



ENVIRONMENTAL REPORT

2022

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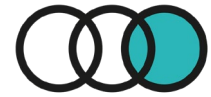
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1. INTRODUCTION

Under OSPAR Recommendation 2003/5 to Promote the Use and Implementation of Environmental Management Systems (EMS) by the Offshore Industry, the Department for Business, Energy and Industrial Strategy (BEIS) requires all Operators of offshore installations, including Well Operators, to produce a Public Statement to report their environmental performance.

These public statements must be prepared on an annual basis (covering offshore installation activities carried out during the previous calendar year), made available to the public and copied to BEIS by 1st June of each year.

In accordance with this requirement, this document reports on the environmental performance of Fraser Well Management Limited's (FWM), UK Continental Shelf (UKCS) operated offshore activities during 2022.

This report focusses on environmental issues associated with operations which were directly under FWM's control as Well Operator. Therefore, it does not include discharges and emissions at host facilities or from facilities which are operated under environmental consents held by the Installation Operator or Duty Holder; these discharges and emissions are included within the associated Company's public statement.

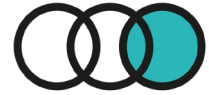
This report is a statement designed to:

- Describe the scope of FWMs offshore activities;
- Provide a description of the FWM Environmental Management System (EMS);
- State the company's environmental policy, goals, objectives and targets; and
- Provide a performance summary for 2022.

The Fraser group of companies were acquired by Three60 Energy on July 1st 2022, undergoing a period of integration thereafter. The company names were changed on 31st January 2023 as follows,

- Fraser Well Management Ltd to Three60 Energy Wells UK Ltd
- Fraser Integrity Management Ltd to Three60 Integrity Management Ltd

As this documents' reporting period pre-dates these name changes all references to company names and activities refer to the former company names.



2. FRASER GROUP COMPANIES

The Fraser Well Management was established in 2004 and is headquartered in Great Yarmouth (UK), with offices in Aberdeen (UK) and Rotterdam (The Netherlands). We provide cost-efficient and customised solutions to assist our clients in delivering their energy projects, safely, on time and within budget in all regions of the world. Our services cover the complete lifecycle of oil and gas wells, ranging from drilling, well intervention, production, well maintenance and pipeline integrity management through to abandonment – both onshore and offshore. With strong engineering and supervisory expertise and an extensive track record of high-quality results, Fraser provides a comprehensive package of well management services, including well engineering, project management, well and pipeline operatorship, abandonment, and commercial services.

At Fraser we recognise that our activities interact with and have an impact upon the environment, therefore we have an ethical responsibility to minimise the effects of our activities. Fraser have committed to continue to assess our impacts alongside opportunities for further reduction, while supporting the UK's net-zero 2050 ambition using our skills, resources and expertise to reach this goal.

The head office of Fraser Well Management is located at:

Beacon Innovation Centre

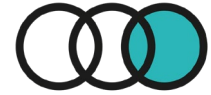
Beacon Park

Gorleston

Norfolk

NR31 7RA

Further information can be found at www.three60energy.com.



3. FWM ENVIRONMENTAL MANAGEMENT SYSTEM

This section provides a short overview of the FWM Management System as it operated in 2022.

3.1. Introduction

FWM is committed to achieving high standards of health, safety and environmental performance and will ensure that all reasonable and necessary resources are made available to achieve these goals. FWM recognise that the nature of our activities may give rise to major accident hazards for clients, employees, contractors, infrastructure, and the environment. Therefore, FWM has obligations to all stakeholders to reduce the risks associated with such hazards to levels as low as is reasonably practicable (ALARP).

In order to assist in meeting our obligations, the company continues to maintain a certified Integrated Management System (IMS), which includes the Safety and Environmental Management System (SEMS) which meets the requirements of ISO 45001 & ISO 14001.

3.2. SEMS

FWM operates under an Integrated Management System and SEMS to enable the goals and aims of the Company's Environmental Policy (Figure 1) to be achieved.

The scope of the SEMS is the management and control of safety and environmental aspects related to FWM's responsibilities as Well Operator.

The key components of the SEMS are as follows:

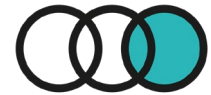
- Health & Safety Policy
- Environmental Policy
- Corporate Major Accident Prevention Policy (CMAPP)
- SEMS Description
- Health & Safety and Environmental Manual & Procedures
- Business Support Procedures
- Operational Procedures
- Operational Guidelines documents
- Supporting Forms and templates

All Work Programmes, Work Instructions, Reports, Registers and Records are generated in accordance with the governing procedures which in turn link to the SEMS, CMAPP and Company Policies.

3.3. Environmental Policy

FWM's Senior Management is committed to implementing the Environmental Policy into all Company activities. The commitment for responsible environmental management is expressed in the Environmental policy.

This is disseminated throughout the organisation to all personnel including key contractors. At each revision, the policy is discussed with all employees and feedback obtained. Fraser believes the awareness and understanding of the policy and our objectives - while showing active management commitment to environmental performance - promotes and enables ownership and responsibility.



ENVIRONMENTAL POLICY HSEQ-POL-002



POLICY COMMITMENTS

Fraser's vision is to be recognised as an environmentally responsible operator by our employees, stakeholders, clients, regulator and the public. Fraser aims to minimise the risk to the environment with a goal of zero harm.

To achieve this vision, we are committed to:

- maintaining an environmental management system which meets the requirements of ISO 14001
- conserving and protecting the environments in which we work
- meeting all obligations arising from environmental legislation, regulations, and standards relevant to our business
- being fully prepared to respond effectively to operational emergencies which might endanger the environment

To deliver on these commitments we will:

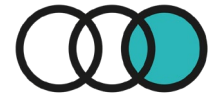
- assess the impact our activities may have on the environment and put protective measures in place
- design and select equipment optimised for operating conditions to minimise the risk of unplanned emissions
- promote strong environmental leadership and accountability at our work sites
- provide all equipment, trained and competent staff and any other resources required to enable these objectives to be met
- communicate environmental risks and mitigations to our project teams and sub-contractors to promote understanding and engagement
- ensure that all personnel are made aware of their individual obligations in respect of this Environmental Policy
- support the UK's NetZero ambitions using our skills, resources and expertise within the company in an effort to reach this goal
- measure and control the impacts of our activities on the environment, including our company carbon footprint
- set environmental objectives, track our performance and identify areas for improvement
- conduct regular reviews of our Environmental Policy to ensure it remains appropriate and suitable to our business
- maintain an audit schedule to monitor compliance with our environmental management system
- drive continual improvement by effective management of our systems and processes

Nick Ford
Managing Director

Nick Ford

11.05.2022

Figure 1 – Fraser Environmental Policy



3.4. Management Review & Audit

Formal Management reviews take place on an annual basis, at a minimum. These reviews are documented and assess the effectiveness of the management system in delivering the requirements of our Environmental Policy & objectives and ensure the correct focus and resource allocation as part of continuous improvement. In addition to the formal review, Fraser monitor the ongoing management system arrangements and Environmental performance at annual policy review and bi-monthly HSE review meetings, and quarterly Environmental committee meetings, as well as on a regular basis to ensure they reflect the needs of the organisation, clients and stakeholders.

Internal auditing is also used to examine how effectively each element of the management system is being applied. Results of these audits are included and scrutinised at management review, as well as at weekly integrated management system and performance review meetings. External audits are also performed as part of assessing our contractor's environmental management system and procedures, compliance with contractual and regulatory requirements, and determining their environmental performance – either at pre-contract award or on an ongoing suitability basis.

3.5. Verification

In addition to the internal audit programme and assessment of environmental performance undertaken internally, Fraser continue to maintain external certification to ISO 14001 as an integral part of our business and management system approach. This certification and evaluation applies across Fraser's management of; Well Engineering, Well Operations, Pipelines Engineering Asset Management, and Operatorship Services incorporating Full Well Life Cycle Management Services. The most recent surveillance audit was November 2022.

3.6. Fraser Objectives and Targets

Environmental objectives for the organisation begin at policy level and are continued through to supporting policies and procedures to ensure clear and consistent communications. Senior personnel and line managers are expected to contribute to the setting, monitoring and reporting on both corporate and project specific objectives, while demonstrating active support to their achievement.

When setting objectives and targets, Fraser ensure that these are consistent with the company's Environmental Policy, SEMS, and CMAPP, and take into account financial, operational and business requirements. Additional focus is also placed on assessing technological options, industry and stakeholder expectations such as strong environmental governance, and opportunities to further reduce environmental impacts as part of supporting UK Net Zero emissions and evolving opportunities.

The Environmental Policy objectives are assessed on a minimum of an annual basis, recorded and tracked formally as part of management system (Environmental Objectives & Targets Action Programme) arrangements, and also at frequent business reviews such as HSE dashboard, KPI and performance reporting reviews.

For individual projects, project-specific sets of HS&E Objectives & Targets are set at an early stage of the project and presented within Project HS&E Bridging documents or plans. These objectives and targets are monitored continuously through the project's duration including routine project progress meetings with client, contractor, and stakeholder personnel.



4. 2022 ENVIRONMENTAL OBJECTIVES

The Fraser environmental management objectives for 2022 were established to achieve the progressive commitments set out in our Environmental Policy Statement. During the year these objectives were subject to further review and support by both management and environmental committee personnel, with the 2022 Environmental Objectives achieved. The methodology is described in 3.6 above and continues to be applied to 2023 objectives.

2022 objectives:

- Comply with all legislation obligations to achieve zero non-conformances.
- To have zero unplanned discharges (PON1) submissions.
- Report all environmental related incidents, investigate and analyse them to prevent recurrence.
- Continue the review, communication, and internal audit of Fraser's SEMS to ensure a suitable and robust system is in place to manage Company operations in accordance with Company policies and statutory regulations.
- Undertake a minimum of one formal review of Fraser's Environmental Policy.
- Undertake an independent surveillance audit of our EMS to meet FWM's ISO 14001:2015 requirements.
- Ensure a robust Well Examination Scheme (WES) and Well Integrity (WIMS) Monitoring programme remains in place for all well operations.
- Ensure a robust Pipeline Integrity Monitoring Scheme (PIMS) is in place for pipeline operations.
- Ensure proactive communications are held with regulators and environmental stake holders prior to mobilisation of future campaigns.
- Hold annual FWM update and engagement with Regulatory Authorities (BEIS).
- Ensure environmental impact risk assessments are completed for all new major projects or activities.
- Ensure all necessary submissions are made to regulators to support the environmental consenting process for any well or pipeline operations, transitions or appointments.
- Review and update the FWM Environmental aspects and impacts register.
- Calculate and report baseline company emissions for 2022.



5. 2022 ENVIRONMENTAL PERFORMANCE

5.1. Overview of 2022 Activities

This section provides a summary of our 2022 performance. A summary of offshore environmental aspects and their associated emissions and impacts is also provided.

5.1.1. 2022 Performance Summary

Progress against our Objectives and Targets was subject to annual management review. All 2022 Objectives and Targets listed in Section 4.0 were broadly met with no non-compliances or spills incurred.

5.2. Production Well Operator Activities

During 2022 FWM (as Well Operator) continued to work closely with the asset Duty Holder (ODE) and Licensee (NEO Energy) in support of the Babbage Installation and Operations activities. The company also continued, as Well Operator, to work alongside NEO Energy (Licensee) for the Victoria subsea well.

In January 2022, Fraser Well Management assumed the Well and Pipeline Operator responsibilities for Bridge Petroleum’s (Licensee) Bardolino subsea well. This scope is in addition to Well Operatorship for the Galapagos (Darwin) subsea well.

During the reporting period, FWM worked closely with Bridge Petroleum on the Galapagos (Darwin) well decommissioning which was removed by Bridge Petroleum’s contractor, with FWM’s Well Operatorship responsibilities subsequently ceasing on 23rd December 2022.

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

A summary of assets, responsibility and OPEP arrangements for 2022 are defined in Table 1 below.

ASSET/WELL	RESPONSIBILITIES	ASSET STATUS	OPEP
Babbage Platform	<ul style="list-style-type: none"> Licensee – NEO Energy Duty Holder - ODE Well Operator - FWM 	Producing (Gas)	OPEP not required
Victoria Well	<ul style="list-style-type: none"> Licensee – NEO Energy Well Operator - FWM 	Shut-in and disconnected, awaiting abandonment	Consolidated OPEP (active)
Bardolino Well & Pipeline infrastructure	<ul style="list-style-type: none"> Licensee – Bridge Petroleum Well Operator – FWM Pipeline Operator - FIM 	Producing (Oil) currently shut-in awaiting intervention	Consolidated OPEP (active)
Galapagos (Darwin) Well	<ul style="list-style-type: none"> Licensee – Bridge Petroleum Well Operator - FWM 	Abandoned within reporting period	OPEP not required

Table 1 – Well Operator Activities

As described in section 1.0, the information provided in this report provides information on environmental matters associated with operations which were directly under Fraser control as



Well Operator in 2022. The following section does not include discharges and emissions at host facilities or from facilities which are operated under environmental consents held by the Installation Operator or Duty Holder; these discharges and emissions are included within the associated Company’s public statement.

As described above the vessel-based decommissioning of the Galapagos (Darwin) well (211/27a-14) was performed by Bridge Petroleum’s (Licensee) contractor (Mermaid/Exceed) in 2022, utilising the Olympic Challenger Offshore Construction Vessel (OSV). Fraser Well Management as Well Operator submitted the associated environmental consents and permits and performed offshore verification for the plug and abandonment operations.

Phase 3 abandonment operations (to OEUK AB3 status) of the 211/27a-14 well were carried out during various vessel visits between the 8th October and 30th November 2022.

5.2.1. Chemical Use

The total amounts of chemicals used and discharged in the abandonment activities on the Galapagos (Darwin) well are presented below. Of the 15 tonnes of chemicals that were used during this operation, 71% were OCNS category E chemicals that are labelled as posing little or no risk to the environment (PLONOR). Of the total chemicals used and discharged only 0.44% were classified as requiring substitution (SUB). A description of the strategies the suppliers are employing to replace these chemicals was provided to BEIS as part of the annual substitution reporting.

HQ/OCNS RANKING	ADDITIONAL LABEL	USED	DISCHARGED	USED
		(kg)	(kg)	%
	PLONOR	14,171	4,160	70.7%
GOLD	-	1,182	713	39.7%
GOLD	SUB	0	90.4	-

Table 2 – Galapagos (Darwin) Chemical Usage

5.2.2. Atmospheric Emissions

The total amounts of atmospheric emissions discharged during vessel work as part of abandonment activities on the Galapagos (Darwin) well are presented below.

ASSET/WELL	ACTIVITY	DATE	EMISSIONS (CO2e)
Galapagos (Darwin) Well	Well decommissioning (plug & abandonment)	Oct-Nov 2022	198 tonnes

Table 3 – Galapagos (Darwin) Emissions

5.2.3. Galapagos (Darwin) Emissions Non-Compliances or Discharges (Spills)

There were zero environmental non-compliances or unplanned discharges on the P&A activities on the Galapagos (Darwin) well

All FWM 2022 Objectives and Targets were met, including:

- There were no incidents that required a submission of a Petroleum’s Operations Notice 1 notification (PON 1)
- All chemicals used were authorised by the chemical permit
- The use and discharge levels of all chemical were within the authorised permit limits



5.3. Drilling Activities

In 2022 no drilling was undertaken in the UKCS by FWM as Well Operator.

For completeness, the following drilling activities summary information and headings have been retained, although no activity took place during the period.

5.3.1. Discharges to Sea

Chemical Use

Nothing to report.

Drilled Cuttings

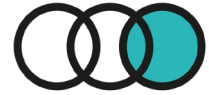
Nothing to report.

5.3.2. Atmospheric Emissions

Nothing to report.

5.3.3. Non-Compliances or Discharges (Spills)

Nothing to report.

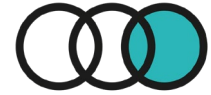


6. 2023 ENVIRONMENTAL OBJECTIVES

Key Environmental Objectives that have been set by Fraser for 2023 are as follows:

- Comply with all legislation obligations to achieve zero non-conformances.
- To have zero unplanned discharges (PON1) submissions.
- Report all environmental related incidents, investigate and analyse them to prevent recurrence.
- Continue the review, communication, and internal audit of Fraser's SEMS and Integrated Management System to ensure a suitable and robust system is in place to manage Company well and pipeline operations in accordance with Company policies and statutory regulations.
- Integrate Environmental Policy and top-level policy documentation with wider Company group
- Undertake a minimum of one formal review of Fraser's Environmental Policy.
- Undertake an independent surveillance audit of our EMS to meet FWM's ISO 14001:2015 requirements.
- Ensure a robust Well Examination Scheme (WES) and Well Integrity (WIMS) Monitoring programme remains in place for all well operations.
- Ensure a robust Pipeline Integrity Monitoring Scheme (PIMS) is in place for pipeline operations.
- Ensure proactive communications are held with regulators and environmental stake holders prior to mobilisation of future campaigns.
- Hold annual FWM update and engagement with Regulatory Authorities (OPRED BEIS).
- Ensure environmental impact risk assessments are completed for all new major projects or activities.
- Ensure all necessary submissions are made to regulators in a timely manner to support the environmental consenting process for any well or pipeline operations, transitions or appointments.
- Review and update the FWM Environmental aspects and impacts register.
- Calculate and report baseline company emissions for 2023.
- Continue to support and hold Environmental Committee meetings

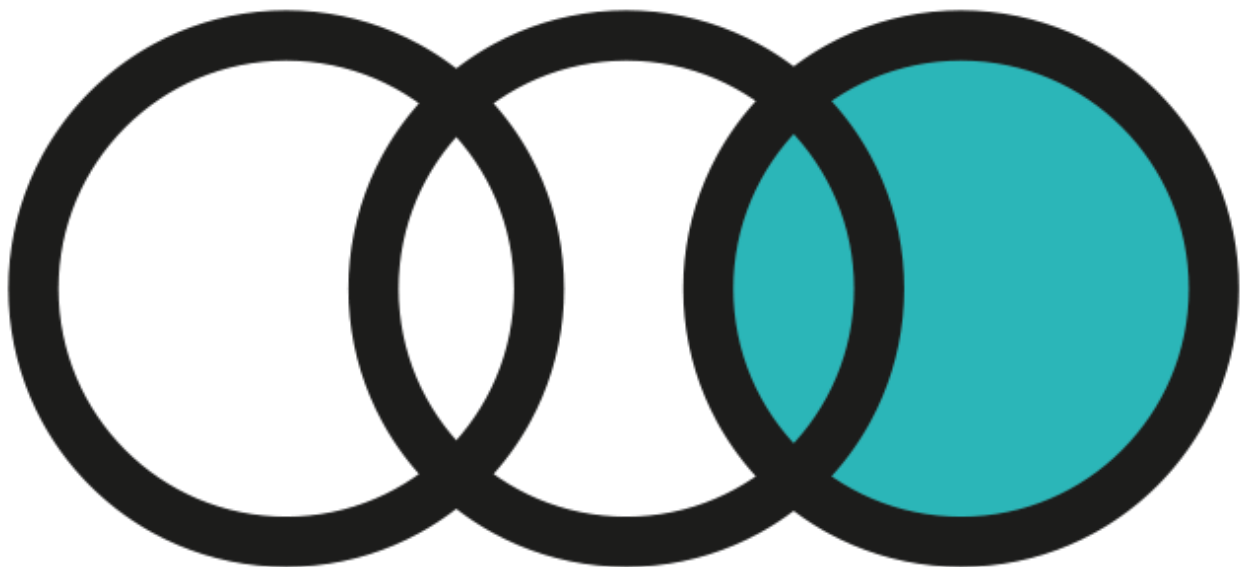
Additional Environmental objectives are contained and reviewed internally as part of the methodology described in 3.6.



7. DOCUMENT REVISIONS & GLOSSARY

REV. NO.	DETAILED DESCRIPTION OF CHANGE
0	Initial issue

ABBREVIATION	MEANING
ALARP	As Low As Reasonably Practicable
BEIS	Department of Business, Energy and Industrial Strategy
CMAPP	Corporate Major Accident Prevention Policy
EEMS	Environmental Emissions Monitoring System
EMS	Environmental Management System
FIM	Fraser Integrity Management
FWM	Fraser Well Management
GHG	Green House Gas
HSE	The Health and Safety Executive
ISO	International Standards Organisation
NSTA	North Sea Transition Authority
NUI	Normally Unattended Installation
MODU	Mobile Offshore Drilling Unit
O&T	Objectives & Targets
OCNS	Offshore Chemical Notification Scheme
OPEP	Oil Pollution Emergency Plan
OPRED	Offshore Petroleum Regulator for Environment and Decommissioning
OSPAR	Oslo and Paris Commission
PIMS	Pipeline Integrity Management System
PLONOR	Poses Little Or No Risk to the environment
PON1	Petroleum Operations Notice #1
SEMS	Safety and Environmental Management System
SEPA	Scottish Environmental Protection Agency
SH&E	Safety, Health and Environmental
UKCS	United Kingdom Continental Shelf
VOC	Volatile Organic Compounds
WES	Well Examination Scheme
WIMS	Well Integrity Management System



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The Turnkey Well Operator

Aberdeen | Great Yarmouth | Rotterdam











FWM Environmental Report - 2022 (220523)

Final Audit Report

2023-05-22

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