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Offshore Petroleum Regulator
for Environment & Decommissioning

SHELL U.K. LIMITED
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Registered No.: 00140141

Date: 5th March 2021

Department for Business, Energy
& Industrial Strategy

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bst@beis.gov.uk

Dear Sir / Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020
LEMAN-BACTON MEG PIPELINE REPAIR - PIPELINE PL121 & LEMAN-BACTON
GAS EXPORT PIPELINE SPAN REMEDIATION - PIPELINE PL25**

I refer to your amended application dated 4th March 2021, reference PL/2064/1 (Version 4).

It has been determined that the proposed changes to the project is not likely to result in a significant effect on the environment, and therefore an environmental impact assessment is not required.

A screening direction is therefore issued for the changes to the project. An amended schedule of conditions, comments, and main reasons for the decision on the amended application, 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 [REDACTED] on [REDACTED] or email the Environmental Management Team at bst@beis.gov.uk.

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**

**LEMAN-BACTON MEG PIPELINE REPAIR - PIPELINE PL121 & LEMAN-BACTON
GAS EXPORT PIPELINE SPAN REMEDIATION - PIPELINE PL25**

PL/2064/1 (Version 4)

Whereas SHELL U.K. LIMITED has made an application dated 4th March 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: 5th March 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 10 February 2021 until 31 August 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 (PL/2064/0)

160 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).

Rock deposits (PL/2064/1)

25,000 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).

Grout bags deposits (PL/2064/0)

20 tonnes of grout contained within 25 kilogramme capacity biodegradable bags. (The number of bags deposited should be the minimum required to provide the necessary protection, and any surplus bags must be returned to land).

4 Location of pipeline and stabilisation or protection materials

PL121

LAT: 53d 01' 14.11" North

LONG: 01d 44' 45.08" East



Datum - WGS84

PL25

LAT: 53d 01' 14.82" North

LONG: 01d 44' 48.99" East

Datum - WGS84

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

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:

No comments.

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 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 [REDACTED]
Fax



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 following provides a summary of the assessments undertaken by OPRED to determine whether an Environmental Impact Assessment is required for this project. This document summarises the information considered, the potential impacts and sets out the main reasons for the decision made.

In considering whether an Environmental Impact Assessment is required or not, the following have been taken into account:

- a) The information provided by the developer;
- b) The matters listed in Schedule 5 of The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Regulations 2020) (the Regulations);
- c) The results of any relevant preliminary verifications or assessments of the effects on the environment of the project; and
- d) Any conditions that the Secretary of State may attach to the agreement to the grant of consent.

Characteristics of the project:

This screening direction (ref: PL/2064/1) relates to a change to the project for which a screening direction was previously given (ref: PL/2064/0).

Having regard, in particular, to the matters identified at paragraphs 1(a) to (g) of Schedule 5 to the Regulations, the characteristics of the project include the following:

Project outline:

- Deposit of up to 25,000 tonnes of loose rock on the Leman-Bacton gas export pipeline

Description of project

The original screening direction (PL/2064/0) relates to repair works on a pipeline carrying Mono Ethylene Glycol from Bacton to Leman Alpha platform. That project involves repairing the damaged pipeline by (a) replacing a 90 m section of the buried pipeline with three 30 m pipeline sections, (b) pressure testing the repair for integrity and carrying out visual observations to confirm the connections are fully sealed and adequate, and (c) placement of grout bags and loose rock to protect the newly installed pipeline spools from seabed movement and impact from fishing gear. The



repair works are expected to be carried out by August 2021.

As part of that project, surplus deposits were to be used to carry out work in relation to an associated gas export pipeline on the Leman field to Bacton gas export pipeline. The gas export pipeline has a major span which extends over 80 m in length and is approximately 4 m deep.

A recent survey of the gas export pipeline span has now identified a significant safety risk, which if left, could result in a catastrophic failure of the line and potentially a release of 180 cubic metres of oil. There is therefore an urgent requirement to rectify the pipeline.

This screening direction (ref: PL/2064/1) relates to the urgent project to rectify the gas export pipeline span. Loose rock will be used to fill the void below the pipeline and on top of the pipeline to protect it from trawl gear interference.

The project is intended to take place in March 2021. Works will be undertaken using a work vessel, a specialised rock deposits vessel and a guard vessel. The project is not at risk from natural disasters given its location, or unplanned major accident scenarios. However, if the pipeline span is not remedied quickly the pipeline is at risk of failure.

The nearest oil and gas installation is less than 5 kilometres (km) from the pipeline location. However, given the small geographical scale of the project, no cumulative interactions are foreseen with any other existing or approved projects.

Divers will not be used for the span remediation works and no other significant risks to human health are anticipated.

Location of the project:

Having regard, in particular, to the matters identified at paragraphs 2(a) to (c) of Schedule 5 to the Regulations, the environmental sensitivity of geographical areas likely to be affected by the project has been considered as follows:

The project is located 26 km east from the Norfolk coastline in England and 103 km west of the UK/Netherlands median line, in an area where water depth is approximately 19 m and the seabed is characterised as circalittoral fine sand. The predominant current in the location is south-easterly with wave heights of 2 to 2.5 m. The project location is within the Southern North Sea Marine Protected Area, designated for the protection of harbour porpoise, and within the Haisborough, Hammond and Winterton Marine Protected Area, designated for the protection of sandbanks and reefs.

Site-specific surveys identified the seabed as comprising rippled sand with areas of rock cover on the existing pipeline. The survey results revealed a dense community of fauna in both sand and rock-introduced areas. Occasional aggregations of *Sabellaria spinulosa* were observed, however the densities at which they were noted



and their presence within rock-introduced habitat meant that they would not be recognised as a protected reef-forming habitat aggregation. The majority of the recognised reef areas of the site are to the south west of the protected area boundary, which is more than 40 km from the location of the works. The project works are located within the footprint of one of the sandbanks protected by the site boundary.

The project works may take place during peak spawning periods for mackerel and sprat but will not take place when high intensity spawning periods for fish/shellfish are known to occur. Sightings of harbour porpoise have not been recorded during the period for which the project works are planned. The project area is not within a commonly fished ground and fishing effort is historically very low. There is a large amount of other oil and gas infrastructure in the surrounding area, the project location is not within a military activity zone, and the closest renewable wind farm is located more than 30 km to the northwest.

Given the location of the project, the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) and (viii) of Schedule 5 are not likely to be affected by the project.

Type and characteristics of the potential impact:

In accordance with paragraph 3 of Schedule 5 to the Regulations, the likely significant effects of the project on the environment have been considered. Potential impacts to the environment from the activities associated with the change to the project were assessed, with particular focus on the predominant impacts resulting from (a) seabed disturbance from the increased quantity and location of loose rock to be used to remediate a span on the export pipeline, (b) atmospheric emissions from the increased use of vessels and vessel time on the project, and (c) physical presence from the vessels at the location.

The loose rock used to remedy the pipeline span, support the pipeline, and protect it from future erosion and fishing gear interaction will be placed under and on the pipeline using a fall-pipe from the vessel. Rock was chosen as the most appropriate material for the works given the urgency of the project and the availability and appropriateness of other alternatives. Precision in placement of protective rock will be ensured via a post-rock installation survey. The affected seabed area has been calculated based on the rock covering a 40 m corridor along the pipeline with disturbed sediment fall-out contained within an additional 10 m corridor. The use of rock includes a contingency that represents 20% of the total amount, and this contingency may not be used which would reduce any potential impact further. The total area of seabed impacted will be 0.0077 km², when combined with the original scopes of the project. The main impacts expected are from smothering and change of habitat. Given the absence of epi-faunal and in-faunal benthic organisms in the location of the works, the impacts are expected not to be significant and recolonisation is likely. Given the transient nature of mackerel and sprat in the area, being pelagic spawning species, combined with the very small area of seabed to be impacted by the works, the impact to spawning mackerel and sprat is not expected to be significant.



The sandbank system within the protected site is not expected to be compromised as the small area impacted by the introduction of hard substrate will not affect the sediment transport and development of the wider sandbank system. Further, the introduction of loose rock will be on an area of pipeline and seabed previously protected by rock, so the majority of seabed impacted will have previously been occupied by rock. The seabed disturbance will impact 0.00052% of the Haisborough, Hammond and Winterton Marine Protected Area. The conservation objectives of the site will not be compromised by the project, given the expected recovery from seabed disturbance and will therefore not have a likely significant effect on the environment. In addition, the proposed remediation works are not considered to pose any risk of significant effect on the southern North Sea Marine Protected Area.

Atmospheric emissions are likely from the combustion plant on the vessels involved in the pipeline works. Work plans have been optimised through planning to reduce reliance on supply materials to the vessels. Emissions measured as carbon dioxide equivalents attributed to the project when compared to the offshore industry as a whole are less than 0.1%. The atmospheric emissions impact on the environment from the vessels, is not considered to be significant.

The physical presence of the vessels involved with the work programme will not have an exclusion area attributed to them and would be able to move away from location 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.

There are no expected transboundary impacts as a result of the project, and no cumulative impacts have been identified given the other known existing and approved projects in the wider area.

Decision

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.

2) Mitigation of significant effects

The following are features of the project or measures envisaged that the developer has proposed to avoid or prevent what might otherwise have been significant adverse effects on the environment:

Not applicable.