

Our Ref: 01.01.01.01-5270U
UKOP Doc Ref:1224432



Offshore Petroleum Regulator
for Environment & Decommissioning

TAQA BRATANI LIMITED
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Registered No.: 05975475

Date: 7th September 2022

Department for Business, Energy
& Industrial Strategy

AB1 Building
Crimon Place
Aberdeen
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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**

Brae Bravo gas by-pass pipeline (PL4164, PL895 & by-pass tee/SSIV)

A screening direction for the project detailed in your application, reference PL/2287/0 (Version 2), 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**

Brae Bravo gas by-pass pipeline (PL4164, PL895 & by-pass tee/SSIV)

PL/2287/0 (Version 2)

Whereas TAQA BRATANI 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/4213.

Effective Date: 7th 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 7 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

11, 000 tonnes of clean, inert rock material, containing minimal fines, (The quantity of rock deposited should be the minimum required to provide the necessary stabilisation or protection, and any surplus rock must be returned to land).

4 Location of pipeline and stabilisation or protection materials

Within an area bounded by the coordinates as per the application.

5 Prevention of pollution

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

6 Inspections

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



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

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

7 Monitoring

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

8 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

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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:

There are no comments at this time.

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

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

Summary of project

With removal of the topsides and partial removal of the jacket, the Brae Bravo gas by-pass line is at risk of interaction with other seabed users given the lack of the physical presence of the Brae Bravo installation. It is out with its original design philosophy (which was surface laid as multiple spools), given that it was initially thought to be decommissioned at the same time as the Brae Bravo installation. However, an 'early' removal opportunity for the Bravo installation means that the by-pass line now remains operational with the absence of the Bravo platform, exposing the unprotected pipeline. Furthermore, significant scour and spanning has been observed in recent surveys along the gas by-pass line. TAQA are proposing to provide rock protection to ensure the safety of the pipeline and ensure that potential further scouring does not require emergency rectification.

The OGA pipeline works authorisation request to lay 11,000 tonnes of by Taqa Bratani Limited is PA/4213. A maximum of 11,000 tonnes is required to protect the gas by-pass line (which includes PL4164 and PL895 and the Bypass Tee/subsea isolation valve (SSIV)), with works to commence 8th Sept 2022.

Description of project

The Brae Bravo gas by-pass line was originally built to allow continued production from East Brae to be exported to Brae Alpha, whilst the Brae Bravo installation was being dismantled and removed. It re-routed gas around the Brae Bravo installation and isolated it fully from the Brae Bravo process infrastructure, which it had previously been connected to. The 18" gas transfer pipeline (PL895) travels from the East Brae platform, 15 km to the Brae Bravo subsea bypass pipeline (PL4164). The subsea gas by-pass line is located in block 16/07a. Due to the removal of the Brae Bravo topsides and jacket structure, the subsea gas by-pass line (pipelines PL4164, part of PL895 and the Bypass Tee / SSIV XXV 6310 (a connector between PL4164 and PL895)) are exposed to the risk of inadvertent trawling. The gas by-pass line partially circumnavigates the Brae Bravo to the north of the installation and runs for approx. 830.58 m. The Brae Bravo installation consisted of a main platform and a co-located flare tower. The Brae Bravo jacket was removed in June 2022 and at this point the existing 500 m safety zone ceased. When the existing 500m safety zone ceased, TAQA applied for and were granted a new 500m safety zone for the subsea isolation valve (XXV 6310). However, the lack of a physical topsides structure is believed to expose subsea infrastructure (pipelines PL4164, PL895 and the Bypass Tee / SSIV XXV 6310) to possible interaction with fishing gear. Furthermore,



significant scour and spanning has been observed in recent surveys along the gas by-pass line. This infrastructure therefore requires over trawlable rock placement to prevent any physical damage from interactions but also minimises the risk of emergency span rectification.

The Tiffany field utilises the Brae Bravo gas pipeline, being gas deficient during start-up operations and providing a surplus of gas during stable operations. Access to a gas feed and export path is essential for Tiffany's continued production, which is expected beyond that of the lifespan of the remaining Brae Area.

Permanent seabed deposits will be required to provide protection and stabilisation of the gas by-pass line, following the removal of the Brae Bravo jacket. Deposits will be made on pipelines (PL4164 & PL895) and the by-pass tee/SSIV XXV 6310 in order to protect this infrastructure. Graded rock will be delivered from a directable fall-pipe vessel over a period of 6 days to provide protection as a linear berm along the pipelines. In total, approximately 11,000 tonnes of rock will be deposited across the two pipelines (8,545 tonnes for PL4164 and 2,455 tonnes for PL895), which includes contingency volumes and incorporates the bypass tee. The rock berm will approximately be 7 m wide and have a slope of 3:1, however, rock coverage on the Bypass Tee / XXV 6310 will be approximately 18 m wide.

In order to reduce impacts to the seabed, the rock material will be placed as accurately as possible. Rock placement will be undertaken by a Flexible Fall Pipe Vessel (FFPV) which allows the operation to be conducted in close proximity and directly above the pipeline, typically 9 m. The size and grade of rock has been selected to be between 1 and 5", with a maximum of 6" and is deposited via a string of bottomless heavy bucket, extending beneath the vessel to a position just above the seabed where the material is to be placed. The fall pipe is accurately guided into place by a Remotely Operated Vehicle (ROV) which has a camera which monitors placement in real time, allowing high confidence in accurate placement of the rock.

A Hazard Identification and Risk Assessment (HIRA) will be performed prior to execution, which includes all internal TAQA stakeholders to ensure that the control measures can be considered As Low As Reasonably Possible (ALARP), and a safe operation without the requirement to depressurise the pipeline.

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.

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 Brae Bravo platform was located in the Central North Sea (CNS) in United



Kingdom Continental Shelf (UKCS) Block 16/07a, approximately 188 km south-east of Fair Isle, 14 km west of the UK/Norway boundary line, in a water depth of 99 m.

The project area is not located within any protected areas. The proposed operations are located 20 km from the nearest protected area (Braemar Pockmarks SAC) which is designated for Annex I habitat 'submarine structures made by leaking gases'. The closest Nature Conservation Marine Protected Area (NC MPA) is the Central Fladen NC MPA, located >60 km from Brae Bravo. This site is designated for the protection of burrowed mud (seapens and burrowing megafauna and tall seapen components) as well as a sub-tunnel valley representative of the Fladen Deeps Key Geodiversity Area. The project is within the Scottish National Marine Plan area.

During surveys, Ocean Quahogs (mostly juvenile) were recorded across the Brae Bravo and Brae Alpha areas, associated with abundances of individuals from 'frequent' to 'common'. Densities of ocean quahog are relatively stable across the survey areas around Brae Bravo and across the years. This bivalve is a PMF in Scotland and is on the OSPAR List of Threatened and/or Declining Species and Habitats. It is widespread in the North Sea and is usually found at water depths greater than 30 m (OSPAR, 2010). The seapens (*V. mirabilis* and *P. phosphorea*), as well as faunal tracks and burrows have been recorded in the area during previous surveys, although in low or very low abundances. Whilst some burrows were also observed, they did not form a prominent feature of the seabed. Nevertheless, the presence of burrows and seapen species indicates that there is potential for the presence of OSPAR listed threatened and/or declining habitat 'Sea pens and burrowing megafauna communities' to occur within the area. No other protected species or habitats or seabed features of conservation importance have been identified in the Brae Bravo surveys.

Residual water movement in the region is generally to the south-east, with tidal current velocities between 0.01 - 1.0 m/s during mean spring tides and a mean residual current in the area of 0.13 m/s. Prevailing winds are from the southwest and north-northeast. Wind strengths in winter typically range between 6-11 m/s, with winds >8 m/s recorded 60-65% of the time. In summer, this reduces to 22-27%. The wave height within the Brae Bravo area ranges from 1.81 m-2.10 m and the annual mean wave power is between 30.1 - 36 KW/m, typical of the wider area.

The seabed of the Brae Bravo area is made up of soft sediments supporting a diverse range of infaunal species such as polychaetes, amphipods as well as bivalves and echinoderms. The seabed topography of the Brae area is characterised by a featureless, sandy seabed and is relatively flat. Pockmarks are widespread in the North Sea but there are no pockmarks in the immediate vicinity of the Brae Bravo platform, although pockmarks of varying sizes (5m to 10 m) have been identified southwest of the platform in the Fladen ground and to the north in the Braemar area. In the wider region, including south, north and west of the Brae Bravo platform, the habitat is classified as 'deep circalittoral mud'. Surveys in the Brae area characterised sediments as ranging from muddy sand to coarse silt, with a silt/clay content of 8.3 - 25.6% with a median of 15.1%, with sediments beyond 8km to the south and west tending to be coarser and less muddy.



Whilst the Brae Bravo area covers spawning grounds for cod, mackerel, Norway lobster, Norway pout and saithe (with the Norway pout observing higher spawning concentrations), only Norway lobster and saithe spawn during the proposed operations. The area also observes nursery grounds for a multitude of commercial species, of which the following species are also listed as PMFs: anglerfish, blue whiting, cod, herring, ling, mackerel, Norway pout, sandeel, saithe and whiting. Although some burrows were observed during survey activities, they did not form a prominent feature of the seabed which indicates limited importance of Norway lobster in the Brae Bravo area.

The area is located within the ICES Rectangle 46F1 which targets primarily demersal species which account for 58% of landing live-weight. However, this type of fishing is secondary in terms of value (approximately 43% of value for 2021). Shellfish species account for the rest of the catch and is the prime economic value of the fishing undertaken. No pelagic catch was recorded in 2021. A total value of £685,441,244 was landed in the UKCS in 2021, contributing to 0.16% of landing live-weight and 0.30% of value when compared to overall UKCS. The area is seen to be fished at the same intensity as the surrounding blocks in the North Sea, which is relatively moderate. However the proposed operations are unlikely to impact fishing activities as they will be primarily contained within the 500 m safety zone, which formally excludes fishing.

Harbour porpoise and minke whale have both been recorded in the area at low densities, whereas white-beaked dolphin have been recorded at moderate densities and Atlantic white-sided dolphin at low to moderate densities in the Brae Bravo area. All species that have been sighted in the vicinity are listed as PMF and species of national importance (European protected species). Grey and harbour seals are unlikely to be encountered regularly at this distance offshore.

Seabird sensitivity in Block 16/07 is extremely high in May as birds disperse from their breeding colonies into the North Sea. Sensitivity is also increased by the presence of flightless, moulting adult and juvenile auks. Sensitivity is low for the remainder of the year with no data available for November and December. In addition, the proposed operations are located approximately 188 km from the nearest UK coast and is therefore remote from sensitive seabird breeding areas on the coast. Seabirds recorded in the project area include northern fulmar, shearwater, storm petrel, gannet, skua, kittiwake, gulls, terns, common guillemot, razorbill, auk and Atlantic puffin.

The proposed operations are in an area that experiences low shipping intensity. The nearest active oil and gas activity is 11 km away to the south west at Brae Alpha, although the decommissioned Miller area is 5km to the south-east. There are no military restrictions and there are no known military activities within the area. There are no cables in the immediate vicinity of the proposed operations. The nearest proposed offshore wind development is the demonstrator floating windfarm, Buchan Deep Demonstration which is >200 km to the south-west, with the closest sectoral plan for potential development being NE7 109 km north-east of Block 16/07. There



are no aquaculture sites within the area.

Brae Bravo developed a drill cuttings pile from the historic use and discharge of oil-based muds, the discharge of which was effectively banned in 2001. The drill cuttings pile covers an area approximately 90 by 140 m, predominantly underneath the original installation footprint.

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, physical presence, 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.

Atmospheric emissions will result from the power generation from the fall pipe vessel. Assessment indicates that the project will generate a minor and negligible proportion of shipping and UKCS oil and gas emissions which will rapidly disperse offshore. Vessel emissions will be minimised, optimising deployment, compliance with MARPOL emissions standards and other shipping requirements with no likely significant effect on air quality. Whilst it is recognised that atmospheric emissions contribute to climate change, TAQA have included energy efficiency and emissions as a differentiating factor in selecting contractors which has thereby minimised this contribution as far as possible.

The vessel will work on site for a maximum of 6 days. There is no negative impact on access to other sea users as the works will all be within the 500m safety zone, which formally excludes other sea users. The operator will be required to communicate with vessels and notify activities to keep other users informed as per standard shipping regulations. There are therefore no significant navigational concerns.

At 20 km distant from the proposed operations, no impacts on the Braemar Pockmarks SAC are expected due to their localised nature and short-lived duration. Deposit of rock could impact a potential area of 0.0058 km² of seabed habitat which includes ocean quahog, 'seapens and burrowing megafauna' and 'deep circalittoral muds'. Seapen species are not sensitive to smothering and studies suggest that all species of seapens are likely to recover quickly. Ocean quahog in the surrounding area are likely to be resilient to the minimal sediment disturbance generated by deposition. While any habitat or species directly under the deposit would be impacted, this is a negligible area. Depositing rock will result in a small loss of the



general seabed habitat and species limited to the footprint of the deposit. The impact of the rock is very small and not considered significant, given the extensive nature of these habitats and species in the area.

Spawning is not considered to be impacted by virtue of the highly localised footprint of the proposed operations. Indeed, benthic spawning species present, spawn out with the proposed operational window in any case, with the exception of the Norway lobster. However, the Norway lobster spawn over a large area of the North Sea and whilst it is conceivable that some individuals could be impacted, the proposed operations will not impact at a population level.

The legacy drill cuttings pile is approximately 80 m from the pipelines at the closest point. Accounting for the berm of the rock, deposits will be approximately 75 m from the nearest point of the cuttings pile therefore it is not anticipated that there will be any re-suspension of or disturbance to, the cuttings pile from the rock placement.

Low to moderate densities of cetaceans (Atlantic white-sided dolphin, harbour porpoise, minke whale and white-beaked dolphin) and very low densities of pinnipeds (grey and harbour seals) suggest a low risk of interaction with any noisy activities. Furthermore, cetaceans and pinnipeds show natural avoidance behaviour and are not considered to be significantly affected by general ship noise. Additional noise generated by the proposed fall-pipe operation will result in only a small increase in ambient noise and is of limited duration such that noise impacts are not considered to be significant.

Whilst fishing is deemed relatively moderate in the area, the proposed operations are unlikely to negatively impact fishing activities as they will be contained within the 500 m safety zone, which is formally excluded from fishing activities.

Although not a planned activity, an unplanned release of diesel from the proposed operations was assessed, including the potential for operations to rupture the pipeline. Risk from the proposed activities were determined as low as reasonably practical by virtue of mitigation and control measures in place to ensure the integrity of the pipeline at all times. The gas by-pass line conveys only gas and therefore the only risk of an oil spill is considered to be from the fall-pipe vessel itself, which is subject to a Shipboard Oil Pollution Emergency Plan. The proposed operations carried out as planned are not likely to have a significant effect on the environment and the probability of a significant release from the proposed operations is negligible.

No planned construction operations, no aggregate dredging, military practice sites, sites of marine archaeological interests or aquaculture sites were reported within the local vicinity of the proposed operations.

The proposal aligns with the policies in the National Marine Plan.

No objections were received from the consultees for the proposed operations. It is considered that the proposed operations to protect the PL4146 and PL895 with 11,000 tonnes of rock graded material 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.

2) 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.

3) 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:

NA