



TULLOW OIL SK LIMITED

Environmental Management System Public Statement for 2020 UK Operations

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Revision History

Rev	Date	Reason for Issue	Prepared	Checked	Approved
0	28/05/2021	For issue as per OSPAR 2003/5	J. Girling	D. Scales	F. Uliana
<i>Signatures, if required</i>					

Revision Control

Revision:	Para /Sect	Change Description

This sheet must be completed in detail, at each revision once this document has been approved. Details must include revision number, description and indication of which pages and paragraphs have been revised, date of revision approval and approval indication.

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Definitions / Abbreviations

ALARP	As Low As Reasonably Practicable
BEIS	(Department for) Business, Energy and Industrial Strategy
CEO	Chief Executive Officer
EHS	Environment, Health and Safety
IMS	Integrated Management System
KPI	Key Performance Indicator
LTI	Lost Time Incident
LOPC	Loss Of Primary Containment
OGP	(International Association of) Oil & Gas Producers
OSPAR	Oslo/Paris Convention
P&A	Plug and Abandon
Tullow	Tullow Oil Schooner and Ketch
UKCS	United Kingdom Continental Shelf
WHPS	Wellhead Protection Structure

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1. Introduction

Under the OSPAR Recommendation 2003/5, the Department Business, Energy and Industrial Strategy (BEIS) require that all existing UKCS oil and gas operators undertaking offshore operations during 2020 must prepare an annual statement of their environmental performance, covering that calendar year, and make that statement available to the public. This document represents Tullow Oil SK Limited (Tullow) annual public environmental statement for 2020 in relation to UKCS OSPAR reporting.

2. Tullow's Background

Tullow Oil PLC is a global oil and gas exploration and production company with its headquarters in London, UK. Its primary focus is in African and Atlantic margin operations.

In the UK, Tullow's assets lie in the Southern North Sea Gas Basin. All of these assets have ceased production and in 2020 the final phase of decommissioning was completed.

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3. The Environmental Management System

Tullow is committed to the delivery of a consistent and high standard of environmental, health, safety and social performance throughout the planning and undertaking of all of its operations. Tullow senior management are committed to this with its Safe and Sustainable Operations Policy approved by the Board and signed by our CEO. (Figure 4-1).

As a responsible operator, we are committed to:

- Managing our environmental and social impacts;
- Keeping our people and our assets safe and secure;
- Maintaining our asset integrity and being prepared for major emergencies;
- Ensuring our high standards are upheld throughout our supply chain;
- Protecting the human rights of the communities we operate among; and
- Providing two-way communication with people about the extent of our activities and how they might affect them.

Tullow has developed and implemented an Integrated Management System (IMS) that sets out key business standards which are maintained across the company. Our business model addresses the fundamentals that we must have in place to manage our risks and help us deliver our strategy. These include strong and effective risk management, high standards of governance, transparency and anti-corruption, developing a multi- disciplined and diverse entrepreneurial team and making a positive and lasting contribution where we operate.

One of these standards is Non-Technical Risk (T-SEA-STD-0001) which sets out the mandatory framework through which the business shall consistently and proactively identify, assess, mitigate, and monitor social and environmental impacts, and stakeholder issues. This enables Tullow to comply with legislation, and other relevant standards, to manage environmental risks effectively and to demonstrate continual improvement.

Tullow regularly reviews its policies, procedures and management systems that support the highest standards of governance and corporate responsibility. The Group has a framework for the consistent application of the standards that all Tullow operations must comply with. This is safeguarded through corporate governance processes together with monitoring and oversight by the Board. Benchmarking is achieved through Internal Audit reviews.

Tullow is certified to the international standard for environmental management systems – ISO 14001 (see Figure 4.2 below).

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Figure 4-1: Tullow's Safe and Sustainable Operations Policy

TULLOW OIL PLC
POLICY STATEMENT

Safe and Sustainable Operations

Our goal is to create a working environment where we cause no harm to people, we minimise our negative environmental and social impacts, and we seek to optimize the shared benefits with our stakeholders. Everyone who works for, or on behalf of, Tullow is responsible for ensuring that the requirements set out in this Policy are fully met in all aspects of our business.

To achieve these we will:

- Always comply with the law or Tullow Standards, whichever sets higher requirements, and hold our contractors to the same;
- Systematically identify and assess process safety, environmental, climate, health, occupational safety, security and social risks and manage them proactively;
- Set goals and targets, and measure performance against them to continuously improve our performance;
- Deploy the necessary resources to ensure Tullow employees understand that Safe & Sustainable Operations are core part of each of our individual responsibilities, supported by strong, visible leadership;
- Protect the environment and prevent pollution in our operations;
- Actively work to reduce our operational carbon emissions to manage climate risks and their impacts;
- Neither explore for nor exploit oil in World Heritage Sites and always mitigate the potential for operations to impact areas of natural and cultural value prior to undertaking any activity;
- Design, build and maintain safe working conditions and take responsibility for the health and wellbeing of our staff and contractors;
- Aim to create positive, tangible and sustainable contributions to the economic and social development of the communities and countries where we operate; and
- Communicate openly and respect the opinions of those who may be affected by our operations.

Safe and sustainable operations in all company activities is core to how we work. Everyone in Tullow or working on our behalf is empowered to stop any activity they regard to be in conflict with this Policy.



Rahul Dhir
Chief Executive Officer – Tullow Oil plc
October 2020



T-HSS-POL-0001 Revision 4

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Figure 4-2: Tullow's ISO 14001 certification



Certificate of Approval

This is to certify that the Management System of:

Tullow Group Services Limited

TOSK Oil SK Ltd

9 Chiswick Park, Chiswick, London, W4 5XT, United Kingdom

has been approved by LRQA to the following standards:

ISO 14001:2015

David Derrick

David Derrick - Area Operations Manager UK & Ireland

Issued By: Lloyd's Register Quality Assurance Limited

This certificate forms part of the approval identified by approval number: 0004917

Current Issue Date: 1 June 2018
 Expiry Date: 31 May 2021
 Certificate Identity Number: 10075404

Original Approvals:
 ISO 14001 – 21 May 2003

Approval Number(s): ISO 14001 – 0004917-001

The scope of this approval is applicable to:

Activities including and associated with decommissioning of its Thames assets.



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3.1. UKCS Offshore Operations

The Thames Decommissioning activities were planned to be executed in a five phase programme. The following phases have either already been completed or are currently on going:

- Phase I work scope was successfully completed in May 2015, achieving the objective of a hydrocarbon-free system across the Thames field. This phase involved the flushing and cutting of interconnecting pipelines to all producing wells, decommissioning and disconnecting subsea control systems to Orwell and Wissey subsea trees, installing shallow and deep set plugs in the two Horne & Wren (H&W) platform wells, partial removal of topside equipment from the H&W NUI (Normally Unmanned Installation) and an ROV (Remotely Operated Vehicle) visual survey of all ten subsea wells;
- Phase II work scope was successfully completed in 2016/2017 with the plug and abandonment (P&A) of the two H&W platform wells (August 2016), preparatory work for the dismantling and removal of the H&W NUI (August 2016) and the removal and disposal of the H&W NUI topsides and jacket (March 2017). Seabed clearance work at the H&W platform location was completed in 2018;
- Phase III work scope was partially completed in 2018 with the P&A of seven out of ten suspended subsea exploration, appraisal and gas producer wells, including the removal of a Subsea Xmas Tree. The remaining scope, the P&A of the last three suspended subsea exploration and appraisal wells, including the removal of an Over Trawlable Structure over the Cameron well was completed in 2019 (Petrofac was the Well Operator for this work and therefore this work is not reported in this document);
- Phase IV a) & b) work scope was completed by Tullow in 2019 and included the removal and dispose of a well head protection structure (WHPS) at Orwell, Wissey and Thurne production wells, 5 x 30" conductors and a subsea template structure;
- Phase IV c) work scope will include seabed clearance and post-clearance surveys at Orwell, Horne and Wren, Wissey, Thames and Thurne location and is and is reported in this document;
- Phase V work scope will include base line surveys and ongoing monitoring of the locations.

3.2. 2020 Environmental Reporting

During 20120, Tullow completed Phase IV c) seabed clearance work at five locations in the southern North Sea (Orwell 50/26a, Horne and Wren 53/3, Wissey 53/04d, Cameron 44/19 and Thurne / Thames End 49/28 (Figures 4.3 and 4.4)):

The Seabed Clearance work was as follows:

Orwell:

- The Orwell pipelines PL931, PL932 and umbilical PL933 were located on the 'As Found' Survey using the sonar. On a close visual inspection, the Orwell 3 inch Pipeline (PL932) was found to be buried and was therefore left in situ. PL931 and PL933 were successfully sheared at 6.8 and 4.8 metres respectfully from the original cut end and recovered to shore. An existing mattress was placed over Horne and Wren pipeline. The other 5 mattresses were recovered to shore.

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Horne and Wren:

- There was a mattress partially covering the top of the conductor. All 3 items (conductor, single mattress and grout) were displaced by using one explosive charge and some 8.6 tonnes of debris (including grout) was recovered and disposed of onshore.

Wissey:

- An 'As Found' Survey was conducted and the mattresses covering the cut end of the 8 inch pipeline (PL2491) were located and recovered to surface. This exposed a length of pipe >5.5m which was cut and recovered to surface. After recovering three 1 tonne bags, filled with grout, and 24 individual 22kg grout bags, a general visual survey was conducted to locate the cut end of 4.5 inch umbilical (PLU2492). However, the cut end of the umbilical could not be located, therefore it was assumed to be self-buried. An 'As Left' Survey was conducted prior to leaving the location.
- Following the offshore operations completed in December 2020, a successful 'over trawlable' Survey was conducted during March 2021.

Cameron:

- Removal of a 3.2 metre length of the Cameron 30 inch diameter conductor and grout from the grout mound.

Thurne and Thames End:

- Removal of two mattresses at Thurne field end and then removal of 4.35m section 8 inch Pipeline (PL1637) close to former Thames AR platform location.

Figure 4-3: Orwell, Thurne, Thames End, Horne and Wren & Wissey Seabed Clearance Work Location Map

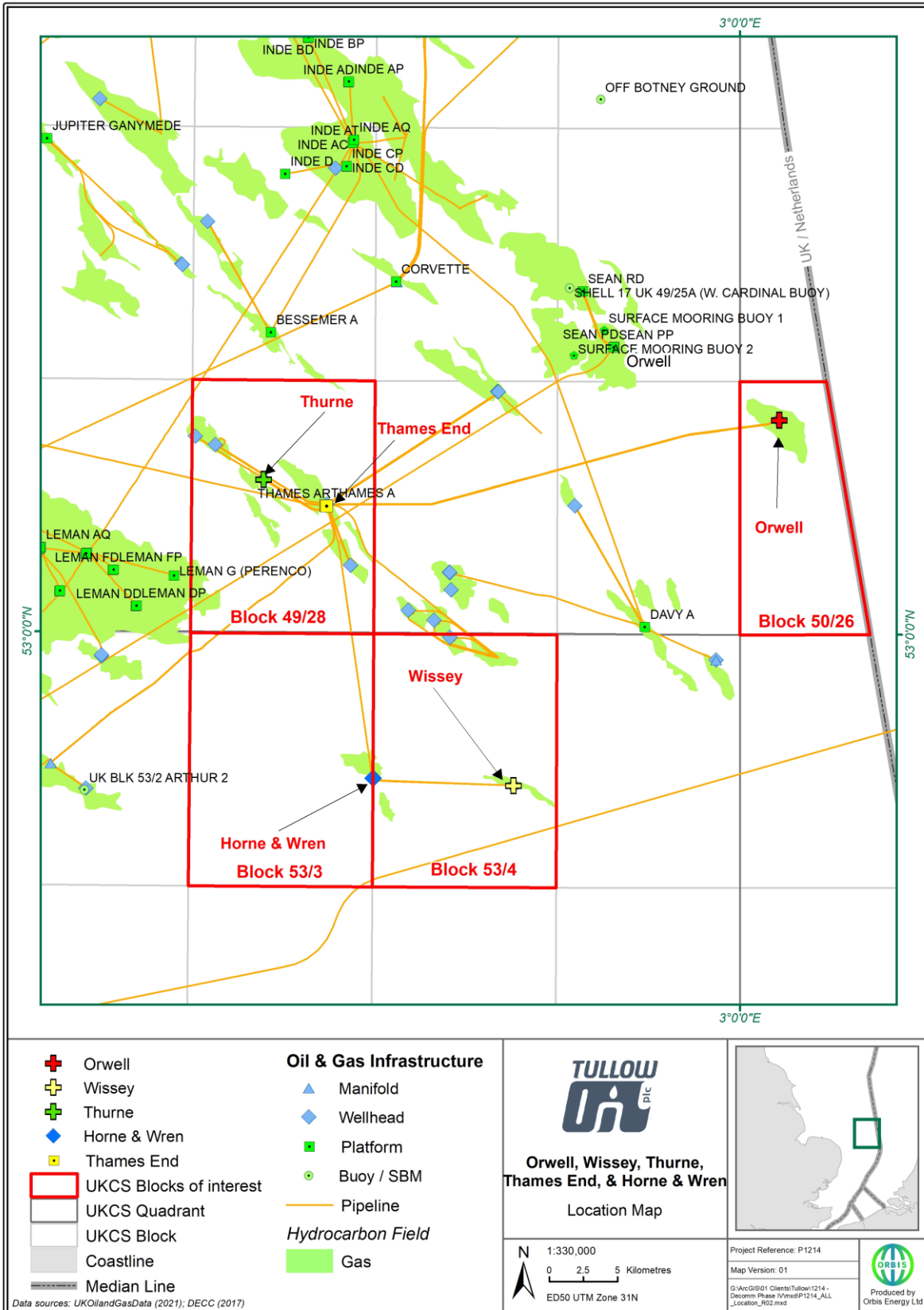
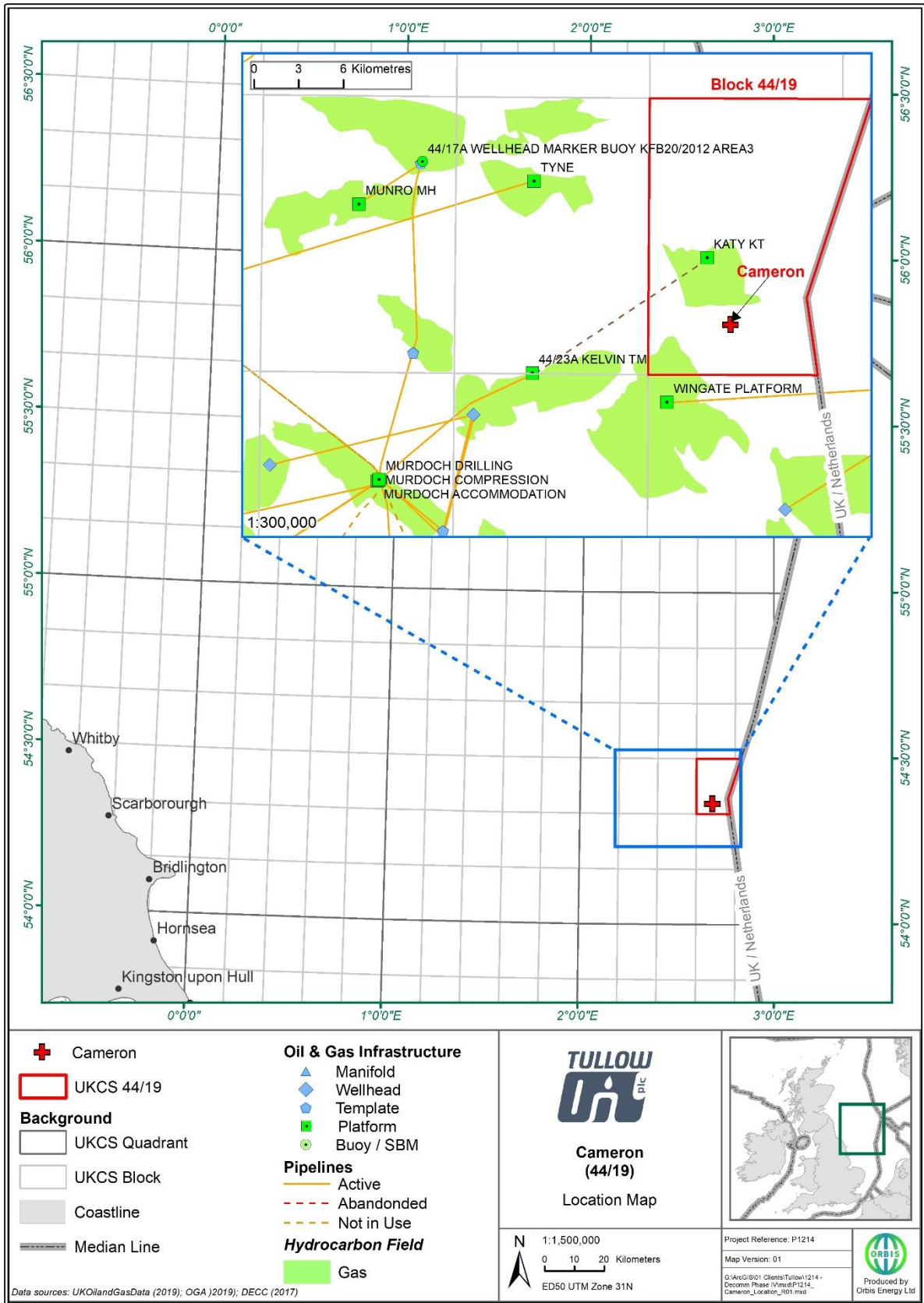


Figure 4-4: Cameron Seabed Clearance Work Location Map



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3.3. Summary of Reportable Emissions

Reportable emissions from Phase IV c) operations undertaken in 2020 are provided in table 4-1

Table 4-1 Tullow's 2020 UKCS Reportable Emissions

Environmental Indicator	Unit	Horne & Wren	Wissey	Orwell	Cameron	Thurne and Thames End
Gas/Oil Production						
Production Pipelines	-	0	0	0	0	0
Spills						
Chemical release	No. incidents	0	0	0	0	0
Hydrocarbon releases	No. incidents	0	0	0	0	0
Atmospheric Emissions						
Fuel consumption (diesel)	Tonnes	0	0	0	0	0
Flaring (natural gas)	Tonnes	0	0	0	0	0
Chemical Usage and Discharges						
Gold (use / discharge)	Kilogrammes	0	0	0	0	0
Silver (use / discharge)	Kilogrammes	0	0	0	0	0
SUB* (use / discharge)	Kilogrammes	0	0	0	0	0
A (use / discharge)	Kilogrammes	0	0	0	0	0

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Environmental Indicator	Unit	Horne & Wren	Wissey	Orwell	Cameron	Thurne and Thames End
B (use / discharge)	Kilogrammes	0	0	0	0	0
C (use / discharge)	Kilogrammes	0	0	0	0	0
D (use / discharge)	Kilogrammes	0	0	0	0	0
E (use / discharge)	Kilogrammes	0	0	0	0	0
OPPC Pipeline Discharges						
Oil on fluids	Tonnes	0	0	0	0	0
Waste						
Special (Group I) Hazardous	Tonnes	0	0	0	0	0
General (Group II) Non-hazardous	Tonnes	0	0	0	0	0
Other (Group III)	Tonnes	0	0	0	0	0

Note no permissible chemicals were used for the 2020 Scope of Work, hence nil return

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3.4. Project EHS Objectives and Targets

Corporately Tullow set annual Safe and Sustainable Operations targets and performance monitoring metrics, which are tailored to become Business Unit specifics that reflect the particular set of challenges associated with that particular operation.

Tullow has the overall goal of decommissioning the assets in the most expeditious and economical way possible commensurate with best oilfield practice and prudent risk management. Within this context, the overall EHS goal is that all risks to personnel, the environment and the assets are identified and eliminated or minimised to ALARP levels.

Specific EHS objectives for the Thames Decommissioning project, include

- EHS performance will not be compromised by commercial or schedule pressures;
- All relevant EHS regulations will be complied with and permits, licences and consents will be obtained in a timely manner;
- The Safe and Sustainable Operations Policy and EHS goals will be communicated to Project personnel and all contractors to ensure they understand their EHS responsibilities and accountabilities and that they demonstrate visible EHS leadership;
- Appropriately consult and inform statutory and non-statutory groups and individuals;
- Identify, understand and manage all hazards and risks to personnel, the environment and assets to ALARP levels;
- Ensure that Contractors exhibit the required behaviors such that their work is carried out safely and without risks to health or the environment;
- Contractors and key suppliers will be required to have acceptable project specific EHS plans and management systems in place prior to commencing work;
- Build a positive behaviour-based EHS culture that focuses on open reporting, positive feedback, values learning and the prevention of incidents;
- No unplanned discharges and emissions to the environment;
- Minimise planned discharges and emissions through all phases of the project;
- All solid wastes to be disposed of in an approved and auditable manner;
- All commitments made in the Environmental Statement/Regulatory notifications will be met.

In complying with these objectives the Project's intention is to challenge the Contractors to strive for high levels of inherent safety and environmental performance. An 'EHS by Design' principle shall be applied throughout the project using the following risk reduction hierarchy:

- Remove the risk (e.g. through design, use differing (non-hazardous) materials, etc.);
- Reduce the risk through an engineering solution;
- Reduce risks through procedural control (including training and competency arrangements);
- Recommend personal protective equipment solutions.

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3.5. Key Performance Indicators (KPIs)

To verify that the above objectives are met, EHS performance will be monitored against selected Key Performance Indicators (KPI's) (Table 4-2).

Table 4-2 EHS Key Performance Indicators

KPI	Definition	Target
LTI (Includes fatalities)	Lost time incidents that involve a person being unfit to perform any work on any day after the occurrence of the injury or occupational illness. 'Any day' includes rest days, weekend days, leave days, public holidays or days after ceasing employment.	0
Recordable Incidents	This includes all types of injury listed in Appendix 2 of the Tullow Incident Management Reporting Procedure (T-EHS-PRO-008).	0
Spills	An uncontrolled release of a pollutant.	<ul style="list-style-type: none"> No spills > Level 1 on harm index No spills > 150 litres
Loss of Process Containment (LOPC)	Defined in the OGP Process safety Guidance document: www.ogp.org.uk/pubs/456.pdf	<ul style="list-style-type: none"> 0 – Tier 1 incident 0 – Tier 2 incident
Fines	Financial penalties imposed by Regulators	<ul style="list-style-type: none"> No fines