



**OSPAR PUBLIC STATEMENT 2021**



**APR\_CORP\_SHE\_050 Rev: 1  
May 2022**

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**APR\_CORP\_SHE\_050\_Rev 1**  
**AMENDMENT AND APPROVALS RECORD**

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**SIGN OFF RECORD**

|                       | Title                   | Name           | Signature  | Date         |
|-----------------------|-------------------------|----------------|--|--------------|
| Originator            | SHE Manager             | Andrew Mann    |  | May 26, 2022 |
| Reviewer and Approver | Chief Operating Officer | Graham Walters |  | May 26, 2022 |

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## ABBREVIATIONS

|        |  |
|--------|--|
| BEIS   | Department for Business, Energy and Industrial Strategy              |
| BOSIET | Basic Offshore Induction and Emergency Training                      |
| CA     | Comparative Assessment   |
| CCS    | Carbon Capture and Storage   |
| CMAPP  | Corporate Major Accident Prevention document                         |
| DP     | Decommissioning Plan   |
| EA     | Environmental Assessment   |
| EMS    | Environmental Management System                                      |
| FOET   | Further Offshore Emergency Training                                  |
| HCS    | Hydrocarbon Safe   |
| HSE    | Health and Safety Executive  |
| MAE    | Major Accident Event   |
| MAH    | Major Accident Hazard  |
| NSTA   | North Sea Transition Authority (formally Oil and Gas Authority, OGA) |
| NUI    | Normally Unattended Installation                                     |
| ODEAM  | Offshore Design Engineering Asset Management                         |
| OEUK   | Offshore Energies UK   |
| OGA    | Oil and Gas Authority (now NSTA)                                     |
| OPEP   | Oil Pollution Emergency Plan   |
| OPRED  | Offshore Petroleum Regulator for Environment and Decommissioning     |
| OSPAR  | Oslo Paris Commission  |
| P&A    | Plug and Abandon   |
| PLANC  | Permits, Licences, Authorisations, Notifications and Consents        |
| ROV    | Remotely Operable Vehicle  |
| SCAP   | Supply chain Action Plan   |
| SDV    | Shutdown Valve   |
| SECE   | Safety and Environment Critical Element                              |
| SEMS   | Safety and Environmental Management System                           |
| SHE    | Safety, Health and Environment                                       |
| SSSV   | Subsurface Safety Valve  |
| UKCS   | United Kingdom Continental Shelf                                     |
| WES    | Well Examination Scheme  |
| WIMS   | Well Integrity Management Scheme                                     |

## 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 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.

The Public Statement is intended to:

- Describe the scope of the company's offshore activities;
- Provide a description of the Alpha Petroleum Resources Limited Safety and Environmental Management System (SEMS);
- State the company's environmental policy, goals, objectives and targets for 2022; and,
- Provide a performance summary for 2021.

## 2 EXECUTIVE SUMMARY

This document reports on the environmental performance of Alpha Petroleum Resources Limited's (hereinafter referred to as Alpha Petroleum) UK Continental Shelf (UKCS) operated offshore activities during 2021.

The Statement is focused on environmental issues associated with operations that were directly under the control of Alpha Petroleum. It does not include discharges and emissions at host facilities operated by Perenco UK Limited (Perenco) or from facilities which are operated under environmental consents held by the Installation Operator, ODE Asset Management (ODEAM); these discharges and emissions are included within the relevant company's Public Statement.

The changing economic conditions throughout the year influenced decommissioning planning, as did host Operator planning and projects. Parallel workstreams within Alpha Petroleum therefore planned for potential re-purposing, continued operations and decommissioning of the assets. Alpha also managed a successful transition from Perenco UK to ODEAM as platform and pipeline Operator of the Tors and Wenlock assets.

Alpha met all of its statutory and regulatory obligations during 2021 and, with one exception, also achieved all its performance goals and objectives; Cheviot project sanction did not take place and therefore environmental performance targets and planning for the project remained on hold.

The Alpha Safety and Environmental Management System (SEMS) was independently audited and recertified against ISO 14001:2015 by Intertek.

## 3 ALPHA PETROLEUM RESOURCES LIMITED

### 3.1 The Company

Alpha Petroleum is a privately owned UK upstream oil and gas company, headquartered in Guildford and focused on operated, development and production activities in the North Sea. Further information on the company is available at [www.alphapetroleum.com](http://www.alphapetroleum.com).

Alpha Petroleum is Licensee, Field Operator and Well Operator for a number of small southern North Sea (SNS) gas basin developments (Figure 1). To date, these include

one single well subsea completion (Helvellyn) and three small Normally Unattended Installations (NUIs); Kilmar, Garrow and Wenlock, all of which are tied back to platforms and gas trunklines operated by Perenco.

During 2021, Alpha Petroleum was also Licensee of the Blocks that contain the Cheviot Field Development area (including the Cheviot and Peel reservoirs) in the northern North Sea.

Table 1 shows the Alpha Petroleum licenses that were held in the UKCS during 2021.

**Table 1 – Alpha Petroleum Licences held in the UKCS during 2021**

| Block                        | Interest | Licence | Field     | UKCS Region        |
|------------------------------|----------|---------|-----------|--------------------|
| 47/10a                       | 100%     | P001    | Helvellyn | Southern North Sea |
| 43/22                        | 17%      | P683    | Kilmar    | Southern North Sea |
| 42/25a, 43/21a               | 17%      | P1034   | Garrow    | Southern North Sea |
| 49/12aN,<br>4912b            | 20%      | P033    | Wenlock   | Southern North Sea |
| 2/10b, 2/15a,<br>3/6a, 3/11b | 100%     | P1070   | Cheviot   | Northern North Sea |

### 3.2 The Assets

#### 3.2.1 Helvellyn

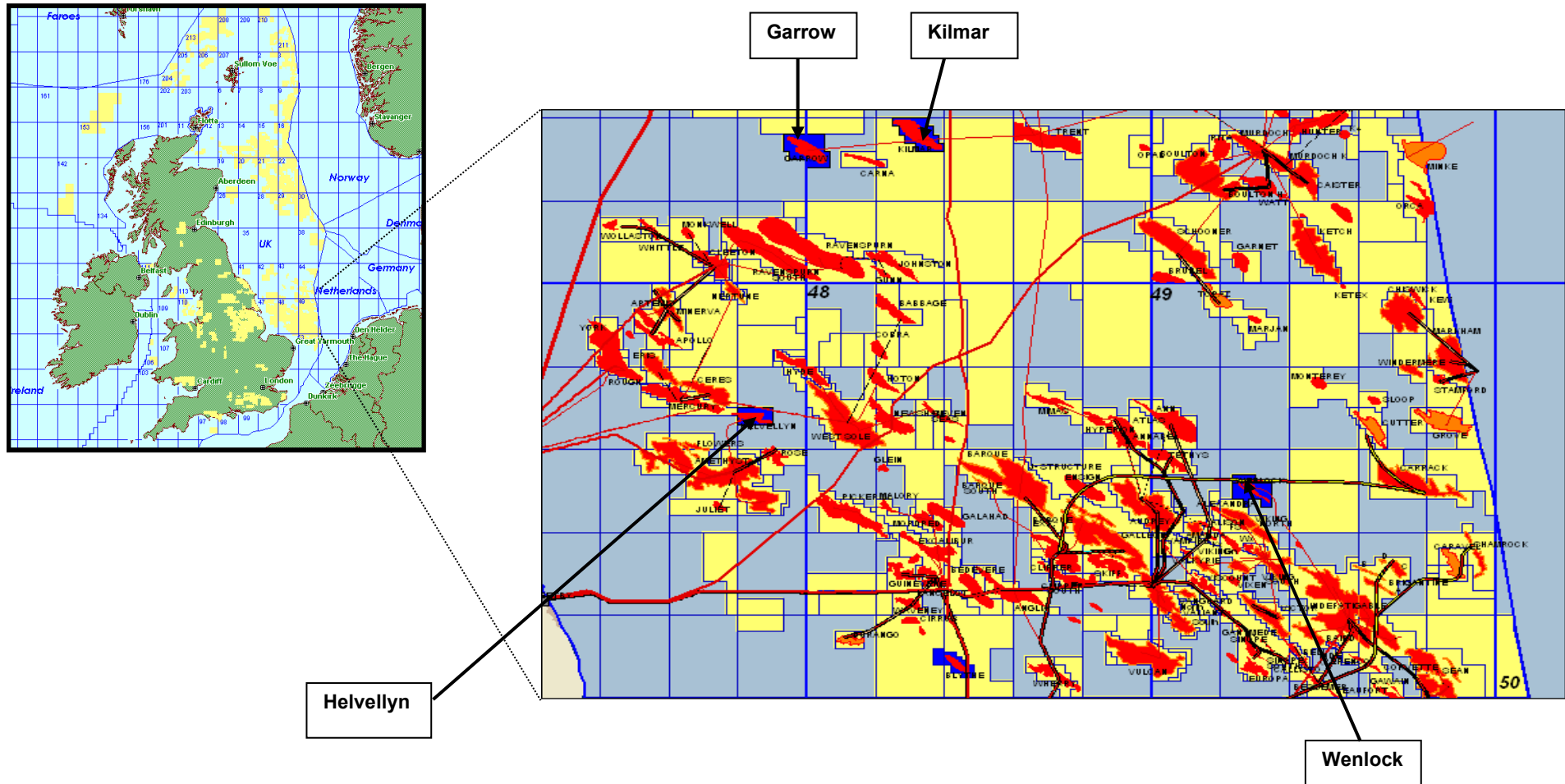
Helvellyn is a gas field located in approximately 30m water depth in UKCS block 47/10 for which Alpha Petroleum is the Field Operator and Well Operator.

The Helvellyn Development comprises a single subsea well tied back to the Perenco operated Amethyst A2D platform via a 15.4km 8-inch pipeline. The well is controlled and monitored from the control room at the Perenco operated Bacton Gas Terminal.

Helvellyn ceased production in 2017 when the host platform shut down and it has remained shut in since this time. Perenco intends to decommission the entire Amethyst field, completing A2D platform during 2022.

Helvellyn hydraulic control lines have been disconnected at A2D so that well valves cannot be inadvertently functioned. Control signals remain connected so that valve positions, pressures and temperature may be monitored remotely. The Helvellyn pipeline remains shut in at Helvellyn and A2D.

Figure 1 – Location of Alpha Petroleum Assets



### 3.2.2 Tors Field

The Tors development consists of two gas fields: Kilmar in Block 43/22a under Licence P683 and Garrow in Blocks 42/25a and 43/21a under Licence P1034. Each field was developed with a single NUI.

Ownership of the fields is divided among three partners:

|  |     |
|--|-----|
| Alpha Petroleum (Field Operator) ..... | 17% |
| Energiean plc.....                     | 68% |
| Rockrose .....                         | 15% |

The Kilmar platform was installed in 2005, has three platform wells and achieved first gas production in 2006. The Garrow platform was installed in July 2006, has two platform wells and achieved first gas production in 2007.

Both the Garrow and Kilmar platforms and pipelines are operated and maintained by ODEAM as Platform and Pipeline Operator. APRL is the Well Operator for the Tors fields.

Production from both Garrow and Kilmar platforms ceased in 2020 due to closure of the export route through the Perenco operated Trent platform. Both Garrow and Kilmar were subsequently placed into Hydrocarbon Safe (HCS) status after production ceased.

HCS means that:

- The platform wells are shut in by closure of all tree valves. Hydraulic services to actuated tree valves are isolated and disconnected.
- Each subsurface safety valve (SSSV) is closed and its hydraulic control line is disconnected and isolated.
- Each well is isolated from its respective flowline by means of a blind inserted at the first hubbed connection downstream from the tree.
- The gas export and chemical import pipelines are depressurised and isolated from the topsides by closed riser emergency shutdown valves (SDVs).

Whilst not in production, each platform remains shut in and fully maintained in accordance with latest Safety Case, which was accepted by HSE in October 2021 prior to the transition of Operatorship to ODEAM.

### 3.2.3 Tors – Kilmar

A significant unproduced volume of gas remains in the Kilmar field but has no current export route due to the shutdown of Trent. The increase in wholesale gas price during 2021 has strengthened the economic case for recovery of these reserves.

Alpha and its partners will therefore continue efforts to resume production from the field. This may be through reinstatement of the Trent platform and pipelines (see Section 5.3) or via a new export route to a new host.

### 3.2.4 Tors – Garrow

Garrow wells are largely depleted and for this reason it was not planned to extend the production licence beyond its expiry date in February 2022. The base case for Garrow is that P&A of the wells will be completed late in 2023. However, if the export route from Tors were to be re-established, the Garrow platform could potentially remain in service as part of this pipeline system.



### 3.2.5 Wenlock

Wenlock lies in licence block 49/12A and comprises a single gas field which was first discovered in 1974.

Ownership of the field is divided between two partners:

|  |     |
|--|-----|
| Alpha Petroleum Resources Limited (APRL, Field Operator) ..... | 20% |
| Energiean UK Limited .....                                     | 80% |

A single NUI was installed on Wenlock in 2006 and supports three wells which came into production in 2007, 2008 and 2009 respectively.

The platform is connected to the Perenco UK (PUK) operated Indefatigable (Inde) 49/23AC (23A) platform by two 37km pipelines; an 8-inch gas export pipeline and a piggybacked 3-inch chemical (MEG) import pipeline.

Wenlock is currently in production with all three wells in cyclic operation to manage liquid loading. However, Perenco is planning to cease production and commence decommissioning of Inde 23AC during 2022, at which point Wenlock will also cease production.

Following CoP, the pipeline will be flushed with seawater pumped from Inde 23AC and the flushing liquids will be disposed of down one or more of the Wenlock wells.

The Wenlock platform topsides pipework will then be depressurised, the wells isolated, and the platform put into Hydrocarbon Safe (HCS) status by ODEAM. The current plan is to P&A the Wenlock wells in rig-based campaign late in 2023.

### 3.2.6 Cheviot

Cheviot is an oil accumulation in Block: 2/10b, 2/15a, 3/6a & 3/11b and is a development project of what was originally the Emerald field, discovered in 1975. Equity in the licence is wholly assigned to Alpha Petroleum. It is planned to develop the field with a number of subsea wells tied back through flexible risers to a Floating Production and Storage Unit (FPSO).

During 2020 the Cheviot project was mature into the development phase with a number of contracts in place and an approved Field Development Plan (FDP). The project was suspended during the spring of 2020 when the onset of the Covid pandemic and the ensuing reduction in commodity prices impacted on the partnering process to take the project forward.

The increase in the wholesale oil price during 2021 and longer-term forecasts have strengthened the economic case for the Cheviot project but it remained on hold throughout 2021 with all assigned contractors being kept informed.

## 4 ENVIRONMENTAL MANAGEMENT SYSTEM

Alpha Petroleum operates under an integrated Safety and Environmental Management System (SEMS) to enable the goals and aims of the Company's Safety, Health and Environmental (SH&E) Policy (Figure 2) to be achieved. It reflects the principles embodied in existing international and national models for safety and environmental management (e.g., ISO 14001, OHSAS 18001, HSG 65). Alpha Petroleum Senior Management is committed to incorporating the goals of the SH&E Policy into all Company activities: No accidents, no harm to people and no damage to the environment.

The scope of SEMS is the management of safety and environmental aspects related to Alpha Petroleum's position as Licensee, Field Operator and Well Operator in the upstream oil and gas industry.

When applied to Company operations and projects and within its defined context, the SEMS is designed to identify, control and manage S&E risks arising from business activities. These operations and hence the scope of SEMS covers:

1. Offshore operations associated with oil and gas appraisal, field development and production within the UK Continental Shelf (UKCS) for which Alpha Petroleum has S&E responsibilities; and,
2. Onshore business activities including planning and design phases for field development and production operations undertaken within offices for which Alpha Petroleum has S&E responsibilities, including the Guildford (head) office.

The SEMS provides a flexible management framework through which the Company can systematically identify and manage its safety and environmental risks and opportunities, accommodating individual operational complexities, changing legal and business requirements and the Company's commitment to continual improvement.

The key components of the SEMS are summarised in Figure 3 and key documents include:

1. The SH&E Policy;
2. The Corporate Major Accident Prevention policy (CMAPP);
3. The SEMS Framework document, which outlines SEMS elements and associated systems and documents;
4. SEMS Guidance documents, which describe how SEMS elements are applied;
5. Incident Management Plans, which detail the Company's response to and management of incidents and emergencies;
6. Oil Pollution Emergency Plans (OPEPs), which detail the Company response to pollution incidents; and,
7. SEMS Implementation and Supporting Documents, which comprise documents such as annual plans, studies, evaluations and audits.

As required by OSPAR Recommendation 2003/5, Alpha Petroleum's SEMS is independently verified and initial certification to ISO14001:2015 was completed in June 2018. The SEMS is subject to annual surveillance audits and a three-yearly recertification audit; the most recent of these was successfully completed in June 2021 and the SEMS recertified accordingly.

ODEAM is the Installation Operator and Pipeline Operator for all Alpha Petroleum operating assets; as such, operations on these assets are undertaken under the ODEAM SEMS. This has been reviewed by Alpha Petroleum and ODEAM has been approved by OGA, BEIS and the HSE as a competent Operator.

Alpha Petroleum is Well Operator for the wells within the SNS licences and the wells are included in the Alpha Petroleum Well Examination Scheme (WES) and managed by Alpha Petroleum's Well Integrity Management System (WIMS).

Alpha Petroleum has developed OPEPs to cover well pollution incidents for which the company takes primacy as Well Operator. These OPEPs are closely aligned with onshore and offshore OPEPs developed by ODEAM for the Alpha Petroleum platforms and pipelines which they manage as Platform and Pipeline Operator.

During production, ODEAM manages 'day-to-day' production control (through Perenco's Bacton control room), well operations, wellhead maintenance and annulus monitoring under contractual arrangements with Alpha Petroleum. These operations are therefore undertaken under the ODEAM SEMS and any variance from the pre-agreed working envelope is communicated to Alpha Petroleum.

Figure 2 – Alpha Petroleum SH&E Policy



## SAFETY, HEALTH AND ENVIRONMENTAL POLICY

Alpha Petroleum Resources Limited in its role as Licensee, Field Operator and Well Operator will conduct its business with a commitment to the safety and health of people the protection of the environment and the minimisation of greenhouse gases emissions. Our Goals are – No Accidents, No Harm to People and No Damage to the Environment.

To accomplish this we will:

- Communicate the importance of effective safety, health and environmental management as an integral part of our business which is recognised and endorsed at the highest levels.
- Design and manage all our activities to ensure that HSE risks are identified and managed so that they are as low as reasonably practicable.
- Comply as a minimum with laws, regulations and obligations governing safety and environmental protection and the standards set by industry organisations to which we subscribe.
- Ensure that all personnel and Contractors who work for us and on our behalf are aware of the Company's HSE goals and expectations and hold them accountable for their performance.
- Provide leadership, professional personnel and training to support this Policy.
- Monitor, evaluate and report safety and environmental performance and conduct internal audits.
- Participate in programmes and discussions with established Industry forums designed to improve technology, laws and regulations.
- Seek continual improvement in safety and environmental performance through management review and by setting appropriate objectives and targets consistent with the aims of this Policy.



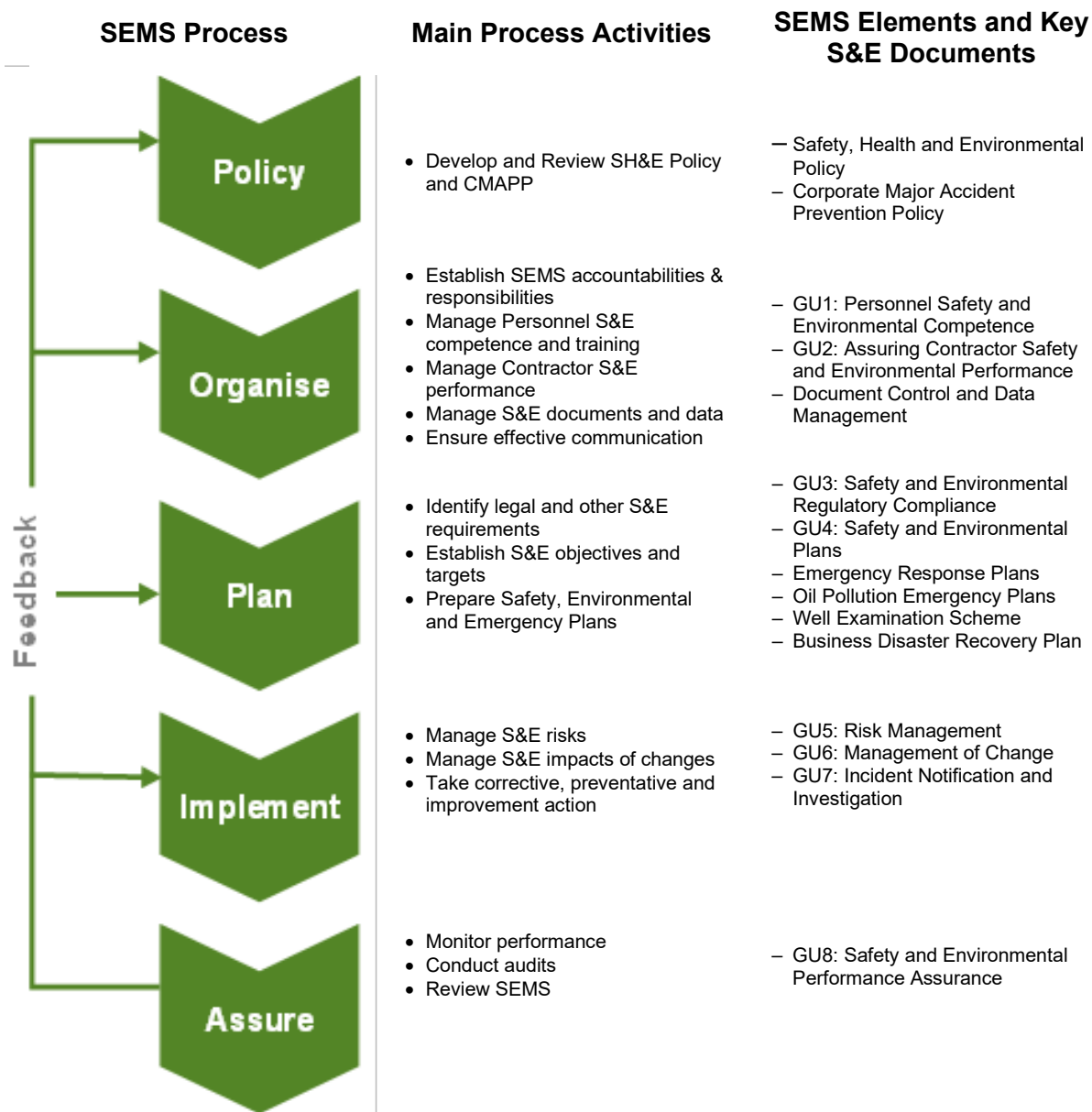
Date 10<sup>th</sup> May 2021

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Graham Walters  
Chief Operating Officer  
Alpha Petroleum Resources Limited

This Policy is available to interested parties on [www.alphapetroleum.com](http://www.alphapetroleum.com)

**Figure 3 – SEMS Framework**



## 5 2021 ENVIRONMENTAL PERFORMANCE

### 5.1 Overview of 2021 Activities

#### 5.1.1 General

The COVID pandemic continued to impact Alpha Petroleum offshore operations through 2021, though to a lesser extent than during 2020. Moreover, the changing economics of gas production in the latter half of the year challenged earlier decisions by all operators on the timing of decommissioning.

Alpha Petroleum performed no well operations during 2021, there was no production from Tors or Helvellyn fields and no offshore activities in the Cheviot Field. Of the SNS assets only the Wenlock platform remained in production. This is also expected to cease in 2022 when its host facility, Perenco's Inde 49/23A-AC, also ceases production.

Safety and environmental management activities within the year were primarily focused on the transition of Operator and Duty Holder from Perenco to ODEAM, the changing operating status of the SNS assets and their progress towards decommissioning, re-purposing or continued operation.

#### 5.1.2 Operator Transition

Following the Perenco decision in 2020 to discontinue as Platform and Pipeline Operator for the Alpha SNS assets, Alpha conducted a thorough tendering process which culminated in the selection of ODEAM as Installation and Pipeline Operator for the Tors and Wenlock assets.

A transition process was undertaken, driven by a detailed PLANC management system, to ensure no aspect of the change of Duty Holder and Operator was overlooked, whether regulatory or operational. New Safety Cases and OPEPs were developed for the assets by ODEAM and a new OPEP for the Wenlock and Tors wells was developed by Alpha. The Alpha Well Integrity Management System (WIMS) was reviewed and updated where necessary and well handover documentation from Perenco reviewed.

The Transition process completed successfully on 8<sup>th</sup> October and the Offshore Major Accident Regulator (OMAR) formally accepted the change of Duty Holder, platform and pipeline Operator.

#### 5.1.3 Helvellyn

The field remained shut in throughout 2021 and Alpha continued to monitor the Helvellyn well, with relevant data reported by Perenco Bacton control room. The transition of Operatorship to ODEAM did not include the Helvellyn pipeline, which remains with Perenco, while Alpha remains the Well Operator.

A visual survey of the wellhead and pipeline route by ROV was arranged but due to weather delays did not take place until early in 2022 (with satisfactory results).

With no plans to resume production from Helvellyn, and decommissioning plans for the host platform at an advanced stage, Alpha continued to plan for flushing of the pipeline and disconnection from Amethyst in 2022.

It is planned to flush, flood and isolate the Helvellyn pipeline in preparation for cutting the pipeline and removing the A2D platform. The pipeline will be flushed with seawater from A2D to Helvellyn and the flushing fluids will be disposed of into the well. The pipeline will be left clean and flooded with seawater at ambient pressure and all well valves will be closed. A plug will then be set in the pipeline at A2D enabling the

pipeline to be cut. The umbilical will also be flushed in the same manner and the cores plugged at A2D.

Alpha Petroleum plans to plug and abandon (P&A) the Helvellyn well late in 2023.

#### 5.1.4 Tors – Garrow

Garrow remained shut in and isolated throughout 2021. A new platform Safety Case was developed by ODEAM and accepted by HSE immediately prior to transition of Operator.

ODEAM offshore personnel joined Perenco intervention teams visiting Garrow prior to transition for platform familiarisation. Key information on system status, including existing process isolations, was exchanged and reviewed. Following transition, a program of visits was undertaken for essential maintenance, the priorities being SECEs and the reliability of power generation (to minimise ad-hoc visits and ensure reliable operation of nav aids). These activities were ongoing at the end of 2021.

Alpha continued to plan towards pipeline flushing in 2022 and Garrow well P&A late in 2023. Alpha also drafted the CoP document, prepared the Standard Economic Template and drafted the Supply Chain Action Plan (SCAP) supporting this process.

During 2021 Garrow was identified as a potential candidate platform for use in a Carbon Capture and Storage (CCS) project. Alpha provided subsea and subsurface data to the project partners to explore this re-use option for the Garrow infrastructure, which was ongoing at the end of the year.

#### 5.1.5 Tors – Kilmar

Like Garrow, Kilmar also remained shut in and isolated throughout 2021, operating under a new platform Safety Case following transition of Operator. Interventions were likewise scheduled to address SECE priorities and power generation reliability.

As noted in Section 3.2.3, significant reserves remain in the Kilmar reservoir and Alpha continued to seek an export route, either through the reinstatement and extended operation of Trent, or via another host (See Section 5.3).

#### 5.1.6 Wenlock

Wenlock remained in production throughout 2021, other than when constrained by planned shutdowns by the host operator platform and export system. Interventions to the platform took place with the same priorities as those at Kilmar and Garrow, i.e., SECE maintenance and power generation reliability. These visits were generally integrated with those to Tors to maximise efficiency.

Wenlock was identified as a candidate platform for use as a nesting site for seabirds to offset the impact of planned and existing nearby windfarm turbines on local seabird populations. Alpha has therefore engaged with the wind farm operators to explore how this repurposing might be achieved and these discussions were ongoing at the end of 2021

Alpha nevertheless continued to plan for Wenlock CoP in 2022, the exact timing to be determined by the shutdown of the host facility, with well P&A scheduled late in 2023. The Wenlock CoP document was approved by NSTA (then OGA) and OPRED accepted the Decommissioning Program (DP), Environmental Appraisal (EA) and Comparative Assessment (CA) reports. Work also commenced with ODEAM and Perenco to draft flushing procedures for the Wenlock pipelines.

### 5.1.7 Cheviot

The development of Cheviot was put on hold in 2020, largely due to the negative impact of the Covid pandemic on commodity prices. A four-year licence extension was obtained from OGA for this reason. While the economic landscape improved during the latter half of 2021, the project remained on hold. It nevertheless remains Alpha's intention to progress the Cheviot development further within the current licence period.

## 5.2 2021 Environmental Aspects Register

Key environmental risks are identified, assessed and documented in an annual Environmental Aspects Register.

Planned activities and potential unplanned events (e.g., accidental releases) associated with the proposed operations were risk assessed against seven environmental elements based on the main types of potential environmental impact for oil and gas activities. These are:

1. Physical Presence;
2. Seabed Disturbance;
3. Noise and Visual Impacts.
4. Atmospheric Emissions;
5. Marine Discharges;
6. Solid Wastes;
7. Resource Usage.

A total of 20 environmental aspects affecting 67 receptors were identified and assessed. All aspects were assessed as Not Significant (negligible and low environmental risk). No Significant or Highly Significant environmental risks were identified. Aspects with low residual risk were again considered when identifying annual objectives and targets. As there have been no new developments or changed activities on any of the Alpha offshore assets, these findings remain substantially unchanged from 2020.

All regulated aspects were appropriately monitored. In addition, risk reduction and mitigation measures were put in place to control and mitigate environmental risks and maintain a high standard of environmental management. These included:

- Continued compliance, monitoring and reporting in accordance with all environmental permits, consents and other regulatory requirements;
- Continued liaison with environmental regulators and stakeholders;
- Assessment of and coordination with the designated Operator (Perenco through 8<sup>th</sup> October 2021, ODEAM thereafter);
- Continued inspection and maintenance of all offshore facilities by the designated Operator;
- Installation specific emergency and incident response plans in place;
- Oil Pollution Emergency Plans in place;
- Well Integrity Management Systems in place;
- Well Examination Scheme in place;
- All diesel and chemical bunkering operations to NUIs undertaken in daylight and in good weather conditions (i.e., when manned);



- Annual monitoring of chemical use to optimise use; and,
- Ship Oil Pollution Emergency Plans in place (all support vessels).

With these controls in place all environmental aspects, including legislatively controlled aspects, were appropriately monitored and managed.

Contractor Management has the potential to impact on the environment through unplanned or poorly planned releases to the environment. This is managed through the Company SEMS, specifically SEMS Guidance GU2: *Assuring Contractor S&E Performance*.

### 5.3 Performance Against 2021 Environmental Objectives

Given that Alpha Petroleum's operations are largely consent-driven, good environmental compliance and performance is largely a matter of ensuring that the Company, its appointed Installation Operator, ODEAM, and appointed contractors obtain and maintain all appropriate environmental permits and consents. Licences and Consents for the field, rather than the asset, are managed directly by Alpha. A series of environmental objectives were set and included in the annual Safety and Environmental Plan. These were set within the context of:

- Past performance;
- Assessment of risks associated with planned activities, as summarised in the Environmental Aspects Register;
- Compliance with existing and future legislation, permits and consents;
- Meeting the commitments made in the Alpha Petroleum SH&E and CMAPP Policies.

For 2021 the following environmental objectives were set and their status at the end of 2021 is noted in red:

- Complete the Tors and Wenlock transition to ODEAM.

**Completed.**

The safety cases for Tors and Wenlock were accepted by HSE on 7<sup>th</sup> October 2021 and the new OPEPs covering the platforms and pipelines were approved by BEIS the following day. Alpha Petroleum formally notified HSE and OPRED of the Change of Duty holder from Perenco UK Limited to ODE Asset Management Limited, effective from 6.00pm on 8<sup>th</sup> October 2021.

- Tors workstreams will concentrate on the re-development. Initially with a desk top study with regards to reprocessing of the existing seismic data and engagement with 3<sup>rd</sup> party infrastructure owners to assess re-routing options. There will be engineering studies and once a 'host' has been identified potentially an export route survey later in 2021.

**Partly completed.**

Whilst seismic reprocessing would provide greater insight, particularly into Kilmar reserves, Alpha had not secured partner agreement to undertake this work by the end of 2021. Alpha continues to seek agreement to progress the scope.

At the same time, improving production economics combined with uncertainty over the timing of Trent decommissioning led to initial discussions between Alpha Petroleum and Perenco on future plans for the Trent facility. Subject to suitable commercial arrangements and technical due diligence, it might be possible to resume Trent operations and continue operation beyond the

planned decommissioning date, thereby maintaining the existing export route for Kilmar. These discussions were ongoing at the end of 2021.

Alpha will continue to explore options for an alternative export route for Tors production if the reinstatement of Trent is not deemed technically or commercially viable.

- Wenlock will produce for as long as possible and then will be shut in.

Completed.

Wenlock remained in production throughout 2021, other than during planned shutdowns of the host platform and onshore reception facility. Additionally, in compliance with the newly developed Wenlock Safety Case, emergency response considerations now require Wenlock production to be shut in whenever the platform is manned.

- Cheviot workstream will primarily revolve around the partner process which is due to complete in Q3. All other activities will be desk based with no environmental activities planned;

Not completed.

Alpha continues to work towards Cheviot project sanction but it was not possible to achieve this during 2021.

- Ensure full legislative and regulatory compliance;

Completed.

All Alpha's activities during 2021 continued to follow government guidance and comply fully with legislation.

- Continue the review, communication and internal audit of Alpha Petroleum's SEMS to ensure a suitable and robust system is in place to manage Company operations in accordance with Company policies and statutory regulations;

Completed.

The Alpha SEMS continues to provide an effective means of managing the safety and environmental aspects of the company's business. An annual Management Review was completed in November 2021. The SEMS is subject to annual independent audit and a full recertification audit every three years, the latter completed by Intertek in May and June 2021 with satisfactory results.

- Review Alpha QHSE and CMAPP Policies and ensure audit planning reflects and supports the changes in operatorship and project planning that occurred during 2020;

Completed.

The SEMS Policy was updated and published in May 2021. The CMAPP was last updated for Cheviot and was discussed in the annual Management Review in November 2021. Following review, the CMAPP was updated to specifically cover the well operations for which Alpha Petroleum has responsibility as Well Operator, rather than platform and pipeline major accident hazards (MAHs) which are the responsibility of the pipeline and platform Operator.

- Ensure the smooth transition of Perenco to ODEAM as Installation and Pipeline Operator of Alpha's SNS assets;

Completed.

As noted above, the transition of Operatorship for Alpha Petroleum's Tors and Wenlock facilities was concluded satisfactorily on 8<sup>th</sup> October 2021, managed

and controlled a comprehensive PLANC process. Alpha has continued to work closely with ODEAM since transition to ensure the safe and efficient management of the platforms and pipelines and the integration of incident and emergency response planning.

- Ensure interfaces are identified and managed between Alpha Petroleum, ODEAM and Perenco;

Completed.

As part of the transition of Operatorship, an Interface Document was developed to describe and manage the interfaces between Alpha Petroleum, as Field and Well Operator, ODEAM, as Platform and Pipeline Operator, and Perenco, as host facility Operator and responsible for day-to-day production control (remote from Bacton). The document covers all relevant technical, operational, safety and environmental interfaces between the three parties.

- Continue to monitor, review and audit the ODEAM SEMS performance following transfer of Installation and Pipeline operatorship;

Completed.

Alpha performed and participated in audits and readiness reviews as part of the transition process. The transition to ODEAM was completed later in the year than planned (October instead of June) and further audits were therefore scheduled for 2022, when the interface arrangements have been tested and refined.

- Further development and implementation of Alpha Petroleum's Well Integrity Management System (WIMS), as part of the transfer of operatorship from Perenco to ODEAM.

Completed.

A general revision of the Alpha Well Integrity Standard was completed and the document submitted to the Well Examiner for review. A detailed review of the status of each of the platform wells was undertaken with Perenco and all wells formally handed over to Alpha as Well Operator. In a further technical handover process, day to day management and maintenance of the wells was assigned to ODEAM as Duty Holder and platform Operator.

- Ensure a suitable Well Examination Scheme remains in place for any well operations;

Completed.

The Well Examination Scheme continued through 2021 by independent Well Examiner CDIL, whose annual well integrity review for the year was issued in February 2022. The review covered all existing operational and suspended wells; no new drilling or well re-entry work was undertaken.

- Ensure a thorough identification of Company environmental risks and opportunities and the needs and obligations associated with stakeholders;

Completed.

An assessment of Strengths, Weaknesses, Threats and Opportunities (SWOT) was conducted as part of the annual Management Review of the Alpha SEMS in November 2021.

- Undertake an independent Recertification audit of the Alpha Petroleum SEMS to meet ISO 14001:2015 requirements;

Completed.

The 3-yearly recertification audit was conducted by Intertek on 9<sup>th</sup> and 10<sup>th</sup> June 2021 and the certificate validity extended for three years from 21<sup>st</sup> June 2021.

- Continue consultation with OGA, OPRED and other statutory bodies on SNS Cessation of Production and decommissioning planning for identified assets;

Completed.

Liaison with statutory bodies on CoP and decommissioning planning continued through the year (see Section 5.1.6 for details).

- Ensure appropriate communications are held with regulators and environmental stakeholders for the Cheviot field development and any well operations on the SNS wells;

Completed.

As noted above, no further progress on the development of Cheviot has been possible. No well intervention operations have been performed on any existing assets and, in the case of Helvellyn and Tors, all wells have remained shut in throughout 2021.

- Ensure all necessary submissions are made to regulators to support the environmental consenting process for any well operations on the SNS wells.

Completed.

No well interventions were planned or performed in 2021 and no environmental submissions were made.

- Undertake S&E monitoring and management of contractors;

Completed.

Alpha continued to monitor the SHE performance of its main contractors, the Duty Holders and Operators of the Alpha Petroleum platforms and pipelines, with the emphasis on the incoming Duty Holder ODEAM as part of the transition process.

- Schedule and ensure identified personnel undertake appropriate SHE training;

Completed.

A training schedule is maintained for all Alpha personnel. As there were no drilling or well intervention activities in 2021, there was no requirement for any offshore visits by Alpha personnel during 2021. Likewise, there was no requirement to undertake or update any individual offshore safety training (BOSIET, FOET, etc.,) within the year.

Scheduled three yearly BEIS Level 2 OPEP training was planned for various management and staff and will take place early in 2022.

- Ensure environmental risk assessments are completed for all major activities;

Completed.

Risk assessments were completed as part of the development of OPEPs for the Alpha platforms and pipelines and wells. Operational risk assessments were carried out routinely where any deficiencies or impairments were noted to SECEs on the Tors and Wenlock platforms.

- Ensure any environmental incidents are investigated and followed through to closure.

N/A.

**There were no environmental incidents during the year.**

All applicable environmental objectives were met although many objectives continue through into the 2022 S&E Plan.

#### **5.4 2021 Environmental Performance Summary**

This Section provides a summary of performance in relation to compliance with relevant legislation. The extent to which the 2021 environmental goals and objectives of the Alpha SEMS policy were achieved is discussed in Section 5.3 above.

##### **5.4.1 Production Operations**

Production operations during 2021 were undertaken at Wenlock only. There was no production from the Tors or Helvellyn fields.

All platforms were visited through the year for essential maintenance and continued to be managed and operated under their respective Safety Cases. Visits were completed by Perenco intervention teams and subsequently by ODEAM (as the Duty Holder and Operatorship was transitioned).

A total of 29 day visits were made to Tors (14 and 15 to Garrow and Kilmar respectively) and 35 day visits to Wenlock through the year. These numbers are slightly higher than 2020, when visits were reduced due to the impact of the pandemic but are in line with the visit frequency of previous years.

##### **5.4.2 PON1 Incidents**

There were no PON1 incidents during 2021.

##### **5.4.3 Chemical Use and Discharge**

During 2021 there was no chemical use at, or discharge from, any of the SNS assets.

##### **5.4.4 Venting**

Consents were obtained for essential, safety-related well maintenance venting of hydrocarbon gas on Wenlock, Garrow and Kilmar during 2022. There was no routine venting other than for this purpose in 2021. Quantities vented during 2021 were 0.9t for Wenlock and zero for each of Garrow and Kilmar.

##### **5.4.5 Emissions**

During 2021 approximately 39t of diesel fuel was consumed on Kilmar for power generation and approximately 31t on each of Garrow and Wenlock. The corresponding CO<sub>2</sub> emissions were approximately 126t for Kilmar and 101t for each of Garrow and Wenlock.

##### **5.4.6 Waste**

Waste quantities returned ashore from the three platforms were minimal and reported by the platform Operator.

## **6 2022 ENVIRONMENTAL OBJECTIVES**

### **2022 Activities:**

- Continue to explore options for an export route for Kilmar, either through reinstatement of Trent or via a new pipeline to another host platform.

- Continue to work with others towards Garrow re-purposing within the context of a CCS project.
- Obtain Consent to suspend the two Garrow wells, with valved isolation only, to allow the wells to be used for disposal of pipeline flushing fluids.
- Progress plans for Garrow pipeline cleaning and decommissioning, in the event that Garrow is not required as part of a new export route for Kilmar.
- In the event that a redevelopment of Kilmar does not encompass Garrow platform and pipelines, progress plans for pipeline cleaning, platform decommissioning planning.
- Continue to produce from Wenlock until the host platform is shut in for decommissioning and progress plans for pipeline cleaning and placing the platform in HCS status.
- Work with windfarm operators and NSTA to progress any opportunities to repurpose Wenlock post P&A.
- Continue with the partnering process for Cheviot and seek a firm commercial basis for project sanction.

Based on these activities, the Environmental objectives set by Alpha Petroleum for 2022 include:

- Ensure full legislative and regulatory compliance;
- Continue the review, communication and internal audit of Alpha Petroleum's SEMS to ensure a suitable and robust system remains in place to manage Company operations in accordance with Company policies and statutory regulations;
- Review the SHE Policy, CMAPP and the scope of the SEMS as part of the annual Management Review and ensure that the SEMS remains aligned with and applicable to the company's activities;
- Maintain ISO 14001:2015 accreditation and an awareness of the SEMS by all personnel;
- Participate (with ODEAM) in emergency response and OPEP exercises for Tors or Wenlock operations;
- Continue to monitor, audit and review ODEAM safety and environment performance as Installation and Pipeline Operator;
- Maintain the S&E Plan to set Company objectives and targets;
- Conduct safety and environmental risk assessments for all planned operations and, where applicable, ensure that risk assessments are carried out by contractors and third parties.
- Continue consultation with OMAR (HSE, BEIS and OPRED), NSTA and OEUK and other statutory and industry bodies on SNS Cessation of Production and decommissioning planning for identified assets;
- Ensure a suitable Well Examination Scheme remains in place for any well operations;
- Ensure all necessary submissions are made to regulators to support the environmental consenting process for any well operations on the SNS wells.
- Schedule and ensure identified personnel undertake appropriate SHE training;

- Ensure any environmental incidents are investigated and followed through to closure.









# APR\_CORP\_SHE\_050 Rev 1 OSPAR Public Statement May 2022

Final Audit Report

2022-05-26

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