


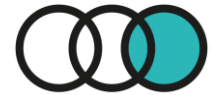


Fraser
Well Management

ENVIRONMENTAL REPORT
2020

| Name | Job Title | Date | Signature |
|------------------------------|-----------------------------|----------|---|
| Prepared by: P. Shand | HSE Manager | 18/05/21 |  |
| Reviewed by: D. MacArthur | Well Engineering Manager | 27/05/21 |  |
| Approved by: N. Ford | Managing Director | 27/05/21 |  |



Contents

| | |
|---|-----------|
| 1. INTRODUCTION | 2 |
| 2. FRASER WELL MANAGEMENT | 3 |
| 3. FWM ENVIRONMENTAL MANAGEMENT SYSTEM | 4 |
| 3.1. Introduction | 4 |
| 3.2. SEMS | 4 |
| 3.3. Environmental Policy | 4 |
| 3.4. Management Review & Audit | 6 |
| 3.5. Verification | 6 |
| 3.6. FWM Objectives and Targets | 6 |
| 4. 2020 ENVIRONMENTAL OBJECTIVES | 7 |
| 5. 2020 ENVIRONMENTAL PERFORMANCE | 8 |
| 5.1. Overview of 2020 Activities | 8 |
| 5.1.1. 2020 Performance Summary | 8 |
| 5.2. Production Well Operator Activities | 8 |
| 5.2.1. Chemical Use | 8 |
| 5.2.2. Atmospheric Emissions | 8 |
| 5.2.3. Non-Compliances or Discharges (Spills) | 8 |
| 5.3. Drilling Activities | 9 |
| 5.3.1. Discharges to Sea | 9 |
| 5.3.2. Atmospheric Emissions | 9 |
| 5.3.3. Non-Compliances or Discharges (Spills) | 9 |
| 6. 2021 ENVIRONMENTAL OBJECTIVES | 10 |
| 7. DOCUMENT REVISIONS & GLOSSARY | 11 |

Tables

| | |
|------------------------------------|---|
| Table 1 – Well Operator Activities | 8 |
|------------------------------------|---|

Figures

| | |
|-------------------------------------|---|
| Figure 1 – FWM Environmental Policy | 5 |
|-------------------------------------|---|



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 2020.

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 2020.



2. FRASER WELL MANAGEMENT

FWM was established in 2004 and is headquartered in Great Yarmouth (UK), with offices in Aberdeen (UK) and Rotterdam (The Netherlands). We provide cost-efficient and customised solutions to assist our clients in delivering their energy projects, safely, on time and within budget in all regions of the world. Our services cover the complete lifecycle of oil and gas wells, ranging from drilling, well intervention, production and maintenance through to abandonment – both onshore and offshore. With strong well engineering and wellsite supervision expertise and an extensive well track record of high-quality results, FWM provides a comprehensive package of well management services, including well engineering, project management, well operatorship, abandonment and commercial services.

At FWM we recognise that our activities interact with and have an impact upon the environment, therefore we have an ethical responsibility to minimise the effects of our activities. FWM have committed to continue to assess our impacts alongside opportunities for further reduction, while supporting the UK's net-zero 2050 ambition using our skills, resources and expertise in an effort to reach this goal.

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 2020.

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 assist in meeting our obligations, the company continues to maintain a certified Integrated Management System (IMS), which includes the Safety and Environmental Management System (SEMS).

3.2. SEMS

Fraser Well Management operates under an integrated management system and 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 and control of safety and environmental aspects related to FWM's responsibilities as Well Operator.

The key components of the FWM SEMS are as follows:

- Health & Safety Policy
- Environmental Policy
- Corporate Major Accident Prevention Policy (CMAPP)
- Health & Safety and Environmental Procedures
- Business Support Procedures
- Operational 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 responsible environmental management is expressed in the Environmental policy.

This is disseminated throughout the FWM organisation to all FWM personnel and our key contractors. At each revision, the policy is discussed with all employees and feedback obtained. FWM believe the awareness and understanding of the policy and our objectives - while showing active management commitment to environmental performance - promotes and enables ownership and responsibility.



ENVIRONMENTAL POLICY

HSEQ-POL-002 Rev 2



Fraser Well Management's vision is to be recognised as an environmentally responsible well operator by our employees, stakeholders, clients, regulator and the public. FWM aims to minimise the risk to the environment with a goal of zero harm.

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:

- support the UK's Net-Zero ambitions using our skills, resources and expertise within the company in an effort to reach this goal
- assess the impact our activities may have on the environment and put protective measures in place
- measure and control the impact our activity, including our company carbon footprint, 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: Nick Ford

Position: Managing Director

Signature: 
NICK FORD (001 24, 0011 1700 0011)

Date : Apr 26, 2021

Figure 1 – FWM Environmental Policy



3.4. Management Review & Audit

Formal Management reviews take place on an annual basis, at a minimum. These reviews are documented and assess the effectiveness of the management system in delivering the requirements of our Environmental Policy & objectives and ensure the correct focus and resource allocation as part of continuous improvement. In addition to the formal review, FWM monitor the ongoing management system arrangements and Environmental performance on a regular basis to ensure they reflect the needs of the organisation, clients and stakeholders.

Internal auditing is also used to examine how effectively each element of the FWM management system is being applied. Results of these audits are included and scrutinised at management review, as well as at weekly management system and performance review meetings. External audits are also performed as part of assessing FWM contractor's environmental management system and procedures, compliance with contractual and regulatory requirements, and determining their environmental performance – either at pre-contract award or on an ongoing suitability basis.

3.5. Verification

In addition to the internal audit programme and assessment of environmental performance undertaken internally, FWM continue to maintain external certification to ISO 14001 as an integral part of our business and management system approach. This certification and evaluation applies across FWM's management of; Well Engineering, Well Operations Management and the Full Well Life Cycle Management Services. The most recent surveillance audit was September 2020.

3.6. FWM Objectives and Targets

Environmental objectives for the organisation begin at policy level and are continued through to supporting policies and procedures to ensure clear and consistent communications. Senior personnel and line managers are expected to contribute to the setting, monitoring and reporting on both corporate and project specific objectives, while demonstrating active support to their achievement.

When setting objectives and targets, FWM ensure that these are consistent with the company's Environmental Policy and CMAPP and take into account financial, operational and business requirements. Additional focus is also placed on assessing technological options, industry and stakeholder expectations, and opportunities to further reduce environmental impacts as part of supporting UK Net Zero emissions and evolving opportunities.

The Environmental Policy objectives are assessed on a minimum of an annual basis, recorded and tracked formally as part of management system (Environmental Objectives & Targets Action Programme) arrangements, and also at frequent business reviews such as HSE dashboard, KPI and performance reporting reviews.

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. These objectives and targets are monitored continuously through the project's duration including routine project progress meetings with client, contractor and stakeholder personnel.



4. 2020 ENVIRONMENTAL OBJECTIVES

The FWM environmental management objectives for 2020 were established in order to achieve the progressive commitments set out in our Environmental Policy Statement. During the year these objectives were subject to further review and revision to include additional scrutiny and content on our Environmental approach and led to a focus on Net Zero and development of an environmental roadmap. The methodology is described in 3.6 above and continues to be applied to 2021 objectives.

The following 2020 Objectives were set:

- We will consider the environmental impact of all of our activities as part of business and risk assessments, including review of aspects and impacts register
- To comply with all legislation obligations to achieve zero non-conformances
- To have Zero unplanned discharges (PON1) submissions
- 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 Environmental Policy
- 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 communications are held with regulators and environmental stake holders for future campaigns
- Hold specific year end FWM update and engagement with Regulatory Authorities (HSE & BEIS)
- Ensure all necessary submissions are made to regulators to support the environmental consenting process for any well operations, transitions or appointments
- Undertake environmental monitoring and management of our contractors (where appropriate)
- Schedule and ensure identified personnel undertake appropriate training
- Ensure environmental risk assessments are completed for all our major activities and those we work with
- Complete implementation of the FWM Well Integrity Management System (WIMS)
- Formation of Environmental workforce committee, terms of reference, roadmap & framework
- Benchmark and identify additional environmental (Net Zero and Green House Gas (GHG)) opportunities and targets
- Select GHG accounting method and specification. Calculate and report baseline company emissions for 2019
- Undertake additional Net Zero and Environmental awareness training for employees



5. 2020 ENVIRONMENTAL PERFORMANCE

5.1. Overview of 2020 Activities

This section provides a summary of our 2020 performance. A summary of offshore environmental aspects and their associated emissions and impacts is also provided.

5.1.1. 2020 Performance Summary

Progress against our Objectives and Targets was subject to annual management review. All 2020 Objectives and Targets listed in Section 4.0 were met with no non-compliances or spills incurred.

5.2. Production Well Operator Activities

During 2020 FWM worked towards and completed transition of the Babbage Installation Production Well Operator role and continue to work closely with the asset Duty Holder (ODE) and Licensee (NEO Energy).

The company was also appointed Well Operator by NEO Energy (Licensee) for the Victoria subsea well, and by Bridge Petroleum (Licensee) for the Darwin subsea well.

As part of asset onboarding and continued operations, safety management interface and emergency response documentation is in place and continues to be assessed as part of management system interfacing, response arrangements and readiness.

A summary of assets, responsibility and OPEP arrangements are defined in Table 1 below.

| ASSET/WELL | RESPONSIBILITIES | ASSET STATUS | OPEP |
|------------------|---|--|----------------------------|
| Babbage Platform | <ul style="list-style-type: none"> Licensee – NEO Energy Duty Holder - ODE Well Operator - FWM | Producing (Gas) | OPEP not required |
| Victoria Well | <ul style="list-style-type: none"> Licensee – NEO Energy Well Operator - FWM | Shut-in & disconnected, awaiting abandonment | Consolidated OPEP (active) |
| Darwin Well | <ul style="list-style-type: none"> Licensee – Bridge Petroleum Well Operator - FWM | Suspended, awaiting abandonment | OPEP not required |

Table 1 – Well Operator Activities

As described in section 1.0, the information provided in this report provides information on environmental matters associated with operations which were directly under FWM control as Well Operator. The following section 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.

5.2.1. Chemical Use

Nothing to report in 2020.

5.2.2. Atmospheric Emissions

Nothing to report in 2020.

5.2.3. Non-Compliances or Discharges (Spills)

Nothing to report in 2020.



5.3. Drilling Activities

In 2020 no drilling was undertaken in the UKCS by FWM as Well Operator. In light of this, and as part of the company's ongoing assessment of emergency response requirements and documentation in support of operational drilling activities, the existing onshore OPEP was withdrawn in October.

For completeness, the following summary information and headings have been retained, although no activity took place during the period.

5.3.1. Discharges to Sea

Chemical Use

Nothing to report in 2020.

Drilled Cuttings

Nothing to report in 2020.

5.3.2. Atmospheric Emissions

Nothing to report in 2020.

5.3.3. Non-Compliances or Discharges (Spills)

Nothing to report in 2020.

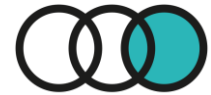


6. 2021 ENVIRONMENTAL OBJECTIVES

Key Environmental Objectives that have been set by FWM for 2021 are as follows:

- Consider the environmental impact of all of our activities as part of business and risk assessments
- Review and update the FWM Environmental aspects and impacts register, and associated risks and opportunities register
- Comply with all legislation obligations to achieve zero non-conformances
- To have zero unplanned discharges (PON1) submissions
- 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
- Undertake a minimum of one formal review of FWM's Environmental Policy
- Undertake an independent surveillance audit of our EMS to meet FWM's ISO 14001:2015 requirements
- Ensure a robust Well Examination Scheme and Well Integrity (WIMS) monitoring programme remains in place for all well operations
- Ensure proactive communications are held with regulators and environmental stake holders for future campaigns
- Hold specific year end FWM update and engagement with Regulatory Authorities (HSE & BEIS)
- Ensure all necessary submissions are made to regulators to support the environmental consenting process for any well operations, transitions or appointments
- Undertake environmental monitoring and management of our contractors (where appropriate)
- Schedule and ensure identified personnel undertake appropriate training
- Ensure environmental risk assessments are completed for all our major activities and those we work with
- Continue to support Environmental workforce committee activities and roadmap
- Continue to benchmark and identify additional environmental (Net Zero and Green House Gas (GHG)) opportunities and targets
- Benchmark company activities against OGA Stewardship (11) requirements and update environmental roadmap plans (as appropriate)
- Calculate and report baseline company emissions for 2020
- Identify and propose well design, or operations opportunities for further Net Zero reductions
- Identify key stakeholders and undertake engagement on company environmental plans and opportunities

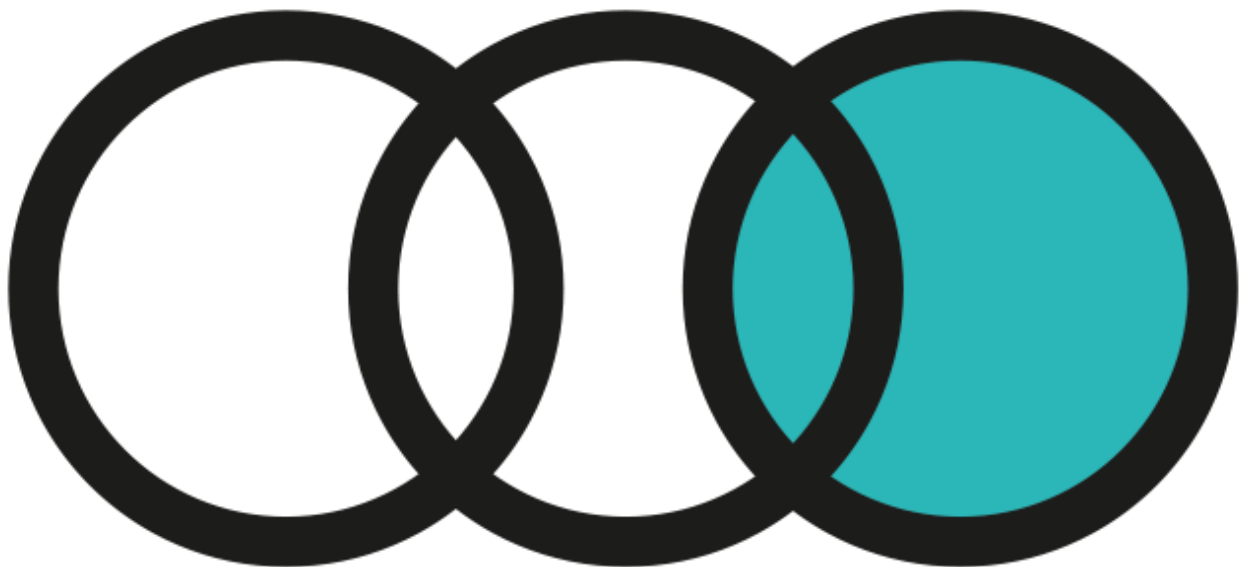
These objectives are subject to ongoing monitoring and review and are subject to biannual management reviews.



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 |



3 Albert Street
Aberdeen
Aberdeenshire
Scotland
AB25 1XX

Beacon Innovation Centre
Gorleston
Great Yarmouth
Norfolk
NR31 7RA

Westplein 12
3016 BH
Rotterdam
Netherlands