# ODE Asset Management Limited

## OSPAR Public Statement - 2021

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ode
Asset Management

# CONTACT DETAILS

**ODE Asset Management Ltd**
St George's House, 5 St George's Road
Wimbledon, London SW19 4DR

T +44 (0) 20 8481 1190
F +44 (0) 20 8546 4346
www.ode-ltd.co.uk

# REVISION

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| | | | | |
| 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 |
| BEIS | (Department of) Business, Energy & Industrial Strategy |
| BMS | Business management system |
| 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 |
| NNM | Not normally manned |
| NSTA | North Sea Transition Authority (formerly Oil & Gas Authority) |
| ODEAM | ODE Asset Management Limited |
| OGA | Oil & Gas Authority |
| 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 Business, Energy and Industrial Strategy (BEIS) requires all operators of offshore installations, including Well Operators, to produce a Public Statement to report their environmental performance. These Statements must be prepared on an annual basis (covering offshore installation activities carried out during the previous calendar year), made available to the public and copied to BEIS 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 ODEAM) UK Continental Shelf (UKCS) operated offshore activities during 2021. It is focused on environmental issues associated with operations which were directly under the control of ODEAM and demonstrates how management systems in place seek to continuously improve environmental performance.

In 2021 ODEAM continued Installation Operator and Pipeline Operator responsibilities for the Babbage installation in the Southern North Sea (SNS). ODEAM operates Babbage on behalf of NEO Energy.

In September 2021 ODEAM additionally assumed Installation Operator and Pipeline Operator responsibilities for the Tors (comprising Kilmar and Garrow platforms) & Wenlock assets, also located in the SNS. ODEAM operates Tors & Wenlock on behalf of Alpha Petroleum.

# 3 ABOUT ODEAM

ODEAM is a private company and an integral part of the DORIS Group, celebrating 55 years in the Oil & Gas business in 2020. ODEAM is recognised as a worldwide leader in offshore solutions for subsea, pipelines, fixed and floating facilities plus our onshore reception terminal and renewables capabilities.

ODEAM is headquartered in London with business centres in Great Yarmouth and Aberdeen. The Great Yarmouth base has been established for over two decades providing direct UK Southern North Sea 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 offering, new offices were established in Aberdeen to further support North Sea operations.

ODEAM's principal objective is to achieve maximum value from every asset with zero harm to people or the environment and to comply with regulations. ODEAM 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: www.ode-ltd.co.uk

# 4 ENVIRONMENTAL MANAGEMENT SYSTEM

ODEAM 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. ODEAM'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 ODEAM.

The ODEAM Safety & Environmental Management System (SEMS) is a component of the overall integrated Business Management System (BMS). The BMS incorporates a Safety, Health, Environment & Quality (SHEQ) 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 SHEQ Management Systems.

All facilities are managed and operated by ODEAM 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 ODEAM and its contractors to operate its assets including Babbage in accordance with legislation and to meet the ODE SHEQ 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 remain valid until May 2024. The appointment of ODEAM as a Pipeline and Installation Operator for the assets described has not been objected to by NSTA (formerly OGA), BEIS and the HSE.

The ODE Group (ODE Group and all subsidiaries, including ODEAM) SHEQ policy lists commitments to SHEQ and is presented Figure 1. The ODE Group is committed to continually improving all core business systems and does so through regular (at least bi-annual) 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 ODEAM 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.

# SHEQ Policy

ODE Group companies provide project management, engineering, procurement and operational maintenance, integrity, installation and pipeline operator services for the design, construction, installation, operation and decommissioning of facilities for the oil and gas, petrochemical and renewable energy industries. 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 SHEQ and working together, by setting clear objectives and maintaining open communication channels

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

- Actively promote SHEQ 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 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
- Ensure effective and proactive management, control, monitoring and review of all major accident 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
- Communicate openly with interested parties 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 Group companies-controlled locations or performing activities on behalf of ODE Group companies at other sites are required to work in accordance with the requirements of the Business Management System 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.

**Andrew Baker,** Managing Director

**Date: 01/01/22**
**Review date: 01/01/23**

**Figure 1 ODE SHEQ Policy**

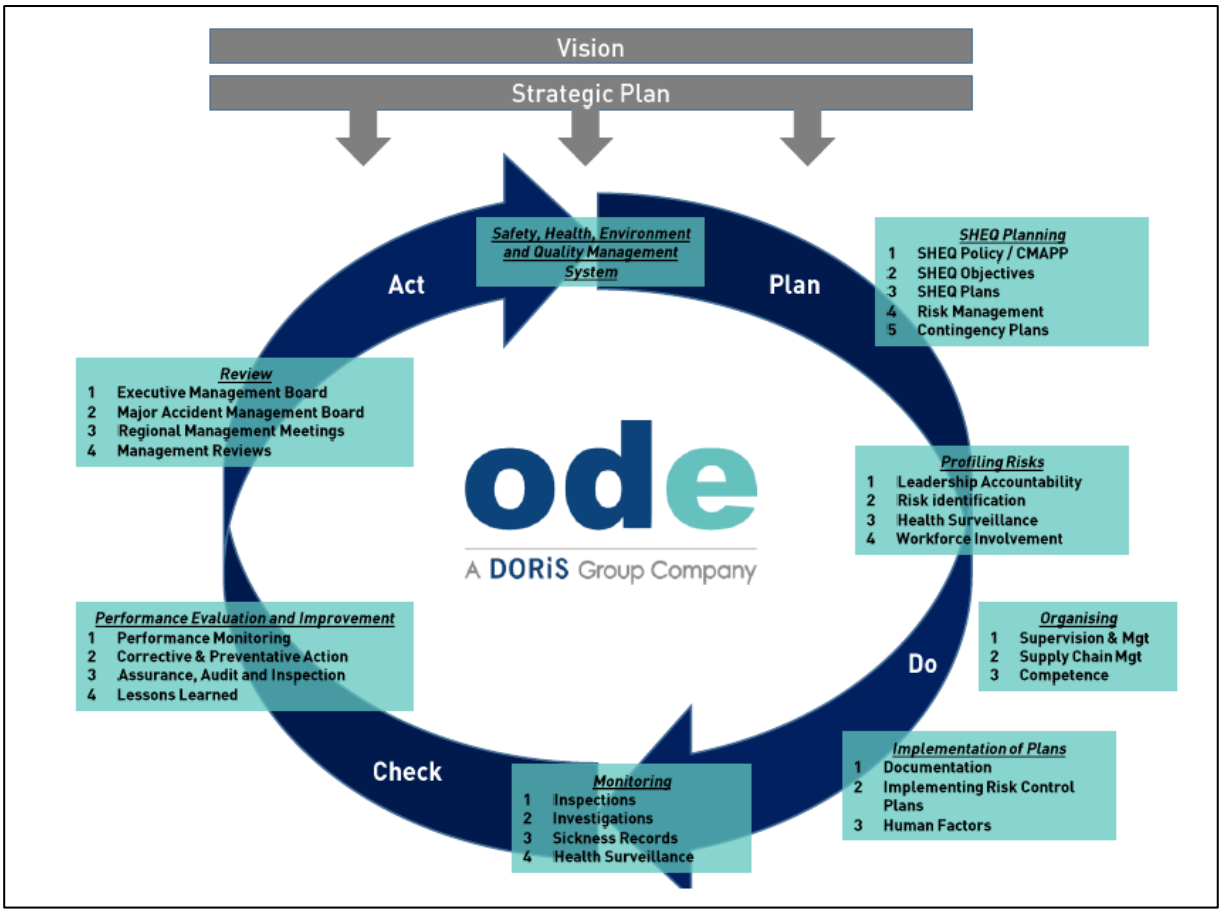


**Figure 2 ODE Group Management Cycle - Plan, Do, Check, Act**

# 5 2021 ENVIRONMENTAL PERFORMANCE

## 5.1 Overview of 2021 Activities

In 2021 ODEAM continued in the role as Installation Operator for the Babbage gas platform located in the Southern North Sea. The Babbage platform is classed as “not normally manned” (NNM). ODEAM operate the Babbage gas platform on behalf of NEO Energy.

In addition, in October 2021 ODEAM assumed Installation Operator responsibilities for the Wenlock NUI and Tors (comprising Kilmar and Garrow NUIs) gas production assets on behalf of the owners Alpha Petroleum.

The environmental performance of these assets during 2021 is described below.

## 5.2 Management and Recording of Applicable Environmental Aspects

An Asset-specific Safety & Environmental Management System (ASEMS) in place for each of the Babbage and Tors & Wenlock assets. These mandate the preparation and review of asset-specific environmental aspect registers in accordance with the requirements of the ODEAM 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 ODEAM corporate risk matrix.

Development and maintenance of the environmental aspect registers for Babbage and Tors & Wenlock 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 NNM Installation

A total of 22 potential environmental aspects have been identified and assessed for the Babbage NNM, of which 20 were considered applicable to operations in 2021 (the non-applicable aspects were associated with micro-turbine operations and the produced water system neither of which were in operation 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
- 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 assessment for the Wenlock NUI, all of which were applicable to varying degrees throughout 2021. 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 Wenlock Licensee (Alpha Petroleum)
- Installation-specific emergency response plans in place
- Oil Pollution Emergency Plan in place
- All diesel and chemical bunkering operations undertaken in daylight and in good weather conditions (i.e., when manned)

#### 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.

## 5.4 Babbage NNM Installation Environmental Performance

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

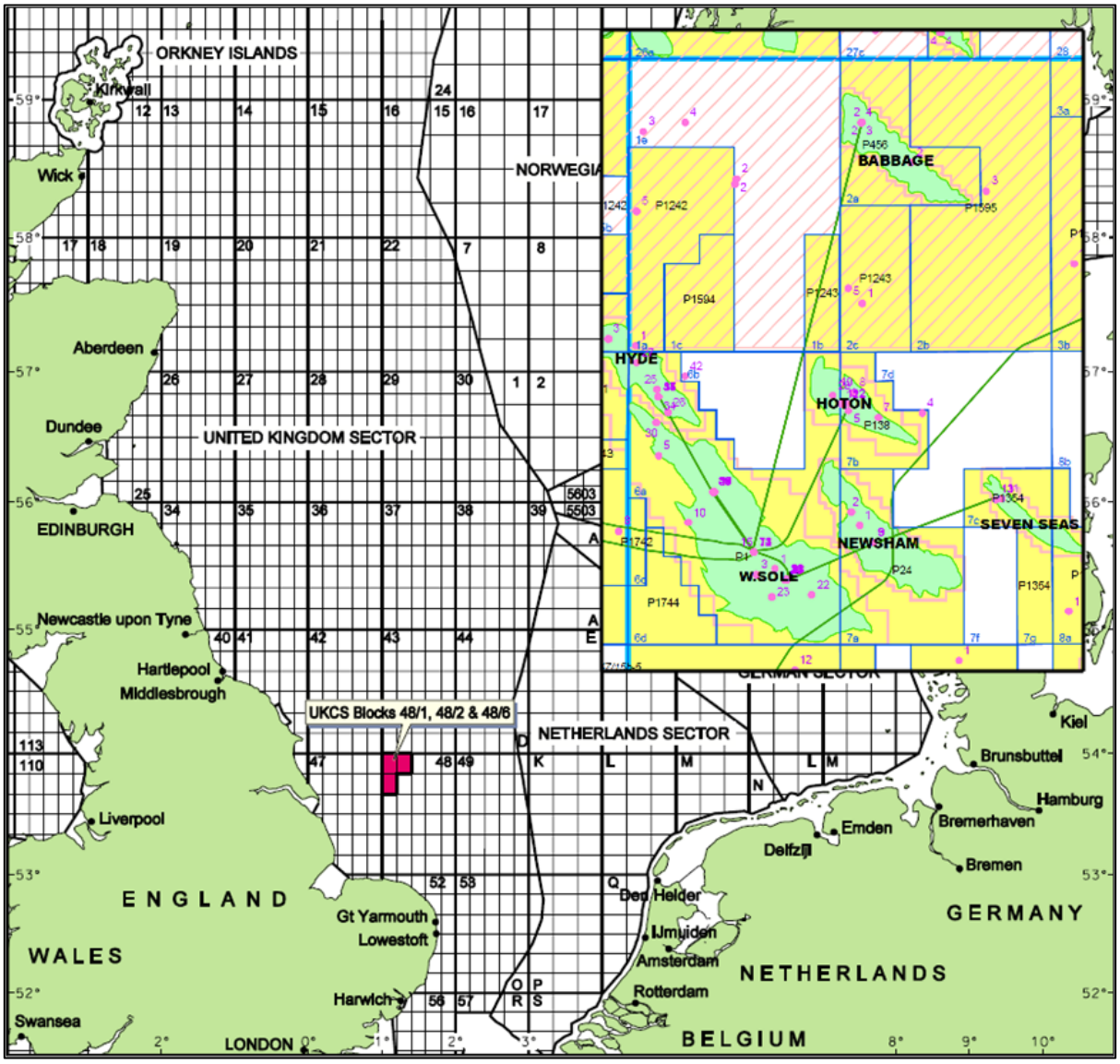


**Figure 3 Babbage Field and Platform Location**

ODEAM monitors and reports on atmospheric emissions, the discharge of oil in produced water, the use and discharge of chemicals, the disposal of waste and hydrocarbon and chemicals spill incidents for the Babbage NNM Installation. This section presents the information that was reported via the online Environmental and Emissions Monitoring System (EEMS) for operations during 2021.

### 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 2021, comprising diesel combustion and cold venting of reservoir gas, were 551.6 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 2021 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 | 267.5 | 0.0 |
| BIOC41000A | BIOCIDE | 27434 | 44.0 | 0.0 |
| CORRTREAT 15571 | CORRINIHIB | 27900 | 16,350.0 | 0.0 |
| FOAM20502A | OTHER | 27616 | 3,398.5 | 0.0 |
| Hydrosure HD-5000 | BIOCIDE | 24858 | 29.5 | 0.0 |
| Methanol | GASHYDRINHIB | 1377 | 34,226.0 | 0.0 |
| Methanol | GASHYDRINHIB | 28856 | 0.0 | 0.0 |
| Oceanic HW540 E | HYDFLUID | 4964 | 775.0 | 0.0 |
| Potassium chloride | SHALEINHIB | 26708 | 38,700.0 | 0.0 |
| SOBO S GOLD 08 | DETERGENT | 23125 | 50.0 | 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 2021 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 ODEAM waste management procedures. The fate and characteristics of generated wastes in 2021 was:

- Recycled – 26.71 te
- Waste to energy – 5.04 te
- Treatment – 9.53 te
- Special – 23.04 te
- Non-hazardous – 18.24 te

### 5.4.5 Accidental Environmental Events

In December 2021 a PON1 notification was raised for the accidental loss to sea of 336 kg of aqueous hydraulic fluid. A full investigation was conducted and the loss to sea was found to be caused by a leakage from the stem of a valve located within the test separator system. Following conclusion of the investigation the faulty equipment was replaced.

## 5.5 Tors & Wenlock Environmental Performance

### 5.5.1 Wenlock NUI

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

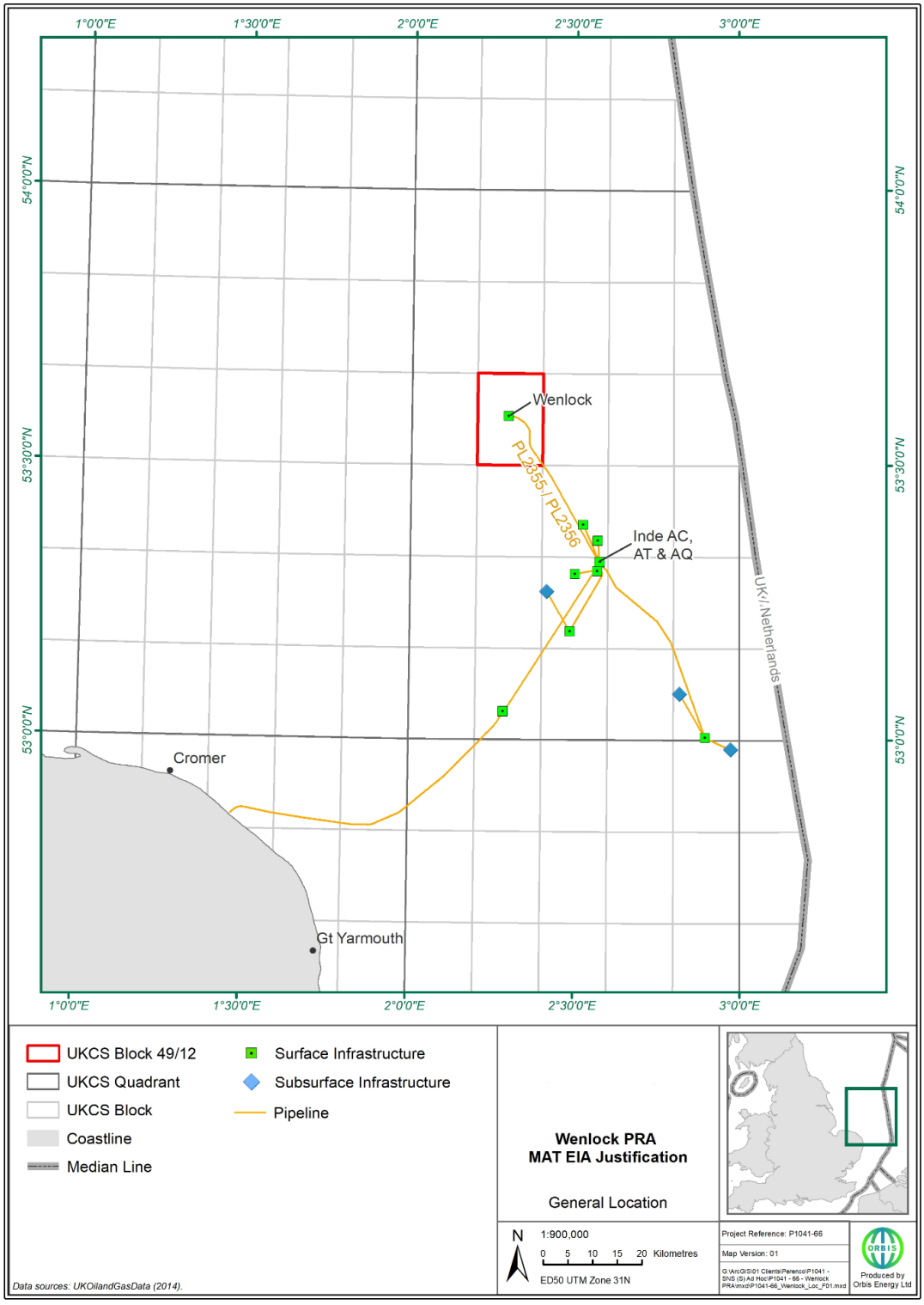


**Figure 4 Wenlock Platform Location**

#### 5.5.1.1 Atmospheric Emissions

Greenhouse gas (GHG) emissions were generated at the Wenlock platform from October 2021 due to power generation (i.e. running of diesel generator). 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 2021 from diesel combustion were 108.4 te CO2e.

#### 5.5.1.2 Discharge of Chemicals to Sea

The Wenlock NUI employs two chemicals that are controlled by permit under the Offshore Chemical Regulations 2002. These comprise a corrosion inhibitor to maintain system integrity when production is ongoing, and a detergent to support maintenance operations. Chemicals are controlled under permit subject to the Offshore Chemical Regulations 2002. Chemicals included in the permit for year 2021 are quantified below.

| Chemical | | | Used, kg | Discharged, kg |
|---|---|---|---|---|
| **Name** | **Function Group** | **DTI Code** | | |
| CRW85689 | CORRINIHIB | 23422 | 0.0 | 0.0 |
| SOBO S GOLD 08 | DETERGENT | 23125 | 50.0 | 25.0 |

#### 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 ODEAM waste management procedures. The fate and characteristics of generated wastes since October 2021 was:

- Recycled – 0.52 te
- Waste to energy – 0.36 te
- Treatment – 0.0 te
- Special – 0.21 te
- Non-hazardous – 0.67 te

#### 5.5.1.4 Accidental Environmental Events

No accidental environmental events occurred at the Wenlock NUI during 2021 following the transfer of Installation Operator responsibilities to ODEAM in October.

### 5.5.2 Kilmar NUI

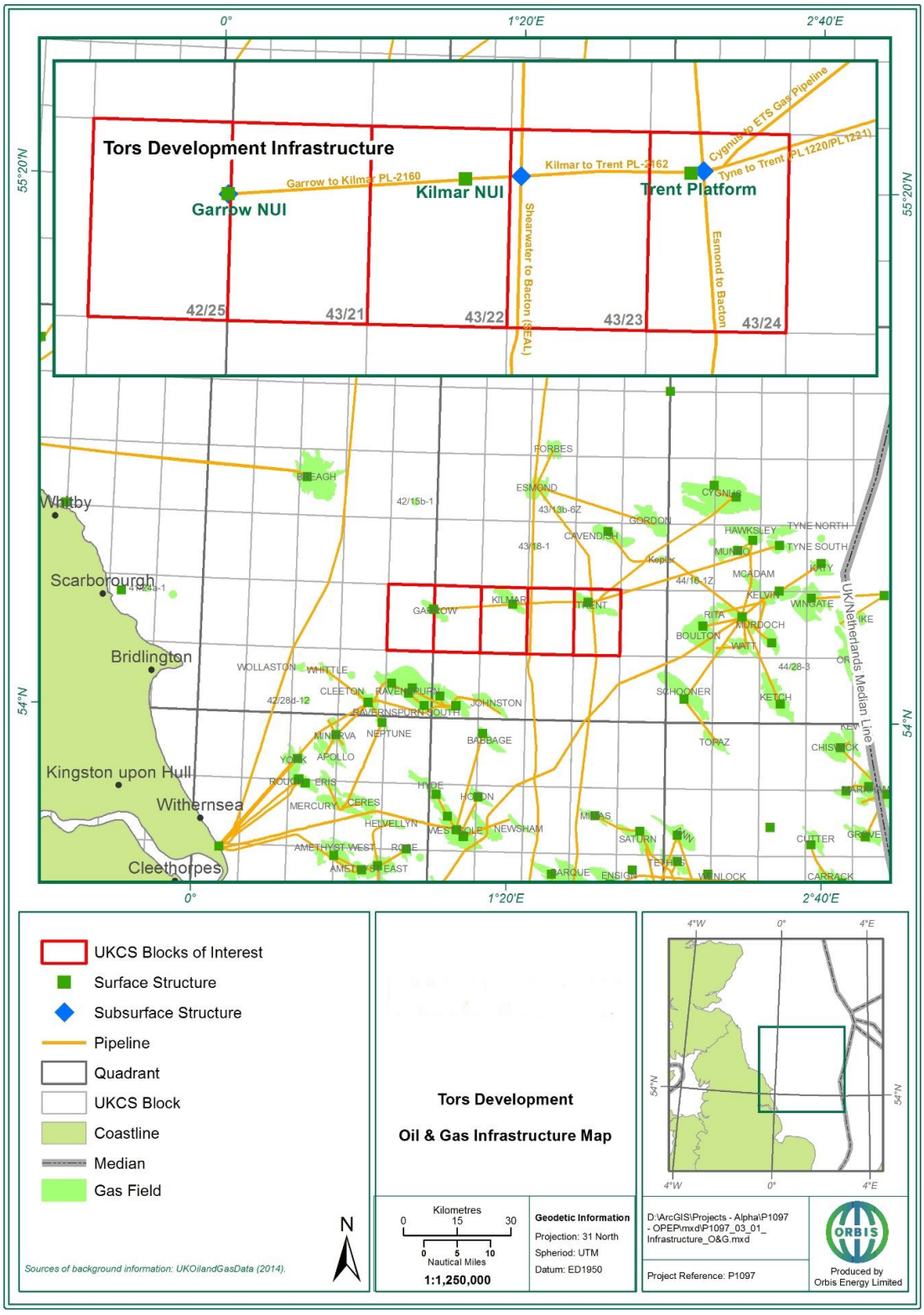


**Figure 5 Tors (Comprising Kilmar & Garrow NUIs) Location**

#### 5.5.2.1 Atmospheric Emissions

Greenhouse gas (GHG) emissions were generated at the Kilmar platform from October 2021 due to power generation (i.e. running of diesel generator). 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 2021 from diesel combustion were 108.4 te CO2e.

#### 5.5.2.2 Discharge of Chemicals to Sea

| Chemical | | | Used, kg | Discharged, kg |
|---|---|---|---|---|
| **Name** | **Function Group** | **DTI Code** | | |
| CRW85689 | CORRINIHIB | 23422 | 0 | 0 |
| MONOETHYLENE GLYCOL (ALL GRADES) | GASHYDRINHIB | 23375 | 0 | 0 |
| SOBO S GOLD 08 | DETERGENT | 23125 | 50 | 25 |

#### 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 have occurred.

#### 5.5.2.4 Waste

No wastes were transported to shore from the Kilmar NUI for disposal during 2021 following the transfer of Installation Operator responsibilities to ODEAM in October.

#### 5.5.2.5 Accidental Environmental Events

No accidental environmental events occurred at the Kilmar NUI during 2021 following the transfer of Installation Operator responsibilities to ODEAM in October.

### 5.5.3 Garrow NUI

The location of the Garrow NUI is indicated in Figure 5. No production took place during 2021 following the transfer of Installation Operator responsibilities to ODEAM in October.

#### 5.5.3.1 Atmospheric Emissions

Greenhouse gas (GHG) emissions are generated at the Garrow platform from October 2021 due to power generation (i.e. running of diesel generator). 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 2021 from diesel combustion were 108.4 te CO2e.

#### 5.5.3.2 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 2021 is quantified below.

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

#### 5.5.3.3 Waste

No wastes were transported to shore from the Garrow NUI for disposal during 2021 following the transfer of Installation Operator responsibilities to ODEAM in October.

#### 5.5.3.4 Accidental Environmental Events

No accidental environmental events occurred at the Garrow NUI during 2021 following the transfer of Installation Operator responsibilities to ODEAM in October.

# 6 2022 ENVIRONMENTAL OBJECTIVES

Objectives to ensure the continued effectiveness of ODEAM environmental management and performance for 2022 include:

- Ensure full legislative and regulatory compliance
- Continue the review, communication, and internal audit of the ODEAM 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 OPRED 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 new Installation Operator responsibilities
- Undertake S&E 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