

Our Ref: 01.01.01.01-5667U
UKOP Doc Ref:1281016



Offshore Petroleum Regulator
for Environment & Decommissioning

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

Date: 21st June 2023

Department for Energy Security &
Net Zero

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Crimon Place
Aberdeen
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Dear Sir / Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020
TRITON GAS EXPORT PIPELINE PL1645**

A screening direction for the project detailed in your application, reference PL/2374/0 (Version 2), dated 7th June 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 [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**

TRITON GAS EXPORT PIPELINE PL1645

PL/2374/0 (Version 2)

Whereas DANA PETROLEUM (E&P) LIMITED has made an application dated 7th June 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/4692.

Effective Date: 21st June 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 21 June 2023 until 31 December 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

142 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).

Concrete mattress deposits

4 concrete mattresses, each measuring 5 metres x 3 metres. (The number of mattresses deposited should be the minimum required to provide the necessary protection, and any surplus mattresses must be returned to land).

4 Location of pipeline and stabilisation or protection materials

Within an area bounded by the coordinates:

57 05 08.81 N

00 53 34.24 E

and

57 06 29.26 N

00 53 57.38 E



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:

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 Energy Security & Net Zero
AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [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

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 in Schedule 5 1(a) to (g) of the Regulations, the characteristics of the project include the following:

Summary of project

The Triton Gas Export pipeline, PL1645, has been subject to a life extension study which has recommended targeted subsea inspection to verify the condition of the pipeline and substantiate the existing corrosion. A review of the pipeline data by Origin Integrity Management has recommended that targeted inspection should be undertaken at two locations within the pipeline section between KP 0.23 to KP 0.30 and one location between KP 2.943 and KP 2.946. The purpose of these inspections is to identify any areas of wall thickness loss. At each of these three locations, the Gas Export pipeline is to be exposed, cleaned in preparation for inspection (scanning) operations and then back filled. A minimum 1 m length of pipeline at each location is to be scanned for signs of corrosion with full 360-degree coverage achieved.

Depth of burial survey will be conducted at all three locations, and data reviewed to determine lowest point of pipeline.

Remove concrete mattress and recover to deck at Locations 1 & 2 for



onshore disposal,
Excavate trench at all three locations to allow access to a 1m long section of the gas export pipeline for scanning operation
Multibeam survey of location 2 once 1m section of the pipeline has been exposed,
Non-destructive testing (NDT) inspection tool to be deployed and conduct corrosion scanning,
Backfill trench with crushed stone deployed from 1 tonne bulk bags,
Deploy new concrete mattresses at locations 1 & 2,
Conduct general visual inspection of worksite at locations 1 & 2
Conduct general visual inspection of the worksite at location 3 covering a 20 m x 20 m area.

Description of project

The Triton Gas Export pipeline (PL 1645) has been subject to a life extension study which has recommended targeted subsea inspection to verify the condition of the pipeline and substantiate the existing corrosion models. At each of the three scan locations, a 1 m long section of pipeline, with full 360-degree coverage, is to be scanned to collect sufficient inspection data to identify and characterise any areas of internal corrosion. The scopes of work will be undertaken at three locations along the Triton Gas Export pipeline.

The operation will be undertaken by a Remotely operated Vehicle (ROV) Support Vessel, the EDT Jane. The vessel will use Dynamic Positioning (DP). The operations will take 7 days to complete.

As part of the Triton Gas Export pipeline scope, old existing concrete mattresses will be removed at location 1 & 2 and replaced with new concrete mattresses. New rock will be required to provide protection for the pipeline at all three locations. 124 tonnes of rock will be deposited via 1 Te bulk bags. This volume includes 100% contingency. Once in position, the bulk bags will be cut to release the rock and the sack will be retrieved onboard.

All ancillary equipment deployed or deposited during the proposed operations (dredge frame) and any materials temporarily deposited on the seabed (utility baskets) shall be recovered as part of the operation and before the vessel demobilises from the worksite. Temporary seabed deposits will be required during the proposed operations (covered in DEPCON PA/4692).

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 locations for investigation on the Triton Gas Export pipeline lie within UKCS 21/30 within the CNS and is approximately 164 km east of Aberdeen, 85 km west of the UK/Norwegian boundary line and in a water depth of approximately 88 m. The Triton FPSO services the oil and gas fields of the Gannet E (Gannet Expansion), Evelyn and Bittern fields and the Greater Guillemot Areas (GGA). All fields tie back to the Triton FPSO via a series of pipelines, manifolds, riser bases and flexible risers. Oil is exported via a shuttle tanker and gas is exported via the Fulmar gas line to St Fergus. The gas export pipeline has been configured to allow gas import to Triton. Locations 1 and 2 are within the Triton 500m safety zone however location 3 is out with.

The project area is not located within any protected areas. The East of Gannet and Montrose MPA is 5 km northeast from location 1 and 2, and 3km from location 3. This site is 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. The proposed area of operations are remote from the East of Gannet and Montrose MPA, and unlikely to affect the area of deep-sea mud defined in JNCC (2014). In addition, the sediment samples recovered during survey work by Fugro (2015) consisted of fine or very fine sand, rather than mud or sandy mud.

There was no evidence of Annex I habitats of submarine structures made by leaking gases or reef within the operational areas.

Water depth at the three locations of approximately 88m, 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 North North East, 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.

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 *Ditrupa* species (a serpulid polychaete) and star fish at a few survey stations which aligned with previous survey results in 2005.



There are no areas of burrowed mud in the vicinity of the proposed operations (NMPi, 2023).

The proposed project is located in International Council for the Exploration of the Sea (ICES) Rectangle 43F0 with several spawning and nursery species. ICES rectangle 43F0 is located within an area experiencing high intensity spawning areas for sandeels *Ammodytidae* spp. and high concentration spawning for Norway pout *Trisopterus esmarkii* (Coull et al., 1998 and Ellis et al., 2012).

Locations 1 and 2 are within the Triton 500m exclusion zone, however location 3 is out with and therefore fisheries data has been assessed for this location.

Fisheries mostly targeted demersal species, which in 2021, accounted for 91% of landings and approximately 79% of value. ICES rectangle 43F0 contributed to 0.06% of landings and 0.06% of value when compared to overall UKCS (Scottish Government, 2022).

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 seal species and harbour porpoise are Annex II listed species.

Outside the seabird breeding season at the coast which ends around June, large numbers of moulting auks (common guillemot, razorbill *Alca torda* and Atlantic puffin *Fratercula arctica*) disperse from their coastal colonies and into the offshore waters. At this time these high numbers of birds are particularly vulnerable to oil pollution. In addition to auks, black-legged kittiwake, northern gannet *Morus bassanus*, and northern fulmar, are present in sizable numbers during the post breeding season. Seabird sensitivity to accidental spill is recorded as low in block 21/30.

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, 34km at the closest point. There are 40 non dangerous wrecks within 40km of the proposed operational area. The closest is an unknown wreck, located 4km to the northeast of location 1 and 2, and 8km from location 3.

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 vessel 'DSV - EDT Jane' being on site for 7 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. The proposed operations have been calculated to contribute to 0.0006% of the total atmospheric emissions associated with UK offshore activities in a year and no significant impact is therefore expected.

A dive support vessel will be on location for a maximum of 7 days in an area of low fishing and shipping. The operator will be required to communicate with vessels and notify activities while the vessel is onsite. There are no significant navigational concerns.

An area of 95.14m² of seabed inclusive of all three locations will be impacted. This disturbance is caused by the excavation required during the operations, excavated sediment from around the pipeline will be emitted from a discharge hose at the rear of the dredging skid and will dissipate rapidly in the marine environment. In terms of quantification of impact, the values for seabed area are based on the assumption that re-suspension of sediments due to the placement of mattresses is not considered to occur to any real extent from the placement of the seabed deposits. This is due to the fact that the seabed deposits will be lowered to the seabed and placed carefully into position. Re-suspension of sediments from around the localised excavation is anticipated to form a very thin layer due to the water depth and the current in the area, these deposits are not considered a new substrate. In addition, the excavated sediments will be from the area and therefore no change in sediment type is expected. Therefore any impacts from the re-suspension of excavated sediments it not considered 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.

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