Our Ref: 01.01.01.01-5158U UKOP Doc Ref:1207699

Offshore Petroleum Regulator for Environment & Decommissioning

CONOCOPHILLIPS SKANDINAVIA AS EKOFISKVEGEN 35 4056 TANANGER NORWAY

Date: 31st May 2022

Department for Business, Energy & Industrial Strategy

AB1 Building Crimon Place Aberdeen AB10 1BJ



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 PIPELINE PL19: REPLACEMENT VALVE AND PROTECTION STRUCTURE & ASSOCIATED DEPOSITS NORPIPE WYE

A screening direction for the project detailed in your application, reference PL/2259/0 (Version 2), dated 30th May 2022 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 **Content on Content** 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

PIPELINE PL19: REPLACEMENT VALVE AND PROTECTION STRUCTURE & ASSOCIATED DEPOSITS NORPIPE WYE

PL/2259/0 (Version 2)

Whereas CONOCOPHILLIPS SKANDINAVIA AS has made an application dated 30th May 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 agreement to the Oil and Gas Authority to the grant of consent for the project as detailed in the application, PA/4126

Effective Date: 31st May 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 30 May 2022 until 30 June 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

200 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).

Concrete mattress deposits

Ten [10] concrete mattresses (as contingency should the existing mattresses not be able to be re-used), each measuring 6 metres x 3 metres x 0.15 centimetres. (The number of mattresses deposited should be the minimum required to provide the necessary protection, and any surplus mattresses must be returned to land).

4 Location of pipeline and stabilisation or protection materials

As stated in the 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 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



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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:

The Department has no comments.

3) All communications relating to the screening direction should be addressed to:

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	
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

The following 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

The Norpipe Wye (Wye) is located in the central North Sea on the Norpipe oil pipeline PL19 located in UK continental shelf (UKCS) block 30/23. It links production at Ekofisk in the Norwegian sector with the Teesside onshore Norpipe terminal in the UK and it is the point where production from the UKCS joins the Norpipe oil pipeline.

The proposal by ConocoPhillips Skandinavia AS (Conoco) is to replace a manually operated ball valve and T spool assembly located at the Wye with a new remotely operated ball valve assembly. This requires the isolation of the oil pipeline at the Wye, mechanically removing hydrocarbons in the line (pigging), flushing with filtered and chemically treated seawater to further clean the pipeline and de-pressure it to enable access.



A temporary area of seabed will be used by divers to recover existing mattresses on the Wye (re-used later depending on their integrity), to enable access to an existing glass reinforced plastic protection (GRP) cover which will also be moved and deposited there along with a new GRP cover deposited from a dive support vessel. Divers will replace the valve assembly, move the new GRP cover into position, re-cover with existing mattresses (unless new mattresses are required from the dive support vessel if existing mattress integrity fails). Rock, covering Norpipe main Wye location was previously moved by Chrysaor Petroleum Company U.K. Limited (Chrysaor) (BEIS ref: PL/2237). New rock will be placed on the Wye protection structure by fallpipe vessel. The pipeline will be re-commissioned. The work is described in OGA consent application reference: PA/4126.

Work is proposed to commence on the 1st June 2022 concluding on 30th June 2022 apart from rock deposit which will take place over 1 day in July or August 2022.

Description of project

The project is located at the Norpipe Wye in block 30/23 on pipeline PL91 at the point where production from Ekofisk in the Norwegian sector is joined by production from the UKCS for conveyance to the onshore Norpipe terminal in Teesside. The proposal is to upgrade the manually operated Wye connection ball valve and T spool assembly with a new double ball valve and T spool assembly enabling remote operation and to replace the existing glass reinforced plastic protection cover. This requires the pipeline to be isolated. It will then be cleaned prior to starting the work using a mechanical method of pigging applied at Ekofisk (Norway) and Fulmar installation (UKCS). The pipeline will also be flushed from Fulmar with filtered chemically treated seawater so that minimal hydrocarbon residue is left at the Wye work location. The light construction vessel *Skandi Hugen* will be deployed to remotely install pig detectors to track the pigs in the pipeline. The displaced hydrocarbon will be received at Teesside terminal. The pipeline will be depressurised prior to divers starting the work.

It should be noted that the rock protecting the existing GRP cover either side of the Norpipe Wye (and Judy spool) was previously relocated by Chrysaor Petroleum Company U.K. Limited (BEIS Direction Ref: PL/2237) 50m north east of the site beyond Judy spool line.

A dive support vessel (DSV) *Deep Artic* will be deployed to enable divers to remove ten mattresses to a temporary area of seabed within 25 to 200m of the pipeline for up to two weeks, enabling access to remove the existing GRP cover by horizontal rigging to the same temporary seabed area for recovery by vertical rigging to the DSV. The manually operated ball valve and T spool assembly will be removed. At this point the three chemicals in the filtered seawater used to flush the Wye of hydrocarbons from Fulmar will be discharged with 650m3 of seawater containing a worst case residual hydrocarbon concentration of 40 mg/l equating to a potential worst case discharge of 26kg of hydrocarbon oil. An oil discharge permit has been applied for ref: OTP/1231). The new remotely operated double ball valve and T spool



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assembly will be installed with biocide chemical sticks inserted which will be produced back to Teesside once the pipeline is operational again. The new GRP cover will be placed on the temporary seabed by dive support vessel for horizontal rigging into position on the Norpipe Wye. Where possible the existing mattresses will be re-located back onto the replacement structure unless their integrity dictates replacement is required with a contingency for up to 10 new mattresses 6 x 3 x 0.15m supplied from the DSV. Equipment used during the replacement operations consist of work and divers work baskets.

Up to 200 tonnes of new clean inert rock protection (containing minimal fines) will be deposited around the new GRP by the fallpipe vessel *Nordnes*. This will be mostly within the footprint of the rock which was previously relocated by Chryasor (BEIS ref: PL/2237) who will be reinstating protective rock cover at the Judy oil export pipeline tie-in spools (PA/4119). The pipeline will be recommissioned by pressure testing with the isolated seawater displaced to Teesside terminal by pigging.

Operations are proposed to start on 1st June 2022 with mattress replacement done by 30th June 2022 and rock placement undertaken in July or August 2022 over 1 day. The OGA consent application PA/4126 details the pipeline and deposits to be laid.

The risk of an unplanned diesel release from the vessels involved with the operations and has been assessed as well as from the Norpipe oil pipeline (PL19) in the Oil Pollution Emergency Plan (OPEP BEIS ref: 190071). The Norpipe system will be shut down, isolated, cleaned and flushed and depressurised to enable work by divers to be carried out. Minimal residual hydrocarbons will be present following cleaning. The potential for a major accident due to rupturing of the pipeline is therefore considered to be low with a number of control measures to be put in place to reduce the risk of an unplanned release occurring. 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.

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 is located in UK Continental Shelf (UKCS) Block 30/23 in the central North Sea (CNS) 279 km east of Aberdeen, 21 km west of the UK/Norwegian median line at the point 50km downstream from Ekofisk complex where production from



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Norway is joined by production from the UKCS for onward conveyance to the onshore Norpipe terminal at Teesside, referred to as the Norpipe Wye on pipeline PL91.

The project area is not located within any protected areas. The closest SAC to the proposed operations is Dogger Bank Special Protected Area (SAC), which is located some 91 km to the south of Norpipe Wye. The closest offshore Nature Conservation Marine Protected Area (NC MPA) to the proposed operations is the Fulmar Marine Conservation Zone, located 0.4 km to the east, designated for subtidal sand, subtidal mud and subtidal mixed sediment and OSPAR listed as threatened and/ or in decline Ocean quahog. The nearest Marine Protected Area (Scottish waters) is East of Gannet and Montrose Fields 90km away designated for ocean quahog and offshore deep sea mud habitats.

Water depth at the site is approximately 72m deep (UKHO, 2009) with average residual current of 0.23 knot in a north easterly direction and wind speed averaging 8m/s mostly from the south west.

The European Marine Observation and Data Network classify seabed sediment in the area of the project as deep circalittoral sand with deep circalittoral mud and deep circalittoral course sediment present. Surveys undertaken in 2020 (EnQuest) at the Alma and Galia fields 12km south east confirm silty, slightly shelly sands with scattered small depressions of accumulated shells. Surveys at Flyndre and Cawdor fields 26km north east confirm silty sand with occasional shell fragments (Maersk, 2011) and 50km north of the Norpipe Wye at Jasmine field surveys confirmed the same fine, slightly shelly, silty sand with dispersed shell communities (ConocoPhillips 2010). The project is located 0.4km from the Fulmar Marine Conservation Zone (MCZ), designate (apart from ocean quahog) on the basis of the presence of subtidal mud/ subtidal sand and subtidal mixed sediment.

Surveys at Galia and Alma fields found a predominance of infaunal polychaete annelids. The Fulmar MCZ has a variety of worms living in the sediment which are likely to be found at Norpipe Wye. Epifauna in both field surveys also found Amphiuridae species which are also located in the MCZ along with burrowing tube anenomes, brittlestar, sea potatoes and sea-pens where mud occurs.

Surveys confirmed the presence of one juvenile ocean quahog at Galia field and 16 juveniles at Alma field however, it is anticipated ocean quahog will be present at Norpipe Wye due to its proximity to the Fulmar MCZ, designated for this species which is also listed as threatened and or in decline by OSPAR.

Spawning species/ periods of note during the proposed operations include lemon sole, mackerel, sprat and whiting with peak spawning for mackerel between June and August and sprat in June. There are likely to be thirteen nursery species present including anglerfish, blue/ whiting, cod, ling, European hake, haddock, herring, lemon sole, ling, mackerel, plaice, sandeel, spotted ray, sprat, spurdog and whiting with anglerfish, blue whiting, cod, European hake, herring, ling, plaice and whiting designated as species of principal importance (SPI) which are threatened/ in decline.

The proposed project is in International Council for the Exploration of the Sea (ICES) Rectangle 41F2. Fishing intensity is mostly low with demersal species like plaice constituting most of the landings (highest in 2019 and highest catch months including June with minimal shellfish landings. Other landings include lemon sole, witch and dabs and no pelagic landings.

Sightings indicate harbour porpoise, minke whale, white beaked dolphin and Atlantic white-sided dolphin are potentially present in the project area with harbour porpoise of moderate density in June. All species are listed as PMF and species of national importance (Annex IV European Protected Species). Grey and harbour seals are unlikely to be encountered regularly 279 km offshore. The seal species and harbour porpoise are Annex II species.

The seabird breeding season is between March and June with birds anticipated to be located along the coast and in inshore waters and non-breeding species more likely offshore as determined by prey availability. After breeding season ends seabirds disperse offshore. Seabirds present in the project area during the proposed operation are likely to include artic skua, black headed gull, kittiwake and guillemot in moderate to high numbers with fulmar, gannet, kittiwake, guillemot, little auk and puffin found throughout the year. Seabird sensitivity to accidental spill is recorded as low in Block 30/23.

The proposed operations are in an area that experiences very low shipping intensity. The nearest oil and gas activity is a non-producing field 5.5km to the east and nearest producing field 10km north. There are no military restrictions on Blocks 21/30 and there are no known military activities within the area. There are no cables in the immediate vicinity of the proposed operations, the nearest being 38km north east. The nearest offshore wind development is 131km away. There are no protected or historically significant wrecks.

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, seabed disturbance, physical presence and atmospheric emissions, 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.

Cleaning of the pipeline before undertaking the work involves mechanical pigging



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and flushing during removal and replacement of the pipeline valve assembly. As a result of this work, three chemicals will be discharged in 650m3 of seawater when the old ball valve assembly is removed, one product poses no risk to the marine environment at all. The remaining two products, a hydrotest chemical and corrosion inhibitor have been risk assessed as posing no significant risk to the marine environment. The seawater may also contain residual hydrocarbon of up to 26kg at a concentration of 40mg/l after pigging and flushing. The seawater would be discharged over 5 hours. The impact of this discharge is minimal with rapid recovery of the marine environment anticipated and therefore posing no likely significant effect.

There will be a temporary loss of seabed habitat of 693 m2 over two weeks associated with the temporary lay down area being used to store the ten removed concrete mattresses, existing and new GRP cover and the footprint of three workbaskets and divers baskets. There may be the loss of individual species below deposited items which includes OSPAR listed as threatened or in decline ocean quahog which may be present, given it is a qualifying feature of the nearby Fulmar MCZ. There may also be re-suspension of sediment during disturbance. However, this impact will be minimal, ocean quahog are mostly buried and can tolerate a degree of smothering and there will be no impact upon the MCZ.

Mattresses will be replaced like for like on the new GRP cover. The 200 tonnes (70m3) of rock required for additional structural protection to be laid by fallpipe vessel, will be within the footprint of previous rock deposit moved by Chryasor (BEIS ref: PL/2237). The impact is very small and not considered significant.

Three vessels will be deployed at different times, a dynamically positioned construction support vessel LCV Skandi Hugen and dive support vessel DSV Skandi Arctic for up to 21 days and a fall pipe vessel *FPV Nordnes* (likely duration 1 day) located in an area of low fishing and shipping with negligible loss of access for other sea users. The operator will be required to communicate with vessels and notify activities to keep other users informed and there is a wide expanse of water available for navigation, there are therefore no significant navigational concerns.

Atmospheric emissions will arise from the three vessels to be deployed. Assessment indicates that the project will generate emissions which are a relatively small proportion of emissions arising from domestic and international shipping in the UKCS. Mitigation measures including advanced planning and up to date maintenance of vessel equipment will be undertaken to minimise impact with no significant effect on air quality.

Two of the vessels deployed to undertake the work will be on site for up to 21 days each (the fall pipe vessel for 1 day) with noise source levels typical of shipping noise ranging between 170 and 180 dB re 1 Pa @ 1 m. Cetaceans can show behavioural responses between 140 to 160 dB re 1 Pa and are most likely to avoid the immediate project area with no likely significant impact.

The timing of Conoco's valve and protection cover replacement is assessed to



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potentially overlap within a 4 day period of a project Chrysaor are undertaking between 1st and 30th June 2022 to relocate150m3 of rock and 4 mattresses at the point where Judy oil export line joins the Ekofisk to Teesside pipeline. While there is the potential for additional impact to atmospheric emissions and seabed disturbance, the impacts are minimal. There is therefore no potential for cumulative likely significant effect.

Although not a planned activity, an unplanned release of diesel from a vessel or hydrocarbon from the pipeline was assessed. The developer has mitigation and control measures in place to prevent this. The Wye pipeline will be depressurised, isolated and cleaned prior to carrying out the work. 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 consultees for the proposed operations. It is considered that the proposed operations to replace the valve assembly on PL91, replace the GRP cover, re-use of mattresses and deposit of 200 tonnes of new rock as specified in the project description at Norpipe Wye is not likely to have a significant impact on the environment and no cumulative impacts are expected to occur. The proposal aligns with the policies in the North East Offshore Marine Plan.

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.