

Our Ref: 01.01.01.01-4132U  
UKOP Doc Ref:1156975



Offshore Petroleum Regulator  
for Environment & Decommissioning

NEPTUNE E&P UK LIMITED  
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Registered No.: 01483021

Date: 30th August 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  
SEAGULL PIPELINES PL4891, PL4896 and  
ASSOCIATED SPOOLS & JUMPERS and UMBILICAL PLU4897 (2021 - 2022)**

A screening direction for the project detailed in your application, reference PL/2159/0 (Version 2), dated 26th August 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](mailto: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**

**SEAGULL PIPELINES PL4891, PL4896 and  
ASSOCIATED SPOOLS & JUMPERS and UMBILICAL PLU4897 (2021 - 2022)**

**PL/2159/0 (Version 2)**

Whereas NEPTUNE E&P UK LIMITED has made an application dated 26th August 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 PA/3601.

Effective Date: 30th August 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 1 September 2021 until 31 October 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](mailto:bst@beis.gov.uk)

#### **3 Nature of stabilisation or protection materials**

Deposits as per PL/2159 SAT under 'Deposit of Materials'.

The number of materials deposited should be the minimum required to provide the necessary protection and any surplus must be returned to land.

#### **4 Location of pipeline and stabilisation or protection materials**

Locations as detailed in PL/2159 SAT under 'Deposit of Materials'.

#### **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 Marine mammal mitigation measures - piling**

a) Piling must be undertaken in accordance with the relevant sections of the current Joint Nature Conservation Committee (JNCC) Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise. ([http://jncc.defra.gov.uk/pdf/JNCC\\_Guidelines\\_Piling%20protocol\\_August%202010.pdf](http://jncc.defra.gov.uk/pdf/JNCC_Guidelines_Piling%20protocol_August%202010.pdf))

b) Prior to the commencement of piling operations a 'pre-piling' marine mammal search must be undertaken, to determine whether any marine mammals are located within 500 metres (m) of the piling. It is recommended that the duration of the pre-shooting search must be at least 30 minutes.

c) Following completion of the pre-piling search, a 'soft start of the pile driver' must be undertaken, to reduce the possibility of causing injury to marine mammals. The duration of the soft start of the pile driver must be a minimum of 20 minutes. If any marine mammals are detected within 500m of the sound source during the pre-piling search, the soft start must be delayed until it has been confirmed that the marine mammals have moved out of the 500m zone.

d) The pre-piling search and soft start of pile driver should be timed to occur during hours of daylight/good visibility to allow a Marine Mammal Observer (MMO) to observe for any marine mammals within 500m of the sound source and if necessary delay the soft start if animals are detected within this zone.

c) If the pre-piling search and soft start of the pile driver cannot be timed to occur during daylight hours/good visibility, then consideration must be given to using a Passive Acoustic Monitor (PAM) system to allow effective mitigation during the hours of darkness/ periods of poor visibility.

d) As a minimum one dedicated MMO should be used. They should be fully trained and not have a dual role onboard (for example, in addition to being an MMO also work as a Fisheries Liaison Officer (FLO)).

e) At the end of the piling operations, a report of the visual and/or acoustic monitoring undertaken during the course of the piling must be completed and submitted by email to the Environmental Management Team Mailbox: [bst@beis.gov.uk](mailto:bst@beis.gov.uk), and copied to the JNCC general mailbox [OIA@jncc.gov.uk](mailto:OIA@jncc.gov.uk). The report must be compiled using the current JNCC Reporting Forms and must include the Department's reference number and the Marine Mammal Recording Form in its original format (i.e. as a Microsoft Excel spreadsheet and not converted to an Adobe Portable Document Format file). (Further information can be found in the JNCC guidelines). This report should detail the soft start procedures, any visual observations/PAM detections and any difficulties encountered, or recommendations that may be of use for future work should be included within the report.



## **8 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

## **9 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.

## **10 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.

## **11 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.

## **12 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).

## **13 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.

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## 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/2159/0 (Version 2)**

1. As per PL/1945, the Department would remind Neptune of the following commitment:

*Following the meeting held with consultees and relevant stakeholders on 28 July 2020, it was agreed that further information will be provided by Neptune E & P UK Limited following the trenching operation for the production and wash water pipelines, to confirm the presence or otherwise of any soil berms which may pose a risk to other sea users. We note that Neptune E & P UK Limited has agreed to share data following the post lay surveys with the Department and the Scottish Fishermens' Federation and should these identify any soil berms which are likely to present a risk, then further dialogue must be entered into with the Department regarding any proposed mitigation measures.*

We note that the trenching vessel will be utilised to review the berm situation and that this vessel is equipped with a full survey suite and is therefore suitable to carry out the workscope. Post-lay survey data and new data received from the new survey should be compared and communicated with the Department and the SFF accordingly.

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

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## **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, 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 Assessment Regulations 2020) (the Regulations);
- c) the results of any 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**

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:-

#### **Summary of the Project**

- Installation of 17.5 km umbilical, including trenching and backfilling;
- Installation of manifold (21 m x 10 m), including piling;
- Installation of associated spools and jumper bundles;
- Permanent deposits of rock, concrete mattresses, grout bags, sand bag and GRP covers;
- Temporary deposits associated with installation operations.

#### **Description of the Project**

The installation of a pipeline system (17.5 km umbilical, manifold, spools and jumper bundles, associated permanent and temporary deposits) at the Seagull field will be undertaken by seven vessels and is expected to take up to 128 days to complete between August 2021 and October 2022. This is in order to connect the Seagull development to the existing production platform which Seagull hydrocarbons will be



produced from. The installation of the remainder of the pipeline system (production pipeline, washwater line, umbilical, spools and jumper bundles, associated permanent and temporary deposits) was the subject of two directions given previously (references PL/1945/0 and DEP/1946/0) and has already been undertaken. To install the umbilical, it will first be laid on the seabed and then trenched using a cutting tool. The trench will be backfilled both naturally and by the cutting tool. A dredge pump will assist in redirecting excavated sediment back on top of the umbilical to provide cover. Spot rock deposits may be required at individual locations if the umbilical is not sufficiently covered following the trenching operation. In addition, deposits are required on approach to the production platform, at pipeline crossing locations and to protect associated spools and jumper bundles. The associated manifold will gather these spools and jumper bundles from each of the four Seagull well locations. The manifold will be installed with four corner piles by a vessel. The operations will be carried out by seven vessels, supported by a guard vessel. The pipeline system requires flushing, commissioning and testing once installed, which will involve chemical use and discharge. No associated flaring is required. Pollution and nuisances are restricted to power generation equipment onboard the vessels and chemicals.

Piling of the manifold has the potential to occur at the same time as unexploded ordnance clearance planned as part of a separate project 9 km to the south, therefore there is the potential for noise to be generated concurrently from the two activities. The piling operations are expected to be completed within a day and therefore any potential overlap leading to a cumulative impact on marine mammals would be of short duration. No significant cumulative impacts are expected to occur with any other existing or approved projects. The existing installation which the Seagull development is being tied-back to is located in the immediate vicinity.

The project is not at risk from natural disasters given its location in UK offshore waters, or unplanned major accident scenarios leading to an environmental incident. There is not considered to be any significant risk to human health.

### **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 approximately 211 km east from Aberdeen and 34 km west of the UK/Norwegian median line, in an area of the Central North Sea (CNS) where the water depth is approximately 93 metres (m). The surface current speed in the area is approximately 0.1 m/s and the wave height ranges from 2.1 - 2.4 m, which is typical of this area of the CNS. Site-specific surveys identified the seabed as flat and the sediment as comprising fine- to medium-grained sandy silt, with occasional cobbles and shell fragments. Samples taken during the surveys were classified as mud, sandy mud or slightly gravelly mud. A number of boulders were also recorded during the surveys, although the site-specific surveys concluded that the low number of cobbles would not class the area as a potential Annex I stony reef habitat. The



sediments indicated elevated hydrocarbon and metal concentrations across the site which is typical of the wider area which has been heavily developed for oil and gas. The faunal composition identified by the site surveys was typical of this area of the CNS. Both density and diversity of epifauna was classed as moderate. Seapens were recorded in notable densities, along with burrowing megafauna such as Norway lobster and shrimp species. Ocean quahog juveniles were present during sampling, although no adult individuals were identified.

The project is not located in any protected areas. The closest protected area is the East of Gannet and Montrose Fields 3 km to the west. The project is located in an area of considerable oil and gas development. There are no wrecks or telecommunication cables in the area and the project is not located within an area of military activity.

The project will take place during spawning seasons for cod, lemon sole, mackerel, Norway pout, Norway lobster and sandeel and within the nursery area of several fish species. Several cetacean species have been recorded during the period in which the project works are planned. Seabird abundance is low for the period in which the project works are planned. The area is described as a low intensity fishing area and fishing effort is predominantly focussed on demersal and shellfish species.

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 effects on the environment from the activities associated with the project were assessed, including impacts arising from atmospheric emissions, seabed disturbance, physical presence, planned discharges and noise. Other than the matters considered further below, there is not likely to be any significant impact of the project on population and human health.

Power generation on board the support vessels will generate atmospheric emissions which are expected to result in a short-term deterioration in air quality in the immediate area. This localised effect is expected to be temporary given the meteorological conditions at the offshore location. The installation activities are expected to take up to 128 days which represents a contribution of 0.01% to the total mass of CO<sub>2</sub> generated from UK offshore activities in 2018. The impacts arising from atmospheric emissions on local air quality and climate are not considered to be significant.

Seabed disturbance from the installation activities is estimated to impact a total area of 393,737 m<sup>2</sup>. This is likely to result in displacement or mortality of sedentary organisms along with resuspension of sediment. The infrastructure and associated deposits will also result in the introduction of a new hard substrata not normally present in the area. The new stable hard substrata is expected to be colonised over



time by various species of epifauna, as has been reported at other sites of oil and gas development. Studies indicate that faunal recovery is likely following seabed disturbance in this type of muddy or sandy seabed. Individual epifauna may be impacted by sediment re-suspension from the trenching of the umbilical, although the potential impacts have been found to be short-term only, generally between a few days to a few weeks. Infauna are less vulnerable to sediment resuspension. Seapens, burrowing megafauna and ocean quahog are sensitive to seabed disturbance; however, although there is the potential for individuals to be impacted there are not expected to be any effects at the population level. Spot rock deposits will only be required if boulders are encountered during trenching (which would prevent the cutting tool from reaching the required depth), in which case any rock deposits will be limited to discrete locations and the minimum length required, allowing megafauna to recolonise nearby areas of sediment within the trench. The potential impacts will not extend to any protected sites. The ecological impact from the project is not expected to be identifiable given the wider area of similar natural seabed environment available. Seabed disturbance from the installation activities are not considered likely to have a significant impact.

The installation activities will take place partly within two existing 500 m radius safety zones, which exclude the unauthorised access of vessels. This prohibits access to fishing and shipping vessels. Some of the installation activities will extend beyond these existing safety zones, although the wider area is described as a low intensity fishing area and the Developer will undertake notification of and communications with other marine users of the vessels' presence. A guard vessel will be present throughout the installation activities. The physical presence of the vessels are not considered likely to have a significant impact.

Discharge of chemicals associated with the installation activities have been assessed and found not to have a significant impact on the environment. The marine environment is expected to rapidly disperse and dilute chemical discharges.

The installation activities will generate underwater noise through vessel engine use (continuous) and piling of the manifold (expected to take one day). Noise associated with vessel use is not considered likely to have a significant impact. An assessment of the noise associated with the piling was undertaken and the mitigation measures the Developer has in place mean that the underwater noise generated is not considered likely to have a significant impact. Piling has the potential to occur at the same time as unexploded ordnance clearance planned as part of a separate project 9 km to the south, therefore there is the potential for noise to be generated concurrently. Piling is expected to be completed within a day and therefore any potential overlap leading to a cumulative impact on marine mammals would be of short duration. Cumulative impacts from underwater noise are not considered likely to be significant.

There are no expected transboundary impacts as a result of the project and no additional 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:

Not applicable.