

Section 11. Interested Party Consultation

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11.1 Introduction

This section describes how the Maureen Owners are carrying out consultations with interested parties on the proposed decommissioning activities for the Maureen Facilities as described in this Decommissioning Programme document.

The Maureen decommissioning consultation process covers a wider public consultation than the consultation with statutory consultees laid out in the draft DTI Guidelines

The Maureen Owners continue to take a pro-active approach to structuring the consultation process beyond the statutory consultees (these are listed in Appendix E.1). To that end a list of additional potentially interested parties has been drawn up (see Appendix E.2).

11.2 Consultation Process

Effort is being put into identifying interested parties, ascertaining their levels of interest and their desire to be a part of the process. The level of consultation is then tailored to the level of interest indicated by each of the interested parties.

It is the Maureen Owners' intention to communicate regularly with these parties, providing opportunities for dialogue and information exchange. The list of interested parties is continually being updated, and any parties not listed and wishing to participate in the stakeholder consultation or to be removed from the list, should contact Phillips Petroleum Company United Kingdom Limited (the Operator) via the dedicated Maureen web site: www.phillips66.com/Maureen e-mail address or by contacting the Public Affairs Department at telephone 01483 756666.

Table 11-1 Summary of Steps of Consultation Process

Different Process Steps	Activities
Step 1	Research and identification of interested parties in addition to those listed in the DTI Guidelines as 'statutory consultees'
Step 2	Preparation for consultation
Step 3	Letters sent to first group of interested parties followed up with telephone calls to ascertain level of interest and engagement
Step 4	Public Notices to be placed in relevant publications advising of Maureen Decommissioning and availability of Decommissioning Programme document for consultation
Step 5	Decommissioning Programme document sent to statutory and other interested consultees for comment. Document posted on Phillips' Maureen web site for access by wider audiences
Step 6	On-going dialogue through letters, telephone conversations, e-mails etc., after the DTI have approved the Decommissioning Programme.
Step 7	Refloat of the Maureen Platform (Summer 2001)
Step 8	On-going dialogue until the Maureen Platform is reused or deconstructed.

A dedicated Maureen website (www.phillips66.com/Maureen) is up and running, giving information on Maureen Facilities and the decommissioning process. A copy of this document is also posted on the web site for viewing or downloading by interested parties. In addition, hard copies of the document are available for consultation at the Phillips Petroleum Company United Kingdom Limited offices in Woking and Aberdeen (appointments to consult the document should be made by calling the Public Affairs Department at telephone 01483 756666).

As each step of the decommissioning process is carried out, information will be posted up on the site. The option of communicating by e-mail directly with company representatives through the web site is already established.

11.2.1 Where to Send Your Comments

Send your comments to the Web Site or to:

Public Affairs
Maureen Project
Phillips Petroleum Company United Kingdom Limited
Phillips Quadrant
35 Guildford Road
WOKING
Surrey GU22 7QT

11.3 Consultation Activities and Responses

Active interested party consultation has taken place in accordance with the DTI Guidance Notes and the commitment made by the Maureen Owners for involving as wide a range as possible of interested parties.

Since August 1999, the Maureen Owners have been keeping over two hundred and fifty interested parties informed of the progress of the Maureen facilities decommissioning. These parties are listed in Appendix E of this document. Contact has ranged from the provision of information through to dialogue with those consultees with a more active interest.

Prior to the publication of the Second Draft Maureen Decommissioning Programme document at the end of May 2000, a public awareness advertisement, as well as the required public notice, was run in key national publications. See subsection 11.3.1 for copies of the advertisements and lists of publications.

Statutory consultees were each provided with a copy of the Decommissioning Programme for comment during the thirty-day statutory consultation period – 1st to 30th June 2000. See subsection 11.3.2 for copies of letters and facsimiles received from statutory consultees, together with response letters from Phillips Petroleum Company United Kingdom Ltd on behalf of the Maureen Owners.

In addition to the statutory consultees, other interested parties were advised of the publication of the document and invited to send any comments they might have to the Maureen Owners. See subsection 11.3.3 for copies of letters and facsimiles received from other interested parties.

The Decommissioning Programme was also posted on the Phillips Petroleum Company web site. Over ten thousand "hits" have been recorded on the Decommissioning Programme pages since 31st May 2000. Since publication of the document, over seventy enquiries have been received either via the dedicated Maureen phone number or via the dedicated e-mail address. Some fifty CD ROM copies of the document were sent to those requesting them.

Hard copies of the Maureen Decommissioning Programme document were available for consultation at the Phillips Petroleum Company United Kingdom Ltd offices in Aberdeen and Woking. Copies were also placed in the public libraries in Aberdeen, Woking and Westminster.

No objections to the Maureen Owners' proposed plans were put forward by any of the statutory consultees and to date no objections have been received from any of the other interested parties.

Active consultation will continue with all Interested Parties as the decommissioning of the Maureen Facilities progresses.

11.3.1 Awareness Advertisement and Public Notice

The public awareness advertisement shown in Figure 11-1, was inserted in the following publications:

The Economist	Fri 19th May 2000
Energy Day	Mon 22nd May 2000
Fishing News	Fri 19th May 2000
New Scientist	Fri 19th May 2000
Upstream	Fri 19th May 2000
The Guardian	Wed 17th May 2000
The Scotsman	Thurs 18th May 2000
The Herald	Thurs 18th May 2000
Aberdeen Press & Journal	Wed 17th May 2000
The Daily Telegraph	Tues 16th May 2000
The Times	Tues 16th May 2000

Figure 11-1 Public Awareness Advertisement

ANNOUNCEMENT

PUBLIC

Maureen facilities decommissioning

The owners of the Maureen oil production platform are preparing for the decommissioning of the structure and other facilities in the Maureen field. A draft of the document describing the decommissioning process and the preferred final option (The Decommissioning Programme) is being sent to statutory consultees as well as other key stakeholders. Their views will be taken into account in the final version of the document which will be submitted to the UK's Department of Trade & Industry for approval of the recommended decommissioning solution.

The Maureen platform is a large steel gravity-based structure located in the Northern North Sea, on the UK Continental Shelf. It is unlike any other large steel North Sea structure in that it was designed to be refloated and re-used at another location.

If you would like to be included in the consultation process or would like further information, please contact:
Jim Rae or Lynnda Robson at Phillips Petroleum
Tel: +44 (0) 1483 752000, or email: maureen@ppco.com or you can visit our web site www.phillips66.com/maureen where a copy of the document can be downloaded, when it is available for consultation.

The Maureen owners:



The public notice, as shown in Figure 11-2, appeared in the following publications:

The Guardian	Wed 24th May 2000
The Scotsman	Thurs 25th May 2000
The Herald	Thurs 25th May 2000
Aberdeen Press & Journal	Wed 24th May 2000
The Daily Telegraph	Tues 23rd May 2000
The Times	Tues 23rd May 2000
Edinburgh Gazette	Tues 23rd May 2000

Figure 11-2 Public Notice

PUBLIC NOTICE

The Petroleum Act 1998

Maureen/Moira Field Decommissioning

The Maureen Owners, Phillips Petroleum Company United Kingdom Limited (Operator), Agip (U.K.) Limited, BG International Limited, Fina Exploration Limited and Pentex Oil UK Limited will submit, for the consideration of the Secretary of State for Trade and Industry, a Decommissioning Programme for the Maureen and Moira Fields in accordance with the provisions of the Petroleum Act 1998. Consultations on the Programme are now being made pursuant to the provisions of the Act.

The items/facilities covered by the Decommissioning Programme are the Maureen platform; drilling template; loading column and oil loading pipeline; and the Moira subsea facilities including pipelines and umbilical.

The Maureen Owners hereby give notice that a summary of the Maureen Decommissioning Programme can be viewed at the internet address : www.phillips66.com/maureen

Alternatively a CD-Rom disk is available from the address detailed below, or hard copy of the Programme can be inspected at the following locations during office hours:

Aberdeen Central Library, Business & Technical Department, Rosemount Viaduct, Aberdeen AB25 1GW

Westminster Reference Library, 35 St. Martin's Street, London WC2H 7HP

Woking Library, Gloucester Walk, Woking, Surrey GU21 1EP

Phillips Petroleum Company United Kingdom Ltd, 35 Guildford Road, Woking, Surrey GU22 7QT


Phillips Petroleum Company United Kingdom Ltd, Regent Centre, Regent Road, Aberdeen AB11 5NS

Representations regarding the Maureen Decommissioning Programme should be submitted in writing to Mr Geoff Tilling, Decommissioning Manager at Phillips Petroleum Company United Kingdom Limited, Phillips Quadrant, 35 Guildford Road, Woking, Surrey GU22 7QT or by email to: maureen@ppco.com, to be received by closing date 30th June 2000 and should state the grounds upon which any representations are being made.

Mr Geoff Tilling, Decommissioning Manager,
Phillips Petroleum Company United Kingdom Limited, Phillips Quadrant, 35 Guildford Road, Woking, Surrey GU22 7QT

11.3.2 Statutory Consultations and Responses

Figure 11-3 Letter Sent to All Statutory Consultees

	PHILLIPS PETROLEUM COMPANY UNITED KINGDOM LIMITED PHILLIPS QUADRANT, 35 GUILDFORD ROAD, WOKING, SURREY, GU22 7QT TELEX No. 859763 FACSIMILE No. 01483 752309 TELEPHONE: SWITCHBOARD 01483 756666 or DIRECT DIAL 01483 — VAT REGISTRATION No. GB 239 0635 60
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26 May 2000

«Contact»
«Title»
«Organisation»
«Add1»
«Add2»
«Add3»
«PostCode»

Dear «Salutation»

**RE: MAUREEN DECOMMISSIONING PROGRAMME – STATUTORY
CONSULTATION PERIOD**

Further to my letter of May 17, I am pleased to enclose a copy of the Decommissioning Programme document for the Maureen facilities on behalf of all the Maureen owners.

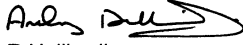
As you will know, under the requirements of section 29 (3) of the Petroleum Act 1998 and in accordance with the DTI's draft Decommissioning Guidance Notes, statutory consultees have 30 days in which to provide comments on the Decommissioning Programme document to us. The official period for consultation will begin Thursday, 1 June and end on Friday, 30 June. We are sending you the document a few days in advance to ensure you have ample time.

As you will see, the Decommissioning Programme proposes that nearly all the Maureen facilities be removed from the seabed. The only exception is a large diameter oil loading pipeline, where environmental, safety and economic considerations make leaving it in place, cleaned and buried, the preferred option. The Decommissioning Programme is fully consistent with and requires no derogation from the requirements of OSPAR Decision 98/3.

Please send your comments to me at the address above. If you have any queries or concerns in the meantime, please do not hesitate to contact me.

We look forward to hearing from you at the end of June.

Yours sincerely


A R Halliwell
Capital Projects Manager
Phillips Petroleum UK Ltd
E-mail: maureen@ppco.com
Tel: 01483-756 666

Enc.

Figure 11-4 Letter from Statutory Consultee – JNCC and Scottish Natural Heritage



Joint Nature Conservation Committee
Dunnet House, 7 Thistle Place
Aberdeen AB10 1UZ, United Kingdom

Telephone: 01224 655716
Email: *Sumner* @jncc.gov.uk
Fax: 01224 621488

A R Halliwell
Capital Projects Manager
Phillips Petroleum UK Limited
Phillips Quadrant
35 Guildford Rd, Woking,
Surrey GU22 7QT

26 June 2000

Dear Mr Halliwell

Decommissioning Phillips Maureen Field Development. Block 16/29.

Thank you for sending us the above plan for comment. This is a joint response on behalf of the Joint Nature Conservation Committee and Scottish Natural Heritage.

We have now read the plan and consider that it gives a good description of the facilities, the environment in the vicinity of the facilities and the decommissioning strategy. On the basis of the information provided we do not have any major objections at this stage but do have a number of points that we would request Phillips to respond to.

1. Cuttings piles. We agree with Phillips assessment that there is no technology currently available to remove the cuttings pile and that at present it is best left in situ. However, we are very concerned about the potential for resuspension of hydrocarbons and heavy metals from the pile as a result of commercial fishing activity. Despite some degradation of the pile the document acknowledges that other areas show little sign of recovery to date and we are aware, for example that some pile cores revealed undegraded diesel base oil. In the light of this information we would be reluctant to condone the use of the area by trawlers if it may lead to the resuspension and spread of cuttings pile contamination with subsequent impacts on the benthic community. In our opinion ongoing research, technological developments and results of post-decommissioning monitoring should inform future decisions on the long-term future of the pile. In the meantime we would advise that the pile be left in as undisturbed a condition as removal allows. Following platform refloating the situation should be reassessed in the light of developments at that time and we would ask that Phillips consult us then.

As an aside we would also advise that any cuttings adhering to the platform be removed prior to removal of the platform in order to limit the contaminated area to the existing pile as far as possible.

2. Potential impacts of Maureen platform and loading column on inshore marine sites. It is possible that the platform and loading column may be towed to an inland site such as a sea loch for mooring, refitting or disassembly. We consider that such a move could have a significant environmental impact on the nature conservation value of such an area. In view of the current uncertainties about the ultimate fate of the platform and mooring column we would request that SNH be consulted at the earliest available opportunity if Phillips intend to pursue this option in order to agree the best way forward.

The Joint Nature Conservation Committee is the body constituted by the Environmental Protection Act 1990 to be responsible for research and advice on nature conservation at both UK and international levels. It is a committee of the Countryside Council for Wales, English Nature and Scottish Natural Heritage, together with independent members and with representatives from the Countryside Commission and Northern Ireland. It is supported by specialist staff.

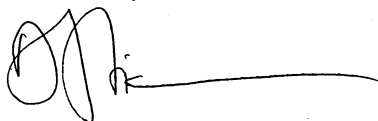


Figure 11-4 Letter from Statutory Consultee – JNCC and Scottish Natural Heritage (Continued)

3. Potential impacts from transportation of Maureen platform. We would like to see an assessment of the potential impacts from the transportation of the Maureen platform. What are the possible impacts from an accidental event and what measures are being taken to prevent them occurring?
4. Use of explosives. We note that the two docking piles and four mooring piles will be removed using small explosive charges. There are potential impacts on Cetaceans as a result of using explosives, although we would stress that this is not a very sensitive area for these animals. Nonetheless, we would enquire as to the feasibility of using cutting techniques, as for the foundation piles rather than explosives. If this were not technically feasible we would ask that Phillips contact us to agree a procedure designed to minimise potential impacts.

We have also considered the implications of the recent judgement that the Habitats Directive (92/43/EEC) should apply to the whole United Kingdom continental shelf. It will take a short time to carry out the actions necessary to bring implementation of the Directive into line with that already undertaken on land and in terrestrial waters. In the meantime, we have acted in a precautionary way and used our best judgement as to whether there are any habitats or concentrations of species that could be considered in future as candidate Special Areas of Conservation (SACs) present in the area that is likely to be affected by the proposed activity. We are unaware of any such habitats or concentrations of species and therefore consider that the above- proposed activity will not affect any possible future SAC.

Yours sincerely



David Simmons
Offshore Industries Advisor

cc John Baxter, Scottish Natural Heritage
Graeme White, Department of Trade and Industry

Figure 11-5 Response to JNCC and Scottish Natural Heritage Letter



PHILLIPS PETROLEUM COMPANY UNITED KINGDOM LIMITED

PHILLIPS QUADRANT, 35 GUILDFORD ROAD, WOKING, SURREY, GU22 7QT
TELEX No. 859763 FACSIMILE No. 01483 752309
TELEPHONE: SWITCHBOARD 01483 756666 or DIRECT DIAL 01483 —
VAT REGISTRATION No. GB 239 0635 60

5th July 2000

David Simmons
Offshore Industries Advisor
Joint Nature Conservation Committee
Dunnet House
7 Thistle Place
Aberdeen
AB10 1UZ

Dear Mr Simmons,

RE: DECOMMISSIONING MAUREEN FIELD DEVELOPMENT,
BLOCK 16/29

Further to your letter of June 26th, we would like to thank you for your detailed response to the draft Maureen Decommissioning Programme document. We note that the response is jointly from yourselves and Scottish Natural Heritage.

In your response as a statutory consultee, you requested that we respond to four key points, namely: 1) the presence of drill cuttings, 2) the potential impacts of the platform and loading column on inshore marine sites, 3) the potential impacts of transportation of the platform and 4) the use of explosives for the two docking piles and four mooring piles. We have responded to each point, in turn, below.

1) Drill Cuttings

We are encouraged that you share our views that there are, at present, no proven means of removing drill cuttings from the seabed in an environmentally acceptable manner and that, therefore, leaving the cuttings in place is, currently, the best solution. We have undertaken to carry out strict post-decommissioning monitoring of the remains at the site. In addition, as stated in the Decommissioning Programme, we will review the situation, as more data and study results become available.

You also advised us of your preference that any cuttings adhering to the platform be removed in order to avoid spreading any potential contamination. Our diver and video evidence shows that cuttings material does not adhere to the platform steel. In addition the flat tops to the platform bases are about 7.5m above seabed level, whereas the cuttings layer averages 0.6m. There is a negligible amount of material of any kind settled on those surfaces. We do not anticipate any disturbance/solid resuspension beyond the actual refloat operation.

As stated in the Decommissioning Programme, it is expected that the upward movement of the structure during refloat operations will cause disturbance to the drill

**Figure 11-5 Response to JNCC and Scottish Natural Heritage Letter
(Continued)**

cuttings beneath the Platform. The effect has been simulated by BMT Marine Information Systems Limited and the conclusion of this prediction indicates that the drill cuttings will not be redistributed beyond the existing cuttings layer (Section 7.4.4).

2) Potential Impact of the platform and loading column on inshore marine sites

A decision will be made, in the next month or so, which will clarify which inshore location will be chosen for the mooring of the Platform and Loading Column. Once the location has been confirmed, we will contact you to clarify any concerns you have on the environmental impact of the inshore decommissioning activities.

3) The potential impacts of transportation of the platform

You advised us that you would like to see an assessment of the potential impacts from the transportation of the platform. We will be happy to take you through our plans to ensure that you are satisfied with our proposals as soon as possible. This will depend upon the announcement in 2 (above), as the tow route will then be fixed.

4) The use of explosives for the two docking piles and four mooring piles

We apologise that our text in Section 7.7.2 did not make it clear that the piles in question are concrete filled. This precludes the use of abrasive water jet cutting techniques. The weight of the piles, above the cut point, is such that deploying diamond wire tools and operatives in the excavation is considered an unsafe activity. As this has led to the selection of explosives for cutting we will contact you separately in the near future to advise you of our proposals.

Finally, we note that you have considered whether or not the decommissioning activities might impact any habitats or concentrations of species in Special Areas of Conservation (SAC) under the Habitats and Species Directive (92/42/EEC) and that you have concluded that the proposed activity will not affect possible future SACs.

We hope that the above information has answered your concerns to date. We will, of course, keep you informed of our progress. In the meantime, if you have any further concerns or queries, please do not hesitate to contact me.

Yours sincerely,



A R Halliwell
Capital Projects Manager
Phillips Petroleum Company UK Ltd
E-mail: maureen@ppco.com
Tel: 01483 756666

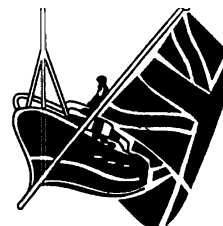
cc: Mr J Baxter, Scottish Natural Heritage

Figure 11-6 Letter from Statutory Consultee – NFFO

National Federation of Fishermen's Organisations

Chief Executive: Barrie Deas

N.F.F.O. Offices,
Marsden Road,
Fish Docks,
Grimsby DN31 3SG
Tel: 01472 352141
Fax: 01472 242486
email: nffo@nffo.org.uk
website: www.nffo.org.uk



President: Mr M Townsend
Chairman: Mr R Casson

21 June 2000

Mr. A.R. Haliwell
Phillips Petroleum
Phillips Quadrant
35 Guildford Road
Woking

Dear Mr Haliwell

Maureen Decommissioning Programme.

Thank you for the letter and consultation document dated 26 May. After consultation with various sectors of the fishing industry south of the border the following comments are submitted.

There have been no specific issues raised by groups south of the border. The fact that the aim of Phillips Petroleum is to ensure that post decommissioning, the area is clear and unimpeded for future fishing activities is both welcomed and fully supported.

However, while we have fishing vessels within NFFO membership who regularly operate in the vicinity of Maureen we accept that our representation is very much in the minority. On that basis you will perhaps need to consider more seriously the views of the Scottish Fishermen's Federation.

We thank you for the opportunity to comment and would welcome further communication on the matter should the need arise.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Dave Bevan', is written over a horizontal line.

Dave Bevan
Chief Fisheries Liaison Officer

Figure 11-7 Response to NFFO Letter



PHILLIPS PETROLEUM COMPANY UNITED KINGDOM LIMITED

PHILLIPS QUADRANT, 35 GUILDFORD ROAD, WOKING, SURREY, GU22 7QT
TELEX No. 859763 FACSIMILE No. 01483 752309
TELEPHONE: SWITCHBOARD 01483 756666 or DIRECT DIAL 01483 —
VAT REGISTRATION No. GB 239 0635 60

6th July 2000

Mr D Bevan
National Federation of Fishermen's Organisations
Marsden Road
Fish Docks
Grimsby
DN31 3SG

Dear Mr Bevan,

RE: MAUREEN DECOMMISSIONING PROGRAMME

Thank you very much for your response to the statutory consultation around the Maureen Decommissioning Programme. We note that none of your members have any specific comments with regard to our proposals.

We fully appreciate that our activities will be of greater interest to the Scottish Fishermen's Federation and we are working closely with them. We will also ensure that we keep you fully informed of our progress.

In the meantime, if you should have any concerns or queries, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Andy Halliwell'.

A R Halliwell
Capital Projects Manager
Phillips Petroleum Company UK Ltd
E-mail: maureen@ppco.com
Tel: 01483 756666

cc: A.Lloyd, PPCo Ltd, Aberdeen

Figure 11-8 Letter from Statutory Consultee – SFF



SCOTTISH FISHERMEN'S FEDERATION

14 Regent Quay, Aberdeen AB11 5AE
Telephone (01224) 582583 Fax (01224) 574958
E-Mail: SFF@sff.co.uk

Your Ref:

Our Ref: **MJS/AH/P10.20**

30th June 2000

Mr A R Halliwell
Capital Projects Manager
Phillips Petroleum UK Ltd
Phillips Quadrant
35 Guildford Road
Woking
Surrey
GU22 7QT

Dear Mr Halliwell

THE PETROLEUM ACT 1998 **MAUREEN DECOMMISSIONING PROGRAMME –** **STATUTORY CONSULTATION PERIOD**

We refer to the above referenced Draft Decommissioning Programme and which Programme has recently been submitted by yourselves to the Secretary of State for Trade and Industry, for approval, or otherwise.

Following consultation with this Federation's Member Associations, we are pleased to confirm that the Scottish Fishermen's Federation has no adverse comments to raise in connection with Phillips Petroleum Co UK Ltd Maureen/Moira Decommissioning proposals; either in a general or specific sense. With regard to Environmental Impact Issues and related matters we are content to leave these to the experts at SERAD and their Marine Laboratory Officials to comment on the same. We do note that Drill Cuttings, appear not to be a significant issue on this occasion; however, we shall leave the detail to the Marine Laboratory to pursue. We shall also leave comments on matters such as water disposal to the Marine Laboratory.

Having stated the above, we do recall that during the Consultation Dialogue between the SFF, its relevant Associations and Phillips Petroleum UK Ltd which took place during the mid 1970's (and later for Moira) all in respect of as mentioned the Installation/Development Proposals for your Maureen/Moira Assets, we placed firmly on record with yourselves and indeed the various relevant Government Departments, that our preference was for timely removal of all relevant Maureen/Moira hardware from the seabed upon Field Exhaustion; with the clear objective being that of achieving a seabed safely returned to the pre installation Status Quo. Your Decommissioning Document and Proposed Programme clearly cater for this outlook, including notably the Platform, Template, and associated pipelines. We note however that the preferred proposal is for the Oil Offloading Pipeline, to remain insitu within its existing backfilled trench. In view of

maureendecommprog01

V.A.T. Reg. No. 605 0967 48

Members: Clyde Fishermen's Association : Eyemouth & District Fishermen's Association : Fishsalesmen's Association (Scotland) Limited : Mallaig & North-West Fishermen's Association : Orkney Fisheries Association : Scottish Pelagic Fishermen's Association Limited : The Scottish White Fish Producers' Association Limited : Shetland Fishermen's Association

Figure 11-8 Letter from Statutory Consultee – SFF (Continued)

– 2 –

the buried nature of this particular pipeline, we are not opposed to this option; nevertheless it is imperative that this pipe remains demonstratively stable within the trench over both the short run and the long term. We also appreciate that you have been working closely with the Marine Laboratory Officials etc. on this particular matter.

We are especially pleased to learn that the Maureen Platform is to be deballasted and floated away for possible reuse. We recognise the refloat is a complex technical operation but trust that all parties will endeavour to ensure that it is a successful operation. In this respect Phillips have also previously explained to us their requirement for utilising Soil Surcharge to assist in the deballasting operations and having commented on this matter at an earlier stage, we do not have any additional comments to offer.

To summarise then, this Federation is content to note that, in essence all Maureen/Moira Platform, Tanker Offloading and Offshore Subsea facilities are to be removed from the seabed, (save the large diameter oil loading pipeline which is/has been demonstrated as being buried) and that thereafter follow on work will ensure that the seabed in the area is free of any unforeseen residual obstructions.

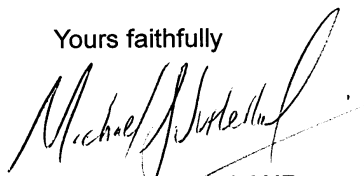
Phillips Petroleum Co Ltd's proposals are therefore, in the view of this Federation, Environmentally Positive, Fishing Aware and Safety Conscious; ultimately the proposals will ensure that the seabed is returned to Status Quo and that therefore ultimately, all Fishermen (of whatever Nationality) can once again fish safely and freely in this locality for generations to come.

Finally, we thank you and your team for the open and fair manner in which you have conducted and indeed continue to conduct discussions with ourselves on the matter.

We also take the opportunity to mention that we have found the Decommissioning Proposal Document prepared by Phillips Petroleum Co UK Ltd and particulars to be thorough in content balanced in outlook, well laid out and generally a very user friendly piece of work.

Good luck with your endeavours.

Yours faithfully



MICHAEL J SUTHERLAND
General Manager

Figure 11-9 Response to SFF Letter



PHILLIPS PETROLEUM COMPANY UNITED KINGDOM LIMITED

PHILLIPS QUADRANT, 35 GUILDFORD ROAD, WOKING, SURREY, GU22 7QT
TELEX No. 859763 FACSIMILE No. 01483 752309
TELEPHONE: SWITCHBOARD 01483 756666 or DIRECT DIAL 01483 –
VAT REGISTRATION No. GB 239 0635 60

5th July 2000

Mr M J Sutherland
General Manager
Scottish Fishermen's Federation
14 Regent Quay
Aberdeen
AB11 5AE

Dear Mr Sutherland,

**RE: MAUREEN DECOMMISSIONING PROGRAMME STATUTORY
CONSULTATION PERIOD**

Thank you very much for your detailed and cordial response to the Maureen Decommissioning Programme.

We note that you are, in general, comfortable with the proposed decommissioning activities.

We will, of course, continue to be in close contact with you throughout the process to ensure that you are kept abreast of progress.

In respect of the drill cuttings, as you know the Maureen Owners are committed to the UKOOA JIP and will be guided by its findings. The Maureen Owners will carry out their responsibilities in this matter as agreed with the DTI and Marine Laboratories. We note your concerns with regard to the proposal to leave the buried Oil Loading Pipeline in place. As stated in the Decommissioning Programme, an inspection regime will be agreed with the DTI and implemented. We will ensure that you are kept informed of the details of this.

In the meantime, if you have any further queries or concerns, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Andy Halliwell'.

A R Halliwell
Capital Projects Manager
Phillips Petroleum Company UK Ltd
E-mail: maureen@ppco.com
Tel: 01483 756666

cc: A.Lloyd, PPCo Ltd, Aberdeen

Figure 11-10 Facsimile from Statutory Consultee – BT



Facsimile cover sheet

To	A R Halliwell	From	Stephen Jackman
Company	Phillips Petroleum	Business Unit	Subsea Cable Systems
Date	03 July, 2000	Address	BT Worldwide 18-20 Millbrook Road East Southampton
Telephone	01483 756666		SO15 1HY
Facsimile	01483 752607	Telephone	+44 23 8083 7930
Number of pages including cover sheet	1	Facsimile	+44 23 8022 9981

Subject: Maureen Decommissioning Programme

Thank you for providing information on the decommissioning programme to BT.

BT Worldwide/Concert have no in-service subsea telecommunications cables in the immediate vicinity of the Maureen platform and, hence, have no comments to make on your proposals.

However, we will be concerned about the finally decided tow route of the structure, in particular, where in-service telecommunications cables may be crossed. Please maintain liaison with this office on this subject.

Regards,

A handwritten signature in black ink, appearing to read 'S. Jackman', written over a horizontal line.

Stephen Jackman
Consents and Offshore Liaison Manager

Figure 11-11 Response to BT Facsimile



PHILLIPS PETROLEUM COMPANY UNITED KINGDOM LIMITED

PHILLIPS QUADRANT, 35 GUILDFORD ROAD, WOKING, SURREY, GU22 7QT
TELEX No. 859763 FACSIMILE No. 01483 752309
TELEPHONE: SWITCHBOARD 01483 756666 or DIRECT DIAL 01483 –
VAT REGISTRATION No. GB 239 0635 60

6th July 2000

Mr S Jackman
Manager Marine Route Engineering
BT Global Networks
18-20 Millbroke Road East
Southampton
SO15 1HY

Dear Mr Jackman,

RE: MAUREEN DECOMMISSIONING PROGRAMME

We would like to thank you for taking the time to read through the Decommissioning Programme document. We note that you have no comments to make on the contents other than to request details of the tow route.

We will, of course, keep you informed of the progress of the decommissioning process and will ensure that we provide you with the exact tow routes for the Maureen platform and Loading Column following refloat in due course. We are likely to have more precise information regarding tow routes in the next month or so, once the mooring location has been confirmed.

In the meantime, if you should have any concerns or queries, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A R Halliwell'.

A R Halliwell
Capital Projects Manager
Phillips Petroleum Company UK Ltd
E-mail: maureen@ppco.com
Tel: 01483 756666

Figure 11-12 Response from FAL

As a Statutory Consultee FAL (Fishermen's Association Limited) had been invited to participate in the Statutory Consultation process but no response has been received.

11.3.3 Other Responses Received from Interested Parties

Figure 11-13 Response from Wilkinson Environmental Consulting Ltd

**Comments on Maureen Decommissioning Programme
Issue 3 May 2000
by Pete Wilkinson
Wilkinson Environmental Consulting Ltd
Blyth House
Bridge Street
Halesworth Suffolk IP19 8AB**

The comments given in this brief paper are those of the author alone and are not meant to represent those of any other organisation or individual. They are offered without prejudice and are intended to be taken as positive criticism in the interests of achieving the best practicable environmental option for the disposal of redundant oil and gas installations. They have been compiled after a necessarily cursory study of the document as the author was not financially contracted to carry out the analysis.

General comment

This is an impressive and well laid-out document. However, its status is unclear. If it is a document produced in compliance with various statutory obligations for presentation to relevant government departments, then a 'plan of action' - which is what this document is, essentially - is perfectly adequate although it falls into the 'decide, announce, defend' category. If, however, it is a consultation document, then consultees should have more than one option to consider and to evaluate. Single options only are presented for all facilities except the drilling template, pipelines and umbilicals and the oil loading pipeline.

Furthermore, when options are considered, the relative environmental merits of each are only dealt with perfunctorily and do not take an holistic view of those impacts, viz, what happens in terms of energy impact if the platform cannot be re-used either in its entirety or partially? Likewise, CO₂, oxides of sulphur and nitrogen are not quantified in assessing air contamination and energy impacts are only looked at in terms of vessel operating days.

The social impacts of selected or multi-options are not addressed. Noise, disturbance, transport impact, employment - none of these issues are dealt with in a comprehensive manner in the document: perhaps they are not required to be dealt with so, but if this is designed to be a consultation document then the raw data upon which consultees are asked to draw conclusions is lacking, in my opinion.

**Figure 11-13 Response from Wilkinson Environmental Consulting Ltd
(Continued)**

By embracing the social aspects on various disposal options, the company would have been able to address the issue of alternative spend for achieve more impressive environmental improvement characteristics.

It is disappointing to find that the document makes no criticism of Ospar 98/3 but rather acknowledges the need to spend huge sums of money to demonstrate that in order to remove an unquantified environmental threat, the selected courses of action detailed in the report will be taken regardless of what comparative environmental impact profiles might be.

1. The preamble does not explain what the document is, why it has been produced and what its purpose is.

2. If the purpose is for consultation (i.e. an evaluation by a group of consultees as to the BPEO), then the 'Selected Decommissioning Options' identified at table 2.1 are possibly premature. This is a 'decide, announce, defend' outcome and, while the options selected conform with mainstream green policy and indeed that of Ospar, the document does not present comparative scenarios from which BPEOs can be identified.

3. According to 2.7, the only option considered for the loading column and the platform was removal and reuse/recycling. The options considered for the drilling template all required removal and recycling. This assumes:

- * removal will deal effectively with some undefined environmental threat
 - * there will be a partial or total reuse opportunities available
 - * other options for disposal are not viable
- * derogation options for appropriate structures under Ospar 98/3 were not deemed appropriate
 - * these options deliver the best environmental impact profile

While there is a clear and obvious imperative in attempting to find a re-use option for the platform and loading column since they were designed for re-use, I can find no clear evidence in the document to support any of the above assumptions.

4. At 2.7.3, on page 10, the report states that disturbance of the drill cuttings during removal operations will be minimised. Some quantification of this minimisation and the impact such disturbance might have on the marine environment should be factored in to the selected removal option to establish BPEO.

**Figure 11-13 Response from Wilkinson Environmental Consulting Ltd
(Continued)**

5. The wellhead facilities are not subject to any other option quantification beyond removal for recycling thereby denying any comparative environmental impact assessment.

6. The fact that drill cuttings management decision will be subject to the UKOOA JIP initiative and to the outcome of further research is a positive statement which will be received positively by many consultees. However, without wishing to pre-judge the findings of the JIP, there is already a general agreement that the cuttings piles should be presumed 'guilty' and therefore in need of removal based on the principle that toxicity can be received by organisms through a known pathway. It is imperative that comprehensive and transparent EIAs are carried out on the drill cuttings in order to arrive at a BPEO. As part of this process, the industry generally and companies involved in cessation programmes in the North Sea in particular must evaluate relative benefits of spending such sums as are required to remove facilities and cuttings piles against:

- * agreed and quantified impact profiles for cuttings
- * overall environmental impact assessments of various management scenarios
- * value (i.e. return on the dollar) of the spend in terms of environmental improvement
- * comparison of this benefit against benefit potentially derived through alternative spend - i.e. achieving the overall objective of improving marine quality in a more direct and effective way.

7. 6.2 (Selection criteria) and 6.3 (Option selection) demonstrates that the long-list for overall decommissioning options for platform management (and for other materials with the exception of the drilling template and pipelines) were reduced to the only short-listed option of removal and re-use by evaluation of selection criteria and with due regard to Ospar 98/3. However, the process by which this evaluation took place, the forum in which this evaluation took place, by whom it was conducted and the data upon which the evaluation was based are not spelled out. Furthermore, it would appear from 4.2.1 that the substructure of Maureen qualifies for derogation under Ospar 98/3 yet none is sought.

8. Only where one or more options survived the long-list examination do we see analysis of any criteria by which the decision was made. This works very well for the oil loading pipeline option. The ranking process used is easy to follow and concise. However, in terms of evaluating the environmental considerations, the calculations appear to be 'ball park' rather than quantified in terms of tonnes CO2 etc.

**Figure 11-13 Response from Wilkinson Environmental Consulting Ltd
(Continued)**

9. Section 7 gives us an overview of the selected decommissioning option for the platform and drilling template. It is impressively descriptive, but not comparative.

10. The description of the removal of the platform and drilling template removal assumes the former goes to a deep anchorage and that the latter is transported ashore for disposal. In order to make an evaluation of the final disposal costs (environmental, social, financial) it is necessary to take various option scenarios to their logical conclusion - i.e. comparing the impacts across a range of fates from dumping at sea to the need to eventually bring the platform ashore and cut it up in the event of no re-use options being available. Neither extreme option is examined fully in the report thereby making a comparative assessment difficult.

11. There is ambiguity in statements made at the top of page 47 at 7.10.5.3 (impact on ecosystems [of leaving drill cuttings in place] = 'no impact) and the concerns expressed on page 49 (the option to leave cuttings in place...has been assessed to result on an impact on fisheries).

12. Generally, there seems to be a great deal of space given to assessing options to deal with cuttings piles when it has already been stated that the ultimate decision will be subject to on-going research and the outcome of the JIS initiative. These sections simply encourage speculation.

13. Criticism of section 8 (Overview of selected decommissioning option of the loading column) is similar to that of other sections where impressively descriptive copy and diagrams replace any comparative analysis.

14. I sincerely hope that these brief comments are valuable to the company and I apologise if any offence is taken at the direct tone used: none was meant or implied.

PJW 1/8/00

Figure 11-14 Letter to Wilkinson Environmental Consulting Ltd



PHILLIPS PETROLEUM COMPANY UNITED KINGDOM LIMITED

PHILLIPS QUADRANT, 35 GUILDFORD ROAD, WOKING, SURREY, GU22 7QT
TELEX No. 859763 FACSIMILE No. 01483 752309
TELEPHONE: SWITCHBOARD 01483 756666 or DIRECT DIAL 01483 —
VAT REGISTRATION No. GB 239 0635 60

20 September 2000

Mr P Wilkinson
Wilkinson Environmental Consulting Ltd
Blyth House
Bridge Street
Halesworth
Suffolk IP19 8AB

Dear Mr Wilkinson

RE: Maureen Decommissioning

Thank you very much for your comments on the Maureen Facilities Decommissioning Programme. We appreciate the time you have taken to read through the lengthy document. In your paper, dated 1st August, you raised a number of issues which I have endeavoured to answer below under three main headings that seemed to summarise your main points:

1. The Decommissioning Programme – *responding to general presentational, document contents and option selection comments*
2. Regulatory requirements – *responding to general national and international legislative requirements*
3. Specific queries – *responding to queries requiring specific answers*

As you know, the Maureen platform and Loading Column are not representative in any way of the other North Sea facilities. The fact that the platform and loading column were designed for total removal, means that many of the disposal options which would normally have been evaluated for fixed steel structures, for example, were not relevant to the Maureen facilities.

With this in mind, I hope that the following points will provide some insight into the Maureen owners' proposals and thinking.

1. The Decommissioning Programme

The Maureen Decommissioning Programme document has been produced in accordance with the draft DTI Guidance Notes for Industry on the Decommissioning of Offshore Installations and Pipelines, which have recently been published in final form. As you will be aware, the Notes, which although not prescriptive, provide operators with clear guidance on the format and content of Decommissioning Programmes which are to be submitted to HM's Government for approval (see Section 6 + Annex A & E). The Maureen Owners have endeavoured to follow the Guidance Notes as faithfully as possible, taking into account the unusual features of the Maureen facilities. In addition, the finalised version of the Guidelines does not require any changes to the Maureen Decommissioning Programme. The decommissioning proposals follow the waste hierarchy (reduce, reuse, recycle, dispose).

**Figure 11-14 Letter to Wilkinson Environmental Consulting Ltd
(Continued)**

- 2 -

No decision has yet been taken regarding the final fate of the Maureen platform and the three main options (reuse as an oil production facility, partial reuse and deconstruction if the two former options are not viable) remain on the table until all views and avenues have been explored. Interested parties will continue to be consulted during the process of making the final decision on the fate the structure. The Decommissioning Programme currently remains in draft format until the Government calls for a final version for approval.

2. Regulatory requirements

As responsible operators, the Maureen owners have complied with the requirements of the Petroleum Act 1998. Under Section 29 of the Act, the Maureen Owners are required to submit a decommissioning programme for approval. The requirements are detailed in the DTI's Guidance Notes mentioned above.

Since the Maureen Owners are proposing complete removal of all the facilities to shore – with the exception of the Maureen Loading Pipeline – there are no UK regulatory requirement for detailed comparative assessments - apart for the pipeline. However, since 1993 the Maureen owners have undertaken some 70 separate studies in order to weigh the different factors (safety, technical feasibility, environmental impacts, impacts on other users of the sea and cost) and recommend the best decommissioning option for the Maureen facilities (see Section 17 of the Decommissioning Programme). These study reports are available at the Phillips Woking offices for viewing by appointment, as stated in the Decommissioning Programme.

On a more general note, the presumption that all offshore installations should be returned to shore for reuse, recycling or final disposal on land is enshrined in international and national law eg Geneva Convention 1958, UN Convention on the Law of the Sea, IMO Guidelines, OSPAR Convention and UK Petroleum Act. The recent OSPAR Decision 98/3 clarified the circumstances under which exceptions to this general principle might be considered. Having studied all the decommissioning options, the Maureen owners did not see any valid, or consistent, reason (technical, environmental, safety or cost) for asking the UK Government to apply for a derogation under OSPAR.

3. Specific queries

With regard to your query on section 2.7.3 on page 10 regarding the disturbance to drill cuttings during removal operations. This issue is analysed in greater detail in Section 7.10.7 through to 7.10.10. BMT carried out detailed surveys on drill cutting disturbance in general terms for the UKOOA Drill Cutting JIP. The Maureen owners then commissioned BMT to run the model on the Maureen cuttings layer. This Study is available for viewing (Item 20, Section 17).

In Section 7.10.5.3 you raised the point that there was an apparent ambiguity in statements with regard to the 'leave in place' impacts on the ecosystems and the fisheries. The explanation is that whilst evaluating the majority of environmental criteria in the context of 'ecosystems', 'leave in place' would have 'no impact'. However, in the context of 'fisheries' (in terms of fishing industry and not fish population), 'leave in place' could have an impact since fishing gear might cause disturbance to the cuttings layer.

You also make the point that there appears to be a great deal of space given to the subject of drill cuttings throughout the Decommissioning Programme. This is of course an area where there is still a great deal of uncertainty. The Maureen cuttings layer has been studied in great detail and it was felt important that as much of this information should be included in the main document as possible since the UKOOA Drill Cuttings JIP has not yet concluded.

**Figure 11-14 Letter to Wilkinson Environmental Consulting Ltd
(Continued)**

- 3 -

I hope that the above information will be useful to you and will answer your concerns.
Should you have any further queries, please do not hesitate to contact me.

Kind regards,

A handwritten signature in black ink, appearing to read 'G. M. Tilling', written in a cursive style.

G. M. Tilling
Decommissioning Manager
Phillips Petroleum Company United Kingdom Ltd
On behalf of the Maureen Owners

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