

Our Ref: 01.01.01.01-5717U  
UKOP Doc Ref:1302490



Offshore Petroleum Regulator  
for Environment & Decommissioning

SHELL U.K. LIMITED  
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Registered No.: 00140141

Date: 20th October 2023

Department for Energy Security &  
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[OPRED@energysecurity.gov.uk](mailto:OPRED@energysecurity.gov.uk)

Dear Sir / Madam

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

**PIPELINE PL996 - Bacton to Clipper Phase 3 pipeline remediation**

I refer to your amended application dated 18th October 2023, reference PL/2383/2 (Version 3).

It has been determined that the proposed changes to the project is not likely to result in a significant effect on the environment, and therefore an environmental impact assessment is not required.

A screening direction is therefore issued for the changes to the project. An amended schedule of conditions, comments, and main reasons for the decision on the amended application, 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 [OPRED@energysecurity.gov.uk](mailto:OPRED@energysecurity.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 PL996 - Bacton to Clipper Phase 3 pipeline remediation**

**PL/2383/2 (Version 3)**

Whereas SHELL U.K. LIMITED has made an application dated 18th October 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/4731.



## **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 1 August 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: [OPRED@energysecurity.gov.uk](mailto:OPRED@energysecurity.gov.uk)

#### **3 Nature of stabilisation or protection materials**

Rock filter unit (RFU)

20 x 2 tonne RFU and 9 x 4 tonne RFU containing clean, inert rock (The quantity of rock deposited should be the minimum required to provide the necessary stabilisation or protection, and any surplus rock must be returned to land).

#### **4 Location of pipeline and stabilisation or protection materials**

at the locations detailed in the PL SAT.

#### **5 Prevention of pollution**

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

#### **6 Inspections**

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



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

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

## **7 Monitoring**

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

## **8 Check monitoring**

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

## **9 Atmospheric emissions returns**

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

## **10 Deposit returns**

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

## **11 Unauthorised deposits**

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

## **12 Screening direction variation**



In the event that the holder of the screening direction proposes changes to any of the particulars detailed in the application for a screening direction, the holder must notify the Department immediately and submit an application for a post screening direction amendment. The post screening direction must be in place prior to the amended proposals taking effect.

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## COMMENTS ON THE APPLICATION FOR SCREENING DIRECTION

### Section 1

The attention of screening direction holders is drawn to the following provisions regarding The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

1) You are deemed to have satisfied yourself that there are no barriers, legal or otherwise, to the carrying out of the project covered by the screening direction. The issue of a screening direction does not absolve the screening direction holder from obtaining such authorisations, consents etc that may be required under any other legislation.

2) The Department would draw your attention to the following comments:

The EAJ also captures deposits associated with the Cutter anchor removal (PA/4804) which are exempt under section 77(1)(b) of the Marine and Coastal Access Act- anything done for the purpose of constructing or maintaining a pipeline as respects any part of which an authorisation (within the meaning of Part 3 of the Petroleum Act 1998) is in force.

3) All communications relating to the screening direction should be addressed to:

OPRED@energysecurity.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. This document 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 relevant 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.

### **Summary of the Project**

This screening direction is for pipeline remediation works on the Bacton-Clipper Glycol pipeline (PL996) by the installation of the following protection materials:-

- 20 x 2 tonne Rock Filter Units (RFU)
- 9 x 4 tonne Rock Filter Units (RFU)

Associated with PA/4731

### **Description of project**

The Clipper gas field is located within Block 48/19 in the Southern North Sea (SNS) on the United Kingdom Continental Shelf (UKCS), Monoethylene glycol (MEG) is injected into the gas streams on the NUIs within the Cleaver Bank High area, and to the export pipeline from Clipper to Bacton on the Norfolk coast for flow assurance purposes to prevent hydrate formation. The freespan location is approximately 2 km from the UK shoreline and 110km from the UK/Netherlands median line and falls within the Cromer Chalk Bed Marine Conservation Zone (MCZ), Southern North Sea Special Area of Conservation (SAC) and Greater Wash Special Protection Area (SPA).





This screening direction is for pipeline freespan remediation works comprising the placement of upto 29 rock bags (20 x 2 tonne and 9 x 4 tonne). Work is expected to take 4 days and will take place between 1 August and 31 December 2023. Freespan correction and the prevention of pipeline buoyancy are essential to ensure pipeline integrity (and prevent pipeline failure) and protect the safety of other users of the sea. Fishing vessels are particularly vulnerable to snagging hazards such as these and remediation works will minimise the risk considerably by reducing the height and length of the identified spans.

No significant cumulative or in combination impacts are expected to occur between this project and other existing 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.

### **Location of 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.

The PL996 pipeline is in the southern North Sea and connects the Bacton Gas Terminal on the North Norfolk Coast to the Clipper in UKCS Block 48/19. At its closest point the PL996 pipeline is located approximately 84 km west of the UK / Netherlands median line. The predominant regional current The water depth in the vicinity of the deposit areas, vary between 9.5 m and 12m the seabed sediments are coarse sands with gravels with scattered cobbles and boulders. The faunal communities found in the area are those typically associated with sublittoral mixed sediment. Characterising species include Annelids, anthropods, Molluscs and echinoderms There was no evidence of Annex I habitats or OSPAR threatened and or declining species and habitats.

The project location is within the Southern North Sea SAC designated as an area of importance for harbour porpoise, the Greater Wash SPA which has been designated for its internationally important populations of overwintering birds and the Cromer Shoal Chalk Beds Marine Conservation Zone (MCZ), which has been designated for the protection of seabed features, such as chalk beds.

Harbour porpoise is the most common cetacean species in the area with highest densities observed during May and August. Spawning for lemon sole, sandeels, sprat and Norway lobster may coincide with the project works. The project area is not within a commonly fished ground and fishing effort is historically very low. Seabird sensitivity in the area varies from low to extremely high during the period of operations.

Oil and gas activity in the vicinity of the pipeline is high and this area of the SNS have extensive oil and gas infrastructure, although this is much more limited in the freespan location close to shore. The closest operational offshore wind farm,



Dudgeon is located approximately 15km to the northwest. There are no areas of aggregate extraction in proximity of the project location and no known wrecks. There are a number of pipelines in the vicinity of the PL996 pipeline. Due to the proximity of key ports around the Norfolk and Lincolnshire coasts, the density of shipping traffic is high in the southern North Sea but medium to high at the project location itself.

Given the location of the project, the areas identified at paragraphs 2(c)(i), (iii), (iv),(vi) or (vii) of Schedule 5 have not been given particular regard with respect to the project.

### **Type and characteristics of the potential impact**

In accordance with paragraph 3 of Schedule 5 to the Regulations, the likely significant effects of the project on the environment have been considered. Potential impacts on the environment from the activities associated with the project were assessed, with particular focus on the predominant impacts resulting from the deposits and seabed disturbance resulting from the deposit of those materials.

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

The physical presence of the single vessel involved will not have an exclusion area, however the vessel will be subject to navigational provisions and able to move away in an emergency. The project is in a very low-level fishing area and so the impact to other users of the sea is not expected to be significant. Noise and atmospheric emissions impacts are not considered to be significant

The pipeline remediation activities will involve the placement of upto 29 RFUs will result in direct impacts to an area of 112.6m<sup>2</sup> and indirect impacts to an area of upto 563m<sup>2</sup>.

Seabed impacts will arise from the installation of the deposits, where potential smothering may occur. The total area of disturbance (direct and indirect impact) is 0.00068km<sup>2</sup>, this will disturb the benthic epi-faunal species associated with the biotope complexes as well as faunal and non-mobile species. Noting the small area of disturbance and lack of sensitive habitats in the vicinity of the works, following completion of installation activities it is expected with flora and fauna will begin to recover quickly. The impact to the seabed environment at the location has therefore been assessed as not significant. The interaction with fish spawning and nursery locations is assessed as not significant given that the species release eggs to the water column. Juvenile fish will be able to avoid interaction with any deposits installed on the seabed. The impact to fish species is therefore not significant.

The pipeline remediation works take place in the Greater Wash SPA, noise arising from the works could affect prey species and cause potential displacement impacts however noting the short duration of the works (4 days) and the limited extent this is assessed as not significant therefore is not anticipated to impact the conservation objectives of the site.



The pipeline remediation works will take place in the Southern North Sea SAC, the proposed deposits will increase turbidity in the immediate vicinity, however the works will be limited in extent (less than 0.0018% of the SAC) and therefore is assessed as not significant and not anticipated to impact the conservation objectives of the site.

The pipeline remediation works will take place in the Cromer Shoal Chalk Beds MCZ, disturbance caused by the proposed works will result in increased turbidity in the immediate vicinity of the deposit activities however this will be short term and localised (0.0002% of the MCZ) and therefore has been assessed as not significant and not significantly likely to hinder the achievement of the conservation objectives for this site.

The proposed operation will utilise one vessel, and atmospheric emissions have been assessed from the diesel used for the vessel, and the time spent on location.

The total atmospheric emissions from the vessels undertaking the phase 3 project work, accounts for 0.0044% of the total UKCS CO<sub>2</sub> emissions. The emissions may result in a deterioration of the local air quality, but due to the relatively short duration of the work, and that the exposed conditions in the area will rapidly disperse the emissions, it is not anticipated that there will be a significant impact.

The main risk of accidental release of hydrocarbons is from a loss of diesel inventory from a vessel. The assessment showed that there is no potential for a significant effect from the loss of diesel from a vessel, therefore the impact was not assessed further.

There are no expected transboundary impacts as a result of the planned works, and while cumulative impacts have been identified given the other known existing and approved projects in the wider area these are not significant affecting 0.0013% of the SNS SAC, 0.00005% of the Greater Wash SPA and 0.0005% of the Cromer Shoals and Chalk Beds MCZ.

## **Decision**

Taking all the above determinations into account, the Secretary of State has concluded that the project is not likely to have a significant impact on the environment, and so an EIA 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 for the proposed activities.