


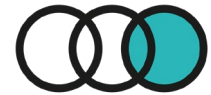




## FWM ENVIRONMENTAL REPORT 2019

WEL-GEN-007-001

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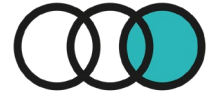
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## **1. INTRODUCTION**

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 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 BEIS by 1st June of each year.

In accordance with this requirement, this document reports on the environmental performance of Fraser Well Management Limited's (hereafter referred to as FWM) UK Continental Shelf (UKCS) operated offshore activities during 2019.

This report focusses on environmental issues associated with operations which were directly under FWM control as Well Operator. Therefore, it does not include discharges and emissions at host facilities or from facilities which are operated under environmental consents held by the Installation Operator or Duty Holder; these discharges and emissions are included within the associated Company's public statement.

This report is a statement designed to:

- Describe the scope of FWMs offshore activities;
- Provide a description of the FWM Environmental Management System (EMS);
- State the company's environmental policy, goals, objectives and targets; and
- Provide a performance summary for 2019.



## **2. FRASER WELL MANAGEMENT**

Fraser Well Management was established in 2004 and has a proven foundation in well engineering and project management, working across the globe and has capabilities in well design, construction, operations, intervention and decommissioning activities.

Over the its 16 year track record the company has drilled fifty-eight wells on a full well management basis covering the full well lifecycle; from exploration and appraisal wells to development wells and decommissioning. In addition to the management of well projects, FWM provides a diverse service offering to the oil & gas industry, including design and cost verification, relief well planning and engineering studies.

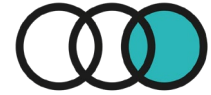
Operations span the complete well life cycle including:

- Drilling, Wells & Integrity Engineering Studies
- Well Design & Construction
- Full Well Lifecycle Operatorship & Intervention Management
- Well Decommissioning
- End-to-End Well Life-cycle Management

FWM operate from Aberdeen, Great Yarmouth and Rotterdam offices. The head office of FWM the Great Yarmouth Office and is located at:

Fraser Well Management  
Beacon Innovation Centre  
Beacon Park  
Gorleston  
Norfolk  
NR31 7RA

Further information can be found at <https://fraserwellmanagement.com/>.



### **3. FWM ENVIRONMENTAL MANAGEMENT SYSTEM**

This section provides a short overview of the FWM Environmental Management System as it operated in 2019.

#### **3.1. Introduction**

Fraser Well Management is committed to achieving high standards of health, safety and environmental performance and will ensure that all reasonable and necessary resources are made available to achieve these goals. FWM recognises that the nature of its activities may give rise to major accident hazards for clients, employees, contractors, infrastructure and the environment. FWM therefore have obligations to all stakeholders to reduce the risks associated with such hazards to levels as low as is reasonably practicable (ALARP).

In order to meet our obligations, the company has developed an Integrated Management System (IMS) which includes the Safety and Environmental Management System (SEMS).

#### **3.2. SEMS**

Fraser Well Management operates under an integrated SEMS to enable the goals and aims of the Company's Environmental Policy (Figure 1) to be achieved.

The scope of the SEMS is the management of safety and environmental aspects related to FWM's responsibilities as Well Operator in the oil and gas industry.

The key components of the FWM SEMS are as follows:

- Health & Safety Policy, Environmental Policy and CMAPP
- Business Support Procedures
- Operational Procedures
- HS&E Procedures
- Operational Guidelines documents
- Supporting Forms and templates.

All Work Programmes, Work Instructions, Reports, Registers and Records are generated in accordance with the governing procedures.

#### **3.3. Environmental Policy**

FWM's Senior Management is committed to implementing the FWM Environmental Policy into all Company activities. FWM's Commitment for environmental management is expressed in the Environmental policy statement. This is disseminated throughout the FWM organisation to all FWM personnel and to contractors. At each revision, the policy is reviewed and discussed with all employees and feedback obtained. FWM believe this creates buy-in from staff and understanding of the policy, while showing top level management commitment to environmental performance.



**ENVIRONMENTAL POLICY**

Date: 12/05/2020

HSEQ-POL-002

Rev: 1



Fraser Well Management's vision is to be recognised as an environmentally responsible well operator by our employees, stakeholders, clients, and our regulator.

To achieve this vision, we are committed to:

- maintaining an environmental management system which meets the requirements of ISO 14001
- conserving and protecting the environments in which we work
- meeting all obligations arising from environmental legislation, regulations, and standards relevant to our business
- being fully prepared to respond effectively to operational emergencies which might endanger the environment

To deliver on these commitments we will:

- assess the impact our activities may have on the environment and put protective measures in place
- measure and control the impact our activity has on the environment
- design and select equipment optimised for well conditions to minimise the risk of unplanned emissions
- communicate environmental risks and mitigations to our project teams and contractors to promote understanding and engagement
- promote strong environmental leadership and accountability at our work sites
- set environmental objectives, track our **performance** and identify areas for improvement
- provide all equipment, trained and competent staff and any other resources required to enable these objectives to be met
- ensure that all personnel are made aware of their individual obligations in respect of this Environmental Policy
- conduct regular reviews of our Environmental Policy to ensure it remains appropriate and suitable to our business
- maintain an audit schedule to monitor compliance with our environmental management system

Name: Donald MacArthur

Position: Well Engineering Manager

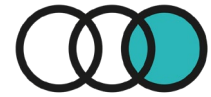
Signature:

Date: 03.03.2020

*The Turnkey Well Operator*

Aberdeen | Great Yarmouth | Rotterdam

**Figure 1 – FWM Environmental Policy**



### **3.4. Management Review & Audit**

Formal Management reviews take place on at least an annual basis. These reviews are fully documented and are used to assess the effectiveness of the management system in delivery the requirements of our Environmental Policy and objectives to ensure continuous improvement. Any actions arising from the meeting are completed without any undue delay and supported with evidence filed with the Management review documentation.

Auditing is also used to investigate how effectively each element of the management system is being applied. Results of these internal audits are also included and scrutinised at the management review.

### **3.5. Verification**

FWM have had ISO 14001 certification since 2017. This covers FWM's management of exploration, drilling, development and production operations. The most recent surveillance audit was in 13<sup>th</sup> August 2019.

### **3.6. FWM Objectives and Targets**

Senior management set objectives for the organisation in accordance with policy, ensuring that the necessary resources are provided and that managers are empowered to achieve the objectives. They continuously monitor performance and periodically conduct management review with the aim of continual improvement.

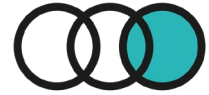
The company's commitments and actions for environmental management are incorporated in the Environmental Policy. These are supplemented by detailed lists of objectives for environmental management, prepared periodically. The agreed actions and targets to achieve these objectives are recorded in the Environmental Objectives & Targets Action Programme, a management system recorded document. When setting objectives and targets, FWM ensure that they are consistent with the company's Environmental Policy and CMAPP and take into account financial, operational and business requirements as well as technological options.

The Environmental Objectives & Targets Action Programme includes a defined review period with responsibility assigned to relevant functions and levels within the business. The programme targets are tracked either by the company's performance improvement process or by measurement in the company's environmental Key Performance Indicators.

These KPIs are reviewed at Management Review meetings on a regular basis to ensure visibility with senior management.

For FWM as a whole, Corporate QHSE Objectives & Targets are set at least once annually.

For individual projects, project-specific sets of HS&E Objectives & Targets are set at an early stage of the project and presented within Project HS&E Plans. Project O&T are monitored continuously through the project's duration including routine project progress meetings and meetings held with contractors.



## **4. 2019 ENVIRONMENTAL OBJECTIVES**

The FWM environmental management objectives and targets for 2019 were established in order to achieve the progressive commitments set out in our Environmental Policy Statement. The methodology is described in Section 3.6 and has also been applied to our 2020 and subsequent objectives.

The following 2019 Objectives were set:

- To consider the environmental impact of all of our activities
- To comply with all legislation obligations to achieve zero non-conformances
- Report all environmental related incidents, investigate and analyse them to prevent recurrence
- To have Zero PON 1 submissions
- Introduce new environmentally aware ideas
- Achieve zero overuse and zero omission of chemicals
- Continue the review, communication and internal audit of FWM's SEMS to ensure a suitable and robust system is in place to manage Company operations in accordance with Company policies and statutory regulations
- Ensure a thorough identification of Company environmental risks and opportunities and the needs and obligations associated with stakeholders
- Undertake an independent surveillance audit of our EMS to meet FWM's ISO 14001:2015 requirements
- Ensure a robust Well Examination Scheme remains in place for all well operations
- Ensure all communications are held with regulators and environmental stake holders for drilling campaigns
- Undertake S&E monitoring and management of our contractors is undertaken
- Schedule and ensure identified personnel undertake appropriate training
- Ensure environmental risk assessments are completed for all our major activities and those we work with
- Ongoing Implementation of the FWM Well Integrity Management System (WIMS)





## **5. 2019 ENVIRONMENTAL PERFORMANCE**

### **5.1. Overview of 2019 Activities**

This section provides a summary of our 2019 performance. A summary of offshore environmental aspects and their associated emissions and impacts is also provided.

#### **5.1.1. 2019 Performance Summary**

Progress against our Objectives and Targets was subject to bi-annual management review. All 2019 Objectives and Targets presented in Section 3.6 were met with no non-compliances incurred in any of the 3 well construction projects.

#### **5.1.2. Production Activities**

There no production well operations during 2019. FWM worked towards transition of the Babbage Installation and taking on the role of Production Well Operator.

#### **5.1.3. Drilling Activities**

In 2019 FWM drilled 3 appraisal wells in the UKCS as Well Operator.

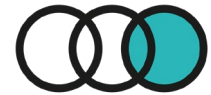
Drilling Oil Pollution Emergency Plans (OPEPs) were in place to cover these activities. Each OPEP lists the required offshore and onshore actions and responses, defines roles and responsibilities in the event of an oil spill and provides a dedicated risk assessment for each drilling campaign.

All drilling activities were undertaken using the respective drilling company's SEMS.

WELL NAME	LOCATION	START	END
Wick	11/24b, Central North Sea	13/12/2018	28/02/2019
Colter	98/11a, English Channel	02/02/2019	17/03/2019
Harvey	48/24b, Southern North Sea	02/08/2019	19/09/2019

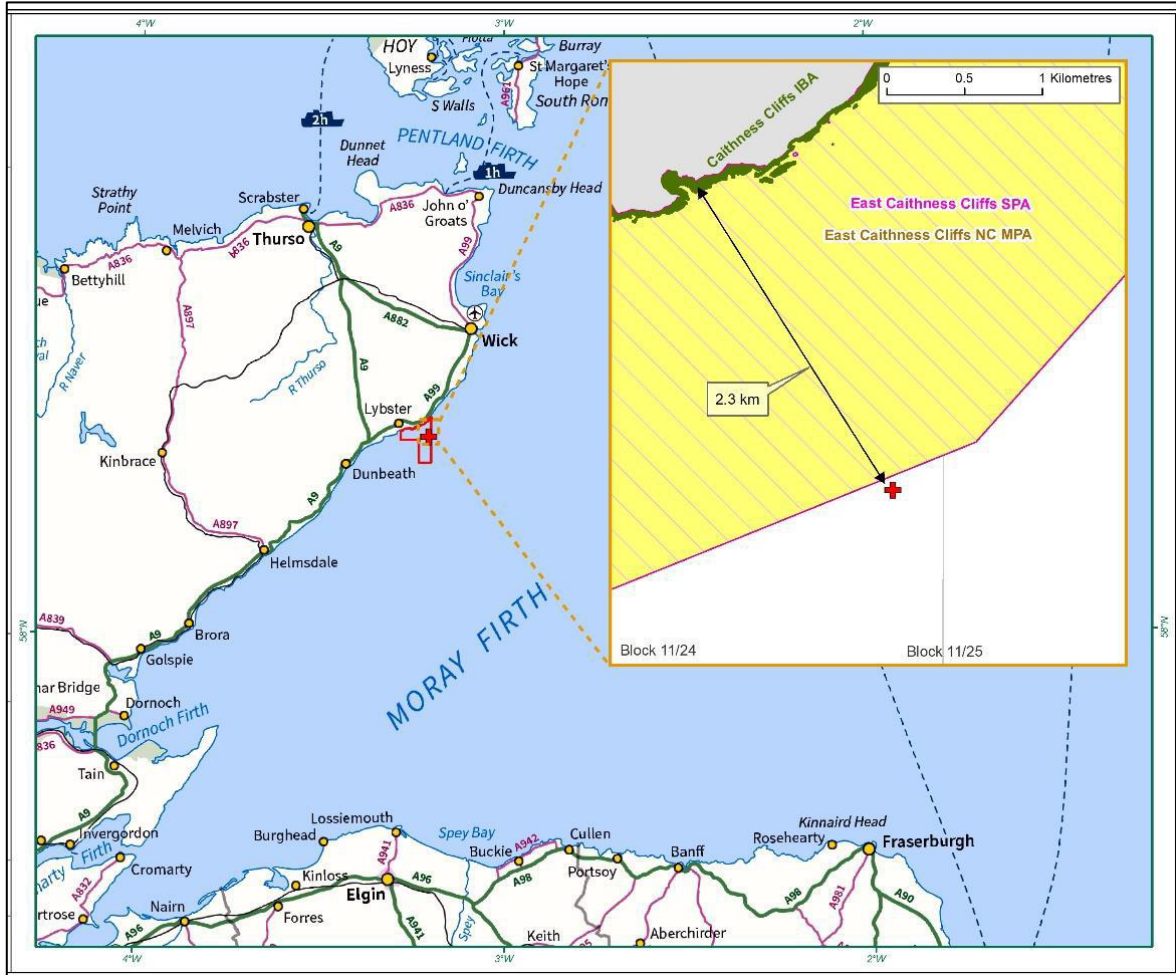
**Table 1 – 2019 Drilling Activities**

Summary Information from each of these activities is presented in the following sections and includes the totals for each campaign.



## 5.2. Drilling at Wick

Drilling operations for the Wick exploration well commenced in December 2018 and were completed in January 2019. The data presented in this report includes the portion of the well project falling in December 2018.

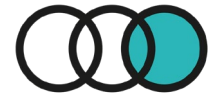


**Figure 2 – Wick Well Location**

The 11/24b-4 Wick well was drilled in four sections with an initial 36” hole being drilled riserless to a depth of 147.5m before 30” conductor was run and cemented in place. Thereafter, a 17 ½” section was drilled to 690m to allow a 13 ⅜” casing to be run and cemented at 690m. The 12 ¼” section was drilled to a depth of 838m and 9 ⅝” casing was successfully run and set at 834.88m. With the 9 ⅝” cemented the well was drilled to a total depth (TD) of 1000m in 8 ½” hole before being plugged and abandoned as planned, in accordance with UK regulations and Oil and Gas UK (OGUK) guidelines.

The well was drilled using the Ensko 72 jack-up MODU, the Duty Holder being Ensko Offshore UK Ltd.

As the Wick well was located within waters which extend seaward for 3 miles from the baseline from which the breadth of the territorial sea adjacent to Scotland is measured, the OCR Regulations did not apply in this instance. Notwithstanding this, FWM complied with the requirements of the OSPAR Decision as outlined below to give a complete picture of the company’s activity. Joint reporting to SEPA and OPRED was undertaken for the well.



**Figure 3 – Enscow 72 at Wick**

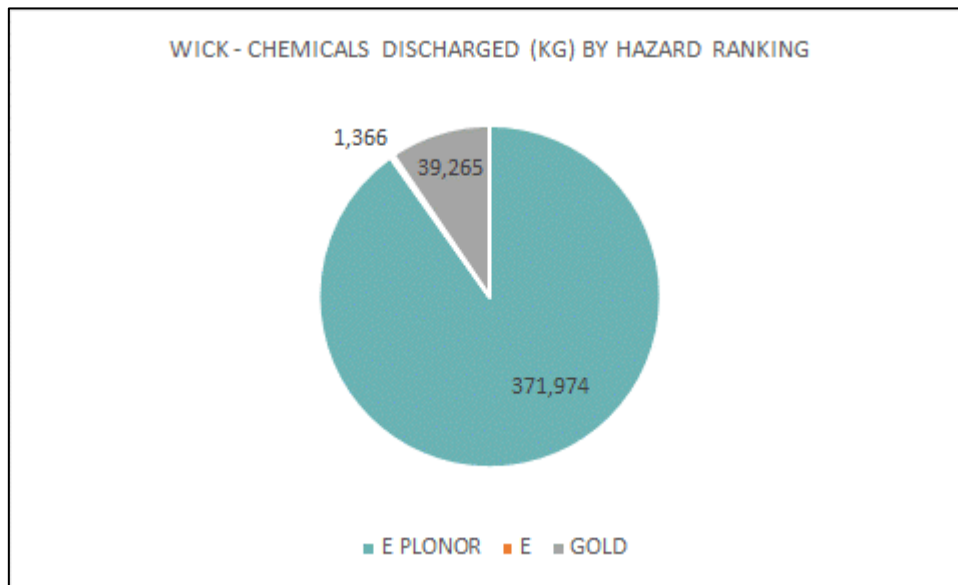
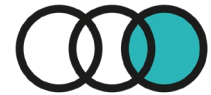
### 5.2.1. Discharges to Sea

#### Chemical Use

The total amounts of chemicals used and discharged in the drilling of the Wick well are presented below. Of the 730 tonnes of chemicals that were used during this operation, 92% were OCNS category E chemicals that are labelled as posing little or no risk to the environment (PLONOR). Only 0.1% were classified as requiring substitution (SUB). A description of the strategies the suppliers are employing to replace these chemicals was provided to BEIS as part of the annual substitution reporting.

HQ/OCNS RANKING	ADDITIONAL LABEL	USED	DISCHARGED	USED
		(kg)	(kg)	%
E	PLONOR	672,293	371,974	92.1%
E	-	2,753	1,366	0.4%
GOLD	-	54,283	39,265	7.4%
D	-	75	0	0.0%
B	SUB	749	0	0.1%

**Table 2 – Wick Chemical Usage**



**Table 3 – Wick Chemical Discharges (Kg)**

### Drilled Cuttings

The Wick well was drilled using water-based mud systems which allowed the majority of the 462t of drilled cuttings to be discharged to sea. As a precaution against hydrocarbon-bearing cuttings being encountered in the reservoir approximately 5t of cuttings were contained and returned to shore by skip for disposal.

#### 5.2.2. Atmospheric Emissions

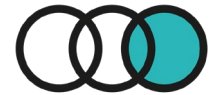
Source	Total Use	CO <sub>2</sub>	NO <sub>x</sub>	N <sub>2</sub> O	SO <sub>2</sub>	CO	CH <sub>4</sub>	VOC	Sulphur
	(t)	(t)	(t)	(t)	(t)	(t)	(t)	(t)	(%)
Diesel Engines (Power Generation)	157	502.40	9.33	0.03	0.63	2.46	0.03	0.31	0.0200

**Table 4 – Wick Atmospheric Emissions**

#### 5.2.3. Wick Non-Compliances

There were zero environmental non-compliances on the Wick well, all FWM 2019 Objectives and Targets were met:

- There were no incidents that required a submission of a Petroleum’s Operations Notice 1 notification (PON 1)
- All chemicals used while drilling Wick were authorised by the chemical permit
- The use & discharge levels of all chemical were within the authorised permit limits



### 5.3. Drilling at Colter

Drilling operations for the Colter appraisal well were conducted in February and March 2019.

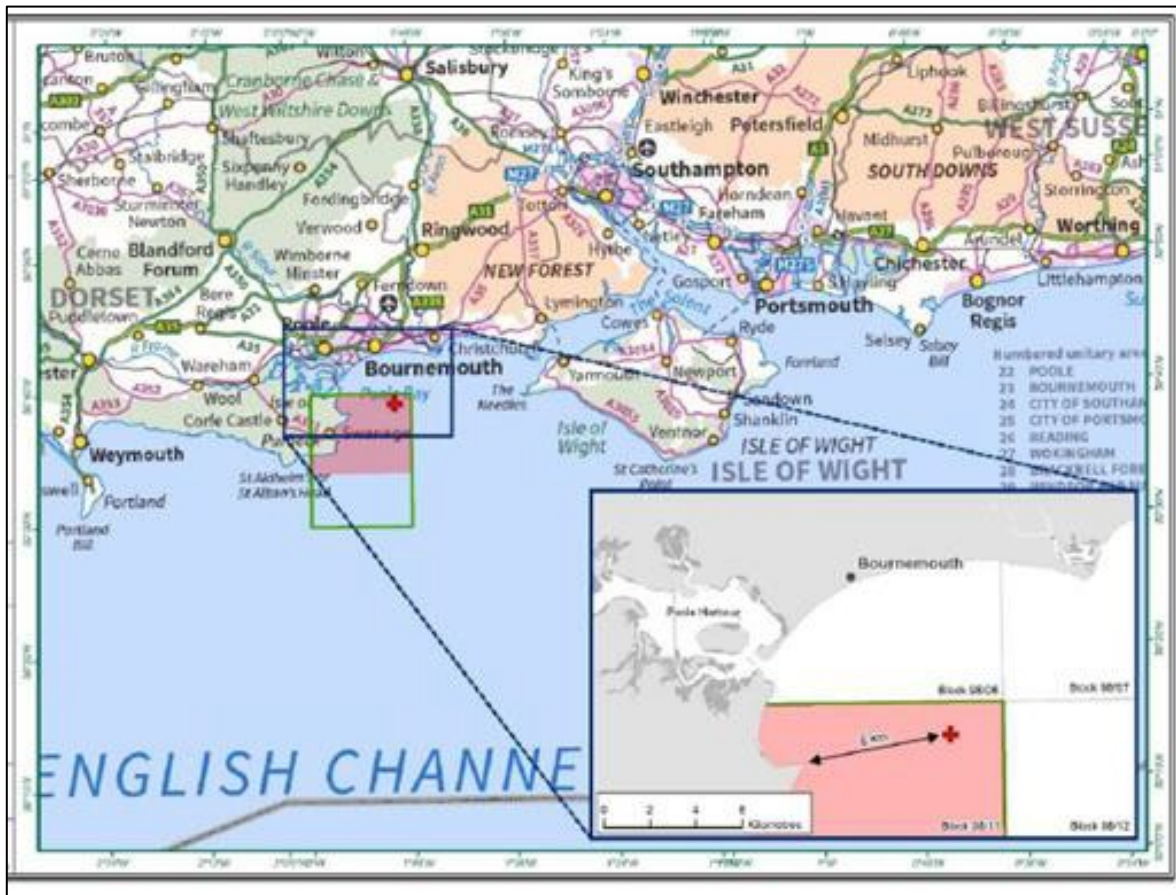
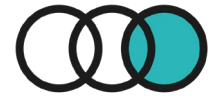


Figure 4 – Colter Well Location

The 98/11a-6 Colter well was drilled in four sections with an initial 36" hole being drilled riserless to a depth of 120m before 30" conductor was run and cemented in place. Thereafter, a 17 1/2" section was drilled to 839m to allow a 13 3/8" casing to be run and cemented. The well was then drilled to an initial TD in of 1,870m, in 12 1/4" hole section as per the base case well design and evaluated. The well was then sidetracked in 12 1/4" hole and drilled to 1,119mMD. The 9 5/8" casing was run and cemented before proceeding with the 8 1/2" hole section. This was drilled to a TD of 1,910mMD and evaluated. The well plugged and abandoned as planned, in accordance with UK regulations and Oil and Gas UK (OGUK) guidelines.

The well was drilled using the Ensco 72 jack-up MODU, the Duty Holder being Ensco Offshore UK Ltd.



**Figure 5 – EnSCO 72 at Colter**

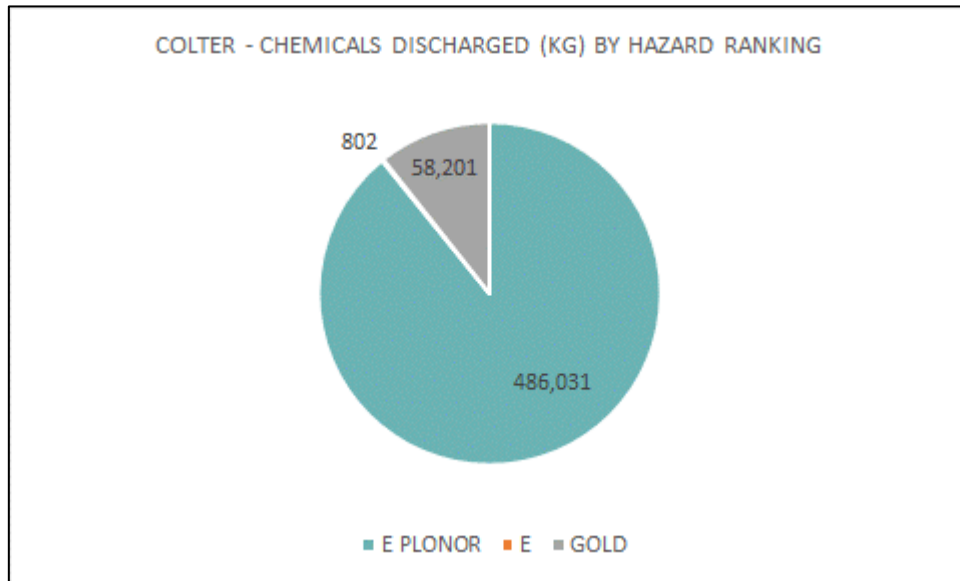
### 5.3.1. Discharges to Sea

#### Chemical Use

The total amounts of chemicals used and discharged in the drilling of the Colter well are presented below. Of the 888 tonnes of chemicals that were used during this operation, 91% were OCNS category E chemicals that are labelled as posing little or no risk to the environment (PLONOR). Only 0.1% were classified as requiring substitution (SUB). A description of the strategies the suppliers are employing to replace these chemicals was provided to BEIS as part of the annual substitution reporting.

HQ/OCNS RANKING	ADDITIONAL LABEL	USED	DISCHARGED	USE
		(kg)	(kg)	%
E	PLONOR	810,185	486,031	91.2%
E	-	950	802	0.1%
GOLD	-	76,173	58,201	8.6%
D	-	75	0	0.0%
B	SUB	900	0	0.1%

**Table 5 – Colter Chemical Usage**



**Table 6 – Colter Chemical Discharges (Kg)**

### Drilled Cuttings

The Colter well was drilled using water-based mud systems which allowed the 662t of drilled cuttings to be discharged to sea.

#### 5.3.1. Atmospheric Emissions

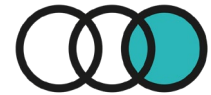
Source	Total Use	CO <sub>2</sub>	NO <sub>x</sub>	N <sub>2</sub> O	SO <sub>2</sub>	CO	CH <sub>4</sub>	VOC	Sulphur
	(t)	(t)	(t)	(t)	(t)	(t)	(t)	(t)	(%)
Diesel Engines (Power Generation)	223	712.96	13.23	0.00	0.89	3.50	0.00	0.45	0.1000

**Table 7 – Colter Atmospheric Emissions**

#### 5.3.2. Colter Non-Compliances

There were zero environmental non-compliances on the Colter well, all FWM 2019 Objectives and Targets were met:

- There were no incidents that required a submission of a Petroleum’s Operations Notice 1 notification (PON 1)
- All chemicals used while drilling Colter were authorised by the chemical permit
- The use & discharge levels of all chemical were within the authorised permit limits



### 5.4. Drilling at Harvey

Drilling operations for the Harvey appraisal well were conducted in February and March 2019.

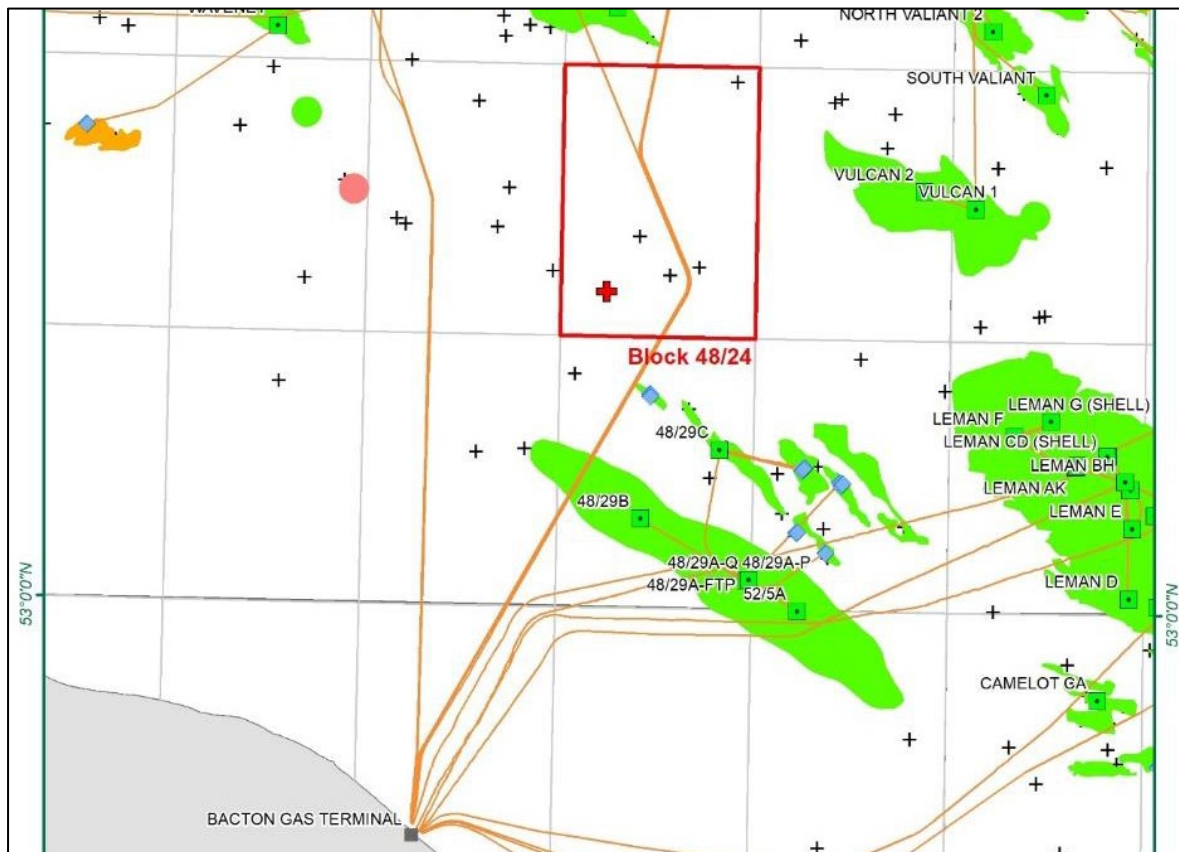
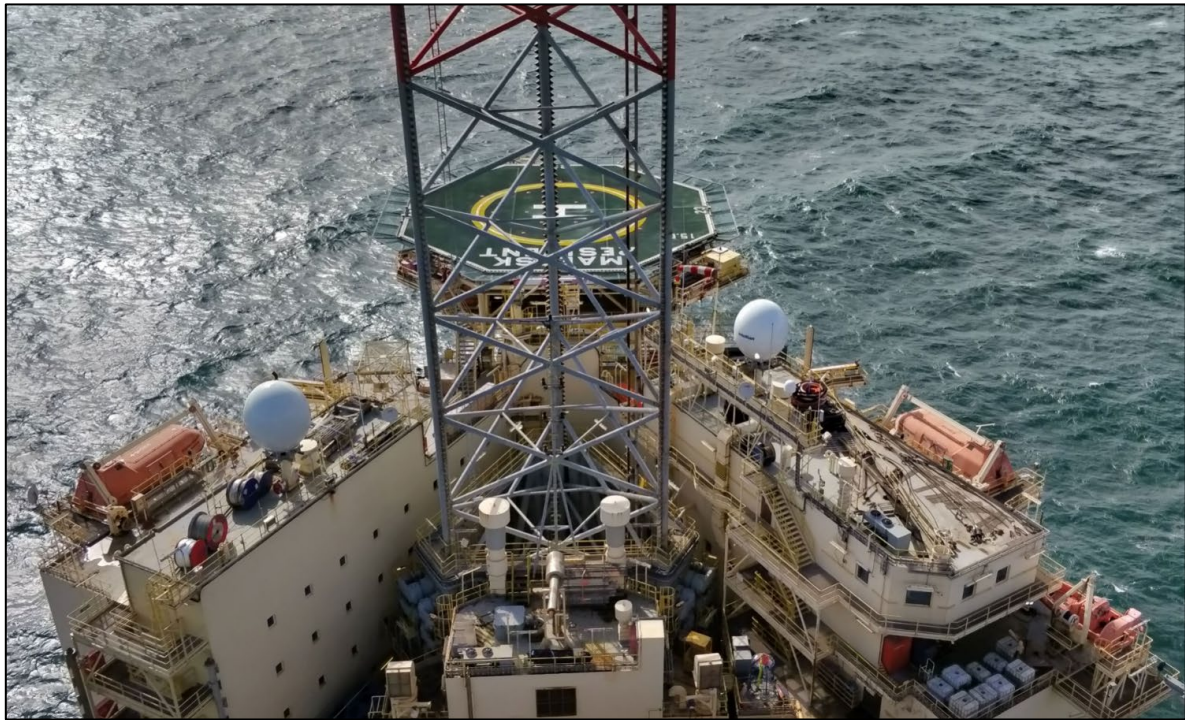
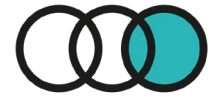


Figure 6 – Harvey Well Location

The 48/24b-6 Harvey well was drilled in four sections with an initial 26"x36" hole being drilled riserless to a depth of 147m before 30" conductor was run and cemented in place. Thereafter, a 17 1/2" section was drilled to 803m to allow a 13 3/8" casing to be run and cemented. The 12 1/4" section was drilled to a depth of 1809m and 9 5/8" casing was successfully run and set. With the 9 5/8" cemented the well was drilled and cored to a total depth (TD) of 2297m in 8 1/2" hole before being plugged and abandoned as planned, in accordance with UK regulations and Oil and Gas UK (OGUK) guidelines.

The well was drilled using the Maersk Resilient jack-up MODU, the Duty Holder being Maersk Drilling UK Limited.





**Figure 7 – Maersk Resilient at Harvey**

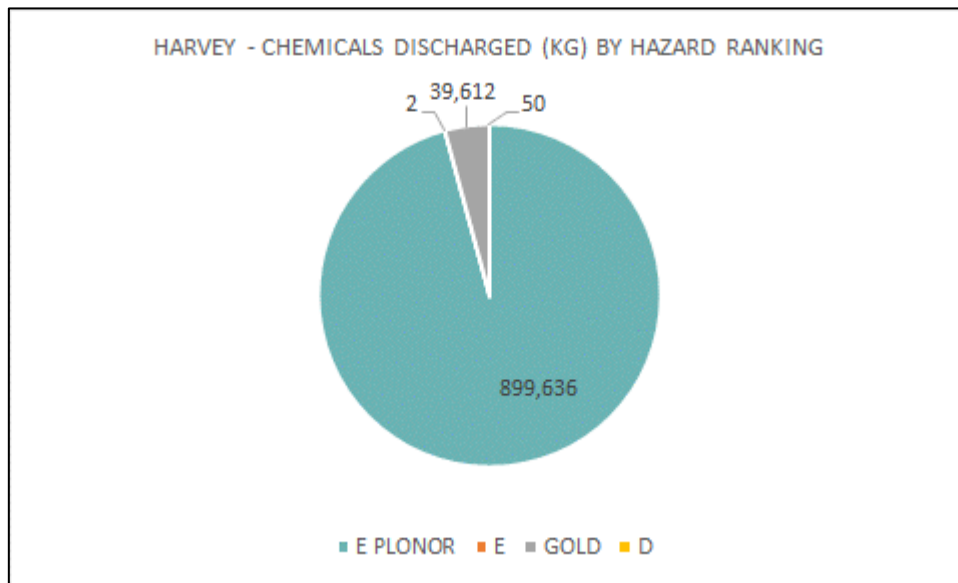
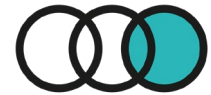
#### 5.4.1. Discharges to Sea

##### Chemical Use

The total amounts of chemicals used and discharged in the drilling of the Harvey well are presented below. Of the 1,756 tonnes of chemicals that were used during this operation, 95% were OCNS category E chemicals that are labelled as posing little or no risk to the environment (PLONOR). Only 0.3% were classified as requiring substitution (SUB). A description of the strategies the suppliers are employing to replace these chemicals was provided to BEIS as part of the annual substitution reporting.

HQ/OCNS RANKING	ADDITIONAL LABEL	USED	DISCHARGED	% USE
		(kg)	(kg)	
E	PLONOR	1,664,293	899,636	94.8%
E	-	1,265	2	0.1%
GOLD	-	61,354	39,612	3.5%
D	-	6,200	50	0.4%
C	-	17,482	0	1.0%
B	SUB	5,250	0	0.3%

**Table 8 – Harvey Chemical Usage**



**Table 9 – Harvey Chemical Discharges (Kg)**

### Drilled Cuttings

The top hole sections of the Harvey well were drilled with water-based drilling fluids before switching to oil-based fluids for the 12 ¼” and 8 ½” hole section, to mitigate against wellbore instability.

349t of water-based mud drilled cuttings were discharged and 220t of oil-wet cuttings contained and returned to shore for disposal.

#### 5.4.1. Atmospheric Emissions

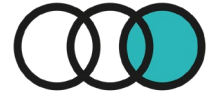
Source	Total Use	CO <sub>2</sub>	NO <sub>x</sub>	N <sub>2</sub> O	SO <sub>2</sub>	CO	CH <sub>4</sub>	VOC	Sulphur
	(t)	(t)	(t)	(t)	(t)	(t)	(t)	(t)	(%)
Diesel Engines (Power Generation)	1,003	329.60	6.12	0.02	0.41	1.62	0.02	0.21	0.1000

**Table 10 – Harvey Atmospheric Emissions**

#### 5.4.2. Harvey Non-Compliances

There were zero environmental non-compliances on the Harvey well, all FWM 2019 Objectives and Targets were met:

- There were no incidents that required a submission of a Petroleum’s Operations Notice 1 notification (PON 1)
- All chemicals used while drilling Harvey were authorised by the chemical permit
- The use & discharge levels of all chemical were within the authorised permit limits

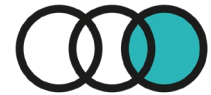


## **6. 2020 ENVIRONMENTAL OBJECTIVES**

Key Environmental Objectives that have been set by FWM for 2020 are as follows:

- We will consider the environmental impact of all of our activities
- To comply with all legislation obligations to achieve zero non-conformances
- Report all environmental related incidents, investigate and analyse them to prevent recurrence
- Continue the review, communication and internal audit of FWM'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 FWM's QHSE and CMAPP Policies
- Ensure a thorough identification of Company environmental risks and opportunities and the needs and obligations associated with stakeholders
- Undertake an independent surveillance audit of our EMS to meet FWM's ISO 14001:2015 requirements
- Ensure a robust Well Examination Scheme remains in place for all well operations
- Ensure all communications are held with regulators and environmental stake holders for future drilling campaigns
- Ensure all necessary submissions are made to regulators to support the environmental consenting process for any well operations for the Babbage development
- Undertake S&E monitoring and management of our contractors is undertaken
- Schedule and ensure identified personnel undertake appropriate training
- Ensure environmental risk assessments are completed for all our major activities and those we work with
- Ensure any environmental incidents are investigated and followed through to closeout
- Transition to Well Operator for the Babbage Installation production platform
- Ongoing Implementation of the FWM Well Integrity Management System (WIMS)

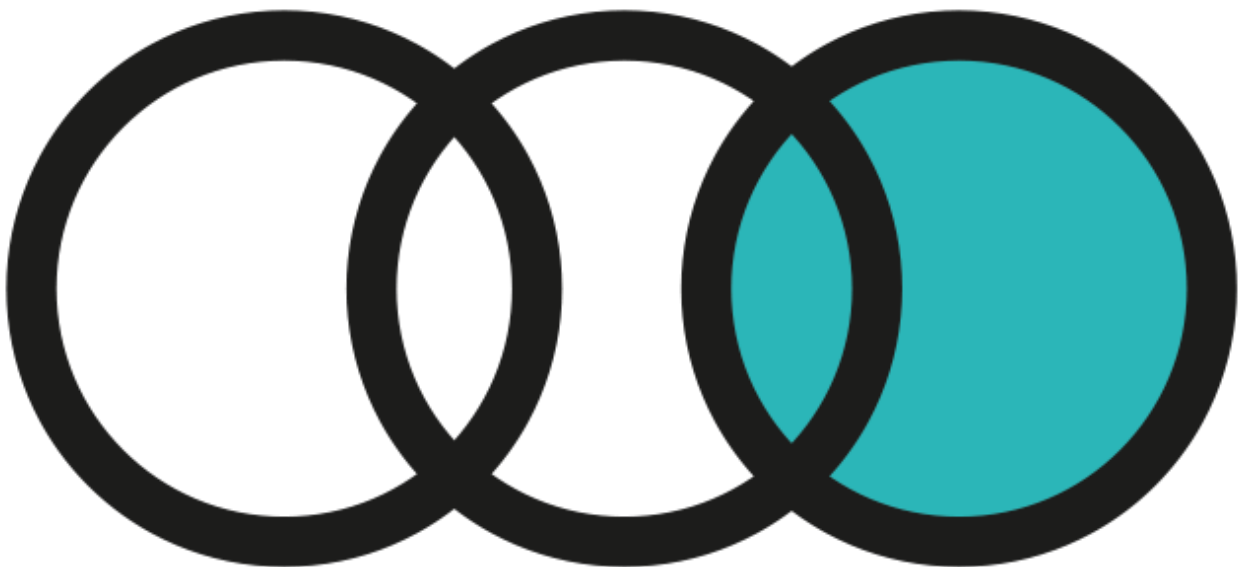
These objectives are subject to ongoing monitoring and review and are subject to biannual management reviews.



## 7. DOCUMENT REVISIONS & GLOSSARY

REV. NO.	DETAILED DESCRIPTION OF CHANGE
-	-

ABBREVIATION	MEANING
FWM	Fraser Well Management
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
FWM	Fraser Well Management
HSE	The Health and Safety Executive
ISO	International Standards Organisation
NUI	Normally Unattended Installation
MODU	Mobile Offshore Drilling Unit
O&T	Objectives & Targets
OCNS	Offshore Chemical Notification Scheme
OGA	Oil & Gas Authority
OPEP	Oil Pollution Emergency Plan
OPRED	Offshore Petroleum Regulator for Environment and Decommissioning
OSPAR	Oslo and Paris Commission
PLONOR	Poses Little Or No Risk to the environment
PON	Petroleum Operations Notice
SEMS	Safety and Environmental Management System
SEPA	Scottish Environmental Protection Agency
SH&E	Safety, Health and Environmental
UKCS	United Kingdom Continental Shelf
VOC	Volatile Organic Compounds
WES	Well Examination Scheme
WIMS	Well Integrity Management System



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# FWM Environmental Report 2019

Final Audit Report

2020-05-29

Created:	2020-05-29
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