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Offshore Petroleum Regulator
for Environment & Decommissioning

TAILWIND MISTRAL LTD
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Registered No.: 04458621

Date: 22nd July 2022

Department for Business, Energy
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Dear Sir / Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020
EVELYN FIELD: TIE IN PRODUCTION PIPELINE PL6001**

I refer to your amended application dated 22nd July 2022, reference PL/2224/2 (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.

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**

EVELYN FIELD: TIE IN PRODUCTION PIPELINE PL6001

PL/2224/2 (Version 1)

Whereas TAILWIND MISTRAL LTD has made an application dated 22nd 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 agreement to the Oil and Gas Authority to the grant of consent for the project as detailed in the application, PA/4264.

Effective Date: 22nd 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 1 May 2022 until 30 April 2023.

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

62,920 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).

Sand bags deposits

50 tonnes of clean, inert sand material containing minimal fines, contained within 1 tonne capacity salt sacks which are to be slashed and the bags removed to surface. (The number of bags deposited should be the minimum required to provide the necessary use as turning bollards, and any surplus bags must be returned to land).

Grout bags deposits

66 tonnes of grout contained within 2,640 x [twenty five] 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).

Concrete mattress deposits

Twenty four [24] concrete mattresses, each measuring Six [6] metres x Three [3] metres x Fifteen [15] centimetres and

One hundred and fifty five [155] concrete mattresses, each measuring Six [6] metres



x Three [3] metres x Thirty [30] 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 Marine mammal mitigation measures - piling

The Offshore Petroleum Activities (Conservation of Habitats) Regulations 2001 (As Amended)

All piling activity should be undertaken in accordance with the relevant sections of the 'Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise' JNCC, August 2010 and this should be followed at all times during piling works. This includes:

- a) The pre-piling search and soft start should be timed to occur during hours of daylight/ good visibility to allow an MMO to observe for any marine mammals within 500m of the sound source and if necessary delay the soft start if animals are detected within this zone.

The soft start should involve the first five hammer blows at 30% hammer energy,



blows 6 to ten at 60% hammer energy and thereafter 100% hammer energy.

b) If the pre-piling search and soft start cannot be timed to occur during daylight hours/ good visibility then consider using a PAM system to allow effective mitigation during the hours of darkness/ periods of poor visibility.

c) As a minimum, one dedicated MMO must be used for the duration of piling works. They should be fully trained and not have a dual role onboard (for example, in addition working as a Fisheries Liaison Officer).

d) At the end of the survey, a report (indicating the BEIS reference number) should be sent to JNCC. This report should detail the soft start procedures, any visual (and potentially PAM) observations and include the Marine Mammal Recording (i.e. the Excel spreadsheet) in its original format (not converted to pdf). Any difficulties encountered, or recommendations that may be of use to future work should be included within the report.

e) A record of the piling operations must be maintained on board the vessel(s) undertaking the operations covered by the consent, and made available for inspection upon request by any persons authorised to act on behalf of the Secretary of State. The record must include:

- i) the date and time of commencement and completion of the piling activities;
- ii) the date and time of commencement and completion of any marine mammal visual or acoustic searches;
- iii) the date and time of commencement and completion of any soft start procedures;
- iv) details of any problems encountered during the piling, including information relating to the physical injury of any marine mammal or conflict with fishing gear or fishing operations.

f) The consent holder shall ensure that, prior to the start of the operations authorised under the consent, copies (electronic or paper) of the consent and any other relevant documents are made available:

- i) at the premises of the consent holder;
- ii) at the premises of any agent or contractor acting on behalf of the consent holder;
- iii) on board the vessel(s) undertaking the operations covered by the consent; and
- iv) to any Marine Mammal Observer (MMO) or Passive Acoustic Monitoring (PAM) operative involved in the piling operations.

g) The consent holder must notify the Department of any non-compliance relating to the consent conditions relating to piling within 24 hours of detection of non-compliance.

h) A copy of the survey close out form should be submitted to the Environmental Management Team mailbox: bst@beis.gov.uk, within 12 weeks of the date of expiry



of the consent.

8 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

9 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.

10 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.

11 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.

12 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).

13 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

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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
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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

Evelyn Field development in block 21/30f currently consists of EV-01 development well, drilled in 2021 (BEIS Ref: DRA/885). The proposal is to tie this well to Triton Floating Production Storage and Offloading vessel (FPSO) in block 21/30e for production (OGA consent application reference: PA/3656). This involves the trench and burial of a new 7.14 km rigid 8" production pipeline PL6001, a 3" gas lift pipeline PL6002 (piggybacked to PL6001) and a 9.558km control umbilical PLU6005 (conveying chemicals, hydraulic and electrical controls). Associated jumpers and spools will enable the pipeline tie into a newly installed Gannet East, Evelyn, Belinda and Bittern (GEEBB) manifold at the riser base of the FPSO (to be carried out by Dana Petroleum (E&P) Limited BEIS Ref: PLA/900), umbilical to be tied into Triton on a separate route to the pipelines to the Triton SY9516A riser base and all to be linked



to well EV-01 via a new Evelyn valve skid installed by piling downstream of this well. Pipelines and umbilical will be trenched separately with stabilisation deposits of grout bags, mattress and rock where burial cannot be achieved due to existing pipelines and umbilical's, trench transition zones between surface and full burial of 1.6m depth, other pipeline crossings and where spot rock deposits are proposed where inadequate burial depth is achieved following post lay survey to mitigate pipeline/ umbilical deformation/ buckling out-with the trench. A maximum of 62,920 tonnes of rock is required for stabilisation and will be deposited by a fall pipe vessel. The Evelyn valve skid and pipelay is proposed May to June 2022 with deposits laid June to August 2022. Dana will install the GEEBB in parallel. Commissioning of the pipelines is proposed in September 2022 with link up to the FPSO for Evelyn field production. An amendment to the rock deposit location was requested on 21st July 2022, updated 22nd July 2022, BEIS Ref: PL/2224, OGA consent reference PA/4264 with no change to the previously requested quantity.

Description of project

The installation of a new 7.14km long 8" production (PL6001) and 3" gas (PL6002) pipeline linking EV-01 hydrocarbon development well to Triton FPSO for processing via a new Evelyn valve skid. The 3" gas lift line will be piggybacked to the 8" pipeline. Both pipelines will be pre-laid by a construction support vessel, a reel lay vessel, reeling them onto the seabed to be subsequently trenched by a trench support vessel (to a 30-degree slope) and buried using a multipass and backfill plough over a 5.6m wide corridor with heading control vessel to assist. Target depth is 1.6m. A guard vessel will be present when pipe lay is complete and prior to deposits being laid when no other vessel is present. Trenching will not occur at Triton between the proposed new Gannet East, Evelyn, Belinda and Bittern manifold (GEEBB) and an existing Dana umbilical (PLU3123) where pipelines will be surface laid. Pipelines will also be surface laid at Evelyn valve skid and stabilised with mattress, grout bags and rock. The GEEBB is a gravity-based structure which Dana Petroleum plan to install in the Triton FPSO 500m safety exclusion zone at the Bittern riser base to allow mingling of fluids from the GEEBB named fields (see above) which includes Evelyn field for processing. The trench will transition from surface to 1.6m burial over 50m requiring stabilisation deposits to minimise pipeline buckling risk. Deposits will be laid by construction support, dive support (mattress and grout bag placement) and flexible fall pipe vessel(rock) guided/ monitored by a remotely operated vehicle (ROV) for accuracy.

A vessel with downline will connect to the 8" pipeline flushing it with dyed seawater in between connecting to the pig launcher to push gels through to remove pipeline debris and a gauging pig. Similarly, the 3" gas lift line will be flushed with dyed seawater between gel cleaning. Both pipelines will be proved, and pressure tested using dyed seawater also used to test barriers at EV-01 well. The dyed seawater in the 3" gas lift line will be replaced with flushed MEG and water. All discharges will be subsea. Spools connecting the pipelines to the EV-01, the Evelyn valve skid and GEEBB will be free flooded offshore or pre-filled with gel. This will be discharged at tie in along with added dye sticks to confirm no leaks and biocide sticks to protect cavities in the new connections. 10% of the dye and biocide sticks and 5% of the



dyed seawater, MEG/ water mix in the pipelines is assumed to be discharged when connecting the production system up with the remainder discharged in produced water at Triton.

A new control umbilical PLU6005, 9.56km long will be similarly installed in a separate trench between another Triton FPSO riser base location and Evelyn development, being surface laid for 3.5km at Triton to accommodate a mooring cluster and existing Bittern pipelines/ umbilical crossings (Dana) PL1646, PL1647, PL1648, PL1649, PL1650, PLU1651, PLU3123 and PLU3567. It will also be surface laid at Evelyn with the same 50m transition from surface to achieving full trenching depth in between. Salt sacks filled with sand will assist in positioning the umbilical. Rock, concrete mattress and grout bag are required to further reduce the risk of upheaval buckling.

A maximum of 62,920 tonnes of rock is required for stabilisation of the pipelines and umbilical where surface laid, over crossings, trench transition and where inadequate burial is achieved. Rock will be deposited by flexible fall pipe vessel monitored by Remotely Operated Vehicle (ROV) to ensure accuracy. Where rock is used for protection, berm width will be a maximum of 7m and height of 1m above the pipelines and 0.6m above the umbilical. A post lay survey done by survey support vessel will identify where insufficient burial depth was not achieved and where further rock will be deposited to prevent thermal, and pressure induced upheaval buckling of the pipeline. A request to extend the rock deposit location by 15m was made on 21st July 2022 following inspection identifying exposed umbilical PLU6005. Rock placement for the umbilical's Bittern to SY9516A crossings will not change as 18,528 tonnes of actual deposits have been made from 33,000 tonnes applied for.

In total 179 mattresses (24 mattresses of dimension 6mx3mx0.3m and 155 mattresses of dimension 6mx3mx0.15m) and 2,640 x 25kg grout bags (66 tonnes) will be laid by divers on spool and jumper connections and pipeline crossings (with rock placed over other deposits for additional protection) plus 50x 1 tonne salt sacks containing loose sand for positioning (bag slashed and removed, contents deposited) using temporary equipment including clump weights and clump weight frames placed in the existing disturbance corridor.

Operations are proposed to start on 1st May 2022 with pipe lay activities in phase 1 and deposit laying in phase two with a gap of 13 days when a guard vessel will be present, 139 vessel days in total to complete. An end date 30th April 2023 including contingency for potential delays has been requested. The OGA consent application PA/3656 details the pipeline and deposits to be laid.

The Evelyn valve skid (EVVS) will be installed during the pipelaying phase by piling the 9 x 6m structure with four piles driven 20m into the seabed by hammer from a construction support vessel with ROV monitoring, taking eight hours in total.

The risk of an unplanned diesel release from the vessels involved with the operations has been assessed. The 8" and 3" pipelines will be laid empty, but the umbilical will be pre-filled prior to deployment offshore. No hydrocarbons will be present. The potential for a major accident due to rupturing of a live line in the vicinity of the pipe



lay and spillages from the pipe lay vessels was considered. Control measures will be 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 GEEBB will be carried out in 2022, independent of this operation but in parallel as proposed in BEIS ref: PLA/900 (Dana).

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 area starts at the Evelyn field and ends at the Guillemot West field where Triton is located, both located in the UK Continental Shelf (UKCS) Block 21/30 in the central North Sea (CNS). Evelyn is located 165 km east of Aberdeen, 92 km west of the UK/Norwegian median line while the Triton FPSO is 170km and 86km respectively from the relevant coast and 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 139 km to the north of Evelyn. 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 6 km to the east, designated for OSPAR listed as threatened and/ or in decline Ocean quahog and qualifying habitat. The 2021 survey did not find any of this species, though low numbers were observed during a 2015 survey.

Recent environmental baseline survey data (2021) of the Evelyn area, recorded water depth ranging between 90 to 102m (umbilical route) and 95.8m at Triton FPSO, average residual current of 0.01m/s and spring tides of 0.01-1.0 m/s, winds prevail from north north-east, 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 'deep circalittoral sand' with the potential for 'Offshore subtidal sands and gravels' habitat, a Priority Marine Feature (PMF). The 2021 survey found sand, muddy sand and sandy mud with circular depressions consisting of shell fragments with occasional boulders and cobbles and at Evelyn sample stations showed fine to very fine sand. The sediment is heavily bioturbated



with numerous burrows suitable for the OSPAR listed 'sea pen and burrowing megafauna community' to be commonly present and the abundance of sea pens on the SACFOR scale were mostly common/ frequent for *Pennatula phosphorea* to absent/occasional for *Virgularia mirabilis* indicating the potential that this habitat is potentially present.

The block is 4km southwest of the PMF deep sea mud and the pipeline is 4.5km north and 7.2km south at nearest point from Annex I 'submarine structures made by leaking gases' but the circular depressions found at locations along the pipeline route did not indicate active pockmarks.

The 2021 survey showed homogenous benthic species along the pipeline route dominated by polychaetes, sea pens, anemones, starfish and hermit crab. Faunal turf, hydroids, soft coral, sea urchins, sea mouse, whelk, spider and king crab were also found.

Tubes and burrows are present with common/ frequent Lobster burrows on the SACFOR classification. Spawning species/ periods of note during the proposed operations include Mackerel (May to June peak and July), Nephrops/ lobster (May/ June peak, all year), sandeel (November, December) and lemon sole (May to September) and thirteen nursery species including anglerfish, blue/ whiting, cod, ling, Norway pout, herring, mackerel, sandeel and spurdog which are PMF. Sandeels are less likely to spawn in the area due to greater than 10% silt content found during surveys. Cod is OSPAR listed as threatened and/ or in decline.

The proposed project is located in International Council for the Exploration of the Sea (ICES) Rectangle 43F0. While fisheries mostly targeted pelagic species in 2020, with the highest effort, weight and value, demersal species dominated previous years from 2016 but overall effort is small in a UK context.

Atlantic white-sided/ bottlenose and common dolphin, harbour porpoise, minke and white-beaked whale have been observed in the vicinity of the proposed operations. Densities of these species are predominantly moderate where data is available. All species are listed as PMF, species of national importance (European protected species). Grey and harbour seals are unlikely to be encountered regularly 165km offshore. The seal species, bottlenose dolphin and harbour porpoise are Annex II species.

Outside seabird breeding season at the coast, birds disperse offshore. Seabirds present in the project area include northern fulmar, species of shearwater, European storm petrel, northern gannet, species of skua, gull, kittiwake, guillemot, razorbill, auk and puffin some of which have been subject to decline in numbers. Seabird sensitivity to accidental spill is recorded as low in Block 21/30.

The proposed operations are in an area that experiences very low shipping intensity. The nearest oil and gas activity is Triton FPSO to which Evelyn will be tied to. 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 offshore wind development is 139km away and areas identified for wind 31km away. The closest wreck is 4km northeast.

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, 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 operator has minimised atmospheric emissions by faster reel laying the flowline, reducing installation time, vessel time, sharing vessels and activities and other mitigation. Impact on air quality will be limited due to rapid dispersion offshore with no likely significant impact.

There will be a loss of seabed habitat with associated OSPAR listed potential 'sea pen and burrowing megafauna community' habitat, Norway lobster which inhabits burrows and the potential for OSPAR listed as threatened and/ or in decline ocean quahog (with siphon for feeding and respiration) associated with the footprint of the pipeline, umbilical Evelyn valve skid, jumpers, spools and deposits including direct and indirect amounting to 0.367 km². Deposit of grout bag and mattress are likely to be recoverable at decommissioning, but rock deposit will result in a loss of burrowing habitat and is likely to be colonised by other species. The impact is very small and not considered significant.

Disturbance impacts amount to 0.126 km² of seabed. A 5.6m wide trench and 5m disturbance either side of this for spoil deposit and re-burial of the pipeline within the trench. Indirect impact will arise from re-suspension of fines resulting in localised smothering of the seabed in the immediate area over a short period of time. Seapens and burrowing megafauna are sensitive to disturbance, but impacts will be localised, and sea pens can re-anchor. Sandeel are unlikely to be found due to the high silt content. Norway lobsters are less sensitive to smothering. The slower speed of trenching to achieve accuracy will minimise direct disturbance and backfill will enable recolonisation. Sediment and current indicate a quiescent benthic environment which is why the trench will be backfilled to remove mounds and scars enabling faunal recovery. The area of seabed impacted by loss and disturbance is very small, representing a small area of similar habitat and therefore impacts are not considered to be significant. The request to amend the Direction (21st July 2022) does not change the assessment.



Eight vessels will work over different periods contributing to the overall duration of the project of 114 days moving over a limited area of sea within and out with the 500m exclusion zone at Evelyn EV-01 well and Triton FPSO with negligible loss of access to other sea users. A collision risk assessment and vessel traffic survey has been undertaken. 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 and there is a wide expanse of water available for navigation, there are therefore no significant navigational concerns. The pipeline crossings, trench transitions and spot rock locations where insufficient pipeline burial are achieved will be designed not to impact fishing activity which will continue as normal.

The largest component of atmospheric emissions will arise from the eight vessels deployed. Vessels will be combined between Dana and Tailwind's proposed operations and tasks. Assessment indicates that the project will generate emissions that are a relatively small proportion of emissions from UKCS oil and gas production. Mitigation measures are in place for all vessels including UK Air Pollution Prevention (UKAPP) or IAPP certification to minimise impact with no significant effect on air quality.

The Evelyn valve skid will have four piles sunk to a depth of 20m over a duration of 2 hours per pile, 8 hours in total, hammer energy ranging between 2kJ initially to 50kJ (decreasing with depth) to a depth of 20m. Modelling indicates a potential zone of injury of 10m for all cetaceans in 20m water depth, extending for harbour porpoise but a fourfold reduction in source energy between 10 and 50m. Water depth at the project site is 98.8m increasing potential energy propagation. The area of significant disturbance using observations from other piling offshore indicates a displacement radius of 172km² which could impact an estimated 153 individuals. Other noise sources are expected to be within background levels. The first few hammer blows will be at reduced energy and that combined with the natural avoidance behaviour of cetaceans as well as the operator following the JNCC protocol for minimising risk of injury to marine mammals will result in no likely significant from noise. Timing of piling is not assessed to occur while other geophysical surveys or other noise related activities are being undertaken. Impact on spawning fish species including Norway lobster is localised with no likely significant effect.

Commissioning of the pipelines will involve flushing and pressure testing of the 3" and 8" pipelines and barrier testing EV-01 well using dyed seawater, removal of any debris in the 8" line using pig launched chemical gel, further conditioning of the gas lift line with a MEG water mix and addition of biocide and dye sticks when connecting the pipelines to the well, Evelyn valve skid and GEEBB via the spools (which may be prefilled with chemical gel). All flush and pressure test fluids will be discharged. Tie in will result in minor discharges of pipeline and spool contents and biocide/ dyed sticks with the majority returned to Triton FPSO for discharge in produced water. Chemicals have been selected based on posing little or no risk to the marine environment on discharge at Evelyn and Triton FPSO and have been risk assessed as posing no likely significant impact on 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. No work is being undertaken in proximity to live pipelines; all pipelines are to be crossed and buried. 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 install PL6001/2 and PLU6005, a new valve skid, jumpers and deposits including 62,920 tonnes of rock and other deposits as specified in the project description at the specified locations along the 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. 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