



# TAILWIND ENERGY LTD OSPAR PUBLIC STATEMENT 2019



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## Abbreviations

CHARM	Chemical Hazard Assessment and Risk Management)
CMAPP	Corporate Major Accident Prevention Policy
BMS	Business Management System
CCI	Conwy Condensate Injection
EEMS	Environmental and Emissions Monitoring System
EHS	Environmental, Health and Safety
EHSMS	Environmental, Health and Safety Management System
EMS	Environmental Management System
ENI	ENI UK Limited
EOGUKL	EOG Resources United Kingdom Limited
E&P	Exploration & Production
ePON1	Electronic Petroleum Operations Notice 1
HMCS	Harmonised Mandatory Control Scheme
HOCNF	Harmonised Offshore Chemical Notification Format
HQ	Hazard Quotients
IRPA	Individual Risk Per Annum
KPI	Key Performance Indicator
NPAI	Not Permanently Attended Installation
OHSAS	Occupational Health and Safety Assessment Series
OPEP	Oil Pollution Emergency Plan
OPRED	Offshore Petroleum Regulator for Environment & Decommissioning
OSPAR	Oslo and Paris Commission
RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
ROGI	Reporting of Oil and Gas Incidents
t	Tonnes
QRA	Quantified Risk Assessment
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 are prepared on an annual basis (covering offshore installation activities carried out during the previous calendar year) and made available to the public.

In accordance with the above requirement, this report presents Tailwind Energy Ltd and its affiliates (Tailwind) environmental performance for 2019 for its operated asset in the East Irish Sea.

## 2 Tailwind Assets

Tailwind is an oil and gas company founded in 2016 focused on UK Continental Shelf and is licence holder for the following assets:

### Triton

The Triton Area consists of seven producing oil fields developed via common infrastructure in the UK Central North Sea, located approximately 190km east of Aberdeen. The seven fields currently producing oil and gas via the Triton FPSO, are Bittern, Guillemot West, Guillemot Northwest, Gannet E, Clapham, Pict and Saxon. Dana Petroleum (E&P) Limited ("Dana") and Waldorf Production UK Limited ("Waldorf") are our partners in the Triton cluster. Dana currently operate the Triton FPSO along with the Clapham, Saxon, Pict and Guillemot West fields. Following the Tailwind transaction to acquire its interests in Triton, Dana now also operate the Bittern field.

Tailwind is Licence Holder of the Gannet E Field, with Dana as pipeline operator and Petrofac as well operator. Tailwind also is 100% Licence Holder of the Belinda/Evelyn discoveries with Petrofac as well operator.

The fluids produced from the Triton field transported via a subsea pipeline to the Triton FPSO for onward processing and export. All environment reporting, including chemical usage/discharge, oil discharge with produced water, emissions to air and waste generation is reported by Dana.

This document only reports on our operated asset Conwy NPAI (Not Permanently Attended Installation).

### Conwy

Tailwind is the sole licence operator for Block 110/12a (Licence No. P.1476) in the East Irish Sea, which contains the Conwy oil field developed by with the installation of a single Not Permanently Attended Installation (NPAI) installed in May 2012.

The Conwy Platform is tied back to the ENI UK Limited (ENI) operated Douglas Complex in Block 110/13 via a 12 kilometer 8-inch diameter infield pipeline.

Tailwind is the Licensee and Operator of the Conwy facilities and wells.

### **3 Environmental Management System**

Tailwind operates an integrated Environmental, Health and Safety (EHS) Management System, which has been developed to be consistent with the ISO 14001 model for health, safety and environmental management.

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 Tailwind's standards throughout the business lifecycle.

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 (see Appendices A and B), which sets out Tailwind'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 forthcoming 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.

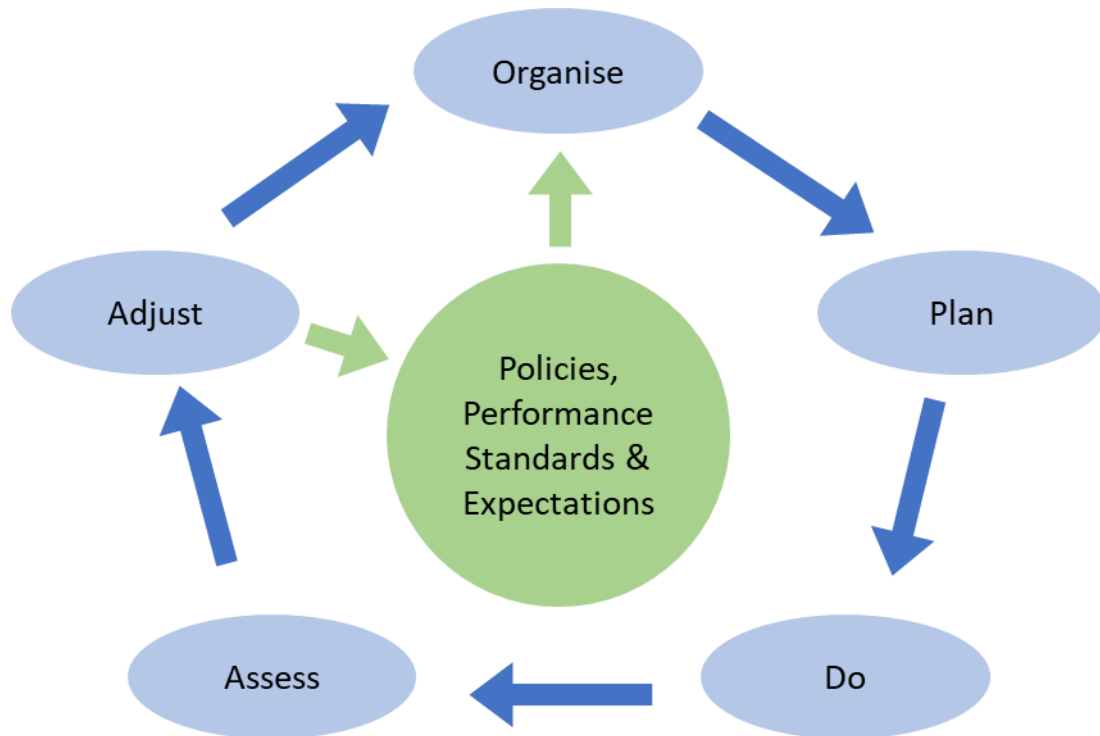
#### **4. Do**

Guidelines, bridging and interface documents as well as and local operating procedures are in place so that risks are properly managed and Tailwind's expectations and standards are delivered. Competent contractors are selected and managed. Significant changes made to the organisation, plant / equipment, guidelines or 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, the Tailwind EMS has been independently verified by Lloyds Register in October 2018. The EMS review is undertaken every 2 years the next re-verification is scheduled for September 2020.

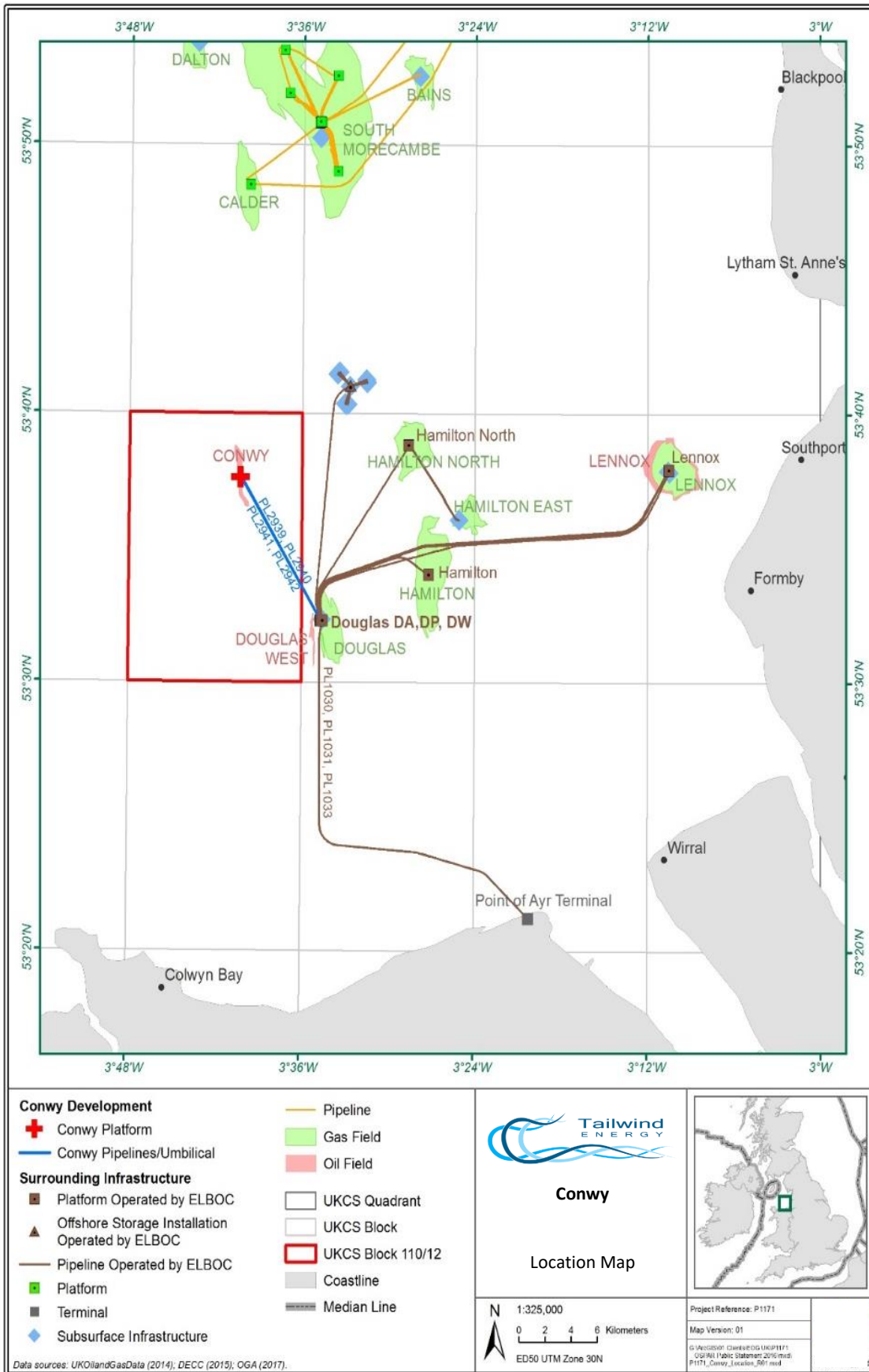
**4 Overview of 2019 Activities**

Tailwind’s 2019 operated offshore activities comprises of production operations at the Conwy field in Block 110/12a in the East Irish Sea.

Conwy reservoir fluids are produced from three wells at the Conwy NPAI and transported via a subsea pipeline to the Douglas Facilities for onward processing and export. Douglas provides Conwy with power via an umbilical and water via a subsea pipeline for reinjection back into Conwy for pressure maintenance and to maximise oil recovery.

A summary of the environmental performance pertaining to these activities is detailed in Section 5.

Figure 4.1. Location of the Conwy Development and Associated Infrastructure



## 5 Summary of 2019 Environmental Performance

The potential environmental impacts associated with Tailwind's 2019 offshore activities including those associated with production operations at the Conwy field are as follows:

- Chemical use and discharges as regulated under The Offshore Chemical Regulations 2002 (as amended); and
- Waste generated on the Conwy NPAI.

The Conwy asset produced a total of 27.06 tonnes of waste material of Category I and Category II; No Category III waste was produced (see Table 5.1. below). The chemical usage (Table 5.2) shows that most of the chemicals used at Conwy are handled, and in some cases, discharged at the Douglas Facilities.

The Conwy infrastructure refers to both the NPAI and pipeline infrastructure (comprising a production pipeline, water injection pipeline, associated risers and a control / power / chemicals umbilical).

Power supply to the Conwy NPAI is via a power cable from the Douglas facilities. Atmospheric emissions from the Conwy NPAI are negligible.

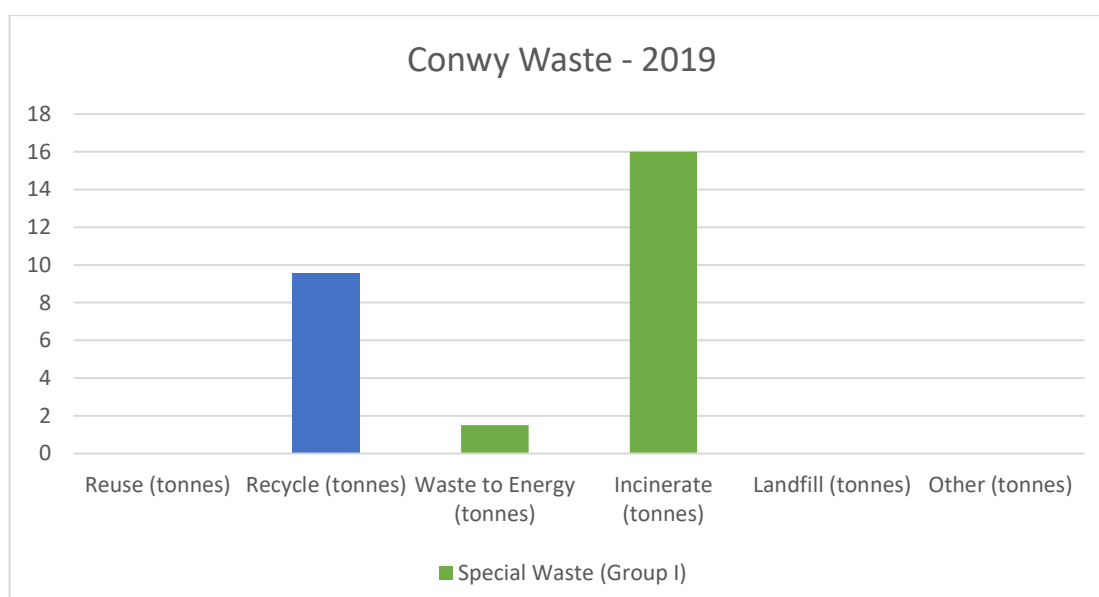
### 5.1 Conwy Infrastructure

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

Category	Reuse (t)	Recycling (t)	Waste to Energy (t)	Incinerate (t)	Landfill (t)	Other (t)	Total (t)
<b>Group I - Special</b>							
Chemicals / Paints	0	0	0	0	0	0	0
Drums / Containers	0	0	0	0	0	0	0
Oils	0	0	1.5	0	0	0	1.5
Miscellaneous Special Waste	0	0	0	16	0	0	16
Sludges / Liquids / Tank Washings	0	0	0	0	0	0	0
<b>Sub Total</b>	<b>0</b>	<b>0</b>	<b>1.5</b>	<b>16</b>	<b>0</b>	<b>0</b>	<b>17.5</b>
<b>Group II - General</b>							
Chemicals / Paints	0	0	0	0	0	0	0
Drums / Containers	0	0	0	0	0	0	0
Scrap Metal	0	0	0	0	0	0	0
Segregated Recyclables	0	9.56	0	0	0	0	9.56
General Waste	0	0	0	0	0	0	0
Sludges / Liquids / Tank Washings	0	0	0	0	0	0	0
<b>Sub Total</b>	<b>0</b>	<b>9.56</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>9.56</b>
<b>Group III - Other</b>							
Asbestos	0	0	0	0	0	0	0
Radioactive materials (exc. NORM)	0	0	0	0	0	0	0
Clinical	0	0	0	0	0	0	0
Explosives	0	0	0	0	0	0	0
<b>Sub Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Total</b>	<b>0</b>	<b>9.56</b>	<b>1.5</b>	<b>16</b>	<b>0</b>	<b>0</b>	<b>27.06</b>



**Figure 5.1 Conwy Waste (tonnes)**



**Table 5.2. Chemical usage**


Environmental Indicator	Conwy NPAI	
	Use (kg)	Discharge (kg)
Blue	0	0
Gold	5	0
E <sup>1</sup>	0	0

1. Substance is readily biodegradable and is non-bio accumulative.

The environmental indicators above (Blue, Gold and E) refer to the Hazard assessment of offshore chemicals based on the OSPAR Harmonised Mandatory Control Scheme (HMCS). Chemicals are ranked according to their calculated Hazard Quotients (HQ) (see Table 5.3) by the CHARM (Chemical Hazard Assessment and Risk Management) mathematical model, which uses toxicity, biodegradation and bioaccumulation data provided by suppliers on the HOCNF form.

Table 5.3 HQ Colour Banding

Minimum HQ value	Maximum HQ value	Colour banding
>0	<1	Gold
≥1	<30	Silver
≥30	<100	White
≥100	<300	Blue
≥300	<1000	Orange
≥1000		Purple

Lowest hazard  
  
 Highest hazard

## 5.2 Accidental Releases

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

Tailwind confirms that no oil or chemical release incident occurred at the Conwy NPAI during its period of ownership since November 2018.

## 6 Non-Compliance

In the month of June 2019 there was one non-compliance notification reported to BEIS as Petroleum Operations Notice 10 (PON10). This related to fog signals (a faulty fog detector) non-compliance with Conwy Consent to Locate conditions. The fog detector was removed, replaced with a new detector which is fully functional.

## 7 Progress against 2019 EMS Objectives and Targets

The progress against the EMS targets and objectives in place for Tailwind’s activities is reported in Table 7.1.

**Table 7.1. Performance and Progress against Tailwind’s 2019 EMS Objectives and Targets**

Issue	Objective	Target	Progress / Status
Legislative and Regulatory Compliance	Conwy Safety Case	Update Conwy Safety Case to reflect thorough review report and anticipated 2019 Conwy production scenarios.	Safety Case updated and issued January 2019.
	Conwy OPEP	Review and update (if required) Conwy OPEP to reflect spill risks.	OPEP updated with latest oil release prediction scenarios issued and approved by OPRED.
		Update OPEP when ER room is relocated to London Office and Operations Control Unit (OCU).	Emergency response room (OCU) approved by OPRED.
Risk Assessment	Ensure risk assessments are completed for all major activities.	CCI Project IRPA assessment.	QRA updated for CCI permanent work, i.e. incremental risk exposure to offshore crew. IRPA with in Tailwind risk criteria
Emergency Response	Emergency response exercise	Complete SOSREP exercise.	SOSREP exercise completed on 16th May 2019.

## 8 Proposed 2020 Objectives and Targets

Tailwind have identified a number of HSE objectives and targets in its annual HSE plan, which aim to improve environmental performance during offshore activities in 2020; these are summarised in Table 8.1.

**Table 8.1. 2020 Objectives and Targets**

Issue	Objective	Targets
Legislative and Regulatory Compliance	OSPAR	OSPAR Annual Public Statement
	Conwy Safety Case	Review and Update Conwy Safety Case
	Conwy OPEP	Review Conwy OPEP
	OSPAR EMS Audit	Independent review of TWM Environmental Management Systems against OSPAR recommendation 2003/5 by Lloyds Register.
Emergency Response	Emergency plans	Offshore Conwy drills – at least 1 per quarter (focus on major accident hazards, but to include 1 oil spill scenario per OIM per annum)
	Oils spill exercise	Onshore (Buckingham Gate office) - 1 full oil spill exercise
		Offshore (Conwy) - 1 full oil spill exercise

## Appendix A: Corporate Major Accident Prevention Policy

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

*Tailwind shall:*

- *Continue to support the objectives set out in Tailwind'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 Tailwind and Tailwind'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).*
  - *Establish a Major Accident Management Board (MAMB) that meets at least six-monthly to:*
    - *Ensure the CMAPP is in place, current and promoted throughout Tailwind,*
    - *Ensure all major accidents associated with Tailwind'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 Tailwind'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 HSSE 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 Tailwind'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 HSSE 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 Chief Operating Officer has prime accountability for ensuring this CMAPP is suitable, implemented and operated as intended.*

**Signed by CEO, COO and HSE Manager**

## Appendix B: EHS Policy

### Environmental, Health and Safety Policy

*Tailwind Energy Ltd 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 Tailwind Energy Ltd.*

*In furtherance of this policy, Tailwind Energy Ltd will:*

- *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.**

**Signed by CEO**