

Our Ref: 01.01.01.01-4682U
UKOP Doc Ref:1162520



Offshore Petroleum Regulator
for Environment & Decommissioning

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Date: 29th September 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**

Modification of Thames Pipeline PL370

I refer to your amended application dated 17th September 2021, reference PL/2126/1 (Version 1).

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**

Modification of Thames Pipeline PL370

PL/2126/1 (Version 1)

Whereas ODE ASSET MANAGEMENT LIMITED has made an application dated 17th September 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: 29th September 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 27 July 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

Grout bags deposits

69 x 1 tonne of grout contained within 40 x 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).

Concrete mattress deposits

50 [Number] concrete mattresses, each measuring 6 metres x 3 metres x 0.15 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).

Froned mattress deposits

13 [Number] froned mattresses, each measuring 6 metres x 3 metres x 1 metre. (The number of mattresses deposited should be the minimum required to provide the necessary protection, and any surplus mattresses must be returned to land).

OR

Rock bag deposits

200 tonnes of rock contained within x 100 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

As detailed in the relevant 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 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.

8 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.

9 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.

10 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).

11 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:

Froned Mattresses - Due to the introduction of a plastic material into the marine environment, ALL froned mattresses MUST be removed at the time of decommissioning if not sooner.

Rock Bag Deposits - Due to the introduction of a plastic material into the marine environment, ALL rock bags MUST be removed at the time of decommissioning if not sooner.

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

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.

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

This post screening direction amendment (ref PL/2126/1) relates to a change to the project for which a screening direction was previously issued.

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:

Outline of project

To extend the permit duration from 30th September 2021 to 31st January 2022.

The pipeline operations consist of the modification of the existing Thames pipeline PL370 by excavating an area of the seabed to uncover and cut a 100 metre (m) section of PL370; installation of new infrastructure including a 24" valve skid, a mechanical connector and a 24" spool; deposit of support materials including mattresses and grout bags and the temporary placement of ancillary equipment on the seabed. When all modifications are complete, the pipeline will be renumbered PL5079.

Description of project



The existing Thames pipeline PL370 runs from the onshore Bacton gas terminal on the Norfolk coast to Block 48/29 on the United Kingdom Continental Shelf (UKCS). ODEAM intends to re-use this pipeline to tie-in to the new Blythe export pipeline PL4956 (permitted under PLA/768) which will allow export of hydrocarbons from the Blythe field. Application PL/2126/0 covers modifications of PL370 to facilitate this. A 120m section of PL370 will be excavated using a mass flow excavator to expose the pipeline. A 100 m section of the PL370 will then be removed (works to be consented under Oil and Gas Authority (OGA) applications PA/3473 and PA/3512) and a new 24" valve skid installed and connected to the Bacton section of PL370 using a 24" spool (works to be consented under OGA applications PA/3476 and PA/3514). Protection and stabilisation material will be required in the form of 50 x grout bags to support the cut pipeline ends, and 25 x concrete mattresses to be laid across the exposed pipeline ends for protection (covered under OGA application PA/3512), 19 x grout bags will be also be used to support the spool, and 25 x concrete mattresses will be laid across the spool for protection, 13 x fronded mattresses or 100 x individual rock bags will be placed around the skirt of the valve skid to mitigate against the effects of scour (covered under OGA application PA/3514). All deposits are listed as temporary, to cover temporary placement on the seabed immediately prior to use, and permanent to cover their permanent placement in their final positions.

The new export system will then be leak tested, dewatered and conditioned in readiness for future gas export. When the section of the Thames pipeline from Bacton to the newly installed 24" valve skid is put into use, it will be given the new pipeline number PL5079.

The proposed operations were planned to commence on 27th July 2021 with operations estimated to take 29 days to complete. In order to account for any unforeseen operational or weather delays, the permit was originally requested to expire on 30th September 2021 and has now been extended to 31st January 2022.

The risk of an unplanned diesel release from the vessels involved with the operations has been assessed. The developer has control measures in place to reduce the risk of an unplanned release occurring and the probability of such an event occurring is very low. No cumulative impacts are expected to occur with any other existing or approved 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 project area is located in Block 48/29 in the southern North Sea (SNS) in an approximate water depth of 23 metres (m), approximately 28km east from the UK coastline and 94km west of the UK/Netherlands median line. The project area is not



located within any protected areas but within 40km of the following:

Haisborough, Hammond and Winterton SAC, located 4km southeast.

Southern North Sea SAC, 4km northeast.

North Norfolk Sandbanks and Saturn Reef SAC located 12km northeast.

Greater Wash SPA located 14km southwest.

The project is in an area characterised by sand and muddy sand with surveys showing circalittoral coarse sediment of gravelly sand with shell fragments with mobile bed forms (sand waves and mega-ripples) typical of the area located near Annex I designated sandbanks. The quantitative assessment of seabed imagery obtained during the Blythe to Bacton pipeline survey indicated that the species abundance and diversity were typical of the SNS. Benthic communities within sandy mobile sediments of the SNS are typically low in both numbers of taxa and individuals and dominated by species adapted to a degree of physical disturbance associated with tidal movement and wave action. Broken Sabellaria spinulosa tubes were collected in a few grab samples within the survey area but no intact Sabellaria spinulosa tubes were evident from the video analysis and Annex I Sabellaria spinulosa reef is not known to be present in Block 48/29.

Species diversity along the pipeline route was moderate to high with high variability for macrofauna and a community typical of physical disturbance in a dynamic seabed environment. Herring spawning analysis was undertaken and sediment was found to be unsuitable. Mackerel (a priority marine species) and sole spawning may be spawning, and the area is a nursery area for several species however the project is highly localised and unlikely to impact fish. The fishing effort in the area (ICES 35F1) is rated low principally targeting shellfish.

Atlantic white-beaked dolphin, harbour porpoise and Atlantic white-sided dolphin have been recorded in the vicinity. Densities of these species range from high to low throughout the year. Common and grey seal feed in the SNS and will occur 29km offshore in densities of 1-5 harbour and 0-1 grey seals per 25km² but concentrate near shore, particularly during pupping and moulting season.

Seabird vulnerability is low to extremely high during the construction period of July to January with regard to potential diesel spill from vessels. Shipping density in the area is high near Blythe due to construction of Dudgeon offshore windfarm and at Southwark servicing Leman platform using traffic routes with some fishing vessel activity also. The project location is within the East Offshore Marine Plan area, the nearest wreck is 4km southwest, aggregate licence 15km northeast and offshore wind lease at Dudgeon 23km northwest of the project area.

Given the location of the project, it is not likely that the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) or (viii) of Schedule 5 to the Regulations will 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 marine discharges, atmospheric emissions, physical presence, seabed disturbance, noise, accidental spills and cumulative impacts. 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 re-commissioning of the Thames pipeline PL370 will occur outside any 500m statutory safety zone, but fishing intensity is low. Communications will be required with shipping with vessel traffic surveys indicating high levels in the area, particularly those passing in proximity to the work. The works are of short duration, standard vessel markings apply and there are no navigational concerns, and no objections were received from the navigational consultees.

Four vessels are involved in re-commissioning PL370 which generate atmospheric emissions impacting climate, but the emissions will be rapidly dispersed in air and not likely to have a significant impact.

The cetacean density during the operational period (July to January), are low for Atlantic white-beaked dolphin, low to high for and harbour porpoise and moderate to low for white beaked dolphin. The proposed operations are unlikely to have a significant impact on these species. Given the density of seals 29km from shore, they are not likely to be encountered regularly. Any noise generated during operations is expected to be within local background vessel levels.

Broken Sabellaria spinulosa tubes were collected in a few grab samples within the survey area but no intact Sabellaria spinulosa tubes were evident from the video analysis. The interactive Marine Management Organisation map shows that it is unlikely S. spinulosa 'reef' will occur in the area which was not surveyed. The nearest Annex I habitat 'sandbanks which are slightly covered by seawater all of the time' is 4km from the location (see previous protected site distances).

The removal of 100m of the Thames to Bacton pipeline (PL370), the near shore attachment of a mechanical connector, the installation of a 24" spool and a 24" valve skid with temporary deposits to enable installation including: a mass flow excavator, dredging to gain access to cutting tools, baskets to remove pipeline sections, transponders to accurately position assets on the seabed along with rigging equipment, clump weights for diver support and other temporary deposits as well as permanent deposits to stabilise and protect the valve skid, spool and pipeline including concrete mattresses, grout bags, fronded mattresses and rock bags will be used in a relatively confined area with re-suspended sediment unlikely to add to naturally occurring mobile seabed impacts upon the benthic environment.

The worst-case temporary direct impact footprint is 0.00331 km² (including



temporary deposits and ancillary equipment, that will be recovered on completion of the operations) and the worst-case temporary indirect impact footprint is 0.000720 km², therefore the total combined area of temporary impact is 0.00403 km². The worst-case permanent direct impact footprint will be 0.00138 km². There will be no likely significant effect associated with this work involving excavation, dredging, temporary placement of tools and equipment and permanent stabilisation deposits.

Chemicals will be discharged when the Thames pipeline is cut (inhibited seawater), leak tested, flooding the spool to install and de-watering the system. The remaining cut end of the Thames pipeline nearest Blythe will be left with a bung pending connection to the Blythe export pipeline. The use and discharge of chemicals have been assessed and are not considered to have a likely significant effect on the environment. There are no changes to the chemical quantities required.

There are no expected transboundary effects from the change to operations due to the localised and temporary nature of the work and the 94km distance from the UK/Netherlands median line. It is not considered likely that any planned operational discharge will be detectable at this distance from the project location.

Although not a planned activity, an unplanned release of diesel from a vessel has been assessed and a Shipboard Oil Pollution Emergency Plan is in place with mitigation and control measures in place to prevent this. The proposed operations carried out as planned are not likely to have a significant effect on the environment and the probability of an unplanned release from the proposed operations is low. The work is in proximity to IOG pipelay of the new gas pipeline between Blythe platform and Elgood subsea well and associated service umbilical, Blythe export gas pipeline to link with this project to enable exported gas to Bacton onshore terminal, drilling of the Elgood subsea well, 10km from Hornsea 3 offshore wind farm (consented), 23km from Dudgeon offshore wind farm (operational) and more than 25km from Leman and Vulcan but it is not considered to have any significant in-combination impacts.

There are no military practice sites, the nearest wreck is 4km southwest, the nearest aggregate site is 15km northeast sites and the operations are in accordance with the East Offshore Marine Plan's objectives and policies.

It is considered that the re-commissioning of the Thames export route to Bacton onshore gas terminal with removal of 100m of PL370 to enable link up to a 24" spool and a 24" valve skid to enable tie in of the Blythe gas export pipeline (PL370 to be renamed Blythe PL5079 pipeline) with associated impacts is not likely to have a significant impact on other offshore activities or other users of the sea and no cumulative impacts are expected to occur as a result of the change to the project.

Decision

Taking the above considerations into account, the Secretary of State has concluded that the change to 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:

N/A