

Our Ref: 01.01.01.01-5383U
UKOP Doc Ref:1233186



Offshore Petroleum Regulator
for Environment & Decommissioning

DANA PETROLEUM (E&P) LIMITED
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Registered No.: 02294746

Date: 27th October 2022

Department for Business, Energy
& Industrial Strategy

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Crimon Place
Aberdeen
AB10 1BJ

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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 PL1650**

A screening direction for the project detailed in your application, reference PL/2325/0 (Version 1), dated 25th October 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 PL1650

PL/2325/0 (Version 1)

Whereas DANA PETROLEUM (E&P) LIMITED has made an application dated 25th October 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, OGA Ref: PA/4391.

Effective Date: 27th October 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 28 October 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

Grout bags deposits

30 (Thirty) tonnes of grout contained within 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).

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 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:

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
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

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

Span remediation of the water injection pipeline (PL1650) and associated piggy backed gas lift pipeline (PL1649) located in the Bittern field following rupture of the water injection line which expelled sediment around it resulting in a 2m (deep) x 11m (long) x 8m (wide) crater. A dive support vessel, Seven Kestral will be deployed to place 30 tonnes of biodegradable hessian bags containing grout around both pipelines on 28th October 2022 as per deposit consent application, OGA reference PA/4391 to stabilise and protect them and remove snag risk.

Description of project

The water injection pipeline (PL1650) and gas lift pipeline (PL1649) were trenched



and buried when laid in the Bittern field. They connect Triton FPSO injection riser base in UK continental shelf (UKCS) block 21/30 to Bittern field Drill Centre B manifold (DCB) in block 29/1, 20km apart. A rupture has been identified at the base of the water injection line, located in block 28/5, 10km from the FPSO water injection riser base. This has expelled sediment surrounding PL1650 and the attached piggybacked gas injection pipeline creating a 2m (deep) x 8m (wide) x 11m (long) crater. This poses a risk to towed fishing gear and additional risk to the unsupported gas injection pipeline.

Thirty tonnes of biodegradable hessian grout bags containing grout (1,200 bags in total weighing 25kg each and measuring 0.45m x 0.25m x 0.125m) will be placed by divers to support and protect the pipelines. A deposit consent, reference PA/4391 has been submitted to the OGA (North Sea Transition Authority).

The risk of an unplanned diesel release from the vessel involved with the operations has been considered and is covered by a vessel Ship Oil Pollution Emergency Plan (SOPEP). The work is required to support and protect both the water and gas injection pipeline. The developer has control measures 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.

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 is located in the Bittern field development area. This consists of subsea wells tying production back to Triton Floating Production Storage and Offloading (FPSO) vessel operated by Dana Petroleum (E&P) Limited (Dana). The Bittern water injection line PL1650 and piggy-backed gas lift line PL1649) run between the water injection riser base at Triton FPSO located in UKCS quadrant/block 21/30 and the Bittern field drill centre B (DCB) manifold located in block 29/1. The project site is situated 10km from the Triton FPSO water injection riser base in UKCS block 28/5 in the central North Sea (CNS), approximately 174km from the UK coast and 85km from the median line.

The development is not located within any protected areas. The Scanner Pockmark Special Protected Area (SAC) is approximately 141 km to the north. There is no evidence of Annex I habitats of submarine structures made by leaking gases or reef.



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 10.6 km to the north east, designated for OSPAR listed as threatened and/ or in decline ocean quahog aggregations (including sands and gravels as their supporting habitat as well as offshore deep sea mud habitat supporting diverse species including sea urchins, sea cucumbers, worms and molluscs. The 2015 survey found the OSPAR listed as threatened and/ or in decline ocean quahog in the Greater Guillemot Area at the majority of stations but in low numbers and as juveniles but none were found during the Bittern 2018 survey. Quahog can withdraw their siphons and be difficult to observe at the surface so may be present. No evidence of Annex I habitats or communities of conservation value were found during this survey. Sea pen were recorded as common or frequent, but it was not clear what fauna created the burrows. In the absence of survey evidence, it is assumed that the PMF habitat 'burrowed mud' and biotope 'sea pen and burrowing megafauna in circalittoral fine mud' and OSPAR listed as threatened and or in decline habitat 'sea pen and burrowing megafauna communities' is present.

Recent environmental baseline survey data (2015) of the Greater Guillemot Area, recorded water depth at the site of 96m, average residual current of 0.1m/s and spring tide peak flow of 0.01 m/s in open water. Winds prevail from the southwest and NNE, 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 'muddy sand' (National Marine Plan interactive) and classed broadly as 'Offshore circalittoral sand' (EUNIS) with 'circalittoral mixed sediment' with shell debris and cobbles. Bittern survey area is classed as 'circalittoral sandy mud' and 'offshore subtidal sands and gravels', a Priority Marine Feature (PMF) occurs at Bittern field. The 2015 survey identified fine sand and very fine sand with a subsequent survey done in 2018 confirming mud or sandy mud at Bittern, backed up by cohesive muddy sediment with faunal tracks and burrows observed on recent imaging at the site.

The 2015 survey in the Greater Guillemot Area identified 240 species, broadly similar to benthic species in the wider region with 50% of the species being polychaetes and brittle star, molluscs, seapen (*Pennatula phosphorea* and *Virgularia mirabilis* observed), white curved tubes of *Ditropa* species (a serpulid polychaete) and star fish at a few survey stations which aligned with previous survey results in 2005. Bittern survey results confirmed hermit crab, starfish, scallops, swimming crab and nudibranch with burrowing Norway lobster and shell debris, enabling attachment of hydroid/ bryozoan turf, sea squirt, anemone and sponge Porifera.

Pelagic fish observed include flat and hagfish, dragonets and ray. The proposed project is located in International Council for the Exploration of the Sea (ICES) Rectangle 42F0 with several spawning and nursery species. PMF of note include anglerfish, blue whiting, cod, mackerel, sandeel, Norway pout, spurdog and whiting, cod also being OSPAR listed. Sandeel spawn in November and are unlikely to be present due to the silt and clay content of sediment at Bittern.



Fisheries mostly targeted shellfish between 2019 and 2021 with the highest landings weight and value, but overall effort is small in a UK context and low during the proposed project period with trawl gear dominating.

Harbour porpoise and white beaked dolphin are frequently encountered year-round. Additionally Atlantic white-sided, white-beaked, bottlenose and common dolphin and Minke whale have been observed in the vicinity of the proposed operations in low density throughout the year. All species are listed as PMF and species of national importance (European protected species). Grey and harbour seals are unlikely to be encountered regularly at the project site. The seals and harbour porpoise are Annex II listed species.

Outside the seabird breeding season at the coast which ends around June, birds disperse offshore. Seabirds present in the project area during the proposed development are likely to include northern fulmar, northern gannet, great skua, black headed kittiwake, species of gull (black backed, great black backed, lesser great black backed, herring) common guillemot, razorbill, little auk and Atlantic puffin some of which have been subject to declines in numbers. Seabird sensitivity to accidental spill is recorded as low in block 28/05.

There are four oil and gas installations within 40km of the site, low shipping intensity, no military restrictions, the nearest cable located some distance from the site, the North Sea Link Interconnector South and no observed wrecks.

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, underwater noise and accidental spills.

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 arise from the dive support vessel 'Seven Kestrel' being on site for 2 days. Assessment indicates that the project will generate a minimal 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.

A dive support vessel will be on location for a maximum of 2 days in an area of low



fishing and shipping. A guard vessel is on site at the span location and fishing vessels have been notified. The operator will be required to communicate with vessels and notify activities while divers are on site. There are no significant navigational concerns.

An area of 88m² of seabed was lost when PL1650 was ruptured which may have impacted, if present Norway lobster, the PMF 'burrowed mud', OSPAR listed habitat 'seapens and burrowing megafauna communities' and ocean quahog. Grout bags will be positioned by divers with little disturbance, recovery being on hard substrate. Loss and disturbance are minimal and not assessed to be significant.

The dive support vessel has dynamically positioned (DP) thrusters. DP's generate peak noise levels in the low frequency range. This can result in behavioural change such as masking in the immediate vicinity of a vessel. A low density of cetaceans is found in the area with infrequent visits by seals. Cetaceans show natural avoidance behaviour and are not considered to be adversely affected by the proposed operations. Noise impacts are therefore not considered to be significant.

Although not a planned activity, an unplanned release of diesel from the vessel was assessed. The developer has mitigation and control measures in place to prevent this. 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.

There is no planned construction operations, other activities or sites of marine archaeological interests in 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 stabilise the water injection and gas injection pipelines due to a span occurring with 1,200 x 25kg grout bags to remove snag hazard and prevent failure of the gas injection pipeline at the specified location 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 transboundary 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