



# ODE Asset Management Limited

## OSPAR Public Statement - 2022

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## REVISION

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## Abbreviations

ASEMS	Asset safety & environment management system
BAT	Best Available Technique
BEIS	(Department of) Business, Energy & Industrial Strategy (now Department for Energy Security and Net Zero)
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
NPAI	Not permanently manned installation
NSTA	North Sea Transition Authority (formerly Oil & Gas Authority)
NUI	Normally unmanned installation
ODEAM	ODE Asset Management Limited
OGA	Oil & Gas Authority (now NSTA)
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 2022. 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 2022 ODEAM continued Installation Operator and Pipeline Operator responsibilities for the Babbage installation in the Southern North Sea (SNS) and the Tors (comprising Kilmar and Garrow platforms) & Wenlock assets, also located in the SNS. ODEAM operates Babbage on behalf of NEO Energy and operates Tors & Wenlock on behalf of Alpha Petroleum.

In 2022 ODEAM also commenced the role of Installation Operator and Pipeline Operator for the Tolmount gas platform and export pipeline and Blythe gas platform and export pipeline, both also located in the SNS. Both assets achieved first gas and commenced production in 2022. Tolmount and Blythe are operated on behalf of Harbour Gathering System Limited (HGSL), and Independent Oil and Gas (IOG) respectively.

## 3 ABOUT ODEAM

ODEAM is a private company and an integral part of the DORIS UK 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: <https://www.dorisgroup.com/>

## 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), the Department for Energy Security and Net Zero (formerly BEIS) and the HSE.

The Doris UK Group (Doris Group and all subsidiaries, including ODEAM) SHEQ policy lists commitments to SHEQ and the current version is presented Figure 1. Doris UK 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

DORIS UK 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 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 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 DORIS UK Group companies-controlled locations or performing activities on behalf of DORIS UK 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: 01/01/2023  
Review date: 01/01/2024

SPBM-1-1000

Figure 1 ODE SHEQ Policy



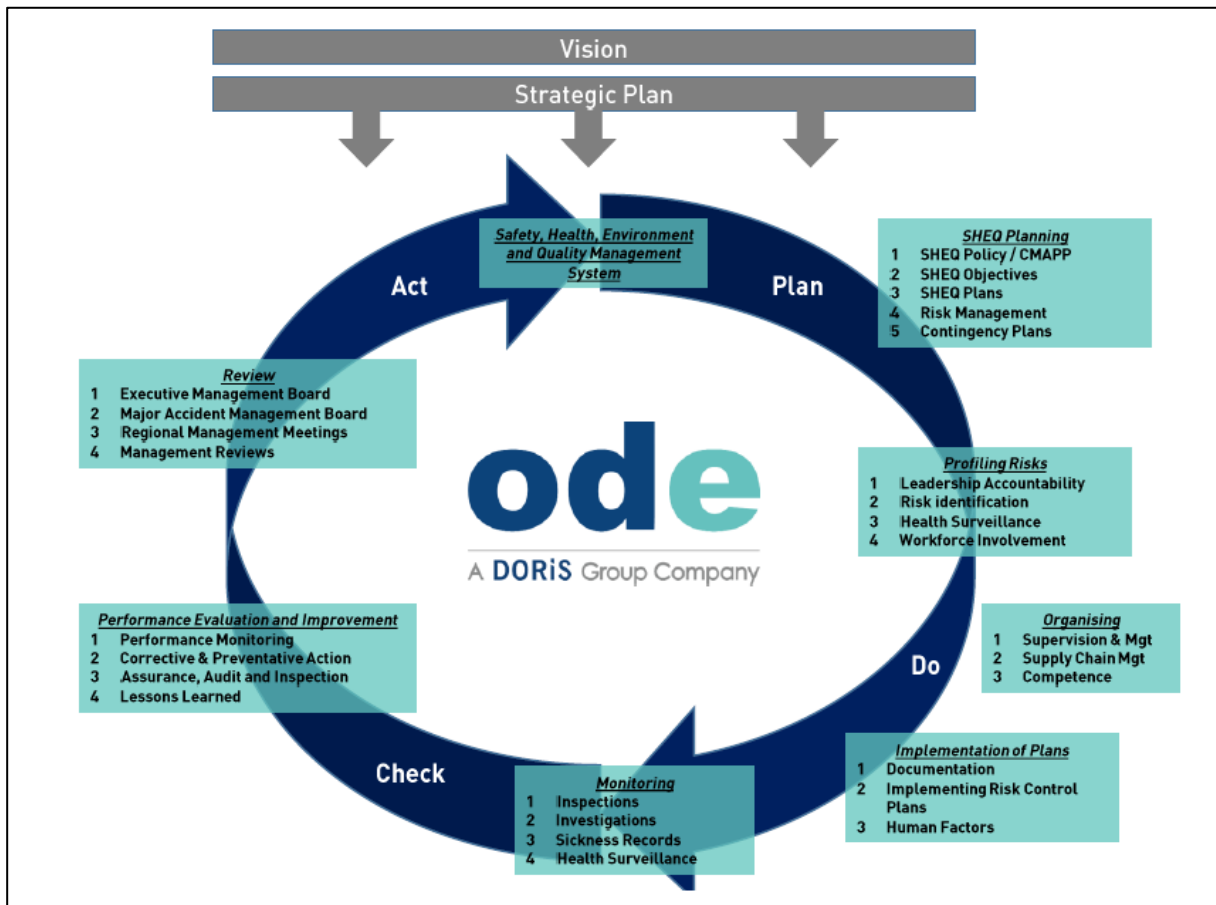


Figure 2 ODE Group Management Cycle - Plan, Do, Check, Act

## 5 2022 ENVIRONMENTAL PERFORMANCE

### 5.1 Overview of 2022 Activities

In 2022 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 a not permanently attended installation (NPAI). ODEAM operate the Babbage gas platform on behalf of NEO Energy. Operations also continued at the Wenlock normally unattended installation (NUI), and the Tors NUIs (comprising Kilmar and Garrow platforms) gas production assets on behalf of the owners Alpha Petroleum.

However, activities increased in 2022 with the addition of the Tolmount NUI and Blythe NUI, both of which commenced production. ODEAM acts as Installation Operator and Pipeline Operator for both assets on behalf of Humber Gathering System Limited (HGSL) and IOG respectively.

### 5.2 Management and Recording of Applicable Environmental Aspects

An Asset-specific Safety & Environmental Management System (ASEMS) in place for all the described 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 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 2022 (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
- 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 2022. 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. 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 were 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.

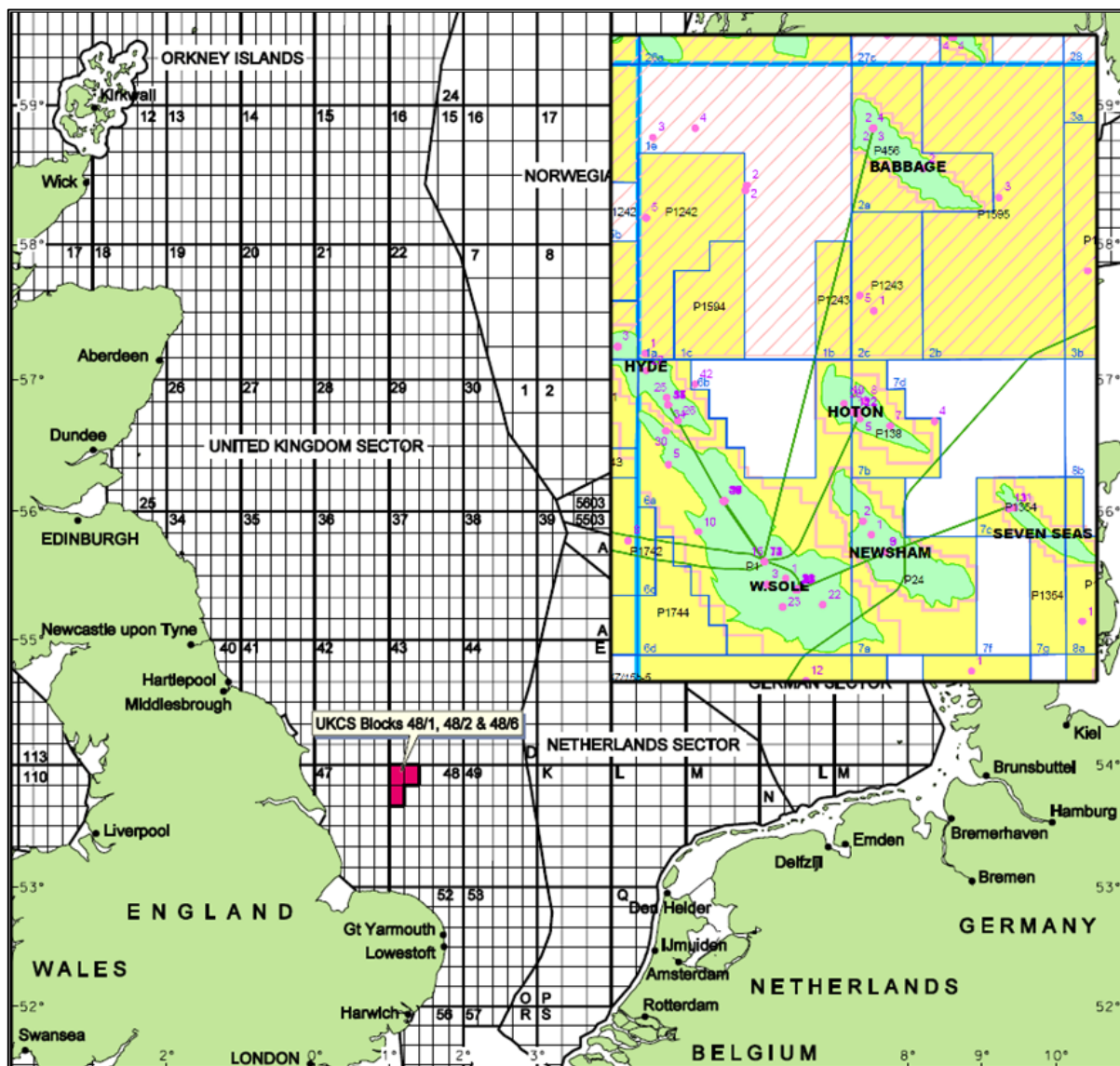
### 5.2.5 Environmental Risk Reduction Measures

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
- 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**

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 NPAI Installation. This section presents the information that was reported via the online Environmental and Emissions Monitoring System (EEMS) for operations during 2022.

#### 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 2022, comprising diesel combustion and cold venting of reservoir gas, were 628.1 te CO<sub>2</sub>e.

#### 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 2022 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	263	0.0
BIOC41000A	BIOCIDE	27434	49	0.0
CORRTREAT 15571	CORRINHIB	27900	15,682	0.0
FOAM20502A	OTHER	27616	2,588	0.0
Hydrosure HD-5000	BIOCIDE	24858	22	0.0
Methanol	GASHYDRINHIB	28856	41,628	0.0
Potassium chloride	SHALEINHIB	26708	34,800	0.0
SOBO S GOLD 08	DETERGENT	23125	15	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 2022 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 2022 were:

- Recycled – 15.48 te
- Waste to energy – 4.83 te
- Treatment – 5.90 te
- Special – 15.91 te
- Non-hazardous – 16.90 te

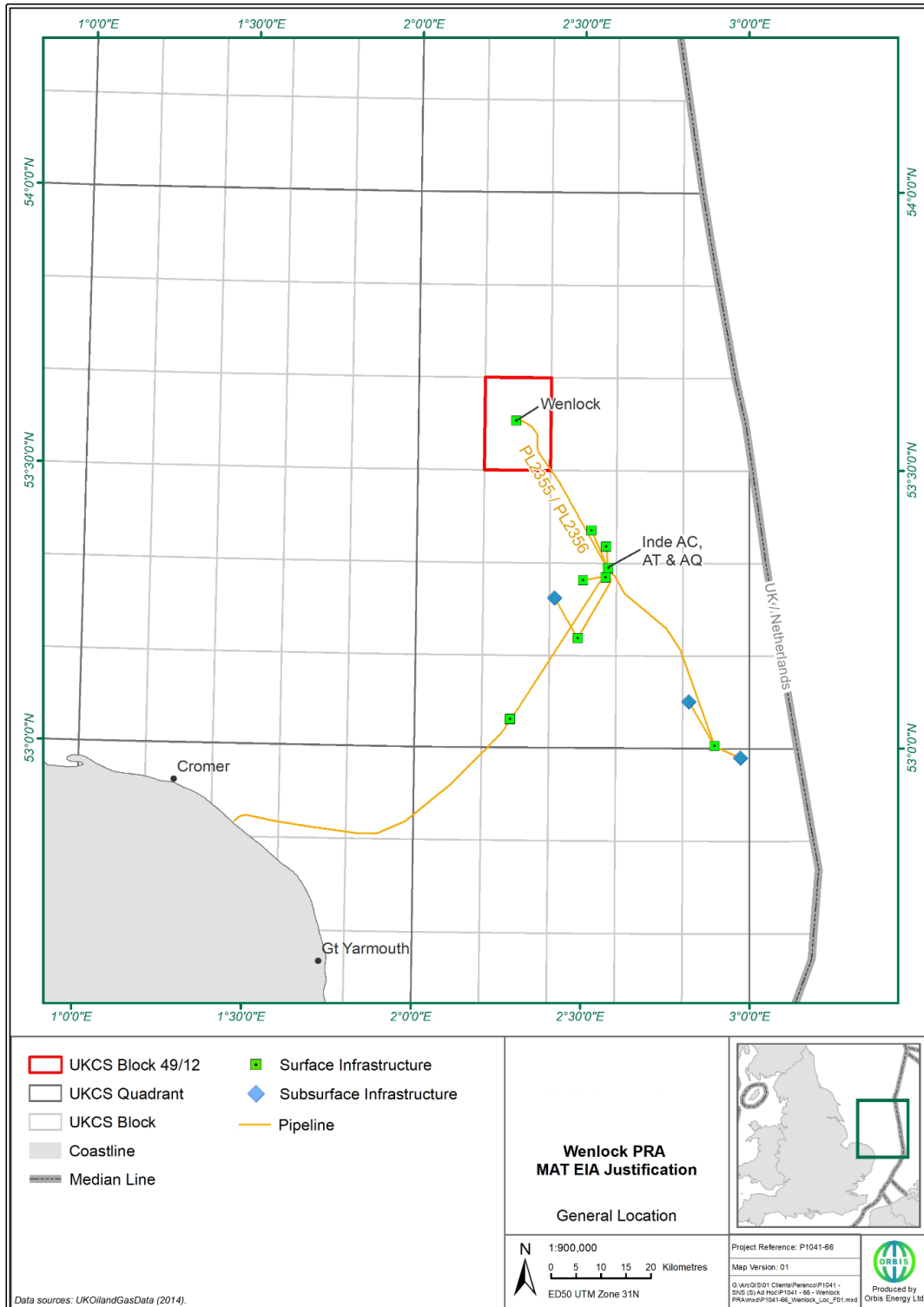
#### 5.4.5 Accidental Environmental Events

In September 2022 a PON1 notification was raised due to a weeping control line isolation valve fitting which caused a loss of 94 kg of aqueous hydraulic fluid to sea via a grating. The system was isolated and investigated, and the faulty fitting was removed and 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 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 2022 from diesel combustion were 67.5 te CO<sub>2</sub>e.

### 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 2022 are quantified below.

Chemical			Used, kg	Discharged, kg
Name	Function Group	DTI Code		
CRW85689	CORRINIIB	23422	0.0	0.0
SOBO S GOLD 08	DETERGENT	23125	53.0	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 ODEAM waste management procedures. The fate and characteristics of generated wastes during 2022 were:

- Recycled – 2.94 te
- Waste to energy – 1.44 te
- Treatment – 0.0 te
- Special – 1.28 te
- Non-hazardous – 3.10 te

### 5.5.1.4 Accidental Environmental Events

No accidental environmental events occurred at the Wenlock NUI during 2022.



5.5.2 Kilmar NUI

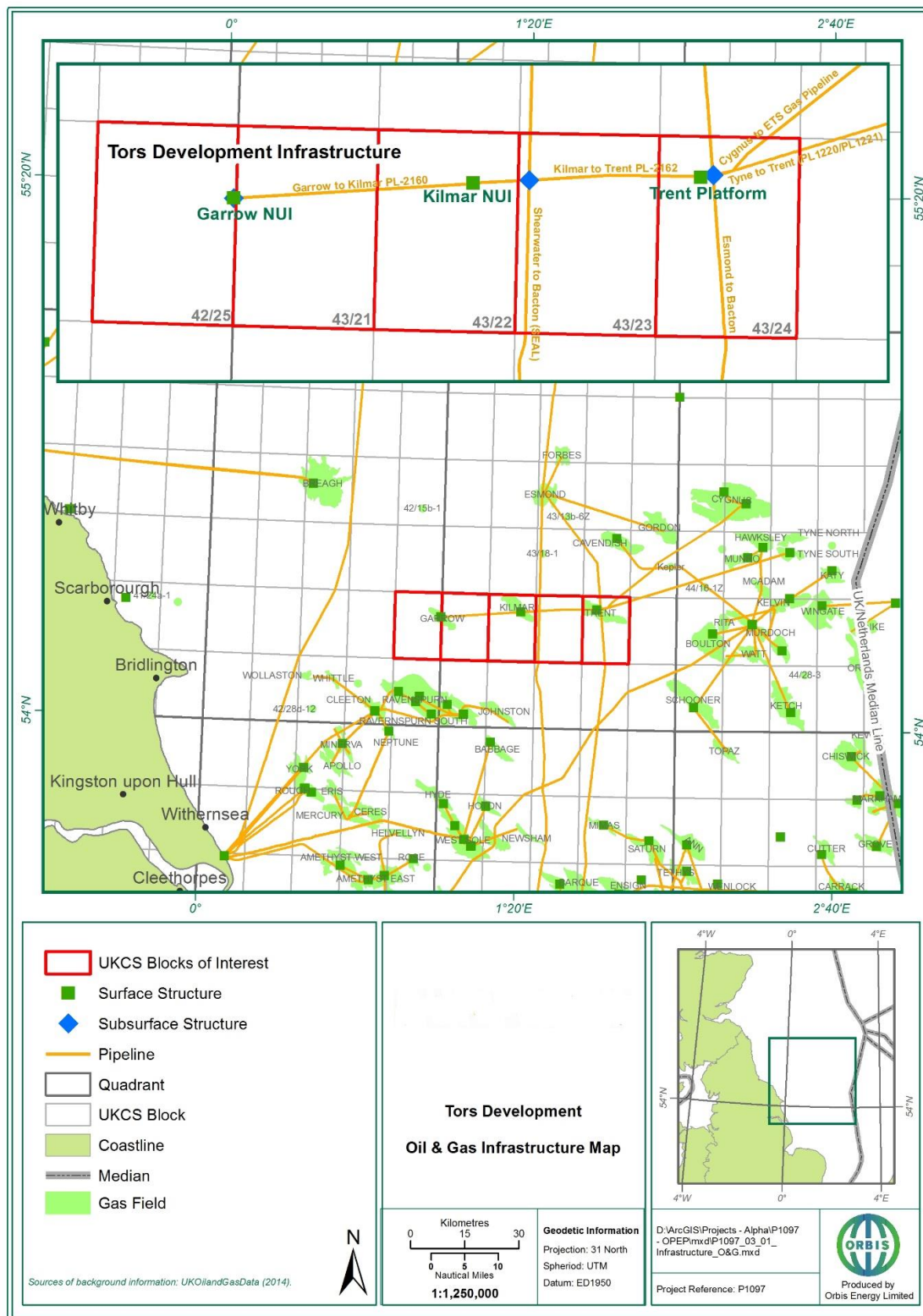


Figure 5 Tors (Comprising Kilmar & Garrow NUIs) Location

#### 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). 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 2022 from diesel combustion were 80.3 te CO<sub>2</sub>e.

#### 5.5.2.2 Discharge of Chemicals to Sea

Chemical			Used, kg	Discharged, kg
Name	Function Group	DTI Code		
CRW85689	CORRINIIB	23422	0	0
MONOETHYLENE GLYCOL (ALL GRADES)	GASHYDRINHIB	23375	0	0
SOBO S GOLD 08	DETERGENT	23125	51	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 have occurred during 2022.

#### 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 ODEAM waste management procedures. The fate and characteristics of generated wastes during 2022 were:

- Recycled – 1.09 te
- Waste to energy – 0.94 te
- Treatment – 0.64 te
- Special – 1.22 te
- Non-hazardous – 1.45 te

#### 5.5.2.5 Accidental Environmental Events

No accidental environmental events occurred at the Kilmar NUI during 2022.

### 5.5.3 Garrow NUI

The location of the Garrow NUI is indicated in Figure 5. No production took place during 2022 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 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 2022 from diesel combustion were 80.3 te CO<sub>2</sub>e.

#### 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 2022 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

Wastes generated at the Garrow 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 during 2022 were:

- Recycled – 1.80 te
- Waste to energy – 0.58 te
- Treatment – 0.0 te
- Special – 1.45 te
- Non-hazardous – 0.92 te

#### 5.5.3.4 Accidental Environmental Events

No accidental environmental events occurred at the Garrow NUI during 2022.

## 5.7 Tolmount NUI Environmental Performance

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

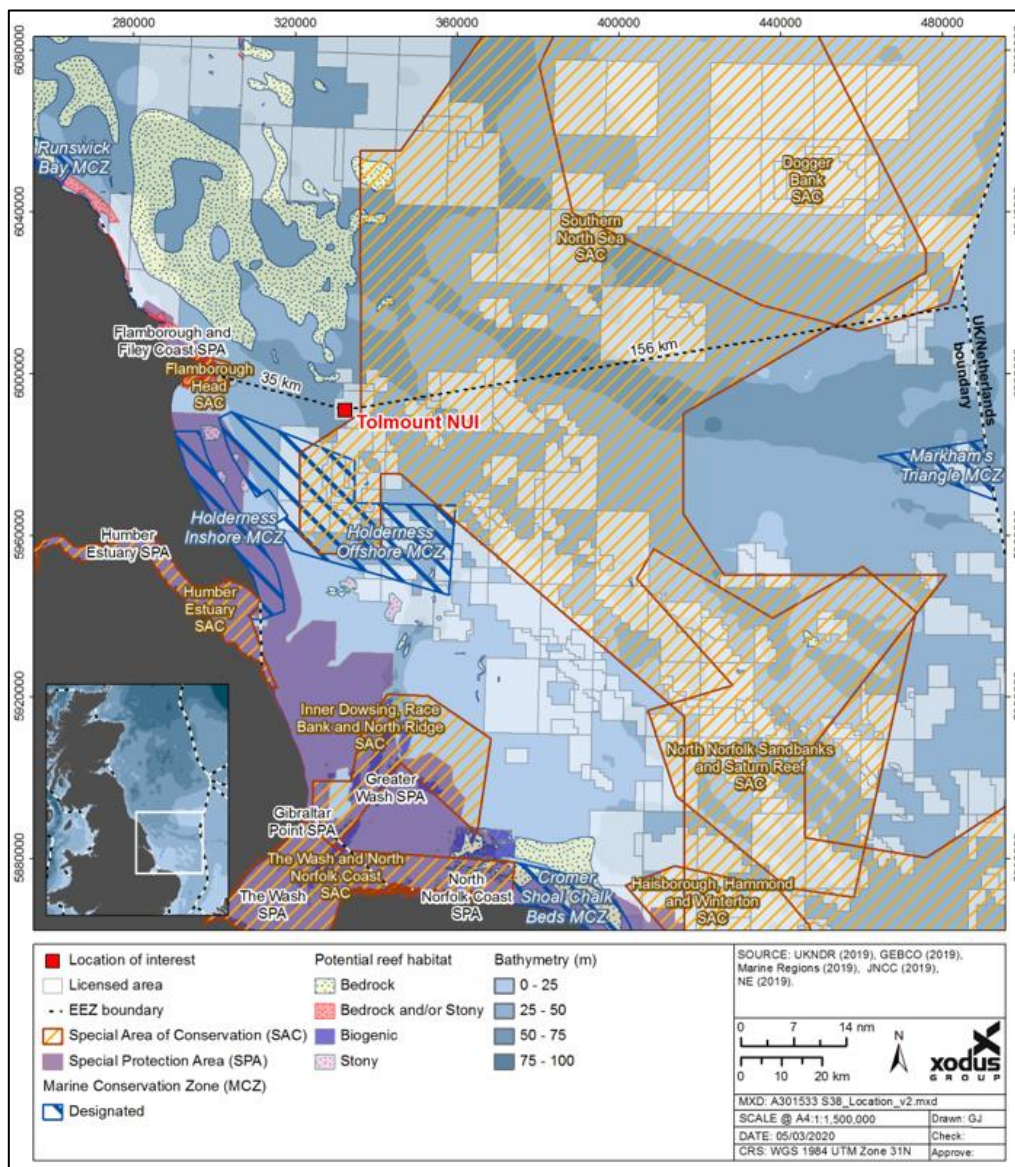


Figure 6 Tolmount NUI Location

### 5.7.1 Atmospheric Emissions

Greenhouse gas (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 Integrated Pollution Prevention & Control (IPPC) permitting and Greenhouse Gas Emissions Trading Scheme (ETS) requirements. Total GHG platform emissions for 2022, comprising diesel combustion, fuel gas combustion and cold venting of reservoir gas, were 649.0 te CO<sub>2</sub>e.

### 5.7.2 Discharge of Chemicals to Sea

The Tolmount 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 2022 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		
AFMR20360A	ANTIFOAMHYD	26837	0	0
CLAR16489A	DEOILER	27440	0	0
CORR10020A	CORRINHIB	26561	0	0
EMBR18067A	DEMULSIFIER	26861	0	0
MEG (all dilutions)	PIPEHYDTEST	28855	0	0
Methanol	GASHYDRINHIB	29393	2,247,560	2,230,983
Monoethylene Glycol (All dilutions)	GASHYDRINHIB	29709	3,549	3,549
SCAL16662A	SCALEINHIBIT	27032	5,639	5,517
SOBO S GOLD 08	DETERGENT	23125	0	0

### 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 permit. The produced water treatment system was designed and approved according to the principles of best available technique (BAT) to minimize discharge of the reservoir condensate to sea. During 2022 the system operated as follows:

- Total volume of water treated – 1991.5 m<sup>3</sup>
- Days on stream – 175
- Weight of oil discharged to sea – 0.03 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 ODEAM waste management procedures. The fate and characteristics of generated wastes in 2022 were:

- Recycled – 6.03 te
- Waste to energy – 1.89 te
- Treatment – 14.25 te
- Special – 3.46 te

- Non-hazardous – 18.17 te

#### 5.7.5 Accidental Environmental Events

In April 2022 a PON1 notification was raised due to a loose hydraulic connection which caused the loss of 1 kg of aqueous hydraulic control fluid to sea. No oil was lost to sea. The hydraulic line was depressurized, and an isolation applied prior to repair.

### 5.9 Blythe NUI Environmental Performance

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

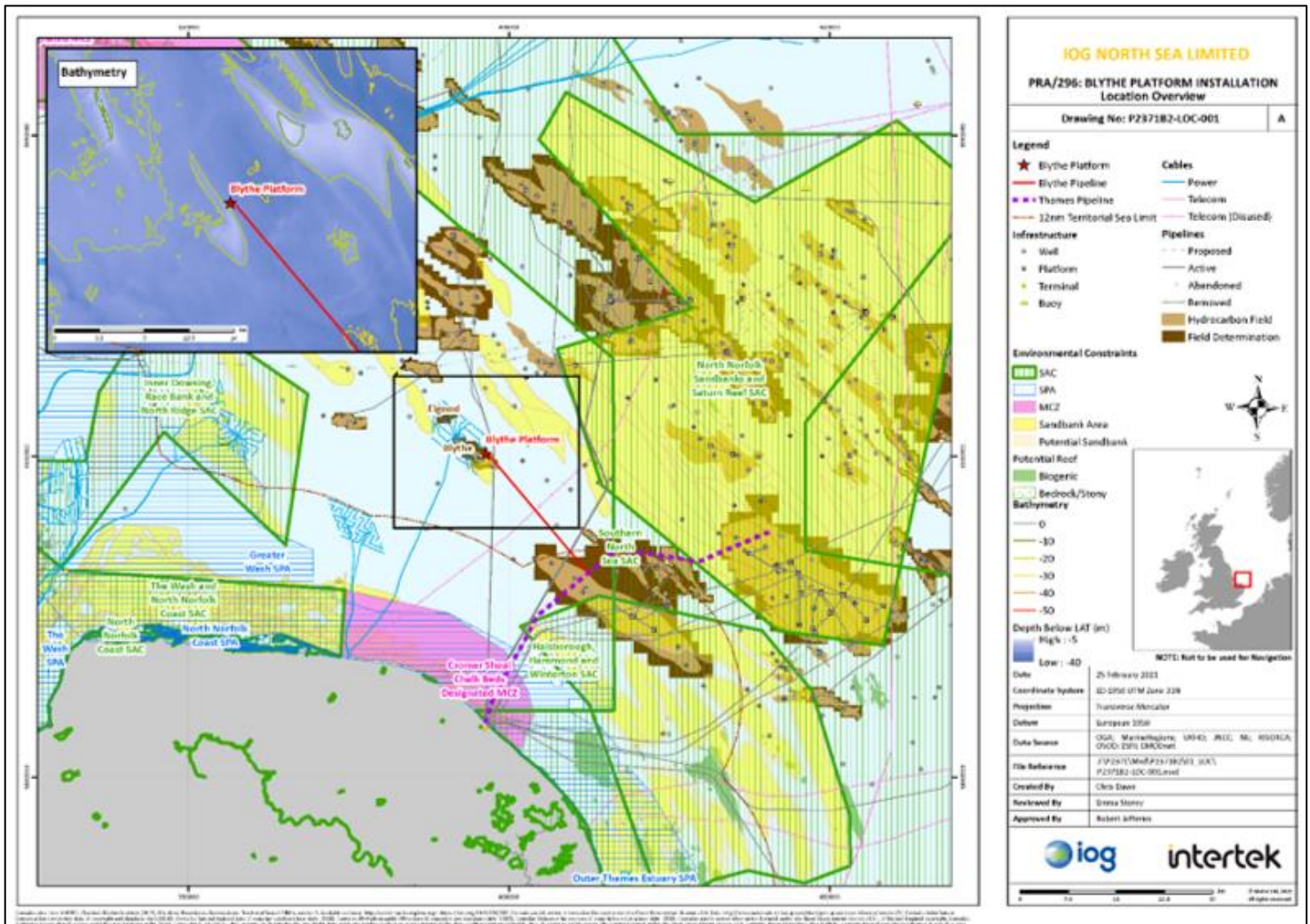


Figure 7 Blythe NUI Location

#### 5.9.1 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 2022, comprising diesel combustion and cold venting of reservoir gas, were 915.3 te CO<sub>2</sub>e.

#### 5.9.2 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.

Chemical			Used, kg	Discharged, kg
Name	Function Group	DTI Code		
CRW85689	CORRINHIB	23422	2,320	0
Methanol (all dilutions)	GASHYDRINHIB	28856	15,336	0
Mono Ethylene Glycol	GASHYDRINHIB	3939	1,788,764	0
Oceanic HW 443	HYDFLUID	3751	0	180
Oceanic HW443 R	HYDFLUID	3930	118	0
SOBO S GOLD 08	DETERGENT	23125	0	0

### 5.9.3 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.

### 5.9.4 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 ODEAM waste management procedures. The fate and characteristics of generated wastes in 2022 were:

- Recycled – 16.15 te
- Waste to energy – 2.79 te
- Treatment – 3.48 te
- Special – 17.00 te
- Non-hazardous – 5.42 te

### 5.9.5 Accidental Environmental Events

No accidental environmental events occurred at the Blythe NUI during 2022.



## 6 2023 ENVIRONMENTAL OBJECTIVES

Objectives to ensure the continued effectiveness of ODEAM environmental management and performance for 2023 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