

Our Ref: 01.01.01.01-5229U
UKOP Doc Ref:1220097



Offshore Petroleum Regulator
for Environment & Decommissioning

PERENCO UK LIMITED
8 HANOVER SQUARE
LONDON
W1S 1HQ

Registered No.: 04653066

Date: 12th August 2022

Department for Business, Energy
& Industrial Strategy

AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [REDACTED]

Fax [REDACTED]

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 PL22**

A screening direction for the project detailed in your application, reference PL/2276/0 (Version 4), dated 11th August 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**

PIPELINE PL22

PL/2276/0 (Version 4)

Whereas PERENCO UK LIMITED has made an application dated 11th August 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/4107

Effective Date: 12th August 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 August 2022 until 30 July 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 filter units

6 [Six number] four tonne rock filler units, containing minimal fines, (The quantity of deposited should be the minimum required to provide the necessary stabilisation or protection, and any surplus must be returned to land).

Concrete mattress deposits

102 [One hundred and two number] concrete mattresses, each measuring 5.6 metres x 3 metres x 50 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 operator is requested to provide OPRED with a summary of results from ongoing pipeline monitoring (surveys to be directly comparable locations) to show the relative change in the number and length of freespan and exposed sections of pipeline.

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

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:

PL/2276/0 (Version 4)

Operator to note reef assessment method to be used for future is Jenkins et al (2015) and (2018).

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

Placement of deposits (concrete mattresses and rock filter units) on the seabed to secure and support freespans at 14 locations on PL22

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.

1) Decision reasons

Characteristics of the Project

Having regard, in particular, to the matters identified at paragraphs 1(a) to (g) of Schedule 5 to the Regulations, the characteristics of the project include the following:-

This screening direction (ref: PL/2276/0) relates to a 2022 pipeline remediation campaign involving the placement of deposits (concrete mattresses and rock filter units RFUs) on the seabed to secure and support freespans at 14 locations on PL/22.

Summary of project

The deposit of 102 mattresses and 6 rock filter units (RFUs) on PL/22 as per OGA consent application PA/4107

Description of project

The PL22 pipeline connects the Inde 23A platform to the Lemman 27B platform in the



southern North Sea, traversing UKCS blocks 49/23a-c, 49/27a-c, and 49/28c. At its closest point the PL22 pipeline is located approximately 54 kilometres (km) north-east from Bacton on the Norfolk coast and 32 km west of the UK / Netherlands median line and is routinely inspected to monitor the development of exposures and freespans and remediation works on the pipeline are identified and undertaken as necessary.

Perenco plans to carry out the placement of up to 102 mattresses and up to 6 rock filter units (RFUs) to secure and support freespans at 14 locations on PL22. The earliest commencement date of operations is 9 August 2022 and the latest completion date for 30 July 2023.

Freespan correction and the prevention of pipeline buoyancy are essential to ensure pipeline integrity (and prevent pipeline failure) and protect the safety of other users of the sea. Fishing vessels are particularly vulnerable to snagging hazards such as these and remediation works will minimise the risk considerably by reducing the height and length of the identified spans.

No significant cumulative or in combination impacts are expected to occur between this project and other existing 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.

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 PL22 pipeline connects the Inde 23A platform to the Lemn 27B platform in the southern North Sea. The areas proposed for remediation are located approximately 53 km northeast of Bacton. Approximately 4.9 km of the pipeline requiring remediation is within the North Norfolk Sandbanks and Saturn Reef SAC and 2.5km within the Southern North Sea SAC.

At its closest point the PL22 pipeline is located approximately 32 km west of the UK / Netherlands median line. The water depth in the vicinity of the deposit areas vary between 17 and 37 m and the seabed sediments are sublittoral coarse sediment, sand, mud and mixed sediments. The faunal communities found in the area are those typically associated with sublittoral coarse sediment, sand, and mixed sediments, supporting various biotopes such as polychaetes, amphipods, bivalves and echinoderms.

The project location is within the Southern North Sea SAC, designated for harbour porpoise and within the North Norfolk Sandbanks and Saturn Reef (NNS) Special Area of Conservation (SAC), designated for sub-tidal sandbank and reef features and approximately 13km from the Haisborough Hammond and Winterton (HHW) SAC which is designated for the protection of Annex 1 habitat (reef features).



Sabellaria spinulosa reefs is considered to be potentially present within the vicinity of the pipeline which is within the North Norfolk Sandbanks and Saturn Reef SAC. Recent surveys indicated there were a number of areas of high confidence of Sabellaria some in proximity to the pipeline, should Sabellaria be found during the proposed works Perenco will avoid significantly observed areas of reefiness and reconfigure deposit placements where possible.

Harbour porpoise and white-beaked dolphin have been sighted in the area with surveys indicating that there is a moderate cetacean presence during the potential operational period. Spawning for herring, lemon sole, mackerel, plaice, sandeels, nephrops and sprat may coincide with the project works. The project area is not within a commonly fished ground and fishing effort is historically very low. Seabird sensitivity in the area is low to very high during the period of operations.

Oil and gas activity in the vicinity of the project is high and the project area of the southern North Sea (SNS) have extensive oil and gas infrastructure. The closest wind farm, Norfolk Vanguard, recently consented is approximately 12km to the south. The recently consented Norfolk Boreas wind farm is 25km from the nearest deposit location. Due to the proximity of key ports around the Norfolk and Lincolnshire coasts, the density of shipping traffic is high in the southern North Sea but low to medium at the project location itself.

There are no Royal Airforce Practice and Exercise Areas (PEXA) in the vicinity of the pipeline deposit locations. There are no active dredging or dredge disposal sites or charted wrecks.

Given the location of the project, it is not likely that the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) and (viii) of Schedule 5 are not likely be affected by the project.

Type and characteristics of the potential impact

In accordance with Schedule 5 paragraph 3 of 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 physical presence of a vessel on location and seabed disturbance.

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 physical presence of the single vessel involved will not have an exclusion area, however the vessel will be subject to navigational provisions and able to move away in an emergency. The project is in a very low-level fishing area and so the impact to other users of the sea is not expected to be significant. Noise and atmospheric emissions impacts are not considered to be significant.

The remediation programme has the potential for the deposit of 102 mattresses and



6 rock filter units (RFUs) along the pipeline. This will cause seabed disturbance and loss of soft sediment habitat in an area of up to 1781m² along the pipeline corridor. This is a conservative estimate as it assumes that all the deposit material from each will be used, including contingency amounts. This is a relatively small area compared to the wider southern North Sea with similar soft sediment habitat. The placement of the deposits could have a permanent impact on the local sediment faunal communities, potentially smothering any flora and fauna directly beneath it.

At one location along PL22 4 RFUs and 1 concrete mattress are proposed proximate to an area of lower-level confidence Sabellaria presence and 8 mattresses in a higher confidence location but not directly on the potential aggregation. Remediation at locations 5-14 on PL22 will be within the NNSSR SAC which equates to less than 0.00004% of the total NNSSR SAC. Due to the small and localised nature of the impact of the proposed activities, the deposits are not expected to affect the overall sediment transport patterns, natural shape and development of the sandbank system.

Due to the designated features of the nearby Southern North Sea SAC, it is not anticipated there will be any discernible impacts on the SAC or protected species from seabed disturbance, in addition the short nature and low levels of noise associated with the operations are not likely to have a significant impact on harbour porpoise. Given the above, the proposed placement of deposits is not likely to significantly adversely impact harbour porpoise in the SNS SAC.

There are no expected transboundary impacts because of the project and no significant cumulative or in combination impacts have been identified given the other known approved projects in the wider area.

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 for the proposed activities.