

Our Ref: 01.01.01.01-6328U  
UKOP Doc Ref:1360568



Offshore Petroleum Regulator  
for Environment & Decommissioning

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

Registered No.: 00140141

Date: 4th September 2024

Department for Energy Security &  
Net Zero

AB1 Building  
Crimon Place  
Aberdeen  
AB10 1BJ

Tel [REDACTED]

Fax [REDACTED]

[www.gov.uk/desnz](http://www.gov.uk/desnz)  
[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 PL6510 - PAN NW TIE IN**

A screening direction for the project detailed in your application, reference PL/2492/0 (Version 2), dated 27th August 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](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 PL6510 - PAN NW TIE IN**

**PL/2492/0 (Version 2)**

Whereas SHELL U.K. LIMITED has made an application dated 27th August 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/5106.

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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 9 September 2024 until 31 August 2025.

#### **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**

Grout bags deposits

20 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).

Concrete mattress deposits

47 [Number] concrete mattresses, each measuring 6 metres x 3 metres x 15 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).

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

Within an area bounded by the coordinates:-

PL6509 - 61 37' 45.20" N, 01 29' 40.48" E to 61 37' 46.58" N 01 29' 45.71" E;

PL6510 - 61 37' 46.58" N 01 29' 45.71" E to 61 37' 45.20" N 01 29' 40.48" E;

PLU6508 - 61 37' 47.34" N 01 29' 44.17" E to 61 37' 46.58" N 01 29' 45.71" E.

And as detailed in the PL SAT and associated EAJ document.



## **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 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.

## **10 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).

## **11 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]





## 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.

### Characteristics of Project

This screening direction (PL/2492) relate to subsea installation works at the PAN NW well. 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

This screening direction is for the installation of subsea infrastructure associated with the proposed development as detailed under **PA/5106** - this comprises:

Installation of

- Rigid production tie-in spool (PL6510) at PAN NW well,
- Rigid gas lift tie-in spool (PL6509) at PAN NW well;
- Tree supply control jumper (PLU6508) from DC2 UCS to PAN NW well;



And associated stabilisation and protection materials as follows

- 20 te of Grout bags in 25kg bags (800 no.)
- Mattresses (47 no); and
- Temporary deposits.

### **Description of project**

The Penguins field is located in the Northern North Sea (NNS) approximately 160km from northern Shetland and adjacent to the UK/Norway Median line. An Environmental Statement (ES) (D/4184/2015) and subsequent ES Addendum were submitted in May 2016 and November 2017 respectively for the Penguin development. The ES covered the drilling of seven new production wells (Tranche 1) followed by an additional four new wells (Tranche 2 & 3) depending on the performance of the Tranche 1 wells. The PAN NW was considered in the ES addendum. The PAN-NW Infill project will be achieved by drilling a new well and installing the associated subsea infrastructure to route production to the new FPSO which is in field via the existing Drill Centre 2 (DC2) manifold. The existing DC2 cluster consists of the DC2 manifold, DC2 Umbilical Control System (UCS) and existing wells A1 and A2. The pipework is then routed back to the Riser Base Manifold and ultimately on to the FPSO via a 10"/16" pipe-in-pipe (PiP) production line, 4" gas lift line and Electro-Hydraulic Control (EHC) umbilical. Control will be provided by the existing in field control system with new local controls routed to the PAN-NW well. The workscope will involve the installation of the PL6509 gas lift jumper, the PL6510 production jumper and the PLU6508 control jumper. The infrastructure will be supported by the installation of groutbags and mattresses, in addition temporary deposit will also be made 3 rosv workbaskets and 2 deadman's anchors.

The project is not at risk from natural disasters given its location in UK offshore waters, or unplanned major accident scenarios leading to an environmental incident. No cumulative interactions are foreseen with any other existing or approved projects. There is no risk to human health from the workscope.

### **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 Penguins field redevelopment location lies within a seaward licenced area, which has been licenced for the exploration and extraction of hydrocarbons. The project is located approximately 160 km east from the Shetland coastline in Scotland and adjacent to the UK/Norwegian median line, in an area where water depth is approximately 168 m. The predominant current in the location is dominated by two



Atlantic flows, with circulation variable in the centre. The project location is not within any protected areas, with the closest being 95 km away.

Site-specific surveys identified the seabed as comprising of gravelly sand with varying proportions of shell accumulations, pebbles, cobbles, and boulders. The sediment type is described as circalittoral coarse sediment. The project location has been identified (from generic baseline information) as an area containing potential protected stony reef habitats, however such areas were not identified during site surveys. The benthic species identified, correlated with expected assumptions and were more prevalent near or on cobbled and stony areas.

The project works and timing will take place at a time when a number of fish species may be found to be spawning or using the area as juveniles or nursery locations. Sightings of cetaceans are most common during the months of July and August. Seals are not expected due to the remote location. Seabirds are most common in the area during the late summer months of August and September when expected density is 10-20 individuals per square km. The project area is primarily used for demersal fishing, but with a very low historical effort. Shipping intensity at the project location is also very low. The surrounding area comprises other oil and gas infrastructure within 10 km, but is not within a military activity zone, with no telecommunications cables, marine aggregate sites or renewable energy locations in proximity. An unknown wreck was identified approximately 8km northwest of the location.

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. Impacts on the environment from the activities associated with the project were assessed, with particular focus on the predominant impacts resulting from physical presence of the installed infrastructure and deposits and seabed disturbance resulting from the deposit of the infrastructure and 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 vessel involved with the work programme will not have an exclusion area attributed to them and would be able to move away from location in an emergency. The presence from the installation of infrastructure and permanent support and protection materials (within exclusion zones) does have the potential to interact with users of the sea - primarily fishermen. The installations of the various types of deposits are deemed necessary to prevent snagging with the pipeline infrastructure and will not pose a hazard to fishing gear. The project is in a low-level fishing area and so the impact on other users of the sea is not expected to be significant.



The total area of seabed permanently impacted by the introduction of infrastructure support and protective materials will be 891m<sup>2</sup> and a further 1118m<sup>2</sup> will be temporarily impacted. The main impacts expected are from smothering of organisms and change of habitat. However, the introduction of such support and protective materials will enhance biodiversity by variation and abundance of species that are found on hard substrate, which validates results from site-surveys of the area and abundance of species on rock and cobbled sites. Some natural sediment movement is expected in this area of sea, and so there will be an expectation of recovery of the site with more natural seabed material. Recovery of faunal communities is expected, but the time in which this will take place is less certain. The ecological impact from the project is not expected to be identifiable given the wider area of similar natural seabed environment available. 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 quantity of deposits to the seabed is inclusive of a contingency allowance, which may not be used, thus reducing the not significant impact further.

Emissions to air will occur from the engines on the vessels used in the pipeline operations. The proposed operations will result in emissions of carbon dioxide equivalent of 0.005% of the 2018 total emissions from UK offshore oil and gas activity. The emission from the vessels will not have a detrimental effect to local air quality over the long term, nor are they expected to impact the ability to reach wider climate change goals. The environmental effects from emissions to air are not considered significant. The impact of the vessel emissions will be mitigated by optimising vessel efficiency (i.e. minimising the number of vessels used and vessel trips required to achieve the project deliverables) and hence minimising fuel use and avoiding the unnecessary operation of power generation / combustion equipment.

There are no expected transboundary impacts as a result of the planned works, and no cumulative impacts have been identified given the other known existing and approved projects in the wider area. As above, an unknown wreck was identified approximately 8km northwest of the location, but interaction is not expected and therefore no significant impact potential exists.

In the event that an unlikely and unplanned accidental vessel diesel release scenario occurred, response measures would be implemented as the Shipboard Oil Pollution Emergency Plan (SOPEP). Diesel is a non-persistent hydrocarbon and the relatively small potential release volume indicates no significant impact.

There are no expected transboundary impacts as a result of the project. The works will not contradict the policies and objectives of the Scottish National Marine Plan.

## **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.