

The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020

Regulation 14(3) Secretary of State Decision

Premier Oil UK Limited

Tolmount East Field Development

To: Jonathan Ward

Decision Recommendation:

That you agree, on behalf of the Secretary of State, to the grant of consent by the Oil and Gas Authority (OGA).

As set out further below, taking into account the relevant considerations, I have concluded that the project will not have any significant effects on the environment and therefore there is no requirement for conditions to be attached to the grant of consent.

From:

Environmental Manager

Date: 30 June 2021

ES Title: Tolmount East Field Development

Developer: Premier Oil UK Limited

Consultants: Xodus

OGA Field Group: Southern North Sea

ES Report No: D/4265/2021 **ES Submission Date:** 29 April 2021

Block No/s: 42/28d

Project Type: Field Development OGA Reference No: PCON/5799/0

Project Description

The Tolmount East development will be a side-tracked single well gas condensate tie back to the Tolmount platform located in the Southern North Sea, approximately 35 km from Flamborough Head and 152 km from the UK/Netherlands median line.

Tolmount East is a gas and condensate field which will be developed by side-tracking and recompleting an existing appraisal well as a production well. The well will be protected by an integrated wellhead protection structure (WHPS), a gravity based subsea manifold will contain any subsea control equipment.

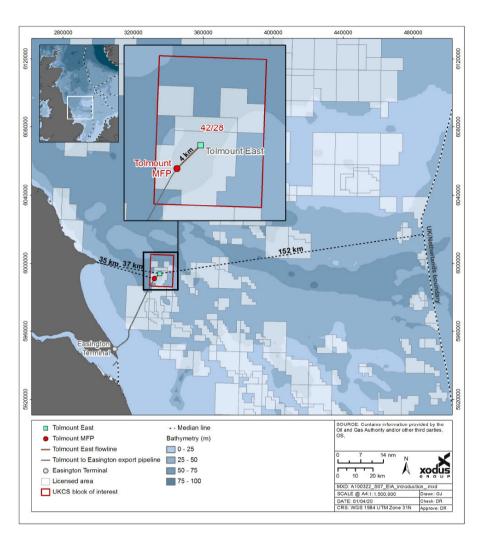


Figure 1 Tolmount East Development in the context of the wider Tolmount Area
Development

Gas, condensate and any produced water will be transported via a gravity based subsea manifold connecting to a new 4km long 12" flowline to the Tolmount Minimum Facilities Platform (MFP) where it will be comingled with hydrocarbons from the Tolmount field and exported to Easington Terminal via the existing Tolmount export pipeline. Power, chemicals and control will be provided by an umbilical piggy-backed onto the flowline. The project schedule indicates that construction works will take place from Q1 to Q3 2023 and first gas is expected by August 2023.

Key Environmental Impacts

The ES identified and discussed the following as having the potential to cause an environmental impact:

- Physical presence of temporary and permanent infrastructure
- Seabed disturbance
- Atmospheric emissions
- Discharges to sea

Accidental events.

Key Environmental Sensitivities

The ES identified the following environmental sensitivities:

- Fish and shellfish: The project area lies in an area of nursery grounds for cod, herring, lemon sole, whiting, blue whiting, mackerel, anglerfish, sandeel, spurdog and sprat and spawning grounds for cod, herring, lemon sole, plaice, sandeels and sprat. However, a herring spawning assessment for the Tolmount area concluded that the majority of sediments in the area had low herring spawning potential.
- Seabirds: Multiple species of seabird are known to occur in the project area with the
 most abundant being guillemot, black-legged kittiwake and auk species. Sensitivity of
 seabirds in the project area is generally high or very high throughout the year with
 exceptions in December and January where sensitivity is medium and low
 respectively.
- Protected habitats and species: There are a number Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) within 40 km of the project area, these are: the southern North Sea SAC 1.1km east of the project area; the Greater Wash SPA 27.1km west of the project and the Flamborough Head SAC 39km west of the project. The Holderness Offshore Marine Conservation Zone (MCZ) is approximately 11 km from the project area. There are no Annex I habitats in the project area.
- European Protected Species and pinnipeds: The SNS generally has a low density of marine mammals compared to CNS. Cetaceans such as harbour porpoise, white beaked dolphin and minke whale are likely to occur in the project area. Pinnipeds such as the grey seal and the harbour seal may occur in the project area in very low densities but are far more common close to shore.
- Other users of the sea: Commercial fishing effort in the project area has been assessed as "low" representing less than 1% of the total UK fishing effort. Fishing effort in the project area is distributed throughout the year dependent on tide and weather rather than season. The main species landed are shellfish, although demersal and pelagic fish species are also targeted to a lesser extent.

Shipping density in the area is high. There are 46 routes within a 10nm radius of the project location used on average by 21 vessels per day. There are several active oil and gas field in the vicinity of the project area. The closest platform is the Tolmount installation, situated approximately 4km to the east of the project location and there are several other oil and gas fields within 40km of the project area including Rough, Minerva, Ravenspurn and York. The project does not cross any cables or pipelines. The project area is not in the immediate vicinity of any military practice areas and no special conditions are required by MOD. There is one wreck approximately 280m northwest of the project location. The nearest aggregate extraction site is 44km away and the closest active windfarm is the Westermost Rough Offshore Windfarm which is 29km from the project area.

• In-combination, cumulative and transboundary sensitivities: The project has reduced in scale from the previous submission of the ES under the 1999 Regulations from 2 wells to one well and the manifold installation methodology has been revised to avoid piling. The installation of infrastructure (siting the WHP, manifold and associated 500 metre safety zone and 4km flowline) will reduce availability of natural environment to

activities such as fishing, but this will be offset by trenching and burying the pipeline where possible so that fishing activities can continue in those locations. No significant in-combination, cumulative or transboundary effects are anticipated as a result of the project.

Consultation with Other Authorities

The Joint Nature Conservation Committee, Ministry of Defence, Marine Management Organisation, Cefas and Maritime Coastal Agency were consulted on the application for consent and the ES submission. All the consultees submitted responses and none of consultees had objections to the environmental impact assessment.

Public Consultation(s)

The ES and the application for consent was subject to Public Notice, which was published on 6th May 2021 and ended on 5th June 2021. There were no public representations received.

Conclusion on the significant effect of the project on the environment

I have reviewed the following:

- The ES: and
- The representations received from other authorities as summarised above.

Taking those matters into account, I have concluded on behalf of the Secretary of State that this project will not have any significant effects on the environment:

- Physical presence of temporary and permanent infrastructure: There is no significant
 impact anticipated from the navigational hazards to other users of the sea given the
 very limited project area. The base case proposal is to trench and bury the pipeline
 (although a worst case rock dump scenario has also been considered) and the
 WHPS and manifold will be fishing friendly, the impacts to the fishing industry and
 other users of the sea in the area are not considered to be significant.
- Seabed disturbance: The worst-case permanent area of impact to the seabed is expected to be 0.066 km². The contributing factors to the permanently impacted area are subsea infrastructure and protection material (assessed as a contingency worst case). The impact to benthic habitats is not expected to be significant, changes to the baseline environment will take place but are not expected to cause degradation or impair the function or value of the receptor. A change in habitat type is likely from the installation of new infrastructure but the impact is not significant, given the comparatively small amount of available natural habitat being impacted.
- Emissions to air: Local air quality and global climate change were the primary
 receptors considered in relation to atmospheric emissions from the project.
 Atmospheric emissions from the project will be largely related to fuel consumption
 from the MODU, installation vessels and any flaring activities during well clean up.
 Quantities of greenhouse gas emissions associated with the project are very small
 compared to those of the wider industry and the UK in general. The impact to local air
 quality and climate change is not considered to be significant.
- Discharges to sea: There will be limited discharges to sea from the project as all

drilling mud and cutting will be skipped and shipped to shore for disposal and produced water will be exported onshore to Easington terminal. There will be minimal discharges of cement during drilling and discharges of chemicals during pipeline flooding, cleaning and hydrotesting. Water quality and marine organisms were identified as key receptors. As the impacts to water quality are likely to be localised and short term, and given the sensitivity of the area is low, the impact is assessed as negligible. The impacts to marine organisms are not significant, as the discharges are unlikely to be detectable above background levels and are expected to be reversable once the activities have ceased.

• Accidental events: Main scenarios of hydrocarbon spill considered in the analysis of accidental events are from loss of the pipeline inventory, loss of diesel inventory from the drill rig and a well blow-out. The environmental impact to water quality from a pipeline, well blow out or diesel release is assessed as not significant. The potential to cause significant adverse impacts is low and a well blow out is not predicted to result in a major environmental incident (MEI). The event would be highly unlikely taking into account the proposed suite of mitigation measures which will be in place.

Features of the project or measures envisaged to avoid, prevent, reduce or offset significant effects.

There are no features of the project or measures envisaged to avoid, prevent, reduce or offset any significant adverse effects on the environment.

Decision on Conditions to the agreement of the grant of consent

No conditions are attached to the agreement to the grant of consent.

Recommendation

I have set out above my conclusion on the significant effects of the project on the environment.

I recommend that the Secretary of State should agree to the grant of consent for this project because there are no significant effects on the environment.

Date 30/06/2021

Environmental Manager

Offshore Petroleum Regulator for Environment and Decommissioning
For and on behalf of the Secretary of State for Business, Energy, and Industrial Strategy

Agreement decision

I accept the recommendation for the reasons given.

On behalf of the Secretary of State, I therefore agree to the grant of consent.

Jonathan Ward

Date: 19 July 2021 Jonathan Ward

Director, Environmental Operations

Offshore Petroleum Regulator for Environment and Decommissioning
For and on behalf of the Secretary of State for Business, Energy, and Industrial Strategy.