

# Saltfleetby Wellsites

Environmental Permit Variation EPR/JB3107XB  
Management Plan

Angus Energy Weald Basin No. 3 Limited

Project number: 60625790

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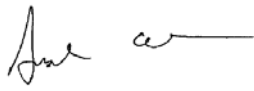
## Prepared by

Nicholas Bell  
Environmental Consultant

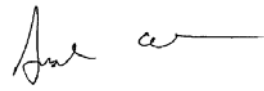
## Checked by

Mike Nutting  
Associate Director

## Verified by

Angela Graham  
Associate

## Approved by

Angela Graham  
Project Manager

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	1	Angus Energy / Tim Hussain
	1	Angus Energy / Nick Mace

**Prepared for:**

Angus Energy Weald Basin No. 3 Limited

**Prepared by:**

Nicholas Bell  
Environmental Consultant  
T: 01159 077193  
M: 07717304360  
E: nick.bell@aecom.com

AECOM Limited  
12 Regan Way  
Chetwynd Business Park  
Nottingham NG9 6RZ  
United Kingdom

T: +44 (115) 907 7000  
aecom.com

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# 1. Report Context

## 1.1 Introduction

AECOM have been commissioned by Angus Energy Weald Basin No3 Limited (“the Operator” or Angus Energy) to prepare an application to vary the existing environmental permit (EPR/JB3107XB/T001) for the mining, extraction and transportation of natural gas and gas condensate from proven underground reservoirs at Saltfleetby Wellsites.

The application is being submitted to cover changes at the existing Gasfield which will facilitate the processing of natural gas to ensure it meets the quality requirements necessary to export the gas into the National Grid.

This report details the Management Plan for the site and should be read in conjunction with the other application documents. The focus of the report is to provide an overview of management responsibility and management techniques to be employed at the site.

## 1.2 Background

### 1.2.1 Existing Operations

Saltfleetby ‘A’ and ‘B’ (“SFA”, “SFB”) onshore production sites were established in 1999. Both sites produce natural gas, water and condensate with two 6” pipelines connecting the SFA and SFB sites. A 10” pipeline transported hydrocarbons to the nearby Theddlethorpe Gas Terminal (TGT) for processing. Gas production at the site was suspended by then Operator Wingas Storage UK Ltd in 2017 due to the closure of TGT.

In November 2019, Angus Energy farmed into the licence and became the Operator of the field with the intention to restart production from the field following the installation of a new pipeline connection to National Grid transmission system (NTS). To facilitate the resumption of operations, the intention is to:

- Keep suspended three of the remaining wells (SF 5, 6 and 7) with the potential for side-tracking any one or all of them.
- Evaluate the commercial case for continued production from Saltfleetby 8 either with or without side-tracking.
- Examine the possibility of the utilising any two of the remaining wells for geothermal heat recovery; and
- Return the existing two producing wells to natural gas and associated condensate production.

### 1.2.2 Proposed New Operations

Since 2017, the processing operations at the nearby Theddlethorpe Gas Terminal (TGT) has ceased. Therefore, to ensure the produced natural gas can be exported into NTS, Angus Energy also intend to:

- install natural gas and condensate processing facilities at SFB Site. This will indicatively include the modification to the existing first stage separator, a set of compressors, a passive dehydration system to remove water, a solid state Joule-Thomson valve allowing for a drop in pressure and temperature to remove heavy hydrocarbons, a condensate stabilisation tower, a new condensate storage unit, produced water storage, a metering and analysis skid, a fuel gas skid, an enclosed ground flare, and some associated pipework manifolding, comms and electrical ancillaries; and
- install up to 750m of pipeline from the existing TGT entry point to the new NTS connection point which is beyond the scope of this permit variation and
- Install power generation equipment to support the above facilities.

## 2. Environmental Management System

### 2.1 Introduction

The Environment Agency has adopted an approach to the Environmental Permitting Regulations 2016 (EPR hereafter) which couples regulatory requirements and a company's voluntary environmental management system. This approach is intended to enable more effective and efficient environmental protection with the management of a regulated installation.

This section of the application provides an overview of regulatory requirements and defines Best Available Technique (BAT) with respect to the site's overall management systems. The information in the following sections outlines the systems at Angus Energy covering environmental, general operations, management and health & safety.

### 2.2 Health, Safety and Environmental Management System

The management system for the site comprises an Integrated Management System (IMS) which has been designed to follow the principles of BS EN ISO 14001:2015 – Environmental Management System, BS OHSAS 18001 – Health & Safety Certification and BS EN ISO 9001 – Quality Management System.

#### 2.2.1 Extent of the HSEMS

The HSEMS applies to all operational activities being undertaken by Angus Energy.

#### 2.2.2 HSEMS Outline

This system will ensure consideration of environmental issues at all stages of management and control including:

Table 1 HSEMS Aspects

System Aspect	Issues Incorporated
Policy	<p>Angus Energy has a policy statement covering health and safety, environment and quality. This policy reflects the principles set out by the main board of Angus Energy.</p> <p>The Policy and its implementation will be reviewed annually and the policy revised and updated as required.</p> <p>The Policy gives a commitment to:</p> <ul style="list-style-type: none"> <li>• Provide visible and effective HSE leadership;</li> <li>• Determine potential hazards to personnel and environment, and put in place control measures, prior to commencing work; and</li> </ul> <p>Pursue continuous improvements in its environmental performance and management system.</p>
Planning	<ul style="list-style-type: none"> <li>• Identification of potential/actual environmental impacts of an activity, including significance;</li> <li>• Identification of legal requirements affecting an activity including the requirements for obtaining a permit or planning permission;</li> <li>• Identification of site controls required to reduce the potential/actual impact, actions required to mitigate any actual issues and actions required to ensure compliance with site legal requirements;</li> <li>• Determination of site resource levels (e.g. manpower, equipment, etc.) required for the above controls to be effective; and</li> </ul>

System Aspect	Issues Incorporated
	<ul style="list-style-type: none"> <li>• Identification of key environmental performance indicators.</li> </ul>
Implementation	<ul style="list-style-type: none"> <li>• Ensuring review of competence requirements and levels for key personnel – including contractors where required;</li> <li>• Provision of adequate levels of training and written instruction to ensure that personnel have knowledge of or access to information required to ensure safe and efficient operation of the facility;</li> <li>• Implementation of process control procedures including records maintenance, and logging of events/issues with the potential to impact on the environment; and</li> <li>• Ensuring effective maintenance of the plant to ensure performance is optimised and risk to the environment especially in the event of plant failure is minimised.</li> </ul>
Monitoring	<ul style="list-style-type: none"> <li>• Emissions monitoring and reporting requirements;</li> <li>• Waste Monitoring – this addresses the ongoing checking of waste produced; and</li> <li>• Non-Compliance and Corrective Action – detailing reporting requirements in the event of an incident (Actual/potential) and the action required to mitigate the issue and prevent a recurrence.</li> </ul>
Auditing	Internal auditing is undertaken by site personnel trained in auditing techniques and is used for an ongoing assessment of the compliance of the site with specified controls, EMS and legal requirements.
Management Review	Management undertakes a review of key data to ensure ongoing effective operation of the facility. The information review will include – audit report, performance against operational targets, risk identification and incident management.
Reporting	Angus Energy will openly report on its health and safety, environmental and social performance through a number of mechanisms, including an Annual report to shareholders containing financial and other business performance information including a summary of environmental performance.



## 3. Organisation and Responsibilities

### 3.1 The Operator

Angus Energy is an independent onshore oil and gas development company focussed on advancing its portfolio of licensed UK assets. Founded in 2009, Angus Energy is an Oil and Gas Authority (OGA) approved operator and a member of United Kingdom Onshore Oil and Gas (UKOOG) – the representative body for the UK onshore oil and gas industry.

The company is currently an operator in three licences in the Weald Basin in the south of England:

- Brockham in PL235;
- Lidsey oil field near Bognor Regis (PL241); and
- Balcombe near Crawley (PEDL244).

Angus also has an interest in PEDL143 in Surrey.

### 3.2 Management Commitment

Angus operate an integrated management system which fully integrates Safety, Health, Environment and Quality. This system is subject to annual audit and review.

The senior management are committed to high standards of protection for people and the environment which is further defined in company policies and procedures. The key commitments include:

- Establishment of management systems to aid control of safety, health, environment and quality;
- Communication of information to those that work on behalf of the organisation that could impact on these systems;
- Selection criteria for personnel within key roles supported by appropriate training;
- Objectives and targets to drive continual improvement; and
- Allocation of resources to ensure systems are implemented and developed to a high standard.

### 3.3 Roles and Responsibilities

Roles and responsibilities within the management system are defined within the management system procedures and documented in specific employee job descriptions. Key roles are:

- The Managing Director has overall responsibility for the Saltfleetby Wellsite and Facilities including compliance with management system procedure and allocation of necessary resources, including those required to operate the HSEMS, monitor performance of the system and the need for improvements
- The Technical Director has over responsibility for the technical and operational assurance for the Saltfleetby Wellsite and Facilities.
- The Operations Director is responsible for the day to day operation of the facility and reports through to the Managing Director.
- The Maintenance Co-ordinator is responsible to the Operations Manager for ensuring that all plant and equipment is maintained and controlled under a preventative maintenance system. The Maintenance Manager is responsible for monitoring all maintenance schedules and procedures
- The Technical Manager is responsible for ensuring that modifications and additions to plant equipment are designed, commissioned and maintained to the standards defined in statutory requirements, relevant British Standards, Codes of Practice, Guidance Notes and Company Standards.

## 3.4 Training and Competence

### 3.4.1 Skills and competency development

The Operator aims to achieve a high success rate of individual and job compatibility at the recruitment stage. This selection will then be complemented by providing training to meet priority needs for each individual dependant on the job requirements. The needs will be identified during the individual's appraisal and can be defined as:

- Mandatory; or
- Job based; or
- Skills based.

To support the effective identification and implementation of the training and development programme, the system will be reviewed annually by plant management, taking into consideration:

- The results of audits;
- Agreed appraisal targets and objectives;
- Defined site operating standards;
- Recommendations from Angus Energy corporate level; and
- Any changes to site operations (e.g. process developments, changes to legislation, etc).

Following this review an annual training plan will be agreed detailing the training areas, target audience and timeframe for completion.

### 3.4.2 Training Provision

All staff will receive instruction and training, both verbal and documented, in all relevant aspects of operational procedures, permit requirements in relation to operations and the environment, health and safety and general requirements of the site management plan. A copy of the permit and approved site management plan will be kept available on site for reference when required by all site staff carrying out work under the requirements of the permit.

Wherever possible, training will be delivered in the workplace by internal training staff or by managers.

Senior staff and other key personnel will attend formal training courses as required to develop technical, managerial and health and safety skills. These will include external courses as well as in-house training programmes.

The Operations Director will ensure that site staff are directed and trained in relevant emergency procedures for their particular site or activity. These procedures will be documented within the Site Operational Plans, and periodically reviewed.

The records of personnel and their skills will be maintained so as to ensure that skills and tasks are adequately matched, and the effectiveness of any training undertaken.

### 3.4.3 New Employees

Each position at the site will be covered by a general job description detailing key skills, responsibilities and reporting structure. It will be standard procedure for new process operators to be given comprehensive "on the job" training before they take full responsibility for their post. Supervision will be provided for as long as is necessary to ensure that the required skills have been imparted. In addition, specific full training on key tasks will be given to both new and experienced operators as necessary.

### 3.4.4 Contractor Management

Contractors which may be used will be selected on the basis of their experience and competence relating to a specified task. Each will submit a relevant method statement which is retained and crosschecked by the Operator.

Site rules will be provided to all contractors using or visiting the site, which will describe basic safety and operational precautions to be observed while at the site. Instances of drivers or contractors not following site rules, or behaving inappropriately, will result in warnings and formally reported. If necessary, requests to leave site and/or barring from future visits to the site will be implemented.

## 4. Operational Controls

### 4.1 Operational Control

#### 4.1.1 Trained Operators

There is reliance upon trained staff to operate the plant and bring to the job a considerable body of expertise to ensure correct and proper procedures for operating equipment are followed.

#### 4.1.2 Operating Procedures

To enhance the work / process experience provided by operators, procedures are defined covering relevant aspects of the operation to ensure safe operation and to minimise the risk of impact on the environment. Such procedures will be subject to periodic review.

### 4.2 Maintenance and management

Maintenance management for the facility will include:

- A series of maintenance procedures will be maintained for the main items of plant at the site including mobile and fixed plant equipment. This procedure will provide an indication of reference documents along with procedural steps including who will undertake the work, the relevant mechanism for recording the information and the action/reporting to be completed if an issue is identified.
- There will be a significant element of planned preventative maintenance to ensure high standards of performance.
- Maintenance scheduling will be undertaken making reference to statutory requirements, manufacturer's recommendations and from plant history.
- Following maintenance, details of work undertaken will be recorded.
- Monthly reports relating to maintenance activities and effectiveness are provided to senior management including any recommendations for further action.
- All plant items will be serviced and maintained according to manufacturer's schedules and recommendations. Plant and equipment will be inspected and serviced by Angus Energy utilising a plant inspection pro-forma.

### 4.3 Monitoring and Control

#### 4.3.1 Control systems

The site is controlled via semi-automatic control systems. These systems are programmed with:

- Optimum plant operating criteria;
- Process control monitoring capability to ensure effective combustion in the gas engine and flare; and
- Process trips and interlocks.

CCTV is installed at key points and is used to ensure that operatives and supervisors have good visual feedback on all areas of the site.

The semi-automated systems are backed up by manual supervision from fully trained process operators.

#### 4.3.2 Emissions Monitoring

A Site Protection and Monitoring Plan (SPMP) will be prepared for the facility which details the requirements for infrastructure and emissions monitoring. Where monitoring is undertaken by third party specialists (e.g. air emissions or groundwater sampling), these will be completed in accordance with relevant standards.

### 4.3.3 Audits

Periodic audits are undertaken to verify the operation of the management system, compliance with requirements and to assess effectiveness. The Managing Director, with the use of appropriately skilled resource, will establish the audit programme, ensure that it is carried out, and report the outcome to the management. The auditors will report their audits to the Operations Director and the Managing Director who will formulate any corrective actions necessary and report on their completion. During audits all personnel will be expected to identify any need for improvement.

## 4.4 Physical Control Measures

### 4.4.1 Physical Protection Measures and secondary containment

Physical on-site arrangements have been designed to maintain a high level of operational efficiency, whilst ensuring that appropriate accident/incident issues have been taken into consideration. These physical arrangements include, but are not limited to:

- a) Designated storage arrangements for specific material types are constructed in accordance with relevant standards, and all vessels and gas and leachate pipelines are appropriately signed;
- b) Physical 'bump' barriers are located adjacent to and surrounding any storage tanks, to minimise the risk of damage to infrastructure integrity, containment and storage arrangements during vehicle manoeuvring – on-site operators are available to supervise vehicle movements where necessary; and
- c) The site is constructed to ensure that all liquid containing tanks are located within dedicated containment areas, each capable of taking 110% of the tank volume in line with current storage guidelines – in addition, the relevant floor areas are designed as effective containment areas, promoting material flow to dedicated drains or sumps in the event of spillage.

### 4.4.2 Prevention of Contamination of Land and Water

The site is supplied with fuel oil as necessary for re-fuelling of site vehicles and fuel for mobile generators. Fuel oil is held in a proprietary double skinned, above ground storage tank with appropriate level monitoring and containment.

All liquids such as lubricants, condensate, etc are stored in an appropriate manner incorporating the use of containment bunding to ensure appropriate containment of spillages or leaks. The potential for accidents, and associated environmental impacts, is therefore limited.

Further measures to limit the potential for accidents are listed below.

- The site has an impermeable concrete base where any spills are contained;
- All liquid storage tanks (e.g. treatment reagents, and condensate) are double skinned or banded to contain 110% of the capacity of the tanks;
- Surface water from western side of the site flows overland to the west and is captured by an open drain adjacent to the land bund. Any surface water not collected by the drain is discharged to filter drain with perforated pipe circling the perimeter of the site to the north, east and south which conveys runoff to the northeast corner, where a penstock valve limits the discharge to the equivalent greenfield runoff rate prior to discharge via a Class 1 oil interceptor to the LMDB land drain;
- Runoff within the eastern part of the site flows overland to a filter drain containing perforated pipe circling the perimeter of the part of the site. The pipe flows to the northwest corner where a penstock valve limits discharge from the filter drain to the equivalent greenfield runoff rate. Flows are then discharged to the central LMDB land drain via a Class 1 oil interceptor;
- Training and equipment is in place to minimise the potential environmental impact in the case of accidents, for example, via the use of spill kits; and

- 'Tray' containment is provided for drums and other small containers of chemicals and general lubricants. These are held in designated stores at the workshop, thus there will be no exposure to rain. Trays are inspected on a regular basis by site-operators to prevent overfilling.
- Any stationary plant or generators left for prolonged periods will have a drip tray (25% of the storage capacity) placed underneath to catch any leaks if appropriate.

#### 4.4.3 Security Measures

Security and emergency procedures have been established as integral parts of the management system. The main security provisions are:

- Access points to the site are protected by lockable steel security gates, and an adjacent notice board clearly display the opening hours of the site – the main access gate will be secured outside operational hours;
- Site boundaries are inspected on a weekly basis – any defects identified made secure immediately, and permanent repairs will be undertaken as soon as practicable;
- Where appropriate, all building doors will be closed and secured outside site opening hours. The site is monitored at all times using strategically placed CCTV cameras. This will help prevent unauthorised access to the operational areas;
- Access to operational areas of the site is controlled by restricting access from the site road as that is the only vehicular access point;
- In the event that evidence of unauthorised access and/or vandalism is identified, the matter will be reported to the General Manager who will then take the appropriate action; and
- All visitors will have to sign a visitor's book and will be inducted prior to being allowed access to the site.

#### 4.4.4 Fugitive Release Control

The need to pay continuous attention to housekeeping in order to minimise emissions is recognised, and as such a high priority is given to housekeeping instruction and supervision. This includes using dust suppression if necessary, during site work over activities.

#### 4.4.5 Site Infrastructure Plan

This application includes site plans and drawings which highlight where the activities will occur. Please refer to Drawings and Plans held within part 10 of environmental application.

## 5. Emergency and Accident Management

### 5.1 Emergency Plan

The system to identify, assess and minimise environmental risks and hazards of accidents and their consequences are detailed in a site Emergency Response documents.

Angus Energy will implement appropriate systems and procedures to address hazards, accidents and safety through instruction, training and information. Some of these are detailed below:

- staff training and instruction;
- routine inspection and testing programs;
- accident investigation and reporting;
- first aid and health training;
- housekeeping, machine safeguards information; and
- fire hazards and chemical handling instruction.

Accidents will be investigated and reviewed by the Operations Director with suitably qualified HSE experts as required. Accidents will be recorded as serious or minor and catalogued into a year-end report. Procedures will be put in place to avoid recurrence.

Emergency Procedures are detailed in the Management System. These have been developed to respond to various types of emergency. In particular, emergencies involving fire will be closely interfaced with Lincolnshire Fire and rescue, Lincolnshire Constabulary and Lincolnshire County Council. Regular checks and tests will be conducted to ensure the procedures are effective.

### 5.2 Incident and Accident Investigation

A thorough reporting and investigation of all accidents and near misses will be conducted to ascertain the cause and methods of preventing reoccurrence or similar accidents. Detailed accident reports and records will be prepared and maintained on site.

All personnel accidents will be recorded and logs maintained on site together with copies of the appropriate statutory form and associated medical data and other information. All serious accidents will be reported to the Managing Director, followed by the standard forms and a more detailed written report, if applicable.

All accident reports will be reviewed by the Technical Director. When required, the Technical Director may initiate an investigation of the accident and co-ordinate management response and support for the site staff as needed.

### 5.3 Continued Validity of the Emergency Plan

The Emergency Plan will be reviewed every four years or following an incident. The results of all reviews are logged in the Emergency Plan as necessary to support continuous improvement.

### 5.4 Staff Emergency Training

Site personnel have been trained in the use of fire-fighting equipment, breathing apparatus where necessary, and first aid. Supervisors will ensure that certificates of competence are maintained up-to-date. All personnel have also been trained in the emergency procedures for the site, including raising the alarm, managing off-site emergency services and site evacuation procedures.

Toolbox talks on fire prevention, fire-fighting instruction and first aid will be provided as refreshers following any such incident or accident and staff will participate in periodic testing of the emergency plan arrangements.

## 6. Non-conformance and Complaints Management

### 6.1 Management of Incidents and Non-Conformances

Non-conformance will be managed in accordance with the Company Procedure. Documentation will be raised and retained to record environmental incidents and work.

Relating to audits, non-conformities will be initially recorded on the Audit Report Form during the audit. The non-conformances will then be transferred to a database for ongoing tracking to final close-out. The close-out of each non-conformance will be verified by the original auditor, where possible, to ensure adequate closure.

Corrective and preventative action will be dealt with in accordance with the Company Procedure. A Corrective Action Report (CAR) will be raised where a system deficiency has been identified during inspections, internal audits, third party audits or customer complaints.

The main elements of this management system will include:

- Reporting the incident/accident;
- The mitigation measures to be taken while dealing with the incident/accident;
- The recording of the incident/accident and subsequent investigation requirements;
- Identification, implementation and recording of relevant corrective action required to prevent a recurrence; and
- Reports will be reviewed by site management or senior management as appropriate and corrective or other action recorded. All reports will be reviewed on monthly basis by senior management.

### 6.2 Complaints Management

All complaints concerning the environmental impact of the Facility will be referred to the Operations Director or a nominated responsible person in his absence. The complaint will be recorded and appropriate action taken as soon as practicably possible. The Management Team will be contacted as required to remedy the situation. The complainant will be contacted to confirm details of action taken and this contact will be recorded. Contact will be made also with the EA and the local Environmental Health Officer as appropriate to the nature of the complaint.

### 6.3 Notification to the Environment Agency

Notifications to the Environment Agency will be made in accordance with Section 4.3 of the site Environmental Permit.

If any of the events identified in the Conditions of the environmental permit occur, the EA will be provided with relevant information.



## 7. Management of Documents and Records

### 7.1 Documented Systems

Documents will be held on the Angus Energy server, which functions as the document management system (DMS). Documents with specific review dates will have this information recorded on the intranet so that this information is available to schedule reviews.

Copies will be distributed to relevant personnel under a document control procedure.

### 7.2 Document Control

Angus Energy maintains procedures for document control, environmental monitoring and training within the management system to maintain a system of environmental records which include the following:

- monitoring of environmental performance according to specified significant effects;
- suppliers details and environmental performance;
- training records;
- audit results; and
- review results.

### 7.3 Environmental Records

Appropriate personnel will complete environmental monitoring site checklists on a daily basis, and the site will be regularly inspected. Problems identified from the inspections will be brought to the attention of the Operations Director for rectification. Copies of the completed forms will be maintained by the Operations Director.

The Environmental Monitoring Checklists will be modified if required to take into account future legislative requirements. Monitoring data will be collected in accordance with appropriate regulations.

Instrumentation used to measure data required for monitoring environmental performance are subject to the inspection and calibration requirements of the Management System.

### 7.4 Maintaining Records

Site operational records will be maintained in written, electronic or other approved format, and will include, but may not be limited to, the following:

- Complaints records;
- Non-conformance and non-compliance records;
- Monitoring data; and
- Site inspections, audits and reviews

Electronic records will be stored on drives which are automatically backed up.

Site operational records will be retained for at least 6 years.

### 7.5 Data Contingency

The document management system (DMS) will be used to control all facility documentation. As facility data is stored electronically, suitable arrangements have been implemented to ensure the data is backed up off-site and maintained for the purposes of business continuity.

When specific documents are required in hard copy format, they will be printed and stored in a site-specific filing system. This same system will be used to store documents that have been generated as hard copy only, (e.g. handwritten inspection logs and documents of external origin).

Documents will be retained for the statutory minimum period of time. Angus Energy has guidance documents for the storage and archiving of documentation. When Angus Energy is required to maintain hard copy archives of project data these will be suitably indexed and then stored in an archive storage facility.

## Appendix A HSE Policy

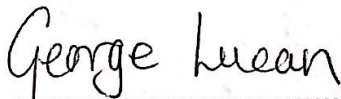
# Health, Safety & Environmental (HSE) Policy

Angus Energy plc is a UK independent onshore oil and gas development company. Angus Energy is committed to conducting its business in a safe and responsible manner. Our goal is to manage our operations such that we cause no harm to people, where we minimise our impact on the environment and are a good neighbour in the communities within which we work.

## To achieve this we will:

- Provide visible and effective HSE leadership by ensuring that health and safety is an integral part of the Angus management arrangements.
- Set out clear roles and responsibilities, outlining how work will be done, profiling the health and safety risks through suitable and sufficient risk assessments.
- Allocating sufficient resources and conduct the necessary training to implement the arrangements.
- Encourage the involvement of all personnel in organising for health and safety with clear communication providing adequate resources and competent advice. Before commencing any activity, we determine the potential hazards to personnel and the environment, and put in place control measures as necessary.
- Hold our employees and contractors accountable for safe and compliant delivery;
- Communicate openly with stakeholders whether internally or externally, that may be affected by our operations.
- Conduct safety audits to check that the arrangements are being implemented, risks are being controlled and that the aims are being achieved.
- Investigate accidents and incidents as part of the health and safety monitoring process.
- Review performance to learn from accidents, errors, experience and other organisations to revisit the arrangements in place and update where necessary.
- Understand the environmental footprint and carbon intensity of our production portfolio and strive for continuous improvement.

Safe operations in all our business activities are a core value. If operational results and safety ever come into conflict, we have a responsibility to choose safety over operational results which will be supported by the organisation at the highest level.



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George Lucan  
Managing Director

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