



Project Title

## NEVIS N11 WELLHEAD PROTECTION STRUCTURE DECOMMISSIONING

Document Title

## DECOMMISSIONING PROGRAMME – NEVIS N11 WHPS


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## REVISION DETAILS


Revision	Description of Changes
R01	First Draft
R02	Re-issued with OPRED comments incorporated
R03	Marine license reference updated, Statutory and Public Consultee details added
R04	Final version issued including Partner Letter of Support and Public Notice

## ABBREVIATIONS AND ACRONYMS

Acronym	Definition
BEIS	Department for Business, Energy and Industrial Strategy
km	Kilometer
m	Meter
N/A	Not Applicable
OGA	Oil & Gas Authority
OPRED	Offshore Petroleum Regulator for Environment & Decommissioning
OSPAR	Oslo-Paris Convention
P&A	Plug & Abandon
RAT	Riser Access Tower
SCAP	Supply Chain Action Plan
Te	Tonne
UK	United Kingdom
UKCS	United Kingdom Continental Shelf
WGS84	World Geodetic System 1984
WHPS	Wellhead Protection Structure


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## 1 EXECUTIVE SUMMARY

### 1.1 Decommissioning Programme

This document contains the decommissioning programme for the removal of the Nevis South Field Subsea Wellhead Protection Structure (WHPS) on well N11 in block 9/13a. The decommissioning of the WHPS is being treated as a standalone project as part of the Garten installation campaign. The pipelines and stabilisation materials are not being decommissioned at this time.

### 1.2 Requirement for Decommissioning Programme(s)

#### Installation(s):

In accordance with the Petroleum Act 1998, the Section 29 notice holders of the Nevis South field (see Table 1.2) are applying to the Department of Business, Energy and Industrial Strategy to obtain approval for decommissioning the installations detailed in Section 2 of this programme. (See also Section 8 - Partner Letter(s) of Support).

In conjunction with public, stakeholder and regulatory consultation, the decommissioning programme is submitted in compliance with national and international regulations and BEIS guidelines. The schedule outlined in this document is for a 9-month decommissioning project planned to begin in April 2019, however, the actual decommissioning of the WHPS is expected to take less than one day. The schedule has been set until the end of the year as there are several campaigns planned throughout the year, the first mobilising in April 2019, and the WHPS removal will be included in one of these campaigns. It will not be removed as a standalone decommissioning project.


### 1.3 Introduction

The Nevis N11 protection structure is located to the west of the Beryl Alpha Platform within the Nevis South Drill Centre in ~105m water depth. In order to facilitate well intervention activity (UKCS block 9/13a), the protection structure from well N11 was removed from the suspended well and wet-stored in a pre-defined location. The decommissioning of the WHPS is being treated as a standalone project as part of the Garten installation campaign. The pipelines and stabilisation materials are not being decommissioned at this time.

Well P&A Activities were completed on the 24<sup>th</sup> April 2018.

The structure wet-store operations were carried out using the Seven Falcon vessel in March 2018.

This decommissioning programme explains the principles of the removal activities that will be undertaken, along with a summary of environmental impacts which have been included in the relevant permit applications.

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## 1.4 Overview of Installation(s) Being Decommissioned

### 1.4.1 Installation(s)

Table 1.1: Installation(s) being Decommissioned			
Field(s):	Nevis South	Production Type: (Oil / Gas / Condensate)	Oil
Water Depth (m)	~105m	UKCS Block	9/13a
Surface Installation(s)			
Number	Type	Topside Weight (te)	Jacket Weight (te)
N/A	N/A	N/A	N/A
Subsea Installation(s)		Number of Wells	
Number	Type	Platform	Subsea
1	WHPS	N/A	1*
Drill Cuttings Pile(s)		Distance to median	Distance from nearest UK coastline
Number of Piles	Total Estimated Volume (m <sup>3</sup> )	km	km
N/A	N/A	24 km	151 km

\* Well has already been plugged and abandoned, wellhead has been removed and top of conductor cut.


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Table 1.2: Installation(s) Section 29 Notice Holders Details		
Section 29 Notice Holder(s)	Registration Number	Equity Interest (%)
Apache Beryl I Limited	BR001327	57.18%
Chrysaor Limited	06418649	42.81%
Beryl North Sea Limited	BR015691	0%
Enterprise Oil Limited	01682048	0%
Hess Limited	00807346	0%
Siccar Point Energy E&P Limited	01504603	0%

### 1.5 Summary of Proposed Decommissioning Programme(s)

Table 1.3: Summary of Decommissioning Programme(s)		
Selected Option	Reason for Selection	Proposed Decommissioning Solution
<b>1. Subsea Installation(s)</b>		
N11 WHPS will be removed.	To remove all seabed structures and leave a clear seabed. To comply with OSPAR 98/3 requirements.	Complete removal of the WHPS from the seabed.
<b>2. Pipelines, Flowlines and Umbilicals</b>		
Leave in-situ for future decommissioning.	To be considered as part of wider field decommissioning.	N/A
<b>3. Wells</b>		
N11 well has been plugged and abandoned, wellhead has been removed and top of conductor cut.	To meet industry requirements in the safe decommissioning of wells.	Well plugged and abandoned, wellhead recovered & 3m of top of conductor cut and removed. *
<b>4. Drill Cuttings</b>		
N/A	N/A	N/A
<b>5. Interdependencies</b>		
<p>The pipelines have been flushed and cleaned before being disconnected from the wellhead to allow its removal but otherwise they will be left intact until future Apache related decommissioning activities.</p> <p>Pipelines are partially covered via stitch mattresses and have a small number of grout bags local to the pipeline end, acting as a platform for the end-fitting to rest on.</p>		

\* Well P&A activities have already been completed and well details are included for reference only

## 1.6 Field Location Including Field Layout and Adjacent Facilities

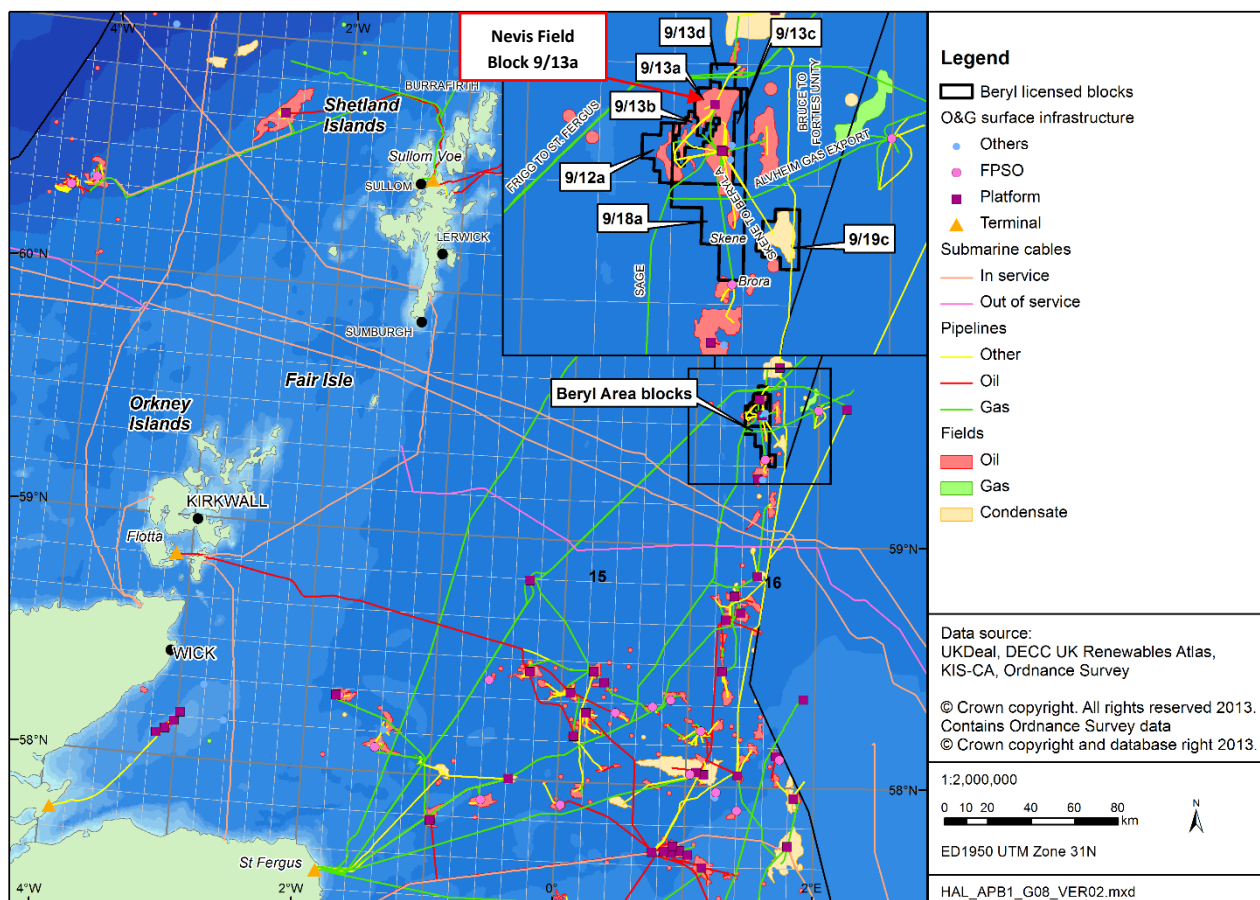


Figure 1.1: Field Location in UKCS



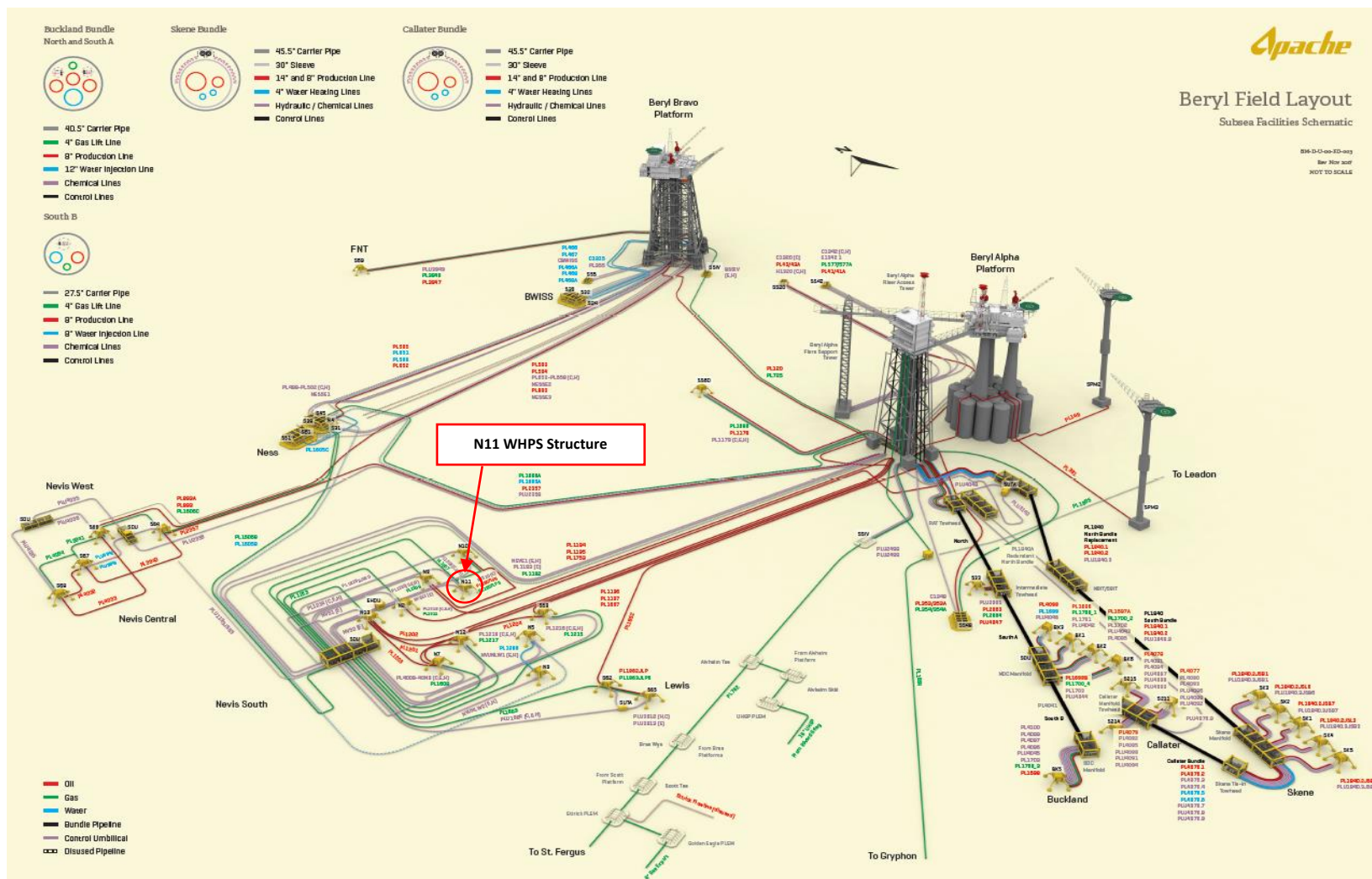



Figure 1.2: Field Layout and Adjacent Facilities

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Note: Adjacent facilities refer to those potentially impacted by this programme

Table 1.4: Adjacent Facilities					
Owner	Name	Type	Distance / Direction	Information	Status
Apache Beryl I Limited	Beryl Alpha Platform	Platform	7513m / 80.19°G	Reception for Nevis South and Ness South pipeline, exports gas to St. Fergus	Operational
Apache Beryl I Limited	Beryl Bravo Platform	Platform	10498m / 35.88°G	Reception for Nevis North and, exports gas to Beryl Alpha	Operational
Apache Beryl I Limited	Beryl Alpha RAT	RAT	7383m / 80.47°G	Riser Access Tower for Beryl Alpha Platform	Operational
Apache Beryl I Limited	Nevis South Well N2	Subsea WHPS	58m / 216.75°G	Oil production well tied back to Beryl Access Tower	Operational
Apache Beryl I Limited	Nevis South Well N13	Subsea WHPS	70m / 225.49°G	Oil production well tied back to Beryl Access Tower	Operational
Apache Beryl I Limited	Nevis South Well N7z	Subsea WHPS	86m / 207.37°G	Oil production well tied back to Beryl Access Tower	Operational
Apache Beryl I Limited	Nevis South Well N12	Subsea WHPS	76m / 201.32°G	Oil production well tied back to Beryl Access Tower	Operational
Apache Beryl I Limited	Nevis South Well S59	Subsea WHPS	69m / 162.47°G	Oil production well tied back to Beryl Access Tower	Operational
Apache Beryl I Limited	Nevis South Well N5Y	Subsea WHPS	75m / 177.25°G	Oil production well tied back to Beryl Access Tower	Operational



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Apache Beryl I Limited	Nevis South Well N9	Subsea WHPS	96m / 179.69°G	Oil production well tied back to Beryl Access Tower	Operational
Apache Beryl I Limited	Nevis South Well N8	Subsea WHPS	39m / 205.10°G	Oil production well tied back to Beryl Access Tower	Operational
Apache Beryl I Limited	Nevis South Well N10	Subsea WHPS	32m / 166.60°G	Oil production well tied back to Beryl Access Tower	Operational
Apache Beryl I Limited	Nevis South Well N15	Subsea WHPS	55m / 346.6°G	Oil production well tied back to Beryl Access Tower	Decommissioned
<b>Impact of Decommissioning Proposals</b>					
There are no direct impacts on adjacent facilities from the decommissioning / removal of the N11 WHPS. Short term environmental impacts associated with this activity are detailed in Section 4.					

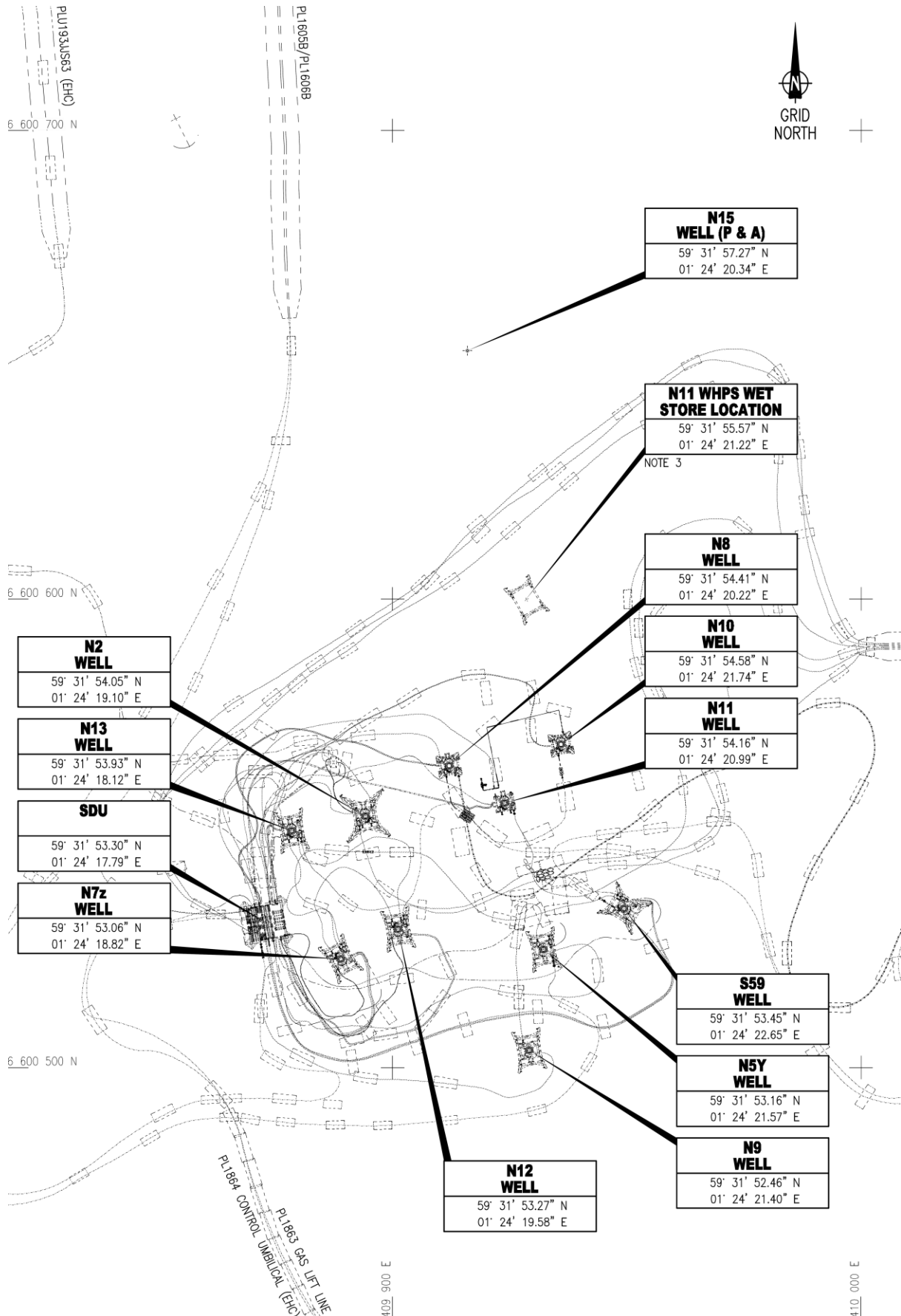



Figure 1.3: Adjacent Facilities


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## 1.7 Industrial Implications

The N11 WHPS removal activity is a standalone project part of the Garten campaign which will be managed by Apache. Subsea 7 has been contracted to undertake this work scope under an existing service framework agreement.

The protective structure has been lifted off the wellhead and moved to a designated wet store location. The structure will then be recovered and returned to shore for reuse, unless the condition is found to preclude refurbishment in which case it will be recycled.


The OGA have been contacted regarding a Supply Chain Action Plan (SCAP) and, in compliance with the current process, a SCAP will be created detailing past and future engagement with the supply chain for this scope.

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## 2 DESCRIPTION OF ITEMS TO BE DECOMMISSIONED

### 2.1 Installation(s): Subsea including Stabilisation Features

Table 2.1: Subsea Installations and Stabilisation Features					
Subsea installations including Stabilisation Features	Number	Size / Weight	Location		Comment / Status
N11 WHPS – Wet Store Location	1	8.95 x 6.7 x 4.2 m In air – 21.5te In water – 18.7te (excluding marine growth)	WGS84 Decimal	59.53 N 01.41 E	Tree has been removed with mechanical plug in place. Flowlines disconnected during 2017 in preparation of abandonment. Flowbase flanges (GL and Prod) blinded and tested. Production flexible blinded, tested and positioned on seabed. Gas lift flowline re-routed with new 2" rigid spools and leak tested. No electrical supplies are present.
			WGS84 Decimal Minute	59° 31' 55.57" N 01° 24' 21.22" E	

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## 2.2 Wells

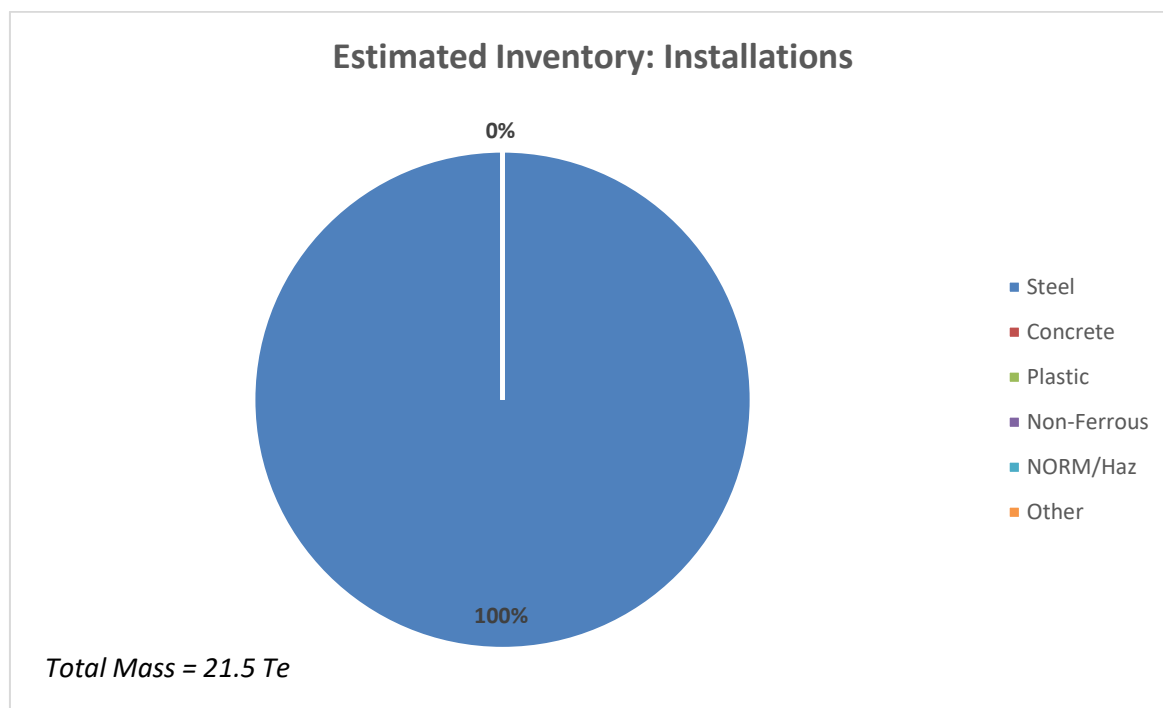
Table 2.2: Well Information			
Subsea Wells	Designation	Status	Category of Well*
1	Oil	Abandoned Phase 3 - Plugged and Abandoned, wellhead has been removed and top of conductor cut	SS 0-0-0

\* Category definition as per Appendix D of OGUK Well Decommissioning Guidelines Issue 6, June 2018

## 2.3 Drill Cuttings


No drill cuttings are deposited on the seabed from the N11 well.

## 2.4 Inventory Estimates



**Figure 2.1: Pie Chart of Estimated Inventories (Installations)**

See the Environmental Impact Assessment Justification for SA/1107 (ML/437).

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### 3 REMOVAL AND DISPOSAL METHODS

#### 3.1 Subsea Installations and Stabilisation Features

Table 3.1: Subsea Installation(s) and Stabilisation Feature(s)			
Subsea installation(s) and stabilisation feature(s)	Number	Option	Disposal Route (if applicable)
WHPS	1	Complete removal	Return to shore for reuse, unless the condition is found to preclude refurbishment in which case it will be recycled.


#### 3.2 Waste Streams

Table 3.2: Waste Stream Management Methods	
Waste Stream	Removal and Disposal method
Bulk liquids	N/A
Marine growth	Removed onshore. Disposed of according to guidelines.
NORM/LSA Scale	N/A
Asbestos	N/A
Other hazardous wastes	N/A
Onshore Dismantling sites	The WHPS will be sent ashore for recycling. Appropriate licensed sites will be selected. Dismantling site must demonstrate proven disposal track record and waste stream management throughout the deconstruction process and demonstrate their ability to deliver innovative reuse and recycling options.

Table 3.3: Inventory Disposition			
Category	Total Inventory Tonnage	Planned tonnage to shore	Planned left <i>in situ</i>
Installations	21.5	21.5	0

All recovered material will be transported onshore for reuse, recycling or disposal. It is not possible to predict the market for reusable materials with any confidence.




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## 4 ENVIRONMENTAL IMPACT ASSESSMENT

### 4.1 Environmental Sensitivities (Summary)

Table 4.1: Environmental Sensitivities	
Environmental Receptor	Main Features
Conservation interests	<p>The closest site of conservation interest to the area is the Braemar Pockmarks Special Area of Conservation (SAC) located 54 km south. The site is designated for the presence of submarine structures made by leaking gases. Areas of gas or fluid seeps are located approximately 25 km south-east of the WHPS and represent potential submarine structures made by leaking gases.</p> <p>The Central Fladen (NCMPA) is located approximately 100 km south-west. This is designated for the presence of seapens and burrowing megafauna and tall seapen components; and sub-glacial tunnel valley representative of the Fladen Deep Key GeoDiversity Area.</p>
Seabed	<p>Water depth at location is 119 m.</p> <p>At a regional scale the area lies over the slope between the northern North Sea plateau and the Bressay Bank area. Substrates at a regional scale generally comprise sand to muddy sand, though an area of coarse sediment (gravelly sand to sandy gravel) occurs to the south west of the area.</p> <p>The majority of the area is indicated to be covered by an intermittent veneer of gravelly sand with numerous shell fragments and occasional cobbles and boulders, overlying outcrops or subcrops of firm to very stiff sandy, gravelly clay and clayey sand. Surface sediments to the east and west of the central area exhibited two distinct types based on the silty sands of the Holocene material and a fine to medium sand with firm to stiff sandy clay, cobbles and boulders.</p> <p>Two biotope complexes were identified “offshore circalittoral sand” (SS.SSa.OSa) and “offshore sublittoral mixed sediment” (SS.SMX.OMx).</p> <p>Sand communities such as SS.SSa.OSa are typically defined by infaunal taxa. Visible fauna included occasionally exposed parchment worms, infaunal clams and worm tubes in addition to sparse motile epifauna such as hermit crabs and seastars.</p> <p>No evidence of the presence of any discrete Annex I habitats protected under the UK’s Offshore Marine Conservation (Natural Habitats, &amp;c.) (Amendment) Regulations 2010, which implement the EC Habitats Directive 92/43/EEC. There were no Annex I habitats protected under the Habitats Directive (1992) or any other species or habitats of conservation importance observed within the survey areas. There was also no indication of any species on the Scottish Biodiversity List (2001) or on the IUCN Global List (2014).</p>
Fish and Fisheries	<p>The WHPS is located in International Council for the Exploration of the Sea (ICES) rectangle 47F1, in an area of spawning (cod, mackerel, haddock, Norway pout, saithe and Norway lobster) and nursery (anglerfish, blue whiting, haddock, European hake, herring, ling, mackerel, Norway lobster, Norway pout and whiting) grounds for several commercially important species. The ICES rectangle 47F1 is also partially within a high egg concentration of Norway pout occurring between March and May in deep waters. The area is known to be a low intensity spawning ground for cod; and a low intensity nursery ground for blue whiting, herring, hake, ling, mackerel, and whiting. One pelagic species (whiting) and five demersal species (cod, haddock, Norway pout, saithe and</p>

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	sandeel) spawn into the water column; thus their eggs and juveniles are not reliant upon specific locations and their spawning activities can cover large sea areas.
Marine Mammals	<p>Four cetacean species are likely to occur within the area: harbour porpoise, minke whale, white-beaked dolphin and killer whale. Harbour porpoise is the most frequently recorded mammal, with moderate numbers during July and low numbers in April and May.</p> <p>Harbour and grey seals may be encountered in the area from time to time. However, due to the distance from the nearest coastline, it is not likely that they use the area with any regularity or in great numbers.</p>
Birds	The sensitivity of seabirds to surface oiling is considered low throughout the year. Seabirds are most vulnerable to oil spills during moulting, when they become flightless and spend a lot of time on the sea surface. The WHPS is located a significant distance from shore, seabirds are unlikely to congregate in the area in high densities at any time of the year, even during moulting.
Onshore Communities	The WHPS is located 163 km south-east from the Shetland Isles. The nearest coastal conservation sites to the WHPS are Sumburgh Head Special Protection Area (SPA) (160 km, designated for Seabird assemblage of international importance including: Guillemot, Kittiwake, Fulmar, Arctic Tern) and Fair Isle Special Area of Conservation (SAC) (175 km, designated for sea cliffs of the Atlantic and Baltic coasts).
Other Users of the Sea	<p>The WHPS is located ICES rectangle 47F1 and the 2017 demersal landings are considered moderate compared to other areas of the North Sea.</p> <p>There are several active oil and gas fields in the vicinity. The closest active installations to the WHPS are Beryl Alpha and Beryl Bravo platforms.</p> <p>A total of 24 ship routes were identified within 10 nautical miles of the WHPS. The types of vessels recorded were in majority offshore support vessels, tankers, cargos and ferries.</p>
Atmosphere	The prevailing winds are from the south-west and north-north-east. Wind strengths in winter are typically in the range of Beaufort scale force 4-6 (6-11 m/s) with higher winds of force 8-12 (17-32 m/s) being much less frequent. Winds of force 5 (8 m/s) and greater, are recorded 60-65% of the time in winter and 22-27% of the time during the summer months. In April and July, winds in the open, central to northern North Sea, are highly variable and there is a greater incidence of north-westerly winds.

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## 4.2 Potential Environmental Impacts and their Management


### 4.2.1 Environmental Impact Assessment Summary

Although there is expected to be some minor, short-term, environmental impact during the decommissioning of the N11 WHPS, long term environmental impacts from the decommissioning operations are expected to be negligible. In addition, incremental cumulative impacts and trans-boundary effects associated with the planned decommissioning operations are expected to be negligible.

The potential environmental impacts of these operations in general and the particular issues related to the recovery operations have been assessed in the MAT application (SA/1107 (ML/437)). A summary of the impacts and environmental control measures identified is provided here, considering the particular context of the protective structure recovery operations. It should be noted that recovery of the wellhead protective structure will not require any use or discharge of chemicals or result in oil bearing discharges to sea. There will be no planned use of explosives during these activities.

**Table 4.2: Environmental Impact Management**


Main Impacts	Management
For decommissioning and removal of the WHPS the impacts are disturbance of the seabed by lifting, temporary placement on seabed if required, noise from vessels and operational discharges from vessels. Impacts are expected to be short-term and localised and of low significance.	<p>Activities will be planned to be executed as efficiently as possible, minimising disturbance of the seabed in order to reduce the potential for impact on the area around the WHPS. The seabed impact area, effectively the plan area or footprint, of the WHPS is 6.7m x 10.3m.</p> <p>Vessels will be managed to minimise the durations required and associated discharge. In addition, on board operational practices will address fuel efficiency, noise management and minimise waste. These are general vessel operations and any discharges would be within current best practice and within in permissible limits, therefore not expected to be significant</p> <p>Vessel noise associated with the project is expected to be negligible in relation to general vessel activity in the area. In addition, other subsea decommissioning scopes (which are generally far larger in scope) have assessed vessel noise as not significant. Therefore, due to the scale of this project it is not anticipated to be a significant impact.</p> <p>Other sea users will be notified in advance of activities commencing via kingfisher bulletins, therefore they can plan for alternative arrangements for the limited period of operations if required.</p> <p>The seabed disturbance caused will be extremely localised. Sensitivity of the receptors to this disturbance is expected to be low and recoverability for the short duration of the operation is expected to be high.</p> <p>Structural integrity of the WHPS is expected to be good, therefore the risk of dropped objects is negligible. However, should such an event occur all reasonable attempts will be made to recover objects identified during visual as left survey.</p>

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## 5 INTERESTED PARTY CONSULTATIONS

Statutory consultees have been given the opportunity to review the activity i.e. removal of the WHPS, during their review of the permitting application for these operations (SA/1107 (ML/437)).

Table 5.1: Summary of Stakeholder Comments		
Who	Comment	Response
<b>Informal Consultations</b>		
Public consultations in Press and Journal and Daily Telegraph	No representations received	N/A
<b>Statutory Consultations</b>		
Global Marine Systems Limited	Receipt of Statutory Letter acknowledged - no representations received	N/A
National Federation of Fishermen's Organisations (NFF)	Receipt of Statutory Letter acknowledged - no representations received	N/A
NIPFO	No representations received	N/A
Scottish Fisherman's Federation (SFF)	No representations received	N/A

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## 6 PROGRAMME MANAGEMENT

### 6.1 Project Management and Verification

An Apache Project Management team will be appointed to manage the operations of competent contractors selected for the N11 WHPS decommissioning activity. Standard procedures for operational control and hazard identification and management will be used. The team will monitor and track the process of consents and the consultations required as part of this process. Any changes in detail to the WHPS removal programme will be discussed and agreed with OPRED.

### 6.2 Post-Decommissioning Debris Clearance and Verification

On completion of the removal of the WHPS, an as-left survey will be carried out. Given the scale of the project footprint it is proposed that an ROV based visual survey is performed to minimise any additional seabed disturbance.

### 6.3 Schedule

A proposed schedule is provided in Figure 6.1. 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.

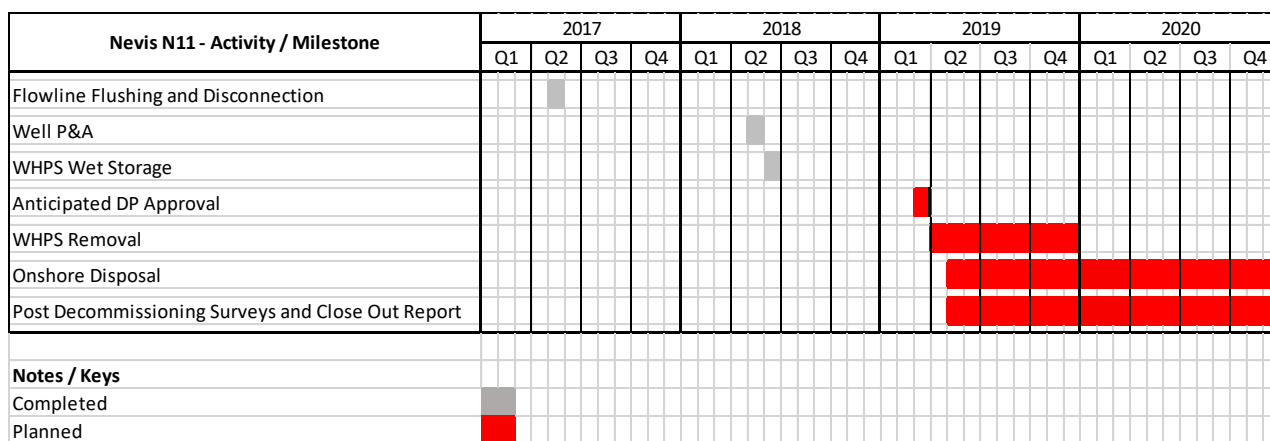



Figure 6.1: Gantt Chart of Project Schedules

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#### **6.4 Costs**

Decommissioning costs will be provided separately to OPRED and OGA.

#### **6.5 Close Out**


A close out report will be submitted to BEIS following completion of the offshore works for the removal of the N11 WHPS, including debris clearance and post-decommissioning surveys, as required in the OPRED guidance notes. The report will explain any variance from the Decommissioning Programme.

#### **6.6 Post-Decommissioning Monitoring and Evaluation**

A post decommissioning as-left survey centred around the location of the N11 WHPS will be carried out on completion of removal of the WHPS. Given the scale of the project footprint it proposed an ROV based visual survey is performed to minimise any additional seabed disturbance. The survey will focus on the “as left” status and physical disturbance of the site.

#### **6.7 Management of Residual Liability**

A full statement on the management of residual liability and its requirements will be provided in the close out report.


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## 7 SUPPORTING DOCUMENTS

Table 7.1: Supporting Documents	
Document Number	Title
A-302309-S00-LAYT-001	N11 Decommissioning Layout

		A-302309-300-LAT1-001	R
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## 8 PARTNER LETTER OF SUPPORT



Chrysaor Limited  
The Capitol Building  
431 Union Street  
Aberdeen  
AB11 6DA

5<sup>th</sup> June 2019

Offshore Petroleum Regulator for Environment  
and Decommissioning  
Department for Business, Energy & Industrial Strategy  
3<sup>rd</sup> Floor, Wing C  
AB1 Building  
Crimon Place  
ABERDEEN  
AB10 1BJ

Dear Sir or Madam,

**Nevis South N11 WHPS Installation Decommissioning Programmes Petroleum Act 1998**

We acknowledge receipt of your letter dated 22<sup>nd</sup> May 2019.

We, Chrysaor Limited, confirm that we authorise Apache Beryl I Limited to submit on our behalf an abandonment programme relating to the Nevis South N11 WHPS as directed by the Secretary of State on 18<sup>th</sup> January 2018.


We confirm that we support the proposals detailed in the Apache Beryl I Limited Decommissioning Programme dated 5<sup>th</sup> June 2019, which is to be submitted by Apache Beryl I Limited in so far as they relate to those facilities in respect of which we are required to submit an abandonment programme under section 29 of the Petroleum Act 1998.

Yours faithfully



Gatsbyd Forsyth  
Asset Manager Beryl, Non Operated Joint Ventures  
For and on behalf of Chrysaor Limited

cc. Apache Beryl I Limited

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## APPENDIX A PUBLIC NOTICE

As published in Press and Journal and The Daily Telegraph on 14<sup>th</sup> March 2019.

### PUBLIC NOTICE

#### The Petroleum Act 1998

#### Nevis South Field (Licence Block 9/13a)

#### N11 Wellhead Protection Structure Decommissioning Programme

Apache Beryl I Limited has submitted, for the consideration of the Secretary of the State for Business, Energy and Industrial Strategy, a draft Decommissioning Programme for the Nevis South N11 Wellhead Protection Structure (WHPS) in accordance with the provisions of the Petroleum Act 1998. It is a requirement of the Act that interested parties be consulted on such decommissioning proposals.

The item covered by the Decommissioning Programme is the N11 WHPS, which is a carbon steel structure weighing 21.5te in air, with approximate dimensions of 6.7m (width) x 4.2m (breadth) x 9.0m (height). It is currently wet stored at the Nevis South field, approximately 151km from the nearest UK coastline and 317km north-east of Aberdeen, at co-ordinates 59° 31' 55.57" N (latitude), 01° 24' 21.22" E (longitude).

Apache Beryl I Limited hereby gives notice that a summary of the N11 WHPS Decommissioning Programme can be viewed at the internet address:

<https://www.gov.uk/guidance/oil-and-gas-decommissioning-of-offshore-installations-and-pipelines>

Alternatively, a hard copy of the Decommissioning Programme can be inspected at the following location during office hours:

Patrick Duggan  
Caledonia House  
Prime Four Business Park  
Kingswells Causeway  
ABERDEEN  
AB15 8PU

Representations regarding the N11 WHPS Decommissioning Programme should be submitted in writing to the above address where they should be received by *27<sup>th</sup> March 2019* and should state the grounds upon which any representations are being made.

Date: 14 March 2019

Patrick Duggan (Subsea & Major Projects Manager)