



Core Document: - Environmental Management System Overview

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Introduction and Background

Egdon Resources U.K. Limited (“Egdon”) has been exploring for and producing oil and gas from the onshore UK for over 20 years, and are Operators of a number of onshore UK oil and gas sites. These are located mainly within the East Midlands, with additional sites in Dorset and the North East.

All sites and operations are managed by third-parties contracted to Egdon; all activities are undertaken under the umbrella of Egdon’s Health, Safety and Environmental (HSE) Management Systems, which are separate mechanisms with some common documents and procedures. Contractor-specific HSE procedures may be used depending on the activity, but primarily the Egdon Environmental Management System (EMS) will be used on all Egdon sites; Egdon have ultimate responsibility for environmental protection and management.

This document is intended to provide a summary overview of the structure of Egdon’s Environmental Management System.

Environmental Impact

Onshore oil operations, by their very nature, have the potential to cause pollution either into ground, air or water.

Oil exploration and production operations have the potential to pollute through: -

- Spillages on site that permeate soils through to usable near-surface groundwater used for human consumption or that feeds irrigation and food growth;
- Oil and chemical migration through to surface watercourses such as streams, that ends up in rivers, affecting insects, fish, animals and birds;
- Emissions into the atmosphere that can change the local air quality, affecting local communities, or globally contributing to climate change;
- Waste that is produced that is either landfilled, where it can contribute towards leachate and pollution, or not disposed of properly;

Egdon recognises that it has responsibility to ensure that it reduces its impact on the environment as far as is possible, and that environmental issues – and awareness of such – will have an increased profile.

System Structure

Egdon have an established Health, Safety and Environmental Policy which summarises and demonstrates Egdon's commitment to Health, Safety and Environmental management, and to the systems established and implemented to ensure that the aims of the Policy are achieved.

The aim of the Environmental Management System (EMS) is that it enables Egdon to; -

- Ensure compliance with key regulatory controls such as Planning Permissions and Environmental Permits
- Understand the environmental aspects of its operations
- Identify potential environmental impacts
- Set in place measures to reduce or mitigate potential environmental impacts through physical design or by procedural controls
- Monitor environmental impacts or environmentally-related aspects of site operations
- Look to continually assess environmental performance and plan improvements where necessary or possible

The Egdon EMS is defined in four main sections: -

1. Core Documents
2. Procedures
3. Working Documents
4. Records

Structure



Core Documents

The core documents section lists the over-arching documents, or guiding principles, that define how Egdon will manage operational environmental issues. To comply with the conditions and criteria set out within Environmental Permits issued for operational sites, an Environmental Management System must be in place. The Core Documents include: -

- Egdon's joint "Health, Safety and Environmental Policy", that provides a management commitment to environmental management, and sets out core principles that will be adhered to;
- A "Management Structure, Roles and Responsibilities" document, that details the responsibilities within the organisation for managing environmental issues and activities that have the potential to cause environmental impact;
- The "Procedure and Document Structure", which shows all of the individual environmental documents, procedures and the associated working documents that form the system itself, and shows the relationship between them; and



- This “EMS Overview”, which provides a brief introduction to, and overview of, Egdon’s Environmental Management System.

Procedures

This section details the management procedures that set out how operational environmental aspects are implemented or managed. As examples: -

- The “Incident Management” procedure details the responsibility for, and management of, any environmentally-related incident or issues on a site;
- The “Waste Management” procedure sets out how wastes will be managed;
- The environmental checks, inspections and monitoring mechanisms that will be applied are detailed within the “Environmental Monitoring” procedure;
- The “Pollution Accident Management Plan”, which sets out the risks, control measures and the response/actions that should be taken in the event of an incident that causes environmental pollution (either to land, water or air).

Working Documents

These are the documents that “flow” from the procedures, and are used to as working guides, or in order to document activities with an environmental aspect. For example: -

- An “Incident Form”, used to record details of an environmental incident such as a spillage;
- A “Site Inspection Report” to formally record environmental site issues;
- A documented “Environmental Risk Assessment” that sets out the environmental risks on site and how they are managed; and
- The individual test and maintenance activities that are undertaken and applied on site (“Test and Maintenance Schedule”).

These are “living” documents, and so may need repeated minor changes or additions to reflect working practices. However they are absolutely key to the implementation of the management system, as they gather information that demonstrates the implementation of the procedures.

Records

Once a working document has been completed, it becomes a record. Anything that is created or filed that is required to demonstrate that a test, check, inspection or assessment has been completed is a record of the EMS being implemented (e.g. Incident Form, Incident Investigation). All records will be kept for a minimum of three years, or longer if required under regulatory regimes, as covered under Egdon’s Document Control Procedure.

All of the documents used as part of Egdon’s EMS are listed within the Procedure and Document Structure. This is a flexible and fluid document, that allows additional procedures to be added as and when a need is identified. There will be some overlap with Egdon’s Health and Safety System, so some documents may not be listed as they may be primarily part of the Health and Safety System.