Environmental Report - Article 12.11 Lease Agreement Completed 2020 & Forecasts 2021





HYDROCARBON RESEARCH AND EXPLOITATION PROGRAM IN THE TERRITORIAL AREA "IONIAN"

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TABLE OF CONTENTS

CHAPTER 1. INTRODUCTION	3
	4
	2.2. Environmental Works 2020
CHAPTER 3. DESCRIPTION OF ENVIRONMENTAL WORK PLANNING FOR THE YEAR 2021 3.1. Work Program for the Year 2021 3.2. Scheduled Environmental Works for the Year 2021	
	8

Environmental Report - Article 12.11 Lease Agreement Completed 2020 & Forecasts 2021

CHAPTER 1. INTRODUCTION

On October 10, 2019 the Greek State through Law 4629/2019 (Government Gazette A 154/10.10.2019) ratified the assignment of the rights for the exploration and exploitation of hydrocarbons at the offshore area of Western Greece (IONIAN Block) to the companies Repsol Exploracion S.A. and Hellenic Petroleum S.A. and subsequently transferred to Repsol Greece Ionian S.L (approval of this transfer granted by the Minister of Environment and Energy by virtue of the Decision with Protocol Number 31241/40/27.03.2020) and Helpe Ionian S.A.

Article 12 of the lease agreement describes the requirements of the Greek State for environmental protection issues. This report is prepared in accordance with the requirements of paragraph 11 of the above article, which states:

"The Lessee shall include in each Annual Work Programme and Budget to be submitted to the Lessor, an environmental report on the work to be undertaken as provided in that document, as well as on the work undertaken in accordance with the preceding Annual Work Programme and Budget."

This environmental report describes the following:

- The environmental works undertaken by the contractor of the program in the year 2020.
- The environmental works that are planned to be implemented in the year 2021, according to the relevant Annual Work Program of 2021.

Environmental Report - Article 12.11 Lease Agreement Completed 2020 & Forecasts 2021

CHAPTER 2. DESCRIPTION OF ENVIRONMENTAL WORKS OF THE YEAR 2020

2.1. Work Program 2020

During 2020 the following works have been accomplished in preparation for the execution of the planned seismic works:

- ✓ Design of seismic campaign
- ✓ Environmental works in preparation for the seismic activity

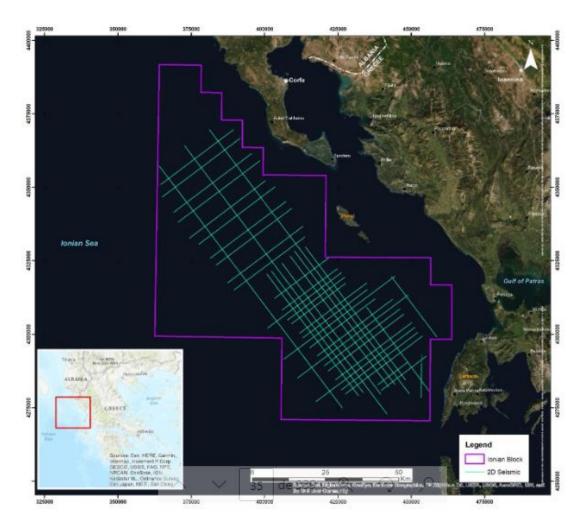


Figure 1. Map of the Proposed 2D Seismic Lines

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2.2. Environmental Works 2020

No works were implemented within 2020, with potential effects on the natural and man-made environment of the area "Ionian".

The works implemented within 2020 consisted in:

- The preparation of the Environmental Baseline Report (EBR)
- The preparation of the Environmental Action Plan (EAP), and its submission for approval to HHRM (protocol no: HHRM 7461/24.07.2020); approval is still pending.

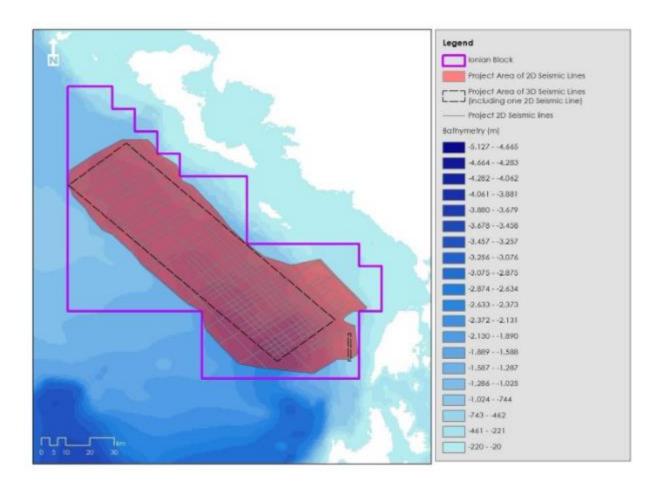


Figure 2. Study area considered for the purposes of the EAP

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Environmental Action Plan

The Environmental Action Plan has been prepared following Legal requirements and international standards, covering:

- Monitoring Plan, before starting activities and during their execution. Main items of the monitoring team
- Roles and Responsibilities
 - Monitoring of the project will be carried by a Project Management, Safety and Environment supervision and coordination team, including Marine fauna observers, and Stakeholder Management team including a social coordinator and Fisheries Liaison Office
- Communication plan, including:
 - Communications to/from Repsol contractor
 - Communications plan from Repsol to Authorities, about the progress of activities,
 main findings, and the results of the monitoring program
 - o Communications plans and coordination from Repsol and/or Contractor sides to stakeholders, with specific Fisheries Liaison Officer (FLO) from Contractor side
 - o Stakeholder Engagement Plan
- Reporting plan, including routine, incidents, and non conformances reporting
- Waste Management plan
- Evaluation of impact of field activities to the mapped vulnerable agents, grouped in :
 - Marine fauna
 - Protected areas
 - o Tourism
 - o economy
- Mitigation Plan for the risks identified
- Evaluation of residual risks after implementation of the Mitigation Plan

Below is a short summary of the risks identified for the planned activities of the project (figure 3), and for accidental hazards (figure 4), before implementation of the Mitigation Plan and after its implementation.

Environmental Report - Article 12.11 Lease Agreement Completed 2020 & Forecasts 2021

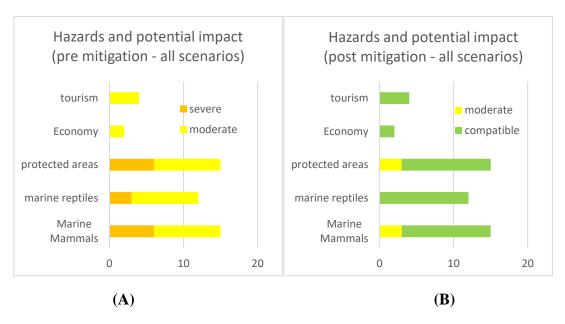


Figure 3. Summary of initial (A) and Residual (B) risks of the 2D seismic in "Ionian" block

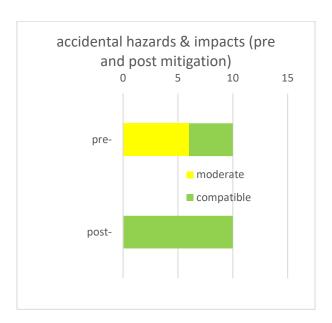


Figure 4. Summary of pre- and post-accidental risks of the 2D seismic in "Ionian" block.

Environmental Report - Article 12.11 Lease Agreement Completed 2020 & Forecasts 2021

CHAPTER 3. DESCRIPTION OF ENVIRONMENTAL WORK PLANNING FOR THE YEAR 2021

3.1. Work Program for the Year 2021

According to the work programme for the year 2021, the following works are foreseen within the contractual obligations of the Contractor of the research program, once the EAP approved by the Ministry:

- ✓ Seismic survey preparatory works, including Tendering and operational plans
- ✓ Seismic survey execution, forecasted for end 2021 early 2022

3.2. Scheduled Environmental Works for the Year 2021

As it appears from the previous paragraph, no works are planned that can cause any interaction with the natural and man-made environment prior to the receipt of approval of the EAP.

Environmental works will be limited to the:

- Preparation of a Stakeholder Engagement plan
- Preparatory works for contracts and operational planning in the event of Ministry approval of EAP

After approval of EAP, environmental works will be corresponding to the planning and execution of the 2D seismic:

- Services tendering, Mitigations planning in observance of approved EAP
- Execution of Monitoring and Mitigation plans in observance of approved EAP