

**HEALTH & SAFETY AND
ENVIRONMENTAL MANAGEMENT SYSTEM**

WARWICK ENERGY LIMITED

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HEALTH & SAFETY AND ENVIRONMENTAL MANAGEMENT SYSTEM

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1. DISTRIBUTION LIST

	<u>POSITION</u>	<u>LOCATION</u>
1.	OPERATIONS MANAGER	HEAD OFFICE, WELLESBOURNE
2.	PRODUCTION OPERATORS	CAYTHORPE GENERATING STATION
3.	PRODUCTION OPERATORS	TRUMFLEET GENERATING STATION
4.	PRODUCTION OPERATORS	ELSWICK GENERATING STATION
5.	PRODUCTION OPERATORS	KNYPERSLEY GENERATING STATION
6.	PRODUCTION OPERATORS	PYE BRIDGE GENERATING STATION
7.	PRODUCTION OPERATORS	BENTINCK GENERATING STATION

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2. INTRODUCTION

The **Health & Safety And Environmental Management System** is a formal system which has been developed to implement the Company Health & Safety and Environmental objectives defined in the **Health & Safety and Environmental Policy Statement**.

It establishes responsibility levels, standards to be used, procedures to be established and followed to ensure safe and environmentally acceptable operations, and the systems of reporting and auditing to ensure effective management of all safety and environmental risks within the company.

The System is divided into four sections. These are:

- **ORGANISATION** - this describes the company's **Health & Safety and Environmental Policy** and the organisation required to implement and ensure compliance with the **Health & Safety And Environmental Management System**.
- **IMPLEMENTATION** - this defines the responsibilities of the line managers and supervisors with regard to health & safety and environmental matters and describes the procedures necessary for the effective management and control of health & safety and environmental risks in all aspects of the company's operations.
- **COMPLIANCE** - this describes the legislative and other statutory requirements applicable to the operations and the requirements for data gathering and reporting.
- **REVIEWS** - this describes the way in which reviews are carried out in order to ensure compliance with the system and with internal and external targets, and as a mechanism for the re-assessment of corporate policies and objectives.

The Management System framework is attached as Appendix 1.

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3. ORGANISATION

Health & Safety and Environmental Policy Statement.

WARWICK ENERGY Limited is committed to performing its work in the safest practicable manner consistent with good industry practice, to protecting the health of its employees and contractors, and to minimising any adverse impact on the community and the environment from its operations.

In support of this statement Warwick Energy Limited has therefore adopted the following policies.

Management and Responsibilities

We will manage our health, safety and environmental risks with equal ranking as our other corporate objectives.

We will make personnel aware that health & safety and environmental management is a line management responsibility.

We will ensure that all specific responsibilities identified in the Health & Safety and Environmental Management System are clearly assigned.

Reduction of Health, Safety, and Environmental Risks

We will take full account of health & safety and environmental risks in all aspects of our operations. This includes design, construction and installation of facilities as well as the operation of process plants and well activities such as drilling and work-overs.

We will take into account health and safety and environmental performance when selecting contractors and equipment and material suppliers.

We will implement and maintain procedures to minimise the risk of accidental spillages and emissions and we will maintain appropriate emergency response and clean-up plans in case of an accident.

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We will ensure that all personnel are appropriately trained to carry out their work correctly and to recognise the health and safety and environmental implications of incorrect actions.

Compliance and Reviews

We will comply, as a minimum, with statutory regulations and will work with statutory bodies to develop effective and appropriate health & safety and environmental legislation.

We will carry out reviews and analysis of all accidents and incidents, including near misses, and will update policies and procedures as necessary.

We will establish a Health & Safety and Environmental Management Committee which will periodically review the performance of the Health & Safety and Environmental Management System and which will propose changes and new targets as appropriate.

We will ensure that all personnel are fully briefed on the performance of our Safety and Environmental Management System. We will organise periodic Site Safety and Environmental meetings where health, safety and environmental issues can be discussed.

**The general statement and policies shown above was signed by Rob Jones,
Director of Warwick Energy Limited on 12th April 2001.**

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4. IMPLEMENTATION

4.1 STANDING INSTRUCTIONS

Standing Instructions are the site specific rules and as a minimum must contain instruction covering:-

- (a) Reporting of accidents and incidents.
- (b) The Permit to Work System.
- (c) Materials Handling Safety Precautions.
- (d) Use of safety equipment and protective clothing.
- (e) Site rules covering Contractor activity.
- (f) Waste disposal

4.2 EMERGENCY PROCEDURES MANUAL

A site specific Emergency Procedures Manual has been prepared for each operational well site. This takes into account the need to minimise the environmental emissions arising from the emergency situation as well as minimising the risk to personnel.

4.3 PROJECT REVIEWS

The designated Project Manager will take environmental risks into account in all phases of project design and implementation. The environmental issues will be reviewed as part of the routine Project Safety Review Procedures.

4.4 OPERATING AND MAINTENANCE INSTRUCTIONS

A clear and comprehensive set of Operating and Maintenance Instructions will be prepared for all equipment in use on all of the operating well sites. These instructions will be prepared in conjunction with risk assessments of the tasks to be carried out.

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4. IMPLEMENTATION (Continued).

4.5 TRAINING OF PERSONNEL

All Warwick Energy Limited personnel employed at the operating well sites will be sufficiently trained in the hazard and risk aspects of site operations prior to carrying out operational duties.

Training may be a combination of on the job training under supervision as well as formal class based training. All personnel will be trained to meet, as a minimum, statutory training requirements.

4.6 RISK ASSESSMENTS

A risk register manual has been prepared for the operating well sites thereby allowing quantification of the hazards and potential for harm of the activities associated with operating and maintaining the plant.

5. COMPLIANCE

5.1 LEGISLATIVE REQUIREMENTS

A library of all pertinent Health & Safety and Environmental legislation will be maintained at the Company Head Office. The Operations Manager will be responsible for ensuring that all new health & safety and environmental legislation with reference to Warwick Energy Limited operations is added to the library and that a summary is circulated to all operating personnel. Information on best industry practice will also be sought.

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5. COMPLIANCE (Continued)

5.2 SITE/OPERATIONS SPECIFIC REQUIREMENTS

There are a number of consents and conditions which apply specifically to each operating well-site, copies of these will be retained at the Company Head Office and at each well-site as appropriate. These include:

- IPC Authorisation Application and Supplementary Information
- IPC Authorisations
- Planning consents and Section 106 Agreements
- Abstraction and Discharge Consents
- Waste Disposal Licences
- Company Policies and Procedures

5.3 BACKGROUND DATA

An inventory of all available background environmental data will be maintained.

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5. COMPLIANCE (Continued)

5.4 TARGETS AND PERFORMANCE OBJECTIVES

ENVIRONMENTAL TARGETS

Specific environmental targets are established in the following documents:

- IPC Authorisation
- Planning Consents
- Discharge Consents

HEALTH & SAFETY TARGETS

It is the objective of Warwick Energy Limited that all well sites be zero injury sites. All accidents and incidents, including near misses, will therefore be fully investigated via the reporting system and Health & Safety and Environmental Management Committee to ensure a regime of continuous improvement.

5.5 DATA GATHERING

Much of the environmental data will be recorded continuously on the site control and display systems. Written instructions will be prepared to ensure consistency in method of all manual data gathering requirements. All data gathering/analysing equipment will be re-calibrated as per manufacturers' recommendations to ensure accuracy remains within prescribed limits.

All Health & Safety data, eg accidents, incidents or training will be recorded and discussed at the on site Health, Safety & Environmental Management Committee.

5.6 WASTE

The Production Manager will maintain a Duty of Care Register for all waste produced at the operating well sites.

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5. COMPLIANCE (Continued)

5.7 REPORTING

All measured environmental emissions will be recorded on a standard report format for issue to the Environment Agency as required by the operating consents. All data will be kept on site for a minimum period of four years.

The preparation of these reports is the responsibility of the Production Manager who is also responsible for ensuring the accuracy of the data.

Reporting of accidents and incidents will be encouraged, with all such reports investigated by management. All accident and incident reports, plus the results of the subsequent investigations, will be retained by the Operations Manager.

6. REVIEWS

6.1 INCIDENTS

All incidents (or near-misses) with Health & Safety and Environmental implications will be reported on and investigated. The initial report and investigation will be carried out by the Supervisor concerned. The investigation will attempt to identify the cause of the incident and will also recommend any changes to operational procedures. These reports will be discussed at the Health & Safety and Environmental Management Committee meetings.

6.2 HEALTH & SAFETY AND ENVIRONMENTAL MANAGEMENT COMMITTEE MEETINGS

Periodic meetings will be held at each operating well site chaired by the Operations Manager. All health & safety and environmental issues associated with current and proposed site operations will be reviewed. Minutes will be prepared and circulated to all operational personnel.

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6. REVIEWS (Contd)

6.3 NON-COMPLIANCE

Non-compliance with any prescribed IPC Authorisation or any other externally or internally set target will be investigated initially by the Production Manager. All reports of non-compliance and follow-up investigations will be formally documented.

Similar to reporting of accidents and incidents all Health & Safety non-compliance will be investigated by management with the results of such investigations retained by the Operations Manager.

6.4 CONTINUED IMPROVEMENT

Warwick Energy Limited is committed to seeking continuous improvement in the Health, Safety & Environmental management systems. This will be achieved through review of accidents/incidents and non-compliances and through regular audit of the systems, and through the Health & Safety and Environmental Management Committees.

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APPENDIX 1: MANAGEMENT SYSTEM FRAMEWORK

**HEALTH & SAFETY
AND ENVIRONMENTAL POLICY**

|
| Contained Within the:-
|

**HEALTH & SAFETY
AND ENVIRONMENTAL MANAGEMENT SYSTEM**

|
| Enacted through:-
|

PROCEDURAL SYSTEMS

|
| Including as a minimum:-
|

Operating & Maintenance Instructions
Work Instructions/Programmes
Method Statements
Environmental Reporting
Pressurised Systems Dossier
Emergency Procedures Plan
COSHH Manual
Risk Register

|
| Effectiveness assessed by:-
|

Review and Control

|
| To include:-
|

Internal/External Audits
HSE Committee Meetings
Accident/Incident Reports
Risk Assessments