

Our Ref: 01.01.01.01-5071U
UKOP Doc Ref:1206649



Offshore Petroleum Regulator
for Environment & Decommissioning

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Date: 24th May 2022

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Dear Sir / Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020
NORPIPE WORKS - JUDY EXPORT LINE PL998**

Your application reference PL/2237/1 (Version 1), dated 10th May 2022 requested a screening direction for the above project.

The Department has considered that application and decided that a screening direction will not be issued. The attached comments set out the main reasons why a screening direction has not been issued. A copy of this notification 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 notification 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

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COMMENTS ON THE APPLICATION FOR SCREENING DIRECTION

This application cannot currently be reviewed as it appears to be incomplete:

- The EAJ document revision appears to be unfinished. Please revisit page 63/64 in particular which include the statements ' *Rock quantity required . . . Table below summarises emissions . . . Impact area and effect. (justification for volumes, contingency) show maps of the works . . . Vessel/s (rock lay technique, accuracy, reference previous, emissions summary)* ', but does not actually include any of this information.
- Please remove highlighting from previously approved applications (i.e PL/2237) from the document to integrate this into the text so that the current highlighting clearly shows the scope of this application/variation.
- The quantity of rock requested in the associated consent application (PWA/DepCon) is 636 tonnes (Area 1) + 450 tonnes (Area 1 extension) + 432 tonnes (Area 2) = 1,518 tonnes including contingency, whereas this screening direction application requests 2,400 tonnes.
- The diagram provided in the PWA/DepCon is more helpful as this indicates the two rock deposit areas including the potential extension. Figure 7.1.2 3 in the EAJ document appears to show three separate areas of rock deposit. Is this an old figure?
- The coordinates for rock deposits provided in the SAT do not match any of those within the PWA/DepCon application.
- The end date in the PWA/DepCon application exceeds that requested in the screening direction application.
- Will the rock to be deposited be taken from the relocation areas (i.e. that was previously protecting the pipeline) or is it 'new' rock? If the latter, why can the original rock not be reused?
- The atmospheric emissions impact assessment is not clear enough to follow. Earlier text states 'The vessel is expected to have 16 hours sailing time (to location and same away) and then 12 hours execution time on location and 3 hours loading time'. How has this been taken into account on page 69? Is the total diesel use of 49.44 tonnes the total for the operation? The sum of the stages listed (loading rock, transit, on location) is 54.6 tonnes rather than 49.44.
- The paragraph added to the end of the conclusions mentions the subsea excavator 'for these works' (in new blue highlight). The subsea excavator was used to move the rock initially, but is it involved in the subject of this screening direction (variation) for rock deposits? If so, this is the first mention.