




# S&K 2022 OSPAR Public Statement

SCKE-T60-Z-RA-0009 S&K 2022 OSPAR Public Statement  
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## Schooner & Ketch Decommissioning Project

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# S&K Decommissioning Project

S&K 2022 OSPAR PUBLIC STATEMENT

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# 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 document is the second Public Statement prepared by THREE60 Energy Services Limited (hereafter referred to as THREE60) describing the environmental performance of its 2022 UKCS activities supporting the Schooner and Ketch Southern North Sea, late-life assets.

As described previously, the environmental performance of 2022 Schooner and Ketch activities (e.g. well Plugging and Abandonment (P&A), decommissioning and pipeline activities) managed by DNO North Sea (ROGB) Limited - the Schooner and Ketch License Holder, Well Operator and Pipeline Operator will be reported separately.

## 1.1 Structure

This Public Statement is structured as follows:

- Section 2: Description of THREE60's UKCS (Schooner and Ketch operations) during 2022;
- Section 3: Summary of the THREE60 ISO 14001-certified Environmental Management System; and
- Section 4: Provides a summary of THREE60's 2022 environmental performance and Key Performance Indicators (KPIs).



## 2 THREE60'S UKCS OPERATIONS

Following the appointment of THREE60 as the Installation operator / Duty holder on 1<sup>st</sup> 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

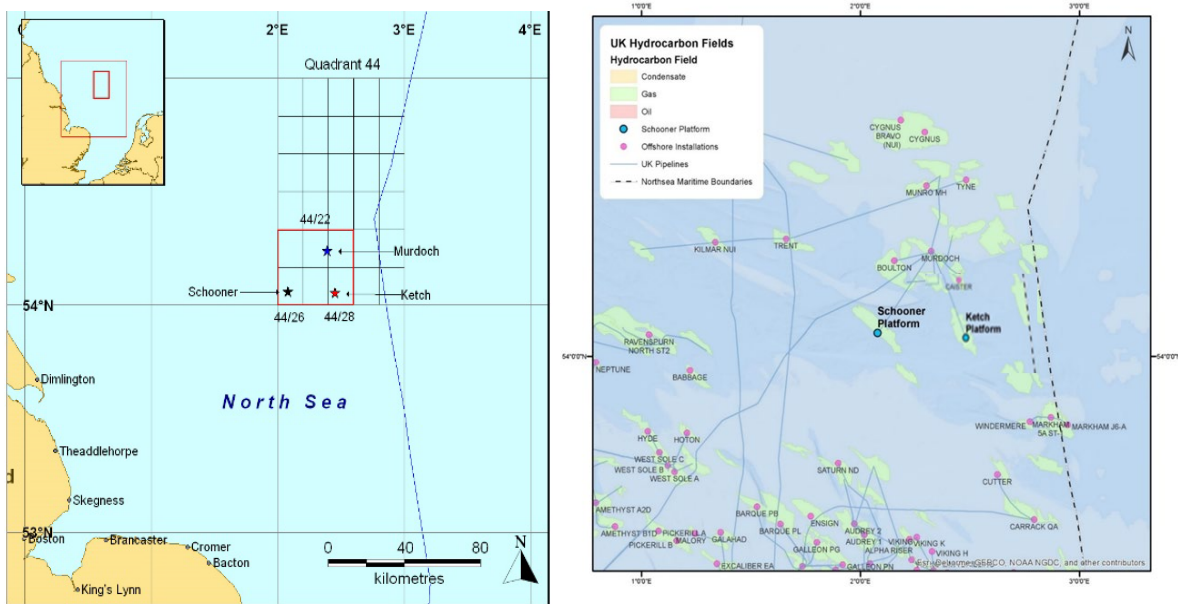


Figure 2: Schooner and Ketch Normally Unmanned Installations (NUIs)



During 2022, 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 a 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 2021-22 was the potential for nesting birds (in particular Kittiwakes, *Rissa tridactyla*) to be present on the platforms during April – September, overlapping with the timing of (summer) heavy lift vessel operational windows required for the safe dismantling of offshore platforms. Given the limited published evidence of kittiwake breeding on offshore installations, in 2021 THREE60 commissioned bird management consultants to gather baseline information on the presence and types of wild birds on each platform during the nesting season. From these platform-based 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.

Despite the absence of nesting birds on the Ketch platform, prior to the platform entering Cold suspension in December 2021, THREE60 assumed a worst case and precautionary approach to nesting birds and installed a standalone, solar and battery powered, bird dispersal system on the Ketch platform to deter seabirds from the area.

To gather further information on bird nesting, the platform-based bird surveys recommenced in 2022 focusing on the Schooner platform. In addition, the following activities were successfully trialled and the results shared with the Department for Business, Energy & Industrial Strategy (BEIS):

- Ketch platform location, March 2022: Pre-arrival of Heavy Lift Vessel – A vessel-based nesting bird monitoring survey (Figure 4) was trialled as a modified method of monitoring bird nesting, as platform-based surveys were not practicable on a platform in Cold suspension. The use of birds of prey - flown from the same vessel - as method of deterring kittiwakes and other seabirds within from the platform location. Whilst no nesting birds were observed from the vessel, the use of pyrotechnics and falcons flown directly onto the platform (from the vessel) allowed observers to confirm that no birds were displaced from the platform that may have otherwise gone unnoticed.

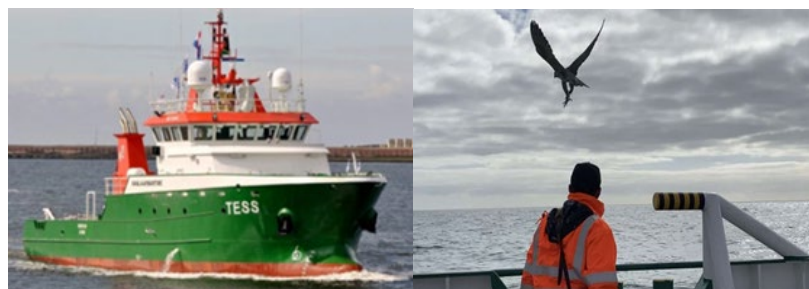


Figure 3: Vessel used for bird survey; Bird of prey taking off from vessel



The Ketch platform was successfully removed in April 2022 with the vessel-based nesting bird survey confirming no interaction with nesting birds.

- Schooner platform, early – late May 2022: A three-week bird of prey (deterrent) and bird monitoring programme was trialled at the Schooner platform (Figure 5). Three birds of prey were housed on the Schooner platform and regularly flown (during daylight hours) from the platform to determine whether they'd constitute an effective deterrent to seabirds boarding the platform. Commencing immediately prior to the arrival of migrating Kittiwakes, the trial demonstrated that kittiwakes were actively deterred from boarding the platform and that no nesting occurred during the trial despite kittiwakes being present on the sea surface in the early morning. Following the end of the trial, kittiwakes successfully nested on the installation, however, the platform surveys, confirmed a significant (75%) reduction in the number of nests built on the Schooner platform compared with the previous 2021 nesting data.



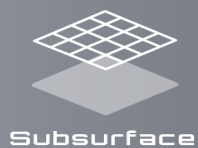
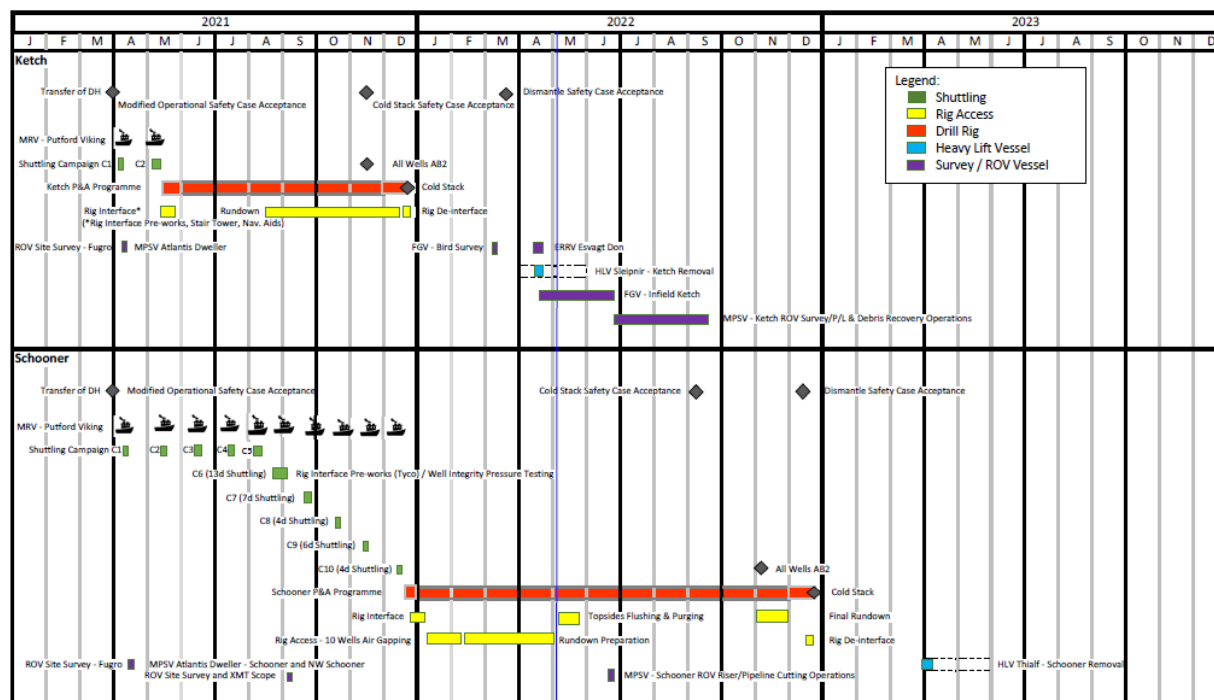
Figure 4: Birds of Prey on perch; Seabirds on sea surface prior to daily bird of prey flights

Given the success of the vessel-based nesting bird survey method and bird of prey deterrent programme, these mitigations will be considered for use in support of the removal of the Schooner platform, planned for Q2/3 2023.

Figure 5: Schooner and Ketch Offshore Activities, 2021 – 2023



### Schooner and Ketch Decommissioning - Offshore Overview



### 3 THREE60 ENVIRONMENTAL MANAGEMENT SYSTEM


Figure 6 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 7), the THREE60 Environmental Management System forms part of the THREE60 Integrated Management System (IMS) and passed a surveillance audit in 2022.

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



Figure 6: THREE60 Energy HSSE Policy



### Health, Safety, Security and Environment (HSSE) Policy

THREE60 Energy's vision is to operate in a safe, reliable and efficient manner, providing a safe place of work, managing process safety, personal health and safety, security and environmental protection.


This will be achieved by:

- Identifying and eliminating or reducing risk to as low as is reasonably practicable, including mitigating the risk from Major Accident Hazards and preventing pollution and other impacts from Major Environmental Incidents
- Identifying and managing the security risks arising in the business including those arising from international travel
- Instilling a belief that zero harm is possible and that all personal injuries and environmental incidents are preventable
- Committing to fulfil all our legal and compliance obligations
- Promoting a healthy workplace and mitigating the risks to peoples' health and wellbeing
- Promoting strong safety leadership and accountability, encouraging leaders to establish HSSE KPIs, objectives and targets and holding them to account for business and HSSE performance
- Committing to consultation and engagement with employees
- Efficiently using natural resources
- Ensuring continual improvement in all aspects of our business
- Careful application of this HSSE Policy and the implementation of our Integrated Management System, which is certified to or compliant with ISO 9001, ISO 14001 and ISO 45001
- Encouraging an open and transparent culture, empowering our personnel to make structured and timely decisions
- Utilising a program of audit and assurance to verify that our processes and procedures are effective and robust
- Empowering and supporting all personnel to "Stop the Job" if they have any concerns

The Chief Executive Officer has overall responsibility for Health, Safety, Security and Environment (HSSE). It is integral to our business to achieve an incident free environment in compliance with the relevant statutory provisions.

All employees and others working for us are expected to support the Company's commitment and engage constructively with our efforts to manage HSSE and to raise any concerns that they may have. We will also facilitate confidential reporting or "whistleblowing" for those who wish to remain anonymous.

All employees have a responsibility to undertake work in line with HSSE related statutory requirements, other appropriate standards and to identify unsafe working situations. 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: **Walter Thain**  
Chief Executive Officer

Date: 20<sup>th</sup> October 2022

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Health, Safety, Security and Environment (HSSE) Policy 360-POL-002 Rev 3.0

Figure 7: 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 a chemical permit, Consent to Locate for each NUI and a 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 2022 environmental performance of DNO (ROGB) controlled activities will be reported separately.

### 4.1.1 Production Chemical Use and Discharge

During 2022, there was no production or utility chemical use or discharge on either the Schooner or Ketch platforms.

### 4.1.2 Atmospheric Emissions

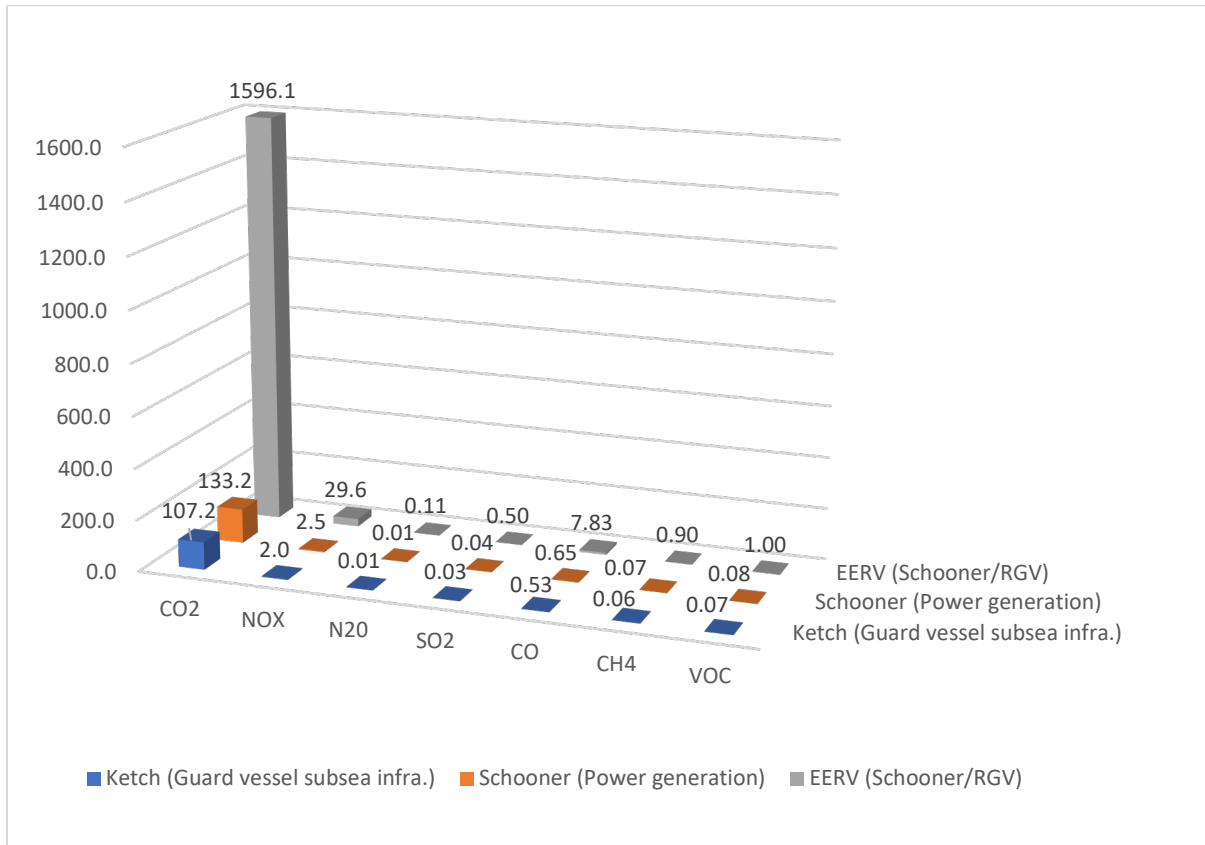
During 2022, 498.8 tonnes of marine diesel were consumed by the standby vessel performing Emergency Response and Rescue Vessel (EERV) duties alongside the Schooner NUI and RGV) Jack-up Drilling Rig during well P&A activities (on behalf of DNO ROGB Limited) and Schooner platform engineering down activities (e.g. topsides equipment flushing, draining activities and backloading of wastes). In addition, 41.6 tonnes of diesel were combusted onboard the Schooner platform for power generation purposes.

Following decommissioning of the Ketch platform in April 2022, 33.5 tonnes of diesel were also used by a Guard vessel protecting the remaining Ketch subsea pipeline infrastructure.

Figure 8 illustrates the greenhouse gases generated from the Schooner and Ketch standby vessel duties (EERV), Guard vessel and Schooner platform power generation activities. No gas was vented to atmosphere from the Schooner platform well annuli during 2022.



Figure 8: Schooner and Ketch 2022 Greenhouse gas (GHG) emissions from Standby vessel (EERV) duty, Schooner power generation and Guard Vessel protecting subsea infrastructure (post Ketch platform removal)



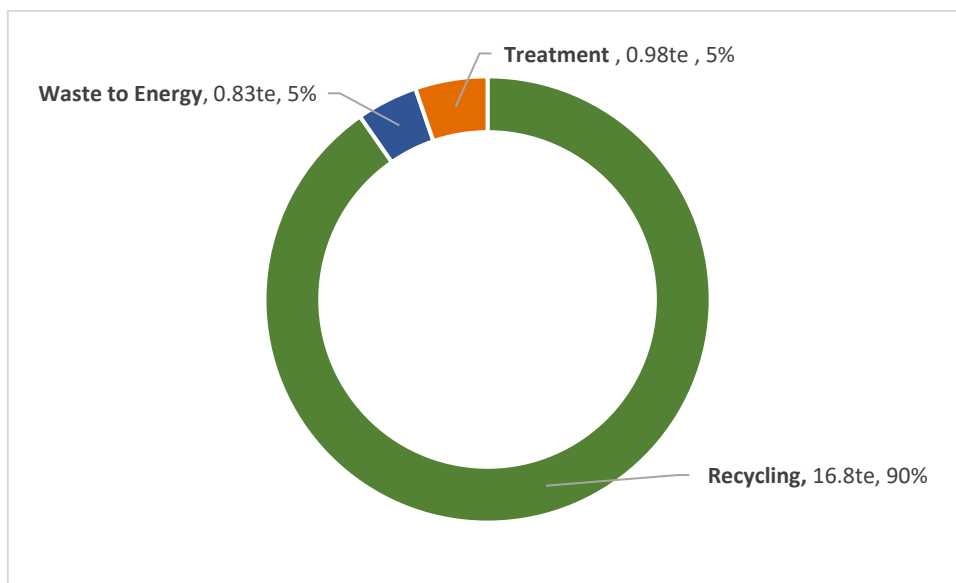
### 4.1.3 Waste Management

In 2022, approximately 8.0 tonnes and 10.6 tonnes of hazardous and non-hazardous wastes, respectively, were generated onboard the Schooner and Ketch platforms which was broadly similar to the total quantities of hazardous and non-hazardous wastes (i.e. 7.3 tonnes and 14.4 tonnes, respectively) generated during similar activities performed during 2021, mostly at the Ketch platform. The waste types generated in both years included waste oil, spent hazardous chemicals, empty drums and containers, general waste and scrap metal.

The majority (ca. 96% or 17.8 tonnes) of the total waste generated during 2022 was from engineering down activities onboard the Schooner platform prior to it entering Cold Suspension in September 2022. The remaining 4% waste (ca. 0.76 tonnes) comprising general wastes, waste oils, chemicals and sludges and liquids was generated from final works performed onboard the Ketch platform prior to it entering Cold suspension in Dec 2021, where the fate of the backloaded Ketch waste was reported at the start of 2022.

All hazardous and non-hazardous waste was backloaded to shore for recycling, reuse, treatment and/or disposal as appropriate (Figure 9). Of the wastes returned to shore in 2022, approximately 90% was recycled, 5% was recovered as waste to energy (for example, recovered condensate from flushing fluids and general waste that could not be recycled) and the remaining 5% was treated. Higher levels of waste recycling were achieved in 2022 (90%) compared with 2021 (51%), mainly the result of higher quantities of recyclable scrap metal, wood and general waste backloaded from the Schooner platform compared with Ketch in 2021. In both 2021 and 2022, no waste went to landfill.

Figure 9: Fate of Schooner and Ketch Generated Wastes (2022)





#### 4.1.4 Summary of Reportable Incidents

During 2022 (and as in 2021), there were no reportable incidents regarding unplanned hydrocarbon releases or unpermitted use or discharge of chemical from the Schooner or Ketch platforms. During 2022 there were also no PON10 incidents which represented an improvement on 2021 when there were two reportable PON10 incidents.

#### 4.1.5 2022 Key Performance Indicators (KPI)

The 2022 HSE KPIs set for THREE60's Schooner and Ketch activities included:

KPI	Target	Status
Lost Time Injuries / Restricted Work Case / Medical Treatment	0	100%
RIDDOR Reportable incidents	0	100%
Near Miss Incidents	Count	0
Environmental Reportable Notifications	0	0
Regulator Enforcement Action	0	100%

During 2022, all of the HSE KPIs were achieved which represented an improvement on 2021 when two reportable PON10 incidents occurred.