

Our Ref: 01.01.01.01-5997U
UKOP Doc Ref:1367621



Offshore Petroleum Regulator
for Environment & Decommissioning

NEO ENERGY PRODUCTION UK LIMITED
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LONDON
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Registered No.: 12086835

Date: 25th October 2024

Department for Energy Security &
Net Zero

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Crimon Place
Aberdeen
AB10 1BJ

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Fax

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
PIPELINE PLU6386 and PL6385**

I refer to your amended application dated 23rd October 2024, reference PL/2448/3 (Version 1).

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.

Yours faithfully

Signature valid

Digitally signed by Department for Energy Security
and Net Zero
Date: 2024.10.25 10:32:30 BST
Reason: On behalf of the Secretary of State
Location: Offshore Petroleum Regulator for
Environment and Decommissioning



**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 PLU6386 and PL6385

PL/2448/3 (Version 1)

Whereas NEO ENERGY PRODUCTION UK LIMITED has made an application dated 23rd October 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 Pipeline Works Authorisation PA/5254.

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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 7 March 2024 until 1 February 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

3 Nature of stabilisation or protection materials

Rock deposits

52106 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).

Grout bags deposits

73.5 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

131 concrete mattresses, each measuring 6 metres x 3 metres x 0.3 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 the areas stated in the application

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]

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 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 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 the particular, 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 changes to the Project

PL/2448/1:

This variation is to include 4 additional concrete mattresses in order to provide crossing support for pipeline PL6385 and PLU6386 at the Clyde to Valhall BU1 Fibre Optic cable crossing CR01 and CR02 location. These additional mattresses will be laid outside the Fulmar MCZ and will not impact this site. The additional four mattresses will be consented under NSTA Deposit Consent reference PA/5151.

PL/2448/2 :

This variation incorporated the following changes outlined by the NSTA pipeline works authorisation PA/5254:

- An increase in the amount of rock deposited at the Judy trench transition, this was to rectify an error in the initial application quantity. The increase does not result in an increase in the assessed seabed disturbance figure.
- A re-colocation of the Talbot pipeline crossing for the Affleck umbilical 50m north
- An increase of 160 grout bags for protection of the Affleck pipeline at the Talbot manifold
- 3 More concrete mattresses on the Affleck umbilical (PLU6386) at the Affleck manifold location

There has been a very small increase in seabed disturbance associated with these changes however this is not deemed to be significant and the remainder of the assessment and it's conclusions remain unchanged.

PL/2448/3:

This variation add 2 x concrete mattresses and 560 x 25kg grout bags. These works are associated with PA/5357.

There has been a very small increase in seabed disturbance associated with these changes however this is not deemed to be significant and the remainder of the assessment and it's conclusions remain unchanged.

Summary of the Project

Initial project under PL/2448/0:

As part of the Affleck field re-development 2 existing subsea production wells will be tied back to the Judy platform. This will involve the installation of new flowlines, umbilicals, tie-in structures and risers.

The following new pipelines will be installed:

- PL6385: 8" x 12" insulated production Pipe-in-Pipe (PIP) pipeline - 21 km long;
- PLU6386: A new Electro-Hydraulic Control (EHC) umbilical - 36 km long; and Tie-in spool pieces to connect the new pipeline to the Affleck and Talbot manifolds.

The following existing well production and EHC control jumpers will be reused and brought back into service:

- PL2409JA1 - a 6" production well jumper;
- PL2409JA2 - a 6" production well jumper;
- PLU2410JA1 - a control umbilical well jumper; and
- PLU2410JA2 - a control umbilical well jumper.



There will be associated deposits of loose rock, concrete mattresses and grout bags to provide stabilisation and protection. There will also be temporary deposits and seabed disturbances as part of the installation process.

The works will be consented under NSTA Pipeline Works Authorisation (PWA) PA/4730.

The application was varied to include four additional concrete mattresses in order to provide crossing support for pipeline PL6385 and PLU6386 at the Clyde to Valhall BU1 Fibre Optic cable crossing CR01 and CR02 location. This will be consented under NSTA Deposit Consent reference PA/5151.

Description of the project

The Affleck field consists of 2 horizontal producer wells (A1 and A2) drilled in 2007 and shut in since 2016 when production stopped due to the decommissioning of the Host Janice installation. The wells are being brought back on-line and will produce oil and gas to the Judy platform. The two wells are currently connected to the existing Affleck manifold by 2 6" jumpers. A new 21 km 8" x 12" 'pipe in pipe' production flowline (PLU6385) will transport hydrocarbons from the Affleck manifold north to the Talbot manifold where it will then be transported to the Judy platform via the existing Judy-Talbot pipeline. A new 36 km EHC umbilical (PLU6386) will be installed between Judy and Affleck, by passing the Talbot installation.

There will be 2 new tie-in and spool pieces installed and surface laid to connect the new production pipeline to both the Talbot and Affleck manifolds. These will be within the 500 m safety zones around both Talbot and Affleck. The 2 existing production well jumpers and 2 existing well control umbilical's connected to the Affleck manifold are being brought back into operation (including their tie in spools).

The new production pipeline (PLU6385) will be installed by dynamically positioned pipelay vessel, it will be initially surface laid and subsequently trenched and backfilled via plough. The EHC umbilical (PLU6386) will be installed by a construction vessel, it will be initially surface laid before being jet trenched. The tie-in spool pieces will be installed via dive support vessel, these will be surface laid and overlaid with concrete mattresses.

A number of permanent deposits will be required, these are listed below:

- Rock placement and concrete mattresses will be used at pipeline or cable crossings, of which there are 9 in total;
- Concrete mattresses and grout bags will be laid over the 2 new tie in spool pieces connecting PL6385 to Affleck and Talbot; and
- Grout bags will be laid over the 2 existing tie in spools connecting the A1 and A2 wells to the Affleck manifold.

The totals permanent deposits are listed below:

- PLU6385: 32,286 Tonnes of rock, 53 6x3m concrete mattresses, 280 25 kg grout bags;
- PLU6386: 19,787 tonnes of rock, 73 6x3m concrete mattresses, 340 25 kg grout bags;
- PL2409JA1(A1 well to Affleck Manifold tie in spool): 800 25 kg grout bags; and
- PL2409JA2 (A1 well to Affleck Manifold tie in spool): 800 25 kg grout bags.

The pipelines will be filled with treated seawater and pressure and leak tests will be undertaken on the pipeline and associated infrastructure. These operations will result in the discharge of a small number of chemicals to the marine environment.

The activities will also require the temporary placement of equipment on the seabed to aid installation, these include clump weights, diver baskets and concrete mattresses. The deposits will be removed upon completion of the works and will be predominantly in the 500 m zones.

There is no risk to human health from the works to install the pipelines or depositing the protective materials on the seabed.

There is not a significant risk of major accidents or natural disasters which could lead to major environmental damage.

Any wastes associated with the project will be handled appropriately and no significant impacts are anticipated.

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:

The Affleck field redevelopment will reuse two wells previously drilled in 2007. The proposed development is in the Central North Sea, approximately 283 km from the east coast of Scotland and 5 km from the UK/Norway median line in water depths ranging from 70 m to 75.4 m.

Benthos: The seabed in the vicinity of the wells and pipeline are relatively flat and featureless with little visible fauna, it is largely characterised by deep circalittoral sand', (EUNIS A5.27), with a small area to the southwest of the pipeline classified as 'deep circalittoral coarse sediment' (EUNIS A5.15). The seabed sediments and communities observed have a high level of homogeneity and uniformity, with the sediments consisting largely of loose silty sand with occasional shell fragments.



Annelida dominated the faunal community, accounting for 80% of individuals and 40% of taxa. Mollusca were the second most dominant taxa followed by Arthropoda and Echinodermata. The most dominant species were the polychaete worms *P. jeffreysii*, *P. assimilis*, and *Galathowenia*.

Part of the pipeline route is located within the Fulmar Marine Conservation Zone (MCZ). The Fulmar MCZ has been designated for subtidal sand, mud, and mixed sediments as well as the bivalve mollusc ocean quahog. Six ocean quahogs (*A. islandica*) were observed across five stations during the Affleck pipeline survey, including one station in the MCZ. In addition, a single pair of siphons was observed at one sampling location and dead and broken shells of this species were found throughout the survey area.

Horse mussel (*Modiolus modiolus*) were observed north of Talbot within the pipeline route, however *Modiolis* was not observed to form in densities that could be classed as biogenic reef. Seapens were observed at locations along the pipeline route however the habitats were not deemed to form the OSPAR (2008) declining and/or threatened habitat, 'seapen and burrowing megafauna communities' due to the absence of frequent burrows in the sediment.

European Protected Species and pinnipeds: Cetaceans such as harbour porpoise minke whale, white beaked dolphin and Atlantic white-sided dolphin are likely to occur in the project area predominantly during the months from May to September. Pinnipeds, such as the grey seal and the harbour seal, may occur in the project area in very low densities but are far more common close to shore.

Seabirds: Multiple species of seabird could be present at the project area in various levels of abundance during the post breeding season. The highest abundance of species is attributed to auks, black-legged kittiwake, northern gannet, and northern fulmar. Sensitivity of seabirds in the project area is generally low throughout the year with exceptions in May and June when sensitivity is very high in blocks 30/13 and 30/14, and extremely high in adjoining block 30/08.

Fish and shellfish: The project area lies within multiple nursery and spawning areas of fish species. Priority Marine Features (PMF) such as anglerfish, blue whiting, cod, herring, ling, mackerel, Norway pout, sandeels, spurdog and whiting are known to be found in the project area. One station within the survey, in an area through which the umbilical between Affleck and Judy will pass, had sediment suitable for sandeel spawning.

Other users of the sea: Commercial fishing effort in the project area has been assessed as "low to moderate" representing less than 0.01% of total UK landed value and weight. Shipping density in the area is 'very low'. The project area sits within a well-established location for offshore oil and gas infrastructure. The closest installation is the Jasmine installation, situated approximately 9 km to the SSW of the proposed Affleck pipeline route. The project area is not used for military exercises. There are no known wrecks located close to the pipeline or umbilical, the closest being 19km away.

Given the location of the project, it is not likely that the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) 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, seabed disturbance, physical presence, planned discharges 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.

Seabed disturbance will be caused by several aspects of the pipeline installation, which are outlined below:

- The placement of loose rock, concrete mattresses and grout bags onto the seabed, causing the smothering and burial of the existing seabed substrate
- The excavation of the seabed trench for the pipeline, followed by reburial of the excavated material
- The surface laying of the pipeline pieces, such as spool pieces
- The laying on the seabed of varying pieces of installation equipment and aids e.g. baskets, mattresses, weights
- The settlement of suspended sediment plumes created by excavation and seabed placement

The total area of seabed disturbance from the placement of rock and other deposits in addition to the area disturbed by trenching activity will be 184,159.5 m², A further 158,400 m² will be disturbed by indirect impacts such as resettlement from suspended sediment. In total the area disturbed across the pipeline project will be 0.342km²

In areas subject to excavation through the trenching process some mortality and damage to the benthic fauna in the immediate vicinity of the trench will be likely. However, the sediment will be returned to the trench allowing full recovery of the faunal assemblage will take place over time and the impacts will not be long lasting. Similarly in areas where disturbance from temporary deposits occurs the impacts on benthic fauna are likely to be minor and full recovery of the benthic assemblage is expected.

In areas subject to smothering and burial by the permanent deposition of rock, grout



bags and concrete mattresses, there will be a localised but lasting change in the habitat type, from soft sediment to hard substrate. There will likely be a change in benthic species composition in areas of introduced hard substrate and this change in species assemblage will last until any subsequent decommissioning of the infrastructure.

The impacts from seabed disturbance and deposits will not be significant, as the habitats affected are widespread and well represented in the wider region. There are no habitats of high conservation interest which are likely to be adversely affected.

The pipelines will cross the Fulmar MCZ, the MCZ has an area of 2,437 km² and approximately 0.07 km² of seabed disturbance will occur within the boundary of the MCZ (4 km of the production pipeline and 7 km of the EHC control umbilical) and 0.041km² of this area will be directly affected by the placement of rock or concrete mattresses. Therefore, 0.002% of the MCZ will be impacted by the proposed operations. Due to the small proportion of the site directly impacted by permanent deposits and the high levels of habitat recovery expected for those areas affected by trenching and in-direct impacts, it has been concluded that the operations will not hinder the conservation objectives of the MCZ.

Within the Fulmar MCZ there is extensive existing offshore oil and gas infrastructure, much of which has been in place for many years and some which has been installed more recently. The total area of the MCZ cumulatively affected by rock placement when operations at Affleck are combined with past operations remains very small, at approximately 0.352km². The cumulative effects are not likely to hinder the conservation objectives of the MCZ.

Fish, marine mammals and benthic species are not considered to be significantly impacted. Underwater noise from pipelay operations is considered to have a negligible impact on marine mammals and fish species as the majority of noise is of low frequency and is not impulsive.

There are no expected transboundary effects from the operations. The nearest

Boundary (Norwegian median line) is located approximately 5 km from the development area.

Discharge of offshore chemicals associated with the pipeline installation, testing and tie-in operations have been assessed as not likely to have a significant effect on the environment and operations will be undertaken in accordance with a chemical permit granted under the offshore chemical regulations.

The main risk of accidental release of hydrocarbons is the loss of diesel inventory from a vessel. The assessment showed that the probability of a diesel spill

from a vessel involved in the project is very low, with numerous mitigation measures and procedures in place. Therefore, the risk of an oil spill event that could have a significant impact on the environment is minimal.

The proposed operation is planned to utilise 8 vessels, and atmospheric emissions have been assessed from the diesel used for each vessel and the time spent on location. The total atmospheric emissions from the vessels undertaking the project work will be 10,101 tonnes of carbon dioxide equivalent (CO₂e) which accounts for 0.05% of the total offshore oil and gas UKCS CO₂ emissions (using 2022 as a baseline). 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.

There will not be a significant impact to other users of the sea from the installation activities given the low levels of shipping in the area. As the proposal is to trench and bury the pipelines and trawler-friendly subsea protection will be used, the impacts to the fishing industry in the area are not significant.

There are no other operations recorded within the vicinity of the operations that may lead to cumulative effects on the seabed, marine environment or air quality.

The operations are in accordance with the English Offshore East Marine Plan.

2) 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 environmental impact assessment is not required.

3) 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