

BANFF AND KYLE FIELDS DECOMMISSIONING PROGRAMMES

P0009-CNR-EN-REP-00013

Draft Decommissioning Programmes

APPROVALS

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TERMS AND ABBREVIATIONS

Abbrev.	Definition
AUV	Autonomous Underwater Vehicle
BEIS	Department of Business, Environment and Industrial Strategy
CA	Comparative Assessment
CATS	Central Area Transmission System
Chem	Chemical
CNRI	CNR International (U.K.) Limited
CNS	Central North Sea
СоР	Cessation of Production
CO ²	Carbon Dioxide
Dia	Diameter
DP	Decommissioning Programme
DUTU	Dynamic Umbilical Termination Unit
EA	Environmental Appraisal
E&A	Exploration & Appraisal
EIA	Environmental Impact Assessment
Elec	Electric
EMS	Environmental Management Systems
EMT	Environmental Management Team
ENVID	Environmental Impact Identification
EU	European Union
ES	Environmental Statement
FPSO	Floating Production, Storage and Offloading vessel
FSO	Floating Storage and Offloading vessel
GHG	Greenhouse Gas
GMG	Global Marine Group
HSES	Health, Safety, Environment and Security
HSE	Health and Safety Executive
In	Inch
JNCC	Joint Nature Conservative Committee
ICES	International Council for the Exploration of the Seas
Km	Kilometre
М	Metre
M ²	Metre Squared
M^3	Cubic Metre
MAT	Master Application Template
MCA	Maritime and Coastguard Agency
MCDA	Multi Criteria Decision Analysis
Mm	Millimetre
MPA	Marine Protected Area
MS	Marine Scotland
N/A	Not Applicable
NCMPA	Nature Conservation Marine Protected Area
NFFO	National Federation of Fishermen's Organisation
NLB	Northern Lighthouse Board
NORM	Naturally Occurring Radioactive Material
NIFPO	Northern Irish Fish Producers Organisation
OBM	Oil Based Mud
ODU	Offshore Decommissioning Unit

Abbrev.	Definition	
OEI	Offshore Environmental Inspectorate	
OGA	Oil and Gas Authority	
O&G	Oil & Gas	
OGUK	Oil and Gas UK	
OPRED	Offshore Petroleum Regulator for Environment and Decommissioning	
OSPAR	Oslo Paris Convention	
PL	Pipeline	
PLEM	Pipeline End Manifold	
PLU	Pipeline Umbilical	
PWAV	Pipeline Works Authorisation Variation	
ROV	Remotely Operated Vehicle	
SAL	Submerged Anchor Loading	
STL	Subsea Turret Loading	
SAM	Subsea Accumulator Module	
SAT	Subsidiary Application Template	
SEPA	Scottish Environmental Protection Agency	
SDU	Subsea Distribution Unit	
SFF	Scottish Fishing Federation	
SOSI	Seabird Oil Sensitivity Index	
SSIV	Subsea Isolation Valve	
SSS	Side Scan Sonar	
TBC	To be Confirmed	
Те	Tonne	
TFSW	Trans Frontier Shipment of Waste	
TPFP	Teekay Petrojarl Floating Production UK Ltd	
TUTU	Topsides Umbilical Termination Unit	
UK	United Kingdom	
UKCS	United Kingdom Continental Shelf	
UKHO	United Kingdom Hydrographic Office	
USS	Ugland Stena Storage	
UTA	Umbilical Termination Assembly	
WIA	Well Intervention Application	
WONS	Well Operations Notification System	
WHPS	Wellhead Protection Structure	
WMP	Waste Management Plan	
VMS	Vessel Monitoring System	
XTs	Xmas Trees	

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1. EXECUTIVE SUMMARY

1.1 DECOMMISSIONING PROGRAMMES

This document contains the Decommissioning Programmes for the Banff and Kyle fields decommissioning activities and specifically covers:

- all subsea installations (including trees and wellheads) and stabilisation materials;
- drill cuttings;
- the pipelines (including spools and jumpers and stabilisation materials);
- remaining mooring infrastructure and associated remediation; and
- · well decommissioning.

The Banff and Kyle fields produced via a Floating Production Storage and Offloading Vessel (FPSO), the Petrojarl Banff FPSO and the Floating Storage Offloading Vessel (FSO), Apollo Spirit. The FPSO, FSO and associated risers and anchor systems (excluding steel piles) are covered under a separate and approved Decommissioning Programme (DP/163/19) during 2020. All activities associated with DP/163/19 have taken place and will be formally closed out by the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED) via an approved Decommissioning Programme Interim Close Out Report (approval anticipated May 2021).

1.2 REQUIREMENT FOR DECOMMISSIONING PROGRAMMES

Installations:

In accordance with the Petroleum Act 1998, the Section 29 notice holders of the Banff and Kyle fields Subsea Installations (see Table 1.2 and Table 1.8) are applying to the Offshore Petroleum Regulator for Environment & Decommissioning (OPRED) to obtain approval for decommissioning the installations detailed in Section 2.2 of this programme. See also Section 8 - Partner Letter(s) of Support.

Pipelines:

In accordance with the Petroleum Act 1998, the Section 29 notice holders of the Banff and Kyle fields pipelines (see Table 1.4, Table 1.6, Table 1.10 and Table 1.12) are applying to OPRED to obtain approval for decommissioning the pipelines detailed in Section 2.3 of this programme. See also Section 8 - Partner Letter(s) of Support.

In conjunction with public, stakeholder and regulatory consultation, the Decommissioning Programmes are submitted in compliance with national and international regulations and OPRED guidelines. The base case schedule outlined in this document (Section 6.3) is for a five year project plan, with offshore activities due to begin in 2022.

1.3 INTRODUCTION

The Decommissioning Programmes (DP) have been prepared to support the decommissioning of the Banff and Kyle fields.

The licencee submitted to the Oil & Gas Authority (OGA) for consideration a Cessation of Production (CoP) document which demonstrated that all economic development opportunities have been pursued for; the fields and associated infrastructure, current and future development opportunities, and consideration of access to current infrastructure.

Cess ation of Production from Banff and Kyle fields was approved on the 2^{nd} March 2020, and occurred on the 1^{st} June 2020.

The Banff and Kyle fields are subsea developments: Banff is located in United Kingdom Continental Shelf (UKCS) Blocks 29/2a and 22/27a in the UK Sector of the Central North Sea (CNS) some 200 km due east of Aberdeen in approximately 95 m water depth. Kyle is located in UKCS Block 29/2c and 29/2h in the UK Sector of the CNS some 200 km due east of Aberdeen in approximately 90 m water depth. The fields were tied back to Teekay Petrojarl Floating Production UK Ltd's (TPFP) Petrojarl Banff FPSO, where produced fluids were processed. Gas was used for gas lift, fuel and export to the Central Area Transmission System (CATS). The FPSO associated with the Banff and Kyle fields has been removed from station under the Banff and Kyle FPSO and FSO Float Off approved Decommissioning Programme (DP/163/19). The oil export route for the FPSO was via a submerged turret loading (STL) system through to the Apollo Spirit (FSO). Prior to this, oil was exported via a Submerged Anchor Loading (SAL) system. The components of this system within the water column were decommissioned via an approved decommissioning programme in 2019.

The main components of the Banff and Kyle subsea fields consists of: 3 drill centres (one for Banff fields and two for the Kyle field), 8 production wells, 1 gas lift well, 15 exploration/appraisal wells (10 of which have been fully a bandoned), 5 production manifolds, 9 riser bases, 1 suction base, several pipelines and umbilicals.

Following public, stakeholder and regulatory consultation, the Decommissioning Programmes are submitted without derogation and in full compliance with OPRED and Oil & Gas UK Guidelines. The Decommissioning Programmes explain the principles of the decommissioning activities and are supported by a Comparative Assessment (CA) of decommissioning options and an Environmental Appraisal (EA).

1.4 OVERVIEW OF THE INSTALLATIONS BEING DECOMMISSIONED

1.4.1 INSTALLATIONS- BANFF FIELDS

Water Depth (m) Approx. 90 m UKCS block 29/2a & 22/27a Subsea Installation(s) Number Type Platform Subsea 1 x Gas Export Tether Base 1 x Banff Dynamic Umbilical Termination Unit (DUTU) Structure 1 x Banff Py Production Riser Base 1 x Banff Gas Uffy Injection Riser Base 1 x Banff Gil Export Tether Base 1 x Banff Oil Export STL Tether Base 1 x Banff Umbilical Tether Base Anode Skid B 1 x Gas Export Tether Base Anode Skid B 1 x Gas Export Tether Base Anode Skid B 1 x Gas Export Tether Base Anode Skid B 1 x Gas Export Tether Base Structure Anode Skid B 1 x Dil Export Tether Base Structure Anode Skid B 1 x Pipeline End Manifold (PLEM) Tee 1 x Banff Gas Uff / Injection Manifold 1 x Banff Gas Uff / Injection Manifold 1 x Banff Gas Uff / Injection Manifold 1 x Banff Gas Uff / Looke Manifold 5 x Xmas Trees (XT) 4 x Abandoned Guide Base	Table 1.1: Installations		s Being Decommissioned	
Subsea Installation(s) Number of Wells	Fields:	Banff		Oil and Gas
Number Type Platform Subsea 30	Water Depth(m)	Approx. 90 m		29/2a & 22/27a
1 x Gas ExportTether Base 1 x Banff Dynamic Umbillical Termination Unit (DUTU) Structure 1 x Banff P1 Production Riser Base 1 x Banff P2 Production Riser Base 1 x Banff P2 Production Riser Base 1 x Banff Gas Lift / Injection Riser Base 1 x Banff Oil Export Tether Base 1 x Banff Oil Export STL Tether Base 1 x Banff Suction Base (SAL Anchor Base) 1 x Pipeline End Manifold (PLEM) Tee 1 x Banff Umbilical Tether Base 1 x Banff Umbilical Tether Base Anode Skid A 1 x Banff Umbilical Tether Base Anode Skid A 1 x Gas Export Tether Base Anode Skid B 1 x Gas Export Tether Base Anode Skid B 1 x Gas Export Tether Base Structure Anode Skid B 1 x Oil Export Tether Base Structure Anode Skid B 1 x Oil Export Tether Base Structure Anode Skid B 1 x Pipeline End Manifold (PLEM) Tee Anode Skid 1 x Panff Production Manifold 1 x Banff Gas Lift / Injection	Subsea	Installation(s)	Number of Wells	
1 x Banff Dynamic Umbilical Termination Unit (DUTU) Structure 1 x Banff P1 Production Riser Base 1 x Banff P2 Production Riser Base 1 x Banff Gas Lift/Injection Riser Base 1 x Banff Gas Lift/Injection Riser Base 1 x Banff Oil Export Tether Base 1 x Banff Oil Export STL Tether Base 1 x Banff Oil Export STL Tether Base 1 x Banff Umbilical Tether Base 1 x Banff Umbilical Tether Base 1 x Banff Umbilical Tether Base Anode Skid A 1 x Banff Umbilical Tether Base Anode Skid B 1 x Gas Export Tether Base Anode Skid B 1 x Gas Export Tether Base Anode Skid B 1 x Gas Export Tether Base Structure Anode Skid B 1 x Oil Export Tether Base Structure Anode Skid B 1 x Pipeline End Manifold (PLEM) Tee Anode Skid 1 x Dil Export Tether Base Structure Anode Skid 1 x Dil Export Tether Base Structure Anode Skid 1 x Banff Gas Lift / Injection Manifold 1 x Banff Gas Lift / Choke Manifold 5 x Xmas Trees (XT) 4 x Abandoned Guide Base	Number	Туре	Platform	Subsea
		1 x Banff Dynamic Umbilical Termination Unit (DUTU) Structure 1 x Banff P1 Production Riser Base 1 x Banff P2 Production Riser Base 1 x Banff Gas Lift/ Injection Riser Base 1 x Banff Oil Export Tether Base 1 x Banff Oil Export STL Tether Base 1 x Banff Suction Base (SAL Anchor Base) 1 x Pipeline End Manifold (PLEM) Tee 1 x Banff Umbilical Tether Base 1 x Banff Umbilical Tether Base Anode Skid A 1 x Banff Umbilical Tether Base Anode Skid B 1 x Gas Export Tether Base Anode Skid A 1 x Gas Export Tether Base Anode Skid B 1 x Gas Export Tether Base Structure Anode Skid A 1 x Oil Export Tether Base Structure Anode Skid B 1 x Pipeline End Manifold (PLEM) Tee Anode Skid 1 x Banff Production Manifold 1 x Banff Gas Lift / Injection Manifold 1 x Banff Gas Lift / Injection Manifold 1 x Banff Gas Lift / Choke Manifold 5 x Xmas Trees (XT) 4 x Abandoned Guide Base		
Drill Cuttings pile(s) Distance to median UK Coastline	Drill C	uttings pile(s)	Distance to median	Distance from nearest

Number of Piles	Total Estimated volume (m³)	km	km
1	3,580	63 km (UK/Norway)	191 km (Peterhead)

Table 1.2 Installation Section 29 Notice Holders Details			
Installation	Section 29 Notice Holders	Registration Number	
	Banff L.L.C	962000	
	CNR International (U.K.) Developments Limited	01021629	
Floating	CNR International (U.K) Limited	00813187	
Production, Storage and Office diag (FRSO)	Chrysaor Production (U.K.) Limited	00524868	
Offloading (FPSO) vessel and subsea installations.	Dana Petroleum (E&P) Limited	02294746	
	Teekay Petrojarl Floating Production UK Ltd	02436350	
	Altera Infrastructure Production AS	939545832	
	Chrysaor Production (U.K.) Limited	00524868	
Floating Storage	CNR International (U.K) Limited	813187	
Offloading (FSO) Apollo Spirit and subsea equi pment.	Ugland Stena Storage AS	882 048 152	
	CNR International (U.K.) Developments Limited	1021629	
	Dana Petroleum (E&P) Limited	2294746	

1.4.2 PIPELINES- BANFF FIELDS

Table 1.3: Pipelines Being Decommissioned-Banff		
Number of Pipeline(s) Details given in Table 2.3	8	
Number of Umbilical (s) Details given in Table 2.3	11	
Number of Subsea Pipeline(s) Structures Details given in	1	
Table 2.4		

Table 1.4: Pipeline Section 29 Notice Holders Details			
Fields Section 29 Notice Holders Registration Number			
Banff Fields Pipelines	Teekay Petrojarl Floating Production UK Ltd	02436350	

Table 1.5: Pipelines Being Decommissioned		
Number of Pipeline(s) Details given in Table 2.3	10	
Number of Umbilical (s) Details given in Table 2.3	1	
Number of Subsea Pipeline(s) Structures Details given in	1	
Table 2.4		

Table 1.6: Pipeline Section 29 Notice Holders Details			
Fields Section 29 Notice Holders Registration Number			
Banff Fields Pipelines	CNR International (UK) Developments Ltd	01021629	
	CNR International (UK) Ltd	00813187	
	Dana Petroleum (E&P) Ltd	02294746	

1.4.3 INSTALLATIONS- KYLE FIELDS

Table 1.7: Installations Being Decommissioned			
Fields:	Kyle	Production Type (Oil/Gas/Condensate)	Oil and Gas
Water Depth (m)	Approx. 90 m	UKCS block	29/2c & 29/2h
Subsea	Installation(s)	Number	of Wells
Number	Туре	Platform	Subsea
16	1 x Kyle North SDU / SAM Structure 1 x Kyle North Gas Lift / Choke Manifold 1 x Kyle North Drill Centre Valve Structure (NDC Tee) 1 x Kyle North SDU / SAM Structure (Disconnected Structure) 1 x Kyle North Production Riser Base 1 x Kyle North Umbilical Riser Base 1 x Kyle South 12" Tee Structure 1 x Kyle South Gas Lift / Choke Manifold 1 x Kyle South Drill Centre Valve Structure (8" Tee Structure) 4 x Xmas Trees 1 x Abandoned Guide Base 1 x Curlew DUTU Structure 1 x Tee connector	N/A	4
Drill Cu	ttings pile(s)	Distance to median	Distance from nearest UK Coastline
Number of Piles	Total Estimated volume (m³)	km	km
1	1,432	63 km (UK/Norway)	191 km (Peterhead)

Table 1.8 Installation Section 29 Notice Holders Details			
Installation	Section 29 Notice Holders	Registration Number	
Kyle Subsea Installations	CNR International (UK) Developments Ltd	01021629	
	CNR International (UK) Ltd	00813187	
	Dana Petroleum (BVUK) Ltd	03337437	
	Harbour Energy plc	SC234781	
	Premier Oil UK Ltd	SC048705	

1.4.4 PIPELINES- KYLE FIELDS

Table 1.9: Pipelines Being Decommissioned		
Number of Pipeline(s) Details given in Table 2.3	42	
Number of Umbilical(s) Details given in Table 2.3	10	
Number of Subsea Pipeline(s) Structures Details given in	3	
Table 2.4		

Table 1.10: Pipeline Section 29 Notice Holders Details			
Fields	Section 29 Notice Holders	Registration Number	
Kyl e Pi pelines	CNR International (UK) Developments Ltd	01021629	
	CNR International (UK) Ltd	00813187	
	Dana Petroleum (BVUK) Ltd	03337437	
	Harbour Energy plc	SC234781	
	Premier Oil UK Ltd	SC048705	

Table 1.11: Pipelines Being Decommissioned		
Number of Pipeline(s) Details given in Table 2.3	15	
Number of Umbilical(s) Details given in Table 2.3	1	

Table 1.12: Pipeline Section 29 Notice Holders Details			
Fields Section 29 Notice Holders		Registration Number	
Kyle Pi pelines	CNR International (UK) Developments Ltd	01021629	
	CNR International (UK) Ltd	00813187	
	Dana Petroleum (BVUK) Ltd	03337437	
	Premier Oil UK Ltd	SC048705	

1.5 SUMMARY OF PROPOSED DECOMMISSIONING PROGRAMMES

Table 1.13: Summary of Decommissioning Programmes			
Selected Option	Reason for Selection	Proposed Decommissioning Solution	
1. Subsea Installations			
Group 6*: All subsea installations will be removed from the seabed. Note 1 Full Removal	In line with current guidance and removes snagging risk.	Full Removal. Returned to shore for recycling or appropriate treatment and disposal.	
2. Pipelines			
Group 1*: Trenched and Buried Rigid Pipelines Leave in-situ	Comparatively assessed as preferred option. The rigid flowlines are trenched and buried and stable, posing no risk to marine users. Minimal seabed disturbance, lower energy use, reduced risk to personnel engaged in the activity.	Leave in-situ. Exposed ends & areas of spans/ exposure/ shallow burial to have rock placement. Local rock placement to mitigate s nag hazard from cut ends. Group 1 is expected to have minimal spans and exposures, however none of the spans met the reportable criteria.	
Group 2*: Trenched & Buried Flexible Flowlines & Umbilical Leave in-situ	Comparatively assessed as preferred option. The flexible flowlines are sufficiently trenched and buried and stable posing no risk to marine users. Minimal seabed disturbance, lower	Leave in-situ. Exposed ends & areas of spans/ exposure/ shallow burial to have rock placement. Local rock placement to mitigate snag hazard from cut ends.	

	energy use, reduced risk to personnel	
	engaged in the activity.	
Group 3*: Surface Laid	In line with current guidance and	Full Removal.
Flexible Flowlines & Umbilical	removes snagging risk.	Returned to shore for recycling or
Full Removal		appropriate treatment and disposal.
Group 4*: Trenched with Rock Placement	Comparatively assessed as preferred	Leave in-situ.
Rigid Pipelines	option. The rigid flowlines are	Exposed ends & areas of exposure to
Leave in situ	trenched with rock placement and are	
Leavemisita	stable, posing no risk to marine users.	placement to mitigate snag hazard from
	Minimal seabed disturbance, lower	cut ends. There are no spans or
	energy use, reduced risk to personnel	exposures expected for pipelines in
	engaged in the activity.	Group 4.
3. Pipeline Structures	1 - 0-0	l
Group 5*: Surface Laid	In line with current guidance and	Full Removal.
Spools and Jumpers	removes snagging risk.	Returned to shore for recycling or
Full Removal	Temoves smagging risk.	appropriate treatment and disposal.
T dir Nemoval		appropriate a calmentaria disposan
Group 7*- Protection/ Stabilisation	In line with current guidance and	Full Removal.
features ¹ .	removes snagging risk.	Returned to shore for recycling or
Full Removal		appropriate treatment and disposal.
4. Mooring and Related Scour		
Group 8*: Mooring Piles and remaining	In line with current guidance and	Mooring Anchor Piles will be cut below
chains and related s cour Note 2&3	removes snagging risk.	the natural seabed. Targeted
Full Removal		remediation-pending additional
		studies; however, outcome will be
		discussed with the Regulator. Mooring
		chains will be removed.
5. Drill Cuttings		
J. Dim Cuttings	Screening of drill cuttings based on	Given the low amount of Oil Based Mud
	desktop exercise and pre-	(OBM) discharges, other sources of
Drill cuttings present.	decommissioning environmental	contamination and lack of physical
Leave in situ	survey data. Drill cuttings fall below	cuttings pile, any cuttings should be left
	OSPAR Thresholds.	to degrade naturally.
		• • • • • • • • • • • • • • • • • • •
6. Wells		
Wells will be decommissioned to CNR	Meets HSE Regulatory requirements	A Master Application Template (MAT)
International (UK) Ltd. standards which	in accordance with O&G UK and OGA	and the supporting Subsidiary
comply with "Offshore Installations and	guidelines.	Application Template (SAT) will be
Wells (Design and Construction, etc.)		submitted in support of activities
Regulations 1996" and align with Oil &		carried out.
Gas UK Well Decommissioning Guidelines		

 $^{^{\}rm 1}$ All stabilisation material removal is subject to feasibility.

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for the Suspension and Abandonment of Wells (Issue 6, June 2018).	Applications to decommission the wells will be submitted through the Wells Operations Notification Systems
	(WONS). Additionally, planned work will be reviewed by a well examiner to CNRI standards, and then submitted to the HSE for review.
7 Intendencial	

7. Interdependencies

No third-party pipeline crossings will be disturbed as a result of the decommissioning proposals.

Subsea infrastructure and pipelines have been flushed and cleaned prior to the commencement of subsea decommissioning operations.

Pipeline stabilisation features such as concrete mattresses and any grout bags found that are exposed (i.e. not fully or partially buried under deposited rock) will be removed as part of the pipeline decommissioning activities. Although some deposited rock will be disturbed during the removal activities, it will remain *in situ*.

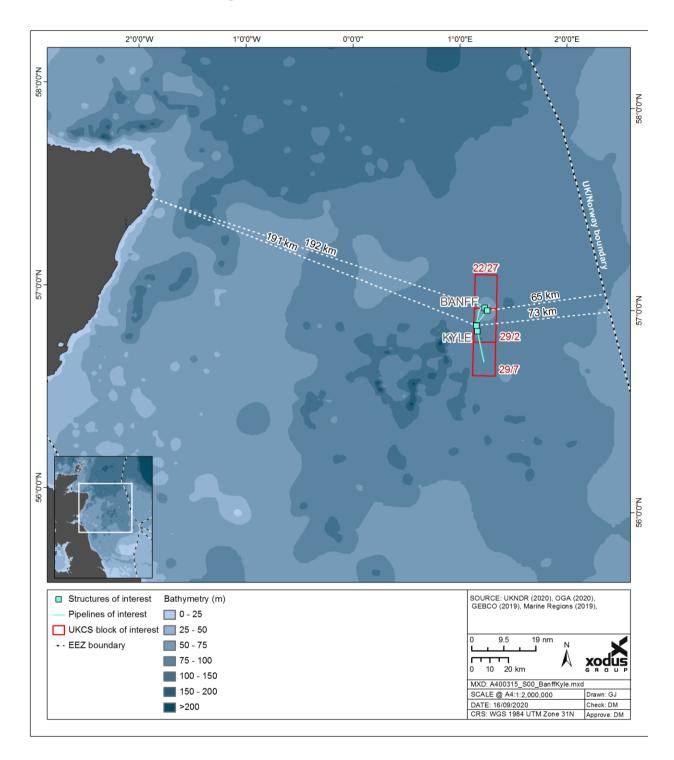
Notes

- 1. For the SAL Suction Base CNRI will seek to remove by reverse installation however there are known difficulties with the recovery of suction anchors driven by the integrity of the system to retain pressure and the unknown ability for the soil plug to withstand the pressure. In the event the suction base cannot be recovered in its current configuration, potential snagging risk caused by the in-situ anchor base will be mitigated by rock. This back up option has been captured by the environmental assessment supporting this decommissioning programme.
- 2. CNRI are conducting a study of these features to determine the most appropriate method of targeted remediation and will monitor the depressions in the interim to assess change over time. The results of the study will be relayed to OPRED and a discussion will be initiated to determine the most appropriate course of action. The method of remediation is therefore yet to be determined, with the worst-case assumption involving the placement of rock to fill the dimensions of the trenches. Any future remediation activities relating to the mooring depressions in the Banff Field will also be covered by the applicable permitting. The mooring and anchor features associated with the Banff FPSO moorings have been added to Kingfisher and FishSafe system.
- 3. In line with current guidance, in this instance any piles should be severed below the natural seabed level at such a depth to ensure that any remains are unlikely to become uncovered. CNRI will aim to a chieve a cut depth of 3 m below the natural seabed level, however consideration will be given to the prevailing seabed conditions and currents. However, any deviation from the -3 m pile cut will be discussed and agreed with OPRED.

^{*}Refers to the Inventory Group Categories as defined in the Comparative Assessment Report.

1.6 FIELDS LOCATION INCLUDING FIELDS LAYOUT AND ADJACENT FACILITIES

Figure 1.1 Fields Location on the UKCS



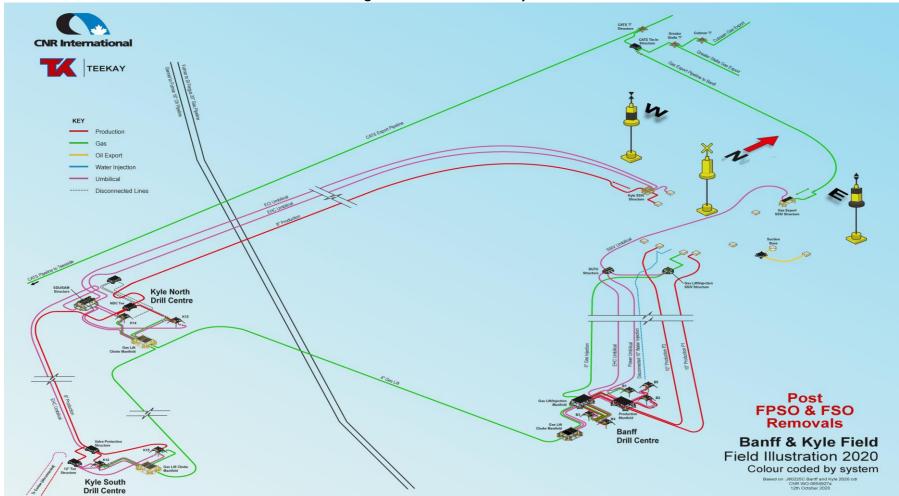


Figure 1.2 Current Fields Layout

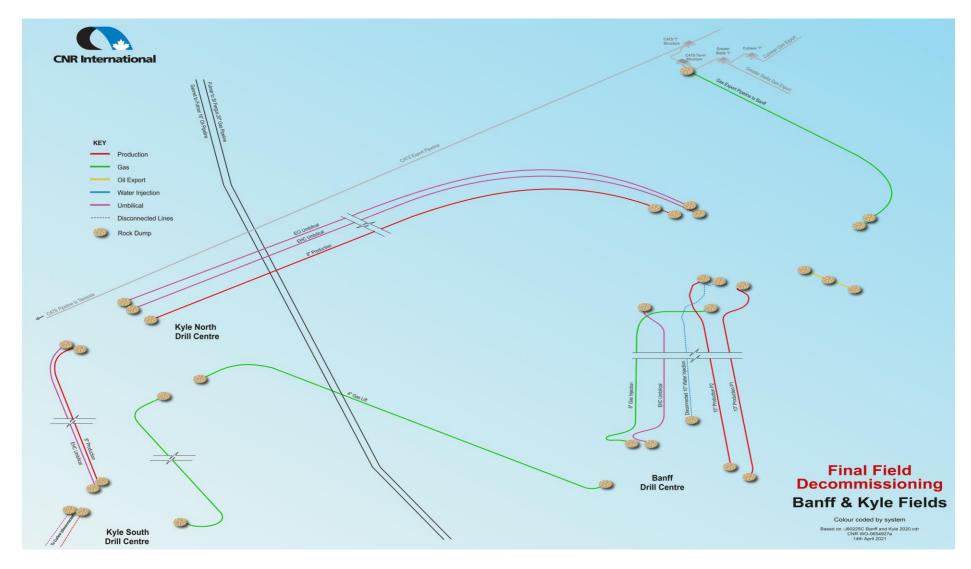


Figure 1.3 Post Decommissioning Fields Layout

Table 1.14 Adjacent Facilities								
Operator	Name	Туре	Distance/ Direction	Information	Status			
CATS North Sea Limited	CATS 36" Export Pipeline	Gas	8 km NW of FPSO 500 m zone	Gas export tie in route for Banff FPSO	Active			
Ithaca Energy (UK) Limited	Stella to CATS 10" Export Pipeline	Gas	8 km NW of FPSO 500 m zone	3 rd party ti e-in to Banff valve structure at CATS T5.	Active			
Total E&P North Sea U.K Limited	Culzean to CATS 22" Export Pipeline	Gas	8 km NW of FPSO 500 m zone	3 rd party tie-into Stella valve structure at CATS T5.	Active			
Shell U.K. Limited	Fulmar to St Fergus 20" Gas Pipeline	Gas	5 km west of FPSO 500 m zone at closest point	Crossed by Kyle flowlines, umbilicals, and the Banff to Kyle gas lift line.	Active			
Shell U.K. Limited	Gannet to Fulmar 16" Oil Pipeline	Oil	5 km west of FPSO 500 m zone at closest point	Crossed by Kyle flowlines, umbilicals, and the Banff to Kyle gas lift line.	Active			
Shell U.K. Limited	Gannet to Fulmar 16" Oil Pipeline	Oil	5 km west of FPSO 500 m zone at closest point	Cut and disused.	Inactive			
Shell U.K. Limited	Gannet A Platform	Oil	27 km NW FPSO 500 m zone at clos est point	Producing Platform	Active			
Dana Petroleum (E&P) Limited	Triton FPSO	Oil	25 km West FPSO 500 m zone at clos est point	Producing FPSO	Active			
Total E&P North Sea U.K Limited	Elgin and Franklin	Gas & condensate	30 km East FPSO 500 m zone at clos est point	Producing Platform	Active			
Shell U.K. Limited	Shearwater	Gas	40 km East FPSO 500 m zone at clos est point	Producing Platform	Active			

Impacts of Decommissioning Proposals

Note: Adjacent facilities refer to those potentially impacted by this programme (within 40 km)

The Banff and Kyle fields decommissioning activities are planned so they will not affect the decommissioning of other fields or the operation of other developments in the area. The environmental appraisal will consider the potential cumulative implications of decommissioning activities in context of other oil and gas/other industry activities in the area.

As part of the operational phase, any potential impacts will be mitigated in two ways: the first is via direct communication with the parties involved, and the other is via submission of the Master Application Templates (MATs) and Subsidiary Application Templates (SATs).

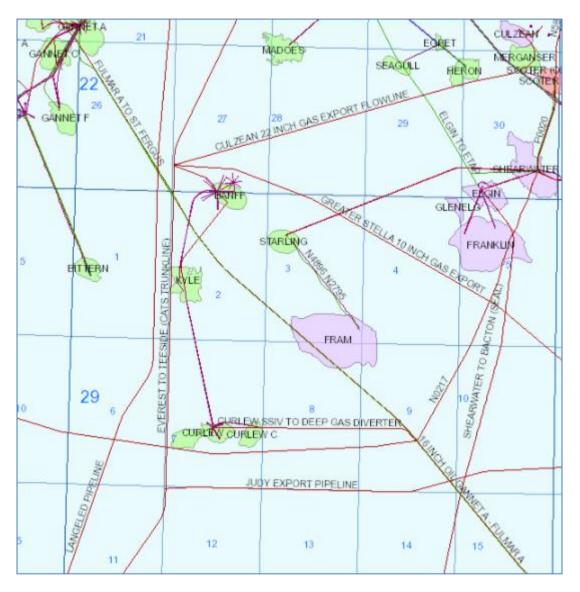


Figure 1.4 Adjacent Facilities

1.7 INDUSTRY IMPLICATIONS

The Banff and Kyle fields decommissioning activities will be managed by CNRI in Aberdeen. Reasonable efforts will be made to plan decommissioning activities for the DP to realise synergies and efficiencies in offshore execution. Furthermore, in line with the OGA's (2021) Net Zero Stewardship Expectations 11, CNRI will look to plan and execute decommissioning activities to reduce Greenhouse Gas (GHG). CNRI will actively engage with industry to further reduce GHG through scope aggregations and optimising decommissioning activities.

The activities to decommission the Banff and Kyle fields will be completed using selected marine vessels and equipment that comply with technical and safety expectations.

It is CNRI's intention to develop a contract strategy and Supply Chain Action Plan that will result in an efficient and cost-effective execution of the decommissioning works for this DP. Where a ppropriate existing framework agreements may be used for such decommissioning activities.

CNRI will look for opportunities to combine Banff and Kyle decommissioning activities with other developments or decommissioning activities to improve cost efficiency should the opportunity arise. The decommissioning schedule is designed to allowflexibility for when decommissioning operations are carried out and completed.

2. DESCRIPTION OF ITEMS TO BE DECOMMISSIONED

2.1 INSTALLATIONS: SUBSEA INCLUDING STABILISATION FEATURES

Table 2.1: Subsea Installations and Stabilisation Features								
Subsea installations including stabilisation features	Number	Size (m)/ Weight (Te)		ocation	Comments/Status			
Gas Export Tether Base	1	L 7 x W 7 x H 2.9 39 Te	WGS84 Decimal WGS84 Decimal Minute	57.001954°N 01.295630°E 57° 00' 7.0344 N 01° 17' 44.2680 E	Gravity Based			
Banff Dynamic Umbilical Termination Unit (DUTU) Structure	1	L 7.5 x W 5.5 x H 2.9 42 Te	WGS84 Decimal WGS84 Decimal Minute	57.000742°N 01.296712°E 57° 00′ 2.6712 N 01° 17′ 48.1630 E	Gravity Based			
Banff P1 Production Riser Base	1	L 8.7 x W 4.5 x H 4.3 69 Te	WGS84 Decimal WGS84 Decimal Minute	57.001954°N 01.295630°E 57° 00′ 7.0344 N 01° 17′ 44.2680 E	Gravity Based			
Banff P2 Production Riser Base	1	L 8.7 x W 4.5 x H 4.3 69 Te	WGS84 Decimal WGS84 Decimal Minute	57.001647°N 01.295176°E 57° 00′ 5.9292 N 01° 17′ 42.6340 E	Gravity Based			
Banff Gas Lift/ Injection Riser Base	1	L 8.7 x W 4.5 x H 4.3 69 Te	WGS84 Decimal WGS84 Decimal Minute	56.991143°N 01.315387°E 56°59'28.1148 N 01°18'55.3930 E	Gravity Based			
Banff Oil Export Tether Base	1	L 7 x W 7 x H 2.9 39 Te	WGS84 Decimal WGS84 Decimal Minute	57.003497°N 01.295380°E 57° 00′ 12.5892 N 01° 17′ 43.3680 E	Gravity Based			
Banff Oil Export STL Tether Base	1	L 4 x W 3 x H 1.4 40 Te	WGS84 Decimal WGS84 Decimal Minute	57.011658°N 01.326339°E 57°00′41.97N 01°19′34.82E	Gravity Based			
Banff Suction Base (SAL Anchor Base)	1	L 9.0 x W 9.0 x H 16.7 186.0 Te	WGS84 Decimal WGS84 Decimal Minute	56.989061°N 01.275433°E 56°59′20.62 N 01°16′31.56 E	Suction based anchor			
Pipeline End Manifold (PLEM) Tee	1	L 3.1 x W 3 x H 1.7 8 Te	WGS84 Decimal	56.989061°N 01.275433°E	Gravity Based			

			WGS84	56°59′20.62N		
			Decimal Minute	01°16′31.56E		
			WGS84	57.001662°N		
Banff Umbilical		L 2.5 x W 1.5 x H	Decimal	01.294756°E	Connected to Banff	
Tether Base Anode Skid A	1	0.5 1.5 Te	WGS84	57°00′5.9832N	Umbilical Tether Base	
			Decimal Minute	01°17′41.1220 E		
			WGS84	57.001662°N		
Banff Umbilical		L 2.5 x W 1.5 x H	Decimal	01.294756°E	Connected to Banff	
Tether Base Anode Skid B	1	0.5 1.5 Te	WGS84	01.294756°E	Umbilical Tether Base	
			Decimal Minute	01°17′41.1220 E		
			WGS84	57.003474°N		
Gas Export		L 2.5 x W 1.5 x H	Decimal	01.293708°E	Connected to Gas	
Tether Base Anode Skid A	1	0.5 1.5 Te	WGS84 Decimal Minute	57°00′12.5064N	Export Tether Base	
				01°17′37.3490E		
	1	L 2.5 x W 1.5 x H 0.5 1.5 Te	WGS84 Decimal	57.003474°N		
Gas Export				01.293708°E	Connected to Gas	
Tether Base Anode Skid B			WGS84 Decimal Minute	57°00′12.5064N	Export Tether Base	
				01°17′37.3490E		
	1	L 2.1 x W 1.5 x H 0.5 1.2 Te	WGS84 Decimal	57.004124°N		
Gas Export SSIV				01.293566°E	Connected to Gas	
Anode Skid			WGS84	57°00′14.8464 N	Export SSIV	
			Decimal Minute	01°17′36.8380E		
			WGS84	57.011658°N		
Oil Export Tether	4	L 2.5 x W 1.5 x H	Decimal	01.326339°E	Connected to Oil	
Base Structure Anode Skid A	1	0.5 1.5 Te	WGS84	57°00′41.97N	Export Tether Base	
			Decimal Minute	01°19′34.82E		
				57.011658°N		
Oil Export Tether			WGS84 Decimal			
Base Structure	1	L 2.5 x W 1.5 x H 0.5	_ 55161	01.326339°E	Connected to Oil Export Tether Base	
Anode Ski d B		1.5 Te	WGS84	57°00′41.97N		
			Decimal Minute	01°19′34.82E		

		1		T		
			WGS84	56.989061°N		
Pipeline End Manifold (PLEM)	1	L 0.75 x W 0.5 x H 0.2	Decimal	01.275433°E	Connected to 12"	
Tee Anode Skid	T	0.2 0.5 Te	WGS84 Decimal	56°59′20.62N	Hose connection at PLEM	
			Minute	01°16′31.56E		
			WGS84	57.001662°N		
Banff Umbilical		L7xW7xH2.9	Decimal	01.294756°E		
Tether Base	1	39 Te	WGS84	57°00′5.9832N	Gravity Based	
Tetrici base		3310	Decimal Minute	01°17′41.1220 E		
			WGS84	56.991374°N		
		L18xW16xH	Decimal	01.315492°E		
Banff Production	1	5.2	WGS84	56°59′28.9464 N	Gravity Based	
Manifold		209.9Te	Decimal Minute	01°18′55.7710 E		
			WGS84	56.991143°N		
Banff Gas Lift /		L 18 x W 14 x H	Decimal	01.315387°E	Cravity Based	
Injection	1	4.8	WGS84	56°59′28.1148 N	Gravity Based	
Manifold		40 Te	Decimal Minute	01°18′55.3930 E		
			WGS84	56.991131°N		
Dontt Coolift /	1	L 13 x W 11 x H 3.7 66 Te	Decimal	01.316134°E	Cravity Daged	
Banff Gas Lift / Choke Manifold			WGS84	56°59′28.0716 N	Gravity Based	
CHOKE Mailiolu			Decimal	01°18′58.0820 E		
			Minute			
Kyle North			WGS84	56.915975°N		
Subsea		L 9.0 x W 8.0 x H	Decimal	01.222099°E		
Distribution Unit (SDU)/ Subsea				56°54′57.5107 N	Gravity Based	
Accumulator Module (SAM) Structure- Kyle North	1	1.9 4.9 Te	WGS84 Decimal Minute	01°13′19.556 E	Gravity baseu	
			WGS84	56.915702°N		
Kyle North Gas		L13xW11xH	Decimal	01.223444°E		
Lift / Choke Manifold	1	3.7 66 Te	WGS84 Decimal	56°54′56.5272 N	Gravity Based	
Width Told		0010	Minute	01°13′24.3980E		
Kylo North Drill			WGS84	56.916042°N		
Kyle North Drill Centre Valve		L 10 x W 8 x H 2.4	Decimal	01.222480°E		
Structure (NDC	1	75 Te	WGS84	56°54′57.7512 N	Gravity Based	
Tee)		7510	Decimal Minute	01°13′20.9280E		
			WGS84	57.002622°N		
Kyle North		L8xW8xH3.2	Decimal	01.292028°E	Gravity Based	
Production Riser	1	86 Te	WGS84	57°00′9.4392 N	S. a v. cy Basea	
Base			Decimal Minute	01°17′31.3010E		
Kyle North		L8xW8xH3.2	WGS84	57.002798°N	Gravity Based	
Umbilical Riser	1	48 Te	Decimal	01.292188°E	Gravity basea	
Base		3		57°00′10.0728 N		

		 	W. 000 :	T	Г	
			WGS84 Decimal Minute	01°17′31.8770E		
Kyle North			WGS84	56.916324°N		
Disconnected		L 7.6 x W 6.8 x H	Decimal	01.221626°E	Gravity Based	
Structure (old SDU/SAM	1	1.8 4.9 Te	WGS84	56°54′58.7664 N	,	
Structure)-		4.9 Te	Decimal			
oti detai ej			Minute	01°13′17.8540 E		
Abandoned		L 6.2 x W 4.3 x H	WGS84	56.915055°N 01.221647°E		
Umbilical Tee	1	1.3	Decimal WGS84	56°54′54.20 N	Weightis	
Connector at KN	-	23Te	Decimal		approximate	
			Minute	01°13′17.93 E		
			WGS84	56.880601°N		
		L 11.8 x W 8.8 x H	Decimal	01.2334611°E		
Kyle South 12" Tee Structure	1	2.2 40.1 Te	WGS84 Decimal	56°52′50.1636 N	Gravity Based	
			Minute	01°14′0.4600E		
			WGS84	56.887324°N		
Kyle South Gas		L 13 x W 11 x H	Decimal	01.233801°E		
Lift / Choke Manifold	1	3.7 209.9 Te	WGS84 Decimal	56°53′14.3664 N	Gravity Based	
Warm ora		203.3 10	Minute	01°14′1.6840E		
			WGS84	56.887145°N		
Kyle South Drill		L 10 x W 8 x H 2.4 75 Te	Decimal	01.232812°E		
Centre Valve Structure (8" Tee	1		WGS84 Decimal	56°53′13.7220 N	Gravity Based	
Structure)			Minute	01°13′58.1230 E		
			WGS84	56.737768°N		
Curlew DUTU	1	L 2.9 x W 1.3 x H 1.3	Decimal	01.703325°E	Gravity Based	
Structure		1.8 Te	WGS84 Decimal	56°44′15.9648N		
			Minute	01°42′11.97 E		
],, _		. 	WGS84	56.989494°N		
Xmas Trees (XT)	4	L 5.3 x W 5.3 x H	Decimal	01.313761°E	Attached to wellhead	
with guide base Well B1- Banff	1	5.2 40 Te	WGS84	56°59′22.18 N		
Men RT-RAULL		4018	Decimal Minute	01°18′49.54E		
			WGS84	56.999928°N		
XT with guide		L 5.3 x W 5.3 x H	Decimal	01.313761°E	Attached to wellhead	
base Well B2-	1	5.2	WGS84	56°59′59.74 N	Allached to Weilliedu	
Banff		40 Te	Decimal	01°18′49.54E		
			Minute WGS84	56.989997°N		
XT with guide		L 5.3 x W 5.3 x H	Decimal	01.316022°E		
base Well B3-	1	5.2	WGS84	56°59′23.99 N	Attached to wellhead	
Banff		40 Te	Decimal			
			Minute	01°18′57.68E		

Г		I	WCC04	E7 000117°N	I	
VT with guide		L 5.3 x W 5.3 x H	WGS84	57.989117°N 01.316069°E	-	
XT with guide base Well B4-	1	5.2	Decimal WGS84	57°59′20.82 N	Attached to wellhead	
Banff	1	40 Te	Decimal			
Danni		4010	Minute	01°18′57.85E		
			WGS84	57.029131°N		
XT with guide		L 5.3 x W 5.3 x H	Decimal	01.202039°E	Attached to wellhead	
base Well B5-	1	5.2	WGS84	57°01′44.87″ N		
Banff		40 Te	Decimal		1	
			Minute	01°12′07.34″ E		
			WGS84	56.915922°N		
XT with guide		L 5.3 x W 5.3 x H	Decimal	01.222762°E	Attached to wellhead	
base Well K14-	1	5.2	WGS84	56°54′57.3192 N	Attached to Weimlead	
Kyle North		40 Te	Decimal	01°13′21.9430E		
			Minute			
			WGS84	56.916067°N		
XT with guide		L 5.3 x W 5.3 x H	Decimal	01.223383°E	Attached to wellhead	
base Well K13-	1	5.2	WGS84	56°54′57.8412 N		
Kyle North		40 Te	Decimal	01°13′24.1790E		
			Minute	FC 00712C°N		
XT with guide		L 5.3 x W 5.3 x H	WGS84 Decimal	56.887136°N 04.233584°E	-	
base Well K12-	1	5.2	WGS84	56°53′13.6896 N	Attached to wellhead	
Kyle South	1	5.2 40 Te	Decimal	30 33 13.0690 N		
Ryresouth		4010	Minute	04°14′0.9020E		
		L 5.3 x W 5.3 x H 5.2 40 Te	WGS84	56.887406°N		
XT with guide			Decimal WGS84	04.233643°E	Attached to wellhead	
base Well K15-	1			56°53′14.6616 N	, recovered to wermed	
Kyle South			Decimal	04°14′1.1150E		
			Minute			
	1	L 9.4 x W 9.4 x H 3.1 11.25 Te	WGS84	56.915902°N	Attached to wellhead	
Abandoned			Decimal	01.223133°E		
Guide Base- well 29/02c-14			WGS84	56°54′57.2472 N		
			Decimal Minute	01°13′23.2790E		
			WGS84	56.991074° N		
Abandoned		L 2.8 x W 2.8 x H	Decimal	01.318212°E		
Guide Base- well	1	3	WGS84	56°59'23.293N	Attached to wellhead	
29/02a-6z		6 Te	Decimal			
			Minute	1°19'6.067E		
			WGS84	56.987328° N		
Abandoned Guide Base- well 29/2a-7	1	L 2.8 x W 2.8 x H	Decimal	01.31419°E	Attached to wellhead	
		3 6 Te	WGS84	56°59'9.810N		
			Decimal Minute	1°18'51.590E		
Abandoned		L 3 x W 3.2 x H 4	WGS84	56.995634°N	Attached to wellhead	
Guide Base- well 29/02a-10	1	5.5 Te	Decimal	01.289823°E		

		T				
			WGS84 Decimal	56°59'39.712N	_	
			Minute	1°17'23.878E		
			WGS84	56.901094° N		
Abandoned Guide Base- well	1	L3xW3xH3.4	Decimal	01.235167° E	Attached to wellhead	
29/02c-11y	1	6 Te	WGS84 Decimal	56°53'59.380N		
			Minute	1°14'7.130E		
			WGS84	57.02403°N	Anchor pile has	
		30 m x 1.83 m	Decimal	01.324213°E	approximately8 m of	
		102 Te	WGS84	57°01′26.508 N	chainin 60% burial,	
		102 10	Decimal	01°19′27.167 E	exposed at the pile	
			Minute		with no trench visible	
			WGS84	57.020906°N	Anchor pile has a	
			Decimal	01.337252°E	chain bundle	
		30 m x 1.83 m	WGS84	57°01′15.2612 N	approximately 10 m	
		102 Te	Decimal		from pile position.	
			Minute	01°20′14.107 E	Chain to pile and pile	
				57.04.4070°N	all in full burial.	
	4	30 m x 1.83 m 102 Te	WGS84	57.014978°N	Anchor pile has a small chain bundle	
			Decimal	01.344138°E	4	
			WGS84	57°00′53.9205 N	approximately 8 m from the pile	
			Decimal		suspected position.	
			Minute	01°20′38.897 E	Chain to pile and pile	
			wiiiute		are all infull burial.	
			WGS84	57.007209°N	ML4 Anchor pile has	
			Decimal	01.343742°E	approximately 4 m of	
STL Mooring				57°00′25.9524 N	chainin 50% burial 4	
piles-		30 m x 1.83 m	WGS84		m from the estimated	
c/w 10 m of		102 Te	Decimal	04 92 0/2 7 4 7 4 5	pile position. The	
moori ng chain			Minute	01°20′37.471 E	chain to pile are all in	
(max.) each					full burial.	
			WGS84	57.004382°N	ML5 Anchor pile is	
			Decimal	01.330464°E	vi s i ble a pproximately	
		[57°00′15.7752 N	30 cm above seabed-	
		24 m x 1.83 m	WGS84		9 m from the pile	
		80 Te	Decimal		there is half a link of	
			Minute	01°19′49.67E	chain exposed-all	
					other chain are in	
			VALCCO 4	F7.00F023°N	burial.	
	3		WGS84	57.005922°N	Anchor pile is not	
		24 m x 1.83 m	Decimal	01.317913°E	visible nor is the	
		80 Te	WGS84 Decimal	57°00′21.319 N	chain- all are in full	
			Minute	01°19′4.487E	burial.	
		 	WGS84	57.01184°N	Anchor pile is	
			Decimal	01.311042°E	protruding	
		24 m x 1.83 m	WGS84	57°00′42.624 N	approximately 30 cm	
		80 Te	Decimal		above seabed- all	
			Minute	01°18′39.751 E	chainis in full burial.	
	1	28 m x 1.83 m	WGS84	57.018689°N	ML8 anchorpile is	
	_	93 Te	Decimal	01.313861°E	exposed protruding	
<u> </u>	<u> </u>	J3 10	DCCIIIIai	U1.J1J0U1 L	Exposed protruding	

	57°01′7.2804 N	approximately20 cm
WGS84 Decimal Minute	01°18′49.9 E	above the seabed- there is approximately 4 m of chain in 20% burial next to the pile.

Table 2.2: Banff and Kyle Subsea Installations-Stabilisation Features								
Stabilisation Feature	Total Number	Total weight (Te) Locations		Exposed/Buried/Condition				
Concrete Mattresses Note 1 (6 m x 3 m x 0.15 m)	110	743	Various locations a cross subsea infrastructure	Latest survey information indicates that all mattresses associated with subsea installations are exposed.				
Grout Bags (25 kg bags) Note 2	1,250	31.25	Various locations across subsea infrastructure	Latest survey information indicates that there is a mixture of some grout bags covered by mattresses and some exposed.				

Notes:

- 1. Concrete mattresses are: 6 m x 3 m x 0.15 m (Approx. mass of each mattress 6.7 Te)
- $2. \quad \text{The quantity of grout bags is an estimate as the as-built data is not explicit.}$

2.2 PIPELINE(S)

Full details will be provided in the PWAV applications.

	Table 2.3: Pipeline/ Flowlines/ Umbilical Information									
Description	crintian Pineline No. Dia Length Description of		Product Conveyed				Pipeline	Current Content		
	(as per PWA)	(in)	(km)	Component Parts	333,32	From	То	Status	Status	
Banff Production P2	PL1546	10"	1.759	Steel / Fl exible	Produced Fluids	Disconnected at B2 Tree	Disconnected at Riser Base	Trenched and Buried	Out of Us e	Sea water / left open ended
Oil Production flexible Jumper	PL1546(J) B5	8"	0.02	Flexible	Produced Fluids	Banff Production Manifold	Disconnected at B5	Surface Laid	Out of Us e	Seawater/left open ended
Banff Production P1	PL1547	10"	1.740	Steel / Flexible	Produced Fluids	Disconnected at Banff Production Manifold	Disconnected at Riser Base	Trenched and Buried	Out of Us e	Sea water / left open ended
Banff Gas Lift / Injection/ Water Injection	PL1548	10"	1.715	Steel/flexible	Processed Gas/ Injection Water	Disconnected at Riser Base	Disconnected at Banff Production Manifold	Surface Laid	Out of Use	Seawater/left open ended
Banff Gas Export	PL1549*	6"	6.578	Steel / Flexible	Processed Gas	Disconnected at API transition spool	Disconnected at CATS tie-in structure	Trenched and Rock Back Filled	Out of Us e	Seawater/left open ended
Banff Gas Export	PL1549A	6"	0.150	Steel	Processed Gas	Disconnected cut end	Disconnected cut end	Surface laid	Out of Use	Seawater/left open ended

(redundant section)										
Banff Oil Export	PL1550	12"	1.920	Steel / Flexible	Processed oil	Disconnected at Tie- in Spool	Disconnected at 12" flexible flowline	Trenched and Buried	Out of Us e	Seawater/left open ended
Banff Oil Export, SAL (redundant section)	PL1550A	12"	0.051	Steel / flexible	Processed oil	Disconnected at PLEM Tee end	SAL	Surface laid	Out of Us e	Seawater/left open ended
Banff	PLU1552	4.75"	1.750	Composite	Methanol	Disconnected at Banff DUTU structure	Disconnected at B5 Tree	Trenched and Buried	Out of Use	Cleaned/Flushed with seawater (there are known blocked cores in this umbilical which will still contain chemical-previously
Chemical Injection umbilical	PLU1553	4.75"	1.625	Composite	Chemicals	Disconnected at Banff DUTU structure	Disconnected at Banff Production Manifold	Trenched and Buried	Out of Us e	Seawater/left open ended
	PLU1554.17	4.75"	1.625	Composite	Chemicals	Disconnected at Banff DUTU structure	Disconnected at Banff Production Manifold	Trenched and Buried	Out of Us e	Seawater/left open ended
Banff Gas Lift / Injection	PL2052**	6"	1.842	Steel	Processed Gas	Disconnected at Gas Injection/ Lift Riser Base	Gas Lift Injection Manifold	Trenched and Buried	Out of Us e	Sea water / left open ended
Banff Gas Lift / Injection	PL2052JB1	2"	0.039	Steel	Processed Gas	Gas lift / injection manifold	Disconnected at B1 tree	Surface Laid	Out of Use	Seawater/left open ended

Banff Gas Lift	PL2052JB3	2"	0.039	Steel	Processed Gas	Gas lift / injection manifold	Disconnected at B3	Surface	Out of	Seawater/left
/ Injection Banff Gas Lift						Gas lift / injection	tree Disconnected at B4	Laid Surface	Use Out of	open ended Seawater/left
/ Injection	PL2052JB4	2"	0.039	Steel	Processed Gas	manifold	tree	Laid	Use	open ended
Banff	PL2053	6"	0.039	Steel	Produced Fluids	Disconnected at B4	Gas Lift/Injection	Surface	Out of	Seawater/left
Production	PL2055	О	0.039	Steel	Produced Fidias	Tree	Manifold	Laid	Use	open ended
Banff	PL2054	6"	0.029	Steel	Produced Fluids	Disconnected at B3	Gas Lift/Injection	Surface	Out of	Seawater/left
Production		Ů	0.023	5100.	- Toddeca Traids	Tree	Manifold	Laid	Use	open ended
Banff	PL2055	10"	0.029	Steel	Produced Fluids	Gas Lift/Injection	Banff Production	Surface	Out of	Seawater/left
Production						Manifold	Manifold	Laid	Use	open ended
Banff Production	PL2056	10"	0.036	Steel	Produced Fluids	Gas Lift/Injection Manifold	Banff Production Manifold	Surface Laid	Out of	Seawater/left
Banff Control						IVIATITIOIU	Gas Lift/Injection	Surface	Use Out of	open ended Seawater/left
Umbilical	PLU4522	3"	1.651	Composite	n/a	Banff DUTU structure	Manifold	Laid	Use	open ended
Banff B1										
control	PL4987	2"	0.039	Composite	Methanol	Gas Lift/Injection	Disconnected at B1	Surface	Out of	Seawater/left
umbilical				·		Manifold	tree	Laid	Use	open ended
Kyle Production	PL1660***	8"	12.023	Steel/Flexible	Produced Fluids	North Kyle Drill Centre Tie-In Tee	Disconnected at Riser Base	Trenched and Buried	Out of Us e	Seawater/left open ended
Kyle Production (redundant section)	PL1660A	8"	0.400	Steel	Produced fluids	Disconnected cut end	Disconnected at Kyle SSIV	Surface Laid	Out of Us e	Sea water / left open ended
Kyle EHC Umbilical	PL1661.1-22	5.4"	12.033	Composite	Various	Disconnected at Riser Base	Disconnected at Well K14	Trenched and Buried	Out of Use	Seawater/left open ended
Kyle K13 Production	PL1797	8"	3.370	Steel	Produced Fluids	Disconnected at productionTree 29/2C-K13	Kyle South 12" Tee Structure	Trenched and Buried	Out of Use	Sea water / left open ended

Kyle 12 Production	PL1798	12"	16.975	Steel	Produced Fluids	Disconnected at Kyle South 12" tee structure	Pipeline flange	Trenched and Buried	Out of Us e	Seawater/left open ended
Kyle 12 Production	PL1798A	12/8"	0.115	Steel	Produced Fluids	Disconnected at production Tree 29/2C-K12z	Kyle South 12" Tee Structure	Surface Laid	Out of Use	Seawater/left open ended
Kyle South EHC umbilical	PL1799.1-19	5.4"	3.548	Composite	Various	Kyl e North SDU/SAM	Kyle South SDU (12" Tee Structure)	Trench and Buried	Out of Us e	Seawater/left open ended
Kyle K13 Umbilical (redundant)	PL1799A	3.85"	0.143	Composite	Various	Kyle North Original SDU/SAM	Disconnected at production Tree 29/2C-K13	Surface Laid	Out of Us e	Seawater/left open ended
Kyle 12 umbilical	PL1800A	4"	0.030	Composite	Various	Kyle South 12" Tee Structure	Disconnected at K12 tree	Surface Laid	Out of Us e	Seawater/left open ended
Kyle K14 Production	PL1887	11"	0.050	Flexible	Produced Fluids	Disconnected at production Tree 29/2C-K14a	Kyle NDC Tee structure	Surface Laid	Out of Use	Seawater/left open ended
Kyle K14 umbilical (redundant)	PLU1888	11"	0.045	Composite	Various	Kyle North Original SDU/SAM	Disconnected at production Tree 29/2C-K14a	Surface Laid	Out of Use	Seawater/left open ended
Kyle K15 Production	PL1952(J)	10.75 "	0.056	Flexible	Produced Fluids	Disconnected at K15 tree	Kyle South 8" Valve Protection Structure	Surface Laid	Out of Us e	Seawater/left open ended
Kyle K15 umbilical	PLU1953(J)	11"	0.075	Composite	Various	Disconnected at K15 tree	Kyle South 12" Tee Structure	Surface Laid	Out of Us e	Seawater/left open ended
Kyle K13 umbilical	PLU2188	11"	0.154	Composite	Various	Disconnected at production Tree 29/2C-K13	Kyle North SDU/SAM	Surface Laid	Out of Us e	Seawater/left open ended
Kyle North chemical umbilical	PL2189	1.4"	0.045	Composite	Chemicals	Kyle North SDU/SAM	Kyle North Tee Structure	Surface Laid	Out of Us e	Seawater/left open ended

Kyle North Gas Lift	PL2387	4"	10.252	Steel	Processed Gas	Banff Gas Lift/ Injection Manifold	Kyle North Drill Centre Gas Lift Choke Manifold	Trenched and Buried	Out of Use	Seawater/left open ended
Kyle North gas lift K13	PL2387JK13	2"	0.060	Steel	Processed Gas	Kyle North Drill Centre Gas Lift Choke Manifold	Disconnected at production Tree 29/2C-K13	Surface Laid	Out of Us e	Sea water/left open ended
Kyle North gas lift K14a	PL2387JK14a	2"	0.058	Steel	Processed Gas	Kyle North Drill Centre Gas Lift Choke Manifold	Disconnected at production Tree 29/2C- K14a	Surface Laid	Out of Use	Seawater/left open ended
Kyle South Gas Lift	PL2388	4"	3.289	Steel	Processed Gas	Kyle North Drill Centre Gas Lift Choke Manifold	Kyle South Drill Centre Gas Lift Choke Manifold	Trenched and Buried	Out of Use	Seawater/left open ended
Kyle South gas lift K12z	PL2388JK12z	2"	0.051	Steel	Processed Gas	Kyle South Drill Centre Gas Lift Choke Manifold	Disconnected at production Tree 29/2C-K12z	Surface Laid	Out of Us e	Seawater/left open ended
Kyle South gas lift K15	PL2388JK15	2"	0.040	Steel	Processed Gas	Kyle South Drill Centre Gas Lift Choke Manifold	Disconnected at production Tree 29/2C-K15	Surface Laid	Out of Us e	Seawater/left open ended
Kyle North K13 control umbilical	PLU2389	11"	0.083	Composite	Hydraulic fluid	Kyle North gas lift choke manifold	Disconnected at production Tree 29/2C-K13	Surface Laid	Out of Use	Seawater/left open ended
Kyle North K14a control umbilical	PLU2390	11"	0.083	Composite	Hydraulicfluid	Kyle North gas lift choke manifold	Disconnected at production Tree 29/2C-K14	Surface Laid	Out of Use	Sea water / left open ended
Kyle North control umbilical	PLU2391	11"	0.127	Composite	Methanol	Kyle North SDU/ SAM	Kyle North gas lift choke manifold	Surface Laid	Out of Us e	Seawater/left open ended

Kyle North K15 control umbilical	PLU2392	11"	0.054	Composite	Hydraulicfluid	Kyle South gas lift choke manifold	Disconnected at production Tree 29/2C-K15	Surface Laid	Out of Use	Sea water / left open ended
Kyle North control umbilical	PLU2393	11"	0.095	Composite	Methanol	Kyle South 12" Tee Structure	Kyle South gas lift choke manifold	Surface Laid	Out of Use	Seawater/left open ended
Kyle North K12z control umbilical	PLU2394	11"	0.086	Composite	Hydraulicfluid	Kyle South gas lift choke manifold	Disconnected at production Tree 29/2C-K12z	Surface Laid	Out of Use	Seawater/left open ended
Kyle North control umbilical	PLU2520	6"	0.150	Composite	Various	Banff gas lift injection manifold	Banff gas lift choke manifold	Surface Laid	Out of Us e	Seawater/left open ended
Banffgas export SSIV umbilical	PLU3106	3"	0.536	Composite	Hydraulic Fluid	Banff DUTU structure	Banff gas export SSIV structure	Surface Laid	Out of Us e	Seawater/left open ended
Kyle South umbilical	PL1800	5.5"	17.30	Composite	Various	Curlew DUTU	Disconnected at Kyle South 12" tee structure	Trench and Buried	Out of Us e	Inhibited water / hydraulic fluid HW540
Kyle ECI umbilical	PLU3117	4"	12.292	Composite	Various	Kyle DUTU SSIV structure	Kyle North SDU/SAM	Trench and Buried	Out of Use	Seawater/left open ended
Banffgas lift/injection SSIV umbilical	PL5074	4"	0.175	Composite	Various	Banff DUTU structure	Gas Lift/Injection SSIV Structure	Surface Laid	Out of Us e	Seawater/left open ended
Banffgas lift/injection SSIV umbilical	PL5075	4"	0.175	Composite	HydraulicJumper	Banff DUTU structure	Gas Lift/Injection SSIV Structure	Surface Laid	Out of Use	Sea water/left open ended
Banffgas lift/injection SSIV umbilical	PLU5076	4"	0.175	Composite	Electrical Jumper	Banff DUTU structure	Gas Lift/Injection SSIV Structure	Surface Laid	Out of Us e	Sea water/left open ended
Banff oil export	PL5073	12"	0.07	Steel	Processed Oil	Disconnected cut end	Disconnected cut end	Surface Laid	Out of Use	Seawater/left open ended

disconnected					
/redundant					
spool					

^{*}Pipeline PL1549 is served by the Gas Export SSIV Structure.

^{***} Pipeline PL1660 is served by the Kyle SSIV Structure.

	Table 2.4: Subsea Pipeline Structures										
Subsea installations including stabilisation features	Number	Size (m)/ Weight (Te)	Lo	ocation	Comments/Status						
			WGS84 Decimal	57.001662°N	Gravity Based.						
		L 10 x W 5.5 x H 3.9	VV G504 Decimal	01.294756°E	Associated with PL1549						
Gas Export SSIV Structure	1	63 Te		57°00′5.9832N	Contents have been flushed.						
		33 .0	WGS84 Decimal Minute	01°17′41.1220 E							
			MCC04 Desired	57.001748°N	Gravity Based						
Banff Gas Lift SSIV /		L 8.7 x W 8.3 x H 3.4	WGS84 Decimal	01.296102°E	0.390 m below mudline						
Injection Structure	1	40 Te		57°00′6.2928N	Associated with PL2052						
injection structure		4016	WGS84 Decimal Minute	01°17′45.9670 E	Contents have been flushed.						
			MCCOA Davissal	57.002870°N	Gravity Based.						
K I converse	4	L 6 x W 7.5 x H 3.2	WGS84 Decimal	01.291173°E	Associated with PL1660						
Kyle SSIV Structure	1	80 Te	MCCCA Dariard Mara	57°00′10.3320 N	Contents have been flushed.						
			WGS84 Decimal Minute	01°17′28.2230E							
			WCCCA Desired	56.914827°N							
Banff to KN Umbilical Wet	1	L 3 x W 1.2 x H 0.8	WGS84 Decimal	01.221441°E	Maight is a pprovimate						
Splice at KN	1	3 Te	WGS84 Decimal Minute	56°54′53.38N	Weight is approximate						
			WG384 Decimal Minute	01°13′17.19E							
			WGS84 Decimal	56.914827°N							
KN to KS Umbilical Wet	1	L 2.6 x W 1.2 x H 0.6	W GS64 Decimal	01.221441°E	Weight is a paravimate						
Splice at KN	1	1.5Te	WGS84 Decimal Minute	56°54′53.40 N	Weight is approximate						
			vv 0384 Decimal withute	01°13′18.41 E							

^{**} Pipeline PL2052 is served by the Banff Gas Lift SSIV/Injection Structure

	Tak	ole 2.5: Banff and Kyle Pi	pelines Stabilisation Features	
Stabilisation Feature	Total Number	Total weight (Te)	Locations	Exposed/Buried/Condition
Concrete Mattresses Note 1 (6 m x 3 m x 0.15 m)	1,230	8,392	Various locations a cross pipeline infrastructure	Latest survey information indicates that there is a mixture of some mattresses that are doubled up, rock placement, shared with other pipelines and multiple overlaps.
Concrete Mattresses Note 2 (6 m x 3 m x 0.3 m)	210	1,798	Various locations a cross pipeline infrastructure	Latest survey information indicates that there is a mixture of some mattresses that are doubled up, rock placement, shared with other pipelines and multiple overlaps.
Grout Bags (25 kg bags) Note 3	12,250	306.25	Various locations across pipeline infrastructure	Latest survey information indicates that there is a mixture of some grout bags covered by mattresses and some exposed.
Rock placement Note 4	N/A	Estimated 8,010	Various locations for spot rock placement and crossings at PL1660	Exposed
Rock placement Note 4	N/A	Estimated 4,830	Banff FPSO 6" Gas Lift / Injection flowline tie-in arrangement (PL2052)	Exposed
Rock placement Note 4	N/A	Estimated 21.8	4" Gas Lift Pipeline (PL2387 & PL2388)	Exposed
Rock placement Note 4	N/A	Estimated 5,000	Various locations a cross pipeline PL1549	Exposed

Notes:

- 1. Concrete mattresses are: 6 m x 3 m x 0.15 m (Approx. mass of each mattress 6.7 Te)
- 2. Concrete mattresses are: 6 m x 3 m x 0.3 m (Approx. mass of each mattress 8.3 Te)
- 3. The quantity of grout bags is an estimate as the as-built data is not explicit.
- 4. All rock placement quantities are estimates based on as-built data sheets.

2.3 BANFF AND KYLE WELLS

Table 2.6: Banff and Kyle Wells Information					
	Subsea Wells				
WONS Name Current Bore	CNR Well Name	Designation	Status	Category of Well	
29/02a-B1	29/02a-B1	Gas Injector	Shut-in	SS 4-0-1	
29/02a-B2	29/02a-B2	Producer	Shut-in	SS 4-0-1	
29/02a-B3Z	29/02a-B3Z	Producer with Gas Lift	Shut-in	SS 3-0-1	
29/02a-B4	29/02a-B4	Producer with Gas Lift	Shut-in	SS 4-0-1	
29/02a-B5X	29/02a-B5X	Producer	Shut-in	SS 3-0-1	
29/02c-12Z	29/02c-K12	Producer	Shut-in	SS 3-0-1	
29/02c-13	29/02c-K13	Producer	Shut-in	SS 3-0-1	
29/02c-14A	29/02c-K14	Producer	Shut-in	SS 3-0-1	
29/02c-15	29/02c-K15	Producer	Shut-in	SS 3-0-1	
29/02a-10	29/02a-10	E&A	Suspended	SS 0-0-1	
29/02a-6z	29/02a-6	E&A	Suspended	SS 0-0-1	
29/02a-7	29/02a-7	E&A	Suspended	SS 0-0-1	
29/02c-11Y	29/02c-11Y	E&A	Suspended	SS 0-0-1	
29/02a-4	29/02a-4	E&A	Abandoned	SS 0-0-0	
29/02c-8z	29/02c-8z	E&A	Abandoned	SS 0-0-0	
29/02c-9	29/02c-9	E&A	Abandoned	SS 0-0-0	
29/02c-14	29/02c-14	E&A	Suspended	SS 0-0-1	
22/27a-1	22/27a-1	E&A	Abandoned	SS 0-0-0	
22/27a-2	22/27a-2	E&A	Abandoned	SS 0-0-0	
22/27a-03Y	22/27a-03Y	E&A	Abandoned	SS 0-0-0	
22/27a-04z	22/27a-04z	E&A	Abandoned	SS 0-0-0	
29/02-1	29/02-1	E&A	Abandoned	SS 0-0-0	
29-02a-2	29-02a-2	E&A	Abandoned	SS 0-0-0	
29/02a-3	29/02a-3	E&A	Abandoned	SS 0-0-0	

Well abandonment categorisation reports have been prepared for the Banff and Kyle wells, in accordance with the OGUK Well Decommissioning Guidelines, Issue 6, June 2018.

2.4 BANFF AND KYLE DRILL CUTTINGS

Table 2.7: Banff and Kyle Drill Cutting Pile Information				
Location of Pile Cent (Latitude/Longitude		Seabed Area (m²)	Estimated Volume of Drill Cuttings (m³)	
Banff Fields		4,886	3,580	
Kyle Fields		4,271	1,432	

The historic drill cuttings pile at Banff is estimated to cover approximately 4,886 m² with an estimated volume of 3,580 m³. It was created as a result of the drilling of nine wells, four of which were drilled using oil based mud (OBM) (wells B1, B2, B3 and B4; ERT, 2008). The Kyle fields historic drill cuttings pile is estimated to cover approximately 4,271 m² with an estimated volume of 1,432 m³. It was created as a result of the drilling of six wells, two of which were drilled using OBM; K12 at the Kyle South drill centre and K13 at the Kyle North drill centre. The drill cuttings are compliant and do not breach the thresholds in the OSPAR Recommendation 2006/5 Guidelines. Therefore the intention is to follow the recommendation in OSPAR 2006/5 and leave the cutting piles undisturbed to degrade naturally.

No significant cuttings mounds were identified from the echosounder and SSS bathymetry results obtained during the Fugro 2020 survey from the 15 wells being drilled in total across the 3 drill centres.

2.5 INVENTORY ESTIMATES

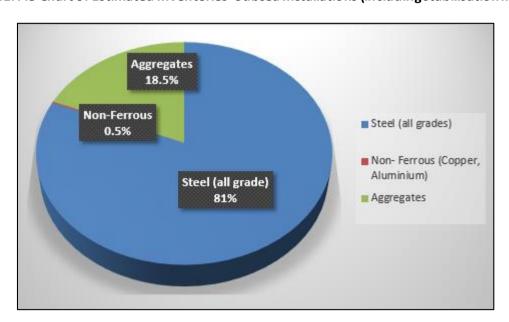
Tables 2.8 and 2.9 provide an estimate of the total weight of materials associated with the Banff and Kyle installations and pipelines. Please refer to the Banff and Kyle Decommissioning Programmes Environmental Appraisal for further details.

A further breakdown of the inventory estimates for the subsea installations and pipeline is provided in Figure 2.1 and Figure 2.3 respectively.

Table 2.8: Inventory of the material associated with Banff and Kyle Installations				
Items Description Weight				
Metals	Steel (all grades)	2,944.44		
	Non-Ferrous (Copper, Aluminium)	9.01		
Concrete	Aggregates (mattresses and grout bags)	774.25		
Plastic	Rubbers, polymers 0			
Hazardous	azardous Residual Fluids (hydrocarbons, chemicals)			
	NORM scale	To be determined		
Other		0		
Total for Banff and Kyle fields 3,727.7				

Table 2.9: Inventory of the material associated with Banff and Kyle Pipelines				
Items Description Weight (tonn				
Metals	Steel (all grades)	3,604.13		
	Non-Ferrous (Copper, Aluminium)	370.37		
Concrete	Aggregates (mattresses and grout bags) 10,496.25			
Plastic	Rubbers, polymers 15.43			
Hazardous	Residual Fluids (hydrocarbons, chemicals)	Trace		
	NORM scale	To be determined		
Other (Glass filament, Silica)		Trace		
Total for Banff and Kyle fields 14,486.18				

Figure 2.1: Pie Chart of Estimated Inventories-Subsea Installations (including stabilisation materials)



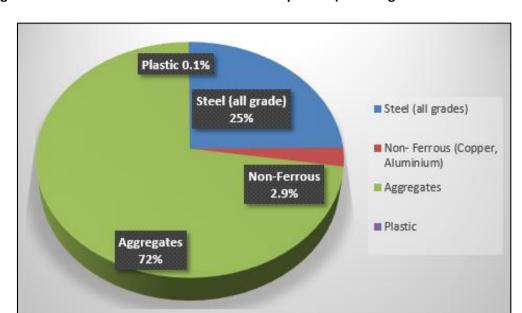


Figure 2.2: Pie Chart of Estimated Inventories-Pipelines (including stabilisation materials)

3. REMOVAL AND DISPOSAL METHODS

Waste will be dealt with in accordance with the Waste Framework Directive. The re-use of any infrastructure, or parts thereof, is first in the order of preferred decommissioning options. Options for re-use of an infrastructure, or parts thereof are currently under investigation. Waste generated during decommissioning will be segregated by type and periodically transported to shore in an auditable manner through licenced waste contractors.

Article 4 of the EU Waste Framework Directive (Directive 2008/98/EC) sets out the five steps to manage waste ranked according to environmental impact (also known as the waste hierarchy). In line with the waste hierarchy, the re-use of an installation (or parts thereof) is first in the order of preferred decommissioning options. CNRI will follow the principles of the waste hierarchy (Figure 3.1) in order to minimise waste production resulting from any removal of subsea infrastructure and pipelines (including stabilisation materials).

Recovered infrastructure will be returned by CNRI to shore and transferred to a suitably licenced decommissioning facility and it is expected that the recovered infrastructure will be cleaned before largely recycled.

Concrete mattresses and grout bags that are recovered, will be cleaned of marine growth if required, and either reused, recovered as aggregate for infrastructure projects or disposed of inlandfill sites.

Appropriately licenced waste management facilities will be identified through a selection process that will ensure that the chosen facilities demonstrate a proven record of waste stream management throughout the deconstruction process, the ability to deliver innovative reuse/ recycling options, and ensure the aims of the waste hierarchy are achieved.

Geographic locations of potential disposal yards may require the consideration of Trans Frontier Shipment of Waste (TFSW), including hazardous materials. Early engagement with the relevant waste regulatory authorities will ensure that any issues with TFSW are addressed before the shipment of any waste.

CNRI will engage with other companies and industries to identify potential reuse opportunities. CNRI recognises that such opportunities are best achieved through the tendering and selection of a waste management contractor with expert knowledge and experience in this area.

Most favoured option lowering the amount Reduce of waste produced Reuse using materials repeatedly using materials to make Recycle new products recovering energy Recovery from waste safe disposal of waste Landfill to landfill Least favoured option

Figure 3.1: Waste Hierarchy

3.1 SUBSEA INSTALLATIONS AND STABILISATION FEATURES

Table 3.1: Subsea Installations and Stabilisations Features				
Subsea Installations and Stabilisation Features	Quantity	Option	Disposal Route (if applicable)	
Subsea Manifold	5	Full recovery as part of decommissioning campaign	Return to shore for reuse, recycling or disposal	
Tee Protection Structure	3	Full recovery as part of	Return to shore for reuse,	
	3	decommissioning campaign	recycling or disposal	
UTA/ DUTU Protection	2	Full recovery as part of	Return to shore for reuse,	
Structure		decommissioning campaign	recycling or disposal	
Riser Base	5	Full recovery as part of decommissioning campaign	Return to shore for reuse, recycling or disposal	
T. II. D	•	Full recovery as part of	Return to shore for reuse,	
Tether Base	4	decommissioning campaign	recycling or disposal	
SDII/SAM structure	2	Full recovery as part of	Return to shore for reuse,	
SDU/SAM structure	2	decommissioning campaign	recycling or disposal	
Suction Base	1	Full recovery as part of decommissioning Campaign- in the event the structure cannot be recovered, further options to decommission the item will be discussed with the Regulator.	Return to shore for reuse, recycling or disposal	
Pipeline End Manifold (PLEM)	1	Full recovery as part of	Return to shore for reuse,	
Tee		decommissioning campaign	recycling or disposal	
Anode Ski ds	8	Full recovery as part of	Return to shore for reuse,	
	_	decommissioning campaign	recycling or disposal	
хт	9	Full recovery as part of	Return to shore for reuse,	
		decommissioning campaign	recycling or disposal	
Gui de Base	5	Full recovery as part of	Return to shore for reuse,	
CTI NA service Dilector		decommissioning campaign	recycling or disposal	
STL Mooring Piles (c/w	8	Partial recovery as part of	Return to shore for reuse,	
moori ng chain)		decommissioning campaign Full recovery as part of	recycling or disposal Return to shore for reuse,	
Tee connector	1	decommissioning campaign	recycling or disposal	
		Full recovery as part of	Return to shore for reuse,	
Concrete Mattresses	1,550	decommissioning campaign	recycling or disposal	
Crout Page	12.750	Full recovery as part of	Return to shore for reuse,	
Grout Bags	13,750	decommissioning campaign	recycling or disposal	

3.2 PIPELINES

Decommissioning Options:

*Key to Options

1) Re-use 2a) Cut and Lift Deburial

2b) Reverse Reel without Deburial2c) Reverse Reel with Deburial2d) Lift and Cut without Deburial2e) Lift and Cut with Deburial

3a) Retrench and Buryentire Line 3b) Rock Placement over Entire Line

4a) Rock Placement over Exposures4b) Trench & Bury Exposures4c) Remove Exposures4d) Accelerated Decomposition

5) Remove Ends & Remediate Snag Risk 6) Leave as-is

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Table 3.2: Pipeline or Pipeline Groups Decommissioning Options				
Pipeline or Group (as per PWA)	Condition of line/ group (Surface laid/ Trenched/ Buried/ Spanning)	Whole or part of pipeline/group	Decommissioning options considered	
Group 1: Rigid Pipelines, Trenched and Buried. PL1546, PL1547, PL1548, PL1550, PL1660, PL1797, PL1798 & PL2388	Trenched and Buried	Whole	2a,4a,4c & 5	
Group 2: Flexible/ Umbilicals, Trenched and Buried PLU2052, PLU1552.1&2, PL1800, PL1661.1-22, PLU1553, PL1554.1-7, PL3117 & PL1799.1-8	Trenched and Buried	Whole	2b, 4a & 5	
Group 3: Flexibles/ Umbilicals, Surface laid PLU4522 & PLU3106	Surface Laid	Whole	Full removal	
Group 4: Rigid Pipelines, Trenched and Rock Covered PL1549 & PL2387	Trenched and Rock Covered	Whole	2a,4a & 5	
Group 5: Spools and Jumpers PL1546, PL1547, PL1550, PLU1552, PLU1553, PLU1554.1-7, PLU4522, PL2052, PL1660, PL1797, PL1548, PL1798, PL1799.1-19, PLU3117, PL2387, PL1550A, PL2388, PL1549A, PL1550A, PL2052JB1, PL2052JB3, PL2052JB4, PL2053, PL2054, PL2055, PL2056, PL4987, PL1660A, PL1798A, PL1880A, PL1799A, PL1887, PLU1888, PL1952(J), PLU1953(J), PLU2188, PL2189, PL2387JK13, PL2387JK14a, PL2388JK12Z, PL2388KJ15, PLU2389, PLU2390, PLU2391, PLU2392, PLU2393, PLU2394, PLU2520, PL1546(J)B5, PL3106, PL5073, PL5074, PL5075 & PLU5076	Surfacelaid	Whole	Full removal	

3.2.1 COMPARATIVE ASSESSMENT METHOD

Comparative Assessment is integral to the overall planning and approval of decommissioning options. CNR's Comparative Assessment process is aligned with the Oil & Gas UK Guidelines for Comparative Assessment in Decommissioning Programmes and OPRED Guidance Notes for the Decommissioning of Offshore Oil and Gas Installations and Pipelines.

CNRI have scoped all of the infrastructure into logical groupings. All feasible decommissioning options for each of the infrastructure groups have been identified, assessed, ranked and screened, utilising the OPRED Guidance Notes: Decommissioning of Offshore Oil and Gas Installations and Pipelines to carry forward credible decommissioning options to be assessed through the Comparative Assessment process.

The Comparative Assessment process uses five assessment criteria, which are; Safety, Environment, Technical, Societal and Economic to compare the relative merits of each credible decommissioning option for each group of infrastructure. The 5 differentiating criteria and associated sub-criteria carry weightings which reflects CNRI's position to prioritise Safety considerations. These weightings have been used on the previous three successful decommissioning projects executed by CNRI.

An independent consultancy utilising its bespoke Multi Criteria Decision Analysis (MCDA) process was employed to facilitate Comparative Assessment workshops. The workshops were attended by specialists from the Operator, Fields Partners and representatives from key stakeholders namely:

- Scottish Fishermen's Federation (SFF);
- Health and Safety Executive;
- OPRED EMT;
- OPRED ODU;
- Dana Petroleum; and
- Premier Oil

At each workshop, each decommissioning option for each infrastructure grouping was assessed against each of the assessment criteria utilising a pairwise comparison system. The relative importance of each of the criteria was assessed in a qualitative way, supported by quantification where appropriate.

The process provides for differentiation between decommissioning options in each infrastructure group taking account of stakeholder views.

Table 3.3: Outcomes of the Comparative Assessment				
Pipeline or Group	Recommendation Option*	Justification		
Group 1: Rigid Pipelines, Trenched and Buried. PL1546, PL1547, PL1548, PL1550, PL1660, PL1797, PL1798 & PL2388	Option 4a- Rock Placement over areas of spans/ exposures/ shallow burial	This results in minimal disturbance to the seabed, lower energy use and reduced risk to personnel. Once decommissioned, the remaining sections of the pipelines can be expected to remain buried and stable throughout their lengths.		
Group 2: Flexible/ Umbilicals, Trenched and Buried PL2052, PL1552.1&2, PL1553, PL1800, PL1661.1-22, PL1554.1-7, PL3117 & PL1799.1-8	Option 4a- Rock Placement over areas of spans/ exposures/ shallow burial	Note: there are no areas of spans or exposures associated with the lines in Group 2. This results in minimal disturbance to the seabed, lower energy use and reduced risk to personnel. Once decommissioned, the remaining sections of the pipelines can be expected to remain buried and stable throughout their lengths.		
Group 3- Flexibles/ Umbilicals, Surface Laid Full removal PLU4522 & PLU3106		Items are surface laid and recoverable.		
Group 4: Rigid Pipelines, Trenched and Rock Covered PL1549 & PL2387	Option 4a- Rock Placement over areas of spans/ exposures/ shallow burial	Note: there are no areas of spans or exposures associated with the lines in Group 4. This results in minimal disturbance to the seabed, lower energy use and reduced risk to personnel. Once decommissioned, the remaining sections of the pipelines can be expected to remain buried and stable throughout their lengths.		

Group 5: Spools and Jumpers PL1546, PL1547, PL1550, PLU1552, PLU1553, PLU1554.1-7, PLU4522, PL2052, PL1660, PL1797, PL1548, PL1798, PL1799.1-19, PLU3117, PL2387, PL154, PL2388, PL1549A, PL1550A, PL2052JB1, PL2052JB3, PL2052JB4, PL2055, PL2056, PL4987, PL1660A, PL1798A, PL1800A, PL1799A, PL1887, PLU1888, PL1952(J), PLU1953(J), PLU2188, PL2387JK14a, PL2387JK13, PL2387JK14a, PL2388JK12Z, PL2388KJ15, PLU2389, PLU2390, PLU2391, PLU2392, PLU2393, PLU2394, PLU2520, PL1546(J)B5, PL3106, PL5073, PL5076	Full removal	Items are surface laid and recoverable.
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Notes:

1- Where buried in deposited rock, remedial work may be required to bury the end of the pipeline where it protrudes out from the rock. As a contingency measure, small deposits of rock may need to be added to the existing rock to make sure that the pipeline ends remain buried.

3.3 PIPELINE STABILISATION FEATURES

	Table 3.4: Pipeline Installations stabilisation Features				
Stabilisation Features	Number	Option	Disposal Route (If Applicable)		
Concrete Mattresses (6 x 3 x 0.15 m)	1,230	Full Removal-it is intended that the mattresses will be recovered to shore, however, in the event of practical difficulties OPRED will be consulted.	Recover and transport ashore for recycling or other waste treatment as appropriate.		
Concrete Mattresses (6 x 3 x 0.30 m)	210	Full Removal-it is intended that the mattresses will be recovered to shore, however, in the event of practical difficulties OPRED will be consulted.	Recover and transport ashore for recycling or other waste treatment as appropriate.		
Grout Bags	12,250 (estimated)	Full removal is intended with an option to reuse on location	Recover and transport ashore for recycling or other waste treatment as appropriate.		
Rock placement (Te)	17,861.8Te	To remainin place.	N/A		

There are a number of concrete mattresses and rock placement associated with the Banff and Kyle pipeline crossings and these have been accounted for in this DP.

3.4 WELLS

Table 3.5: Well Decommissioning

^{*} Recommendation option carried forward from the Comparative Assessment.

The wells for the Banff and Kyle fields covered by this Decommissioning Programmes will be decommissioned, as listed in Section 2.3 (Table 2.6), in a ccordance with Oil & Gas UK Guidelines for the Suspension and Abandonment of Wells, Issue 6, June 2018.

A Well Operations Notification System (WONs) application update will be submitted along with an appropriate Well Intervention Application (WIA) permit, via the UK Energy Portal, in support of each well decommissioning.

3.5 DRILL CUTTINGS

Table 3.6: Banff and Kyle Drill Cuttings Pile				
How many drill cuttings piles are present? Two				
Review of Pile Characteristic	Pile 1- Banff Fields	Pile 2- Kyle Fields		
How has the cuttings pile been screened? Desktop study and Predecommissioning survey	Υ	Υ		
Dates of sampling (if applicable)	2020	2020		
Sampling to be included in pre-decommissioning survey?	Υ	Υ		
Does it fall below both OSPAR thresholds?	Υ	Υ		
Will the drill cuttings pile have to be displaced in order to remove the infrastructure?	N	N		
What quantity (m3) would have to be displaced/removed?	3,580	1,432		
Will the drill cuttings pile have to be displaced in order to remove any pipelines?	N/A	N/A		
What quantity (m3) would have to be displaced/removed?	N/A	N/A		
Have you carried out a Comparative Assessment of options for the Cuttings Pile?	N/A	N/A		

The oil release rate falls below the OSPAR thresholds therefore no comparative assessment was required.

3.6 WASTE STREAMS

The CNRI Waste Management Strategies specify the requirements for the contractor waste management plan. The waste management plan will be developed once contracts have been a warded during the project execution phase. The plans shall adhere to the waste stream licencee conditions and controlled accordingly. Discussion with the regulator will ensure that all relevant permits and consents are in place.

	Table 3.7: Waste Streams Management Methods			
Waste Stream	Removal and Disposal Method (For recovered assets)			
Bulk liquids	Bulk flushing/de-oiling of Banff and Kyle pipelines was covered under the Banff and Kyle Decommissioning Programme for FPSO and FSO Float-off.			
Marine Growth	Some marine growth may be removed offshore. Onshore disposal will be managed by the selected waste management contractor. Marine Growth will also be disposed of according to guidelines.			
NORM/ LSA Scale	Any NORM contaminated material in recovered assets will be returned to shore under the appropriate licence or permit to be disposed of by the selected onshore waste management contractor.			
Asbestos	No As bestos is expected, however if any is found it will be contained and taken onshore for disposal.			
Other Hazardous wastes	Will be recovered onshore and will be managed by the selected waste management contractor/s and disposed of under appropriate permit. The inventory of hazardous materials will identify hazardous materials present and CNRI's risk management processes will be used to prevent spills offshore			

Onshore Dismantling sites

Appropriate licenced contractors and sites will be selected. Facilities selected must demonstrate competence and proven disposal track record and waste stream management & tracea bility throughout the deconstruction process and demonstrate their a bility to deliver innovative recycling options

Table 3.8: Inventory Disposition					
Total Inventory Planned tonnage to shore Planned left <i>in situ</i> (Te)					
Pipelines	14,486.18	11,364.18	3,122		
Subsea Installations	3,727.7	3,061.7	666		

All recovered material will be brought onshore for re-use, recycling or disposal. It is not possible to predict the market for reusable materials with any confidence; so, the figures in Table 3.9 are disposal aspirations.

Table 3.9: Recovered Inventory Reuse, Recycle, Disposal Aspirations			
Reuse Recycle Disposal			
Pipelines	<5%	>95%	<5%
Subsea Installations	<5%	>95%	<5%

Please refer to the Banff and Kyle Environmental Appraisal for further details.

4. ENVIRONMENTAL APPRAISAL

4.1 ENVIRONMENTAL SENSITIVITIES (SUMMARY)

	Table 4.1: Environmental Sensitivities
Environmental Receptor	Main Feature
Conservation interests	Banff and Kyle fields are located partly within the conservation site, the East of Gannet and Montrose Fields MPA. Approximately 10 km due North of the Kyle Fields. This conservation site has been designated for the protection of ocean quahog habitat and aggregations. No living specimens of <i>A. islandica</i> , or infaunal siphons were observed during site specific environmental survey data at the Banff and Kyle fields. There was no evidence of any Annex I protected features in the area. Seapens and burrowing mega fauna habitat was present within both the Banff and Kyle fields. According to the SACFOR classification, the seapen P. phosphorea ranged from 'occasional' to 'common' during the Banff survey. V. mirabilis was 'frequent' at one station and 'absent' at all others. Faunal burrows between 3-15 cm were either 'frequent' or 'common' at the four sites where they were present (Fugro, 2020a). Faunal burrows sized 3-15 cm were considered either 'common' or 'frequent' at all Kyle North sites. At Kyle South the SACFOR classification of faunal burrows was 'common' at all but one site which was considered 'abundant'. Burrows >15 cm were 'absent' at all stations and 'frequent' along both visual transects (Fugro, 2020b).
Seabed Habitats and Fauna	The water depths across Banff and Kyle are between 90-95 m. The Banff Fields is located partly within A5.27 'Deep circalittoral sand', and also within an area of A5.37 'Deep circalittoral mud'. The Kyle Fields is almost exclusively located within A5.37 'Deep circalittoral mud'. Directly to the south of the Banff Fields is a small patch of A5.15 'Deep circalittoral coarse sediment' (EMODnet, 2019). Side-scan sonar (SSS) data revealed regions of seabed which had higher sonar reflectivity corresponded with regions of A5.44 'Circalittoral mixed sediment' in the Banff Fields (Fugro, 2020a). Benthic fauna was much the same between the Banff and Kyle fields. The dominant taxa observed within both the sandy and mixed substrate at the Banff Fields, were sea pens (<i>Pennatula phosphorea</i>), hermit crabs (Paguridae) and anemones (Actiniaria including <i>Hormathiidae</i> and <i>Epizoanthus papillosus</i>) (Fugro, 2020a). Sea urchins (<i>Gracilechinus acutus</i>) were additionally amongst the dominant species within the Kyle Fields (Fugro, 2020b). Bioturbation was evident across both survey areas (Fugro 2020a, 2020b). Seapens and burrowing megafauna communities were present within both the Banff and Kyle fields. According to the SACFOR classification, the seapen <i>P. phosphorea</i> ranged from 'occasional' to 'common' during the Banff survey. <i>V. mirabilis</i> was 'frequent' at one station and 'absent' at all others. Faunal burrows between 3-15 cm were either 'frequent' or 'common' at the four sites where they were present (Fugro, 2020a).Faunal burrows sized 3-15 cm were considered either 'common' or 'frequent' at all Kyle North sites. At Kyle South the SACFOR classification of faunal burrows was 'common' at all but one site which was considered 'abundant'. Burrows >15 cm were 'absent' at all stations and 'frequent' along both visual transects taken from the site specific survey done at Banff and Kyle.

Fish	Banff and Kyle fields are located within the nursery grounds in the vicinity of the project area: anglerfish (<i>Lophius piscatorius</i>), blue whiting (<i>Micromesistius poutassou</i>), cod, European hake (<i>Merluccinus merluccinus</i>), haddock (<i>Melanogrammus aeglefinus</i>), herring (<i>Clupea harengus</i>), ling (<i>Molva molva</i>), mackerel, Norway pout, plaice (<i>Pleuronectes platessa</i>), sandeel, spurdog (<i>Squalus acanthias</i>) and whiting (<i>Merlangius merlangus</i>) (Coull <i>et al.</i> , 1998; Ellis <i>et al.</i> , 2012). Fisheries sensitivity maps indicate that the probability of significant aggregations of juveniles of these species in the project area is low (Ellis <i>et al.</i> , 2012). Aires <i>et al.</i> (2014) provides modelled spatial representations of the predicted distribution of 0 age group fish. The modelling indicates the presence of juvenile fish (less than one year old) for multiple species: anglerfish, blue whiting, European hake, haddock, herring, mackerel, horse mackerel (<i>Trachurus trachurus</i>), Norway pout, plaice, sprat (<i>Sprattus sprattus</i>), and whiting. Across the project area, the probability of juvenile fish aggregations occurring is low for all species (<0.15).
Marine Mammals	Harbour porpoise (<i>Phocoena phocoena</i>), short beaked common dolphin (<i>Delphinus delphis</i>), white-beaked dolphin (<i>Lagenorhynchus albirostris</i>), Atlantic white-sided dolphin (<i>Lagenorhynchus acutus</i>) and minke whale (<i>Balaenoptera acutorostrata</i>) are known to be visitors to the waters surrounding the project area (Reid <i>et al.</i> , 2003; Hammond <i>et al.</i> , 2017). Seal densities are very low across the Banff and Kyle area due to its distance from shore (Russell <i>et al.</i> , 2017 and Marine Scotland, 2017).
Seabirds	According to the density maps provided in Kober et al. (2010), the following species could be found within the Banff and Kyle fields area: northern fulmar (Fulmarus glacialis), Manx shearwater (Puffinus puffinus), European storm-petrel (Hydrobates pelagicus), northern gannet (Morus bassanus), Arctic skua (Stercorarius parasiticus), great skua (Stercorarius skua), black-legged kitti wake (Rissa tridactyla), great black-backed gull (Larus marinus), common gull (Larus canus), lesser blackbacked gull (Larus fuscus), herring gull (Larus argentatus), Arctic tern (Sterna paradisaea), common guillemot (Uria aalge), razorbill (Alca torda), little auk (Alle alle), Atlantic puffin (Fratercula arctica) and pomarine skua (Stercorarius pomarinus). Seabird Oil Sensitivity Index (SOSI) identifies areas at sea where seabirds are likely to be most sensitive to surface pollution (Webb et al., 2016). Seabird vulnerability in Blocks 22/27, 29/2 and 29/7 is low throughout the year with no data for November. Block 29/11 experiences a Very High SOSI value in the months of September and October (Webb et al., 2016). The risk of an oil spill from the proposed operations in the project area is considered remote and therefore the overall risk to birds is considered negligible.
Commercial Fisheries	The Banff and Kyle fields lie in the International Council for the Exploration of the Seas (ICES) Rectangles 42F1 and 43F1 (Scottish Government, 2020). ICES rectangle 42F1 has predominantly been targeted for shellfishin recent years, whilst the adjacent ICES rectangle 43F1 ex periences a much greater amount of demersal fishing. The total annual landings for the Banff and Kyle Area (ICES rectangles 42F1 and 43F1) were ≤1% of the total landings within the UKCS for each of the five most recent fishing years (Scottish Government, 2020). Overall effort was low for 42F1. In the years preceding 2018, fishing effort has traditionally been higher during the summer months (Scottish Government, 2020).

	Comparatively, fishing effort in ICES rectangle 43F1 is much lower. In 2019, effort was highest in January (only 6 days), accounting for 21% of the total number of days fished, with the other disclosive months contributing for the remaining fishing effort. In total there were 28 days of fishing effort in 2019 in 43F1 which is very low (Scottish Government, 2020). Both in 2018 and consistently in past years fishing effort has been greater in rectangle 42F1 compared to 43F1.
	Trawls were the most utilised gear in rectangle 42F1 and 43F1. Trawls contributed between 86% and 99% of the total fishing effort in rectangles 43F1 and 42F1 respectively (Scottish Government, 2020). Vessel Monitoring System (VMS) data indicates that <i>Nephrops</i> fishing occurs in hotspots to the east of Banff and Kyle ($<1\mathrm{km}$ away), and southwest of Kyle ($<10\mathrm{km}$ away). To the southwest of Kyle ($<10\mathrm{km}$ away) is an area of pelagic fishing targeting herring (NMPi, 2020).
Other Users of the Sea	Across the Banff and Kyle area, sea users other than commercial fisheries mainly relate to offshore oil and gas. The Banff and Kyle fields are in a reas of either low or very low shipping intensity (Oil and Gas Authority, 2016). The Banff and Kyle fields are in a mature area of the CNS with extensive oil and gas development.
Atmosphere	The majority of atmospheric emissions for the decommissioning of Banffand Kyle relate to vessel use or are associated with the recycling of material returned to shore. The estimated CO ² emissions to be generated by the selected decommissioning options will be approximately 6,652 Te. This equates to 0.08% of the total UKCS vessel emissions, excluding fishing vessels, in 2017 (7,800,000 Te; BEIS, 2019). Furthermore, in line with the OGA's (2021) expectations, CNRI are dedicated to the reduction of greenhouse gas emissions from all decommissioning operations, as far as is reasonable for each project.'
Onshore Communities	Was te generated during decommissioning will be transported to shore in an auditable manner through licenced was te contractors, as managed under Banff and Kyle's was te management plan (WMP). Was tes will be treated using the principles of the was te hierarchy, as defined in the WMP, focusing on the reuse and recycling of was tes where possible. Raw materials will be returned to shore with the expectation to recycle the majority of the returned material. There may be instances where infrastructure returned to shore is contaminated (e.g. by NORM, hazardous, and/or special was tes) and cannot be recycled. In these instances, the materials will require disposal. However, the weight and/or volume of such material is not expected to result in substantial landfill use.

4.2 POTENTIAL ENVIRONMENTAL IMPACTS AND THEIR MANAGEMENT

ENVIRONMENTAL APPRAISAL SUMMARY

The EA addresses potential environmental and societal impacts by characterising the likelihood and significance of interactions between the proposed decommissioning activities and the local environment, whilst considering stakeholder response. The EA also details mitigation measures designed to abate potential impacts in accordance with CNRI's Environmental Management System (EMS) and Health, Safety, Environment and Security (HSES) Policy. Key potential environmental and societal impacts which were considered to be 'potentially significant', and thus requiring further assessment, were identified through an environmental issues identification (ENVID) workshop, they include: seabed impacts and physical presence of infrastructure left in situ. These potential impacts have undergone detailed assessment within the EA. The following environmental and societal impacts were screened out from further assessment due to existing controls limiting the likelihood of potential significant impacts: impacts to water quality; emissions to air; vessel presence; underwater noise emissions; resource use; onshore activities; waste; and unplanned events. The justifications for screening out these impact pathways are detailed in the accompanying EA.

In line with the OGA's (2021) expectations, CNRI are dedicated to the reduction of greenhouse gas emissions from all decommissioning operations, as far as is reasonable for each project.

The EA concludes that the recommended options to decommission the Banff and Kyle's infrastructure can be completed without causing significant impact to environmental or societal receptors.

Overview in Table 4.2.

	Table 4.2: Environmental Impact Management		
Activity	Main Impacts	Management	
Subsea Installations removal	Seabed impacts from: • Excavation of buried infrastructure and stabilisation materials; • Removal of grout bags and stabilisation materials; • Recovery of infrastructure; and • Cutting of piles below the seabed. Impacts to commercial fisheries from project activities excluding access to fishing grounds.	Reasonable efforts will be made so that vessel use will be optimised/minimised by CNRI for these decommissioning activities and managed in accordance with agreed vessel management procedures, including a vessel work programme. The 500 m subsea safety exclusion zones will remain in operation during these decommissioning activities reducing risk of non-project related vessels entering into the area where these decommissioning activities are taking place. There are cardinal buoys currently marking the now decommissioned FPSO and FSO area. The safety exclusion zones will be revised following the completion of the relevant decommissioning activities enabling fisheries to regain access to grounds. Fishing activities have the potential to increase in the area once the 500 m safety zones surrounding the existing substructures are re-assessed. Use of established contractors with appropriate capability, licences and maintenance procedures will be selected and audited. Other sea users will be notified in advance of activities occurring The infrastructure is currently shown on Admiralty Charts and the FishSafe system. When decommissioning activity has been completed, updated information will be made available to update Admiralty Charts and the FishSafe system. All pipeline routes and installation sites will be the subject of oilfields debris clearance and as-left verification surveys when decommissioning activity has concluded. Cardinal Buoys are in the fields and markall of the subsea hazards that are not over trawlable. These will remain until the installations have been decommissioned.	
Decommissioning Rigid Pipelines and flexibles/ umbilicals- trenched and buried/ rock covered (including Stabilisation Features)	Seabed impacts from decommissioning of pipelines, with rock placement over spans:	Reasonable efforts will be made so that vessel use will be optimised/minimised by CNRI for these decommissioning activities and managed in accordance with a greed vessel management procedures, including a vessel work programme. The 500 m subseas afety exclusion zones will remain in operation during these decommissioning activities reducing risk of non-project related vessels entering into the area where these decommissioning activities are taking place. There are cardinal buoys currently marking the now decommissioned FPSO and FSO area. The safety exclusion zones will be revised following the completion of the relevant decommissioning activities enabling fisheries to regain access to grounds. Fishing activities have the potential to increase in the area once the 500 m safety zones surrounding the existing substructures are re-assessed.	

		Use of established contractors with appropriate capability, licences and maintenance
		procedures will be selected and audited. Other sea users will be notified in advance of
		activities occurring.
		The infrastructure is currently shown on Admiralty Charts and the FishSafe system. When
		decommissioning activity has been completed, updated information will be made available
		to update Admiralty Charts and the FishSafe system. All pipeline routes and installation
		sites will be the subject of oilfields debris clearance and as-left verification surveys when
		decommissioning activity has concluded.
		Operations will be conducted as carefully as possible to minimise sediment disturbance,
		avoiding dragging of items on the seabed where possible.
		Rock placement will be carefully managed, e.g. through use of an ROV to limit the areas
		covered (reducing unnecessary spreading) and depth of coverage to that required to
		ensure no snagging hazards remain.
		Any snagging risk to other users of the sea will be minimised by continual monitoring of
		degrading structures or free spans (type and frequency to be determined through a risk-
		based approach but will be agreed with OPRED).
		Reasonable efforts will be made so that vessel use will be optimised/minimised by CNRI for
	_	these decommissioning activities and managed in accordance with a greed vessel
	Seabed impacts from:	management procedures, including a vessel work programme.
	Removal of surface laid flexible	The 500 m subsea safety exclusion zones will remain in operation during these
	flowlines, umbilicals, jumpers and	decommissioning activities reducing risk of non-project related vessels entering into the
	rigid spool pieces;	area where these decommissioning activities are taking place. There are cardinal buoys
	 Reverse-reeling of buried flexible 	currently marking the now decommissioned FPSO and FSO area. The safety exclusion
	umbilical;	zones will be revised following the completion of the relevant decommissioning activities
Decommissioning of surface	 Removal of stabilisation features; 	enabling fisheries to regain access to grounds. Fishing activities have the potential to
laid spools, jumpers and	and	increase in the area once the 500 m safety zones surrounding the existing substructures
flexible umbilical.	 Clear seabed verification which 	are re-assessed.
	may require direct intervention	Use of established contractors with appropriate capability, licences and maintenance
	(e.g. overtrawling)	procedures will be selected and audited. Othersea users will be notified in advance of
		activities occurring.
	Impacts to commercial fisheries from	The infrastructure is currently shown on Admiralty Charts and the FishSafe system. When
	project activities excluding access to	decommissioning activity has been completed, updated information will be made available
	fishinggrounds.	to update Admiralty Charts and FishSafe system. All pipeline routes and installation sites
		will be the subject of oilfields debris clearance and as-left verification surveys when
		decommissioning activity has concluded.

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	Operations will be conducted as carefully as possible to minimise sediment disturbance, avoiding dragging of items on the seabed where possible.

5. INTERESTED PARTY CONSULTATIONS

Consultations Summary:

The following key stakeholders have been identified with whom to engage regarding these decommissioning activities and schedule relating to the subsea installation, pipelines (spools and jumpers) and pipeline structures removal:

- Adjacent pipelines operator Shell U.K. Limited
- Banff Fields Partners CNRI, Dana Petroleum (E&P) Limited
- CATS system stakeholders CATS North Sea Limited, Ithaca Energy, Total E&P UK
- Global Marine Group (GMG)
- Health and Safety Executive (HSE)
- Joint Nature Conservation Committee (JNCC)
- Kyle Fields Partners CNRI, Premier Oil UK Limited, Dana Petroleum (BVUK) Limited
- Maritime and Coastguard Agency (MCA)
- Marine Scotland (MS)
- Northern Lighthouse Board (NLB)
- OPRED Offs hore Decommissioning Unit (ODU)
- OPRED Environmental Management Team (EMT)
- OPRED Offshore Environmental Inspectorate (OEI)
- Oil & Gas Authority (OGA)
- Scottish Fishermen's Federation (SFF)
- Scottish Environment Protection Agency (SEPA)
- United Kingdom Hydrographic Office (UKHO)

Statutory and public consultations were carried out between 7th June 2021 to 7th July 2021.

Copies of the Decommissioning Programmes were made available on request and as a download from the BEIS website: https://www.gov.uk/guidance/oil-and-gas-decommissioning-of-offshore-installations-and-pipelines

A public notice was published in The Times and Aberdeen Press and Journal newspapers on the 7th June 2021. Please refer to Appendix A for a copy of the public notice. The public notice gave instructions for representations to be made in writing by 7th July 2021. Where stakeholder comments required a CNRI response, these are outlined in Table 5.1.

Table 5.1: Summary of stakeholder comments		
Stakeholder	Comment	Response
Informal Cons	ultation	
Partners	Pre-DRAFT DP issued for Review Pre-DRAFT EA issued for Review Pre-DRAFT CA issued for Review	Minor comments incorporated
TPFP	Pre-DRAFT DP issued for Review Pre-DRAFT EA issued for Review Pre-DRAFT CA issued for Review	Minor comments incorporated
ODU	EIA Scoping Letter Pre-DRAFT DP Issued for Review Pre-DRAFT EA Issued for Review Pre-DRAFT CA Issued for Review	No Response
OPRED (BEIS EMT)	EIA Scoping Letter Pre-DRAFT EA Issued for Review	No Response
JNCC	EIA Scoping Letter (issued 26.05.21) Meeting held on the 06.05.21	No Response <u>Discussion points</u> : CA recommendations, Anchor and Mooring line depressions, SAL anchor, worst case rock

Table 5.1: Summary of stakeholder comments		
Stakeholder	Comment	Response
Informal Consu	ıltation	
		placement figures in the EA and the decision tree process. Main Outcomes: JNCC provided minor comments on rock placement and areas of clarification. Highlighted preference to reduce hard substrate in the area and
		avoid further disturbance to the seabed.
Scottish Fishing Federation (SFF)	EIA Scoping Letter Meeting held on the 27.04.21	No Response <u>Discussion points</u> : CA recommendations, Anchor and Mooring line depressions, SAL anchor and decision trees. <u>Main Outcomes</u> : SFF mentioned previous experience on other projects with snagging on depressions; SFF acknowledged the data CNRI had provided on depressions was sufficient enoughfor them to not do a first pass trial trawl over them, as they are deemed too large and steep to not be considered a snagging issue; SFF referred to the boulders as not being an additional risk, as boulders are common in that area (particularly in the Banff and Kyle area). Fishermen in that expect to encounter boulders; SFF made reference to filling with rock 1 m below the seabed for the depressions would still be considered a risk; SFF referred to any rock cover needing to be the appropriate profile, to ensure it is over trawlable.
National Federation of Fishermen's Organisation (NFFO)	EIA Scoping Letter	No Response
Global Marine Systems (GMS)	EIA Scoping Letter	No Response
Northern Irish Fish Producers Organisation (NIFPO)	EIA Scoping Letter	No Response
SEPA	EIA Scoping Letter	No Response
stakeholders w assessment wo including SFF, (ged with interested parties and who participated in the comparative orkshop, held on the 17 th November 2020, DPRED EMT, OPRED ODU, HSE and Partners and Dana Petroleum).	N/A

CNRI have and will continue to engage with the stakeholders regarding overall decommissioning plans and in particular, the plans under this Decommissioning Programme Arrangements.

6. PROGRAMME MANAGEMENT

6.1 PROGRAMME MANAGEMENT AND VERIFICATION

The Banff and Kyle fields decommissioning activities will be managed by CNRI. Standard procedures for operational control and hazard identification and management will be used. The respective Project Management teams will monitor and track the process of consents and the consultations required as part of this process. Any changes in detail to the offshore removal programme will be controlled by a Management of Change processes and discussed and agreed with OPRED.

6.2 POST DECOMMISSIONING DEBRIS CLEARANCE AND VERIFICATION

A post decommissioning site survey will be carried out by CNRI, to verify their respective decommissioning activities have been completed and will confirm overall completion of the Decommissioning Programme. Oil and gas related seabed debris identified during the survey will be recovered for onshore disposal or recycling. This will be carried out across the designated 500 m safety zones of installation sites and a 100 m corridor along each existing pipeline route (50 m either side).

The clear seabed will be validated either by an independent seabed verification trawl over the installation sites and each existing pipeline route, or by non over-trawl techniques such as Side Scan Sonar (SSS)/ ROV or by autonomous underwater vehicle (AUV). The most appropriate validation method(s) will be discussed and agreed with OPRED nearer the time this activity is due to take place.

6.3 SCHEDULE

The high level Gantt chart Figure 6.1 provides the overall schedule for the Banff and Kyle fields programme of decommissioning activities. The activities are subject to the acceptance of the Decommissioning Programme presented in this document and any unavoidable constraints (e.g vessel availability) that may be encountered while executing the decommissioning activities. Therefore, activity schedule windows have been included to account for this uncertainty.

The commencement of offshore decommissioning activities will depend on commercial agreements and commitments. CNRI will examine the possibility of including the offshore work in a wider campaign of subsea works to reduce costs.



Figure 6.1 Banff and Kyle Project Schedule

6.4 COSTS

An overall cost estimate following UK Oil & Gas (OGUK) Guidelines on Decommissioning Cost Estimation (Issue 3, October 2012) will be provided to OPRED.

6.5 CLOSE OUT

In accordance with OPRED Guideline Notes, a Close Out Report will be submitted to OPRED explaining any variations from the DP. This is normally within 12 months of completion of the offshore decommissioning scope. The Close Out Report will be posted on the CNRI website reconciling any variations from the Decommissioning Programme. This includes debris removal and, where applicable independent verification of seabed clearance, and the first post-decommissioning environmental survey.

6.6 POST- DECOMMISSIONING MONITORING AND EVALUATION

The frequency of future surveys and the requirements for legacy and liability management will be described in the Close Out Report and agreed with OPRED. The approach will be supported with a risk based assessment.

It is proposed that residual liability for individual pipelines remaining *in situ* following the decommissioning works associated with these Decommissioning Programmes will remain with the respective Operators and Banff and Kyle Section 29 holders identified in Section 1.4. Unless agreed otherwise in advance with OPRED, CNRI will remain the focal point for such matters, such as any change in ownership, for example.

All pipeline routes and installation sites will be the subject of oilfields debris clearance and as-left verification surveys when decommissioning activity has concluded. The main risk from infrastructure remaining in situ is the potential for interaction with other users of the sea, specifically from fishing related activities. Where the infrastructure is trenched below seabed level or trenched & buried below seabed, the effect of interaction with other users of the sea is considered to be negligible.

The infrastructure is currently shown on Admiralty Charts and the FishSafe system. When decommissioning activity has been completed, updated information will be made available to update Admiralty Charts, FishSafe and OGA Infrastructure data systems.

A post-decommissioning environmental seabed survey, centred around the well locations will be carried out. The survey will focus on chemical, physical and biological changes, disturbances and will be compared with the pre decommissioning survey. Results of this survey will be available once the work is complete, with a copy forwarded to OPRED.

When decommissioning activities have been completed, and where applicable, the safety zones around offshore infrastructure will be removed.

The licence holders recognise their commitment to undertake post-decommissioning monitoring of infrastructure left in situ. After the post-decommissioning survey reports have been submitted to OPRED and reviewed, a post-decommissioning monitoring survey regime, scope and frequency, will be agreed with OPRED. The requirement for legacy and liability management will be described in more detail in the Close Out Report.

7. SUPPORTING DOCUMENTS

Table 7.1: Supporting Documents		
Document Number	Title	
P0009-CNR-EN-REP-00015	Banff and Kyle Decommissioning Environmental Appraisal	
P0009-CNR-EN-REP-00006	Banff and Kyle Comparative As sessment Report	

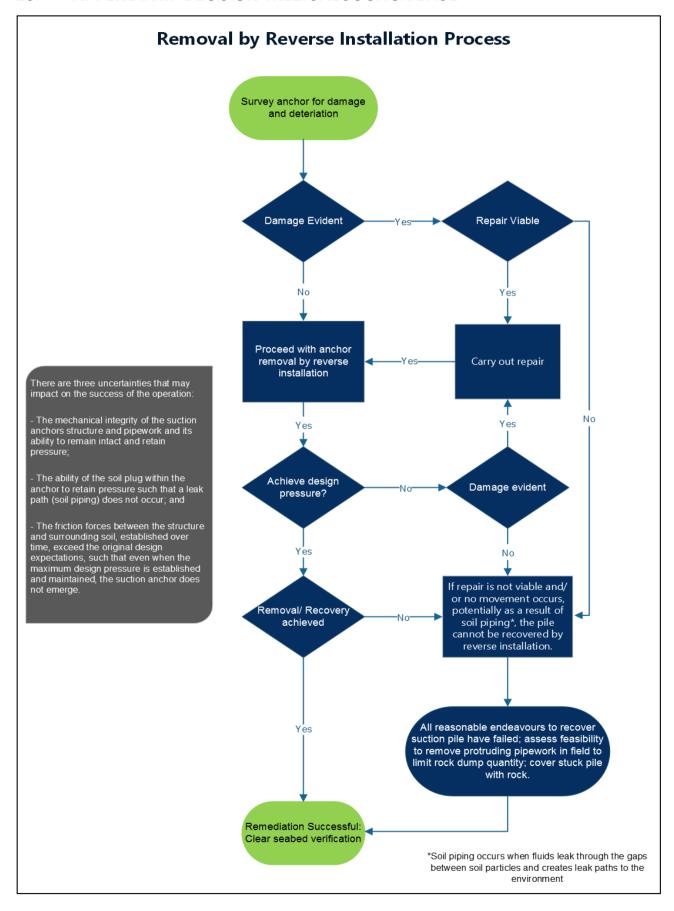
8. APPENDIX I- PARTNER LETTERS OF SUPPORT

To be included post consultation

9. APPENDIX II- COPIES OF THE PUBLIC NOTICE AND CORRESPONDENCE

To be included post consultation

10. APPENDIX III- DECISION TREE: SALSUCTION BASE



11. APPENDIX IV- DECISION TREE: ANCHOR AND MOORING LINE DEPRESSIONS

