



OSPAR PUBLIC STATEMENT 2022

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May 2023

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AMENDMENT AND APPROVALS RECORD

Revision	Description of Amendment	Date	Originator
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SIGN OFF RECORD

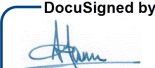
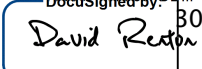

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Originator	Waldorf Petroleum SHE Manager	Andrew Mann	 DocuSigned by: Andrew Mann	30-05-2023 19:18 BST
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ABBREVIATIONS

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
DESNZ	Department for Energy Security & Net Zero
DP	Decommissioning Plan
EA	Environmental Assessment
EMS	Environmental Management System
ESG	Environment, Social and Governance
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 Energy Security & Net Zero (DESNZ), formerly 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 DESNZ 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 company's Safety and Environmental Management System (SEMS);
- State the company's environmental policy, goals, objectives and targets for 2023; and,
- Provide a performance summary for 2022.

2 EXECUTIVE SUMMARY

This document reports on the environmental performance of Waldorf Petroleum Resources Limited's (formerly known as Alpha Petroleum Limited and hereinafter referred to as Waldorf Petroleum) UK Continental Shelf (UKCS) operated offshore activities during 2022.

The Statement is focused on environmental issues associated with operations that were directly under the control of Waldorf Petroleum. It does not include discharges and emissions at host facilities operated by Perenco UK Limited (Perenco) or from facilities that 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.

Waldorf Petroleum met all its statutory and regulatory obligations during 2022 and achieved all its performance goals and objectives.

The Waldorf Petroleum Safety and Environmental Management System (SEMS) was independently audited against ISO 14001:2015 by Intertek and accreditation was maintained with no observations or non-compliances identified.

3 WALDORF PETROLEUM RESOURCES LIMITED

3.1 The Company

Waldorf Petroleum is Licensee, Field Operator and Well Operator for several small Southern North Sea (SNS) gas basin developments (Figure 1) which have ceased production.

The Waldorf Petroleum SNS assets 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 2022, Waldorf 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 Waldorf Petroleum licenses that were held in the UKCS during 2022.

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Table 1 – Waldorf Petroleum Licences held in the UKCS during 2022

Block	Interest	Licence	Field	UKCS Region
47/10a	100%	P001	Helvellyn	Southern North Sea
43/22a	17%	P683	Kilmar	Southern North Sea
42/25a, 43/21a	17%	P1034 (expired 6 February 2022)	Garrow	Southern North Sea
49/12a,	20%	P033	Wenlock	Southern North Sea
49/12b	100%	P1062	Wenlock	Southern North Sea
2/10b, 2/15a, 3/6a, 3/11b	100%	P1070	Cheviot	Northern North Sea

- With effect from May 2023 the SNS operated assets will be managed from Waldorf Petroleum's Aberdeen office and the Guildford office will be closed.
- With the Cessation of Production of Wenlock in October 2022, all SNS assets are now no longer in production and it is planned to P&A all ten SNS wells in a campaign for which engineering commenced in Q2 2023.
- Waldorf Petroleum currently remains as Well Operator for these assets. However, it is the company's intention to appoint Exceed Torridon Limited as Well Operator and a transition process has begun to this effect. Exceed Torridon is a well-established independent well management company with considerable experience as Well Operator in the UK.
- Waldorf Petroleum applied in Q2 2023 to NSTA to support the Well Operator appointment and has also carried out an audit to assess Exceed's capability, competence and resources for P&A management, engineering and execution.
- ODE Asset Management (ODEAM) will continue as Installation Operator and Pipeline Operator for the Tors and Wenlock assets.
- The Cheviot Development project, on hold since 2020, will revert to the subsurface appraisal stage, work that will now be performed in Waldorf Petroleum's Aberdeen office.
- The base case is that the Kilmar wells will be P&A in the same campaign as Tors and Helvellyn.
- Discussions with a renewables operator to repurpose the Wenlock platform, post P&A, will continue.

There were no drilling or well intervention operations during 2022 and none are planned in 2023.

There was no production from Helvellyn, Garrow or Kilmar during 2022.

Of the SNS assets, only the Wenlock platform remained in production in 2022. This too ceased production on 7th October 2022 when Perenco UK ceased production operations on the host facility, Inde 49/23A-AC. All Waldorf's SNS assets have therefore now permanently ceased production and decommissioning planning is in progress.

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Despite that fact that Waldorf Petroleum's production was limited through 2022 and ceased altogether in October, all operations that were required to maintain the safety and environment critical elements (SECE) on each asset were completed satisfactorily under the ODE SEMS.

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 Waldorf Petroleum is the Field Operator and Well Operator.

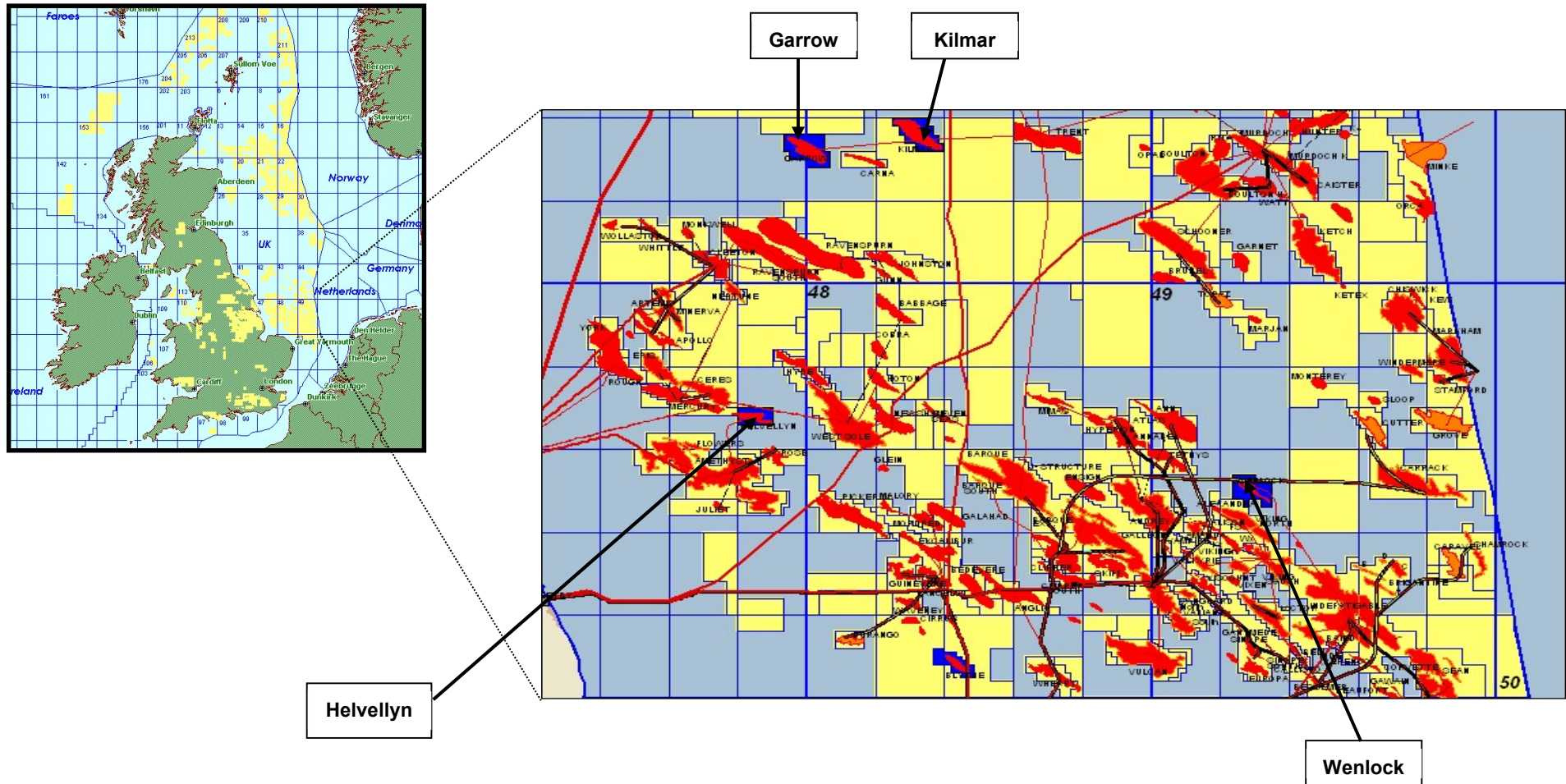
The Helvellyn Development comprises a single subsea well tied back to the Perenco operated Amethyst A2D platform via a 15.4km 8-inch pipeline. During production the well was controlled and monitored from the control room at the Perenco operated Bacton Gas Terminal.

Helvellyn ceased production in 2017 when the host platform shut down and it has remained shut in since this time. Perenco commenced decommissioning the entire Amethyst field during 2022 and, in preparation for platform removal, the Helvellyn pipeline and umbilical were flooded with seawater and flushed clean. All flushing fluids were disposed of into the well. A plug was set in the flooded pipeline within the Amethyst 500m zone to allow the line to be cut in preparation for platform removal. The umbilical was also plugged for the same purpose.

Waldorf Petroleum commenced P&A engineering for Helvellyn in Q2 2023.

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Figure 1 – Location of Waldorf 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:

Waldorf Petroleum (Field Operator)	17%
Energiean UK Ltd	68%
Rockrose (UKCS3) Limited	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. Waldorf Petroleum 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).

Although no longer in production, each platform remains shut in and fully maintained in accordance with current Safety Case.

The base case for both Kilmar and Garrow remains P&A of all wells in a campaign with other Waldorf Petroleum assets.

3.2.3 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:

Waldorf Petroleum (Field Operator)	20%
Energiean UK Ltd	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 ceased production on 7th October 2022. The pipeline was subsequently flushed with seawater pumped from Indefatigable (Inde) 23AC and the flushing liquids were disposed of into one of the Wenlock wells.

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The Wenlock platform topsides pipework was subsequently purged, the wells isolated and the platform put into HCS status by ODEAM. Well P&A will be undertaken in a rig-based campaign with other Waldorf Petroleum SNS assets.

3.2.4 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 Waldorf Petroleum. It was initially 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 several 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.

It has been decided to take the project back to the subsurface appraisal stage.

4 ENVIRONMENTAL MANAGEMENT SYSTEM

Waldorf 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). Waldorf 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.

Waldorf Petroleum's parent company shares the same SHE values and has embodied them into its own SH&E Policy and Corporate Major Accident Prevention Document. It is under these overarching documents that the Waldorf Petroleum SEMS operates.

The scope of SEMS is the management of safety and environmental aspects related to Waldorf 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, production and decommissioning within the UK Continental Shelf (UKCS) for which Waldorf 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 Waldorf Petroleum has S&E responsibilities.

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 Waldorf corporate Environmental, Social and Governance (ESG) Policy;
2. The Waldorf 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, Waldorf Petroleum's SEMS is independently verified. Initial certification to ISO14001:2015 was completed in June 2018 and has been maintained continuously since that time. The SEMS is subject to annual surveillance audits and a three-yearly recertification audit.

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



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

Waldorf 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 Waldorf Petroleum platforms and pipelines which they manage as Platform and Pipeline Operator.

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

Figure 2 – Waldorf ESG Policy

Environmental, Social and Governance Policy Statement

The Waldorf Environmental, Social and Governance statement applies to all Waldorf assets together with all exploration, appraisal, development and decommissioning activities of Waldorf. For the purposes of this statement, the Waldorf group of companies is referred to as "Waldorf".

Waldorf is a UK headquartered offshore oil and gas company focussed on expanding its Joint Venture business portfolio through the acquisition of long life producing or near development assets and through strategic partnerships with like-minded companies.

In considering its Environmental, Social and Governance (ESG) impacts, Waldorf has established a clear ESG policy which is applicable to its current and future business activities. Waldorf sees ESG as an essential sustainable business component which reflects the values of the organisation and its commitment to sound ESG principles:

Environmental Principles:

- Actively seek opportunities to continually improve Waldorf environmental performance.
- Exert influence upon JV partners and contractor organisations in order to optimise the opportunities for environmental improvement.
- Proactively explore opportunities to reduce our carbon footprint and greenhouse gas emissions within our invested operations and throughout our supply chain.
- Continue to identify and implement measures to reduce energy consumption associated with our operations.
- Collaborate with relevant government and industry bodies to ensure Waldorf environmental practices remain current and relevant to its environmental credentials.
- Manage all Waldorf environmental aspects and impacts through a robust and properly resourced Environmental Management System.
- Manage waste streams in line with Government hierarchy of environmental controls and opportunities.

Social Principles:

- Support healthy lives and well-being for our people.
- Encourage personal development to optimise individual and collective performance.
- Recognise and encourage people's actions aligned with our values, behaviours and business principles.
- Support diverse and inclusive recruitment processes.
- Partner with organisations in support of local community good causes.

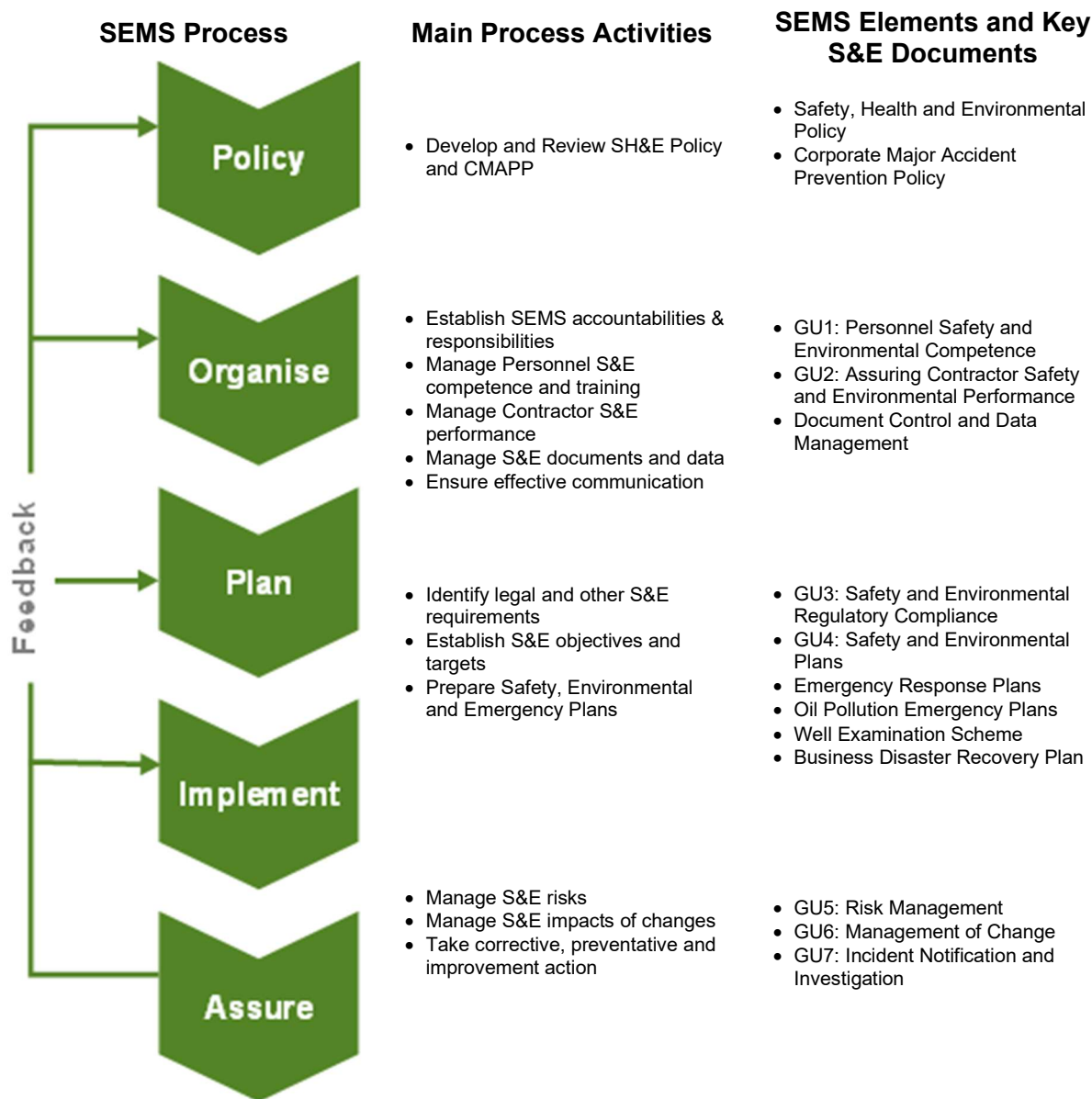
Governance Principles:

- Maintain and monitor best-practice ESG governance arrangements.
- Commit to ESG reporting in line with government requirements and expectations.
- Communicate our climate change performance and our processes for governance and risk management with internal and external stakeholders in a transparent and consistent manner.
- Prevent bribery and corruption through the adoption of robust standards and controls.
- Provide robust compliance assurance and governance systems for all business activities and undertakings.



Erik Brodahl
 CEO
 May 2023

Figure 3 – SEMS Framework



5 2022 ENVIRONMENTAL PERFORMANCE

5.1 Overview of 2022 Activities

5.1.1 General

Gas production continued at Wenlock alone, all other fields having previously ceased to flow. The delay to Wenlock CoP was largely due to the required level of support from the host platform operator Perenco being unavailable, as project teams were engaged in other scopes in the early part of the year, and thus Wenlock continued to flow.

Waldorf Petroleum performed no well operations during 2022, there was no production from Tors or Helvellyn fields and no offshore activities in the Cheviot Field.

Safety and environmental management activities within the year were primarily focused on the changing operating status of the SNS assets and their progress towards well P&A, decommissioning, re-purposing or, in the case of Wenlock, continued operation in late field life.

5.1.2 Well Operator Transition

It is proposed to transition Well Operatorship to an independent well management company. This transition process is ongoing at the time of writing.

5.1.3 Helvellyn

The field remained shut in all year and relevant well data was reported by the Perenco Bacton control room. Throughout 2022 the Operatorship of the pipeline remained with Perenco. Waldorf Petroleum remained as Well Operator.

With the decommissioning of Amethyst approaching, Waldorf Petroleum continued to plan for decommissioning and flushing of the Helvellyn pipeline:

- A visual survey of the wellhead and pipeline route by ROV was completed early in Q1 with satisfactory results. The pipeline and umbilical remain fully buried with no exposures or free spans.
- A detailed Comparative Assessment was conducted to study all pipeline decommissioning options proposed. The completed report and its recommendations were submitted to and accepted by OPRED.
- Pre-decommissioning environmental sampling surveys were completed in August.
- A decommissioning Supply Chain Action Plan (SCAP) was completed.
- The well was previously covered under the Amethyst OPEP and an Alpha OPEP was therefore prepared, submitted to and accepted by BEIS.

During August the pipeline and umbilical were flooded and flushed from Amethyst to Helvellyn with all fluids injected into the well. The pipeline was left clean and flooded with seawater at ambient pressure and all well valves were closed.

A mechanical plug was set by Perenco at the Amethyst end of the line to allow the pipeline to be cut in preparation for removal of the Amethyst A2D platform. The umbilical was likewise plugged at A2D. An updated Major Accident Prevention Document (MAPD) was produced following decommissioning, underlining the fact that the flooded pipeline no longer represented a Major Accident Hazard (MAH).

5.1.4 Tors – Garrow

Garrow remained shut in and isolated throughout 2022. The platform had been previously placed in HCS status, isolated and depressurised. A program of planned interventions 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).

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Waldorf Petroleum continued to plan towards pipeline flushing and Garrow well P&A. Waldorf Petroleum had previously drafted the Cessation of Production (CoP) document, prepared the Standard Economic Template and the Supply Chain Action Plan (SCAP) supporting this process.

During 2021 Garrow had been identified as a potential candidate platform for use in a Carbon Capture and Storage (CCS) project. Waldorf Petroleum provided subsea and subsurface data to the project partners to explore this re-use option for the Garrow infrastructure. However, there was no significant progress towards this in 2022. Waldorf Petroleum continues to be open to re-use opportunities while progressing well P&A planning.

5.1.5 Tors – Kilmar

Like Garrow, Kilmar also remained shut in and isolated throughout 2022. Interventions were likewise scheduled to address SECE priorities and power generation reliability.

The base plan is to progress P&A in a rig-based campaign with other Waldorf Petroleum assets.

5.1.6 Wenlock

Wenlock remained in production during 2022, other than when constrained by planned shutdowns by the host operator platform and export system until finally ceasing on 7th October. Subsequently the export pipeline and MEG import pipeline were flushed and cleaned with all fluids disposed of into the well. The topsides pipework was drained, purged and air-gapped from the wells and the export pipeline. This brought Wenlock into HCS status.

The Decommissioning Program (DP) has been previously accepted by OPRED along with the Environmental Appraisal (EA) and Comparative Assessment (CA) reports.

In addition to the HCS scope activities, interventions to the platform took place throughout the year 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 previously identified as a candidate platform for use as a nesting site for seabirds to offset the impact on local seabird populations of planned and existing nearby windfarm turbines. Waldorf Petroleum has therefore continued to engage with the wind farm operators and regulators to explore how this repurposing might be achieved, post P&A.

5.1.7 Cheviot

The development of Cheviot was initially 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 NSTA (then OGA) for this reason.

5.2 2022 Environmental Aspects Register

Key environmental risks were 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 Waldorf Petroleum offshore assets, these findings remain substantially unchanged from 2021. Given the absence of development project scopes for which consideration was originally included in the register, its approach may be considered very conservative.

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 ODEAM;
- 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 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 2022 Environmental Objectives

Given that Waldorf Petroleum's operations are predominantly 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 Waldorf Petroleum. 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;

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- Meeting the commitments made in the Waldorf Petroleum SH&E and CMAPP Policies.

All applicable environmental objectives were met although many objectives continue through into the 2023 S&E Plan. For 2022 the following environmental objectives were set and their status at the end of 2022 is noted in red:

- Ensure full legislative and regulatory compliance;

Completed.

All Waldorf Petroleum's activities during 2022 continued to follow government guidance and comply fully with legislation.

- Continue the review, communication and internal audit of Waldorf 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;

Completed.

The Waldorf Petroleum 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 2022. The SEMS is subject to annual independent audit which was completed in May 2022. The audit report stated that the management system was found to be fully effective and that there were no nonconformities.

- 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;

Completed.

The SEMS Policy was updated to include the Net Zero obligations of the NSTA's Stewardship Expectation SE-11 and published in May 2022. No changes were identified for the CMAPP, which was last revised in November 2021 to better reflect the company's position as Well Operator, rather addressing the platform and pipeline major accident hazards (MAHs) which are the responsibility of the pipeline and platform Operator.

- Maintain ISO 14001:2015 accreditation and an awareness of the SEMS by all personnel;

Completed.

The independent audit of the SEMS was completed by Intertek on 23rd May 2022 and a further surveillance audit was completed 6th March 2023. In each case no actions were required, no non-conformities were identified and the management system was determined to be fully effective.

Awareness of the SEMS by all personnel was maintained by the participation of all senior management personnel at the annual Management Review, the circulation of the Management Review report to all staff and the active promotion of the company's safety and environmental culture at weekly operational meetings.

- Participate (with ODEAM) in emergency response and OPEP exercises for Tors or Wenlock operations;

In September 2022 a successful emergency response exercise was conducted with ODEAM and Restrata (*Exercise Hansen*), based on a simulated release and fire from a failed SSSV control line on Kilmar well K3. The incident progressed

through callout of ER teams, contact with relevant Crisis Management personnel and management of the evacuation of the platform.

The incident scenario was designed to test the effectiveness of communications between the Installation Operator, the emergency response support contractor and the Well Operator and to work through the handover of primacy in the event of a well incident. A post-exercise report by exercise directors Restrata concluded that all exercise objectives had been met in full.

- Continue to monitor, audit and review ODEAM safety and environment performance as Installation and Pipeline Operator;

A Safety Case Regulation 5 audit of ODEAM as Duty Holder was carried out in November and December 2022. The audit was performed independently over 3 days by DNV and identified several improvement opportunities but found no non-conformities, concluding that there is good adherence to the requirements of the Safety Case regulations.

- Maintain the S&E Plan to set Company objectives and targets;

Completed.

The safety and environmental plan was updated following the Management Review.

- 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.

Completed.

Risk assessments were completed as part of the development of the Helvellyn OPEP and the CA's for Helvellyn and Wenlock pipeline decommissioning. Operational risk assessments were also carried out routinely where any deficiencies or impairments were noted to SECEs and in support of Well Dispensations on the Tors and Wenlock platforms.

- 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;

Completed.

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

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

Completed.

The Well Examination Scheme continued through 2022 by independent Well Examiner CDIL, whose annual well integrity review for the year was issued in March 2023. The review covered all existing operational and suspended wells; no new drilling or well re-entry work was undertaken during the year.

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

Completed.

A suspension application for the two Garrow wells was submitted in April and consented. No well operations other than routine integrity testing were conducted in 2022, for which vent consents were in place. Vent consent

applications were submitted again in September 2022 for these planned operations in 2023 and consents issued.

- Schedule and ensure identified personnel undertake appropriate SHE training;
Completed.

A training schedule is maintained for all Waldorf Petroleum personnel. 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 completed for senior management personnel in January 2022. Relevant personnel participated in desktop ER exercises organised by Restrata, joined by ER team members from the Installation Operator.

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

N/A.

There were no environmental incidents during the year.

5.4 2022 Environmental Performance Summary

This Section provides a summary of performance in relation to compliance with relevant legislation. The extent to which the 2022 environmental goals and objectives of the Waldorf Production SEMS policy were achieved is discussed in Section 5.3 above.

5.4.1 Production Operations

Production operations during 2022 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 ODEAM intervention teams.

A total of 57 day visits were made to Tors (24 and 33 to Garrow and Kilmar respectively) and 49 day visits to Wenlock through the year. There were no overnight stays on any asset. These numbers are higher than in 2021 and reflect a remedial maintenance and inspection scope identified and implemented following transfer of Installation Operatorship from Perenco to ODEAM.

5.4.2 PON1 Incidents

There were no PON1 incidents during 2022.

5.4.3 Chemical Use and Discharge

During 2022 there was no chemical use at, or discharge from, any of the SNS assets.

5.4.4 Venting

Consents were granted for essential, safety-related well maintenance venting of hydrocarbon gas on Wenlock, Garrow and Kilmar during 2022. There was no venting other than for this purpose in 2022. Quantities vented during 2022 were 0.18t for Wenlock, 0.39t for Garrow and 0.56t for Kilmar.

5.4.5 Emissions

During 2022 approximately 39t of diesel fuel was consumed on Kilmar for power generation and approximately 31t on each of Garrow and Wenlock. The corresponding CO₂ emissions were approximately 126t for Kilmar and 101t for each of Garrow and Wenlock. The figures remain the same as 2021 and reflect the continuous operation of each platform on a single diesel generator.

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

6 2023 ENVIRONMENTAL OBJECTIVES

The planned activities for the SNS operated fields during 2023 are as listed below. Except for inspection and maintenance activities performed by ODEAM under their own safety and environmental management system, all Waldorf Petroleum activities are office-based:

Helvellyn

- License Holder and Field Operator management activities, including well P&A and decommissioning planning.
- Well Operatorship until this is transitioned to Exceed.
- Pipeline Operatorship after this is transferred from Perenco.

Tors and Wenlock

- License Holder and Field Operator management activities, including well P&A and decommissioning planning.
- Well Operatorship until this is transitioned to Exceed.
- Ongoing operation and maintenance of platforms by ODEAM.

Cheviot

- License Holder and Field Operator management activities.
- Subsurface re-appraisal (based in Waldorf offices Aberdeen)

All Assets

Engineering for well P&A works for all assets will be undertaken by the incoming Well Operator, Exceed Torridon. Ongoing inspection and maintenance of the offshore platforms will continue by ODEAM under the respective safety cases as Installation Operator. Waldorf Petroleum will transition Well Operatorship to Exceed during 2023 but will continue to perform the duties of Licence Holder and Field Operator, all of which are office-based.

Based on these activities, the Environmental objectives set by Waldorf Petroleum for 2023 remain broadly the same as the previous year:

- Ensure full legislative and regulatory compliance;
- Continue the review, communication and internal audit of Waldorf 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 ESG 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 and Exceed) in emergency response and OPEP exercises for Tors or Wenlock operations (in the capacity of Field Operator and Licence Holder, rather than as Well Operator);
- Continue to monitor, audit and review ODEAM safety and environment performance as Installation and Pipeline Operator;

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- Monitor, audit and review Exceed Torridon's safety and environment performance as Well 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 well P&A and decommissioning for all assets;
- As Licence Holder and Field Operator, ensure all necessary submissions are made to regulators to support the environmental consenting process;
- Schedule and ensure identified personnel undertake appropriate SHE training;
- Ensure any environmental incidents are investigated and followed through to closure.