

7 ISSUE MANAGEMENT AND CONCLUSION

7.1 Introduction

Through a systematic evaluation of the proposed Athena decommissioning programmes activities and their interactions with the environment, a variety of potential sources of effect were identified (Section 5). The majority of these were of limited extent and duration and deemed minor.

Those activities which were identified as being of potentially greater concern were assessed further in Section 6. A number of environmental management actions were highlighted to take forward into Detailed Engineering, and final decommissioning planning and execution (see below). In addition, specific environmental objectives and targets have been set for the decommissioning programmes (Table 2.1 in Section 2).

Predicted environmental effects of the decommissioning programmes are comparable with those from other FPSO and subsea tie-back decommissioning activities on the UKCS. During the assessment process, no potential issues of concern were identified which could not be mitigated to reduce them to meet regulatory requirements and company policy. The risks of spills have been assessed in detail and preventative measures and procedures put in place to minimise the likelihood of their occurrence and possible environmental damage.

7.2 Environmental Management

The proposed Athena field decommissioning programmes will be conducted in accordance with Ithaca's Environment, Health and Safety policy. The Ithaca Environmental Management System is consistent with the ISO 14001:2004 International Standard for Environmental Management Systems.

Various contractors will be involved in the detailed planning and execution of the decommissioning programmes. Ithaca has established contractor selection and management procedures which include evaluations of HS&E aspects and management. Ithaca will review the Environmental Management Systems of proposed contractors for the project to ensure they are robust, consistent with ISO 14001:2004 and have been independently audited and/ or verified.

The specific environmental management actions identified in the ES (primarily in the context of risk management and effects mitigation) will be taken forward into detailed planning and through the project execution phase. Table 7.1 presents a summary of the commitments and actions to be taken forward with responsible individuals or teams.

Table 7.1 – Summary of commitments and actions to be taken forward

Issue	Commitments and Actions	Responsibility
Environmental objectives	Monitor and review performance against project environmental goals Ensure remedial action is instigated where necessary	Ithaca Project Manager & HSE Manager
Contractor management – field operations	Pre-operations audits of rig, and support and construction vessels Prepare bridging documents for drilling and subsea construction contractors Practices to be monitored during operations	Drilling superintendent Subsea Manager

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Issue	Commitments and Actions	Responsibility
Potentially sensitive habitats	Ensure new seabed survey information is reviewed for the potential presence of Habitats Directive Annex 1 habitats or other potentially sensitive habitats/features, and factor this information into project planning if necessary.	Drilling superintendent Subsea Manager
Cultural heritage	Procedures developed to ensure that if any unforeseen prehistoric or later archaeological remains are discovered during decommissioning works they should be treated and reported in line with JNAPC code of practice.	Drilling superintendent Subsea Manager
Pile cutting	Use the Statutory nature conservation agency protocol for minimising the risk of disturbance and injury to marine mammals from pile cutting noise of June 2009 in the planning and conduct of pile cutting operations. Review guidance on the protection of marine European Protected Species from injury and disturbance published in 2010, and implement for the Athena decommissioning activities.	Subsea Manager HSE Manager Ithaca's Environmental Advisers
Site survey	Provide a CD copy of final site survey reports to DECC, Marine Scotland and JNCC	Subsea Manager
Rig, vessel and subsea installation presence	Communicate information on rig and other vessel operations and rig anchoring patterns to fishermen and other users of the area via the Kingfisher Charts, Notices to Mariners and a project awareness laminate (to be distributed to SFF and fishermen). As laid rig anchor positions to be relayed to SFF in Latitudes and Longitudes. Ensure stand-by vessel also has this information. Apply for exclusion zone for the Athena riser base centre..	Project Manager, Subsea Manager & Drilling Superintendent
Hydrocarbon and chemical spill	Prepare and submit Athena drilling P&A OPEP Hold spill exercises and training Spill prevention and bunkering expectations to be raised at pre-operations meetings. Ensure rig and vessels have SOPEPs and on deck spill containment kits. Stand-by vessels to be equipped with appropriate dispersant and spray booms	Project Manager Project Manager & Drilling Superintendent Project Manager, Drilling Superintendent, HSE Manager Logistics Team Leader Logistics Team Leader
Drilling, cementing	Complete chemical risk assessments as part of final chemical selection. Apply for Term Permits using PON15B. Collate data and submit EEMS reports.	Drilling Superintendent
Construction or drilling debris	Ensure any items of equipment or materials lost overboard are reported to the Ithaca representative. Conduct seabed debris clearance surveys around the wells, the subsea manifold, flowlines and STP buoy anchor suction cans locations. Recover all significant items of debris located. Prepare debris survey and clearance reports.	Drilling Superintendent & Subsea Manager

Issue	Commitments and Actions	Responsibility
Waste procedures	<p>Waste management expectations and procedures to be raised at pre-mobilisation meetings</p> <p>Monitoring of waste management practices and ensure appropriate documentation and record keeping</p> <p>Periodic audit of waste handlers and disposal companies</p> <p>Collate data and submit EEMS reports to DECC and include in Ithaca annual environmental performance report</p>	<p>Materials Coordinator</p> <p>Safety Training Coordinator</p> <p>Ithaca's Environmental Advisers/Project Team</p> <p>Ithaca's Environmental Advisers</p>
Bunkering	Audit of, rig support and supply vessel bunkering procedures	Operations manager & Drilling Superintendent
Construction vessel and rig emissions	<p>Coordination of decommissioning programmes activities to ensure efficient use of vessels.</p> <p>Select where possible low sulphur fuels for vessels and rigs.</p> <p>Collate rig fuel use data for submission of EEMS report</p>	<p>Subsea Manager</p> <p>Purchasing and Logistics Team Leader</p> <p>Drilling Superintendent</p>
Subsea flowlines	Continued consultation with fishermen's organisations regarding flowline removal during detailed design and through Pipeline Works Authorisation process.	Subsea Manager
Hydraulic fluid	Monitor release during disconnection and isolation operations.	OIM
Post project environmental review	<p>A post decommissioning programmes, drilling P&A and removal activity review to be carried out to assess the accuracy of ES predictions in the context of actual emissions, discharges, durations etc. The review also to assess the extent to which commitments made in the ES have been implemented. The results of the review will be used to guide future Ithaca project EIA/ESs.</p> <p>Report chemicals used and discharged, atmospheric emissions and waste returns to DECC and include in Ithaca annual environmental performance report.</p>	<p>Ithaca's Environmental Advisers/Ithaca Drilling Adviser/Project Manager/Team</p> <p>Ithaca's Environmental Advisers</p>

7.3 Overall Conclusion

The overall conclusion of the Environmental Assessment is that, with the implementation of the proposed mitigation and risk reduction measures (Table 7.1), the decommissioning programmes for the Athena field and the P and A of the wells will not result in significant adverse effects on the environment or other users of the area.

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