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Offshore Petroleum Regulator
for Environment & Decommissioning

TOTAL E&P UK LIMITED
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Registered No.: 00811900

Date: 4th June 2021

Department for Business, Energy
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Dear Sir / Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020
PIPELINE PLU2763**

A screening direction for the project detailed in your application, reference PL/2124/0 (Version 1), dated 11th May 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 [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**

PIPELINE PLU2763

PL/2124/0 (Version 1)

Whereas TOTAL E&P UK LIMITED has made an application dated 11th May 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: 4th June 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 4 June 2021 until 31 January 2022.

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

Laggan location

12, 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).

Tormore location

9, 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).

Gravel bags deposits

Laggan location

20 X 1 tonne gravel 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).

Tormore location

40 X 1 tonne gravel 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).

Concrete mattress deposits

Laggan location

2 concrete mattresses, each measuring 6 metres x 3 metres. (The number of mattresses deposited should be the minimum required to provide the necessary protection, and any surplus mattresses must be returned to land).

4 Location of pipeline and stabilisation or protection materials

As described in the application.

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:

PL/2124/0 - 4th June 2021

The following comments are for information only to help inform future applications:

1. Section 3.5. (Decommissioning) - For future applications OPRED encourages Total to consider the use of alternative protective materials to minimise the amount of rock used within the 500 m safety zones and investigate alternatives that can be more readily removed at decommissioning.

2. Section 4.1 (Environmental Description) - The environmental survey used in support of this application is now twelve years old. In accordance with section 2.5 of The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020 - A Guide (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/), where survey data is over five years old, it is advised that a robust evidence based case is provided as to why the environmental survey data remains appropriate.

3. Have any recent visual inspections been conducted such as pipeline inspection surveys which would add additional confidence that the environmental conditions at this location remain the same? It would also provide reassurance that no Priority Marine Features are in the vicinity of the proposed operations which could be significantly impacted.

4. OPRED accepts the environmental survey on this occasion given the scale of the proposed works and that most works are contained within the respective 500 m safety zones at Laggan and Tormore.

5. Section 4.3.1. (Plankton) - *Tripos lineatum* should be regarded as *Tripos lineatus*.

6. Section 4.3.2. (Benthos) - The section contains an error message.



7. Section 4.3.2 (Figure 4-3) - It would be beneficial if this figure is labelled to allow the location to be cross referenced with Figure 4-1.

8. Section 4.3.3. (Fish and shellfish) - ICES 50E7 contains a small area of herring spawning to the southeast which should be included for completeness.

9. Section 4.4.3. (National Marine Plan) - Table 4-5 (Oil & Gas Policy and Objectives) - In Table 4-4 Total have briefly described how they plan to meet the wider NMP policies. However, with respect to Table 4-5 MSS it would be beneficial if Total could provide a brief explanation on how they intend to conduct operations in accordance with the principles of Best Available Technology (BAT) and Best Environmental Practice (BEP).

10. Section 4.5.7. (Wrecks) - It should be noted that the NMPi also shows two unknown wrecks located some 11 km to the NNE of the Towmore location.

11. Section 5.2. (Atmospheric emissions) - It should be noted that updated shipping emissions data is available in the following report: 'BEIS (2021). 2019 UK Greenhouse Gas Emissions, Final Figures. Statistical Release: National Statistics'. Available online at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/9

12. Section 5.3 (Seabed disturbance) - The section implies that concrete mattresses are considered as permanent deposits. What is the likelihood that these will be removed at the time of decommissioning?

13. For information: the EMODNET Human Activities data portal now contains useful up to date shipping information based on the Automatic Identification System (AIS). Further information is available here:
<https://www.emodnet-humanactivities.eu/view-data.php>

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

Our Ref: 01.01.01.01-4500U
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SCHEDULE OF SCREENING DIRECTION DECISION REASONS

Laggan to Edradour (PLU3938), Laggan to SGP (PLU2763) and Laggan to Tormore (PLU2763) Umbilical End Replacement

This provides a summary of the assessments undertaken by OPRED to determine whether an Environmental Impact Assessment is required for this project. It 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 preliminary verifications 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

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

Summary of project

Umbilical end replacement of 3 umbilicals

Re-laying of 3 umbilicals along original route

GRP cover re-instatement

Deposit of the following protective material:

PLU2763 (at Laggan) Rock Grade 1" - 5" 4,500 tonnes

PLU2763 (at Laggan) Rock Grade 1" - 5" 4,500 tonnes

PLU3998/PLU2763 (at Laggan) Rock Grade 1" - 5" 3,000 tonnes

PLU3998/PLU2763 (at Laggan) Gravel bags (1 tonne) X 20



PLU3998/ PLU2763 (at Laggan) Concrete mattresses (6 m x 3 m) X 2

PLU2763 (at Tormore), Rock Grade 1" - 5" 4,500 tonnes

PLU2763 (at Tormore), Rock Grade 1" - 5" 3,000 tonnes

PLU2763 (at Tormore) , Rock Grade 1" - 5" 1,500 tonnes

PLU2763 (at Tormore), Gravel bags (1 tonne) X 40

Description of project

At the Laggan manifold, the umbilicals ends to be replaced are located along 3 umbilical routes: the Laggan-Edradour umbilical (PLU3998); the Laggan-Tormore umbilical (PLU2763) and the Laggan-SGP Umbilical (PLU2763). Each of the three umbilical ends to be uncovered are a length of 750 m per route. It is required to remove 750 m of each umbilical route. The operations will involve the removal of the existing rock cover within the pipeline corridor, followed by the temporary removal and wet storage of the GRP covers within the vicinity of the Laggan and Tormore manifolds. The umbilicals will then be recovered and the necessary components replaced like-for-like. The umbilical will then be commissioned to ensure successful replacement and pressure and leak tested. New rock dump will be installed to ensure the umbilical protection. Concrete mattresses may be used to stabilise a crossing point of the Edradour and Tormore umbilicals and gravel bags may be used at the Laggan and Tormore manifolds for further stabilise the GRP covers. The proposed rock installation via a fall pipe and GRP re-instatement is due to commence on the 4th of June 2021 using the Heavy Construction Vessel (HCV), Deep Arctic and is anticipated to take up to 20 days.

It is not considered to be likely that the project will be affected by natural disasters, or unplanned major accident scenarios and there is no risk to human health.

Location of the project

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

The Laggan field, which is in United Kingdom Continental Shelf (UKCS) Blocks 206/1a and 205/5a, and the Tormore field which is in UKCS Block 205/5 and 205/4 in the West of Shetland (WoS). The Laggan and Tormore fields are located approximately 91 km northwest of the Shetland Islands and 62 km from the United Kingdom (UK) / Faroese median line.

The water depth within the Laggan field varies between 520 m to 640 m and between 554 m to is 661 m in the Tormore field. Sediments within the Laggan-Tormore region comprise predominantly of gravelly muddy sand within Block 206/6 and 205/5 with



slightly gravelly sandy mud at the north-western corner of Block 205/5 and the northern half of Block 205/4. Both the Laggan and Tormore fields are located within and area of 'Atlantic and Arctic influenced offshore subtidal sands and gravels occurring on and off the continental slope'. The WoS region hosts several seabed features that may be of ecological importance such as, but not limited to, reef habitats and iceberg ploughmarks, which are scars in the seabed caused by the scouring action of icebergs during past glacial ice ages. Over time these scars have been partially filled with sediments, which support specific habitats, such as Annex 1 rocky reef in the form of boulders. Although boulders have been recorded along the Tormore to Laggan route, these were isolated and are not considered to constitute a rocky reef habitat. Additionally, there are areas of iceberg ploughmark located approximately 12 km southeast of the proposed operations.

Sediments recorded within the Laggan area supported a moderately abundant infauna assemblage. The dominant taxa were all either arctic-boreal or cosmopolitan (found worldwide) in distribution. The numerically dominant taxa included the polychaetes *Paramphinome jeffreysii*, *Notoproctus* sp., *Pista cristata*, *Chaetozone jubata* and aorid amphipods. Other numerous taxa included the crustaceans *Typhlotanais* sp. and *Harpinia antennaria*, the polychaetes *Glycera capitata* and *Proclea* sp., the sipunculan *Thysanocardia* cf. *procera* and the bivalve molluscs *Yoldiella lucida* and *Thyasira obsoleta*.

The dominant taxa recorded in the Tormore area are all either arctic-boreal or cosmopolitan (found worldwide) in distribution. The numerically dominant taxa included the ampharetid polychaete *Paramphinome jeffreysi*, the tubicolous terebellid polychaete *Pista cristata*, *Galathowenia fragilis*, *Yoldiella lucida* and *Glycera lapidum* agg. Six of the eleven most dominant taxa were polychaetous annelids, the exceptions being *Y. lucida*, the sipunculan *Golfingiidae* sp., the bivalve mollusc *Thyasira obsoleta* and the amphipods *Aoridae* sp. and *Harpinia antennaria*.

All the dominant fauna are either burrowing or sedentary tubicolous species.

The proposed operations will take place within the Faroe-Shetland Nature Conservation Marine Protected Area (NC MPA), which is designated for Deep-sea sponge aggregation, ocean quahog aggregations and the presence of offshore subtidal sands and gravel. Both species are classified as Scottish Priority Marine Features (PMFs) and are on the list of the Oslo and Paris Convention (OSPAR) List of threatened and/or declining species and habitats. Offshore subtidal sands and gravel are listed as a UK Biodiversity Action Plan Priority Habitat.

Several species of sponge were recorded along the Tormore to Laggan route. Although small/singular sponges on the seabed have been recorded, no mass sponge aggregations have been found in the vicinity. No protected species or habitats (such as ocean quahog, seapens or pockmarks) were recorded within the Fugro (2007a; 2007b) surveys at Laggan and Tormore. Additionally, no other Annex I habitats were identified in any of the surveys in the vicinity of the Laggan and Tormore area.



The Laggan and Tormore fields are in International Council for the Exploration of the Sea (ICES) rectangles 50E6 and 50E7, in an area of spawning and nursery grounds for several commercially important species. Both ICES rectangle 50E6 and 50E7 are in areas experiencing high intensity nursery for anglerfish *Lophius piscatorius*, blue whiting *Micromesistius poutassou* and mackerel *Scomber scombrus*. Of the species found in ICES rectangle, the following species are also listed as Scottish Priority Marine Features (PMFs); anglerfish, blue whiting, cod *Gadus morhua*, common skate *Dipturus intermedius*, herring *Clupea harengus*, ling *Molva molva*, mackerel, Norway pout *Trisopterus esmarkii*, spurdog *Squalus acanthias* and whiting *Merlangius merlangus*.

The following species have been recorded within the area of proposed operations: northern fulmar, sooty shearwater *Ardenna grisea*, European storm-petrel *Hydrobates pelagicus*, northern gannet, Arctic skua *Stercorarius parasiticus*, great skua *Stercorarius skua*, black-legged kittiwake, great black-backed gull *Larus marinus*, herring gull *Larus argentatus*, glaucous gull *Larus hyperboreus*, common guillemot, little auk *Alle alle* and Atlantic puffin *Fratercula arctica*.

Atlantic white-sided dolphin, common dolphin, harbour porpoise, killer whale, long-finned pilot whale and white-beaked dolphin have been recorded in moderate and high densities the vicinity of the Lagan and Tormore fields.

The Laggan and Tormore fields are located approximately 91 km offshore, therefore grey and harbour seals may be encountered from time to time, but it is not likely that they use the area with any regularity or in great numbers.

The proposed operations lie within ICES rectangles 50E6 and 50E7. ICES rectangle 50E6 is targeted mainly for demersal species, while ICES rectangle 50E7 was targeted for demersal and pelagic species.

The Laggan and Tormore fields are in an area defined as having very low shipping density.

The Laggan and Tormore fields are in an area of oil and gas developments, the nearest is the Claire Ridge platform, located 31km southeast.

Blocks 205/4, 205/5 and 206/1 lie within a Ministry of Defence (MoD) restricted area. This restriction is in relation to the siting of an installation that is fixed to the seabed, resting on the seabed, floating, intended for drilling or getting hydrocarbons, or involves injection of fluids. The future operations will consider these restrictions when offshore operations are discussed, however, utilising the existing infrastructure will limit activity within these Blocks. All associated works and activities will need to be approved by the MoD and coordinated with MoD range activities.

Additionally, Blocks 205/4, 205/5 and 206/1 are out with any Military munition disposal sites, MoD establishments and Military exercise areas.

The closest submarine cable is the Farice telecom cable located 18 km southwest



from the Tormore manifold. Additionally, the SHEFA-2 Faroese telecom cable lies approximately 31 km southeast of the Laggan manifold.

There are no renewable energy operations within the vicinity of the planned operations. The closest Sectoral Marine Plan (SMP) to the Blocks is the NE1 and N2 sites located 132 km and 137 km from Block 206/1, respectively, which are draft plan options. The closest plan option for 2020 is the NE1 sites located 138 km to the southeast from Block 206/1.

There are no wrecks, historic MPAs (hMPAs) or Scheduled monuments within Blocks 205/4, 205/5 and 206/1. The closest is an unknown obstruction approximately 20 km south of Block 205/5.

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

Type and characteristics of the potential impact

In accordance with Schedule 5 paragraph 3 of the Regulations, the likely significant effects of the project on the environment have been considered. Potential effects on the environment from the activities associated with the project were assessed, including impacts arising from physical presence of a vessel on location and seabed disturbance.

Other than the matters considered further below, there is not likely to be any significant impact of the project on population and human health.

The operations will take place within and out-with the established 500m safety zone at the Laggan and Tormore manifolds and the vessels will be subject to navigational provisions and able to move away in an emergency. In addition, appropriate measures will be undertaken to ensure snagging hazards from fishing activity will be not pose a risk. The impact to other users of the sea is not expected to be significant. Noise and atmospheric emissions impacts are also not considered to be significant.

It is assumed that the new rock deposits will be placed within the area already disturbed by the removal of existing rock deposits. Therefore, the new rock deposits will be within the footprint of the removed rock and will not result in further disturbance. The total area of disturbance will be less than 0.3 km² which has the potential to cause direct impact on benthic communities and given the nature of the sediments in the area and the nature of the benthic communities inhabiting these sediments, it is anticipated that the direct impacts from installation operations will cause relatively short-lived and recoverable-level disturbance to the benthic communities affected. Therefore, any impacts are considered not to be significant.

The seabed impact from expected from the proposed operations equates to 0.006% of the Faroe-Shetland Sponge Belt NC MPA. It is recognised that there are other oil and gas operations in the area, but their footprint is likely to be limited and unlikely to



result in a large-scale loss of habitat. The potential for cumulative impact is therefore limited and not likely to cause a significant effect on the site.

The primary source of noise impact will be from the DP thrusters of the vessels, but the increase in noise because of the vessels during the proposed operations is unlikely to have a significant effect on cetacean species.

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

Decision

Taking the above considerations into account, the Secretary of State has concluded that the project is not likely to have a significant impact on the environment and that an environmental impact assessment is not required.

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:

There are no significant affects.