

Our Ref: 01.01.01.01-5285U
UKOP Doc Ref:1223611



Offshore Petroleum Regulator
for Environment & Decommissioning

BP EXPLORATION OPERATING COMPANY LIMITED
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Registered No.: 00305943

Date: 2nd September 2022

Department for Business, Energy
& Industrial Strategy

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Crimon Place
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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**

MADOES Pipeline Inspection PL1947

A screening direction for the project detailed in your application, reference PL/2289/0 (Version 3), dated 1st September 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**

MADOES Pipeline Inspection PL1947

PL/2289/0 (Version 3)

Whereas BP EXPLORATION OPERATING COMPANY LIMITED has made an application dated 1st September 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/4145.

Effective Date: 2nd September 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 2 September 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

3 Nature of stabilisation or protection materials

Rock deposits

1250 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

At the locations specified in the SAT.

5 Prevention of pollution

The holder of the screening direction must ensure that appropriate measures are taken to minimise discharges, emissions and waste, in particular through the appropriate use of technology; and to ensure that necessary measures are taken to prevent incidents affecting the environment or, where they occur, to limit their consequences in relation to the environment.

6 Inspections

Should the Department consider it necessary or expedient for an inspector appointed by the Secretary of State to investigate whether the conditions of the screening direction are being complied with, the holder of the screening direction shall afford the inspector with such facilities and assistance as the inspector considers necessary to exercise the powers conferred by the regulations. The holder of the screening



direction shall additionally ensure that copies (electronic or paper) of the screening direction and any other relevant documents are available for inspection by the inspector at:

- a) the premises of the holder of the screening direction; and
- b) the facilities undertaking the project covered by the screening direction.

7 Monitoring

The results of any pre or post-placement surveys carried out to confirm the necessity for the deposits covered by the screening direction and/or to confirm the accurate positioning of the stabilisation or protection materials, should be forwarded to the Department following completion of the surveys

8 Check monitoring

Should the Department consider it necessary or expedient to undertake an independent monitoring programme to assess the impact of the project covered by the screening direction, the screening direction holder shall afford the Department with such facilities and assistance as the Department considers necessary to undertake the work.

9 Atmospheric emissions returns

Following completion of the project covered by the screening direction, the holder of the screening direction shall report all relevant atmospheric emissions, such as combustion emissions, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting forms.

10 Deposit returns

The holder of the screening direction shall submit a report to the Department following completion of the deposit covered by the screening direction, confirming the quantity of materials deposited and the estimated area of impact, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting form. Where no deposits are made, a 'nil' return is required.

11 Unauthorised deposits

Following completion of the project covered by the screening direction, the holder of the screening direction shall recover any materials accidentally or temporarily deposited on the seabed, such as debris, temporary containers, structures or deposits, or scientific instruments, and shall return the materials to land. If it is not possible to recover any of these deposits, full details of the materials remaining on the seabed must be reported to the Department in accordance with the requirements of Petroleum Operations Notice No.2 (PON2).

12 Screening direction variation



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/2289/0 (Version 3) - 2nd September 2022

The Operator is required to address the following comments in a variation to this application by 9th September 2022:-

- Please insert the text relating to snagging due to the spoil heaps.

- Section 3.3.3.2 - It is stated that faunal burrows have been assessed as frequent in the area which JNCC consider an indication of the presence of OSPAR habitat 'sea-pen and burrowing megafauna communities. However, there is no discussion of this in Section 4.4.2.3 and how disturbance of these species can be mitigated against.

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



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

The following provides a summary of the assessments undertaken by OPRED to determine whether an Environmental Impact Assessment is required for this project, 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 Assessment 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, 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:-

Summary of the project

Dredging the seabed and Inspection of a 21.573 m length of the Madoes pipeline (PL1947) and backfilling with rock aggregate.

Description of project

PL1947 is a production pipeline running from the Madoes wells to the ETAP central processing facility (CPF) Platform in the central North Sea (CNS). Operations will be conducted from a Remote Operated Vehicle (ROV) from the Normand Subsea (Subsea 7) vessel which will be dynamically positioned over the pipeline. Operations are expected to last for approximately 10 days.



The primary objective is to inspect the pipeline, this will include dredging the seabed to expose the pipeline and on completion of the inspection, backfill with aggregate of CP32/90 grade to re-protect the pipeline.

Operations will be carried out in the following stages:

1. Dredge seabed. All dredging works, and placement of the spoil heap, will be in proximity of the pipeline within the pipeline corridor.
2. Clean pipe surface.
3. Inspect pipe.
4. Cathodic Protection (CP) survey (if applicable).
5. Backfill the trench with CP32/90 aggregate, and
6. As-left survey.

Operations require PL1947 to be exposed for the pipeline to be inspected, this will require the seabed to be dredged along a section of the length of the pipeline (21.57 m) at a width of 9.57 m, totalling a footprint of 206.4 m². The dredged seabed material will be placed as temporary spoil heaps within the corridor, with approximately 325 m³ of material being dredged, creating a worst-case estimate spoil heap footprint of 2140 m². Once the pipeline has been inspected the pipeline will be re-protected using 1250 tonnes rock aggregate (CP32/90 grade 16mm-125mm). Rocks will be placed on the seabed by bags which will place the aggregate into the dredged area just above the seabed. The bags will be recovered to the surface following rock deposition. This backfill will be the same length and width of the dredged area, totalling a footprint of 206.4 m².

No cumulative interactions are foreseen with any other existing or approved projects. There is no risk to human health from the works to install the pipelines or depositing the protective materials on the seabed. There is no credible potential for a major accident or disaster to affect this project.

Any wastes associated with the project will be handled appropriately and no significant impacts are anticipated. The project is not at risk from natural disasters given its location in UK offshore waters.

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 is located in the United Kingdom continental shelf (UKCS) in the



Central North Sea (CNS), Block 22/23 and is approximately 197.5km to the east of the Scottish coastline and 49.9km to the west of the United Kingdom (UK)/Norway median line, at the closest point. Water depth in the area of operations ranges from 93 - 96 m.

The seabed in the vicinity of the operations comprises of circalittoral muddy sand (European Nature Information System [EUNIS] Habitat A5.26), with patches specifically at madoes of circalittoral mixed sediment (EUNIS Habitat A5.44). Specific site surveys determined that the sediment distribution within the Madoes area is uniformly distributed, comprising primarily of sand and shelly fragments.

Within the circalittoral fine mud habitat, the sea pens *P. phosphorea* and *V. mirabilis* were observed across the site. Using the SACFOR (Super-abundant, Abundant, Common, Frequent, Occasional and Rare) abundance of *P. phosphorea* was considered to be rare to frequent whilst abundance of *V. mirabilis* was considered occasional and frequent.

The closest known area with potential submarine structure made by leaking gases is located 17 km away from the location of the project.

Operations will occur within the East of Gannet and Montrose Fields NCMPA, which is designated in order to protect ocean quahog. The closest known ocean quahog aggregations have been recorded as occurring approximately 27km from the project area.

The project works may take place during nursery and spawning periods for several species of fish.

The most commonly observed species in the project area during the operational period (September to December) are: White-beaked dolphin, White Sided dolphin and Harbour porpoise.

The Seabird Oil Sensitivity Index (SOSI) in Block 22/23 low all year round. During the operational period (September to December) seabird sensitivity is expected to be low to high in the project area and the surrounding blocks

The project area is in a location where fishing effort is moderate to high throughout the year.

The project area is within an area of low shipping density.

There are a number of other oil and gas developments in the surrounding area. No aggregate dredging and disposal sites, sites of marine archaeological interests, planned offshore renewable energy developments or recreational sailing routes have been identified within 40km of the worksite.

Given the location of the project, the areas identified at paragraphs 2(c)(i), (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 impacts on the environment from the activities associated with the project were assessed, with particular focus on the predominant impacts resulting from the physical presence of the vessel and installed deposits and seabed disturbance resulting from dredging and the deposit of those materials.

Other than the matters considered further below, there is not likely to be any significant impact arising from the project on population and human health.

The spoil heap of dredged seabed material will be placed within the original pipeline corridor. It is expected that bottom currents will gradually re-suspend and mobilise the dredged material, spreading it over a larger area and reducing the depth of the material. The dredged material will not be used to backfill the trench as it is expected that the currents would rapidly erode the repositioned material thus providing insufficient long-term protection

1250 tonnes rock aggregate (CP32/90 grade 16mm-125mm) will be placed on the seabed by bags which will place the aggregate into the dredged area just above the seabed. The bags will be recovered to the surface following rock deposition.

The operation is likely to result in a worst-case seabed footprint of 2,346.4 m² from the dredging and permanent deposits. These deposits and dredging will be contained within the boundaries of the pipeline corridor. The addition of these new deposits is likely to present a localised impact within the operational area and is unlikely to present a large impact to the already developed area of subsea infrastructure and deposits. At the backfilling deposition point, it is anticipated that colonisation by hard substrate dwelling organisms will occur.

The physical presence of the project vessel and any associated noise levels and/or any resulting emissions associated with the proposed operation are unlikely to constitute a significant risk to the environment.

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

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

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adverse effects on the environment:

N/A