



Offshore Petroleum Regulator
for Environment & Decommissioning

D/4257/2020

IOG UK Ltd
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**Department for
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Dear [REDACTED]

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

NOTICE PURSUANT TO REGULATION 12(1)

Southwark Pipeline Installation Project

The Offshore Petroleum Regulator for Environment and Decommissioning (“OPRED”) acting on behalf of the Secretary of State for Business, Energy and Industrial Strategy (“the Secretary of State”) is currently considering the Environmental Statement (“ES”) in relation to the above project. IOG UK Ltd (“IOG”) is hereby required to provide further information in relation to the following:

1. The corresponding Application for Consent, the Pipeline Works Authorisation (PWA) reference number PA/3497 has been applied for under the name IOG Southern North Sea Limited, however this Environmental Statement has been submitted under the name IOG UK Limited. Please expand further.
2. Page 3-21. Section 3.4 Pipeline tie-in and commissioning, page 5-6 Section 5.4.1.3 Pipeline installation and tie-in. Please confirm that 200 concrete mattresses and up to 1450 grout/sand bags ‘at each’ location i.e. 2900 grout/sand bags is still confirmed as the worst case scenario? In addition, please also confirm that the grout/sand bags will be biodegradable.
3. Please confirm that the proposed mattresses will be concrete as opposed to fronded i.e. not introducing plastic to the marine environment

4. P2-17. Section 2.7. It is not clear why the method of Controlled Flow Excavation (CFE) has still been included as a potential option when the conclusion that options 6F Trailing Suction Hopper Dredging + Plough and 6I Seabed Excavator + Plough are the Best Practical Environmental Option (BPEO). Further explanation or an update to the latest conclusion of recent engineering studies would be beneficial.
5. Page 3-14. Section 3.2.2.3 demonstrates different calculations assessing the potential impacts from the anchors, chains and scour. Section 3.5.1 Contingency remedial works Table 3-5 Proposed Development seabed footprint illustrates the overall seabed footprint stating that the footprint associated with 'anchoring' is 1,015 m². Please confirm that the worst case potential impact has been assessed, in addition to providing clear and transparent information on how the total footprint from the anchors, chains and scour has been calculated.
6. 5.5.1. Generation of atmospheric emissions. Emissions will arise from pipeline installation and during remedial operations. Please advise what IOG mean by 'remedial' operations.
7. Page 5-23. Section 5.5.1.1. The figure 57,389 tonnes carbon dioxide equivalent (CO₂-e) is presented in the body of the text in relation to CO₂e released from the proposed project, however this quantity appears to be different to that of the totals presented in Table 5-9.
8. Page 5-22. Section 5.4.4. The information presented in this section is conflicting. It states that "...the area within the Proposed Development has been considered as "unsuitable" for herring spawning habitat...", however Table 4-6 suggests that sandeels spawn within the project location.
9. Will any backgassing of any gases, such as nitrogen, in the pipeline be required prior to commissioning the pipeline?

Note for future

Seabird Oil Sensitivity Index Table 4.7 is incorrect. Block 48/25 for May and June should be high and low respectively. Block 53/2 in June, August, October and November should be high, low, medium and medium respectively. Block 49/26, August and December should be low and very high respectively. The following method is recommended

<http://jncc.defra.gov.uk/PDF/Using%20the%20SOSI%20to%20inform%20contingency%20planning%202017.pdf>

Your response will be reviewed, and consideration given as to whether the information provided ought to be made public because the information is directly relevant to reaching a conclusion on whether the project is likely to have a significant effect on the environment. If so, OPRED will notify IOG UK Limited Energy under Regulation 12(3),

and IOG UK Ltd will have to take further steps to publish information and make provision for further public consultation under Regulations 12(5) to 12(9).

The Department looks forward to receiving your response so that we can progress our consideration of the ES.

Yours sincerely

For and on behalf of the Secretary of State

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[Redacted]

[Redacted]

The Offshore Petroleum Regulator for Environment and Decommissioning
The Department for Business Enterprise and Industrial Strategy
Authorised to act in that behalf