Our Ref: 01.01.01.01-6026U
UKOP Doc Ref:1331613

Offshore Petroleum Regulator
for Environment & Decommissioning

SHELL U.K. LIMITED
SHELL CENTRE
LONDON
SE1 7NA

Registered No.: 00140141

Date: 13th March 2024

Department for Energy Security &
Net Zero

AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [redacted]
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www.gov.uk/desnz
OPRED@energysecurity.gov.uk

Dear Sir / Madam

THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2020
Victory Subsea Infrastructire - PIPELINE PL6377

A screening direction for the project detailed in your application, reference PL/2453/0 (Version 3), dated 27th February 2024 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 OPRED@energysecurity.gov.uk.

Yours faithfully

Signature Not Verified

Digitally signed by Department for Energy Security and Net Zero
Date: 2024.03.13 13:22:37 GMT
Reason: On behalf of the Secretary of State
Location: Offshore Petroleum Regulator for Environment and Decommissioning

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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

Victory Subsea Infrastructire - PIPELINE PL6377

PL/2453/0 (Version 3)

Whereas SHELL U.K. LIMITED has made an application dated 27th February 2024, 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/4699.

Effective Date: 13th March 2024

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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 30 March 2024 until 29 March 2026.

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

3 Nature of stabilisation or protection materials

Rock deposits

545, 123 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

44 [Number] concrete mattresses, each measuring 6 metres x 3 metres x 15 centimetres. 10 [Number] concrete mattresses, each measuring 6 metres x 3 metres x 30 centimetres. (The number of mattresses deposited should be the minimum required to provide the necessary protection, and any surplus mattresses must be returned to land).

Glass Reinforced Plastic (GRP) Kennels and Covers

2 GRP Kennels each measuring 100 mettres, x 6 metres x 2 metres. 2 GRP Covers each measuring 12 metres x 17 metres x 8 metres. (The number of GRP kennels and covers deposited should be the minimum required to provide the necessary protection, and any surplus 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: N/A

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]

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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 assessment 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 has 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 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 to the matters identified at paragraphs 1(a) to (g) of Schedule 5 to the Regulations, the characteristics of the project include the following:

Summary of the Project

Installation of:

-rigid production flowline (PL6377);

-north and south Pipeline End Manifolds (PLEMs);

-production jumpers (PL6374 & PL6378);

-umbilical (PLU6375) from the Victory well to the Edradour tie in structure;

-umbilical (PLU6379) from the Edradour tie in structure to the Edradour manifold;

-two control jumpers (PL6376 and PLU6373);

-umbilical (PL6425) from the existing Edradour manifold to the new Edradour tie in structure and from the Victory well to the north PLEM.

-associated stabilisation/protection materials 2 x Glass Reinforced Plastic (GRP) kennel, 2 x GRP covers, 545,123 tonnes of rock protection, and 54 concrete mattresses as detailed under PA/4699.

Description of the Project

The Victory Development will comprise a single well, a new 14-inch production pipeline, a new 4.7-inch control umbilical and associated subsea infrastructure. It will be tied into the existing Greater Laggan Area (GLA) pipeline system. The umbilical will run from the Victory well to the Edradour manifold, thus achieving subsea control. The produced fluids and gas will flow back to the Shetland Gas Plant (SGP). The gas and fluid (condensate) will be separated here with gas processed at SGP and fluids piped onwards to Sullom Voe terminal. The Victory development has been the subject of a recent Environmental Statement (ES/2022/003).

This screening direction is for the installation of a new production flowline (PL6377) and associated infrastructure (north and south Pipeline End Manifolds (PLEMs)), production jumpers (PL6374 & PL6378) which will run south from the Victory well and tie into the GLA infrastructure at Hot Tap Tee 1-2 (HTT1-2). The pipeline will be surface laid from a reel lay ship, prior to installation rock carpets will be laid at the PLEM locations, and once the pipeline is in place rock will be placed along its length for protection.

A new umbilical (PLU6375) will run west from the Victory well to the new Edradour tie in structure using a Construction Support Vessel (CSV). A new umbilical (PLU6379) will run from the Edradour tie in structure to the Edradour Manifold. Two control jumpers (PL6376 and PLU6373) and an umbilical (PL6425) will run from the existing Edradour manifold to the new Edradour tie in structure. An umbilical (PL6425) will be installed running from the Victory well to the north PLEM.

Associated protection materials for the project will be 2 x Glass Reinforced Plastic (GRP) kennel, 2 x GRP covers, 545,123 tonnes of rock protection, and 54 concrete mattresses.

The works are expected to take place in 2 phases from 30 March 2024 to 29 March 2026 inclusive.

No significant cumulative interactions are foreseen with any other existing or approved projects. There is not likely to be any significant impact of the project on population and human health. There is no credible potential for a major accident or disaster to affect this project. No significant impacts are anticipated.

Location of the Project

Having regard 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 Victory Field is a gas field located in the West of Shetland (WoS) region and spans Blocks 206/4, 206/5 and 207/1. It is 47 km from the Scottish coastline (Shetland) and 110 km from the UK/Faroe median line, water depths at the location range from 126m to 159m. It will be tied into the existing Greater Laggan Area (GLA) pipeline system where produced fluids and gas will flow back to shore for processing.

Water circulation in the project location is driven by the influx of North Atlantic waters through the Fair Isle Channel moving southwards along the Scottish coast. The seabed is characterised by sand ripples and mega-ripples. Seabed sediment along the pipeline and umbilical routes are predominantly offshore circalittoral coarse sediment, offshore circalittoral sand, and offshore circalittoral mixed sediment. The project location is not within any protected areas, with the closest UK area, the Faroe Shetland Spongebelt Nature Conservation Marine Protected Area (ncMPA), designated for deep sea sponge aggregations, ocean quahog (and supporting habitat) and offshore deep sea muds habitat being approximately 7 km distant. The Ramna Stacks and Gruney Special Protection Area (SPA) and North Roe and Tingon (SPA) are approximately 33km and 35 km respectively from the Victory location.

The epifauna observed in the survey area were dominated by dominated by annelids, cnidarians, porifera and nematodes. Area of potential Annex I stoney reef habitat have been identified in the vicinity of the pipeline location. Given the location of the proposed operations, there is the potential for the deep-sea sponge aggregations habitat. Deep sea sponge aggregations are listed on the OSPAR "Threatened and/or declining Species and Habitats" list. Ocean quahog have been previously recorded in the area, although none were found on recent surveys.

The project works and timing will take place at a time when a number of fish species may be found to use the area as spawning, juvenile or nursery locations. Sightings of cetaceans are most common between the months of May to August. Seals are not expected to be seen at the remote location. Seabirds sensitivity in Block 206/04 and adjacent blocks is low for most of the year, although medium in January, March and April, and high or very high in October. The project area is used for fishing, with a medium historical effort. Shipping intensity at the project location is low. Block 207/1 is a block of interest for the MOD, however the operator has engaged with MOD prior to submission of the application and no objections were received to the associated Consent to Location application for the pipeline. Blocks 206/4, 206/5 and 207/1 intersect with an Innovation and Targeted Oil and Gas (INTOG) area, INTOG-WoS-b. The closest active wind farm is over 250 km south. There are no wrecks in proximity to the proposed pipeline. There are sand gravel resources in Block 207/1. The "SHEFA 2" telecommunication cable runs approximately 8 km south of Block 206/4; this telecommunication cable does cross the proposed pipeline route.

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 to the environment from the activities associated with the project were assessed, with focus on the predominant impacts resulting from physical presence of the vessel, atmospheric emissions from vessel use, and sea bed disturbance from the placement of subsea infrastructure and deposit of protective materials.

The project vessel has the potential to cause interference to other users of the sea, namely fishermen and vessel traffic. Given the medium importance of the fishing area, the low vessel traffic, that the installation of infrastructure is a temporary activity and will have suitable mitigations in place to minimise interference with other users of the sea, the impact is deemed not significant.

The areas of seabed disturbance from the placement of the pipeline, umbilicals, PLEMs and protective materials are 90, 533.4 m2 for temporary impact (sediment disturbance) and 330, 334m2 for permanent impact (infrastructure and protective materials placement). The main receptor impacted by seabed disturbance will be the benthic communities. Physical disturbance can cause mortality or displacement of benthic species in the impacted zone. Resuspension of sediment may result in burial of Ocean Quahog or deep sea sponge aggregations by resettled sediments, however they are able to tolerate some level of burial. In the event that *Ocean Quahog* are present along the routes of the project, there is the potential for the loss of individuals of this species. However given the low numbers of individuals identified across surveys, the impacts to sessile benthic communities are expected to be at individual-level, rather than population-level. Therefore, the impact on benthic communities will not be significant.

Emissions to air will occur from combustion plant used on the vessels. The quantity of carbon dioxide equivalent from the vessels amounts to 0.048% of the 2018 total CO2e emissions from offshore oil and gas activity. The impact of the vessel emissions will be mitigated by optimising vessel efficiency and hence minimising fuel use and avoiding the unnecessary operation of power generation/combustion equipment. The environmental effects from emissions to air are not expected to have a significant impact on the environment.

The release of diesel fuel from the project vessel is considered a low risk due to the controls in place. If diesel is released to the marine environment, it is a non-persistent hydrocarbon and will rapidly disperse and evaporate. In the event of a diesel release the vessels would respond in accordance with their shipboard oil pollution emergency plan (SOPEP). There is no major environmental incident potential associated with the project.

There are no planned expected transboundary impacts because of the project.

The operations described in the application are in accordance with the Scottish 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: