



S&K 2021 OSPAR Public Statement

SCKE-T60-Z-RA-0012 S&K 2021 OSPAR Public Statement
Revision date: 26 May 2022 Rev. C01

Schooner & Ketch Decommissioning Project

	Date	Name	Position	Signature
Prepared by:	26/05/2022	Andy Foster	Environmental Consultant	
Verified by:	26/05/2022	Paul Tyerman	Senior HSE Advisor	
Approved by:	26/05/2022	Stephen Diplock	Operations Director	
Responsible Party:	 <p style="text-align: center;">Three60 Energy 1st Floor, Regent Centre Regent Road, Aberdeen, AB11 5NS</p>			
[Security Class]				
Revision history				
Revision	Date	Reason for issue:		
C01	26/05/2022	Issued for Information		
A01	20/05/2022	Issued for Review / Comment		
Registration Codes				
Contract No:	External Doc No:	Tag(s):	System(s):	Facility / Area:
	360-A1001-Z-RE-012			S&K
Project Code	Originator Code	Discipline Code	Document Code	Sequence No
SCKE	T60	Z	RA	0012



DNO

S&K Decommissioning Project

S&K 2021 OSPAR PUBLIC STATEMENT

THREE60 Doc No: 360-A1001-Z-RE-012

Client Doc No: SCKE-T60-Z-RA-005



+44 (0) 1224 460460

www.three60energy.com

CONTENTS

REVISION AND AMENDMENT REGISTER	1
Contents	2
1 Introduction	3
1.1 Structure	3
2 THREE60's UKCS Operations	4
3 THREE60 Environmental Management System	7
4 Schooner and Ketch 2021 Environmental Performance	10
4.1.1 Production Chemical Use and Discharge	10
4.1.2 Atmospheric Emissions	10
4.1.3 Waste Management	11
4.1.4 Summary of Reportable Incidents	12
4.1.5 2021 Key Performance Indicators (KPI)	13



1 INTRODUCTION

Under the OSPAR Recommendation 2003/5, the Offshore Petroleum Regulator for Environment & Decommissioning (OPRED) requires that all United Kingdom Continental Shelf (UKCS) oil and gas operators undertaking offshore operations to prepare an annual statement of their Environmental performance, covering the calendar year, and make that statement available to the public.

THREE60 Energy Group is an independent energy service company offering complete asset life cycle expertise. In April 2021, THREE60 Energy Services Limited (a UK subsidiary operating company of THREE60 Energy Group) was appointed as the Installation Operator (Duty Holder) of the Schooner and Ketch platforms. This Public Statement describes the environmental performance of THREE60 Energy Services Limited (hereafter referred to as THREE60) in respect of its 2021 UKCS activities supporting the Schooner and Ketch Southern North Sea, late-life assets.

The Q1 2021 Schooner and Ketch environmental performance will be reported separately by Petrofac Facilities Management Limited. DNO North Sea (ROGB) Limited - the Schooner and Ketch License Holder, Well Operator and Pipeline Operator will also separately report the 2021 environmental performance of their respective well, decommissioning and pipeline activities.

1.1 Structure

This Public Statement is structured as follows:

- Section 2: Description of THREE60's UKCS (Schooner and Ketch operations) during 2021;
- Section 3: Summary of the THREE60 ISO 14001-certified Environmental Management System; and
- Section 4: Provides a summary of THREE60's 2021 environmental performance and Key Performance Indicators (KPIs).



2 THREE60'S UKCS OPERATIONS

Following the appointment of THREE60 as the Installation operator / Duty holder on 1st April 2021, THREE60's activities have focused on the delivery of safe operations on the Schooner and Ketch Normally Unmanned Installations (NUIs).

The Schooner and Ketch fields are located within Block 44/26a, and Blocks 44/28b respectively, approximately 150 kilometres from the Theddlethorpe Gas Terminal (TGT) on the Lincolnshire coast (Figure 1).

Following the cessation of production in 2018, the Schooner and Ketch NUIs (Figure 2) have been in warm suspension pending the completion of Well Plugging and Abandonment (P&A) activities to be performed at each installation, followed by platform decommissioning.

Figure 1: Location of the Schooner and Ketch installations and Fields

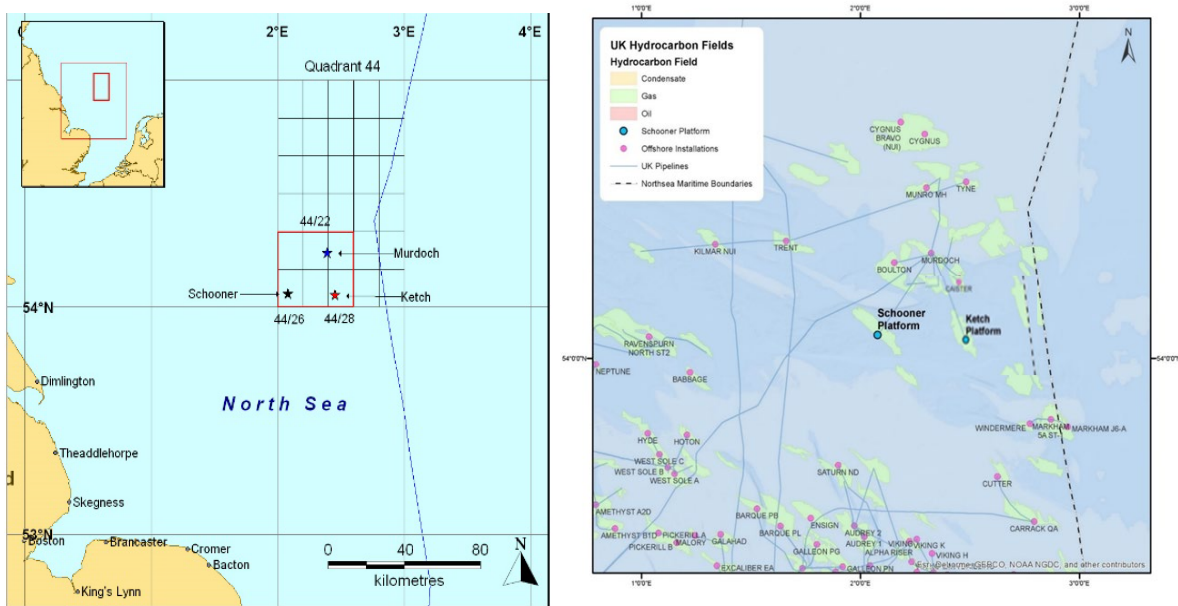


Figure 2: Schooner and Ketch Normally Unmanned Installations (NUIs).



During 2021, THREE60's activities have focused on the platform activities (illustrated in Figure 3), required to support:

- Safe operations including inspection and maintenance of platform safety and environmental critical equipment (for example, navigation aids and diesel generators for power generation), in accordance with the platform Safety Cases);
- Combined operations with the Valaris-owned Rowan Gorilla V (RGV) Jack-up Drilling Rig during Well Plugging and Abandonment (P&A) activities on behalf of DNO (ROGB) Limited;
- Platform preparations for Cold suspension (for example, topsides flushing, quantification of waste residues onboard, replacement of navigation aids and installation of bird deterrent system); and
- Platform preparations for arrival of a Heavy Lift Vessel to decommission the Ketch topsides and jacket (Q2/3 2022) and Schooner topsides and jacket (Q2/3 2023).

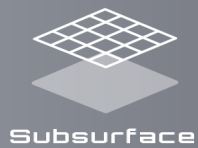
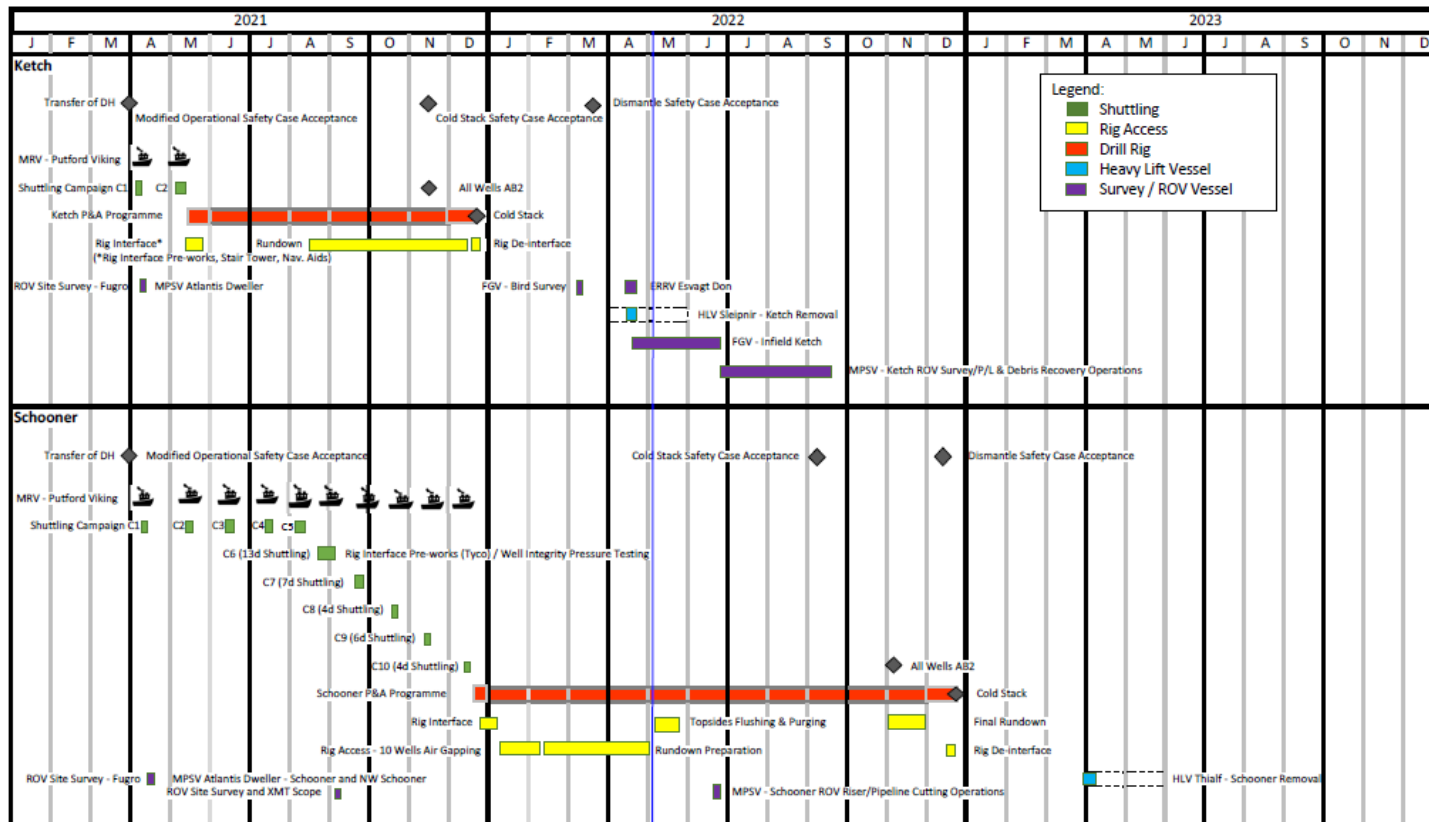
An emerging issue identified during 2021 was the potential for nesting birds (in particular Kittiwakes, *Rissa tridactyla*) to be present on the platforms at the time of decommissioning which may impact the planned heavy-lift activities during the summer season. Given the limited published evidence of kittiwakes breeding on offshore installations, THREE60 commissioned bird management consultants to gather baseline information on the presence and types of wild birds present on the Schooner and Ketch platforms during the 2021 offshore bird nesting season. From these offshore surveys, it was concluded that the Ketch platform may not be an important bird nesting site. However, nesting kittiwakes were observed on the Schooner platform.

Taking a worst case and precautionary approach, in preparation for Ketch platform decommissioning in Q2/3 2022, THREE60 installed a standalone, solar and battery powered, Bird dispersal system on the Ketch platform prior to the platform entering Cold Suspension in Dec 2021. The Schooner and Ketch offshore bird surveys and bird control measures will recommence in 2022, prior to the bird nesting season.

Figure 3: Schooner and Ketch Offshore Activities, 2021 - 2023



Schooner and Ketch Decommissioning - Offshore Overview



3 THREE60 ENVIRONMENTAL MANAGEMENT SYSTEM


Figure 4 illustrates the THREE60 Health, Safety & Environmental (HSE) Policy commitments which apply throughout THREE60's operations.

Last certified to the ISO 14001:2015 International Standard in November 2021 (Figure 5), the THREE60 Environmental Management System forms part of the THREE60 Integrated Management System (IMS).

THREE60's offshore activities are carried out in accordance with the company EMS and BEIS Guidance.



Figure 4: THREE60 Energy HSSE Policy




Health, Safety, Security and Environment (HSSE) Policy

THREE60 Energy Limited is committed to fulfilling its legal obligations to people and the environment where they may be affected by its business activities. The Chief Executive Officer has overall responsibility for Health, Safety, Security and Environment (HSSE) through the following policy statement. It is integral to our business to achieve an incident free environment in compliance with the relevant statutory provisions and other appropriate standards.

We commit to an incident free environment and to discharge our statutory duties through:

- A commitment to identify, reduce or eliminate HSSE risks wherever we work;
- A belief that all personnel injuries and environmental incidents are preventable;
- Providing and maintaining operational controls and safe work equipment, including personal protective equipment;
- Operating in a manner that minimises our impact on the environment whilst developing solutions to prevent pollution, reduce carbon emissions and reduce our overall environmental impact,
- Fostering leadership and a working environment that establishes, enforces and continually improves this policy;
- Recruiting and appointing competent personnel commensurate with their role and level of responsibility;
- Ensuring that tasks given to employees are within their sphere of competence where competence is maintained through the provision of support, resources and training as appropriate;
- Making efficient use of resources, re-use rather than dispose, where possible and promote the use of recycled materials whilst minimising operational energy consumption, atmospheric emissions and managing/ controlling effluent discharges;
- Securing our people, assets, technology, proprietary information and company reputation;
- A commitment to consultation with and participation of the workforce; and
- Empowering and supporting all personnel to "Stop the Job" should they have any concerns;

All personnel have a responsibility to undertake work in line with HSSE related statutory requirements, other appropriate standards and to identify unsafe working situations. Our HSSE policy will be reviewed continually to monitor its effectiveness and to ensure that it reflects changing needs and circumstances. This statement is to be read in conjunction with the responsibilities, arrangements, procedures, and guidance that together form the THREE60 Energy Limited Health and Safety procedures. Compliance with this policy is the responsibility of all personnel working on behalf of THREE60 Energy and is enabled through the commitment of all THREE60 Energy managers.

Signed:  Date: 20 December 2021

Walter Thain
Chief Executive Officer

Page 1 of 1
Health, Safety, Security and Environment (HSSE) Policy 360-POL-002 Rev 2.0



Figure 5: THREE60 Energy ISO 14001: 2015 Certificate



MANAGEMENT SYSTEM CERTIFICATE

Certificate no.:
10000510251-MSC-UKAS-GBR

Initial certification date:
11 January 2019

Valid:
20 December 2021 – 19 December 2024

This is to certify that the management system of
**THREE60 Energy Limited trading as
 THREE60 Energy Group**
THREE60 Operations Services Ltd
THREE60 EPCC Ltd
 1st Floor, Regent Centre, Regent Road, Aberdeen, AB11 5NS, United Kingdom
 and the sites as mentioned in the appendix accompanying this certificate
 has been found to conform to the Environmental Management System standard:

ISO 14001:2015

This certificate is valid for the following scope:

Provision of onshore and offshore services to the oil & gas, petrochemical, renewable and associated energy industries worldwide.

These services include:

- Duty Holder
- Engineering
- Construction
- Commissioning and
- Operations and Maintenance Support

Place and date:
London, 29 November 2021

For the issuing office:
DNV - Business Assurance
4th Floor, Vivo Building, 30 Stamford Street,
London, SE1 9LQ, United Kingdom




Doug Milne
Management Representative

Lack of fulfilment of conditions as set out in the Certification Agreement may render this Certificate invalid.
 ACCREDITED UNIT: DNV Business Assurance UK Limited, 4th Floor, Vivo Building, 30 Stamford Street, London, SE1 9LQ, United Kingdom - TEL: +44(0) 203 816 4000.
 www.dnv.co.uk



4 SCHOONER AND KETCH 2021 ENVIRONMENTAL PERFORMANCE

As NUIs with limited offshore processing systems, the Schooner and Ketch environmental permits include the requirement for a chemical permit, Consent to Locate and consent to vent gas from well annuli (Schooner only). There is no flare system, produced water or oily drains treatment onboard either platform.

Additional environmental aspects included within the scope of the THREE60 EMS include atmospheric emissions from platform power generation and standby vessels providing EERV cover, the generation of hazardous and non-hazardous wastes and the notification of reportable incidents. Statutory reporting for these notifications and environmental emissions occurs via the UK Energy Portal and Environmental Emissions Monitoring System (EEMS).

As described above, the 2021 environmental performance of DNO (ROGB) controlled activities and Petrofac Facilities Management Limited activities will be reported separately.

4.1.1 Production Chemical Use and Discharge

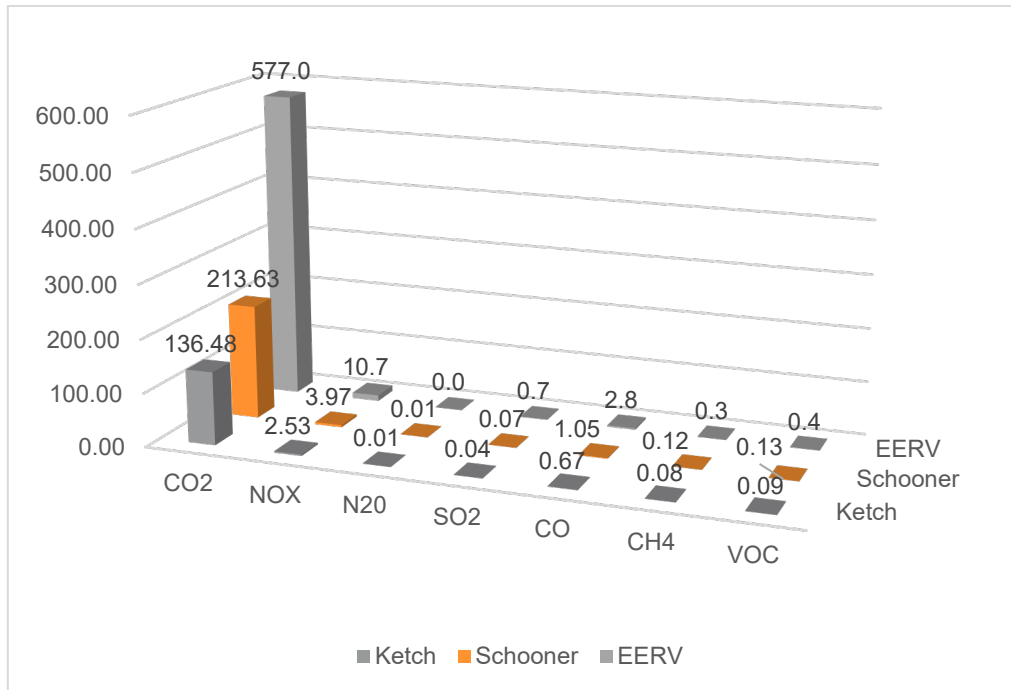
During 2021, there was no production or utility chemical use or discharge on either the Schooner or Ketch platforms.

4.1.2 Atmospheric Emissions

During 2021, 186.0 tonnes of marine diesel were consumed by standby vessels performing Emergency Response and Rescue Vessel (EERV) duties alongside the Schooner and Ketch NUIs. In addition, 42.7 and 66.8 tonnes of diesel were combusted onboard the Ketch and Schooner platforms, respectively, for power generation purposes.

Figure 6 illustrates the greenhouse gases generated from the Schooner and Ketch standby vessel duties (EERV) and power generation activities. In addition, 2.2 tonnes of gas were vented to atmosphere from the Schooner platform from the well annuli.

Figure 6: Schooner and Ketch 2021 Greenhouse gas (GHG) emissions from Standby vessel (EERV) duty and power generation



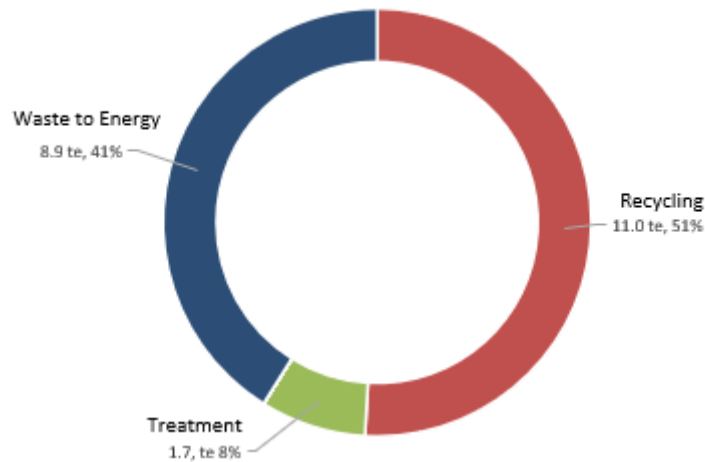
4.1.3 Waste Management

In 2021, approximately 7.3 tonnes and 14.4 tonnes of hazardous and non-hazardous wastes were generated onboard the Schooner and Ketch platforms, respectively. These wastes included waste oil, spent hazardous chemicals, empty drums and containers, general waste and scrap metal.

Approximately 60% of the total waste generated in 2021 from the Ketch platform resulted from flushing of the Ketch topsides processing equipment to remove gross hydrocarbons prior to the platform entering Cold Suspension.

All hazardous and non-hazardous waste was backloaded to shore for recycling, reuse or disposal as appropriate (Figure 6). Of the wastes returned to shore, 51% was recycled, 8% was recovered as waste to energy (for example, recovered condensate from flushing fluids and general waste) and the remaining 41% was treated. No waste went to landfill.

Figure 7: Fate of Schooner and Ketch Generated Wastes



4.1.4 Summary of Reportable Incidents

During 2021 there were no reportable incidents regarding unplanned hydrocarbon releases or unpermitted use or discharge of chemical from the Schooner and Ketch platforms. However, there were two reportable PON10 incidents, which resulted from:

- The temporary non-synchronisation of navigation aids and lights between the Ketch installation and the Rowan Gorilla V Jack-up Drilling Rig (May 2021). This fault was fixed following a visit by a specialist vendor engineer; and
- A power failure incident on the standby vessel providing support to the Ketch P&A campaign (Oct 2021). A new EERV was available to continue standby duties within 1h of the incident.

4.1.5 2021 Key Performance Indicators (KPI)

The 2021 HSE KPIs set for THREE60's Schooner and Ketch operations included:

KPI	Target	Status
Lost Time Injuries / Restricted Work Case / Medical Treatment	0	100%
RIDDOR Reportable incidents	0	100%
Near Miss Incidents	Count	5 (2 Env related)
Environmental Reportable Notifications	0	2 (PON10)
Regulator Enforcement Action	0	100%

The two non-reportable (environmental) near miss incidents resulted from the leaks of diesel or oil into the diesel generator bunds and were fully contained.