ODE Asset Management Limited

OSPAR Public Statement - 2024

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ode
Asset Management

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REVISION

Rev.	Date	Issued by	Approved by	Reason for revision
B05	May 2025	JO	NW	Update for Year 2024
B04	May 2024	JS	JO	Update for Year 2023
B03	May 2023	JS	JO	Update for Year 2022
B02	May 2022	JS	JO	Update for Year 2021
B01	May 2021	JS	JO	Issue for Information

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Abbreviations

ASEMS	Asset safety & environment management system
BAT	Best Available Technique
BMS	Business management system
DESNZ	Department for Energy Security & Net Zero
ECE	Environmentally critical element
EEMS	Environmental emissions monitoring system
EMS	Environmental management system
ETS	Emissions trading scheme
GHG	Greenhouse gas
HSE	Health, safety & environment
HSE	Health & Safety Executive
IPPC	Integrated pollution prevention & control
MEI	Major Environmental Incident
NPAI	Not permanently manned installation
NSTA	North Sea Transition Authority (formerly Oil & Gas Authority)
NUI	Normally unmanned installation
ODE AM	ODE Asset Management Limited
OSPAR	Oslo Paris Agreement
PON1	Petroleum Operations Notification 1 (accidental spill notification)
SEMS	Safety & environmental management system
SHEQ	Safety, health, environment & quality
SNS	Southern North Sea
te	Metric tonne
UKCS	United Kingdom Continental Shelf

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 and Net Zero (DESNZ) 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 DESNZ by 1st June of each year.

2 REPORT OBJECTIVE

In accordance with the requirements of OSPAR Recommendation 2003/5, this document reports on the environmental performance of ODE Asset Management Limited's (hereafter ODE AM) UK Continental Shelf (UKCS) operated offshore activities during 2024. It is focused on environmental issues associated with operations which were directly under the control of ODE AM and demonstrates how management systems that are in place seek to continuously improve environmental performance.

In 2024 ODE AM continued Installation Operator and Pipeline Operator responsibilities in the Southern North Sea (SNS) for:

- the Babbage Not Permanently Attended Installation (NPAI) platform operated on behalf of New European Offshore Energy Limited (NEO);
- the Tolmount Normally Unattended Installation (NUI) and export pipeline operated on behalf of Harbour Gathering System Limited (HGSL); and
- the Blythe NUI and export pipeline operated on behalf of CalEnergy Resources (CAL).

In addition, ODE AM continued in the role of Duty Holder and Pipeline Operator for the following offshore assets which were not in production during 2024:

- the Kilmar and Garrow NUI platforms (collectively known as Tors) & Wenlock platform operated on behalf of Waldorf Production Limited (Waldorf). The Installation and Pipeline Operatorship of these installations was transitioned to a new Operator, Petrodec, in December 2024; and,
- the Southwark NUI and export pipeline operated on behalf of CAL.

It is noted that whilst Tors & Wenlock have ceased production operations, production at Southwark NUI is yet to commence.

3 ABOUT ODE AM

ODE AM is a private company and an integral part of the DORIS UK Group, celebrating 60 years in the Oil & Gas business in 2025. ODE AM is recognised as a worldwide leader in offshore solutions for subsea, pipelines, fixed and floating facilities and renewables.

ODE AM is headquartered in Great Yarmouth with business centres in Great Yarmouth and Aberdeen. The Great Yarmouth base has been established for over two decades providing direct UK SNS asset management support including offshore management, operations, integrity management and logistical support. In 2019 to physically provide closer local links, and to further facilitate expansion of Installation Operator/Operations and Engineering offerings, new offices were established in Aberdeen to further support North Sea operations.

ODE AM's principal objective is to achieve maximum value from every asset with zero harm to people or the environment and to comply with regulations. ODE AM places the highest level of emphasis on Health, Safety and Environmental performance. Consideration of HSE forms an integral component of all activities from planning to operations, particularly with respect to minimising hazards whilst ensuring full compliance with regulatory requirements.

For further Company information please refer to our website: https://www.ode-ltd.co.uk

4 ENVIRONMENTAL MANAGEMENT SYSTEM

ODE AM is fully committed to working in an environmentally responsible manner to ensure that work is executed without accident or incident and to the requirements of our clients and applicable regulations. Underpinning our environmental commitment is the business management system which ensures that all work is undertaken correctly and in accordance with implemented systems and procedures. Doing work correctly first time ensures meeting environmental objectives. ODE AM's approach to environmental management is endorsed by all senior management. This underpins the positive environmental culture from senior management to operational support teams. Working in accordance with the management systems and controls is a condition of employment with ODE AM.

The ODE AM Safety & Environmental Management System (SEMS) is a component of the overall integrated Business Management System (BMS). The BMS incorporates a Health, Safety, Environmental and Quality (HSEQ) Management System which is operated to satisfy the following key commitments:

- Considering the environment in our business decisions and minimising our adverse impact on the environment;
- Not harming anyone as a result of our business activities;
- Not damaging the health of anyone as the result of our business activities; and,
- Establishing, maintaining, monitoring and continually improving our HSEQ Management Systems.

All facilities are managed and operated by ODE AM in accordance with an Asset Safety & Environmental Management System (ASEMS) ensuring a consistent and proven framework of procedures, operating practices, and Integrated Safe Systems of Work.

Each ASEMS is constructed around key elements of the BMS including policies, systems, procedures, and guidance to allow ODE AM and its contractors to operate its assets in accordance with legislation and to meet the ODE HSEQ Policy. In this way each ASEMS is an integral part of ODE Group's overall BMS.

The structure and content of the BMS ensures alignment with, and enables certification to, the requirements of ISO 9001:2015 Quality management system, ISO 14001:2015 Environmental management system and ISO 45001:2018 Occupational health and safety management system. Existing certifications under these standards have recently been revalidated through external certification audit and will remain valid until May 2027. The appointment of ODE AM as a Pipeline and Installation Operator for the assets described has not been objected to by NSTA, DESNZ or the HSE.

The ODE AM HSEQ policy lists commitments to HSEQ and the current version is presented Figure 1. ODE AM is committed to continually improving all core business systems and does so through regular Management reviews, updates, and feedback. The Plan, Do, Check, Act cycle (Figure 2) enables continual improvement and a structured, risk-based approach to manage business processes and to ensure the organisation is adequately resourced.

Key procedures included within the BMS governing the development of each ASEMS include the following:

- SHEQ-8004 Identification of Environmental Aspects and Significance Evaluation
- SHEQ-8024 Environmental Data Reporting Procedure
- SHEQ-8052 Waste Management Procedure
- SHEQ-8073 Oil Pollution Emergency Plan

Asset-specific procedures and plans are prepared as necessary to ensure compliance with overall objectives.

In addition to the SHEQ series of relevant procedures, the ODE AM Maintenance Management System includes the requirement to identify and maintain Environmentally Critical Elements (ECEs) as necessary to ensure the prevention of a Major Environmental Incident (MEI) where these are identified.

HSEQ POLICY

ODE Asset Management (ODE AM) provide design, engineering, project management and procurement services including the management systems in support of operational support and construction site management to the international oil, gas, renewable and energy Industries. Including onshore management of offshore / site activity, asset integrity management and installation / pipeline operator.

We recognise that our long-term business success depends on our ability to effectively manage major accident hazards to protect the people that work for and with us, those that are affected by our activities and the environment in which we work, while continually improving the quality of our services and products.

We realise that the standard we expect can only be delivered by taking personal responsibility for HSEQ and working together, by setting clear objectives and maintaining open communication channels.

Our commitment to **HSEQ** is a core value of the business and to deliver it we will:

- Actively promote HSEQ as a **core value** by 'visible felt leadership' from all personnel in positions of authority within our business.
- Practise the **7 Quality Management Principles**: customer focus, leadership, engagement of people, process approach, improvement, evidence-based decision making and relationship management.
- Comply with all their **legal, regulatory, and other requirements,** and work to adopt industry best practice applicable in the countries in which we operate.
- Set **performance objectives**, measure results, assess and continually improve processes, services, and product quality, by implementing an effective and externally certified **Business Management System (BMS).**
- Ensure **effective and proactive management,** to identify, reduce, control, monitor, and review to eliminate hazards.
- Ensure that **sufficient resources** are provided and that all employees, contractors and service providers' personnel are **trained and competent** to undertake their work safely.
- Promote the health and wellbeing of our workforce and take action to prevent and control **work related ill health.**
- Ensure that the principles of **'safe by design'**, **'human factors'** and '**reduced environmental impact'** are embedded in all aspects of our service, including design, engineering and operations and maintenance.
- Understand and consider how our activities **impact the environment** and work to minimise that impact, by preventing pollution, reducing our natural resource consumption, minimising emissions and the reduction, reuse, and recycling of waste.
- We are **committed to achieve net target zero for carbon emissions by 2030** and will develop a strategy to cover our full value chain which we will align to a recognised Net Zero Standard.
- Undertake regular **emergency drills and exercises** to test our capability to respond quickly and effectively to any emergency or abnormal working condition.
- Report and investigate all **health, safety, and environmental incidents**, establish root causes, and take appropriate actions to prevent recurrence.
- **Consult and communicate openly** with interested parties (including workers' representatives) and determine and remove any barriers, to ensure that our policies, standards, expectations, and performance are understood.
- **Review this Policy annually** for continued suitability.

All employees, contractors and service providers working at ODE AM controlled locations or performing activities on behalf of ODE AM at other sites are required to work in accordance with the requirements of the BMS or other appropriate systems that meet or exceed this standard and to intervene in any situation that has the potential to cause harm to an individual, asset, the environment, or our reputation.

Sandy Reid, Managing Director

Date: 01/01/2025
Review date: 31/12/2025

SPBM-1-1002

Figure 1 ODE AM HSEQ Policy

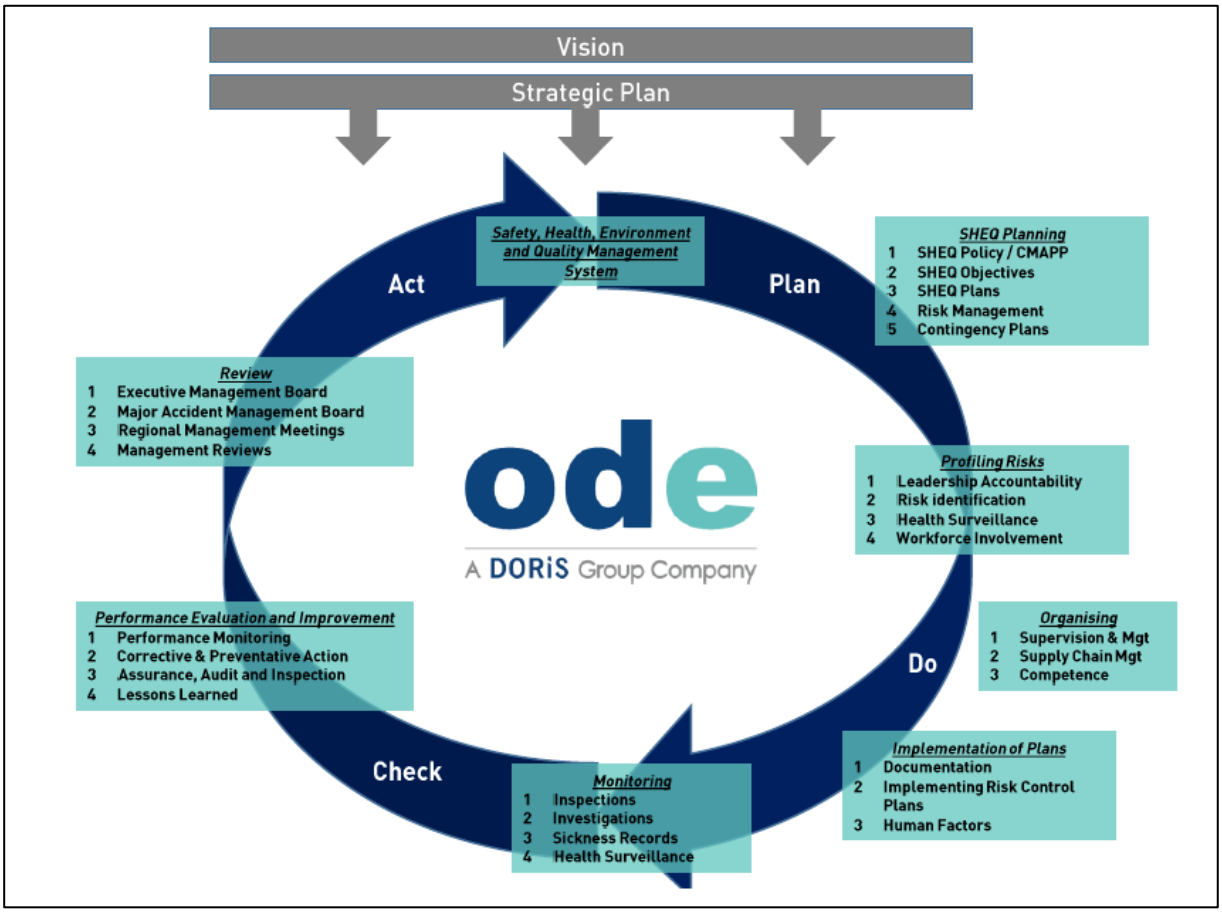

Figure 2 ODE Group Management Cycle - Plan, Do, Check, Act

5 2024 ENVIRONMENTAL PERFORMANCE

5.1 Overview of 2024 Activities

In 2024 ODE AM continued Installation Operator and Pipeline Operator responsibilities in the SNS for:

- the Babbage NPAI platform operated on behalf of NEO;
- the Tolmount NUI and export pipeline operated on behalf of HGSL; and,
- The Blythe NUI and export pipeline operated on behalf of CAL.

In addition, ODE AM continued in the role of Duty Holder and Pipeline Operator for the following offshore assets which were not in production during 2024:

- the Tors (comprising Kilmar and Garrow platforms) & Wenlock platforms operated on behalf of Waldorf. The Installation and Pipeline Operatorship of these installations was transitioned to a new Operator, Petrodec, in December 2024; and,
- the Southwark NUI and export pipeline operated on behalf of CAL.

It is noted that whilst Tors & Wenlock have ceased production operations, production at Southwark NUI is yet to commence.

5.2 Management and Recording of Applicable Environmental Aspects

An ASEMS is in place for each of the described assets. These mandate the preparation and review of asset-specific environmental aspect registers in accordance with the requirements of the ODE AM Identification of Environmental Aspects and Significance Evaluation Procedure. Planned activities and potential unplanned events (e.g., accidental releases) associated with the operations have been assessed and recorded for environmental risk against the ODE AM corporate risk matrix.

Development and maintenance of the environmental aspect registers for all assets has involved review of the following areas to ensure all aspects have been captured for all planned and unplanned operation events:

- Work process flow and procedures
- Legal requirements/ non-statutory guidance notes
- General specifications and particular specifications
- Observations made during site inspections
- Records of complaints and/or non-compliance
- Past monitoring records
- Records for Management reviews and/or environmental audits
- Permit application data

- Environmental approval documents (e.g. Environmental Impact Assessment documents)
- Outputs from risk identification workshops and studies

Against this background environmental aspects have been classified into the following categories:

- Resources utilisation (including use of raw materials, energy, etc.)
- Waste management
- Air emissions
- Discharges to sea
- Noise and vibration nuisance
- Contamination (land/sea floor)
- Indirect impacts caused by suppliers, contractors, or customers; and
- Others (flora & fauna, visual impact; community impact, transportation impact, nuisance, site security)

5.2.1 Babbage NPAI Installation

A total of 22 potential environmental aspects have been identified and assessed for the Babbage NPAI, of which 20 were considered applicable to operations in 2024 (the non-applicable aspects were associated with micro-turbine operations and the produced water system, both of which remained out of commission throughout the year). All applicable aspects have been assessed as an acceptable Moderate or Minor environmental risk following the application of mitigation and control measures. No unacceptable High, or Very High, environmental risks have been identified. Associated environmental risk reduction activities included:

- Compliance, monitoring and reporting in accordance with all environmental permits, consents and other regulatory requirements;
- Liaison with environmental regulators and stakeholders;
- Coordination and liaison with the Babbage Licensee (NEO Energy);
- Installation-specific emergency response plans in place;
- Oil Pollution Emergency Plan in place; and,
- All diesel and chemical bunkering operations undertaken in daylight and in good weather conditions (i.e., when manned).

5.2.2 Tors & Wenlock

5.2.2.1 Wenlock NUI

A total of 21 environmental aspects have been identified and assessed for the Wenlock NUI, all of which were applicable to varying degrees throughout 2024 despite the cessation of production. All applicable aspects have been assessed as an acceptable Moderate or Minor environmental risk following the application of mitigation and control measures. No unacceptable High, or Very High, environmental risks have been identified.

5.2.2.2 Tors (Comprising Garrow and Kilmar NUIs)

From an environmental perspective, the pipeline-linked Garrow and Kilmar NUIs are similar in terms of the aspects presented. An environmental aspects register has been prepared and maintained for each of the Garrow and Kilmar NUIs. The registers contain a total of 21 environmental aspects which were applicable to varying degrees according to the operational status of the facilities.

All environmental risks ascribed to the identified aspects have been assessed as an acceptable Moderate or Minor environmental risk, following the application of mitigation and control measures. No unacceptable High, or Very High environmental risks have been identified. Associated environmental risk reduction measures are the same as described above for the Wenlock NUI.

5.2.3 Tolmount NUI

A total of 24 potential environmental aspects have been identified and assessed for the Tolmount NUI all of which continued to be considered applicable to operations following the commencement of production in 2022. All these aspects have been assessed as an acceptable Moderate or Minor environmental risk following the application of mitigation and control measures. No unacceptable High, or Very High, environmental risks have been identified.

5.2.4 Blythe NUI

A total of 21 potential environmental aspects have been identified and assessed for the Blythe NUI, all of which were considered applicable following the commencement of operations in 2023. All aspects have been assessed as an acceptable Moderate or Minor environmental risk following the application of mitigation and control measures. No unacceptable High, or Very High, environmental risks have been identified.

5.2.5 Environmental Risk Reduction Measures

To minimize environmental risks identified, and to ensure these remain within acceptable levels, a range of common measures have been applied across all assets. These include:

- Compliance, monitoring and reporting in accordance with all environmental permits, consents and other regulatory requirements;
- Liaison with environmental regulators and stakeholders;
- Coordination and liaison with the Licensee;
- Installation-specific emergency response plans in place;

- Oil Pollution Emergency Plan in place; and
- All diesel and chemical bunkering operations undertaken in daylight and in good weather conditions (i.e., when manned).

5.4 Babbage NPAI Environmental Performance

The location of the Babbage NPAI Installation is presented in Figure 3.

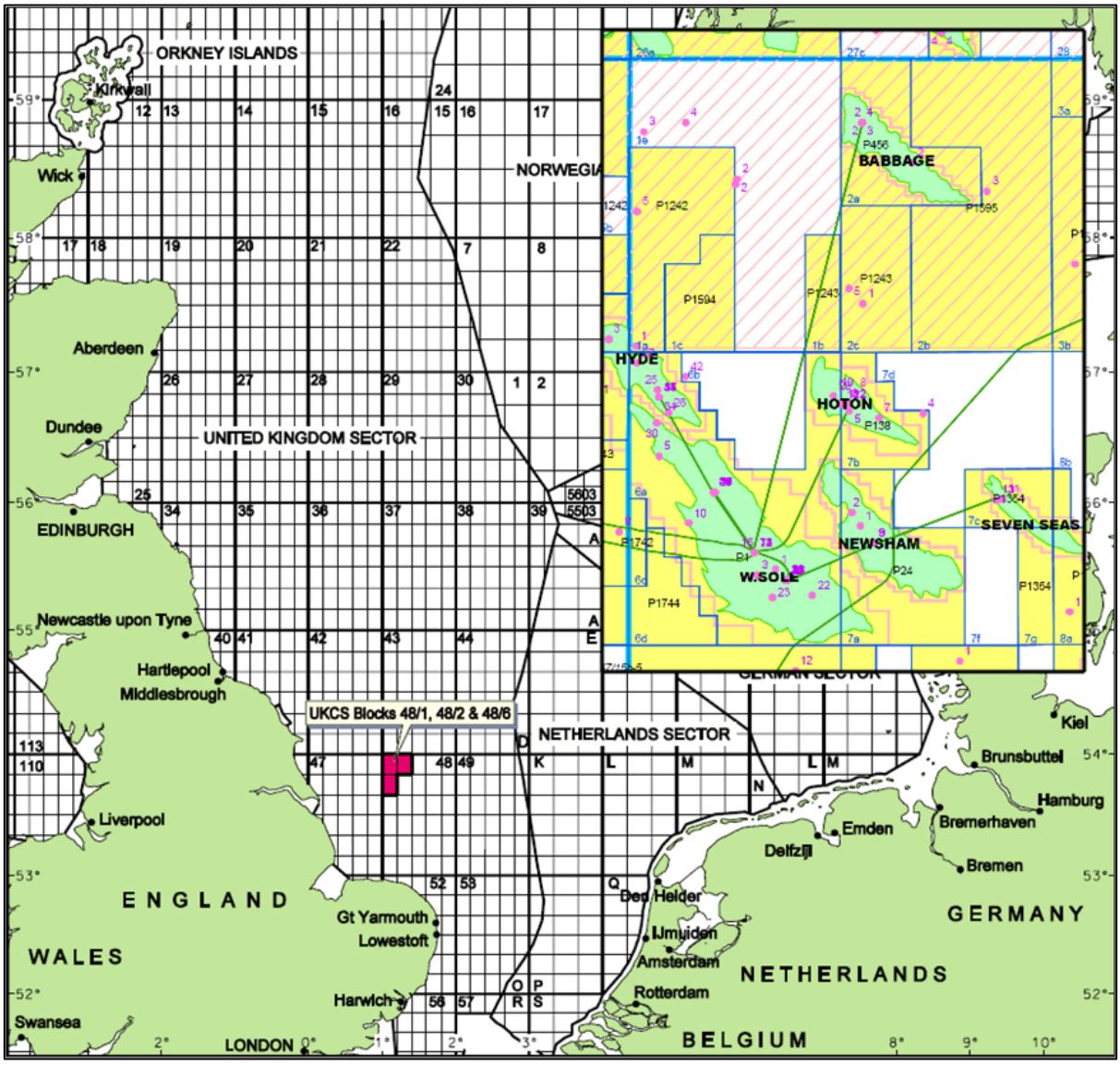

Figure 3 Babbage Field and Platform Location

ODE AM monitors and reports on atmospheric emissions, the use and discharge of chemicals, the disposal of waste and hydrocarbon and chemicals spill incidents for the Babbage NPAI Installation. This section presents the information that was reported via the online Environmental and Emissions Monitoring System (EEMS) for operations during 2024.

5.4.1 Atmospheric Emissions

Greenhouse gas (GHG) emissions are generated at the Babbage platform due to power generation (running of diesel generator) and cold venting periodically required for operational and maintenance reasons. GHG emissions are below the threshold for both Integrated Pollution Prevention & Control (IPPC) permitting and Greenhouse Gas Emissions Trading Scheme (ETS) requirements. Total GHG platform emissions for 2024, comprising diesel combustion and cold venting of reservoir gas, were 556.8 te CO_2e.

5.4.2 Discharge of Chemicals to Sea

The Babbage platform employs several chemicals to assist the process, maintain system integrity and support maintenance operations. Chemicals are controlled under permit subject to the Offshore Chemical Regulations 2002. Chemicals included in the permit for year 2024 are quantified below, noting that whilst chemicals were used, zero discharge to sea occurred.

Chemical			Used, kg	Discharged, kg
Name	**Function Group**	**DTI Code**		
AFMR20400A	ANTIFOAMHYD	26839	585	0.0
BIOC41000A	BIOCIDE	27434	56	0.0
CORRTREAT 15571	CORRINIHIB	27900	18,985	0.0
FOAM20502A	OTHER	27616	5,250	0.0
Hydrosure HD-5000	BIOCIDE	24858	45	0.0
Methanol	GASHYDRINHIB	28856	45,494	0.0
Potassium chloride	SHALEINHIB	26708	85,900	0.0
SOBO S GOLD 08	DETERGENT	23125	14	0.0

5.4.3 Discharge of Oil under OPPC Regulations

The Babbage platform holds an oil discharge permit under the OPPC regulations to allow for controlled discharge of treated produced water to the sea. However, for the whole of 2024 the produced water treatment system was not in service and no discharges to sea occurred.

5.4.4 Waste

Wastes generated at the Babbage platform were all transported to shore for subsequent management by a licensed waste contractor in accordance with regulation and ODE AM waste management procedures. The fate and characteristics of generated wastes in 2024 were:

- Recycled – 5.823 te
- Waste to energy – 8.741 te
- Treatment – 10.43 te
- Landfill 0.01 te
- Special – 14.42 te
- Non-hazardous – 11.12 te

5.4.5 Accidental Environmental Events

There were no instances in 2024 where any hydrocarbon or chemical was discharged to sea requiring a PON1 report. There were 2 PON10 notifications made to OPRED to report a loss of primary power in 2024.

5.5 Tors & Wenlock Environmental Performance

5.5.1 Wenlock NUI

The location of the Wenlock NUI is presented in Figure 4, below.

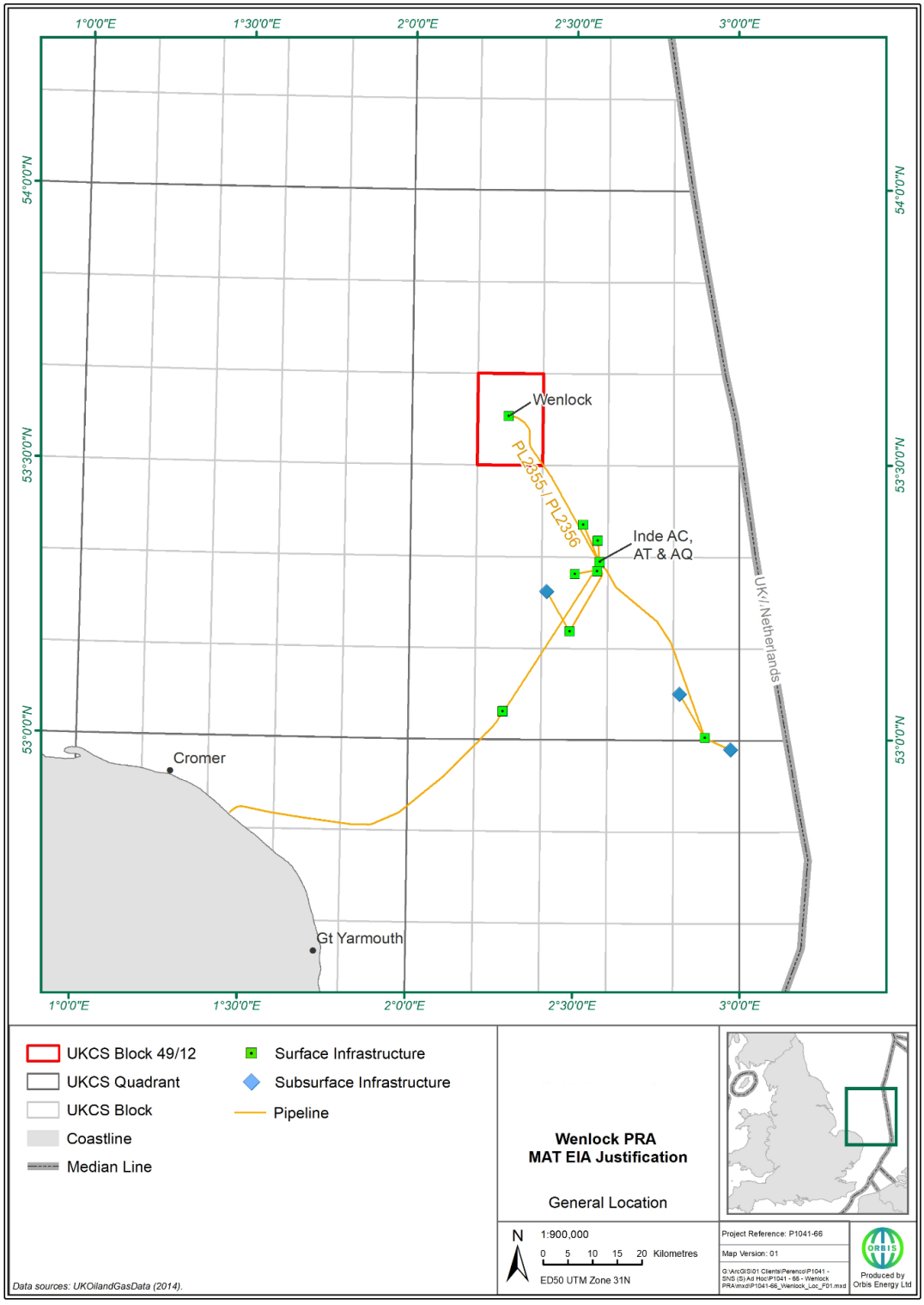

Figure 4 Wenlock Platform Location

5.5.1.1 Atmospheric Emissions

Following the cessation of production at Wenlock emissions were not generated in support of production operations but were required in support of integrity assurance and navigation aids. Historically at Wenlock GHG emissions have been well below the threshold for both Integrated Pollution Prevention & Control (IPPC) permitting and Greenhouse Gas Emissions Trading Scheme (ETS) requirements. Total GHG platform emissions for 2024 from diesel combustion were 68.6 te CO2e.

5.5.1.2 Discharge of Chemicals to Sea

Since production ceased at the Wenlock NUI the platform chemical permit no longer includes chemicals required to support production that are controlled under the Offshore Chemical Regulations 2002. The remaining chemical for 2024 is a detergent used intermittently for maintaining platform integrity as shown below, however this chemical was not required to be used during 2024 despite inclusion on the related permit.

Chemical			Used, kg	Discharged, kg
Name	**Function Group**	**DTI Code**		
SOBO S GOLD 08	DETERGENT	23125	0.0	0.0

5.5.1.3 Waste

Wastes generated at the Wenlock NUI were all transported to shore for subsequent management by a licensed waste contractor in accordance with regulation and ODE AM waste management procedures. The fate and characteristics of generated wastes during 2024 were:

- Recycled – 2.57 te
- Waste to energy – 1.14 te
- Treatment – 0.55 te
- Special – 2.65 te
- Non-hazardous – 1.61 te

5.5.1.4 Accidental Environmental Events

No accidental environmental events occurred at the Wenlock NUI during 2024.

5.5.2 Kilmar NUI

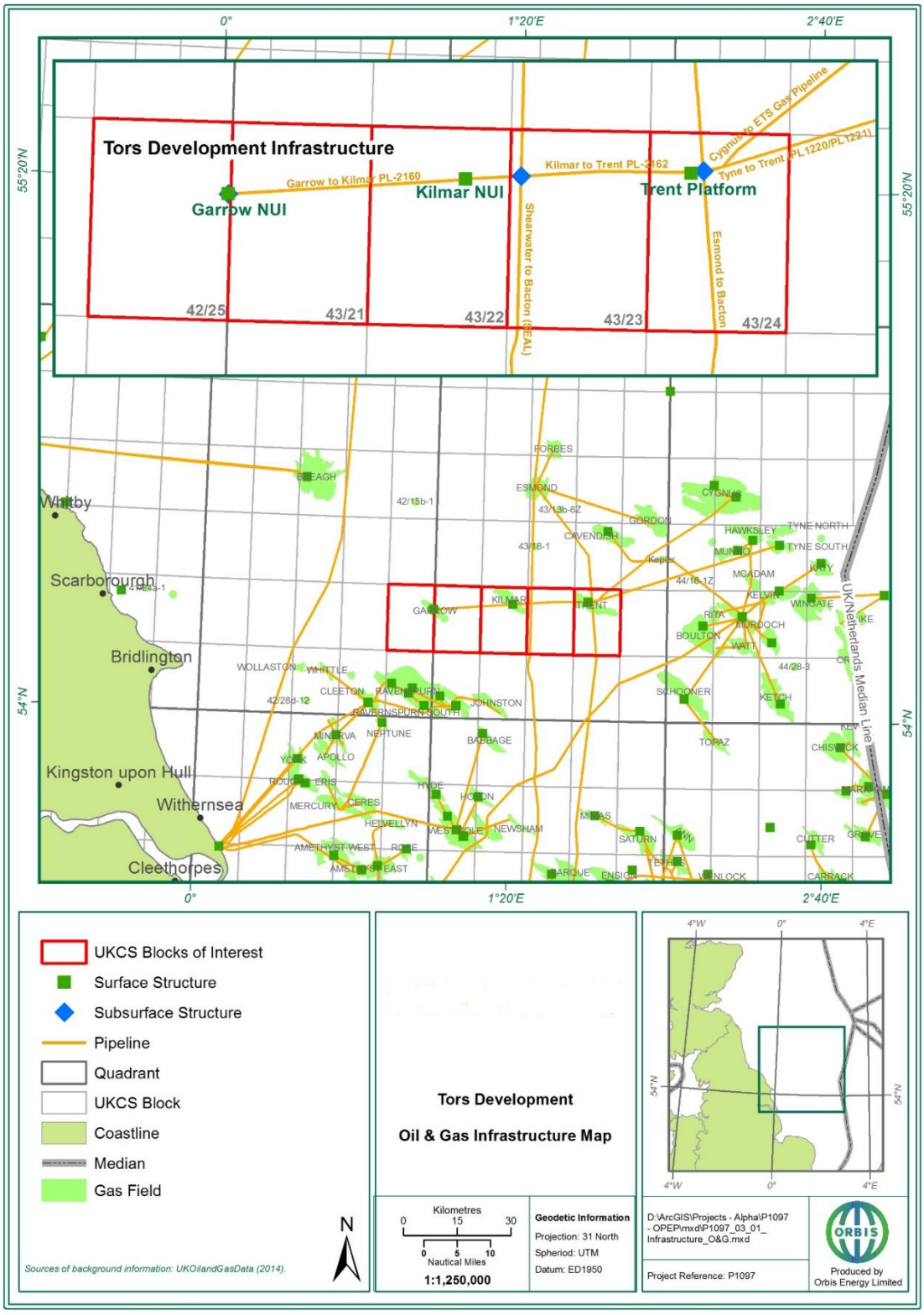

Figure 5 Tors (Comprising Kilmar & Garrow NUIs) Location

5.5.2.1 Atmospheric Emissions

Greenhouse gas (GHG) emissions were generated at the Kilmar platform due to power generation (i.e. running of diesel generator) despite the cessation of production to enable inspections and integrity assurance activities. GHG emissions are well below the threshold for both Integrated Pollution Prevention & Control (IPPC) permitting and Greenhouse Gas Emissions Trading Scheme (ETS) requirements. Total GHG platform emissions for 2024 from diesel combustion were 79 te CO_2e.

5.5.2.2 Discharge of Chemicals to Sea

Since production ceased at the Kilmar NUI the platform chemical permit no longer includes chemicals required to support production that are controlled under the Offshore Chemical Regulations 2002. The remaining chemical for 2024 is a detergent used intermittently for maintaining platform integrity as shown below, however this chemical was not required to be used during 2024 despite inclusion on the related permit.

Chemical			Used, kg	Discharged, kg
Name	**Function Group**	**DTI Code**		
SOBO S GOLD 08	DETERGENT	23125	0	0

5.5.2.3 Discharge of Oil under OPPC Regulations

The Kilmar platform holds an oil discharge permit under the OPPC regulations to allow for discharge of treated produced water to the sea. However, since October 2021 the produced water treatment system has not been in service and no discharges to sea occurred during 2024.

5.5.2.4 Waste

Wastes generated at the Kilmar NUI were all transported to shore for subsequent management by a licensed waste contractor in accordance with regulation and ODE AM waste management procedures. The fate and characteristics of generated wastes during 2024 were:

- Recycled – 0.24 te
- Waste to energy – 0.62 te
- Treatment – 0.0 te
- Special – 0.32 te
- Non-hazardous – 0.54 te

5.5.2.5 Accidental Environmental Events

A PON1 reportable environmental incident occurred at the Kilmar NUI during 2024, where a diesel bunkering hose parted and there was a loss of 9 litres of diesel to sea.

5.5.4 Garrow NUI

The location of the Garrow NUI is indicated in Figure 5. No production took place during 2024.

5.5.4.1 Atmospheric Emissions

GHG emissions are generated at the Garrow platform due to power generation (i.e. running of diesel generator) which is still required despite production having ceased. GHG emissions are well below the threshold for both IPPC permitting and ETS requirements. Total GHG platform emissions for 2024 from diesel combustion were 80.4 te CO_2e.

5.5.4.2 Discharge of Chemicals to Sea

The Garrow NUI employs one chemical controlled by permit under the Offshore Chemical Regulations 2002. This is a detergent required to support periodic maintenance activities. No chemicals are currently required in relation to production. The chemical included in the permit for year 2024 is quantified below.

Chemical			Used, kg	Discharged, kg
Name	**Function Group**	**DTI Code**		
SOBO S GOLD 08	DETERGENT	23125	0	0

5.5.4.3 Waste

Wastes generated at the Garrow NUI were all transported to shore for subsequent management by a licensed waste contractor in accordance with regulation and ODE AM waste management procedures. The fate and characteristics of generated wastes during 2024 were:

- Recycled – 1.15 te
- Waste to energy – 1.57 te
- Treatment – 0.0 te
- Special – 1.89 te
- Non-hazardous – 0.83 te

5.5.4.4 Accidental Environmental Events

No accidental environmental events occurred at the Garrow NUI during 2024.

5.7 Tolmount NUI Environmental Performance

The location of the Tolmount NUI is presented in Figure 6.

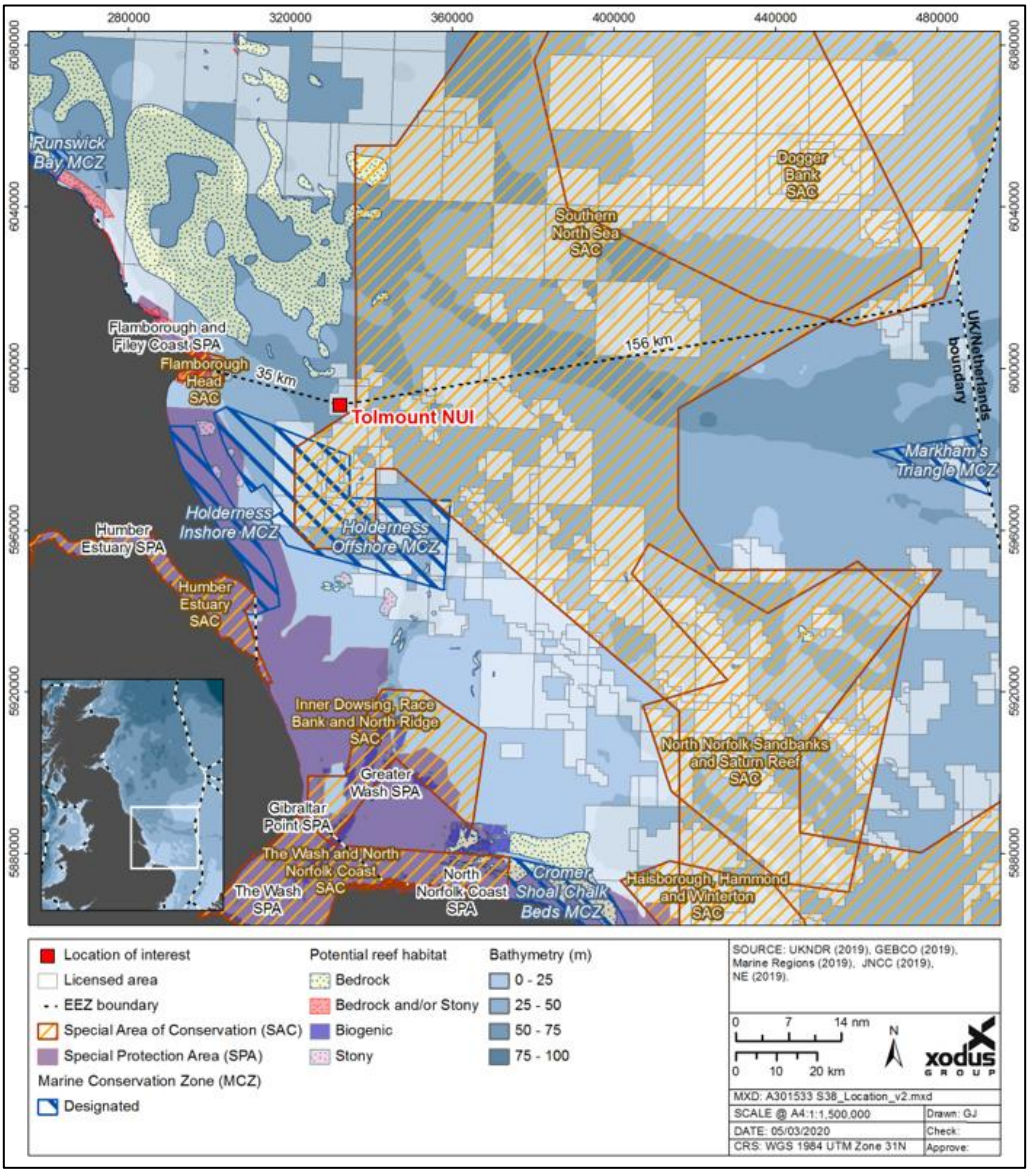

Figure 6 Tolmount NUI Location

5.7.1 Atmospheric Emissions

GHG emissions are generated at the Tolmount platform due to power generation (running of diesel generator and gas microturbine) and cold venting periodically required for operational and maintenance reasons. There is no cold venting as part of normal operations. GHG emissions are below the threshold for both IPPC permitting and ETS requirements. Total GHG platform emissions for 2024, comprising diesel combustion, fuel gas combustion in the micro gas turbine, and cold venting of reservoir gas, were 963.4 te CO_2e.

5.7.2 Discharge of Chemicals to Sea

The Tolmount platform employs several chemicals to assist the process, control the Tolmount East tie-back well, maintain system integrity and support maintenance operations. Chemicals are controlled under permit subject to the Offshore Chemical Regulations 2002. Chemicals included in the permit for year 2024 are quantified below. Methanol and monoethylene glycol are classed as posing little or no risk to the environment (PLONOR).

Chemical			Used, kg	Discharged, kg
Name	**Function Group**	**DTI Code**		
CORR10020A	CORRINIHIB	26561	347	347
Methanol	GASHYDRINHIB	29393	20,414	20,414
Monoethylene Glycol (All dilutions)	GASHYDRINHIB	29709	0	0
Oceanic HW443R	HYDFLUID	3930	380	380
SCAL16662F2	SCALEINHIBIT	28729	13628	13628
SOBO S GOLD 08	DETERGENT	23125	26	26

5.7.3 Discharge of Oil under OPPC Regulations

The Tolmount NUI commenced operation of its produced water treatment system in June 2022 following the commencement of production operations. Discharge of treated produced water to sea is permitted under consent and continued during 2024. The produced water treatment system has been designed and approved according to the principles of best available technique (BAT) to minimize discharge of the reservoir condensate to sea. During 2024 the system operated as follows:

- Total volume of water treated – 1759.4 m^3
- Days on stream – 342
- Weight of oil discharged to sea – 0.02 te

5.7.4 Waste

Wastes generated at the Tolmount platform were all transported to shore for subsequent management by a licensed waste contractor in accordance with regulation and ODE AM waste management procedures. The fate and characteristics of generated wastes in 2024 were:

- Recycled – 5.97 te
- Waste to energy – 16.04 te
- Treatment – 2.38 te
- Special – 18.36 te
- Non-hazardous – 6.03 te

5.7.5 Accidental Environmental Events

Four OPPC non-conformance notifications were raised during 2024. However, none of these were in connection with accidental loss of containment leading to discharge of oil to sea: all

were in fact related to the analyzed concentration of treated produced water exceeding the permit concentration of 15 mg/l for oil in water (OIW) discharge to caisson. Subsequent investigations showed that concentrations were elevated primarily because of variations in OIW concentrations at the inlet of the produced water treatment (PWT) system following well start-up, and variability in production profiles. The PWT system itself was shown to be functioning according to design intent. The non-compliances were related to OIW concentrations, rather than loading. In terms of loading, non-compliant discharge of oil to sea (within treated produced water) totaled 0.012 te (12 kg) over the whole of 2024.

5.8 Blythe NUI Environmental Performance

The location of the Blythe NUI is presented in Figure 7.

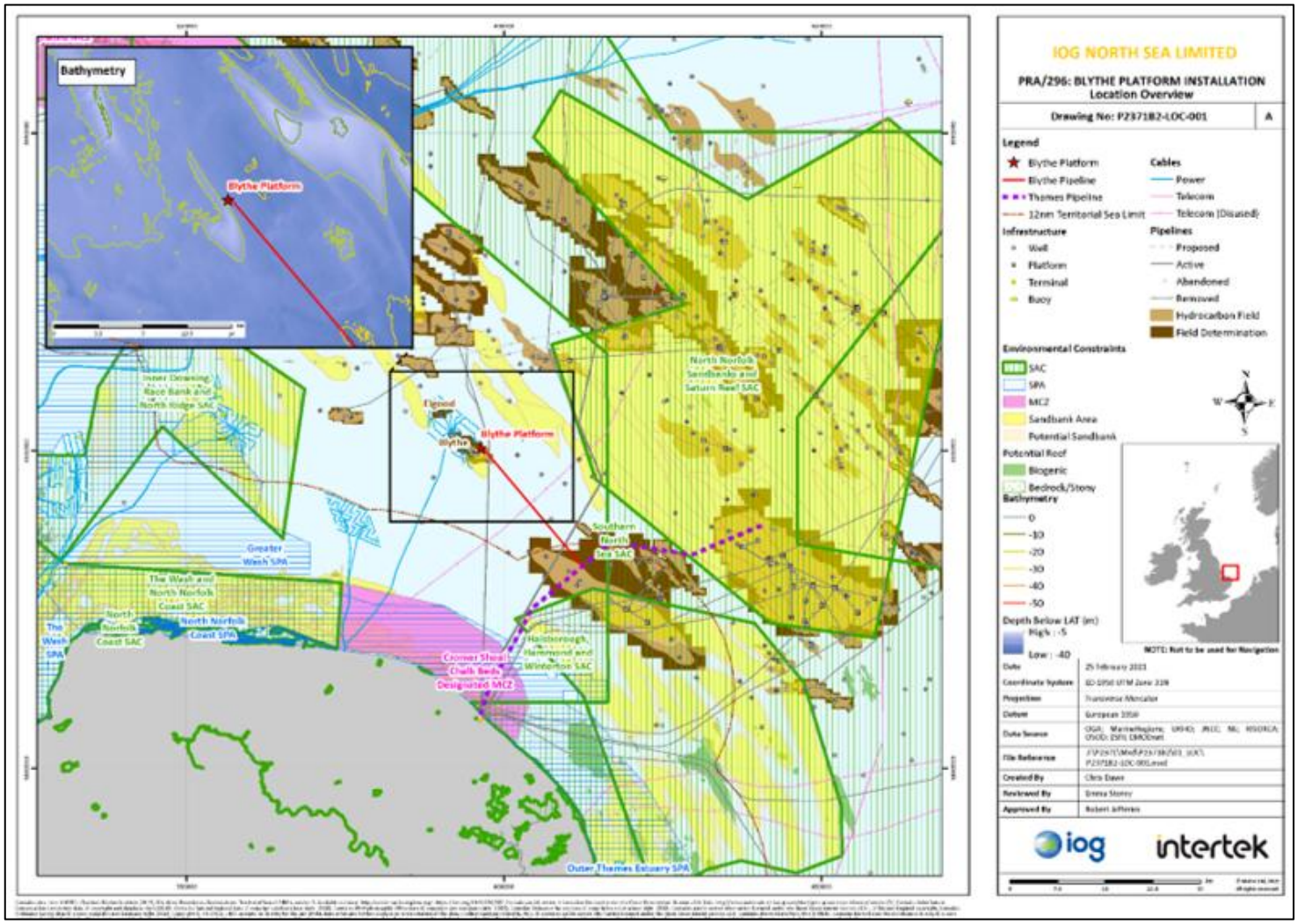

Figure 7 Blythe NUI Location

5.8.1 Atmospheric Emissions

Greenhouse gas (GHG) emissions are generated at the Blythe platform due to power generation (running of diesel generator) and cold venting periodically required for operational and maintenance reasons. GHG emissions are below the threshold for both Integrated Pollution Prevention & Control (IPPC) permitting and Greenhouse Gas Emissions Trading Scheme (ETS) requirements. Total GHG platform emissions for 2024, comprising diesel combustion and cold venting of reservoir gas during maintenance, were 630.0 te CO_2e.

5.8.2 Discharge of Chemicals to Sea

The Blythe platform employs several chemicals to assist the process, maintain system integrity and support maintenance operations. Chemicals are controlled under permit subject to the Offshore Chemical Regulations 2002. The only chemical that is discharged to sea is hydraulic fluid required for control of the Elgood tie-back well, which was offline during 2024.

Chemical			Used, kg	Discharged, kg
Name	Function Group	DTI Code		
CRW85689	CORRINIHIB	23422	2,116	0
Methanol (all dilutions)	GASHYDRINHIB	28856	109,683	0
Mono Ethylene Glycol	GASHYDRINHIB	3939	393,474	0
Oceanic HW 443	HYDFLUID	3751	0	0
Oceanic HW443 R	HYDFLUID	3930	0	0
SOBO S GOLD 08	DETERGENT	23125	0	0

5.8.3 Discharge of Oil under OPPC Regulations

The Blythe platform does not hold an oil discharge permit under the OPPC regulations as it does not discharge treated produced water to the sea. All produced water is exported for treatment onshore.

5.8.4 Waste

Wastes generated at the Blythe platform were all transported to shore for subsequent management by a licensed waste contractor in accordance with regulation and ODE AM waste management procedures. The fate and characteristics of generated wastes in 2024 were:

- Recycled – 0.89 te
- Waste to energy – 10.04 te
- Treatment – 1.75 te
- Special – 10.25 te
- Non-hazardous – 2.43 te

5.8.5 Accidental Environmental Events

No accidental environmental events occurred at the Blythe NUI during 2024.

6 2025 ENVIRONMENTAL OBJECTIVES

Objectives to ensure the continued effectiveness of ODE AM environmental management and performance for 2025 include:

- Ensure full legislative and regulatory compliance.
- Continue the review, communication, and internal audit of the ODE AM SEMS to ensure a suitable and robust system remains in place to manage Company operations in accordance with Company policies and statutory regulations.
- Ensure a thorough identification of Company environmental risks and opportunities and the needs and obligations associated with stakeholders.
- Consultation with JNCC and DESNZ as required with respect to new permit applications.
- Ensure appropriate communications are held with regulators and environmental stakeholders as necessary to support ongoing and new Installation Operator responsibilities.
- Ensure all necessary submissions are made to regulators to support the environmental consenting process for all Installation Operator responsibilities.
- Undertake environmental performance monitoring and management of contractors, suppliers and third-party support as required.
- Schedule and ensure identified personnel undertake appropriate SHE training.
- Ensure environmental risk assessments are completed for all major activities.
- Ensure any environmental incidents are investigated and followed through to closure.
- Continue strategy development for achieving carbon net zero in accordance with Government targets.