



OSPAR Public Statement - 2019

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ABBREVIATIONS

ALARP	As Low As Reasonably Practicable
BEIS	Department of Business, Energy and Industrial Strategy
CMAPP	Corporate Major Accident Prevention policy
EEMS	Environmental Emissions Monitoring System
EMS	Environmental Management System
HSE	The Health and Safety Executive
ISO	International Organization for Standardization
NUI	Normally Unattended Installation
OGA	Oil & Gas Authority
OSPAR	Oslo and Paris Commission
SEMS	Safety and Environmental Management System
SH&E	Safety, Health and Environmental
UKCS	United Kingdom Continental Shelf
WES	Well Examination Scheme
WIMS	Well Integrity Management System

1 INTRODUCTION

Under OSPAR Recommendation 2003/5 to Promote the Use and Implementation of Environmental Management Systems (EMS) by the Offshore Industry, the Department for Business, Energy and Industrial Strategy (BEIS) requires all operators of offshore installations, including Well Operators, to produce a Public Statement to report their environmental performance. These 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 BEIS by 1st June of each year.

2 EXECUTIVE SUMMARY

In accordance with this requirement, this document reports on the environmental performance of Alpha Petroleum Resources Limited's (hereafter referred to as Alpha Petroleum) UK Continental Shelf (UKCS) operated offshore activities during 2019. It is focused on environmental issues associated with operations which were directly under Alpha Petroleum control. It does not include discharges and emissions at host facilities or from facilities which are operated under environmental consents held by the Installation Operator; these discharges and emissions are included within the relevant company's public statement.

3 ALPHA PETROLEUM RESOURCES LIMITED

Alpha Petroleum is a privately owned UK company, headquartered in Guildford and focussed on the UK offshore basins. Further information on the company is available from: www.alphapetroleum.com.

Alpha Petroleum is Licensee, Field Operator and Well Operator for a number of small southern North Sea (SNS) gas basin developments (Figure 2.1). To date, these include one single well subsea completion (Helvellyn) and three small Normally Unattended Installations (NUIs – Kilmar, Garrow and Wenlock), all of which are tied back to platforms operated by Perenco UK Ltd (Perenco).

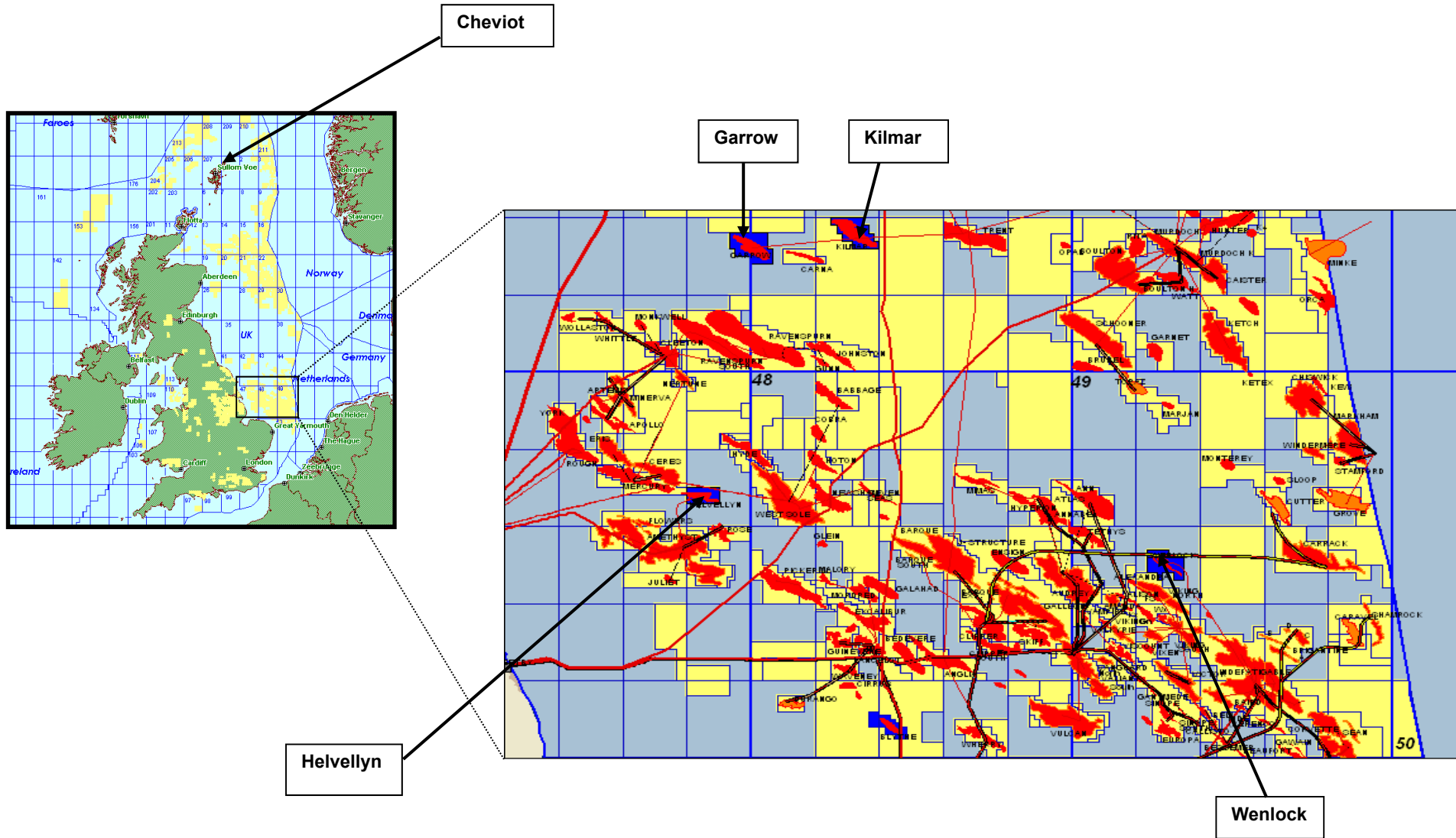
During 2019, Alpha Petroleum was also Licensee of the Blocks that contain the Cheviot Field Development area (including the Cheviot and Peel reservoirs) in the northern North Sea.

Table 2.1 shows the Alpha Petroleum licences that were held in the UKCS during 2019.

Table 2.1: The Alpha Petroleum Licences held in the UKCS during 2019

Block	Interest	Licence	Field	UKCS Region
47/10a	100%	P001	Helvellyn	Southern North Sea
43/22a	17%	P683	Kilmar	Southern North Sea
42/25a, 43/21a	17%	P1034	Garrow	Southern North Sea
49/12aN, 49/12b	20%	P033	Wenlock	Southern North Sea
2/10b, 2/15a, 3/6a, 3/11b	100%	P1070	Cheviot	Northern North Sea

Figure 2.1: Location of Alpha Petroleum Assets (2019)



4 THE ENVIRONMENTAL MANAGEMENT SYSTEM

Alpha Petroleum operates under an integrated Safety and Environmental Management System (SEMS) to enable the goals and aims of the Company's Safety, Health and Environmental (SH&E) Policy (Figure 3.1) to be achieved. It reflects the principles embodied in existing international and national models for safety and environmental management (e.g. ISO14001, OHSAS 18001, HSG (65)). Alpha Petroleum Senior Management is committed to incorporating the goals of the SH&E Policy into all Company activities: no accidents, no harm to people and no damage to the environment.

The scope of SEMS is the management of safety and environmental aspects related to Alpha Petroleum's position as Licensee, Field Operator and Well Operator in the oil and gas industry.

When applied to Company operations and projects and within its defined context, SEMS is designed to identify, control and manage S&E risks arising from business activities. These operations and hence the scope of SEMS covers:

1. Offshore operations associated with oil and gas appraisal, field development and production within the UK Continental Shelf (UKCS) for which Alpha Petroleum has S&E responsibilities; and,
2. Onshore business activities including planning and design phases for field development and production operations undertaken within offices for which Alpha Petroleum has S&E responsibilities, including the Guildford (head) office.

The SEMS provides a flexible management framework through which the Company can systematically identify and manage its safety and environmental risks and opportunities, accommodating individual operational complexities, changing legal and business requirements and the Company's commitment to continual improvement.

The key components of the SEMS are summarised in Table 3.1 and key documents include:


1. The SH&E Policy;
2. The Corporate Major Accident Prevention policy (CMAPP);
3. The SEMS Framework document, which outlines SEMS elements and associated systems and documents;
4. SEMS Guidance documents, which describe how SEMS elements are applied;
5. Emergency Response Plans, which detail the Company's response to and management of incidents;
6. Oil Pollution Emergency Plans, which detail the Company response to pollution incidents; and,
7. SEMS Implementation and Supporting Documents, which comprise documents such as annual plans, studies, evaluations and audits.

As required by OSPAR Recommendation 2003/5, Alpha Petroleum's EMS is independently verified; certification to ISO14001:2015 was completed in June 2018 and is subject to ongoing surveillance audits.

Perenco is the Installation Operator and Pipeline Operator for all Alpha Petroleum operating assets; as such, operations on these assets are undertaken under the Perenco SEMS. Perenco's SEMS has been reviewed by Alpha Petroleum and Perenco has been approved by OGA, BEIS and the HSE as a competent Operator. Alpha Petroleum is Well Operator for the wells in the SNS licences and the wells are included in the Alpha Petroleum Well Examination Scheme (WES) and will in 2020 be managed by Alpha Petroleum's Well Integrity Management System (WIMS). During production, Perenco manages 'day-to-day' well operations, wellhead

maintenance and annulus monitoring under contractual arrangements with Alpha Petroleum. These operations are therefore undertaken under the Perenco SEMS and any variance is communicated to Alpha Petroleum if it is to occur outside the pre-agreed working envelope.

Figure 3.1: Alpha Petroleum SH&E Policy



SAFETY, HEALTH AND ENVIRONMENTAL POLICY

Alpha Petroleum Resources Limited will conduct its business with a commitment to the safety and health of people and to the protection of the environment and inline with its role as Licensee, Field Operator and Well Operator.

Our Goals are – No Accidents, No Harm to People and No Damage to the Environment.

To accomplish this we will:

- Communicate the importance of effective safety, health and environmental management as an integral part of our business which is recognised and endorsed at the highest levels.
- Design and manage all our activities to ensure that HSE risks are identified and managed so that they are as low as reasonably practicable.
- Comply as a minimum with laws, regulations and obligations governing safety and environmental protection and the standards set by industry organisations to which we subscribe.
- Ensure that all personnel and Contractors who work for us and on our behalf are aware of the Company's HSE goals and expectations and hold them accountable for their performance.
- Provide leadership, professional personnel and training to support this Policy.
- Monitor, evaluate and report safety and environmental performance and conduct internal audits.
- Participate in programmes and discussions with established Industry forums designed to improve technology, laws and regulations.
- Seek continual improvement in safety and environmental performance through management review and by setting appropriate objectives and targets consistent with the aims of this Policy.








Graham Walters
Chief Operating Officer
Alpha Petroleum Resources Limited

28th May 2020

Date

This Policy is available to interested parties on www.alphapetroleum.com

Table 3.1: SEMS Framework

SEMS Process	Main Process Activities	SEMS Elements and Key S&E Documents
	<ul style="list-style-type: none"> Develop and Review SH&E Policy and CMAPP 	<ul style="list-style-type: none"> – Safety, Health and Environmental Policy – Corporate Major Accident Prevention Policy
	<ul style="list-style-type: none"> • Establish SEMS accountabilities & responsibilities • Manage Personnel S&E competence and training • Manage contractor S&E performance • Manage S&E documents and data • Ensure effective communication 	<ul style="list-style-type: none"> – GU1: Personnel Safety and Environmental Competence – GU2: Assuring Contractor Safety and Environmental Performance – Document Control and Data Management
	<ul style="list-style-type: none"> • Identify legal and other S&E requirements • Establish S&E objectives and targets • Prepare Safety, Environmental and Emergency Plans 	<ul style="list-style-type: none"> – GU3: Safety and Environmental Regulatory Compliance – GU4: Safety and Environmental Plans – Emergency Response Plans – Oil Pollution Emergency Plans – Well Examination Scheme – Disaster Recovery Plan
	<ul style="list-style-type: none"> • Manage S&E risks • Manage S&E impacts of changes • Take corrective, preventative and improvement action 	<ul style="list-style-type: none"> – GU5: Risk Management – GU6: Management of Change – GU7: Incident Notification and Investigation
	<ul style="list-style-type: none"> • Monitor performance • Conduct audits • Review SEMS 	<ul style="list-style-type: none"> – GU8: Safety and Environmental Performance Assurance

5 2019 ENVIRONMENTAL PERFORMANCE

5.1 OVERVIEW OF 2019 ACTIVITIES

Alpha Petroleum produced a Safety and Environmental Plan detailing the extent of its intended activity for 2019. This plan was reviewed and updated on a quarterly basis. There were no well operations during 2019, no production from the Helvellyn field and no offshore activities in the Cheviot Field.

Alpha Petroleum offshore operations undertaken during 2019 comprised:

Tors

- Ongoing gas production operations (through Trent: operated by Perenco)

Wenlock

- Ongoing gas production operations (through Inde 49/23A-AC: operated by Perenco)

All operations on the existing installations were undertaken under the Perenco SEMS.

5.2 2019 ENVIRONMENTAL ASPECTS REGISTER

Key environmental risks are identified, assessed and documented in an annual Environmental Aspects Register.

Planned activities and potential unplanned events (e.g. accidental releases) associated with the proposed operations were risk assessed against six environmental elements based on the main types of potential environmental impact for oil and gas activities. These are:

1. Physical Presence;
2. Seabed Disturbance;
3. Noise and Visual Impacts.
4. Atmospheric Emissions;
5. Marine Discharges;
6. Solid Wastes;
7. Resource Usage.

A total of 53 environmental aspects were identified and assessed for 2019. All aspects were assessed as Not Significant (negligible and low environmental risk). No Significant or Highly Significant environmental risks were identified. However, aspects with low residual risk were considered when identifying annual objectives and targets.

All regulated aspects were appropriately monitored. In addition, risk reduction and mitigation measures were put in place to control and mitigate environmental risks and maintain a high standard of environmental management. These included:

- Continued compliance, monitoring and reporting in accordance with all environmental permits, consents and other regulatory requirements;
- Continued liaison with environmental regulators and stakeholders;
- Assessment of and coordination with the designated Operator (Perenco);
- Continued inspection and maintenance of all offshore facilities by the designated Operator (Perenco);
- Installation specific emergency response plans in place (Perenco);
- Oil Pollution Emergency Plans in place (Perenco);

- Well Integrity Management Systems in place (Perenco);
- Well Examination Scheme in place (Alpha Petroleum);
- All diesel and chemical bunkering operations to NUIs undertaken in daylight and in good weather conditions (i.e. when manned);
- Annual monitoring of chemical use to optimise use; and,
- Ship Oil Pollution Emergency Plans in place (all support vessels).

With these controls in place all aspects, including legislatively controlled aspects, were appropriately monitored and managed.

Contractor Management has the potential to impact on the environment through unplanned or poorly planned releases to the environment. This is managed through the Company SEMS, specifically *SEMS Guidance GU2: Assuring Contractor S&E Performance*.

5.3 2019 ENVIRONMENTAL OBJECTIVES

Given that Alpha Petroleum's operations are largely consent driven, good environmental compliance and performance is largely a factor of ensuring that the Company, its appointed Operator Perenco, and appointed contractors obtain and maintain all appropriate environmental permits and consents. A series of environmental objectives were set and included in the annual Safety and Environmental Plan. These were set within the context of:

- Past performance;
- Assessment of risks associated with planned activities, as summarised in the Environmental Aspects Register;
- Compliance with existing and future legislation, permits and consents;
- Meeting the commitments made in the Alpha Petroleum SH&E and CMAPP Policies.

For 2019 the following environmental objectives were set:

- Continue the review, communication and internal audit of the SEMS to ensure a suitable and sufficient system is in place to manage Company operations in accordance with Company policies and statutory regulations;
- Complete certification of the Alpha Petroleum EMS to meet ISO 14001:2015 requirements;
- Ensure wells policies and procedures and the Alpha Petroleum Well Examination Scheme are reviewed and, as necessary, updated in preparation for well operations;
- Ensure appropriate communications are held with regulators and environmental stake holders for the field development planning for the Cheviot field;
- Ensure appropriate environmental submissions are prepared in support of field development planning for the Cheviot field;
- Ensure appropriate assurance of SEMS is undertaken for all contractors to be engaged by Alpha Petroleum;
- Undertake appropriate S&E monitoring and management of contractors during the Cheviot design phase;
- Ensure full legislative and regulatory compliance;
- Review and, where practicable, reduce the use of production chemicals;
- Started planning for Cop and decommissioning of Wenlock;
- Schedule and ensure appropriate personnel undertake relevant S&E training;
- Ensure environmental risk assessments are completed for any major activities;
- Ensure any environmental incidents are investigated and followed through to closure.

All environmental objectives were met although many objectives continue through into the 2019 S&E Plan.

5.4 2019 ENVIRONMENTAL PERFORMANCE

All environmental reporting for the Kilmar, Garrow and Wenlock installations in 2019 was undertaken by Perenco HSE Department

There were no well operations associated with the Alpha Petroleum wells during 2019 and therefore no environmental reporting requirements.

There were no environmental incidents associated with the Alpha Petroleum assets during 2019.

6 2020 ENVIRONMENTAL OBJECTIVES

Environmental objectives have been set by Alpha Petroleum for 2020 and include:

- Ensure full legislative and regulatory compliance;
- Continue the review, communication and internal audit of Alpha Petroleum's SEMS to ensure a suitable and robust system is in place to manage Company operations in accordance with Company policies and statutory regulations;
- Review of our QHSE and CMAPP Policies;
- Development and Implementation of Alpha Petroleum's Well Integrity Management System (WIMS);
- Ensure a thorough identification of Company environmental risks and opportunities and the needs and obligations associated with stakeholders;
- Undertake an independent surveillance audit of the Alpha Petroleum EMS to meet ISO 14001:2015 requirements;
- Ensure a suitable Well Examination Scheme is in place for well operations;
- Conduct an Environmental pre decommissioning survey at Wenlock;
- Consultation with JNCC and OPRED;
- Ensure appropriate communications are held with regulators and environmental stakeholders for the Cheviot field development and any well operations on the SNS wells;
- Ensure all necessary submissions are made to regulators to support the environmental consenting process for any well operations on the SNS wells and for the Cheviot field development;
- Undertake S&E monitoring and management of contractors is undertaken;
- Schedule and ensure identified personnel undertake appropriate SHE training;
- Ensure environmental risk assessments are completed for all major activities;
- Ensure any environmental incidents are investigated and followed through to closure.