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Offshore Petroleum Regulator
for Environment & Decommissioning

PERENCO UK LIMITED
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Registered No.: 04653066

Date: 9th June 2021

Department for Business, Energy
& Industrial Strategy

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Aberdeen
AB10 1BJ

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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
PIPELINE PL22**

A screening direction for the project detailed in your application, reference PL/2113/0 (Version 2), dated 4th June 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 PL22

PL/2113/0 (Version 2)

Whereas PERENCO UK LIMITED has made an application dated 4th June 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: 9th 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 9 June 2021 until 30 September 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 Filter Unit deposits

22 rock filter units (RFUs), each being 4 tonnes. (The number of RFUs deposited should be the minimum required to provide the necessary protection, and any surplus bags must be returned to land).

Concrete mattress deposits

230 concrete mattresses, each measuring 6 metres x 3 metres x 50 centimetres. (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

In the locations specified 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:

The Department has no comments to make at this time.

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]



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

Indefatigable 23A to Lemn 27B PL22 Pipeline Stabilisation Deposits

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

Up to 230 concrete mattresses and 22 RFUs may be deposited onto the PL22 pipeline to maintain pipeline stability in 18 areas of exposures and freespans.

Description of project

Indefatigable PL22 pipeline exports processed gas from the Inde 23A platform (UKCS Block 49/23) to the Lemn 27B platform (UKCS Block 49/27) in the southern North Sea. PL22 is routinely inspected to monitor the development of exposures and freespans and remediation works on the pipeline are undertaken as necessary. A recent pipeline inspection survey at PL22 completed in February 2021 identified the



development of further exposures and freespans at several locations. All concrete mattresses and RFUs will be deployed to the seabed via a vessel crane and placed in the required locations with the use of a remotely operated vehicle (ROV) and acoustic positioning. Operations will be carried out by a single vessel. The proposed operations are planned to begin on the 11th June 2021 with an estimated duration of 18 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).

No significant cumulative impacts are expected to occur between this project and other existing projects.

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 PL22 pipeline connects the Inde 23A platform (UKCS Block 49/23) to the Lemn 27B platform (UKCS Block 49/27) in the southern North Sea, crossing UKCS Blocks 49/23, 49/27 and 49/28. At its closest point the PL22 pipeline is located approximately 54 kilometres (km) north-east from Bacton on the Norfolk coast and 32 km west of the UK / Netherlands median line. Water depths along the PL22 pipeline range from 12 metres (m) to 42 m and the seabed sediments are coarse sands with gravels. The faunal communities found in the area are those typically associated with sublittoral coarse sediment, sand, mud, and mixed sediments. Characterising species generally include the polychaetes *Ophelia borealis*, *Polycirrus*, *Lagis koreni*, *Scoloplos armiger* and *Nephtys cirrosa*, and the amphipod *Bathyporeia guilliamsoniana*. The whole area is faunally heterogeneous on a small spatial scale, and infaunal communities are similar between nearshore and offshore sandbanks, and between crest, flanks, and troughs.

The project location is within the marine protected areas; North Norfolk Sandbanks and Saturn Reef (NNS) Special Area of Conservation (SAC), with sub-tidal sandbank and biogenic reef features and the Southern North Sea SAC, designated for harbour porpoise.

No areas of *Sabellaria spinulosa* reefs were identified during the pipeline inspection surveys. In addition, the deposits will overlap the pipeline, therefore the potential impact on undisturbed sediments has been kept to a minimum.



Harbour porpoise and white-beaked dolphin have been sighted in the area. Harbour porpoise has been spotted in low densities in May, June and August. White-beaked dolphin has been spotted in low densities in May.

Grey and harbour seals are present off the east coast of England, particularly around The Wash where harbour seals forage over a wide area. Since the pipeline freespanns are located close to shore (approximately 10 km offshore), grey and harbour seals may be encountered from time to time.

The pipeline runs through the International Council for the Exploration of the Sea (ICES) Rectangle 35F2 in an area of spawning and nursery grounds for several commercially important species, including mackerel which has a high intensity of spawning in the area (in June and July).

The PL22 pipeline falls within the breeding season foraging ranges of several seabird species, including fulmar, gannet, herring gull, lesser black-backed gull, kittiwake, sandwich tern, common guillemot, razorbill and Atlantic puffin.

Oil and gas activity in the vicinity of the project is high and the Inde and Leman areas of the SNS have extensive oil and gas infrastructure. The closest offshore wind farm, North Vanguard West, is located approximately 12 km to the south west and is currently in the planning stage. Due to the proximity of key ports around the Norfolk and Lincolnshire coasts, the density of shipping traffic is high in the southern North Sea but low at the project location itself.

The nearest Royal Airforce Practice and Exercise Area (PEXA) is approximately 17 km north of the pipeline. It is not considered to be likely that this will be affected by the project. There are no active dredging or dredge disposal sites or charted wrecks. The PL22 pipeline crosses one active telecommunications cable, the 'NORSEA COMS' cable, at the north-western corner of UKCS Block 49/28.

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 physical presence of the single vessel involved 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 impacts are not considered to be significant.

The overall remediation programme has the potential for the deposit of up to 230 concrete mattresses and 22 RFUs along the pipeline. The worst-case seabed footprint from the proposed operations is 0.0014706 km², causing seabed disturbance and loss of soft sediment habitat. This is a conservative estimate as it assumes that all the deposit material will be used, including contingency amounts. This is a relatively small area compared to the wider southern North Sea with similar soft sediment habitat. The total area of impact within each marine protected area is 0.000684 km² for the North Norfolk Sandbank and Saturn Reef SAC; and 0.002925 km² for the Southern North Sea SAC, which equates to 0.0000190%, and 0.0000079% of the area of each MPA respectively.

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 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 or reef aggregations across the North Norfolk Sandbanks and Saturn Reef SAC. The structure and function of the sandbanks will also not be significantly adversely impacted by the pipeline deposit operations. The proposed placement of deposits is also not likely to significantly adversely impact harbour porpoise in the SNS SAC.

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.