

INFORMATION
on disputable environmental problems (situations) in the area of operations of “Surgutneftegas” PJSC

No.	Date	Disputable situation	Viewpoint of “Surgutneftegas” PJSC
for 2017			
9	I Quarter 2017	Protests of indigenous population and “Greenpeace of Russia” against the changes in land-use planning of Numto nature park approved by the Decree of the Government of Khanty-Mansiysky Autonomous Okrug – Yugra and intentions of Surgutneftegas to start oil production within the park.	References to protests of the indigenous population published in mass media lack any signatures of representatives of the small-numbered indigenous peoples of the North living within Numto nature park (hereinafter – Park) or in Beloyarsky District where the Park is located. The speech of Greenpeace of Russia given on 12.07.2017 does not include any facts confirming the oppression of rights of the small-numbered indigenous peoples of the North or destruction of places of living of the small-numbered indigenous peoples of the North in the areas of lakes of Numto and Imlor.
11	12.07.2017	Speech of Greenpeace of Russia at the 10th session of the United Nation’s Expert Mechanism on the Rights of Indigenous Peoples with the report on Russian indigenous peoples losing the places of their traditional living, including sacred natural areas such as lakes Imlor and Numto. V. Chuprov, a representative of Greenpeace of Russia and Save Pechora Committee gave a speech in which he suggested to dismiss the plans on oil production within the territories that have the most value for the indigenous peoples.	Works on developing infrastructure at the Vatlorskoye field started in 2004, development of the oil and gas field started in 2008. Numto nature park is a positive example of cooperation between indigenous people and subsoil users. Scientific researches confirm absence of significant man-made impact on the ecosystem of the Park. “Surgutneftegas” PJSC constantly interacts with indigenous people living within the Park, including Numto national village. There are no claims or discontent of residents, related to the Company’s operation in the Park, including changes in land-use planning of the Park. In accordance with socio-economic agreements with Beloyarsky District and Administration of the Park, the Company granted more than RUB 215 million over 13 years to representatives of the small-numbered indigenous peoples of the North living within Numto nature park. This amount includes allowances and costs of construction of village hall in Numto village, Park’s visitor center, pre-fabricated residential houses, post office, first-aid station, delivery of building materials, fuels and lubricants to the residents of the Park, as well as aviation and motor

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			<p>transportation to the residents of Numto village.</p> <p>In 2017, "Surgutneftegas" PJSC didn't receive any official appeals concerning the Company's operations within the Park or lake Imlor from Greenpeace of Russia or representatives of the small-numbered indigenous peoples of the North.</p> <p>Environmental authorities lodged no claims against the activities of "Surgutneftegas" PJSC within the Park and in the area of lake Imlor in 2017; there were no cases of violation of environmental legislation as well as regimes of functional areas of the Park.</p> <p>Within its operation in the Park and in the area of lake Imlor, "Surgutneftegas" PJSC strictly observes the regimes of functional areas of the Park and objects of a cultural heritage "Sightseeing attraction "Numto" and sightseeing attraction "Sacred Lake Imlor".</p> <p>The Company's oilfields do not overlap with Lake Numto and "Sightseeing attraction "Numto". All facilities of "Surgutneftegas" PJSC are located at a significant distance.</p> <p>Upon the initiative of "Surgutneftegas" PJSC working groups in municipalities that take part in considering all issues from representatives of the small-numbered indigenous peoples of the North were created. In 2017, there were no official appeals to the working groups regarding the activity of the Company.</p> <p>Film clips and media publications about the activities of "Surgutneftegas" PJSC within Numto nature park are available on the official website of "Surgutneftegas" PJSC in section "Environment", subsection "Specially protected natural reservations, Numto nature park".</p> <p>https://www.surgutneftegas.ru/responsibility/ecology/osobo-okhranyaemye-prirodnye-territorii/prirodnyy-park-numto/</p> <p>Film clips and media publications about the activities of "Surgutneftegas" PJSC within the area of lake Imlor are available on the official website of "Surgutneftegas" PJSC in section "Environment", subsection "Cultural heritage sites", "Sightseeing attraction "Sacred Lake Imlor".</p> <p>https://www.surgutneftegas.ru/responsibility/ecology/vzaimootnoshenie</p>

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			-s-kmns/obekty-kulturnogo-naslediya/dostoprimechatelnoe-mesto-svyashchenoe-ozero-implor/
12	20.03.2017	<p>Greenpeace of Russia approached the UN experts with a letter on the rights of indigenous peoples regarding the situation with shaman S.Kechimov, who protests against the activity of Surgutneftegas within the area of lake Imlor.</p> <p>On March 20, 2017, Greenpeace of Russia started the collection of signatures under the joint letter to the team of the UN experts on the rights of indigenous peoples, which calls attention to the criminal case against the representative of Khanty peoples – Sergey Kechimov (shaman and keeper of Sacred Lake Imlor) initiated after his repeated attempts to record law infringements of "Surgutneftegas" PJSC which performs its activity within the area of the lake.</p> <p>In February 2017, Surgut district court of KhMAO found Sergei Kechimov guilty of murder threat in autumn 2014 against the employees of Surgutneftegas who worked within the area of lake Imlor, sacred to Khanty and Mansy. Moreover, he shot the dog of one of the employees. Kechimov was sentenced to community service, but was freed from the penalty based on the act of amnesty in connection with the 70th anniversary of the Victory in the Great Patriotic War.</p> <p>Kechimov did not plead guilty. He</p>	<p>The criminal case against S.V.Kechimov, was brought under Article 119 of Criminal Code of the Russian Federation upon the murder threat against the citizen. "Surgutneftegas" PJSC is not a participant in this criminal case. Due to the requirements of the Code of Criminal Procedure of the Russian Federation, in cases of the said category legal persons do not participate in criminal procedure, because the object of the offense in this case is citizen's life and health. Criminal cases under Article 119 of the Criminal Code of the Russian Federation are not criminal cases of private prosecution and are initiated where there is any information and without application of the victim. "Surgutneftegas" PJSC is irrelevant to this case and was not involved in preliminary investigation on this case and does not possess any information on the case.</p> <p>Actions of Greenpeace of Russia and S.V.Kechimov in the attempt to associate the activity of "Surgutneftegas" PJSC within the area of lake Imlor with the criminal offence of Kechimov were aimed at the PR campaign to the benefit of Greenpeace of Russia and avoidance or reduction of criminal penalty for S.V.Kechimov.</p> <p>Statement of the fact that the dog killed by S.V.Kechimov belonged to the employee of "Surgutneftegas" PJSC is an absurd that lacks evidence and rational explanation of how it was established that the dog belonged to the employee of "Surgutneftegas" PJSC. Also, there is no evidence that the dog actually killed the deer.</p> <p>At the facilities and within the area of activity of "Surgutneftegas" PJSC, including the vicinity of the cultural heritage site of local significance, the sightseeing attraction "Sacred Lake Imlor", employees of "Surgutneftegas" PJSC are forbidden to keep or feed dogs and wild animals. To provide control over the area, an industrial environmental control group was established. It constantly patrols the territory for the purpose of environmental legislation compliance, including timely registration and capture of stray dogs.</p> <p>In 2017, "Surgutneftegas" PJSC didn't receive any official appeals</p>

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		<p>believes that there was no murder threat. He tried to stop the works that caused a negative impact on the environment of the sacred lake. As for the killed dog, it was his response to the fact that the dog bit to death Kechimov's deer.</p>	<p>concerning the Company's operations near lake Imlor from Greenpeace of Russia or representatives of the small-numbered indigenous peoples of the North.</p> <p>Environmental authorities lodged no claims against the activities of "Surgutneftegas" PJSC within the area of lake Imlor in 2017; there were no cases of violation of environmental legislation within the area and territory of sightseeing attraction "Sacred Lake Imlor".</p> <p>Construction of all facilities in the area of the cultural heritage site of local significance, the sightseeing attraction "Sacred Lake Imlor", located within communal family land No. 6R, is agreed upon with S.V.Kechimov and other seven heads of communal family land No. 6R. Agreement on construction of facilities is documented, including financial documents, confirming the payment of compensation.</p>
13	18.07.2017	<p>Publication of information under the headline "About 5 hectares of oil-contaminated lands found near Lyantor" on the website of the public organization "Green front", stating that the volunteers from Interregional public organization "Green front" discovered a lake with visually "dark" shoreline and lots of "oil spots" on the sand near the lake within the area of 5 hectares near the town of Lyantor at the oilfield of OGPD "Lyantorneft".</p> <p>On 20.07.2017 – publication of information under headline "Prirodnadzor of Yugra will inspect the oil spill near the facility of "Surgutneftegas" that tells about the inspection of oil contaminated land within the area of 5 hectares conducted in cooperation with Prirodnadzor of Yugra. Oil and gas production divisions "Lyantorneft" and "Nizhnesortymskneft" are suspected of</p>	<p>On 21.07.2017 in order to confirm the information on the oil contamination near the town of Lyantor, published on the website of Interregional public organization "Green front", Prirodnadzor of Yugra conducted the inspection of the area and performed sampling of soil, as part of surveillance works.</p> <p>Prirodnadzor of Yugra conducted administrative investigation under Part 2, Article 8.31 of Administrative Offenses Code of the Russian Federation (contamination of forests with wastewater, chemical, radioactive and other hazardous materials).</p> <p>Department of Rosprirodnadzor for KhMAO-Yugra conducted administrative investigation under Article 8.5 of Administrative Offenses Code of the Russian Federation (non-disclosure or failure to submit full and accurate information on condition of environment and natural resources) as well as under Part 1, Article 8.7 of Administrative Offenses Code of the Russian Federation (failure to perform or late performance of land reclamation).</p> <p>Following the investigations, the facts of violation of environmental legislation were not confirmed, therefore legal proceedings on administrative violations against "Surgutneftegas" PJSC were terminated.</p> <p>Upon the publication of articles on the website of Interregional public</p>

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		<p>the supposed oil spill.</p> <p>On 06.10.2017 – publication of information under the headline "On the contamination of forests "Surgutneftegas" PJSC is liable to administrative case initiated by Department of Rosprirodnadzor for KhMAO-Yugra under Article 8.5 and Part 1, Article 8.7 of Administrative Offenses Code of the Russian Federation and Prirodnadzor of Yugra under Part 2, Article 8.31 of Administrative Offenses Code of the Russian Federation to ascertain a fact of contamination of the shoreline of the water body within the area of about 5 hectares, according to the information published by Interregional public organization "Green front".</p> <p>On 16.10.2017 – publication of information under the headline "Rosprirodnadzor for KhMAO refused to punish "Surgutneftegas" for oil contamination" stating that the Department of Rosprirodnadzor for KhMAO-Yugra dismissed the administrative case against "Surgutneftegas" PJSC under Article 8.5 of Administrative Offenses Code of the Russian Federation.</p>	<p>organization "Green front" about environmental legislation violations, and further around by other periodicals, television broadcasting company "Surgut-Info TV" issued a film clip published on the website of the TV company on 13.10.2017 under the headline "Information of "Green front" was not confirmed. The administrative case against "Surgutneftegas" is terminated". The film clip is available through the link: http://sitv.ru/arhiv/news/social/104844/.</p>
14	07.08.2017	<p>Publication of information on the website of public organization "Green front" under the headline "A variety of environmental violations discovered near Lyantor", that contained information on violations of fire safety and water bodies</p>	<p>On 29.08.2017 Prirodnadzor of Yugra inspected the area of well-pad No.325 of the Lyantorskoye oilfield as part of surveillance works.</p> <p>Following the outcome of the inspection the information on soil and water body contamination was not confirmed.</p>

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		contamination, discovered by volunteers of "Green front" near well-pad No.325 OGPD "Lyantorneft", manifested in contaminated soil and iridescent film on the surface of water bodies.	
15	26.09.2017	Publication of information on the website of public organization "Green front" under the headline "Oil contaminated water body found near Lyantor", that contained information on contamination of water body near well-pad No.330 OGPD "Lyantorneft" discovered by ecologists of "Green front".	<p>On 03.10.2017 Prirodnadzor of Yugra inspected the area of well-pad No.330 of the Lyantorskoye oilfield as part of surveillance works. The inspection was conducted in the presence of the representative of Interregional public organization "Green front" who failed to show the place of contamination.</p> <p>Following the outcome of the inspection the information on water body contamination was not confirmed.</p>
16	20.10.2017	<p>Appeal to "Surgutneftegas" PJSC made by Interregional public organization "Green front" concerning providing information on works performed on areas, mentioned in the publications on the website of Interregional public organization "Green front":</p> <p>18.07.2017 – on discovering a lake near the town of Lyantor with the shoreline covered in black oily substance that had smell and consistency of oil and the area filled with sand that showed dark spots, adjacent to the lake in the area of about 5 hectares.</p> <p>26.09.2017 – on discovery of a water body with the area of 200 square meters presumably contaminated by oil products near well-pad No.330, OGPD "Lyantorneft".</p>	<p>To the address of Interregional public organization "Green front" an answer was sent stating that the information regarding violations resulted in areas contamination allegedly committed by "Surgutneftegas" PJSC was not confirmed, administrative cases brought against "Surgutneftegas" PJSC by government authorities are terminated.</p> <p>It was proposed that Interregional public organization "Green front" in the future, when discovering facts in the territory of activity of "Surgutneftegas" PJSC suggesting possible violations of environmental legislation, would seek information in the press-service or by telephone numbers, listed on the official website of "Surgutneftegas" PJSC.</p> <p>Upon the publication of articles on the website of Interregional public organization "Green front" about environmental legislation violations, and further around by other periodicals, television broadcasting company "Surgut-Info TV" issued a film clip published on the website of the TV company on 13.10.2017 under the headline "Information of "Green front" was not confirmed. The administrative case against "Surgutneftegas" is terminated". The film clip is available through the link: http://sitv.ru/arhiv/news/social/104844/.</p>

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17	October – November 2017	Greenpeace of Russia and social activists protest against law violations during public hearings on the project of oil well drilling in Numto nature park.	<p>In order to reveal and assess the public opinion, on 05.10.2017 in the town of Beloyarsky by the Administration of Beloyarsky District, public discussions of the planned business activity, mentioned in the project "Prospecting and appraisal well No. 4717P of the Vatlorsky license block", including the EIA materials were conducted.</p> <p>Discussions are considered accomplished. There were no comments or proposals from citizens and public organizations to the addresses or phones, specified in the notices on conduction of public discussions within 30 days prior to and after public discussions.</p> <p>Blueprints of the future location of the facility are agreed upon with the residents of the Park conducting traditional nature management in the area of the future facility construction.</p> <p>Environmental authorities did not receive any claims the activity of "Surgutneftegas" PJSC from the indigenous people living in the Park.</p> <p>In accordance with Clause 4.3 of "Regulations on the assessment of the impact on the environment of the Russian Federation of future business and other activity", approved by order of State Committee for Environmental Protection No. 372 dated 16.05.2000 (hereinafter Regulations on EIA), information on the assessment of an environmental impact is published in brief in the official journals of the federal executive authority (for facilities under review of the federal level).</p> <p>In accordance with Clause 4.4 of Regulations on EIA, additional provision of information to the participants of the environmental impact assessment may be conducted by distribution of information specified in Clause 3.1.1 through radio, television, printed media, Internet and other media, providing distribution of information. This condition is not mandatory and does not violate the order of information provision and public involvement in the process of an environmental impact assessment. Absence of published specifications of the state environmental expert commission on the website of the Administration of Beloyarsky District does not violate current environmental legislation.</p> <p>Therefore, public discussions are conducted in compliance with the requirements of regulatory requirements.</p>

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for 2018			
18	20.07.2018	Appeal to the Interdistrict Environmental Prosecutor's Office of KhMAO made by Deputy chairman of KhMAO-Yugra Duma E.D.Aypin concerning oil contamination within the area of well-pad No. 83 of the Konitlorskoye field of "Surgutneftegas" PJSC, located in the traditional nature management area.	<p>In response to the appeal of E.D.Aypin, in the period from 20.07.2018 to 31.07.2018 the Interdistrict Environmental Prosecutor's Office of KhMAO inspected "Surgutneftegas" PJSC.</p> <p>Based on the inspection results the arguments specified in the appeal of E.D.Aypin are not confirmed. The violation of the environmental legislation by "Surgutneftegas" PJSC was not determined.</p>
for 2019			
19	14.02.2019	The website of Greenpeace of Russia publishes Information which calls for the defense of Numto nature park reporting the fact of non-disclosure by Surgutneftegas of public hearings on oil production in Numto. According to Greenpeace of Russia, "public hearings on the drilling of three oil wells on the wetlands of Numto nature park have again been essentially secret. Only 4 of the 200 residents of Numto village have been present at the hearings. The Russian branch of Greenpeace considers the exploration and production of oil in this	<p>On 15.02.2019 the press-service of "Surgutneftegas" PJSC prepares a refutation which has been sent to the media (appendix).</p> <p>The hearings are recognized as valid, the public and local authorities have approved the implementation of the project. The record of public discussions is published on the website of the Administration of Beloyarsky District. All legal requirements established in relation to the procedure for conducting public discussions of the planned business activity have been fully met.</p> <p>Information on the legality of the hearings is available in the national and regional media: http://www.interfax-russia.ru/Ural/news.asp?sec=1679&id=1006779 https://ura.news/news/1052372468 http://pravdaurfo.ru/news/173904-surgutneftegaz-otvetil-na-obviniya-v-</p>

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		territory illegal."	sokrytii http://www.siapress.ru/blogs/85495
20	30.05.2019	<p>Appeal of the Interregional public environmental organization "Green front" on the use of "Lenoil" biological product" by "Surgutneftegas" PJSC.</p> <p>On 03.09.2019 publishing of the article "The team of the governor of KhMAO has brought illegal technologies to the fuel and energy complex market. Prirodnadzor of Yugra has approved the use of the biological product by Surgutneftegas without state expertise review" on the website of Ural Federal District Pravda Information Agency.</p> <p>On 20.12.2019 publishing of the article "Illegal technologies in the fuel and energy complex market of KhMAO were transferred to Rosprirodnadzor. Looking for violators in Surgutneftegas".</p> <p>On 04.03.2020 there were two decisions made in respect of "Surgutneftegas" PJSC to impose administrative sanction under Part 2, Article 8.4 of Administrative Offenses Code of the Russian Federation. These decisions were made for the activity non-compliant with the documentation which has received approval from the State Environmental Expert Commission on the use of "Lenoil" biological product in land</p>	<p>"Surgutneftegas" PJSC does not use "Lenoil" biological product in its production activity.</p> <p>"Lenoil" biological product was used by "Surgutneftegas" PJSC in land plots reclamation in accordance with the projects on land reclamation which were developed in accordance with the decree of the Government of the Russian Federation No. 800 dated 10.07.2018 "On reclamation and conservation of lands". These projects were agreed by the Department of Subsoil Use and Natural Resources of KhMAO-Yugra in accordance with the procedure established by the law of Russia. After completion of reclamation, the project on reclamation were fulfilled, land plots were excluded from the Register of territories and contaminated by oil in KhMAO-Yugra.</p> <p>"Surgutneftegas" PJSC does not agree with the imposed administrative sanction, and, for that reason, on 16.03.2020 it filed an appeal to the court on the decisions for administrative violations.</p> <p>Reference: "Lenoil" biological product has a chemical product safety certificate which is included in the Register of safety certificates No. 33822935.18.00001 and is valid till 15.10.2023. This certificate forms a compulsory part of technical documentation for chemical products and is made to provide a user with true information on safety of the commercial use.</p> <p>Letter from the Division of Rospotrebnadzor in the Republic of Bashkortostan No. 02-10-11562 dated 18.08.2011 states that "Lenoil" biological product for elimination of oil contamination consequences is not included in the Unile list of goods subject to state registration. Due to that fact, it shall have compliance documents. In light of the above "Lenoil" biological product underwent certification in the result of which Rosstandart issued compliance certificates: compliance certificate ROOS</p>

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		reclamation.	<p>RU.HA34.H04574 No. 0103729 valid till 23.05.2021, environmental compliance certificate EKO.001.AYa99.P00071 No. 0000159 valid till 09.06.2022.</p> <p>Thus, compliance of "Lenoil" with all the requirements was confirmed in accordance with the procedure established by the current legislation.</p> <p>There are no regulations in the current legislation for users to carry out the mandatory State Environmental Expertise of biological products.</p>

Appendix: two pages, one copy



Refutation of “Surgutneftegas” PJSC

Due to the publishing of information by a number of mass media organizations on the fact of “non-disclosure of public hearings on oil production in Numto”, the press-service of “Surgutneftegas” PJSC informs that:

In accordance with the current environmental legislation of the Russian Federation, public discussions (hearings) on the planned business activity are held by local authorities in the territory of which the project is scheduled to be carried out. In Beloyarsky District of Khanty-Mansiysky Autonomous Okrug – Yugra hearings are held at the administrative center of the municipality – in the city of Beloyarsky. This information and information on the place and time of public discussions, place of studying the materials was published in such newspapers as “Rossiyskaya gazeta” (issue No. 282 dated 14.12.2018), “Novosti Yugry” (issue No. 142 dated 13.12.2018), “Beloyarskiye vesti” (issue No. 50 dated 14.12.2018), on the website of the administration.

Materials on the planned activity were available for studying in the administration of Beloyarsky District (the city of Beloyarsky, ul.Tsentrlnaya, 9), in the Prospecting and exploratory drilling division of “Surgutneftegas” PJSC (the city of Surgut, ul.Entuziastov, 35), on the official website of “Surgutneftegas” PJSC.

The official representatives of “Surgutneftegas” PJSC have discussed the planned activity and wells to be drilled in Numto nature park in advance with all indigenous population living in that part of the park. As a result, eight heads of kazymiski khanty and forest nenets families leading the traditional way of life in the territories of the planned works, have approved and agreed the schemes for placing the facilities.

Given the remoteness and inaccessibility of Numto national village and nomad camps located in the park, the Company arranged a helicopter round trip flight to the city of Beloyarsky for all the indigenous people willing to participate in the public discussions of the project.

On 24 January 2019, people of Numto nature park took part in hearings held by the administration of Beloyarsky District. Among them: M.S.Randymov, N.I.Vylla, P.A.Vylla, S.P.Pyak, L.I.Pyak, Zh.I.Sergacheva, L.T.Logany, including V.V.Pyak, vice-president of the Yugra Herders Community, inspector of Numto nature park.

All participants have been given several opportunities to share their opinion.

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Residents of Numto nature park voiced only single suggestion to “Surgutneftegas” PJSC: N.I.Vylla, resident of Numto village, pointed out that the works shall be performed by the best crew.

Prospecting and appraisal wells are planned to be outside the boundaries of the territory where cultural heritage sites are located, and they do not disturb sacred places of indigenous people. The nearest planned well is located in more than 12 kilometers from the cultural heritage site, Sightseeing attraction of regional significance “Numto”.

The hearings are recognized as valid, the public and local authorities have approved the implementation of the project. The record of public discussions is published on the website of the Administration of Beloyarsky District. All legal requirements established in relation to the procedure for conducting public discussions of the planned business activity have been fully met.

Thus, the press-service of “Surgutneftegas” PJSC declares that the information from some mass media organizations on alleged “non-disclosure by the Company of public hearings on oil production in Numto” does not reflect the actual situation.

15.02.2019.