Our Ref: 01.01.01.01-4228U UKOP Doc Ref:1122552

Offshore Petroleum Regulator for Environment & Decommissioning

PERENCO UK LIMITED 8 HANOVER SQUARE LONDON W1S 1HQ

Registered No.: 04653066

Date: 11th February 2021

Department for Business, Energy & Industrial Strategy

AB1 Building Crimon Place Aberdeen AB10 1BJ

Tel Fax

www.gov.uk/beis bst@beis.gov.uk

Dear Sir / Madam

THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2020 PIPELINE PL24 (LEMAN 27B TO BACTON)

A screening direction for the project detailed in your application, reference PL/2056/0 (Version 1), dated 8th January 2021 has been issued under regulation 6 of the above Regulations. The screening direction notice, and any relevant conditions and comments are attached. A copy of this screening direction will be forwarded to the application consultees, the Oil and Gas Authority and published on the gov.uk website.

If you have any queries in relation to this screening direction or the attachments, please do not hesitate to contact **and the state of the state of**

Yours faithfully

THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2020

SCREENING DIRECTION CONFIRMING THAT AN ENVIRONMENTAL IMPACT ASSESSMENT IS NOT REQUIRED

PIPELINE PL24 (LEMAN 27B TO BACTON)

PL/2056/0 (Version 1)

Whereas PERENCO UK LIMITED has made an application dated 8th January 2021, under The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020, and whereas the Secretary of State has considered the application and is satisfied that the project is not likely to have a significant effect on the environment; in exercise of the powers available under regulation 6, the Secretary of State hereby directs that the application for consent in respect of the project need not be accompanied by an Environmental Impact Assessment, provided that the project is carried out as described in the application for the screening direction and in accordance with the conditions specified in the attached schedule.

In giving a screening direction under regulation 6 of the above Regulations, the Secretary of State accordingly gives his agreement to the Oil and Gas Authority to the grant of consent for the project as detailed in the application.

Effective Date: 11th February 2021

THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2020

SCHEDULE OF SCREENING DIRECTION CONDITIONS

The grant of this screening direction is conditional upon the screening direction holder complying with the following conditions.

1 Screening direction validity

The screening direction shall be valid from 11 February 2021 until 31 July 2021.

2 Commencement and completion of the project

The holder of the screening direction must confirm the dates of commencement and completion of the project covered by the screening direction. Notification should be sent by email to the Environmental Management Team Mailbox: bst@beis.gov.uk

3 Nature of stabilisation or protection materials

Rock deposits

5,648 tonnes of clean, inert rock material, containing minimal fines, (The quantity of rock deposited should be the minimum required to provide the necessary stabilisation or protection, and any surplus rock must be returned to land).

4 Location of pipeline and stabilisation or protection materials

At the PL24 location described in the application; Area 14 - KP 15.600 to KP 16.060.

5 Prevention of pollution

The holder of the screening direction must ensure that appropriate measures are taken to minimise discharges, emissions and waste, in particular through the appropriate use of technology; and to ensure that necessary measures are taken to prevent incidents affecting the environment or, where they occur, to limit their consequences in relation to the environment.

6 Inspections

Should the Department consider it necessary or expedient for an inspector appointed by the Secretary of State to investigate whether the conditions of the screening direction are being complied with, the holder of the screening direction shall afford the inspector with such facilities and assistance as the inspector considers necessary to exercise the powers conferred by the regulations. The holder of the screening direction shall additionally ensure that copies (electronic or paper) of the screening



direction and any other relevant documents are available for inspection by the inspector at:

- a) the premises of the holder of the screening direction; and
- b) the facilities undertaking the project covered by the screening direction.

7 Monitoring

The results of any pre or post-placement surveys carried out to confirm the necessity for the deposits covered by the screening direction and/or to confirm the accurate positioning of the stabilisation or protection materials, should be forwarded to the Department following completion of the surveys

8 Check monitoring

Should the Department consider it necessary or expedient to undertake an independent monitoring programme to assess the impact of the project covered by the screening direction, the screening direction holder shall afford the Department with such facilities and assistance as the Department considers necessary to undertake the work.

9 Atmospheric emissions returns

Following completion of the project covered by the screening direction, the holder of the screening direction shall report all relevant atmospheric emissions, such as combustion emissions, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting forms.

10 Deposit returns

The holder of the screening direction shall submit a report to the Department following completion of the deposit covered by the screening direction, confirming the quantity of materials deposited and the estimated area of impact, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting form. Where no deposits are made, a 'nil' return is required.

11 Unauthorised deposits

Following completion of the project covered by the screening direction, the holder of the screening direction shall recover any materials accidentally or temporarily deposited on the seabed, such as debris, temporary containers, structures or deposits, or scientific instruments, and shall return the materials to land. If it is not possible to recover any of these deposits, full details of the materials remaining on the seabed must be reported to the Department in accordance with the requirements of Petroleum Operations Notice No.2 (PON2).

12 Screening direction variation

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In the event that the holder of the screening direction proposes changes to any of the particulars detailed in the application for a screening direction, the holder must notify the Department immediately and submit an application for a post screening direction amendment. The post screening direction must be in place prior to the amended proposals taking effect.

COMMENTS ON THE APPLICATION FOR SCREENING DIRECTION

Section 1

The attention of screening direction holders is drawn to the following provisions regarding The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

1) You are deemed to have satisfied yourself that there are no barriers, legal or otherwise, to the carrying out of the project covered by the screening direction. The issue of a screening direction does not absolve the screening direction holder from obtaining such authorisations, consents etc that may be required under any other legislation.

2) The Department would draw your attention to the following comments:

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1. There is a risk of disturbance and displacement of red throated diver (RTD) an Annex I interest feature of the Greater Wash SPA from vessels transiting to the location of the proposed works. We therefore advise that the following best practice is adopted to mitigate any impacts:

- restricting vessel movements where possible to existing navigation routes (to areas where RTD are likely to be lowest);

- maintaining direct transit routes (to minimise transit distances through areas used by divers);

- avoidance of over-revving of engines (to minimise noise disturbance); and,

- ensure vessel operators aware of the importance of the species (tool box talk), avoiding rafting birds either in-route from operational port and where possible avoid disturbance to areas with consistently high diver density.

2. It is acknowledged that freespan correction and preventing pipeline buoyancy are essential to ensure pipeline integrity and the safety of other users of the sea, in particular fishing vessels. However, the deposit operations should not continue beyond the locations specified in the application without submitting a variation to assess further impacts, particularly given the marine protected areas in the vicinity of this pipeline.

3) All communications relating to the screening direction should be addressed to:

Out-of-hours emergency screening direction variations:

Telephone Met Office out-of-hours service (0330 135 0010) and ask to be connected

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to the Department's On-call Response Officer (Offshore Environmental Inspectorate).

Routine communications

bst@beis.gov.uk

or

Offshore Petroleum Regulator for Environment & Decommissioning Department for Business, Energy & Industrial Strategy AB1 Building Crimon Place Aberdeen AB10 1BJ

Tel

SCHEDULE OF SCREENING DIRECTION DECISION REASONS

The Secretary of State has decided that, based on the information provided, the project is not likely to have a significant effect on the environment. The main reasons for this decision are:

1) Decision reasons

The Leman 27B to Bacton gas export pipeline (PL24) is regularly inspected (at approximately 3 months intervals) to monitor the development of exposures and freespans. Remediation works on the pipeline have been identified as necessary. Up to 5,648 tonnes of rock deposits (this includes 100% contingency of 2,824 tonnes) may be needed to provide a rock berm support to reinforce rock filter units (RFUs) and concrete mattress deposits and provide additional support to the pipeline and hanging mattresses at 'Area 14' (KP 15.600 to KP 16.060) on PL24. Up to 151 mattresses and 64 RFUs were previously permitted for this project. These additional rock deposits will cover an area of 1,156 m2 and are one element of the pipeline remediation programme and the quantity will be kept to a minimum. Overall, the remediation programme is anticipated to disturb up to 3,102.7 m2 of seabed.

The operational time frame to deposit the rock is between February and July 2021, but the operations to deposit the rock will take up to 2 days.

Freespan correction and the prevention of pipeline buoyancy are essential to ensure pipeline integrity (and prevent pipeline failure) and protect the safety of other users of the sea. Fishing vessels are particularly vulnerable to snagging hazards such as these and remediation works will minimise the risk considerably by reducing the height and length of the identified spans to within acceptable limits (no longer than 10 metres in length and no higher than 0.8 metres).

The project is not at risk from natural disasters, or unplanned major accident scenarios and there is no risk to human health.

The project is located 54.2 km east from the Norfolk coastline in England and 60.5 km west of the UK/Netherlands median line, in an area where water depth is approximately 15 m and the seabed sediments are sandy. The location of the rock deposits is within two marine protected areas; Haisborough, Hammond and Winterton (HHW) Special Area of Conservation (SAC), with sub-tidal sandbank and reef features, and the southern (winter) part of Southern North Sea (SNS) SAC, with harbour porpoise features. Other deposits within the programme are within the North Norfolk Sandbanks (NNS) SAC, with sub-tidal sandbank and reef features.

Surveys in the area have identified distinct epifaunal assemblages in different areas of the HHW SAC. Three assemblages were widespread and coincided with areas of *Sabellaria spinulosa* reef and sandbank troughs. Sites representing reef were characterised as being predominantly 'slightly gravelly sand'. Sites representing sandbank flanks and crests were constituted primarily of 'sand'. Sites representing



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sandbank troughs had a sedimentary profile which spanned several sediment classes, from 'sand' to 'gravelly muddy sand' in varying proportions.

Further assessment of the historic survey data and video taken during pipeline inspections has been undertaken. There is good correlation between the video data, and the multibeam survey, where the multibeam picks up the features identified as *Sabellaria spinulosa* reef. All planned locations for deposits have been checked for the presence of reef features, and *Sabellaria* was not found in between the start and stop locations for Area 14.

Peak spawning for cod, mackerel, Nephrops, plaice, sole and sprat may coincide with the project works. Harbour porpoise and white-beaked dolphin have been sighted in the area. The rock deposits area is not within a commonly fished ground and fishing effort is historically very low. The surrounding area has lots of other oil and gas infrastructure, the nearest Royal Airforce Practice and Exercise Area (PEXA) is approximately 48 km north of the PL24 pipeline, and the closest renewable wind farm, North Vanguard West, is located approximately 9km to the southeast and is currently in the planning stage.

Potential impacts to the environment from the activities associated with the project were assessed, with particular focus on the predominant impacts resulting from physical presence and seabed disturbance of the rock deposit placement.

The physical presence of the single vessel involved with the 14-day work programme (for all deposits) will not have an exclusion area, however the vessel will be subject to navigational provisions and able to move away in an emergency. The project is in a very low-level fishing area and so the impact to other users of the sea is not expected to be significant. Noise and atmospheric emissions from the vessel were scoped out of the assessment, due to no potential for significant effects.

The overall remediation programme has the potential for the deposit of up to 151 concrete mattresses, 64 RFUs and 5,648 tonnes of rock along the PL24 pipeline. This will cause seabed disturbance and loss of soft sediment habitat in an area of up to 3,102.7 m2 along the pipeline corridor (e.g. some deposits will be laid on the pipeline and previous deposits). This is a conservative estimate as it assumes that all the deposit material will be used, which is unlikely. This is a relatively small area compared to the wider southern North Sea with similar soft sediment habitat. Up to 3003.7 m2 of deposits (including the 5,648 tonnes rock deposits from this application) are proposed within the HHW SAC impacting 0.0002046 % of the total SAC area (99 m2 in NNS SAC or 0.0000025 % of the total SAC).

The placement of the deposits will have a permanent impact on the local sediment faunal communities, potentially smothering any flora and fauna directly beneath it. No notable species of conservation importance (i.e. areas of *Sabellaria spinulosa* reefs) were identified during the recent pipeline inspection surveys. In addition, the deposits will be made in areas where the pipeline and some existing deposits are already in place, therefore the impact on undisturbed sediments has been kept to a minimum. Given the above, it is not anticipated that the proposed deposits will significantly



reduce the extent and distribution of subtidal sandbank communities across the North Norfolk Sandbanks and Saturn Reef and Haisborough, Hammond and Winterton SAC's and therefore the structure and function of the sandbanks will not be significantly adversely impacted by the PL24 deposit operations.

There are no expected transboundary impacts because of the works, and no cumulative impacts have been identified given the other known approved projects in the wider area.

Taking all the above determinations into account, the Secretary of State has concluded that the project is not likely to have a significant impact on the environment.