

Our Ref: 01.01.01.01-5230U
UKOP Doc Ref:1220100



Offshore Petroleum Regulator
for Environment & Decommissioning

PERENCO UK LIMITED
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LONDON
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Registered No.: 04653066

Date: 12th August 2022

Department for Business, Energy
& Industrial Strategy

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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
PIPELINE PL23**

A screening direction for the project detailed in your application, reference PL/2277/0 (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 PL23

PL/2277/0 (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/4108.

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 1 August 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

Concrete mattress deposits

118 [One Hundred and Eighteen] concrete mattresses, each measuring 5.3 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/2277/0 (Version 4)

Jenkins et al (2015) and (2018) methods for assessing reef aggregations are recommended for future submissions.

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) on the seabed to secure and support freespans at 11 locations on PL23

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/2277/0) relates to a 2022 pipeline remediation campaign involving the placement of deposits (concrete mattresses) on the seabed to secure and support freespans at 11 locations on PL23.

Summary of project

The deposit of 118 mattresses under OGA consent reference: PA/4108

Description of project

PL23 is the export pipeline for all gas produced within both the Lemn and Indefatigable fields, and is located between the Lemn 27A platform in UKCS Block 49/27 complex and the Bacton Gas Terminal on the Norfolk coast. The pipeline



spans UKCS Blocks 48/30c, 49/26a, 49/26b, 49/27a, 52/3, 52/4a, 52/4b, and 52/5a and is 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 118 mattresses to secure and support freespans at 11 locations on PL23. The earliest commencement date of operations is 16th August 2022 and the latest completion date for 1st August 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.

PL23 is the export pipeline for all gas produced within both the Leman and Indefatigable fields and is located between the Leman 27A platform in UKCS Block 49/27 complex and the Bacton Gas Terminal on the Norfolk coast.

Approximately 0.582 km of the pipeline to be remediated is within the North Norfolk Sandbanks and Saturn Reef SAC, 4.266km within the Southern North Sea SAC, 4.382 km within the Haisborough Hammond and Winterton SAC with 0.326km within each of the Greater Wash SPA and Cromer Shoal Chalk Beds Marine Conservation Zone (MCZ).

The water depth in the vicinity of the deposit areas vary between 16 and 46 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.

Part of the project location is within the Southern North Sea SAC, designated for harbour porpoise, within the North Norfolk Sandbanks and Saturn Reef (NNS) Special Area of Conservation (SAC), designated for Annex I sub-tidal sandbank and reef features, within Haisborough Hammond and Winterton (HHW) SAC also designated for sandbank and reef and within the Greater Wash SPA designated for Annex I qualifying bird species (red throated diver, little gull, little/ sandwich/ common



term and migratory species - common scoter and within the Cromer Shoal Chalk Beds MCZ designated for a broad range of habitats including infra/ circa littoral rock of moderate/ high energy, subtidal chalk, coarse/ mixed sediments, sand, peat and clay exposures and the North Norfolk subtidal coast.

Sabellaria spinulosa reefs is considered to be potentially present within the vicinity of the pipeline and one mattress location which is within the North Norfolk Sandbanks and Saturn Reef SAC. Recent surveys indicated there was 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 have extensive oil and gas infrastructure. The closest operational offshore wind farm, consented in 2017, Dudgeon Offshore Wind Farm, is located approximately 33km 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 118 mattresses along the pipeline. This will cause seabed disturbance and loss of soft sediment habitat in an area of up to 1982m² along the pipeline corridor. This is a conservative estimate as it assumes that all the deposit material 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 PL23 one concrete mattress may be placed in an area where a lower confidence of Sabellaria has been identified, ROV works will guide the works at the location to enable avoidance where possible. 1 concrete mattress is proposed proximate to an area of lower-level confidence. Remediation at one location on PL23 will be within the NNSR SAC which equates to less than 0.00004% of the total NNSR 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. This being the case, the supporting habitat for harbour porpoise in the Southern North Sea SAC will have no discernible impacts. 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.

77 concrete mattresses are proposed to be placed on PL23 within the Haisborough Hammond and Winterton SAC equating to 0.00009% of its area with no significant impact on its qualifying Annex I sandbanks slightly covered by sea water all the time and biogenic Sabellaria reef. Two mattress stabilisation locations equating to 35 mattresses are in the Greater Wash SPA which also encompasses the Cromer Shoal Chalk Beds MCZ (0.002% of the latter sites area) with no discernible impact on either qualifying Annex I bird species or supporting/ protected habitat.

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:

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Not applicable for the proposed activities.