

Our Ref: 01.01.01.01-4766U
UKOP Doc Ref:1191515



Offshore Petroleum Regulator
for Environment & Decommissioning

DANA PETROLEUM LIMITED
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Registered No.: 03456891

Date: 23rd February 2022

Department for Business, Energy
& Industrial Strategy

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Aberdeen
AB10 1BJ

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www.gov.uk/beis
bst@beis.gov.uk

Dear Sir / Madam

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

**Upheaval buckling remediation for the replacement P1 flexible pipeline
(PL1652) in the Greater Guillemot Area**

I refer to your amended application dated 21st February 2022, reference PL/2148/1 (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**

**Upheaval buckling remediation for the replacement P1 flexible pipeline
(PL1652) in the Greater Guillemot Area**

PL/2148/1 (Version 1)

Whereas DANA PETROLEUM LIMITED has made an application dated 21st February 2022, 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: 23rd February 2022



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 October 2021 until 31 July 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

Rock deposits

21,131 tonnes of clean, inert rock material, containing minimal fines, (The quantity of rock deposited should be the minimum required to provide the necessary stabilisation or protection, and any surplus rock must be returned to land).

4 Location of pipeline and stabilisation or protection materials

Within an area bounded by the coordinates;

57 Degrees 11 Minutes 15.01 Seconds NORTH;

0 Degrees 44 Minutes 21.49 Seconds EAST and

57 Degrees 10 Minutes 26.39 Seconds NORTH

0 Degrees 46 Minutes 45.24 Seconds EAST

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.

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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:

There are no comments 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]

Fax [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

This provides a summary of the assessments undertaken by OPRED (Offshore Petroleum Regulator for Environment and Decommissioning) 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

Upheaval buckling analysis of the P1 flexible production pipeline in the Guillemot West field has concluded that remedial rock dumping is required along various sections of the length of the pipeline, totalling 1.252km. This is required in order to prevent future upheaval buckling of the pipeline once it is in operation as there are locations identified where the pipeline is likely to deform or buckle out-with the trench due to either lack of natural backfill or vertical imperfections within the trench. A maximum of 21,131 tonnes of rock is required for stabilisation and will be deposited by a flexible fall pipe vessel as per PWA reference:30/W/98.

Description of project



Installation of the replacement P1 12" flexible production pipeline (PL1652) in the Guillemot West field was undertaken in 2020. The pipeline was flooded, pressurised and then jet trenched into the seabed during that campaign. A maximum of 21,131 tonnes of rock is required for stabilisation along the P1 flexible production pipeline, following upheaval buckling analysis. Rock will be spot-placed in up to 30 pre-identified locations along 1,252m of the pipeline in varying berm sizes by the Flexible Fall Pipe Vessel, FFPV Stornes, changed to FFPV Nordnes (21st February 2022) an almost identical vessel with no change to fuel/ emissions.

The total length of the pipeline is 2,903m and it is laid between the DC1 and DC2 manifolds, which are each subject to a designated 500m safety zone.

The typical width of the rock berms is approx. 6.5m (3.25m either side of the pipeline), designed with 1:3 slopes (as per industry standard) to ensure that it provides a suitable profile for over-fishing. When the rock is installed, dedicated survey profilers will be used to continually monitor the rock profile to ensure it meets the design requirements. The nearest existing pipeline is 30m away, so there will be no interaction with other stabilisation materials

The operations will be performed from Flexible Fall Pipe Vessel, FFPV Nordnes (previously FFPV Stornes). The anticipated start date is 1st October 2021. Operations are expected to take 4.5 days to complete. Deposits will be made within a 10-month window from October 2021 to July 2022. This application includes deposits outlined in OGA consent PA/3588.

The risk of an unplanned diesel release from the vessels involved with the operations has been assessed. The P1 pipeline is currently filled with seawater. However, the potential for a major accident that could occur from the accidental rupturing of a live line in the vicinity of the P1 pipeline or spillages from the FFPV was considered. The FFPV can install rock to a tolerance of +/- 0.2m, with the closest pipeline being 30m away from the P1. 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 highly unlikely.

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. Other than the matters considered further below, there is not likely to be any significant impact of the project on population and human health.

Tie-in activities of the flexible pipeline will be carried out in July 2022, independent of this operation.

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 pipeline project area is located in the Guillemot West Field, which is within the Greater Guillemot Area (GGA) in UK Continental Shelf (UKCS) Block 21/24 in the central North Sea (CNS). The area is located 154 km east of Aberdeen, 91 km west of the UK/Norwegian median line.

The project area is not located within any protected areas. The closest SAC to the proposed operations is the Scanner Pockmark Special Protected Area (SAC), which is located approximately 122 km to the north. The closest offshore Nature Conservation Marine Protected Area (NC MPA) to the proposed operations is the East of Gannet and Montrose NC MPA, located approximately 4 km to the northeast.

Recent environmental baseline survey data (September 2014) of the Greater Guillemot Area (GGA), recorded water depth ranging between 84-98 m. The National Marine Plan Interactive (NMPi) reports the Guillemot West field substrate to generally consist of "muddy sand". However, the more detailed area surveyed was classified as silty sand, fine sand, or silty clayey sand.

The broad scale benthic habitat across the GGA has been classified as "Offshore circalittoral sand". The Priority Marine Feature (PMF) seabed features; 'burrowed mud', 'seapens and burrowing megafauna in circalittoral fine mud', 'deep sea sponge aggregations', 'Northern sea fan and sponge communities', 'offshore deep-sea muds', 'offshore subtidal sands and gravels' and ocean quahog (*Arctica islandica*), are known to occur within the wider CNS area. However, of these features, 'offshore subtidal sands and gravels' and ocean quahog are recorded as occurring at GGA, although in very low numbers. Ocean quahog is also an OSPAR listed species as threatened and is known for its slow growth rate and long lifespan. Although sea pens were recorded in photographs and in grab samples, their numbers were very low. In addition, the sediments across the survey area were fine or very fine sand; therefore, the seabed here does not correspond with the 'plains of fine mud' defined by OSPAR (2010) as the habitat for the threatened/declining feature sea pens and burrowing megafauna. No evidence of Annex I habitats or communities of conservation value were recorded.

From recent survey data of the area, polychaetes accounted for approximately 50% of the taxa encountered which is broadly similar to those encountered previously in the region. The polychaete *Scoloplos armiger* was the dominant taxon at seven stations sampled, *Paramphinome jeffreysii* at six stations and *Spiophanes bombyx* at three. Other common taxa across the majority of the survey area included the polychaetes *Galathowenia oculata* and *Owenia borealis* (previously *Owenia fusiformis*), the brittle star *Amphiura filiformis* and the bivalve mollusc *Thyasira flexuosa* . Fauna observed during seabed photography included the sea pen *Pennatula phosphorea* , the white curved tubes of dead *Ditrupa* sp. (a serpulid polychaete) at a few stations and starfish Asteroidea. The taxa identified were similar to those identified during the previous survey in 2005.



The proposed location is located in International Council for the Exploration of the Sea (ICES) Rectangle 43F0. Contributions from ICES 43F0 to the UK landings are small in UK total landed value and in terms of the total landed weight. Both the landings live weight and value for ICES rectangle 43F0 were below average. Fishing occurs all year round in ICES rectangle 43F0 although effort is low, in comparison to other North Sea areas the rectangle makes up 0.06% of the UK total fishing effort.

Fish spawning and nursery activity is reported in the area, which may coincide with the operations. However, studies report that the operational area is located in a "rare" and "occasional" cod spawning area, whilst seabed surveys in this area observed no Nephrops or burrows, indicating that it is not expected that the area is a particularly important area for Nephrops spawning. The area of the proposed operations is unlikely to be suitable for sandeels due to the relatively high silt-fraction which is unfavourable to sandeels, given the silt component of the sediment surveyed in the area.

Harbour porpoise, minke whale, Atlantic white-sided dolphin and white-beaked dolphin have been recorded in the vicinity of the proposed operations. Densities of these species are low throughout the year. All species are all listed as Priority Marine Features. Since the proposed operations are located approximately 154 km offshore, grey and harbour seals may be encountered from time to time but it is not likely that they use the area with any regularity or in great numbers.

Seabird vulnerability is recorded as low throughout the year for Block 21/24. In addition, the proposed operation is located approximately 154 km from the UK coastline and are therefore remote from sensitive seabird breeding areas on the coast.

The proposed operations are located in an area that experiences very low shipping intensity. Vessel traffic is generally in the form of support vessels, principally operating from Peterhead, Aberdeen, Montrose and Dundee in the north. There are no military restrictions on Blocks 21/24 and there are no known military activities within the area. There are no cables in the immediate vicinity of the proposed operations. There are 24 non-dangerous wrecks within 40 km of the proposed operations. The closest wreck is approximately 1.4 km to the southwest of the proposed pipeline location. The nearest draft Sectorial Marine Plan for Offshore Wind Energy area E2, approximately 16 km to the west of the block 21/24.

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 atmospheric emissions, seabed



disturbance, physical presence of a vessel on location, seabed disturbance, planned discharges and accidental spills.

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 worst-case seabed footprint from the proposed operations is 0.0203 km². The placement of the deposits on the seabed will result in direct physical impact to benthic habitats and species within the immediate footprint of the operation. Any extended area affected by localised resettlement and potential smothering is expected to be limited to the immediate vicinity of the project area and controlled placement of rock will help to ensure that volume of resuspended sediment is minimised. This area of seabed affected by sediment resettlement is expected to fully recover. The seabed is inhabited by numerous organisms, including sessile species and animals that are unable to move rapidly or over large distances. The area of seabed directly affected is very small and represents a small area of the similar habitat available in this region of the North Sea and therefore the impacts are not considered to be significant.

The physical presence of the single vessel involved will not have an exclusion area, however, the vessel will be subject to standard navigational provisions and able to move away in an emergency. The project is in a low-level fishing area and so the impact to other users of the sea is not expected to be significant. Due to the very low levels of shipping in the area and the wide expanses of water available for navigation, it is not expected that there will be any significant navigational concerns. The design of the rock berms ensures that fishing activity is not affected by the rock berms and fishing activity can continue in the area as normal. There is no interaction with this line and existing rock-dumped lines and therefore no additional risk to trawling activity. Measures will be in place for standard communication practices and notifications during the short duration of activity. The proposed operations will be localised in extent and timing and so the loss of access to other sea users (including fishermen) is therefore likely to be negligible during this period.

Prevailing conditions in the area are expected to result in rapid dispersion of atmospheric emissions from power generation by the vessel. It is therefore expected that the emissions are not likely to have a significant impact.

Densities of the cetacean species noted in the area are low throughout the year. Since the proposed operations are located approximately 154 km offshore, grey and harbour seals may be encountered from time to time but it is not likely that they use the area with any regularity or in great numbers. Due to the distance of the operational area from shore and the low densities encountered, none of these species are considered to be adversely affected by the proposed operations. Any noise generated during operations is expected to be within local background levels. Noise impacts are not therefore considered to be significant.

The broad scale benthic habitat across the GGA has been classified as "Offshore circalittoral sand". Priority Marine Feature (PMF) seabed features are present in the



area but occur within the wider CNS area. Ocean quahog are recorded in the project area in very low numbers. Although sea pens were recorded, their numbers were very low and the sediments across the survey area do not correspond with the 'plains of fine mud' defined as the habitat for the threatened/declining feature sea pens and burrowing megafauna. No evidence of Annex I habitats or communities of conservation value were recorded.

No chemicals use or discharge is associated with the operations and so there is no risk from chemicals to the marine environment.

Although not a planned activity, an unplanned release of diesel from a vessel was assessed. The developer has 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.

No planned construction operations, no aggregate dredging, military practice sites, sites of marine archaeological interests or aquaculture sites were reported within the vicinity of the proposed operations.

No objections were received from the consultees for the proposed operations. It is considered that the proposed operations to deposit a maximum of 21,131 tonnes at specified locations along the PL1652 P1 flexible production pipeline is not likely to have a significant impact. There will be no impact cumulatively with other activities or other users of the sea and no cumulative impacts are expected to occur.

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