

Our Ref: 01.01.01.01-5179U
UKOP Doc Ref:1210403



Offshore Petroleum Regulator
for Environment & Decommissioning

DANA PETROLEUM (E&P) LIMITED
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LONDON
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Registered No.: 02294746

Date: 16th June 2022

Department for Business, Energy
& Industrial Strategy

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Crimon Place
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
TRITON GAS EXPORT PIPELINE PL1645 END MANIFOLD**

A screening direction for the project detailed in your application, reference PL/2262/0 (Version 2), dated 7th June 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 [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**

TRITON GAS EXPORT PIPELINE PL1645 END MANIFOLD

PL/2262/0 (Version 2)

Whereas DANA PETROLEUM (E&P) LIMITED has made an application dated 7th June 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, reference: PA/4115.

Effective Date: 16th June 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 16 June 2022 until 31 October 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

12 [Twelve] tonnes of grout contained within 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).

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 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

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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 [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

SCHEDULE OF SCREENING DIRECTION DECISION REASONS

Stabilisation of Triton gas export pipeline end manifold (PLEM) by application of deposits to the outside of the manifold

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

Triton gas export pipeline end manifold (PLEM) is located in block 21/25b, 2.5 km north north-east (NNE) of Triton Floating Production Storage and Offloading (FPSO) vessel in the Triton field development area. This consists of subsea fields (Gannet East, Bittern, and the Greater Guillemot Area - block 21/24 & 21/23 (consisting of fields West, Northwest, Western Extension, Clapham, Pict and Saxon) all produced at Triton (FPSO) which is operated by Dana Petroleum (E&P) Limited (Dana). Scour



has been identified on the outside of PL/1645 gas export pipeline end manifold (PLEM) and therefore grout bags are proposed to be placed between the Gannet diverter tie in structure and PLEM to stabilise it.

The OGA pipeline works authorisation request to lay grout bags at the PLEM by Dana is PA/4115. A maximum of 480 x 25 kg grout contained in biodegradable bags is required to stabilise the PLEM and will be deposited by divers from the dive support vessel, Deep Discoverer between June 2022 and 31st October 2022.

Description of project

The Triton gas export pipeline end manifold (PLEM) is located on the 10" gas export pipeline PL/1645 2.5km NNE of Triton in block 21/25b, operated by Dana Petroleum (E&P) Limited (Dana). It allows gas from Triton to mix with gas from other fields.

Scour has occurred on the outer edges of the PLEM which was identified by a remotely operated vehicle (ROV) inspection in September 2020. Remediation of the scour is required to avoid structural instability. The proposal is to deploy the dive support vessel the Deep Discoverer to the site to enable divers to place a maximum of 480 (number) x 25kg grout bags (biodegradable bags) between Gannet diverter tie-in structure and the gas export PLEM to stabilise the scour as detailed in OGA consent application PA/4115.

The risk of an unplanned diesel release from the vessels involved with the operations has been considered and is covered by a vessel Ship Oil Pollution Emergency Plan. The potential for a major accident from working near the PLEM was considered. The work is being carried out to the outside of the structure and grout bags being placed by divers. 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.

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 the Triton field development area which consists of subsea wells tying producing fields (Gannet East, Bittern, and the Greater Guillemot Area - West, North West, Western Extension, Clapham, Pict and Saxon) back to Triton



Floating Production Storage and Offloading (FPSO) vessel operated by Dana Petroleum (E&P) Limited (Dana). The Triton gas export PLEM is approximately 2.5km NNE of Triton FPSO and therefore it is not located in a 500m safety exclusion zone, situated in UK Continental Shelf (UKCS) quadrant/block 21/25b in the central North Sea (CNS). The Triton gas export PLEM is located 154 km east of Scotland, 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 of the Triton gas export PLEM. There was no evidence of Annex I habitats of submarine structures made by leaking gases or reef. 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 north east, designated for OSPAR listed as threatened and/ or in decline ocean quahog aggregations (including sands and gravels as their supporting habitat as well as offshore deep sea mud habitat supporting diverse species including sea urchins, sea cucumbers, worms and molluscs. The 2015 survey found the OSPAR listed as threatened and/ or in decline ocean quahog in the Greater Guillemot Area at the majority of stations but in low numbers and as juveniles. No evidence of Annex I habitats or communities of conservation value were found during this survey.

Recent environmental baseline survey data (2015) of the Greater Guillemot Area, recorded water depth ranging between 84 to 98 m, average residual current of 0.01m/s and spring tides of 0.01-1.0 m/s. Winds prevail from the southwest and NNE, exceeding 8m/s during the majority of winter and more variable speeds in summer.

Sand and slightly gravelly sand cover most of the central North Sea which can have significant mud content classified 'muddy sand' (National Marine Plan interactive) and classed as 'Offshore circalittoral sand' (EUNIS) with 'offshore subtidal sands and gravels' known to occur in the Greater Guillemot Area which is a Priority Marine Feature (PMF). The 2015 survey found silty sand, fine sand, and silty clayey sand with consistently more than 7% silt/ clay content with shell fragments and minor depressions. No burrows were recorded in any of the Greater Guillemot Area surveys. The seabed survey results were not consistent with the potential for the OSPAR listed 'seapen and burrowing mega fauna community' being present. Seapens were found in surveys in very low numbers.

The 2014 survey in the Greater Guillemot Area identified 240 species, broadly similar to benthic species in the wider region with 50% of the species being polychaetes and brittle star, molluscs, seapen (*Pennatula phosphorea*), white curved tubes of *Ditrupa* species (a serpulid polychaete) and star fish at a few survey stations which aligned with previous survey results in 2005.

Spawning species/ periods of note during the proposed operations include mackerel (June peak, July and August), nephrops/ Norway lobster (June peak, all year spawning) and lemon sole (June to September). Nephrops and associated burrows have not been found on recent surveys. Nursery species include anglerfish, blue/



whiting, cod, European hake, haddock, herring, ling, mackerel, nephrops/ Norway lobster, Norway pout, plaice, sprat and spurdog with the majority being PMF. The probability of 0 group fish (juveniles) was recorded as low at the project location. Cod is OSPAR listed as threatened and/ or in decline, however, is not spawning during the proposed project period.

The proposed project is in International Council for the Exploration of the Sea (ICES) Rectangle 43F0. While fisheries mostly targeted pelagic species in 2020 with the highest landings, weight and value, demersal species dominated previous years from 2018 but overall effort is small in a UK context. There is increased effort from July to September coinciding with the project duration, but it is relatively low compared to overall UK effort.

Harbour porpoise and white beaked dolphin are frequently encountered year-round. Additionally Atlantic white-sided, white-beaked, bottlenose and common dolphin and Minke whale have been observed in the vicinity of the proposed operations, in moderate to low density during the proposed project period. All species are listed as PMF and species of national importance (European protected species). Grey and harbour seals are unlikely to be encountered regularly 154km offshore. The seal species, bottlenose dolphin and harbour porpoise are Annex II listed species.

Outside the seabird breeding season at the coast which ends around June, birds disperse offshore. Seabirds present in the project area during the proposed duration are likely to include northern fulmar, northern gannet, great skua, black headed kittiwake, species of gull (black backed, great black backed, lesser great black backed, herring) common guillemot, razorbill, little auk and Atlantic puffin some of which have been subject to declines in numbers. Seabird sensitivity to accidental spill is recorded as low in Blocks 21/24 & 25.

The proposed operations are in an area that experiences very low shipping intensity. The nearest oil and gas activity is 8 km away. There are no military restrictions and there are no known military activities within the area. There are no cables in the immediate vicinity of the proposed operations. The nearest offshore wind planned development area E2 is 16km west of block 21/24. The closest wreck is 3.7km southeast and 5.2 km northeast of the proposal.

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, physical presence, seabed disturbance, physical presence, underwater 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 largest component related to atmospheric emissions is the power generation from the dive support vessel Deep Discover. Assessment indicates that the project will generate a minor proportion of shipping and UKCS oil and gas emissions which will rapidly disperse offshore. Vessel emissions will be minimised, optimising deployment, compliance with MARPOL emissions standards and other shipping requirements with no likely significant effect on air quality.

A dive support vessel will work on site for 6 hours. There is likely to be negligible loss of access to other sea users. There is potential interaction with low volume routine fishing and shipping vessels in proximity to the project. The operator will be required to communicate with vessels and notify activities to keep other users informed. There is a wide expanse of water available for navigation. There are therefore no significant navigational concerns.

There will be a loss of 30m² of seabed habitat associated with 'offshore subtidal sands and gravels' a PMF present in the Greater Guillemot Area with a potential loss of juvenile OSPAR listed as threatened and/ or in decline ocean quahog (with siphon for feeding and respiration) associated with the footprint of deposits. While any species under the deposit location could be lost, this is a minimal area. Ocean quahog in the surrounding area are likely to be resilient to the minimal sediment disturbance generated by depositing grout bags by divers. Nephrops spawn on the seabed during the proposed project but neither they nor their burrows have been observed in recent surveys. Lack of burrows precludes the potential for the OSPAR listed 'seapen and burrowing megafauna community' habitat to be present. Sandeel are unlikely to be present due to the higher silt/clay content of sediment and the project timing does not coincide with their spawning period. Depositing grout bags will result in a loss of habitat and species limited to the footprint of the deposits. The impact is very small and not considered significant.

A dive support vessel with dynamically positioned (DP) thrusters will be used to undertake the deposit stabilisation at Triton gas export PLEM. DP's generate peak noise levels in the low frequency range. This can result in behavioural change such as masking in the immediate vicinity of a vessel. A moderate to low density of cetaceans are found in the area with infrequent visits by seals. Cetaceans show natural avoidance behaviour and are not considered to be adversely affected by the proposed operations. Noise impacts are therefore not considered to be significant.

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 stabilise the PLEM with 480 x 25kg grout bags to mitigate structural instability at the specified location 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. The proposal aligns with the policies in the National 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