

**Fraser**  
Well Management

**ENVIRONMENTAL REPORT**  
**2021**

Name	Job Title	Date	Signature
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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 2021.

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.

The report also does not include any discharges or emissions associated with operations which were directly under the control of Fraser Integrity Management as Pipeline Operator, with company responsibility for these activities formally commencing in 2022.

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 2021.



## 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, well maintenance and pipeline integrity management through to abandonment – both onshore and offshore. With strong engineering and supervisory expertise and an extensive track record of high-quality results, FWM provides a comprehensive package of well management services, including well engineering, project management, well and pipeline 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 to reach this goal.

The head office of FWM is located at:

Fraser Well Management

Beacon Innovation Centre

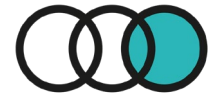
Beacon Park

Gorleston

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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 2021.

### 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) which meets the requirements of ISO 45001 & ISO 14001.

### 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)
- SEMS Description
- Health & Safety and Environmental Manual & 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 (RPT 26, 2021, 17:00 GMT+0)

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 at annual policy review and bi-monthly HSE review meetings, as well as 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 integrated 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 2021.

For 2022 this certification and evaluation will also include Pipeline Operatorship & integrity arrangements.

### **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 such as strong environmental governance, 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. 2021 ENVIRONMENTAL OBJECTIVES

The FWM environmental management objectives for 2021 were established to achieve the progressive commitments set out in our Environmental Policy Statement. During the year these objectives were subject to further review and support by both management and environmental committee personnel, with the 2021 Environmental Objectives broadly achieved. The methodology is described in 3.6 above and continues to be applied to 2022 objectives.

2021 objectives:

- 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 2021
- 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





## 5. 2021 ENVIRONMENTAL PERFORMANCE

### 5.1. Overview of 2021 Activities

This section provides a summary of our 2021 performance. A summary of offshore environmental aspects and their associated emissions and impacts is also provided.

#### 5.1.1. 2021 Performance Summary

Progress against our Objectives and Targets was subject to annual management review. All 2021 Objectives and Targets listed in Section 4.0 were met with no non-compliances or spills incurred.

### 5.2. Production Well Operator Activities

During 2021 FWM (as Well Operator) continued to work closely with the asset Duty Holder (ODE) and Licensee (NEO Energy) in support of the Babbage Installation and Operations activities.

The company also continued, as Well Operator, to work alongside NEO Energy (Licensee) for the Victoria subsea well, and Bridge Petroleum (Licensee) for the Darwin subsea well.

As part of asset onboarding and continued safe operations, active risk and integrity management, safety management interface and emergency response arrangements are in place and continue to be assessed as part of FWM management system interfacing, response arrangements and readiness.

A summary of assets, responsibility and OPEP arrangements for 2021 are defined in Table 1 below.

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

**Table 1 – Well Operator Activities (2021)**

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 in 2021. 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 2021.

## **5.2.2. Atmospheric Emissions**

Nothing to report in 2021.

## **5.2.3. Non-Compliances or Discharges (Spills)**

Nothing to report in 2021.

## **5.3. Drilling Activities**

In 2021 no drilling was undertaken in the UKCS by FWM as Well Operator.

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 2021.

#### **Drilled Cuttings**

Nothing to report in 2021.

### **5.3.2. Atmospheric Emissions**

Nothing to report in 2021.

### **5.3.3. Non-Compliances or Discharges (Spills)**

Nothing to report in 2021.



## 6. 2022 ENVIRONMENTAL OBJECTIVES

Key Environmental Objectives that have been set by FWM for 2022 are as follows:

- 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 (WES) and Well Integrity (WIMS) Monitoring programme remains in place for all well operations
- Ensure a robust Pipeline Integrity Monitoring Scheme (PIMS) is in place for pipeline operations
- Ensure proactive communications are held with regulators and environmental stake holders prior to mobilisation of future campaigns
- Hold annual FWM update and engagement with Regulatory Authorities (BEIS)
- Ensure environmental impact risk assessments are completed for all new major projects or activities
- Ensure all necessary submissions are made to regulators to support the environmental consenting process for any well or pipeline operations, transitions or appointments
- Review and update the FWM Environmental aspects and impacts register
- Calculate and report baseline company emissions for 2022

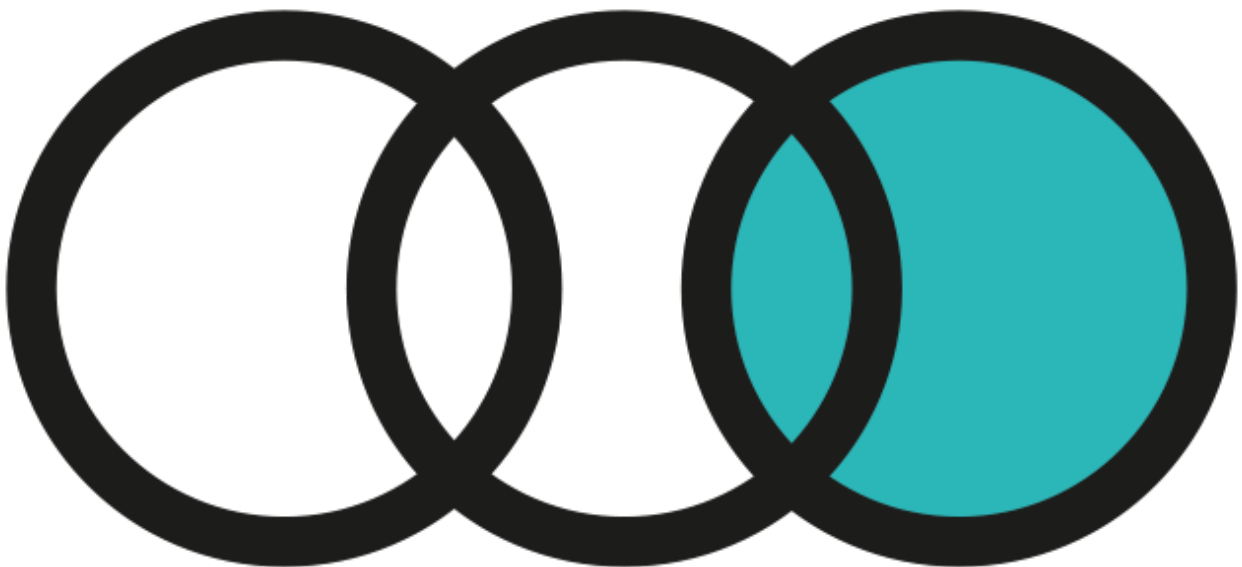
Additional Environmental objectives are contained and reviewed internally as part of the methodology described in 3.6.



## 7. DOCUMENT REVISIONS & GLOSSARY

REV. NO.	DETAILED DESCRIPTION OF CHANGE
0	Initial issue

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
FIM	Fraser Integrity Management
FWM	Fraser Well Management
GHG	Green House Gas
HSE	The Health and Safety Executive
ISO	International Standards Organisation
NSTA	North Sea Transition Authority
NUI	Normally Unattended Installation
MODU	Mobile Offshore Drilling Unit
O&T	Objectives & Targets
OCNS	Offshore Chemical Notification Scheme
OPEP	Oil Pollution Emergency Plan
OPRED	Offshore Petroleum Regulator for Environment and Decommissioning
OSPAR	Oslo and Paris Commission
PIMS	Pipeline Integrity Management System
PLONOR	Poses Little Or No Risk to the environment
PON1	Petroleum Operations Notice #1
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 - 2021 (MASTER 250522)

Final Audit Report

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