

Our Ref: 01.01.01.01-5004U  
UKOP Doc Ref:1213656



Offshore Petroleum Regulator  
for Environment & Decommissioning

SHELL U.K. LIMITED  
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LONDON  
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Registered No.: 00140141

Date: 7th July 2022

Department for Business, Energy  
& Industrial Strategy

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[bst@beis.gov.uk](mailto:bst@beis.gov.uk)

Dear Sir / Madam

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

I refer to your amended application dated 5th July 2022, reference PL/2222/2 (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](mailto: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**

**CURLEW DECOMMISSIONING WORKS**

**PL/2222/2 (Version 1)**

Whereas SHELL U.K. LIMITED has made an application dated 5th July 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 applications PA/3680, PA/3734, PA/3742, PA/3751, PA/4050, PA/4051, PA/4052, PA/4199, PA/4200 and PA/4237.

Effective Date: 7th July 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 3 March 2022 until 31 December 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](mailto:bst@beis.gov.uk)

#### **3 Nature of stabilisation or protection materials**

Rock deposits

10,730 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 areas as described 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 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.

## **9 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.

## **10 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).

## **11 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:

N/A

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]



## **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:

### **Decision reasons**

The following provides a summary of the assessments undertaken by OPRED 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 or assessments 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 to the matters identified at paragraphs 1(a) to (g) of Schedule 5 to the Regulations, the characteristics of the project are as follows.

Deposit of up to 10,730 tonnes of protective rock associated with the decommissioning of the following Curlew pipelines and umbilical: PL2523, PL2524, PLU2525, PL1455B, PL1453, PL1454, PL1450 and PL1452 as follows:

PL2523 - Up to 304 tonnes of rock for pipeline protection.

PL2524 - Up to 304 tonnes of rock for pipeline protection.

PLU2525 - Up to 306 tonnes of rock for umbilical protection.

PL1455B - Up to 1,455.5 tonnes of rock for pipeline protection and to join two existing rock berms.

PL1453 - Up to 2,590 tonnes of rock for pipeline protection.



PL1454 - Up to 1,463 tonnes of rock for pipeline protection.

PL1450 - Up to 318 tonnes of rock for pipeline protection.

PL1452 - Up to 3,989.5 tonnes of rock for pipeline protection.

Note: i) these rock deposit quantities have increased over the initial PL/2222/0 application due to the results of further survey works and identified need for additional rock protection. ii) PL1451 was fully removed, and rock deposit is no longer required.

Note ii) PL/2222/2 updated to align co-ordinates of rock deposits associated with PL1445B with updated co-ordinates in the OGA Deposit Consent application PA/4237. No change to potential impact.

### Description of project

Sections of the above pipelines and umbilical will be removed under the authority of a separate marine licence. However, the deposit of the above rock is the subject of this direction.

Rock will be deposited from a vessel. The project will be supported by three construction vessels and a survey vessel. Project activities are scheduled to occur between March 2022 and December 2022.

No significant cumulative interactions are foreseen with any other existing or approved projects.

There is not likely to be any significant impact of the project on population and human health.

There is no credible potential for a major accident or disaster to affect this project.

Any wastes associated with the project will be recovered to shore. No significant impacts are anticipated.

### **Location of the Project**

Having regard to the matters identified at paragraphs 2(a) to (c) of Schedule 5 to the Regulations, the environmental sensitivity of geographical areas likely to be affected by the project has been considered as follows.

The project location lies within a seaward licenced area within Quad/Block 29/7, which has been licenced for the exploration and extraction of hydrocarbons. The project is located approximately 208 kilometres (km) southeast from the northeast Aberdeenshire coastline and 68km west of the UK/Norwegian median line, in an area where water depth is approximately 93 metres (m). The predominant current in the location is dominated by the Atlantic flows moving southwards, with offshoot currents





moving east and a northward outflow via the Norwegian Trough.

The project location is not within any protected areas, with the closest, the East of Gannet and Montrose Fields Marine Protected Area (MPA) being approximately 23 km to the northeast. This site is designated for the conservation of offshore deep-sea muds and *A. islandica* aggregations (including sands and gravels as their supporting habitat).

Site-specific surveys identified the seabed as having a sediment as consisting of 'muddy sand/sandy mud'. The most observed benthic fauna included annelids, arthropods and molluscs. there is the potential for the presence of the OSPAR listed threatened and or declining habitat 'Sea pens. and burrowing megafauna communities' to occur in the Curlew area

The project works and timing will take place at a time when a number of fish species may be found to using the area as spawning, juvenile or nursery locations. Sightings of cetaceans are most common during the months of May to October. Seals are not expected to be seen at the remote location. In the blocks surrounding the project seabird oil sensitivity is very high to low during the proposed period of operations but no well related activities will take place during the project and there is no risk of release of reservoir hydrocarbons. The project area is used for demersal, pelagic and shellfish fishing, but with a relatively low historical effort. Shipping intensity at the project location is low. The surrounding area comprises other oil and gas infrastructure with the closest being the Catcher platform 42km to the west with no marine aggregate sites, military exercise areas or renewable energy locations in proximity.

Given the location of the project, the areas identified at paragraphs 2(c)(i), (ii), (iii), (iv), (vi), (vii) and (viii) of Schedule 5 are not likely to 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 to the environment from the activities associated with the project were assessed, with focus on the predominant impacts resulting from physical presence from the vessels, atmospheric emissions from vessel use and seabed disturbance from deposit of protective materials.

The project vessels have the potential to cause interference to other users of the sea, namely fishermen and vessel traffic, however they will be primarily located in the various Curlew safety zones. Their presence within the safety zones means only authorised vessels would be allowed within the 500 m radius of the project locations, therefore excluding other users of the sea. Given the relatively low importance of the fishing area, the low vessel traffic, and that the project is a temporary activity - the impact is deemed insignificant.

The area of seabed disturbance resulting from placement of protective materials is



0.048 km<sup>2</sup>. The main receptor impacted by seabed disturbance will be the benthic communities. Physical disturbance can cause mortality or displacement of benthic species in the impacted zone. The impacts to sessile benthic communities are expected to be at individual-level, rather than population-level. Therefore, the impact on benthic communities will not be significant.

Offshore chemicals will be used and discharged during the project. The use and discharge of the chemicals have been risk assessed and modelled in accordance with other regulatory requirements. The use and discharge modelling shows a low risk to the environment from the chemicals and therefore they are not expected to have a significant impact on the environment.

Emissions to air will occur from combustion plant used on the vessels. The quantity of carbon dioxide equivalent from the vessels amounts to 0.0425% of the 2018 total CO<sub>2</sub>e emissions from offshore oil and gas activity. The impact of the vessel emissions will be mitigated by optimising vessel efficiency and hence minimising fuel use and avoiding the unnecessary operation of power generation/combustion equipment. The environmental effects from emissions to air are not expected to have a significant impact on the environment.

There are no expected transboundary impacts because of the project.

There is no possibility of a release of reservoir hydrocarbons associated with the project. The release of diesel fuel from the project vessels is considered a low risk due to the controls in place. If diesel is released to the marine environment, it is a non-persistent hydrocarbon and will rapidly disperse and evaporate. In the event of a diesel release the vessels would respond in accordance with their shipboard oil pollution emergency plan (SOPEP). There is no major environmental incident potential associated with the project.

Taking all the above determinations into account, the Secretary of State has concluded that the project is not likely to have a significant impact on the environment.

## **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.