

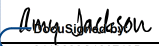
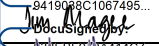
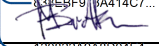



DNO North Sea (ROGB) Limited 2022 OSPAR Public Statement

SCKE-FPROGB-S-RA-0058 DNO North Sea (ROGB) Limited 2022 OSPAR Public
Statement

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Schooner & Ketch Decommissioning Project

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1 Introduction

Under the OSPAR Recommendation 2003/5, the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED) requires that all existing United Kingdom Continental Shelf (UKCS) oil and gas operators undertaking offshore operations prepare an annual statement of their environmental performance, covering the calendar year, and make that statement available to the public. This document represents DNO North Sea (ROGB) Limited's annual public environmental statement for 2022 in relation to UKCS OSPAR reporting.

2 DNOs UKC Operations

DNO is an independent oil and gas group focused on exploration, appraisal and production in Norway, the Atlantic Margin and the UKCS. In January 2019, DNO successfully acquired Faroe Petroleum (ROGB) Limited (Faroe). Faroe had historically operated the two producing assets (Schooner and Ketch), located within the UK Southern North Sea gas basin. 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 2-1). The Schooner and Ketch Fields ceased production in 2018 in line with TGT's cessation of operations and were subsequently granted formal Cessation of Production (COP) in November of the same year. DNO is the former licensee for the Schooner and Ketch fields and is ultimately accountable for the safe and responsible decommissioning of both fields.

Figure 2-1: Location of the Schooner and Ketch Fields.



In 2021 the Duty Holdership for the Schooner and Ketch installations was successfully transitioned from Petrofac to Three60 Energy (Three60). Three60 will report the environmental performance related to the operation and maintenance of these installations through their OSPAR Public Statement for 2022. DNO is the Well Operator for Schooner and Ketch fields,

as well as Pipeline Operator. Subsequently, this public statement specially relates to Schooner and Ketch wells and pipelines operations.

Both the Schooner and Ketch installations are four-legged, twelve-slot Normally Unmanned Installations (NUI). When the platform wells were producing, they were remotely controlled from the Murdoch platform. Gas and condensate were exported to Murdoch, where separation and compression occurred before the gas was transported via the (then) ConocoPhillips-operated Caister Murdoch System (CMS) infrastructure to TGT for processing.

In association with COP, DNO have submitted Decommissioning Programmes (DPs), coupled with the supporting Environmental Appraisal and Comparative Assessment reports, for Schooner and Ketch. Final approval of both DPs was received from OPRED in July 2019. As planning for the Schooner and Ketch Decommissioning Project progressed, DNO decided to completely remove the Ketch pipeline in order to reduce impacts to future users of the sea and to eliminate residual liability. The Ketch DO was updated accordingly and approved in 2021.

The scope of the Schooner and Ketch Decommissioning Project is:

- The plug and abandonment (P&A) of 20 platform wells (9 at Ketch and 11 at Schooner) and one sub-sea well at North West Schooner;
- The burial of the Schooner pipelines at the Schooner and Murdoch ends and the cut and recovery of the Ketch pipeline;
- The recovery of miscellaneous grout bags and concrete mattresses at various points along the pipelines; and
- The removal of topsides and jackets from both the Schooner and Ketch installations.
- The cut of Topaz 6" pipeline and umbilical by Heavy Lift Vessel (HLV), which will be recovered by INEOS (Pipeline Operator).

All items recovered were safely transported to suitable, permitted and licensed onshore facilities for recycling and disposal. Upon completion of the decommissioning scope, surveys were carried out and debris was removed. In accordance with approved DPs, periodic surveys will be agreed with BEIS/OPRED in order to monitor any infrastructure that has been left in-situ.

Decommissioning Works that have been completed to date (i.e. in cooperation with Three60, the installation(s) Duty Holder) include:

- Flushed, cleaned pipelines for Schooner (PL1222: 18" wet gas export and PL1223: 3" methanol piggyback) and Ketch (PL1612: 18" wet gas export and PL1613: 3" methanol piggyback) have been filled with seawater and disconnected from the Murdoch end.
- Topaz pipeline (tied back to Schooner NUI) has been flushed, cleaned and filled with seawater.
- All 20 platform-based wells and 1 subsea well have been successfully P&A'd (please note: Schooner and NW Schooner P&A campaign was completed January 2023)
- Ketch NUI was removed April 2022, with final disposal currently underway (see Figure 2-2).

- Approximately 50% of the Ketch pipelines (PL1612 and PL1613) have been removed (Summer 2022) and disposed of (see Figure 2-3).
- Following P&A operations, the Schooner NUI was successfully transitioned to Cold Stack and she awaits removal (scheduled for 2023).

Figure 2-2: Ketch NUI Removal (April 2022)

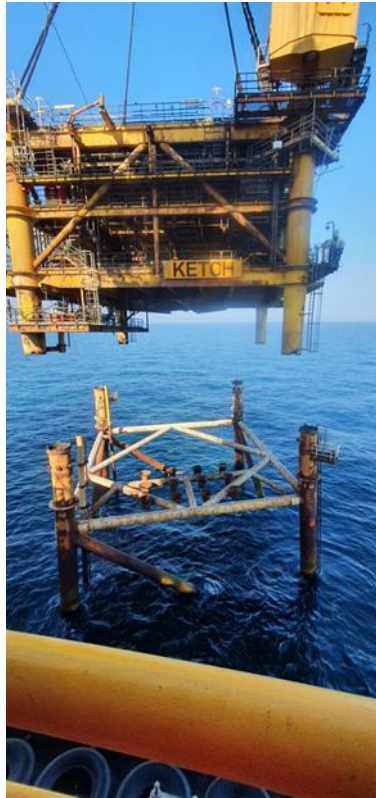
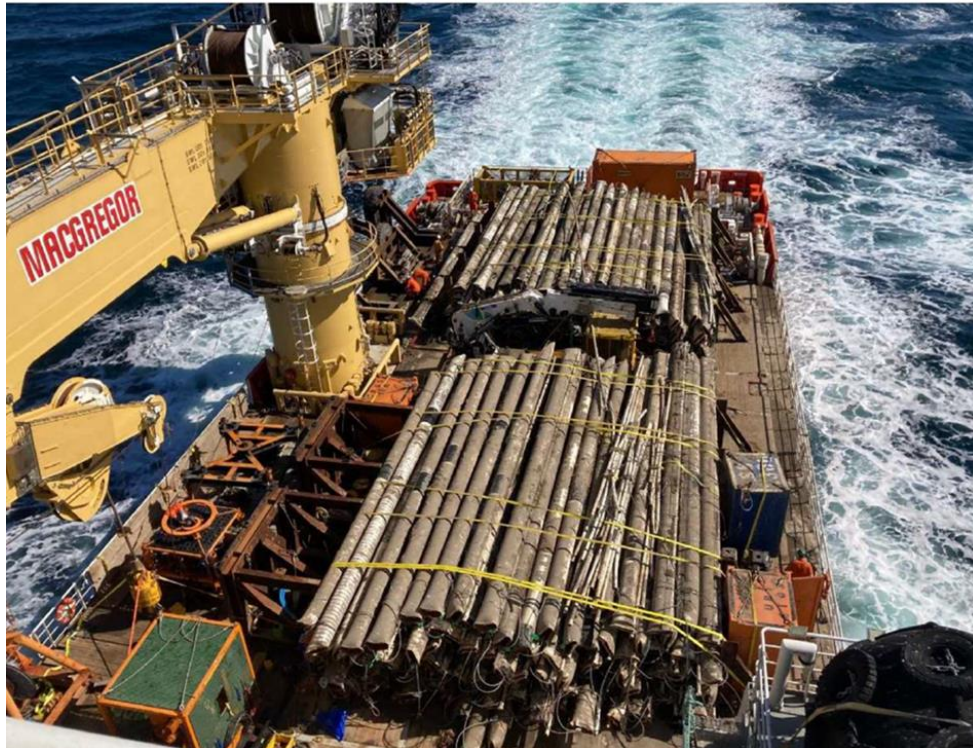


Figure 2-3: Ketch Pipeline Decommissioning (Summer 2022)



3 DNOs Health, Safety, Security and Environmental (HSSE) Policy

DNOs is committed to managing the integrity of its operations and business activities responsibly. Our HSSE Policy (3.1) is a public commitment to this which supports our core values and focuses DNOs Management Systems on robust risk management and incident prevention.

Figure 3.1 DNO's HSSE Policy.



Title:	Health, Safety, Security and Environmental (HSSE) Policy Statement	Pages:	2
Rev.:	3	BU / Function:	Corporate / HSE
Accountable:	Bjorn Dale	Published:	28/04/2022
Owner:	Chris Spencer	Valid from:	25/04/2022
Author:	Hossein Safaei	Next Revision:	11/05/2023
Ref. docs.:	[RelatedDocs.txt]		

CORP-POL-HSE-011

Health, Safety, Security and Environmental (HSSE) Policy Statement

DNO is committed to managing the integrity of its operations and business activities responsibly. Consideration of the health, safety and security of our personnel, our other stakeholders and the environment is central to how we conduct our business.

We strive to create a rewarding working environment for our employees, contractors and the communities in which we operate. We are committed to the HSSE goals of:

- Avoiding harm to all personnel involved in, or affected by, our operations;
- Preventing pollution and minimizing the impact of our operations on the environment and biodiversity;
- Complying with the applicable legal and regulatory requirements where we operate as well as relevant industry standards; and
- Achieving continuous improvement in our HSSE performance.

This Policy Statement shall be implemented through the Company's business management system, "the DNO Way", to ensure:

- A work environment characterized by respect, trust, cooperation, and a shared understanding of DNO's values where concerns can be freely raised;
- HSSE is integral to the roles and responsibilities of everybody who works for and with DNO;
- HSSE risks are identified, understood, assessed and controlled;
- Delivery of continuous improvement by setting clear HSSE goals at the business unit and individual levels, achieving these goals through rigorous planning and execution of work and a trained and competent workforce and learning from our successes and failures; and
- Engagement with our suppliers and contractors to ensure alignment with our values and goals.

Our commitment to health and wellbeing:

- Prevention of work-related illness;
- Active health promotion to reduce health risks associated with the work environment;
- Allowing freedom of association and expression; and
- Maintain a diverse workforce free from discrimination.

Our commitment to safety:

- Provision of a safe workplace, free from injuries and accidents;
- Maintenance of asset integrity through sound design, maintenance, inspection, operations and management of change procedures; and
- Ensure an open reporting culture for incidents and near misses from which we learn to avoid recurrent incidents.

Our commitment to the environment and communities:

- Minimize undesirable effects on the environment and biodiversity resulting from our activities;
- Promote the reduction of emissions and pollution from our operations; and
- Contribute to the sustainable development of the regions where we operate.

Our commitment to security:

- Provide a secure work environment for all personnel involved in our activities and
- Abide by the Voluntary Principles on Security and Human Rights.

The responsibility for compliance with this policy lies with everybody who works for and with DNO. It is the role of the Managing Director of DNO ASA to ensure compliance with this Policy and the DNO Way through line management combined with regular reviews and audits.

4 DNOs Management System

DNO has implemented a Business Management System (BMS) that fully integrates Health, Safety, and Environment (HSE) policies, standards, procedures, and work instructions. The general purpose of the BMS is to prevent DNO activities from putting people, the environment, property or the reputation of the company at risk and aims to:

- Achieve full compliance with the OSPAR Recommendation 2003/5 to promote the use and implementation of Environmental Management Systems by the offshore industry;
- Achieve the general objectives of the OSPAR offshore strategy;
- Achieve the environmental goals of the prevention and elimination of pollution from offshore sources and of the protection and conservation of the maritime area against other adverse effects of offshore activities; and
- Maintain continual improvement in environmental performance.

The environmental elements of the BMS:

- Have been implemented at a strategic level and integrated into corporate plans and policies;
- Identify the organisation's impacts on the environment and set clear objectives and targets to improve its management of these aspects and the organisation's overall environmental performance;
- Ensure preventative actions are incorporated to avoid negative impact to the environment;
- Are designed to deliver and manage compliance with environmental regulations on an ongoing basis, and to quickly initiate corrective action where potential cases of legal non-compliance are identified;
- Identify DNO's significant resource use and aim to deliver good resource management; and
- Incorporate assured requirements and performance metrics that demonstrate the above and can be communicated in a transparent manner.

It is noted that DNO's Environmental Management System (EMS), i.e. as part of the DNO's overarching BMS, was successfully externally re-verified in 2021, as required by OSPAR.

5 2022 Environmental Performance

5.1 2022 UKCS Offshore Operations

DNO aims to minimise its environmental impact from operational and business activities undertaken annually. Offshore operations that were conducted by DNO as Wells and Pipelines Operator in the UKCS in 2022, are outlined in Section 5.2.

5.2 2022 Summary of Operations and Reportable Incidents

Table 5.1 provides a summary of the Schooner and Ketch operations undertaken during January to December 2022.

Please note that reportable emissions relating to the Schooner and Ketch installations for 2022 are presented in Three60 Energy's Public Statements for 2022 as Installation(s) Duty Holder.

Table 5-1: DNO's 2022 UKCS Operations

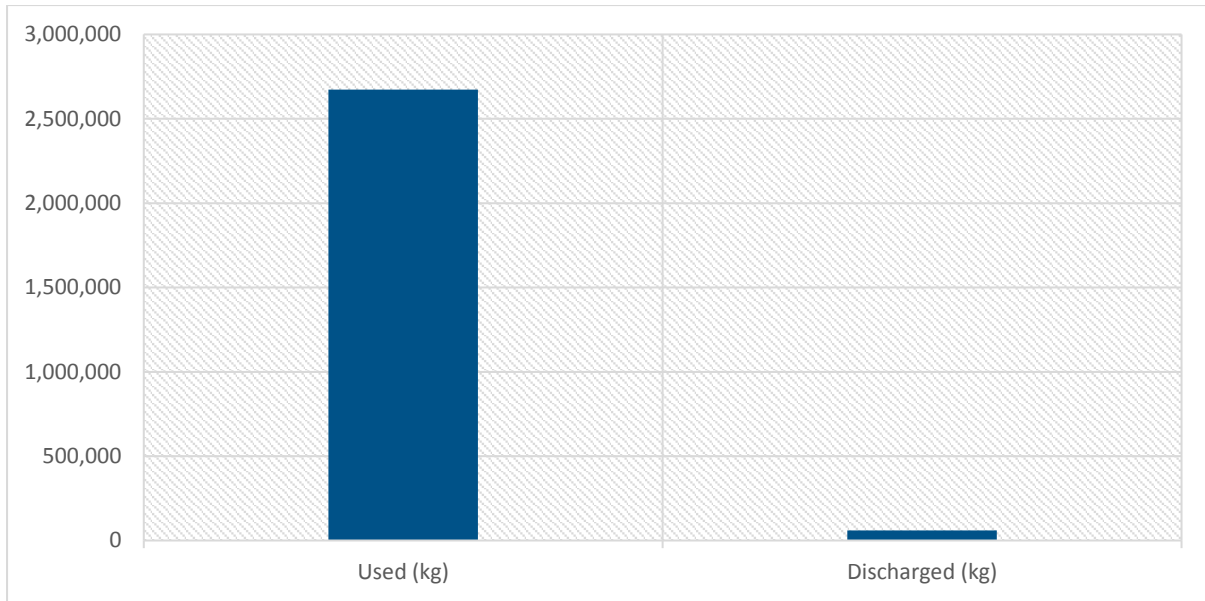
Drilling & Well Related Activities	Schooner NUI	Ketch NUI
Wells Drilled	0	0
Well Operations (includes P&A)	Schooner P&A campaign: NUI wells (11) P&A'd	P&A completed Dec 2021
Pipeline Operations	0	Disconnect all pipelines from risers and installation. Cut and recovery of 18" wet gas export and 3" methanol pipelines (50% completed in 2022).
Installation Related Activities		
Jacket & Topside Removal	0	1

5.3 2022 Chemical Use and Discharge

During 2022, a total of 2,673,809 kg of chemicals were used throughout P&A operations. A total of 60,310 kg of chemicals were discharged to sea (

Figure 5-1). All chemicals used and discharged during operations were in accordance with the Offshore Chemical Regulations (OCR) and were fully permitted. There were no instances of chemical permit non-compliance in 2022.

Figure 5-1. 2022 Chemical Use and Discharge Summary



5.4 2022 Waste

Throughout the 2022 Decommissioning Operations, a total of 9276.92 tonnes of waste was generated. Of this 1505.68 tonnes (16.23 %) was reused, 7066.89 tonnes (76.18 %) was recycled, 51.09 tonnes (0.55 %) went for waste to energy, 641.42 tonnes (6.90%) was treated and 37.16 tonnes (0.4%) was landfilled. Please note that the vast majority of recycled material was pipelines from the Ketch subsea campaign and part of the Ketch jacket and recovered conductors from well P&A. No waste was incinerated. Please see Figure 5-2 for an annual summary of 2022 waste and Figure 5-3 for a monthly breakdown of the waste.

Figure 5-2. 2022 Waste Treatments - Annual Breakdown

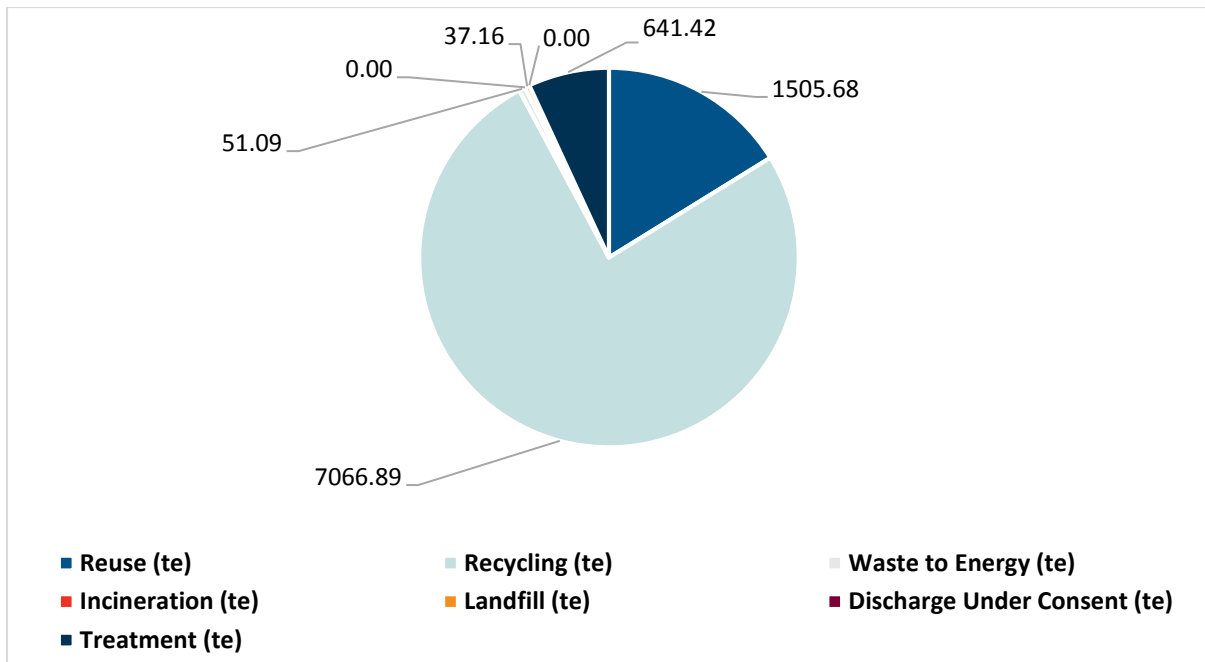
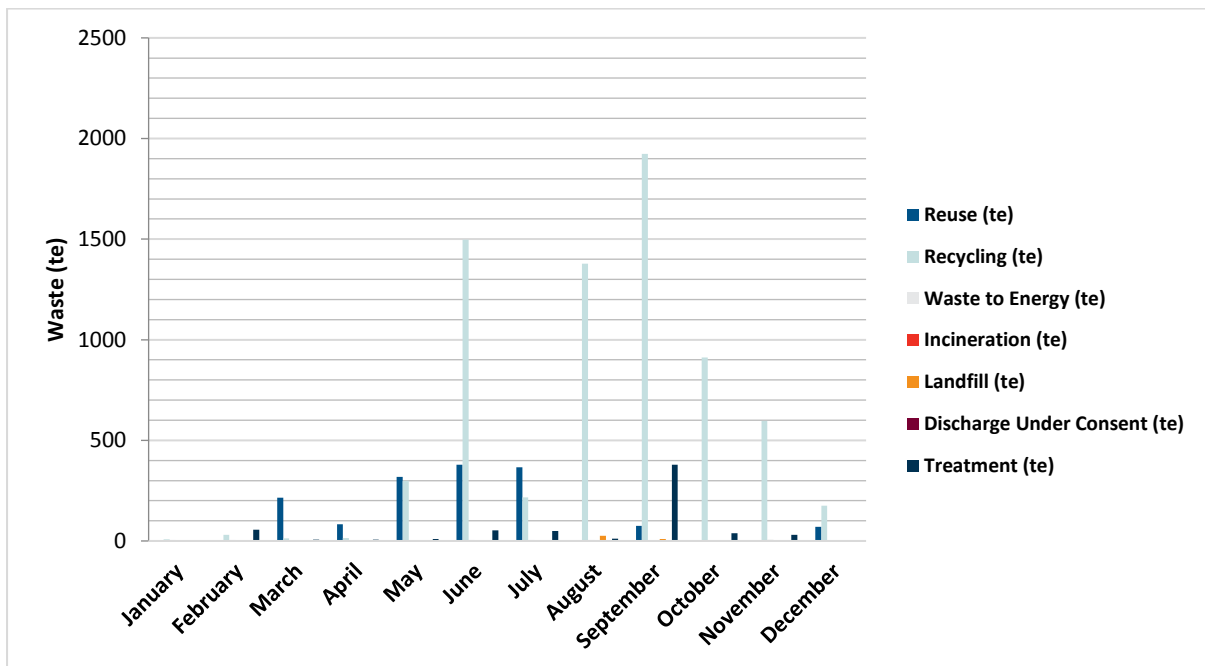


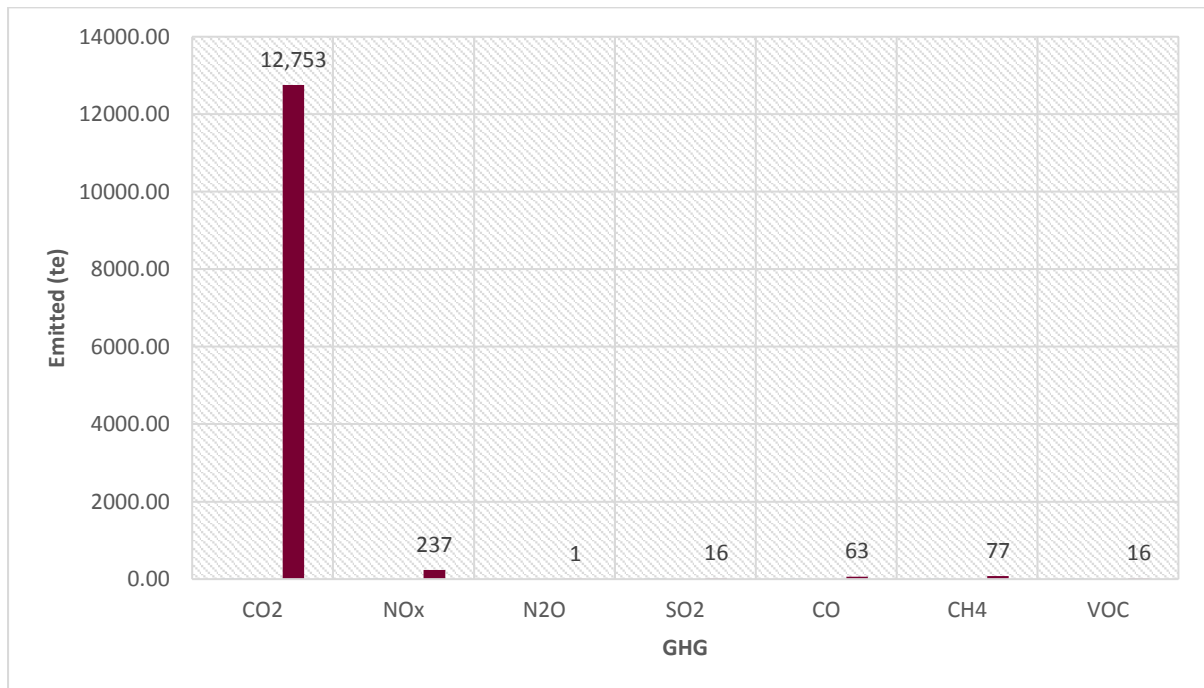
Figure 5-3. 2022 Waste Treatments - Monthly Breakdown



5.5 2022 Atmospherics

During 2022 decommissioning operations diesel usage totalled 3,985 tonnes, equating to approximately 12,753 tonnes of CO₂ (Figure 5-4). Furthermore, an estimated 84.47 tonnes of natural gas was potentially vented unignited to the atmosphere during P&A operations. This is included within the CH₄ and VOC emissions illustrated in Figure 5-4.

Figure 5-4. 2022 GHG Emissions



5.6 2022 Unplanned Releases

Unplanned releases to sea can have a negative impact on the marine environment, DNO work to minimise this risk with a focus on prevention. DNO ensure regulatory approved Oil Pollution Emergency Plans (OPEPs) are put in place for all relevant operations. During 2022 there were zero unplanned chemical releases and three unplanned oil releases (Table 5-1), resulting in a total of 0.0105 tonnes released to sea.

Table 5-1. 2022 Unplanned Hydrocarbon Releases.

Operation	Hydrocarbon Releases		
	No of Notifications	Estimated Quantity (tonnes)	Brief Description
P&A	1	0.001	Surface sheen noted during conductor recovery operations (14.09.2022)
	1	0.008	1 litre hydraulic fluid release from Gorilla V jack-up Hillman Roller lift cylinders during P&A operations (05.11.2022)
	1	0.0015	1.5 litres hydraulic fluid released from ROV as a result of hydraulics failure (15.11.2022)

5.7 2022 Other Reportables

There were three reportable incidents that occurred in 2022: one Lost Time Incident (LTI) and two Reportable Oil and Gas Incidents (ROGIs). Summarised details of these incidents are as follows:

- ROGI: High Potential (HIPO) Dropped Object (DO) when 31 kg clamp fell 18.6 m from (offline) wireline beam. No injuries or asset damage (14.03.2022).
- LTI: Fall from height during quayside (pipeline offloading) operations, resulting in a grazed head and injured shoulder. Injured person (IP) signed off of work for 21 days (11.08.2022).
- ROGI: HIPO DO when 2 kg linear inducer pin fell 14 m and struck IP on hand, resulting in ligament damage and restricted workday case (20.10.2022).

6 2022 Key Performance Indicators (KPIs)

The over-riding objective for the Schooner and Ketch Decommissioning Project is to conduct P&A and, removal, dismantling and disposal operations in a safe and environmentally responsible manner. For the duration of the Project, HSE objectives and targets have been defined annually and agreed with key contractors. These objectives and targets, or KPIs have been updated in accordance with the risk profile presented during various operations/phases. Project KPIs for 2022, including final status as reported, are presented in 1.

Table 6-1. Schooner and Ketch Decommissioning Project HSE KPIs for 2022 (including status).

Defined KPI	Status
Audit, Review and Verification - 90 % compliance with 2022 ARV Plan.	
Compliance Assurance - 90 % compliance with S&K Decom PLANC, resulting in ZERO delayed UK - approvals	
Emergency Preparedness - ER exercises and drills (including Tier 1 contractors) completed as planned.	
Total Recordable Incident Rate - < 0.9 per 200,000 manhours NB: DNO TRI target is not frequency based (<2 for 2022), but TRIF is provide adequate support for achievement	TRIR = 0.86
No Reportable Spills (PON1s) - Aligned with DNO NS BU KPIs	Three PON1s
No reportable HIPOs (High Potentials) - Aligned with DNO NS BU KPIs	Three HIPOs
No Regulatory Non Compliances - No permit non compliances	
Asset Integrity - Minimum of 98% SECE maintenance completed (<2% backlog) for S&K operations and P&A operations	
Demonstrable HSE Leadership - 8 Senior Management purposeful visits to the project per year	
Adhere to waste hierarchy: eliminate, re-use, recycle, treatment, dispose - Ensure tubulars from P&A operations are re-used, not recycled	
97% - Quantity of Waste Recycled - Includes recovery target for Ketch Disposal	76.2 %