Our Ref: 01.01.01.01-5511U UKOP Doc Ref:1260747

Offshore Petroleum Regulator for Environment & Decommissioning

ONE-DYAS UK LIMITED 100 BISHOPSGATE LONDON EC2N 4AG

Registered No.: 03531783

Date: 9th February 2023

Department for Business, Energy & Industrial Strategy

AB1 Building Crimon Place Aberdeen AB10 1BJ



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 FREESPAN RECTIFICATION - SEAN EXPORT PIPELINE PL311

A screening direction for the project detailed in your application, reference PL/2352/0 (Version 4), dated 9th February 2023 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 **Content on Content** 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

# FREESPAN RECTIFICATION - SEAN EXPORT PIPELINE PL311

# PL/2352/0 (Version 4)

Whereas ONE-DYAS UK LIMITED has made an application dated 9th February 2023, 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/4553.

Effective Date: 9th February 2023

## 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 9 February 2023 until 15 March 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 deposits

1,500 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

Latitude: Degree 52 Minute 56 Second 25.25 North

Longitude: Degree 02 Minute 11 Second 57.08 East

and

Latitude: Degree 52 Minute 56 Second 22.58 North

Longitude: Degree 02 Minute 11 Second 48.37 East

QUAD: 53 BLOCKS: 1 & 2

## **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



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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:

The Department have 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

## SCHEDULE OF SCREENING DIRECTION DECISION REASONS

# Sean Pipeline (PL311) Span Remediation, ONE DYAS UK LIMITED (herein after referred to as 'One Dyas')

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 (Offshore Petroleum Regulator for Environment and Decommissioning) 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 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 the Project

One Dyas requests to lay 1500 tonnes of graded 2" to 8" rock to urgently remediate two reportable spans which have developed along the 30" Sean Gas/ condensate pipeline (PL311) off the East coast of England. Rock will be deposited by a fall pipe vessel. The works are due to commence at the earliest 15th February 2023.

#### **Description of the Project**

Scouring was observed under the Sean export pipeline (PL311) during pipeline



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inspections in December 2022, where two spans which exceed the maximum safe length have developed in blocks 53/1 (Span 2) and 53/2 (Span 1). The spans are both in excess of the reporting requirement of 10m in length and 0.8m high and therefore are considered to pose a risk to navigation. In addition, the spans are beyond the allowable length for safety of the pipeline. One Dyas plan to rectify these by the deployment of rock to fill the voids under the pipeline with a berm of rock up to the pipeline centre, which will have a 1:3 overtrawlable profile. The rock berm will stabilise the pipeline and protect against further scour. In total, 1,500 tonnes of rock will be deployed at two locations, with the closest location being *circa* 48 km from land.

The rock will be deployed from a fall-pipe vessel. This method ensures accurate placement of the rock. Prior to and following rock placement, a multibeam echosounder survey (MBES) will be undertaken to confirm the exact position and status of the free-spans and to confirm adequate protection. The vessel will maintain station under dynamic positioning (DP) when laying the rock.

The NSTA pipeline works authorisation by One Dyas requests to lay 1,500 tonnes of rock. A maximum of 1.500 tonnes is required to stabilise the pipeline (PL311), with works to commence at the earliest 15th February 2023. Activities are expected to take 1 day and be completed by 15th March 2023.

The proposed span remediation of PL311 has not been included in any previous ES or screening direction. The Sean pipeline was originally installed under PLA/815.

## Location of the Project

Having regard, in particular, to the matters identified at paragraphs 2(a) to (c) of Schedule 5 to the Regulations, the environmental sensitivity of geographical areas likely to be affected by the project has been considered as follows:-

PL311 is operated by One Dyas and is located in the Southern North Sea, east of the Norfolk coast. It is a 30" pipeline which transports gas and condensate from the offshore Sean Papa complex to the Bacton Gas Terminal on the Norfolk coast. PL311 is a 106 km surface-laid pipeline. Two spans of concern have formed along PL311 in blocks 53/1 (Span 2) and 53/2 (Span 1), located some 48km from landfall of the pipeline. Operations will take place in water depths between 29 and 46.7m,

The project area is located within the Southern North Sea (Special Protection Area), designated for the protection of Harbour porpoise. There are several other conservation areas in the vicinity. The Haisborough, Hammond and Winterton (HHW) SAC, which is designated for two Annex I habitats: 'Sandbanks which are slightly covered by sea water all the time', and 'Reefs' is located approximately 0.5 km to the southwest of the nearest span location. The span locations are also situated approximately 6 km to the south of the North Norfolk Sandbanks and Saturn Reef SAC, at their closest point. The North Norfolk Sandbanks and Saturn Reef SAC is designated for the presence of Annex I reefs and Annex I sandbanks which are slightly covered by sea water all of the time. The pipeline spans also lie



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approximately 30 km from the Greater Wash SPA, designated for the protection of the following species: red-throated diver, common scoter, little gull, sandwich tern, common tern and little tern. In addition, the pipeline spans lie 34 km from the Outer Thames Estuary SPA. The Outer Thames Estuary is designated for the protection of wintering red-throated diver and breeding little terns and common terns.

The project is within the East Offshore Marine Plan.

The mean residual current surrounding the Sean pipeline is approximately 0.1 m/s (Wolf et al., 2016). Wind strengths are generally between Beaufort scale 1-6 (1-11 m/s) in the summer months with a greater proportion of strong to gale force winds of force 7-12 (14-32 m/s) in winter, generally from the South to the Northwest direction. The wave height at the deposit location ranges from 1.21 to 1.50 m and the annual mean wave power is between 6.1 and 12 kW/m.

Sediments in the Southern North Sea area are very mobile and sediment transportation is particularly active. The broad-scale habitat expected at each span location is 'Offshore Circalittoral Sand'. Such habitats tend to be characterised by a diverse range of polychaetes, amphipods, bivalves and echinoderms. Pipeline inspections conducted along PL311 in 2020 (30 - 50km from the span location but of the same broad habitat type) indicated that the seabed predominantly comprised sand, either rippled or not rippled, with varying density of shell fragments. There were also occasional areas of coarse sediment exhibiting pebble and cobble sized particles, one of these areas was interpreted as previously deposited rock armour.

Sessile epifauna previously observed along the Sean pipeline route included branching bryozoan sponges, anemones, and suspected *S. spinulosa* in one small area. Mobile epifauna included lobsters, crabs, starfish and fish. The *S, spinulosa* identified during the 2020 survey is located 30 - 50km from the proposed works. Whilst there is no site-specific information available on the infauna in the vicinity of the current span locations based on the nature of the sediment (predominantly mobile sand and mixed sediment), this is expected to comprise a relatively sparse community with pioneer species most abundant.

The location is identified as a potential spawning area for cod, plaice, sandeel, sole and whiting, during the proposed activities. In addition, the area is identified as a potential nursery ground for cod, herring lemon sole, mackerel, plaice, sandeel, sole, sprat, tope shark and whiting. The ICES rectangle is regarded as a high intensity spawning area for plaice. Spawning areas are regarded as more sensitive than nursery areas. Of the species identified as spawning over the proposed period of operations, plaice, sole and whiting are pelagic spawners and are therefore less likely to be impact by seabed disturbance or changes in habitat type. Sandeel and cod are particularly vulnerable due to either their benthic spawning nature (sandeel) or aggregative lekking mating behaviour (cod). Recent scientific reports indicate a lower probability of presence of sandeel in this area and that the area is likely to be a rare cod spawning area.

Blocks 53/1 and 53/2 lie within the International Council for the Exploration of the Sea



(ICES) Rectangle 34F2. Fish landed from this ICES rectangle were predominantly of demersal species, with average annual landings of 185 tonnes from all fishing. The area is seen to be fished roughly at the same intensity as the surrounding ICES rectangles which is relatively low representing 0.34% of UK weight landed and 0.06% (in 2021).

Harbour porpoise are the only cetacean species frequently sighted in the proposed licence block in moderate densities in the months of April, August, September and December. Given that no observations of harbour porpoise are recorded over the period of proposed work period and only in moderate densities outwith the proposed work period, no significant impacts on harbour porpoise are anticipated. The blocks are located in the summer area of the Southern North Sea SAC which sees increased densities of harbour porpoise over the summer months (April to September). As this activity will be completed by March, increased densities of harbour porpoise are not expected during the proposed works. Grey seals and Harbour seals may be present in this area but in low densities ((< 1 individuals per 25 km2). All cetacean and pinniped species are species of national importance (previously European Protected Species). Given the low presence of cetacean species and seals, coupled with the limited duration (1 day), significant impacts on these species are not anticipated.

Seabirds identified in Blocks 53/1 and 53/2 include the following species; northern fulmar, northern gannet, pomarine skua, Arctic skua, great skua, black-legged kittiwake Rissa, great black-backed gull, common gull, lesser black-backed gull, herring gull, Sandwich tern, common guillemot, razorbill, little auk and Atlantic puffin. The sensitivity of birds to surface oil pollution in the Blocks 53/1 and 53/2 ranges from low to extremely high with sensitivity classed as high to very high during the proposed operations. As the operation does not involve entering a reservoir and is a simple remediation of freespan operation, accidental events which have the potential to impact seabirds are not expected.

The proposed operations are in an area that experiences high to very high shipping. There are several wrecks recorded along the Sean pipeline. The closest wreck to the deposit location is classed as a non-dangerous wreck and is located 1.2 km northwest. There are a number of oil and gas installations located within the vicinity of the span locations with the closest being that of the Arthur manifold some 4.5km southeast. There are no aggregate extraction activities in the area and the closest aggregate resource is located 33km away. There are no military restrictions in either block. The closest power cable is located 13.5 km north-east at its closest point. The closest wind farm identified is located 8km away and is not yet built. The project is not likely to overlap with the timeline of these proposed works.

Previous works along the line include free span rectification work which was required in 2016 and 2021. In total, 8,179 tonnes of rock has previously been deposited along the pipeline, impacting an area of ca. 6,070 m2. There is no direct overlap between previous rock deposits and the proposed rock deposit area. Approximately 0.00102% of the Southern North Sea has been impacted by deposits (2011-2016). This deposit increases the total amount of deposits in the North Sea by 0.00102% which is not

considered significant,

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 effects on the environment from the activities associated with the project were assessed, including impacts arising from atmospheric emissions, seabed disturbance, physical presence, planned discharges, 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.

Limited atmospheric emissions of 49 tonnes of CO2(e) will result from the power generation from the deployment vessel. Assessment indicates that the project will generate a negligible proportion of shipping and UKCS oil and gas emissions which will rapidly disperse. Whilst it is recognised that atmospheric emissions contribute to climate change, One Dyas Vessel emissions will be minimised by minimising the number of days on site, with no likely significant effect on air quality.

The vessel will work on site for a maximum of 1 day. Given the very short duration of this scope, no negative impacts on access to other sea users is anticipated. The rectification of spans is a safety measure to reduce the likelihood of snagging from any benthic fishing gear. 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.

No marine discharges are planned.

Seabed impacts are expected to be localised in nature with the deposit of rock impacting a potential area of 0.000681 km2 of seabed habitat supporting organisms such as polychaetes, amphipods, bivalves and echinoderms. Given the sandy nature of the sediment, mobile sediment environment and careful placement of the rock using a fall-pipe vessel, significant turbidity of the water column above background levels is not anticipated. Depositing the rock will result in a negligible loss of the general seabed habitat and species limited to the footprint of the deposit, which is in close proximity to and under the existing pipeline. The impact of the rock is highly localised and therefore not considered significant, given the wider extent of these habitats and species in the area. The Sean Pipeline has recently been included in a comparative assessment as part of wider Sean decommissioning activities. The outcome of the assessment indicated the preferred option was to leave the rock protection associated with the pipeline in-situ.

Spawning is not considered to be impacted by virtue of the only benthic species spawning during the proposed operational window are cod and sandeel. Taking account of recent scientific publications which indicate the area is likely to be a 'rare'



spawning area for cod and low probability of presence of sandeel, the operation is unlikely to impact these species at a population level. Other species identified are pelagic spawners and are less likely to be impacted by the proposed works.

Vessel movements in themselves are not known to disturb cetacean and/or pinniped individuals. Noise generated from the MBES survey is expected to be of low frequency, below that readily detected by cetaceans. It should be noted that the operations occur within the Southern North Sea SAC designated for the protection of Harbour porpoise, However, as the noise sources associated with the operation are of low frequency and limited duration (1 day), marine mammals are not at risk from impacts from the vessel or its propulsion or the MBES survey proposed. Impacts on marine mammals, are therefore not considered to be significant.

One Dyas has added to the spans onto the Fish Safe system and have also agreed to formally report these. Fishing activity is low in the area and the proposal to rectify a potential safety issue to fishermen trawling over the pipeline is therefore unlikely to negatively impact fishing activities in the area.

An unplanned release of hydrocarbons associated with this activity is not considered likely. The hydrocarbons transported in this pipeline are gas and condensate which, if released, are likely to readily disperse / evaporate. Therefore, the only risk of an oil spill is considered to be from the deployment 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 considered low.

Impacts were considered specifically for the Southern North Sea SAC and which is the only site with potential to be impacted. The impact area identified of 0.000681 km2 is highly localised to the pipeline and therefore unlikely to impact the Haisborough, Hammond and Winterton (HHW) SAC, located 0.5km away or any of the other conservation designations identified. Likely significant effects were considered on the SNS SAC from the proposed operations, and it was determined that the proposed operations, alone or in combination with other plans or projects will not have a significant effect on this site.

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

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.

No objections were received from the consultees for the proposed operations. It is considered that the proposed operations to protect the Sean export pipeline with 1,500 tonnes of rock is not likely to have a significant impact. Given the limited impact area of this operation and other operations identified in the area, no cumulative impacts are expected to occur.

## 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:

N/A