



01	01.06.2020	Annual Statement	<i>Amy Jackson</i> A Jackson	<i>Jim Magee</i> J. Magee	<i>M. Brattbakk</i> M. Brattbakk
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DNO North Sea (ROGB) Limited  
Environmental Management System  
2019 OSPAR Public Statement

Document number

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**ABBREVIATIONS**

ARV	Audit, Review and Verification
BEIS	Department for Business, Energy and Industrial Strategy
BMS	Business Management System
CMS	Caister Murdoch System
HSE	Health, Safety and Environment
HIPO	High Potential incident
LTI	Lost Time Incident
MTC	Medical Treatment Case
NUI	Normally Unmanned Installation
OGA	Oil and Gas Authority
OCR	Offshore Chemicals Regulations
OPRED	Offshore Petroleum Regulator for Environment and Decommissioning
OSPAR	Oslo Paris Convention
P&A	Plugging and Abandonment
RWDC	Restricted Workday Case
TGT	Theddlethorpe Gas Terminal
UKCS	United Kingdom Continental Shelf



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## 1 Introduction

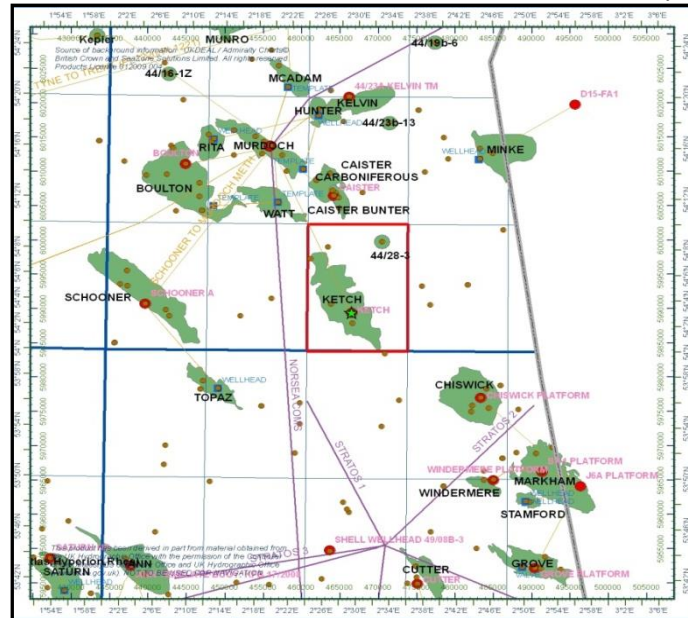
Under the OSPAR Recommendation 2003/5, the Department for Business, Energy and Industrial Strategy (BEIS) require that all existing United Kingdom Continental Shelf (UKCS) oil and gas operators undertaking offshore operations prepare an annual statement of their environmental performance, covering the calendar year, and make that statement available to the public. This document represents DNO North Sea (ROGB) Limited's (i.e. DNO's) annual public environmental statement for 2019 in relation to UKCS OSPAR reporting. DNO's Environmental Management System has undergone OSPAR re-verification in 2019.

## 2 DNO's UKCS Operations

DNO is an independent oil and gas group focused on exploration, appraisal and production in Norway, the Atlantic Margin and the UKCS. In January 2019, DNO successfully acquired Faroe Petroleum (ROGB) Limited (Faroe). During 2019, Faroe (and DNO from June 2019 onwards) operated the two producing assets (Schooner and Ketch), located within the UK Southern North Sea gas basin. The Schooner and Ketch fields are located within Block 44/26a, and Blocks 44/28b respectively, approximately 150 kilometres from the Theddlethorpe Gas Terminal (TGT) on the Lincolnshire coast (Figure 2.1). Schooner and Ketch Fields ceased production in August 2018 in line with TGT's cessation of operations and were subsequently granted formal Cessation of Production (COP) in November of the same year.

DNO are licence holder for the Schooner and Ketch installations and Petrofac have been appointed as Installation Operator since October 2014. The environmental performance of these assets will be reported in the Petrofac Public Statement for 2019. DNO is the Well Operator for Schooner and Ketch, as well as Pipeline Operator.

**Figure 2.1.** Location of the Schooner and Ketch Field Developments



Both the Schooner and Ketch field platforms (Figure 2.2) are four-legged, twelve-slot Normally Unmanned Installations (NUI). The platform wells were remotely controlled from the Murdoch Field platform, through which the gas was exported, where separation and compression occurred before the gas was transported via the ConocoPhillips-operated Caister Murdoch System (CMS) Infrastructure to the TGT for processing.

**Figure 2.2.** Schooner and Ketch NUIs



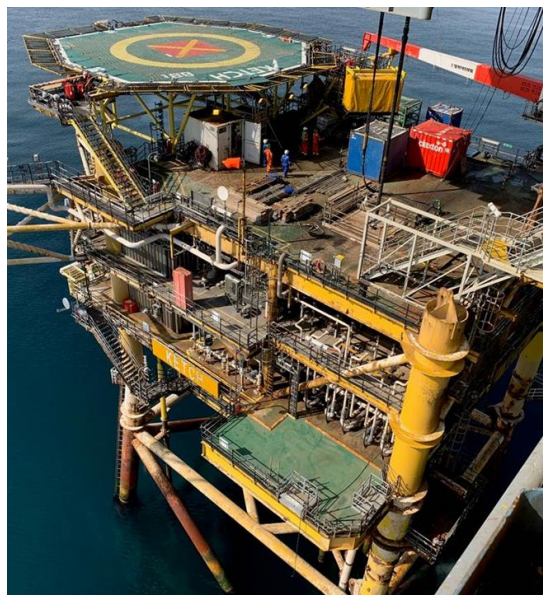
In association with COP, Faroe (i.e. DNO from June 2019) have subsequently submitted Decommissioning Programmes (and the supporting Environmental Appraisal and Comparative Assessment reports) for Schooner and Ketch and have received final approval from OPRED and BEIS in July 2019. The pipelines from Schooner NUI (16" wet gas export pipeline (PL1222) and 3" piggy-back methanol pipeline (PL1223)) and the Ketch NUI (18" wet gas export pipeline (PL1612) and 3" piggy-back methanol pipeline (PL1613)) to the Murdoch Field have been successfully cleaned, flushed, flooded with seawater and remain in situ until they are disconnected at a later stage. It is also noted that the 15.2 km 6" gas export pipeline from Topaz (operated by Ineos) to Schooner has also been cleaned, flushed and flooded with seawater.

The Schooner and Ketch Decommissioning Project is currently underway, with Plugging and Abandonment (P&A) operations commencing on Ketch in November 2019. The scope of the project :

- P&A of 20 platform wells (9 at Ketch and 11 at Schooner) and one sub-sea well at North West Schooner;
- Removal of topsides and jackets from both Schooner and Ketch platforms; and
- Burial of the Schooner pipeline and partial removal and burial of Ketch pipeline.

All items removed shall be safely transported to suitable, permitted and licensed onshore facilities for recycling and disposal. Upon completion of the removal scope, any debris shall be removed, and surveys conducted to monitor any infrastructure that has been left in-situ.

**Figure 2.3** P&A Operations on-board Ketch





### 3 Environmental Management System

The Business Management System (BMS) in operation within DNO has been designed to incorporate the elements of an Environmental Management System (EMS) which aims to:


- achieve full compliance with the OSPAR Recommendation 2003/5 to promote the use and implementation of Environmental Management Systems by the offshore industry;
- achieve the general objectives of the OSPAR offshore strategy;
- achieve the environmental goals of the prevention and elimination of pollution from offshore sources and of the protection and conservation of the maritime area against other adverse effects of offshore activities; and
- maintain continual improvement in environmental performance.

The EMS elements:

- have been implemented at a strategic level and integrated into corporate plans and policies;
- identify the organisation's impacts on the environment and set clear objectives and targets to improve its management of these aspects and the organisation's overall environmental performance;
- ensure preventative actions are incorporated to avoid negative impact to the environment;
- are designed to deliver and manage compliance with environmental laws and regulations on an ongoing basis, and to quickly initiate corrective action where potential cases of legal non-compliance are identified;
- identify DNO's significant resource use and aim to deliver good resource management; and
- incorporate assured requirements and performance metrics that demonstrate the above and can be communicated in a transparent manner.



**Figure 3.1** DNO's Health, Safety, Security and Environmental (HSSE) Policy, dated February 2020



## Health, Safety, Security and Environmental (HSSE) Policy Statement

**DNO is committed to managing the integrity of its operations and business activities responsibly. Consideration of the health, safety and security of our personnel, our other stakeholders, and the environment is central to how we conduct our business.**

We strive to create a rewarding working environment for our employees, contractors, and the communities in which we operate. We are committed to the HSSE goals of:

- Avoiding harm to all personnel involved in, or affected by, our operations.
- Preventing pollution and minimizing the impact of our operations on the environment.
- Complying with the applicable legal and regulatory requirements where we operate as well as relevant industry standards.
- Achieving continuous improvement in our HSSE performance.

This Policy Statement shall be implemented through the Company's business management system, "the DNO WAY", to ensure:

- A work environment characterized by respect, trust, cooperation, and a shared understanding of DNO's values where concerns can be freely raised.
- HSSE is integral to the roles and responsibilities of everybody who works for and with DNO.
- HSSE risks are identified, understood, assessed and controlled.
- Delivery of continuous improvement by setting clear HSSE goals at a business and individual level; achieving these goals through rigorous planning and execution of work and a trained and competent workforce; then learning from our successes and failures.
- Engagement with our suppliers and contractors to align them with our values and goals.

Our commitment to health and wellbeing:

- Prevention of work-related illness.
- Active health promotion to reduce health risks associated with the work environment.
- Allowing freedom of association and expression.
- Maintain a diverse workforce free from discrimination.

Our commitment to safety:

- Provision of a safe place to work, free from injury and accidents.
- Maintenance of asset integrity through design and engineering, and through sound maintenance, inspection, operations, and management of change procedures.
- Ensure an open reporting culture for incidents and near misses from which we learn to avoid recurrent incidents.


Our commitment to the environment:

- Minimize undesirable effects on the environment resulting from our activities.
- Promote the reduction of emissions and pollution from our operations.
- Contribute to the sustainable development of the regions where we operate.

Our commitment to security:

- Provide a secure work environment for all personnel involved in our activities.
- Abide by the Voluntary Principles on Security and Human Rights.

**The responsibility for compliance with this policy** lies with everybody who works for and with DNO. It is the role of the Managing Director of DNO ASA to ensure compliance with this Policy and the DNO Way through line management combined with regular reviews and audits.

  
**Bjørn Dale**  
**Managing Director DNO ASA**

February 2020





## 4 2019 Environmental Reporting – Well and Pipeline Operator

### 4.1 2019 UKCS Offshore Operations

DNO aims to minimise its environmental impact from any operational activities undertaken annually. Offshore operations, including well and pipeline cleaning-flushing campaigns, that were conducted by DNO as Wells and Pipelines operator in the UKCS in 2019, are outlined in Table 4.1

### 4.2 2019 Summary of Operations and Reportable Environmental Incidents

Table 4.1 provides a summary of the Schooner and Ketch wells and pipelines operations undertaken during 2019. Following successful flush-clean campaigns on the Schooner and Ketch pipelines, Ketch P&A operations commenced during November 2019. From mid-November to year end, well KA05 was not fully abandoned, but suspended (OGA mechanical status: Abandoned to Phase 2), and operations on KA06 had commenced.

Please note that reportable emissions relating to the Schooner and Ketch NUIs for 2019 are presented in the Petrofac Public Statement for 2019 as installation operator (Duty Holder).

**Table 4.1** DNO's 2019 UKCS Operations – Well and Pipeline Operator

Environmental Indicator	Unit	Schooner Platform	Ketch Platform
<b>Drilling and Well Activities</b>			
Wells drilled	No. of wells	0	0
Well intervention operations (includes P&A)	No. of operations	0	Total 3: 1 well had pressure bleed-off and lubrication (pre P&A), 1 well suspended (AB2) and second well P&A commenced**
<b>Pipeline Activities</b>			
Pipeline operations	No. of operations	1: 16" wet gas export pipeline (PL1222) & 3" methanol pipeline (PL1223) to Murdoch were cleaned, flushed, flooded with seawater and isolated/air gapped.	1: 18" wet gas export pipeline (PL1612) & 3" methanol pipeline (PL1613) to Murdoch were cleaned, flushed, flooded with seawater and isolated/air gapped.



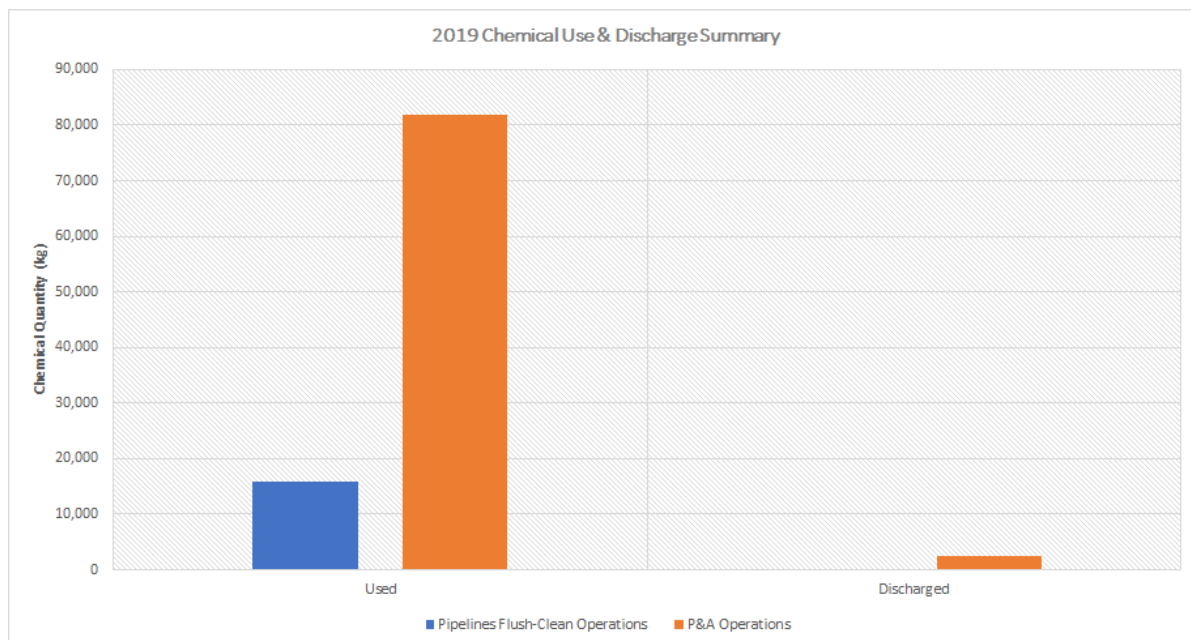
Environmental Indicator	Unit	Schooner Platform	Ketch Platform
<b>Environmental Incidents</b>			
Chemical release	No. of incidents	0	0
Hydrocarbon releases		0	0
Chemical Non-compliance		0	0

*\*\*It was anticipated all 9 Ketch wells would be P&A'd by April 2020. However, as a result of the COVID-19 global pandemic, DNO agreed with authorities to suspend operations until 2021.*

### 4.3 2019 Summary of Chemical Use and Discharge

During 2019, a total of 97,852 kg of chemicals were used throughout all operations; 81,915 kg were attributable to P&A operations and 15,937 kg attributable to the pipeline cleaning-flushing campaigns. A total of 2,430 kg of chemicals were discharged to sea, all of which were attributable to P&A operations (Figure 4.1). All chemicals used and discharged during all operations were in accordance with the Offshore Chemical Regulations (OCR) and were fully permitted.

**Figure 4.1.** 2019 Chemical Use & Discharge Summary

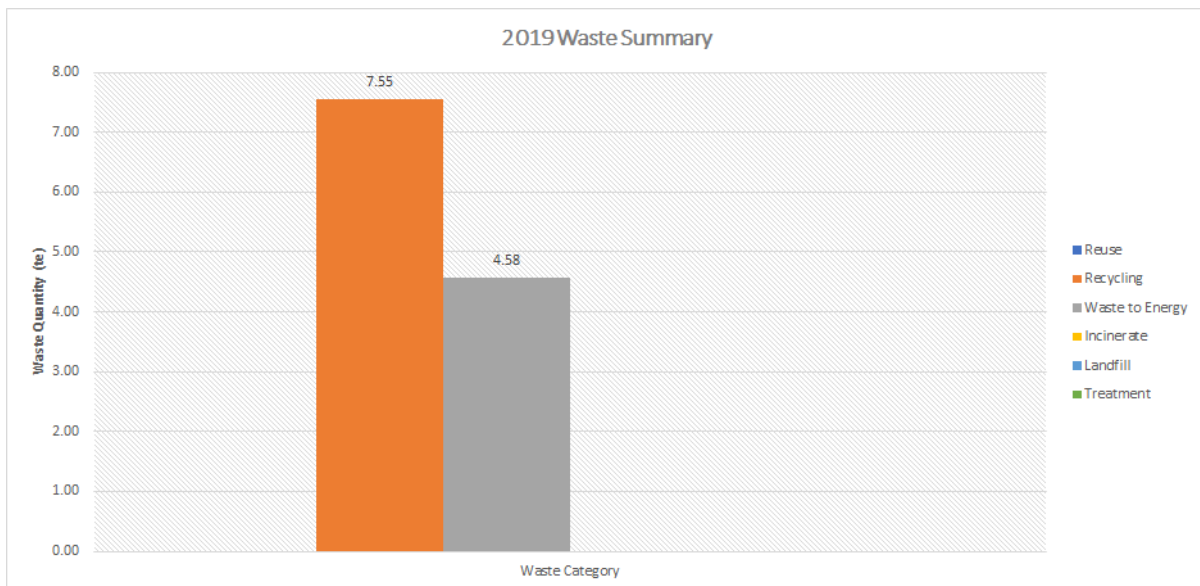




#### 4.4 2019 Waste Summary

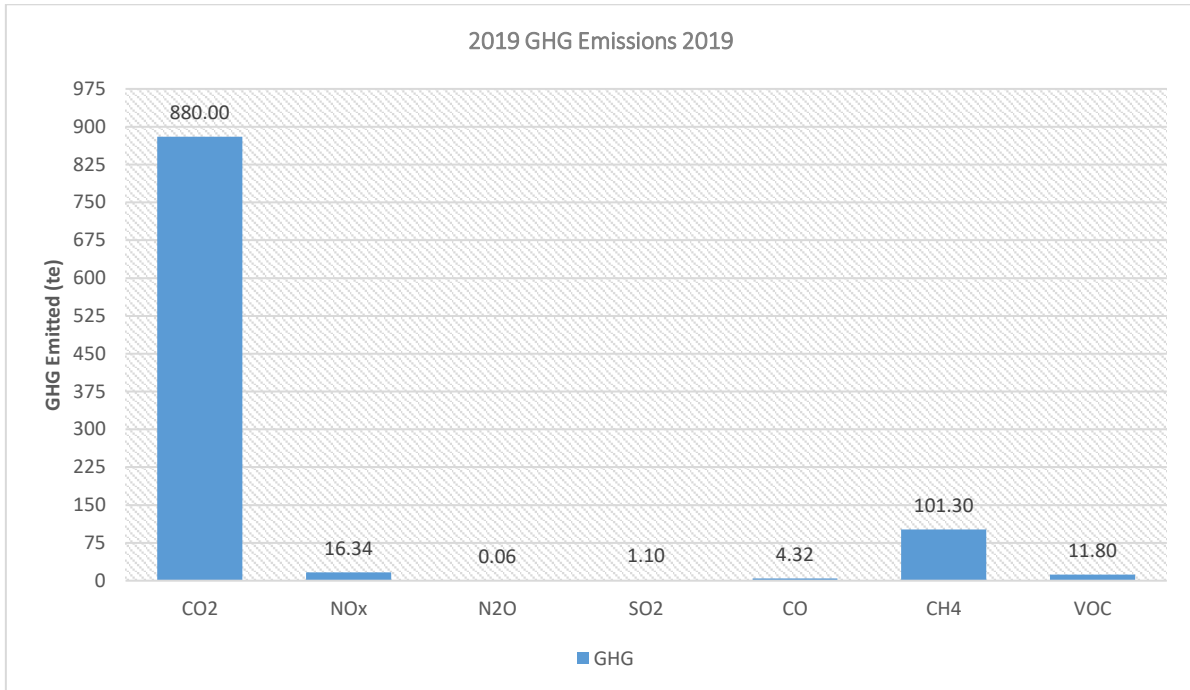
Throughout the 2019 P&A operations, a total of 12.13 tonnes of waste was generated, of which 7.55 tonnes (62 %) was recycled and 4.58 tonnes (38 %) waste to energy (Figure 4.2.). No waste went to landfill.

Figure 4.2 2019 Waste Summary



#### 4.5 2019 Atmospheric Summary

Diesel usage during the P&A operations totalled 275 tonnes, equating to approximately 880 tonnes of CO<sub>2</sub> emitted, as illustrated in Figure 4.3.

**Figure 4.3. 2019 GHG Summary**

It is noted that approximately 113 tonnes of natural gas was vented unignited to the atmosphere during P&A operations; this estimate is included within the CH<sub>4</sub> and VOC emissions illustrated in Figure 4.3.

#### 4.6 Oil or Chemical Spills

As spills to sea can have a negative impact on the marine environment, DNO work to minimise this risk, with a focus on prevention. DNO ensure regulatory approved oil emergency pollution plans are put in place for all relevant operations. During 2019 there were no reportable hydrocarbon spills or permit related non-compliances associated with well or pipeline operations.

## 5 2019 Objectives and Targets

DNO have set corporate HSE objectives and targets for the business to meet during 2019. These objectives and targets are presented in Table 5.1, as well as objectives specific to the Schooner and Ketch decommissioning project (Table 5.2).

**Table 5.1:** DNO's North Sea Business Unit Overriding HSE Objectives and Actions for 2019

Objective	Actions	Environmental Aspect
Zero high potential HSE incidents	<ul style="list-style-type: none"> <li>Establish follow-up KPIs</li> <li>Promote HSE-culture in all activities</li> </ul>	All
Emphasise safe operations through "see to" activities	<ul style="list-style-type: none"> <li>Participate in operators Major Accident Reviews</li> <li>Ensure Management Reviews take place</li> <li>Ensure updated risk picture</li> <li>Execute ARV</li> </ul>	All

**Table 5.2:** Schooner and Ketch Decommissioning Project HSE KPIs for 2019

Defined KPI	Status
90% compliance with 2019 ARV for Schooner and Ketch Decommissioning project	84% achieved
90% compliance with 2019 Schooner and Ketch decommissioning project PLANC	Achieved
Emergency response exercises and drills (including those with major contractors) are completed as planned	Achieved
90% on-time close-out of non-conformances arising from audits and incident investigations	88% achieved
No fatalities, LTIs, MTCs, RWDCs	Achieved
No reportable spills	Achieved
No reportable HIPOs	Achieved
No regulatory non-compliance	Achieved