an end date in 2016, coinciding with start-up of production, therefore chemical use and discharge quantities associated with final commissioning activities are reported here.

As the PON15C permit ended in 2015, all chemical use and discharge from the pipeline installation and commissioning activities covered by the PON15C were reported via the Environmental and Emissions Monitoring System (EEMS) in 2015 and therefore the OSPAR Public Statement for 2015. The EEMS chemical performance reported in Table 5.2 therefore refers to chemical use and discharge under the Pipeline Operations permit (MAT Ref: PLA/244) covering activities from July 2015 to March 2016.

**Table 5.2. Environmental Performance Data Related to Subsea Facilities**

Environmental Indicator	Conwy Production Pipeline / Flowline / Umbilical (PLA/244)	
Chemical Performance <sup>1</sup>	Use (kilogrammes)	Discharge (kilogrammes)
SUB	2,000	0
Gold	3,255	1520
E	88,000	53,447
Environmental Incidents		
Chemical Release	Number of Incidents	0
Hydrocarbon Release	Number of Incidents	0

<sup>1</sup> Chemical use and discharge has been grouped by Hazard Quotient Category / Offshore Chemical Notification Scheme (OCNS) Group. Those chemicals with substitution (SUB) warnings have been recorded separately and the amounts are not duplicated in the ranking categories.

### 5.3 JB-115 Jack-Up Accommodation Unit

The JB-115 jack-up accommodation unit was contracted by EOGUKL as part of modification work being undertaken on the Douglas Complex. As the JB-115 jack-up accommodation unit was contracted by EOGUKL, environmental reporting is undertaken by EOGUKL, despite the unit being located at the ENI operated Douglas Complex. A summary of the environmental performance from the JB-115 jack-up accommodation unit is provided in Table 5.3.

**Table 5.3. Environmental Performance Data from the JB-115 Jack-Up Accommodation Unit**

Environmental Indicator	JB-115 Jack-Up Accommodation Unit					
Waste Type <sup>1</sup>	Reuse (tonnes)	Recycle (tonnes)	Waste to Energy (tonnes)	Incinerate (tonnes)	Landfill (tonnes)	Other (tonnes)
Special Waste (Group I)	-	1.3	0.1	0.5	-	-
General Waste (Group II)	-	1.72	-	-	4.75	11.93
Other (Group III)	-	-	-	--	-	-
Environmental Incidents						
Chemical Release	Number of Incidents					0
Hydrocarbon Release	Number of Incidents					0

<sup>1</sup> Includes all waste generated on the JB-115 jack-up accommodation unit whilst under contract by EOGUKL at the ENI operated Douglas Complex during 2016.

### 5.4 Accidental Releases

Oil or chemical release incidents are reported to OPRED in accordance with the electronic Petroleum Operations Notice 1 (ePON1) system.

EOGUKL confirms that no oil release incidents occurred during their operated activities in 2016. However, there was one small chemical release incident at the Conwy NPAI. Table 5.4 provides brief details of EOGUKL's hydrocarbon and chemical incidents at sea during 2016.

**Table 5.4. Hydrocarbon and Chemical Incidents at Sea**

Location	Date	Description	Substance	
			Hydrocarbon (kilogrammes)	Chemical (kilogrammes)
Conwy NPAI	03/06/16	Wax inhibitor chemical leaked from joint on chemical supply line	-	3.81

## 6 Progress against 2016 EMS Objectives and Targets

Based on the operated activities in 2016, EOGUKL set a number of EMS targets and objectives. The progress these against these targets and objectives is reported in Table 6.1.

**Table 6.1. Performance and Progress against EOGUKL’s 2016 EMS Objectives and Targets**

Issue	Objective	Target	Progress / Status
Leadership and Communication	Improve internal leadership and communications	EHSMS Management Review – Suitability for Conwy production operations (see also under “Audits and Reviews” below)	Complete – areas for improvement identified and selected parts of EHS Management System will be revised during 2017
		Complete and issue CMAPP and update EHS Policy	CMAPP issued February 2016. EHS Policy updated and reissued June 2016
		6 Management site visits – senior managers to operational sites	38 Management visits to construction and production operations sites
		Review organisation and training and competency requirements	Continual review of production organisation and training programme implemented to ensure competency
Legislative and Regulatory Compliance	Permits and consents – Ensure full compliance	Maintain Conwy Development consents register	Continued update and review throughout project development phase and into production operations
		Maintain Conwy Production Consents Register	Included within EOGUKL Action Tracking Register
	Conwy Safety Case	Update Conwy Safety Case to comply with OSDR 2015 and have it accepted by HSE	Completed
	Conwy OPEP	Update Conwy OPEP to comply with OSDR 2015	Approved May 2016
Contractor Selection and Management	Management and monitoring of contractor performance	Monitor through Audit Plan	Audit of several key production contractors deferred to 2017 due to delayed Conwy field start-up

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Issue	Objective	Target	Progress / Status
Risk Assessment	Ensure risk assessments are completed for all major activities.	Complete operational risk assessments as required for completion of Douglas construction, commissioning and start-up activities	Risk assessments undertaken as required by EOGUKL and ENI
Monitoring and Incident Reporting	Monitor EHS performance	Maintain and report EHS statistics	Monthly EHS statistics maintained for construction, commissioning, start-up and production activities
	Incident reporting	Ensure all EHS related incidents and accidents are followed through to closure, with findings reported to workforce within 1 month	Incident and accidents investigated and followed through to closure, but not all within 1 month of occurrence
	Review	Quarterly EHS and operations performance review	Reviewed at monthly management meetings
Safety Performance	Incidents	No lost time incidents	None
		No reportable incidents under RIDDOR	None
Environmental Performance	Vented gas at the Conwy NPAI	0.316 tonnes of gas vented per annum (based on maximum of 6 venting episodes per annum, at 1000 standard cubic feet (28.3 cubic metres) per episode)	Well intervention and increased pipeline pigging frequency required additional venting episodes, increasing vented quantities
	Oil and chemical spills	No oil or chemical spills	None
	Offshore chemical use	Set baseline for chemical usage based on Q1 production and chemical use	Awaiting steady state production rates to assess baseline chemical usage. Plan to undertake in 2017
Emergency Response	Emergency plans in place and up to date	Update emergency response plan for Conwy production operations	Updated May and September 2016
	Emergency response training	Emergency response training for all personnel (workshops and exercises prior to major operational activity)	Complete – training up-to-date
		Exercises held 1 per quarter (3 desktop, 1 full)	Full SOSREP exercise May 2016 plus 3 desktop exercises held 1Q, 2Q and 4Q

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Issue	Objective	Target	Progress / Status
		Offshore Conwy drills – at least 1 per quarter (focus on major accident hazards, but to include 1 oil spill scenario)	4 drills completed including 2 oil spill scenarios
	Oil spill response training	Sufficient number of personnel trained to OPEP Level 1, 2 and 3	Complete – training up-to-date
Reviews and Audits	Ensure facilities and operations are appropriately reviewed and audited	2016 Audit Plan – develop and implement	Audit plan developed but programme not completed due to delayed Conwy field start-up
		Conwy post start-up compliance audit	Delayed Conwy field start-up caused compliance audit to be postponed to 2017
	System reviews for suitability	EHS MS Management Review – Suitability for Conwy Production Operations (see also under “Leadership and Communication” above)	Complete – areas for improvement identified and selected parts of EHS Management System will be revised during 2017

## 7 Proposed 2017 Objectives and Targets

In 2017, EOGUKL’s UKCS operated activities are focussed on the maintenance and operation of the Conwy facilities and the completion of residual construction works at the Douglas Complex. EOGUKL have identified a number of objectives and targets to aim for to improve environmental performance in offshore activities in 2017; these are presented in Table 7.1.

**Table 7.1. 2017 Objectives and Targets**

Issue	Objective	Target
Leadership and Communication	Improve internal leadership and communications	Annual EHS MS Management Review – suitability for Conwy Production Operations (see also under “Audits and Reviews” below)
		Review, update and reissue CMAPP and EHS Policy
		Roll-out updated EHS MS to workforce
		8 Management site visits – senior managers to operational sites
		Review organisation and training/competency requirements
Legislative and Regulatory Compliance	Permits and consents - ensure full compliance	Maintain Conwy Production Consents Register
	Conwy Safety Case	Annual review of Conwy Safety Case
	Conwy OPEP	Annual review of Conwy OPEP
Contractor Selection and Management	Management and monitoring of contractor performance	Monitor through Audit Plan
Risk Assessment	Ensure risk assessments are completed for all major activities.	Complete operational risk assessments as required for Conwy operations
Monitoring and Incident Reporting	Monitor EHS performance	Maintain and report EHS statistics
	Incident reporting	Ensure all EHS related incidents and accidents are followed through to closure, with findings reported to workforce within 1 month
	Review	Quarterly EHS and operations performance review
Safety Performance	Incidents	No lost time incidents
		No reportable incidents
Environmental Performance	Vented gas at Conwy platform	Reduction in vented quantities compared to 2016 (on unit of production basis)
	Oil and chemical spills	No oil or chemical spills

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<b>Issue</b>	<b>Objective</b>	<b>Target</b>
	Offshore chemical use	Set baseline for chemical usage
Emergency Response	Emergency plans in place and up to date	Review emergency response plan for anticipated Conwy production operations
	Emergency response training	Emergency response training for all personnel (workshops and exercises prior to major operational activity)
		Exercises held 1 per quarter (3 desktop, 1 full)
		Offshore Conwy drills – at least 1 per quarter (focus on major accident hazards, but to include 1 oil spill scenario)
	Oil spill response training	Sufficient number of personnel trained to OPEP Level 1, 2 and 3
Reviews and Audits	Ensure facilities and operations are appropriately reviewed and audited	2017 Audit Plan – develop and implement (to include audits deferred from 2016)
		Conwy post start-up compliance audit
	System reviews for suitability	EHS MS Management Review – Suitability for Conwy Production Operations (see also under “Leadership and Communication” above)

## Appendix A: Corporate Major Accident Prevention Policy

### EOG Resources United Kingdom Limited

#### Corporate Major Accident Prevention Policy (CMAPP)

This CMAPP sets out the overall aims and arrangements for controlling the risk of a major accident within EOG Resources United Kingdom Limited (EOGUKL) and outlines how those aims shall be achieved. This CMAPP applies to all operations undertaken by EOGUKL and shall be communicated by EOGUKL's Management Team to those persons involved in, or affected by, such operations.

EOGUKL shall:

- Continue to support the objectives set out in EOGUKL's Environmental, Health and Safety (EHS) Policy with the goals of no accidents, no harm to people and no damage to the environment.
- Ensure that major accident hazards with the potential to impact people, the environment and asset integrity are identified, assessed and managed for all activities under the control of both EOGUKL and EOGUKL's contractors.
- Promote and encourage a strong safety culture through:
  - Regular offshore visits by senior management,
  - Behavioural safety and team building workshops,
  - Feedback from senior management on safety performance and audit/inspection results,
  - Encouraging participation and suggestions from the workforce for improving safety performance, working conditions and other offshore activities,
  - Implementing an Open Door Policy to encourage reporting of concerns that the workforce feel are not being addressed,
  - Appointment of Safety Representatives and holding regular meetings to discuss issues, concerns, major accident hazards and potential changes to operations,
  - Recognition and rewarding commitments and actions intended to, and/or, deliver improved safety performance.
- Operate an effective system to ensure the competency of all personnel in key roles performing safety and environmental critical tasks.
- Have systems in place to effectively select and manage contractors, and confirm the competence of their personnel and suitability of their management systems.
- Identify safety and environmental critical elements (SECEs) for credible major accidents and:
  - Ensure SECEs are designed to survive any incident they are controlling/mitigating or fail to a state that achieves the desired aim,
  - Have performance standards with defined functionality, availability, reliability, survivability and interdependence (FARSI),
  - Through the establishment of major accident management key performance indicators (KPIs), ensure that SECEs are maintained and their performance monitored to ensure they continue to meet the defined performance standards.
- Manage major accident hazards (MAHs) through prevention which is controlled by:
  - Use of competent persons and a robust decision making process,
  - Asset integrity management, involving inspection, pro-active maintenance and repair,
  - Monitoring and maintenance of SECEs,
  - Regular review of performance standards,
  - Change management, involving the identification of impacts to MAHs, SECEs and performance standards, and the implementation of additional controls,
  - Auditing the management of MAHs,
  - Implementing a written verification scheme; reviewing assurance activities with Independent Verification Body (IVB).

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- Establish a Major Accident Management Board (MAMB) that meets at least six-monthly to:
  - Ensure the CMAPP is in place, current and promoted throughout EOGUKL,
  - Ensure all major accidents associated with EOGUKL's operations have been identified and are being suitably managed at all levels,
  - Review major accident KPIs, both leading and lagging, and whether the CMAPP is being implemented correctly,
  - Share industry good practice with respect to the prevention of major accidents and use this knowledge as part of EOGUKL's continuous improvement,
  - Ensure that the EHS management system and other company systems continue to reflect the CMAPP;
  - Act quickly and decisively to address any identified shortfalls or improvement opportunities.
- Hold tripartite discussions (between the competent authority, duty holders and workers' representatives) for any change relating to the management of MAHs; implement appropriate actions arising from these discussions.
- Implement processes to reliably collect and securely store data which can be used for historical analysis.
- Report all incidents (including near misses); investigate events and possible outcomes; establish the root and contributory causes and take action to avoid similar incidents in the future.
- Establish an annual audit programme to address:
  - Compliance with the EHS Policy and the CMAPP,
  - Compliance with regulatory requirements (including safety cases),
  - EHS policies, goals, procedures and organisational capabilities,
  - Management of asset integrity,
  - Management of major accident hazards.

The frequency of audits will be commensurate to the hazards and risks of EOGUKL's business activities. The audit programme shall underpin continuous improvement in the control of major accident hazards.
- Have systems, personnel and resources in place to enable command and control of major accidents utilising emergency management and response plans. All personnel directly involved in the management of major accidents shall be trained and assessed for their roles.
- Undertake senior management reviews and establish improvement action plans annually (or at other more frequent intervals if required by the MAMB, change management or review/audit finding) as defined within the company's EHS management system. These reviews include:
  - The EHS Policy,
  - The continued applicability, implementation and effectiveness of the company's EHS management system,
  - The company's EHS goals and objectives,
  - The availability and capability of resources (competent personnel, systems, procedures, hardware), necessary to ensure the effective management of major accident hazards,
  - Results of performance monitoring, incident investigations, comments from the workforce and results of internal and external audits.

The UK Country Manager has prime accountability for ensuring this CMAPP is suitable, implemented and operated as intended.

<b>Senior Management Commitment to this CMAPP</b>	
Adam Farrow, UK Country Manager	
Steve Holmes, Commercial & Regulatory Affairs Manager	
Gavin Morrice, Conwy Asset Integrity Manager	

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## Appendix B: EHS Policy



### EOG Resources United Kingdom Limited Environmental, Health and Safety Policy

EOG Resources United Kingdom Limited (EOGUKL) conducts its business with a commitment to safeguard the environment and human health. Good environmental, health and safety performance is critical to the success of our business and is the responsibility of every person working for and on behalf of EOGUKL.

In furtherance of this policy, EOGUKL:

- Considers environmental, health and safety performance, including the management and control of major accident hazards, to be an integral part of business planning, development, operations and decision-making.
- Conducts its business and applies management systems in a manner designed to comply with all applicable environmental, health and safety laws, regulations and other requirements, applying responsible standards where such laws or regulations do not exist.
- Provides leadership, professional personnel, training, support and other resources necessary for the implementation of environmental, health and safety programmes that are designed to ensure each individual is aware of, and competent to, undertake their responsibilities.
- Continues to drive down the impact of its business on the environment by reducing wastes, emissions and discharges, preventing pollution and using energy efficiently.
- Communicates openly and honestly with its customers, employees, contractors, partners, appropriate regulatory authorities, the community and public interest groups regarding significant environmental, health or safety matters.
- Works with the regulatory authorities, industry groups and others to develop sound, equitable and realistic laws and regulations to protect the environment, personnel and the general public and to raise the standards of our industry.
- Strives to continuously improve and enhance our environmental, health and safety performance, through appropriate means and programmes, toward its goal:
  - **no accidents**
  - **no harm to people**
  - **no damage to the environment.**



Adam Farrow  
Country Manager

May 2017

*This policy is in addition to the requirements of the EOG Resources, Inc. Conduct of Business Affairs policy relating to environmental, health, and safety matters and the EOG Resources, Inc. Environmental, Health and Safety Policy.*

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