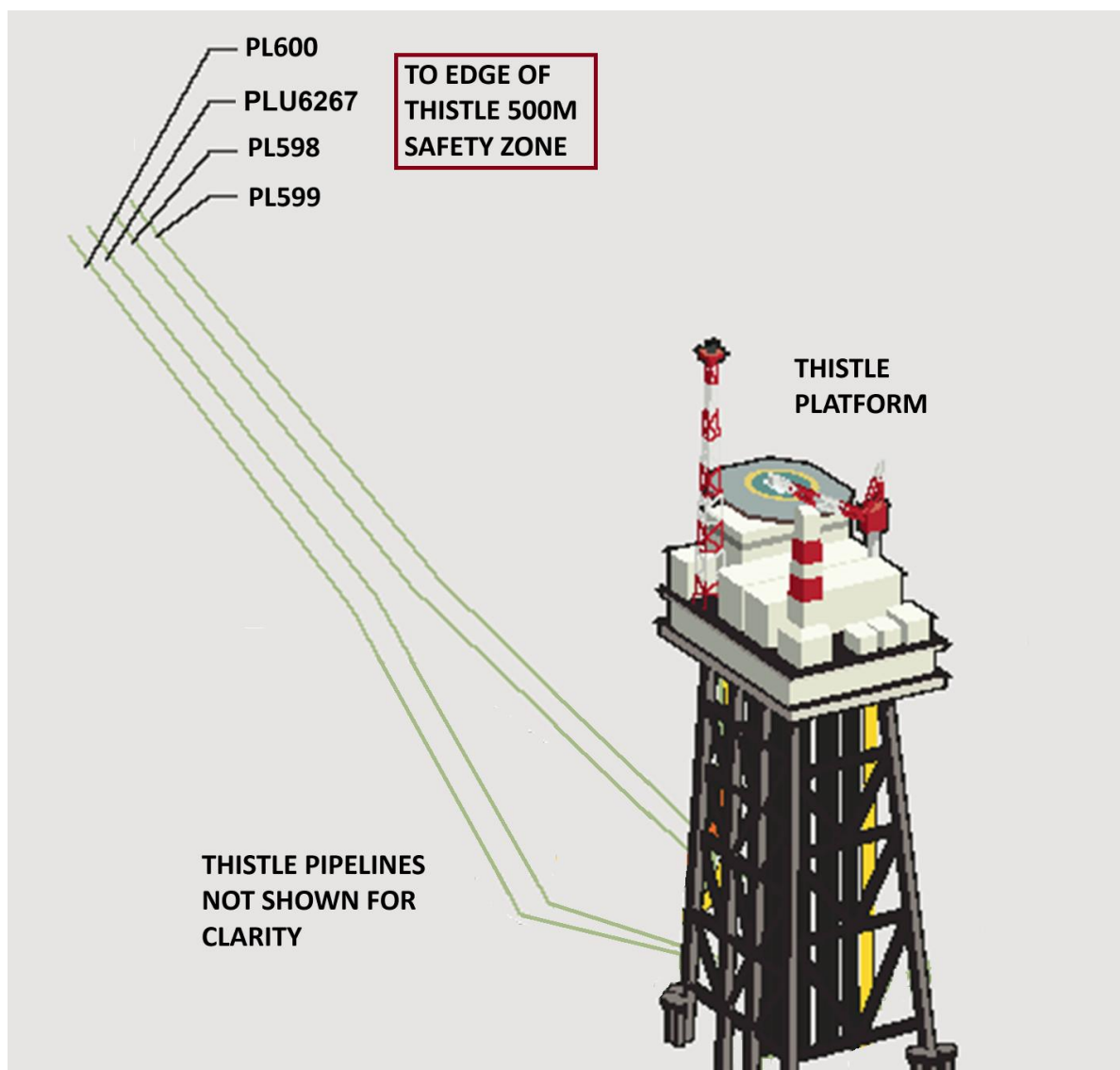




Don Decommissioning Programme for pipelines in Thistle 500m zone



DON DECOMMISSIONING PROGRAMME FOR PIPELINES IN THISTLE 500M ZONE

BP Document Number: DECOM-DON-HS-PRO-BP-0305

FINAL VERSION

April 2025



DOCUMENT CONTROL

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REVISION RECORD

Revision No.	Reference	Changes/comments	Issue date
A1	First issue	Issued for review and comment	17 July 2023
A2		Issued to OPRED for review	27 Nov 2023
A3		Updated and returned to OPRED	26 April 2024
A4		Updated and returned to OPRED	29 July 2024
A5		Updated and returned to OPRED	09 Oct 2024
A6		Issued for Public & Statutory Consultation	12 Nov 2024
C1		FINAL version	17 April 2025

DISTRIBUTION LIST

Company	No. of copies
Offshore Petroleum Regulator for Environment and Decommissioning	1 electronic
GMG, NFFO, NIFPO, SFF, NSTA	1 electronic each
Britoil Limited	1 electronic
Chrysaor Production (U.K.) Limited	1 electronic



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TABLE OF ABBREVIATIONS

ABBREVIATION	EXPLANATION
~	Approximately
BP	bp. Capital letters used to differentiate the term from the surrounding text.
Britoil	Britoil Limited. Formerly Britoil Public Limited Company. A subsidiary of BP.
CA	Comparative Assessment
Chrysaor	Chrysaor Production (U.K.) Limited (refer Table 1.6.1)
CI	Chemical Injection
CNRI	CNR International (UK) Limited (refer Table 1.6.1)
DFGI	Dunlin Fuel Gas Import
DP	Decommissioning Programme(s)
EA	Environmental Appraisal
EnQuest	EnQuest Heather Limited
ENVID	Environmental Identification
EPDM	Ethylene Propylene Diene Monomer
ESDV	Emergency Shutdown Valve
FPU	Floating Production Unit (refer Table 1.6.1)
GBS	Gravity base Structure (concrete) (refer Table 1.6.1)
GMG	Global Marine Group
Jacket	substructure that supports topsides
Jacket footings	Part of jacket or substructure resting on the seabed up to the highest point of the piles, or a part of the steel installation that is so closely connected as to present major engineering problems in being severed.
KP	Kilometre Point, usually measured from point of origin, the start of the pipeline at the pipeline flange. A negative KP means that the features (e.g. tie-in spools) lie between the riser flange and the start of the pipeline.
LAT	Lowest Astronomical Tide
MCX	MCX Dunlin (UK) Limited (refer Table 1.6.1)
No	Number (of)
NSTA	North Sea Transition Authority
OPRED	Offshore Petroleum Regulator for Environment and Decommissioning
OSPAR	Oslo Paris Convention. (The Convention for the Protection of the Marine Environment of the North-East Atlantic (the 'OSPAR Convention')).
PL, PLU	Pipeline or umbilical Identification Number as defined by NSTA using the PWA application process or Pipeline (refer Table 2.1.1).
PL600	PL600 though PL600.6 as described on the relevant PWA
PWA	Pipeline Works Authorisation
SALM base	Single Anchor Leg Mooring base
SDC	Subsea Decommissioning Collaboration (Figure 6.3.1)
SPM	Single Point Mooring (Base). Also referred to in the documentation as SALM
TAQA	TAQA Europa B.V. (refer Table 1.6.1)
UKCS	United Kingdom Continental Shelf
UTM	Universal Transverse Mercator
WNAS	Wintershall Norsk AS (refer Table 1.6.1)



1. EXECUTIVE SUMMARY

1.1 Decommissioning Programme

This document presents the Decommissioning Programme (DP) for the sections of the Don pipelines inside the Thistle 500m zone. As the pipelines are within the Thistle 500m zone, the DP is supported by a Comparative Assessment ('CA') and Environmental Appraisal ('EA'). The assessments for the Don pipelines are combined with those conducted for the Thistle pipelines [4], [7].

The Don pipelines include:

- PL598, trenched and buried except for surface laid sections near Thistle, ~0.567 km long (17.44 km)
 - PL599, trenched and buried except for surface laid sections near Thistle, 0.570 km long (17.34 km)
 - PL600 (PL600, PL600.1 through PL600.6 (referred to throughout this document as PL600), trenched and buried except for surface laid section near Thistle, ~0.56 km long (17.73 km)
 - PLU6267 trenched and buried, except for surface laid section near Thistle, ~0.50 km long (17.73 km)
- and,
- the pipe bridge supporting these pipelines as they approach the riser sections.

Riser caisson 930 along with the risers for PL598, PL599, PL600 and PLU6267 contained within are all out of scope and addressed in the Thistle upper jacket Decommissioning Programme [5].

The rest of the Don installations and pipeline infrastructure were subject to separate Decommissioning Programmes [1]. Although decommissioning of the Don pipelines is being treated in this document as a separate project, the intention is that the Don pipelines inside the Thistle 500m zone will be decommissioned at the same time as the Thistle pipelines to reduce environmental impacts and cost.

1.2 Requirement for Decommissioning Programme

Pipelines: In accordance with the Petroleum Act 1998, Britoil Limited as former operator responsible for decommissioning the Don field, and on behalf of the Section 29 notice holders (Table 1.4.2), is applying to the Offshore Petroleum Regulator for Environment and Decommissioning ('OPRED') to obtain approval for decommissioning the Don pipelines as detailed in Section 2 of this document. Partner letters of support are included in Appendix C.

In conjunction with public, stakeholder and regulatory consultation, this Decommissioning Programme is submitted in compliance with national and international regulations and OPRED guidance notes [9]. The schedule outlined in this document is for a twelve-year period¹ to decommission the pipelines beginning in 2026.

1.3 Introduction

The Don North-East (NE) and Don South-West (SW) Fields are comprised of four operating licences, Don North-East (P104, P236 and P296) and Don South-West (P236). The Fields were operated by BP and are located approximately 230 km north-east of the Shetland Islands in Block 211/18a in the United Kingdom sector of the northern North Sea, in a water depth of 160 m. The Fields were discovered in 1976. Oil was first produced in October 1989, and exported via the Thistle installation to the Sullom Voe oil terminal on Shetland. The original combined Don Fields (Don NE and SW) Fields are illustrated in Figure 1.3.1.

¹ Activity window extended as per North Sea Transition Authority ('NSTA') strategy which aspires to combine multiple scopes in a single campaign.

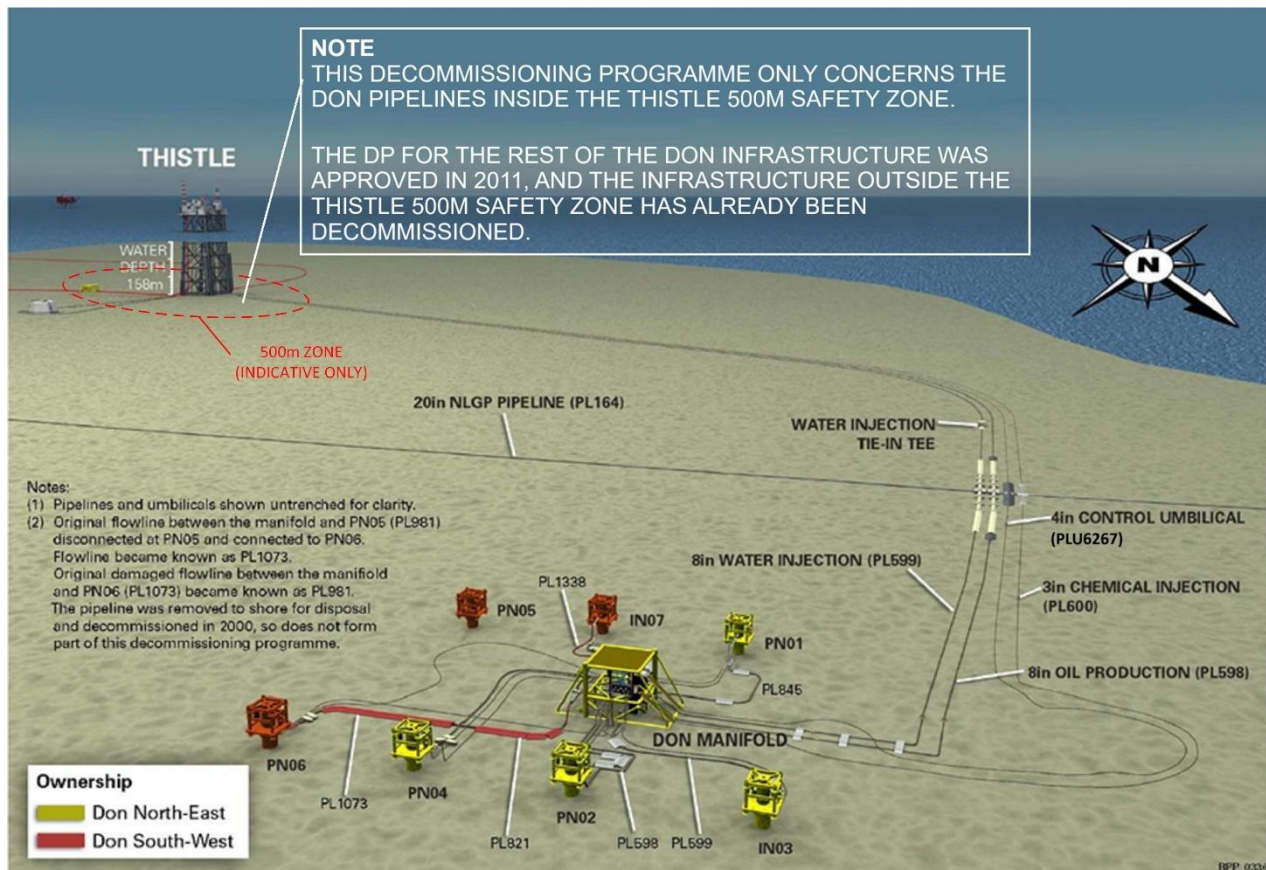


Figure 1.3.1: Don North-East and Don South-West Fields tied back to Thistle

The Thistle installation is in block 211/18a of the UKCS and operated by EnQuest Heather Limited. The Thistle field is located ~201 km North-East of Shetland, in a water depth of ~162 m.

The Decommissioning Programme explains the principles of the decommissioning activities and are supported by a comparative assessment for the pipelines [4] and an environmental appraisal [7] combined with the documents produced in support of the Thistle pipeline DP [6].

1.4 Overview of Pipelines being Decommissioned

1.4.1 Pipelines

Table 1.4.1: Don pipelines being decommissioned		
Number of Pipelines, Cables, Umbilicals	4	Refer Table 2.1.1

1.4.2 Section 29 notice holders

Table 1.4.2: Pipeline Section 29 notice holder details			
Section 29 Notice Holder	Registration Number	Equity Interest	
		Don North-East	Don South-West
Britoil Limited	SC077750	80.30%	58.30%
Chrysaor (UK) Theta Limited	01491002	19.70%	41.70%



1.5 Summary of proposed Decommissioning Programme

Table 1.5.1: Summary of Decommissioning Programme	
Proposed Decommissioning Solution	Reason for Selection
1. Pipelines	
<p>Both pipelines PL598 and PL599 have been flushed and cleaned.</p> <p>PL600 is impaired by internal core blockages, hence flushing was not possible before the execution of prior decommissioning activities. PL600 and PLU6267 have been cut at multiple locations along their entire >17km length (i.e. from Thistle topsides to Don manifolds), and contents allowed to disperse to sea under an approved chemical permit and risk assessment. Please refer to the original Don DP [1] and Table 2.2.1 herein for more information. A new permit application will be submitted to flush these umbilicals again before they are severed inside the Thistle 500m zone. Please refer to the original Don DP [1] and Table 2.1.1 herein for more information.</p> <p>Leave <i>in situ</i>. As per the CA [4] all pipelines will be left <i>in situ</i> except for the short-surface laid sections near the Thistle platform. The surface laid sections of the pipelines will be removed down to trench depth. Deposit a small quantity of rock to bury cut pipeline ends inside the trench.</p> <p>The deposition of rock on cut pipeline ends will be kept to a practical minimum. For the purposes of the EA it is assumed that up to 15 Te of rock will be required at each location, giving an estimated total of 60 Te.</p> <p>Environmental permit applications required for work associated with decommissioning of the pipelines will be applied for.</p>	<p>These are the preferred options following comparative assessment [1], [4].</p>
2. Pipeline structures	
<p>The pipebridge will be fully removed.</p> <p>Environmental permit applications required for work associated with decommissioning of the pipe bridge will be applied for.</p>	<p>As per mandatory requirements.</p>
3. Interdependencies	
<p>In order of preference, materials that have been removed will be returned to shore for reuse, recycling, or disposal as appropriate.</p> <p>Riser caisson 930 along with the risers for PL598, PL599, PL600 and PLU6267 contained within are all out of scope and addressed in the Thistle upper jacket Decommissioning Programme [5].</p> <p>The Don fields have already been partly decommissioned. The Don pipeline infrastructure inside the Thistle 500 m zone will be decommissioned at the same time as the Thistle pipeline infrastructure.</p> <p>Some of the Thistle pipelines cross over the Don pipelines inside the Thistle 500 m zone. However, the decommissioning proposals described in this document are not affected.</p> <p>No third-party infrastructure will be directly affected by the decommissioning proposals.</p>	



1.6 Field Location including field layout and adjacent facilities

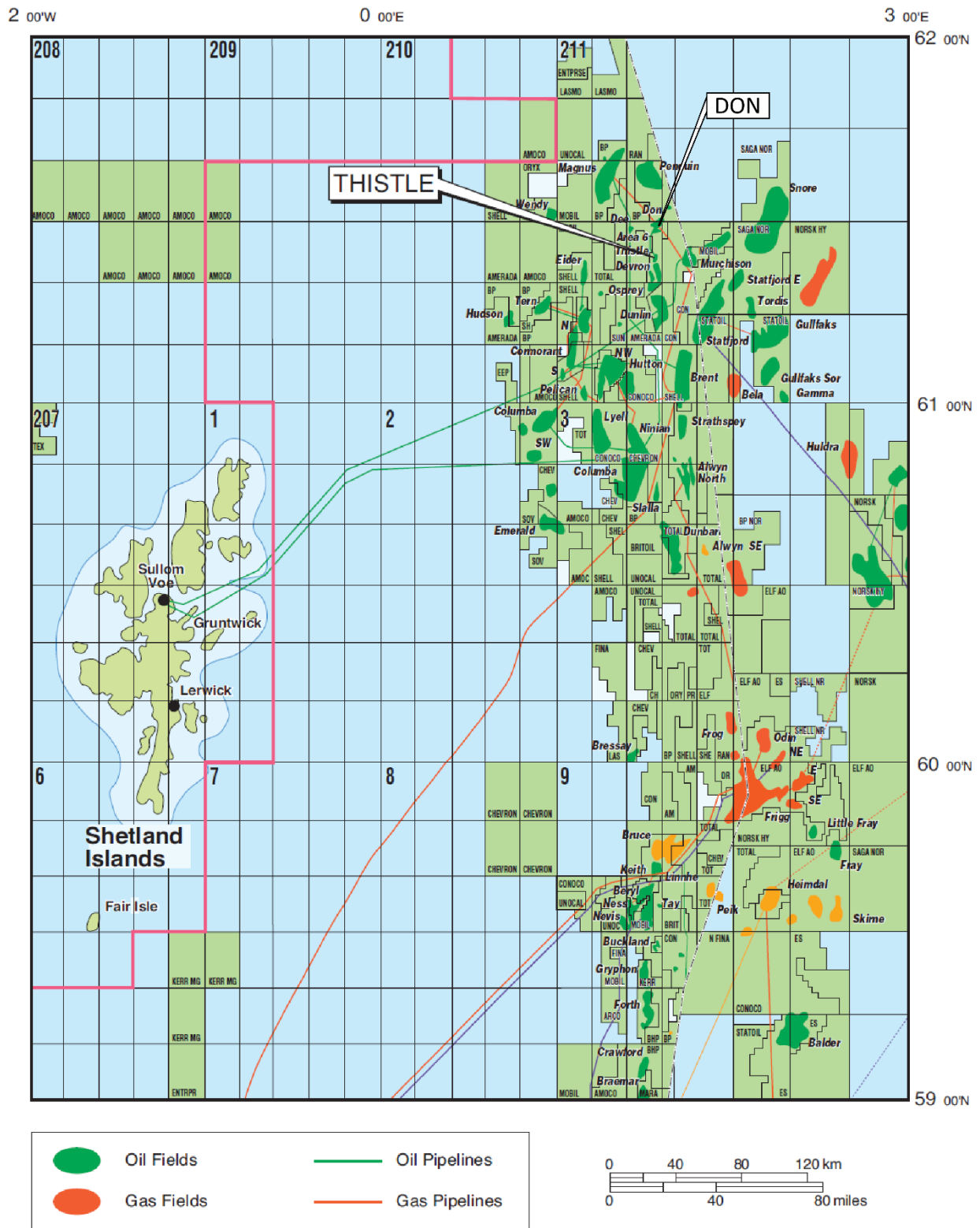


Figure 1.6.1: Thistle & Don field location in UKCS²

² Includes Don infrastructure inside the Thistle 500m zone.

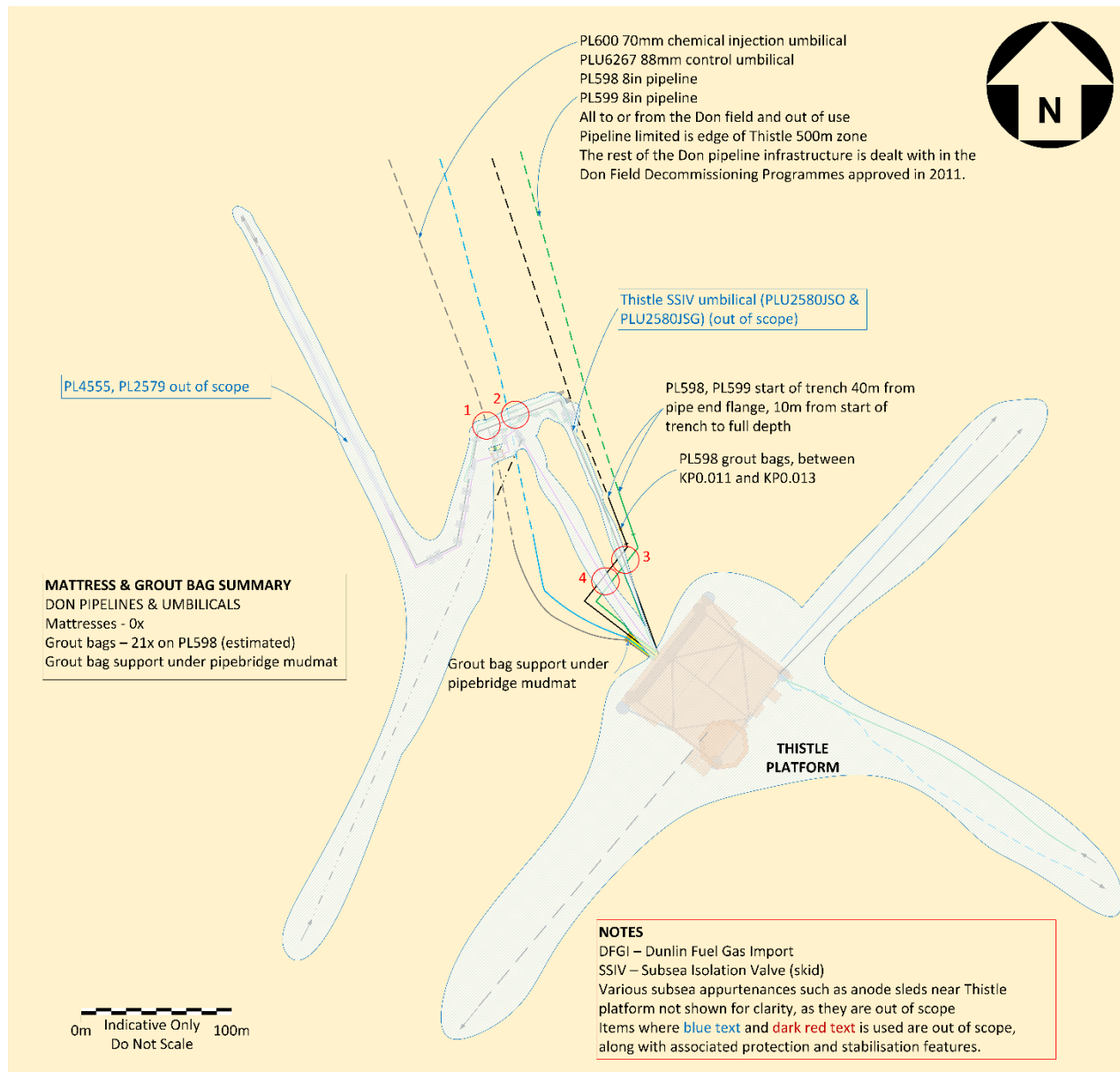


Figure 1.6.2: Don pipelines at Thistle



Table 1.6.1: Adjacent facilities (relative to Don pipelines in Thistle 500m zone)

Operator	Name	Type	Direction & distance	Information	Status
CNRI & WNAS	Murchison	Jacket footings	NE, 9.5km		Decommissioned
MCX	Dunlin A	GBS	S, 9.7km		Out of Use
TAQA	Eider A	Steel jacket	W, 22.5km		Out of use
EnQuest	Thistle	SALM base	NE, 2.4km		Out of use
EnQuest	Magnus	Fixed steel platform	~32.2km NNW	Connected to Wye structure via PL4556	Operational
EnQuest	PL2579	3in PL	Piggybacked with PL4555	Refer [3]	Out of use
Fairfield Betula Limited, MCX	PL2852	4in PL	Thistle to Dunlin Platform		Decommissioned
Impacts of decommissioning proposals					
There are no direct impacts on adjacent facilities from the work associated with the Don pipeline decommissioning activities.					

1.7 Industrial Implications

For and on behalf of the Don Section 29 notice holders, as operator of the Don pipeline infrastructure it is Britoil's intention to develop a contract strategy and Supply Chain Action Plan that will result in an efficient and cost-effective execution of the decommissioning works. This will be achieved by liaising directly with EnQuest, the operator of the Thistle facilities and pipeline infrastructure.

The Don pipeline Decommissioning Programme for pipelines inside the Thistle 500 m zone will be managed by EnQuest on behalf of the Section 29 notice holders to ensure safe, efficient, and legally compliant delivery of the various elements of the decommissioning scope. The intention is to make efficient use of the supply chain to generate value through the application of knowledge, innovation, and technology, explore collaboration opportunities and to employ best practice in the management of the supply chain to deliver a cost effective and reliable service. Where appropriate existing framework agreements may be used for decommissioning activities.



2. DESCRIPTION OF ITEMS TO BE DECOMMISSIONED

2.1 Pipelines including stabilisation features

Table 2.1.1: Pipeline information									
Description	Pipeline Number (as per PWA) ⁵	Diameter (NB) (inches) ¹	Length (km) ¹	Description of component parts	Product conveyed ³	From – to end points ⁴	Burial Status	Pipeline Status	Current Content
Oil production pipeline	PL598	8	0.57 (16.83)	Carbon steel pipeline coated with 13mm thick EPDM. Tie-in pipespools (85 m long excluding 25 m length on pipe bridge) are provided with 50mm CWC (81 m).	Oil, condensate	From edge of Thistle 500m zone to but not including Thistle Riser-R930 Caisson Exit. (From 'Cut A' to but not including Thistle Riser-R930 Caisson Exit at the Thistle platform).	Trenched and buried, surface laid at ends	Out of use	Inhibited seawater
Water injection pipeline	PL599	8	0.57 (17.24)	Carbon steel pipeline coated with 13mm thick EPDM. Tie-in pipespools (85 m long) excluding 25 m length on pipe bridge are provided with 50mm CWC (81 m).	Seawater	From but not including Thistle Riser-R930 Caisson Exit on the Thistle platform to edge of Thistle 500 m zone. (From but not including Thistle Riser-R930 Caisson Exit on the Thistle platform to 'Cut K').	Trenched and buried, surface laid at ends	Out of use	Inhibited seawater
Chemical injection umbilical	PL600 PL600.1 PL600.2	70mm	0.56 (16.4)	Steel armoured chemical injection umbilical, 2x6.3mm,	Corrosion inhibitor chemicals	From but not including Thistle Riser-R930 Exit to	Trenched and buried, surface laid	Out of use	Surflo SI6772, Surflo 6442,



Table 2.1.1: Pipeline information

Description	Pipeline Number (as per PWA) ⁵	Diameter (NB) (inches) ¹	Length (km) ¹	Description of component parts	Product conveyed ³	From – to end points ⁴	Burial Status	Pipeline Status	Current Content
	PL600.3 PL600.4 PL600.5 PL600.6			2x9.5mm bore		edge of Thistle 500 m safety zone. (From Umbilical junction box on Thistle to 'Cut AM')	at ends		Surflo H356, Methanol
Control & monitoring umbilical	PLU6267	88mm	0.54 (16.66)	Steel armoured electrohydraulic and hydraulic fluids umbilical	Electrical power, signals, and hydraulic fluid	From but not including Thistle Riser-R930 Caisson Exit to edge of Thistle 500 m safety zone. From Umbilical junction box on Thistle to 'Cut K')	Trenched and buried, surface laid at ends	Out of use	Oceanic HW540, a water based hydraulic fluid

NOTES

1. If diameter is expressed in mm it refers to outside diameter of umbilical or flexible flowline
2. All pipeline lengths are estimated to the edge of the Thistle 500 m zone, with the full length of the pipelines given in brackets. The Don DPs quotes the original full length of the pipelines (i.e. ignoring sections have been removed) and does not explicitly define the length of pipeline inside the Thistle 500 m zone.
3. Quantities of chemicals remaining in the full length of Don pipelines before the sections outside the Thistle 500m zone were decommissioned are as follows: PLU6267, Oceanic HW540, 6.9te, PL600, Surflo SI677, 1.8Te, PL600, Surflo 6422, 1.3Te, PL600, Surflo H356, 1.1Te, PL600, Methanol, 1.3Te. These quantities represent the maximum inventories in umbilicals PL600 and PLU6267, including the elements within Thistle 500m zone and jacket. Refer Don Field Decommissioning Programme, DON-BP-001, May 2011 Table 9.2, page 9-7 [1]. The fluid quantities for the sections within the 500m zone addressed in this DP are approximately 3.2% of the quantities noted here.
4. The 30in Riser – R930 Caisson at the Thistle platform is out of scope and will be dealt with in the Thistle upper jacket DP [5].
5. Reference Pipeline Works Authorisation (PWA) 16/W/88 and 17/V/25.



Table 2.1.2: Pipeline protection & stabilisation features

Stabilisation Feature	Total Number	Total Mass (Te)	Location	Exposed/Buried/Condition
THISTLE APPROACHES (INSIDE 500 M ZONE)				
Grout bags (25 kg)	21	0.53	Between KP0.011 and KP0.013	Exposed. Burial status to be confirmed during decommissioning operations.

2.2 Pipeline structures

Table 2.2.1: Pipeline structure information

Pipeline structure incl. stabilisation features	No	Mass (Te)	Location		Comments / status
		Size (m)	WGS84 Decimal	WGS84 Decimal Minute	
Pipebridge	1	10	61.362533° N	61°21.7520' N	Pinned to base of riser caisson 930 with the other end resting on a grout bag support on the seabed. Refer Figure 2.2.1.
		22.35x4x1.5	1.578017° E	1°34.6810' E	
Grout bag support under mudmat	1	1	As above	As Above	Exposed. Burial status to be confirmed during decommissioning operations. Size not specified. Estimated. Figure 2.2.1.
		4.5 x 4.5 x 0.3			

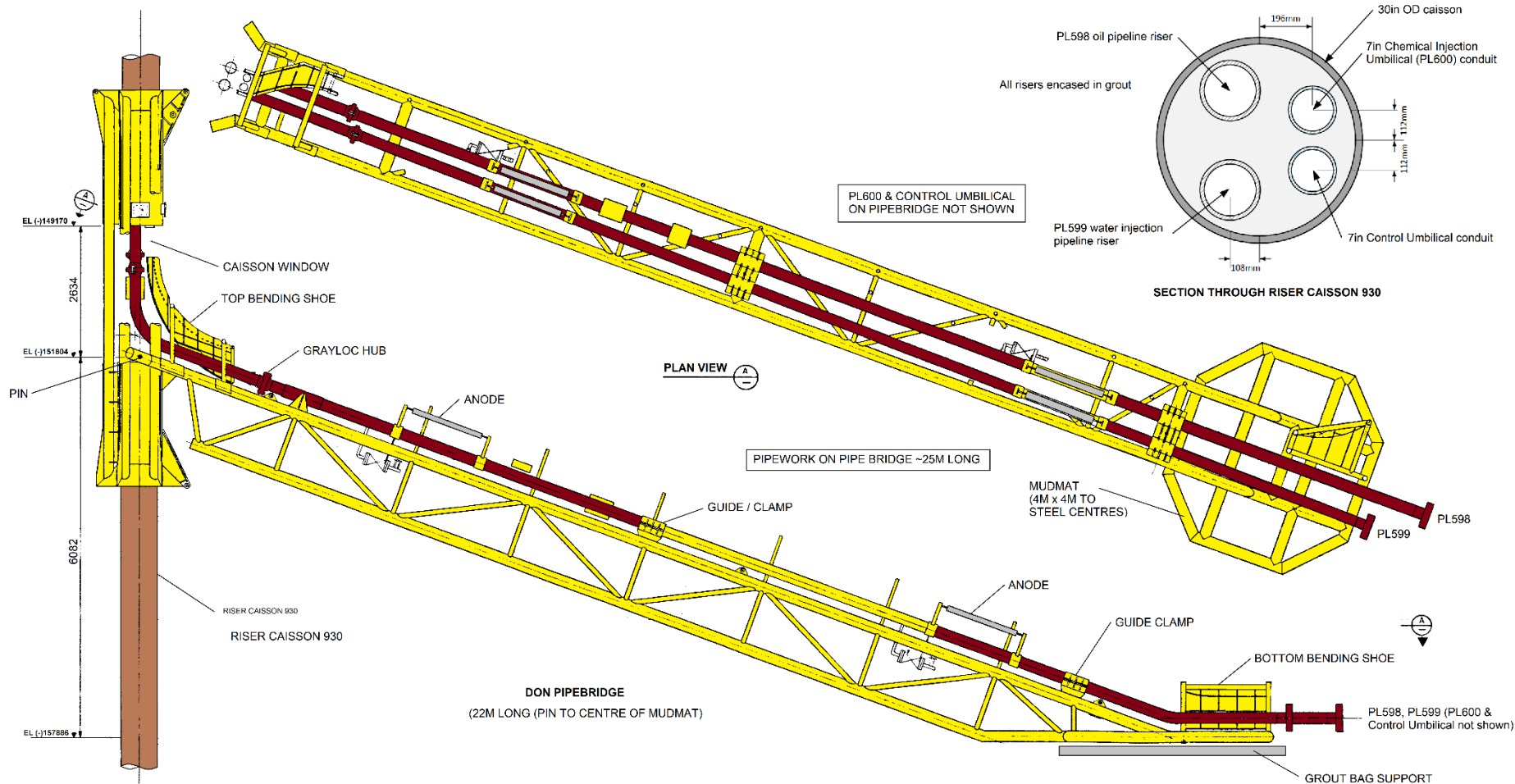


Figure 2.2.1: Don pipebridge (next to riser caisson 930 on Thistle jacket)

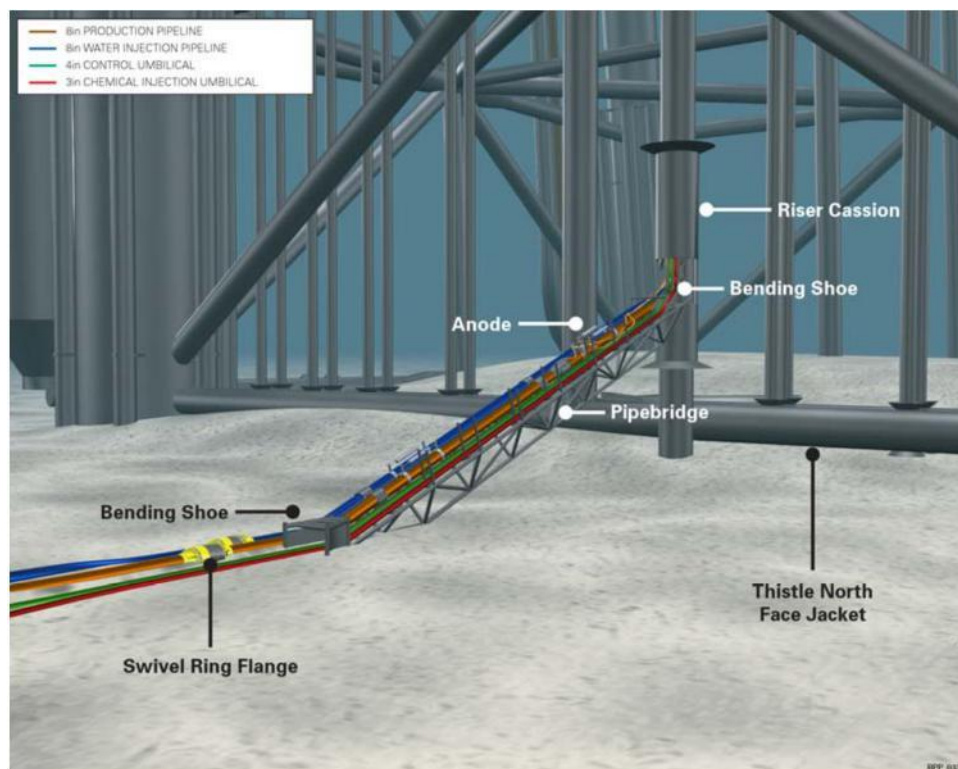


Figure 2.2.2: Don pipebridge at Thistle jacket

2.3 Pipeline crossings

Table 2.3.1: Don pipeline crossing information			
ID	Pipeline, umbilical or cable description	Location	Protection
THISTLE 500 M ZONE			
1	PL4555, PLU2580JSO and PLU2580JSG all cross over PL600	Inside Thistle 500 m zone.	None. Refer Figure 1.6.2.
2	PL4555, PLU2580JSO and PLU2580JSG all cross over PLU6267	Inside Thistle 500 m zone.	Concrete mattress. Refer Figure 1.6.2.
3	The PL4555 flexible catenary riser and the PLU2580 umbilical riser theoretically cross over PL598 & PL599 but at this location the risers are likely suspended in the water column.	Inside Thistle 500 m zone.	None. Refer Figure 1.6.2.
4	The PL2579 catenary umbilical theoretically crosses over PL598 & PL599 but at this location the umbilical is likely suspended in the water column.	Inside Thistle 500 m zone.	None. Refer Figure 1.6.2.
NOTES			
1. For ID (location) refer Figure 1.6.2. 2. All these crossings are third-party crossings that are outside of the scope of this Decommissioning Programme. For PL2579, PLU2580, PLU2580JSO and PLU2580JSG refer Conrie, DSW, WD and Ythan DP [3] & for PL4555 refer the Thistle pipeline DP [6].			



2.4 Inventory Estimates

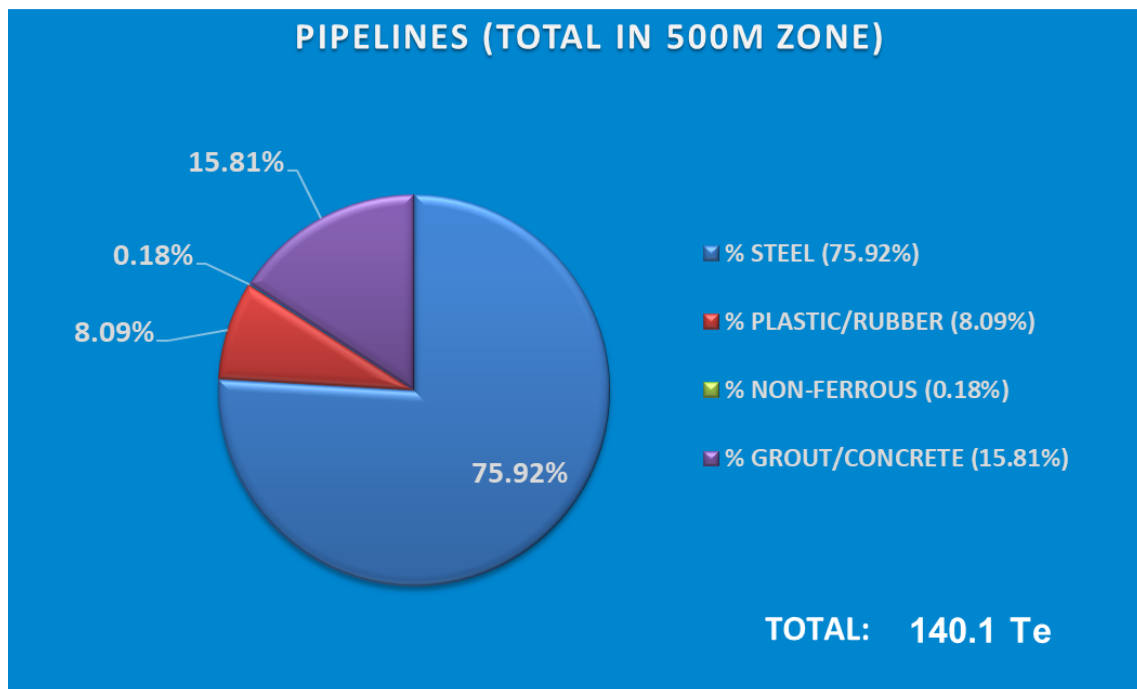


Figure 2.4.1: Pie-chart of estimated material inventory (inside Thistle 500 m zone)

There is some ambiguity as to the extent of pipeline contained within the material inventory included in the original Don DP [1]. In section 1 (page 54 of 174) it is stated that the inventory includes pipeline materials up to the edge of the Thistle 500 m zone, whereas in section 5.1 (Page 110 of 174) it states that the weight and materials of the risers, Don topsides equipment and the pipebridge have not been accounted for. Therefore, the mass of the pipebridge and pipelines on it is included for information (Figure 2.4.2).

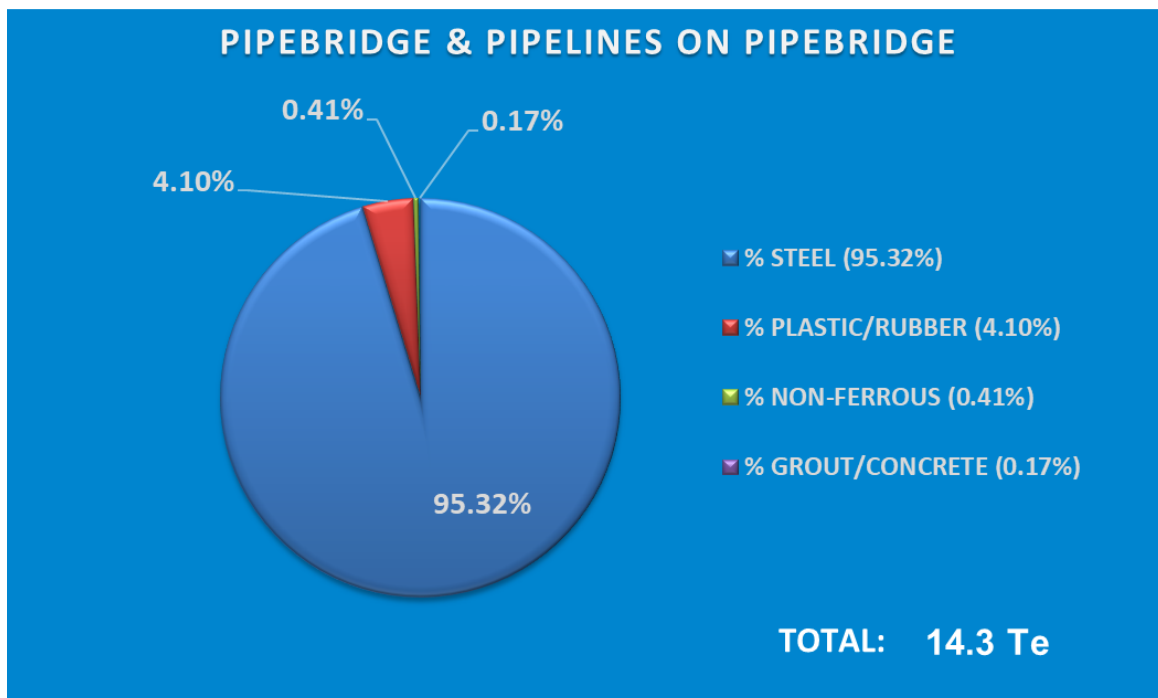


Figure 2.4.2: Estimated material inventory (pipebridge only)



3. REMOVAL AND DISPOSAL METHODS

3.1 Use of Waste Framework Directive

Waste will be dealt with in accordance with the Waste Framework Directive. The re-use of an installation, pipeline, or umbilical pipeline or parts thereof, is first in the order of preferred decommissioning options and such options are currently under investigation. Waste generated during decommissioning will be segregated by type and periodically transported to shore in an auditable manner through licensed waste contractors. Steel and other recyclable metals are estimated to account for the greatest proportion of the materials inventory.

Geographic locations of potential disposal yard options may require the consideration of Transfrontier Shipment of Waste ('TFSW'), including hazardous materials. Early engagement with the relevant waste regulatory authorities will ensure that any issues with TFSW are addressed.

3.2 Pipelines

3.2.1 Decommissioning options

None of the pipelines are candidates for carbon capture, use and storage. BP has assessed options for re-use of the pipelines and none have been found. The re-use option has been excluded from the comparative assessment. The three decommissioning options considered are:

- **Complete removal** – This involves the complete removal of the pipelines by whatever means would be most practicable and acceptable from a technical perspective.
- **Partial removal or remediation** – PL599 only. This would involve removing exposed or potentially unstable sections of pipelines or carrying out remedial work such as the deposition of rock to make the remaining pipeline safe for leaving *in situ*. This option is relevant for pipelines that are known to have exposures or spans. There will be a need to verify their status via future surveys.
- **Leave *in situ*** – This involves leaving the pipeline(s) *in situ* with no remedial works, but possibly needing to verify their status via future surveys.

The method for decommissioning of the surface laid sections of pipelines and pipeline approaches is the same irrespective of which option is pursued. Therefore, decommissioning of these parts of the pipelines are not included in the assessment. All options include removal of features such as pipespools, surface laid sections of pipelines and grout bags in accordance with mandatory guidelines if they are exposed.

There are three decommissioning options presented in Table 3.2.1 for the exposed section in PL599. The reason for this is that at the time of writing the DP it is a decade since a survey was last conducted and the length and/or extent of exposure may have changed, and this may dictate which of the options may be more appropriate. For example, if the length of exposed section has reduced there may be a case for leaving the exposure 'as is' and subject the pipeline to further monitoring. Conversely if the length of the exposure has increased, or the span has become reportable to FishSAFE remedial work may be required.

The pipelines and umbilicals housed inside riser caisson 930 as well as the caisson itself are out of scope and dealt with in the Thistle upper jacket DP [5].



3.2.2 Outcome of the comparative assessment

Table 3.2.1: Pipeline decommissioning proposals		
Pipeline or group	Recommended option	Justification
Pipelines		
PL598	<p>Leave the pipeline <i>in situ</i> and remove surface laid ends. Refer Figure 3.2.1.</p> <p>Remove the surface laid sections from the bottom of riser caisson 930 to the point when the pipeline(s) is buried at end of the transition at trench depth. Estimated length – ~150 m, including length of product(s) on the pipe bridge (25 m long). Bury the end with up to 15 Te of deposited rock. Total ~15 Te of deposited rock.</p> <p>Thereafter, the burial status of the pipeline should be monitored using a Risk Based Inspection regime to a frequency and timescale agreed with OPRED.</p>	Complies with OPRED guidance notes [9]. Recommended outcome of the comparative assessment(s) [1], [4].
PL599	<p>Leave the pipeline <i>in situ</i> and remove the surface laid ends. Assess remediation options should a short-section be found to be exposed. Refer Figure 3.2.1.</p> <p>Remove the surface laid section from the bottom of riser caisson 930 to the point when the pipeline is buried at end of the transition at trench depth. Estimated length ~150 m, including length of product(s) on the pipe bridge (25 m long). Bury the ends with up to 15 Te of deposited rock. Total ~15 Te of deposited rock.</p> <p>Confirm via survey if there is an exposed section starting at KP0.427 (KP measured from pipeline ends flange near Thistle 18.3 m long, including a span 2.5m long, noted in 2013 pipeline survey). The options are: 1) Leave 'as is', 2) remove the exposed section and bury the cut ends under deposited rock, or 3) bury the exposed length under deposited rock). From an environmental perspective the preference would be to leave the exposure <i>in situ</i> and subject the pipeline to monitoring as part of a wider survey strategy.</p> <p>Deposition of rock along PL599 would result in ~63 Te being required to bury the exposed length. Following the survey of PL599 the final decommissioning solution will be discussed and agreed with OPRED.</p> <p>Thereafter, the burial status of the pipeline should be monitored using a Risk Based Inspection regime to a frequency and timescale agreed with OPRED.</p>	Complies with OPRED guidance notes [9]. Recommended outcome of the comparative assessment(s) [1], [4].
PL600, PLU6267	<p>Leave the umbilical <i>in situ</i> Refer Figure 3.2.1.</p> <p>Remove the surface laid sections from the bottom of riser caisson 930 to the point when the umbilical(s) is buried at end of the transition at</p>	Complies with OPRED guidance notes [9]. Recommended outcome of the comparative assessment(s) [1], [4].

Table 3.2.1: Pipeline decommissioning proposals		
Pipeline or group	Recommended option	Justification
	<p>trench depth. Estimated lengths of PL600 and PLU6267 – 160m including length of product on the pipebridge (25m long). Bury the ends in trench with up to 15 Te of deposited rock. Total ~30Te of deposited rock.</p> <p>Thereafter, the burial status of both umbilicals should be monitored using a Risk Based Inspection regime to a frequency and timescale agreed with OPRED.</p>	
NOTES: <ol style="list-style-type: none"> Where the pipelines have been cut, for example where they enter the seabed, remedial work may be required to bury the end of the pipeline. As a contingency measure, small deposits of rock up to 15 Te may need to be used to make sure that the pipeline ends remain buried. 		

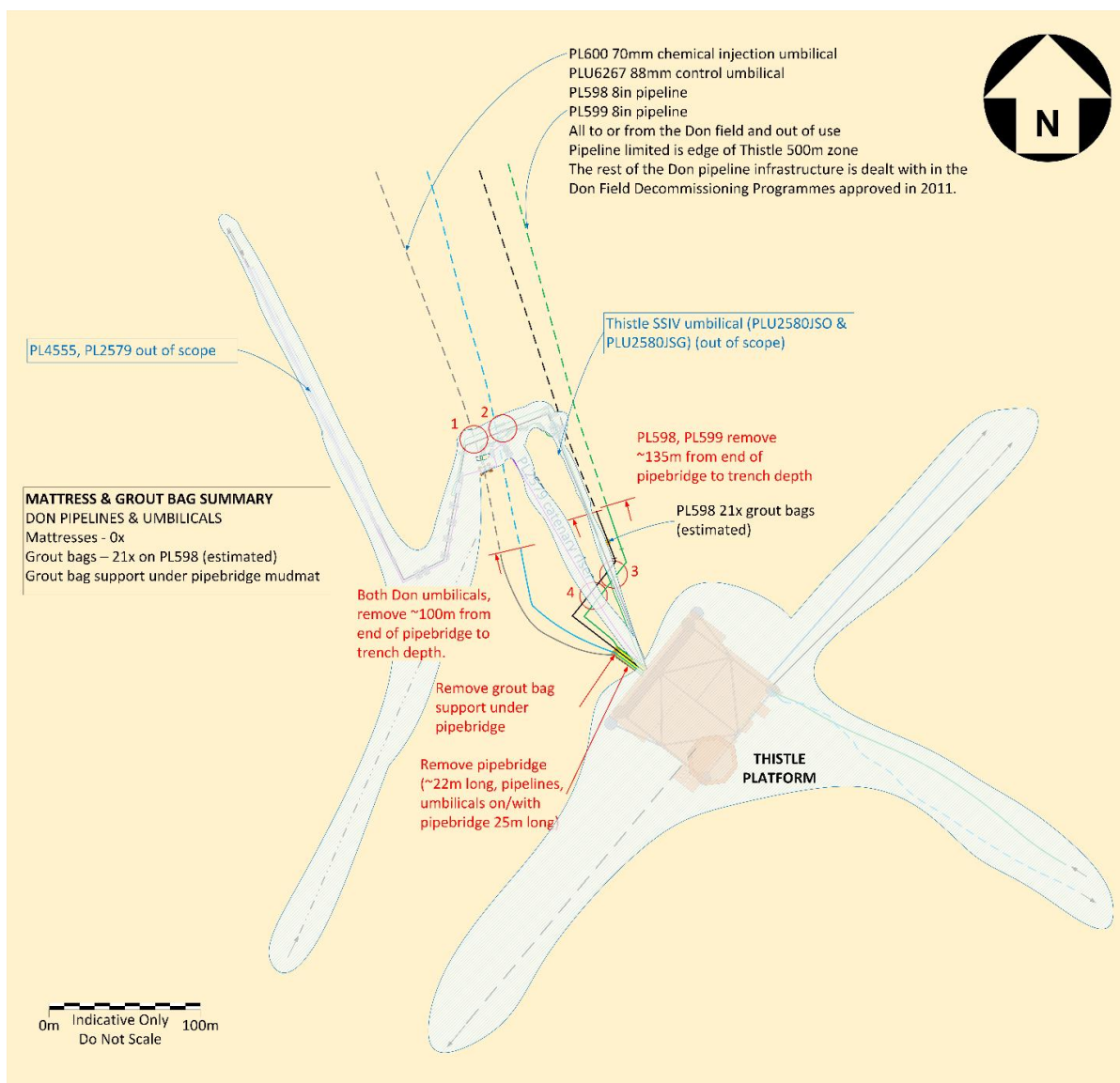


Figure 3.2.1: Don pipelines at Thistle decommissioning proposals



3.3 Pipeline protection and stabilisation features

Table 3.3.1: Pipeline protection & stabilisation features			
Stabilisation Feature	Total No.	Option	Disposal route (if applicable)
THISTLE APPROACHES (INSIDE 500 M ZONE)			
Grout bags (25 kg) on PL598	21	Complete removal.	Return to shore for reuse or recycling.

3.4 Pipeline structures

Table 3.4.1: Subsea pipeline structures & stabilisation features			
Subsea pipeline structure and stabilisation features	No	Option	Disposal Route (if applicable)
Pipebridge	1	Complete removal.	Return to shore for reuse or recycling.
Grout bag	1	Complete removal	Return to shore for reuse or recycling.

3.5 Pipeline crossings

The decommissioning proposals will not affect any pipeline crossing infrastructure. However, the expectation is that the owners of the third -party crossings (e.g. EnQuest) will liaise with Britoil regarding any future decommissioning proposals and such proposals will also be discussed and agreed with OPRED.

3.6 Waste streams

Table 3.6.1: Waste stream management method	
Waste stream	Removal and disposal method
Marine growth	Where necessary and practicable, to allow access some marine growth will be removed offshore. The remainder will be brought to shore and disposed of according to guidelines and company policies and under appropriate permit.
NORM	Tests for Normally Occurring Radioactive Material ('NORM') will be undertaken offshore on the recovery vessel by the Radiation Protection Supervisor and recorded. Any NORM encountered onshore will be dealt with and disposed of in accordance with guidelines and company policies and under appropriate permit.
Other hazardous wastes	Other hazardous waste will be recovered to shore and disposed of according to guidelines and company policies and under appropriate permit.
Onshore dismantling sites	Appropriate licensed sites will be selected. The dismantling site must demonstrate proven disposal track record and waste stream management throughout the deconstruction process and demonstrate their ability to deliver re-use and recycling options.

Table 3.6.2: Inventory disposition			
Inventory	Total inventory (Te)	Planned tonnage to shore (Te)	Planned left <i>in situ</i> (Te)
Don pipelines within Thistle 500 m zone	140.1	61.0	79.1
Pipebridge only	14.3	14.3	0.0

Table 3.6.3: Re-use, recycle & disposal aspirations for recovered material			
Inventory	Re-use	Recycle	Disposal (e.g. Landfill)
Don pipelines within Thistle 500m zone	<5%	>90%	<10%

All recovered material will be transported onshore for re-use, recycling, or disposal. It is not possible to predict the market for reusable materials with any confidence so the figures in Table 3.6.3 are aspirational.



4. ENVIRONMENTAL APPRAISAL OVERVIEW

4.1 Environmental sensitivities

More details of the environmental sensitivities are discussed in the Environmental Appraisal [7].

Thistle is in Block 211/18a of the NNS in water depth of approximately 162 m. Mean residual currents for the field are 0.12m/s, with direction of residual water movement generally to the south or east. Prevailing winds are from the south-west or north-north-east.

The environmental characteristics and sensitivities are listed in [8]. Sediments in the NNS are predominantly sand and muddy sand and in the vicinity of Thistle comprise of sand and gravelly sand. They are such that the seabed area is generally stable with relatively homogenous community. The results of the environmental survey in the Thistle pipeline area suggested a generally uniform background with metal concentrations typical of sediments in this area of the NNS. Moreover, concentrations of hydrocarbons and metals were below recognised toxicity thresholds and were not found to have exerted any notable influence on the macrofaunal community structure.

There are no offshore conservation sites within 40 km of the Thistle 500 m zone (Figure 4.2.1). The North-East Faroe-Shetland Channel Nature Conservation Marine Protected Area ('MPA (NC)') is located approximately 143 km north-west, the Hermaness Saxa Vord and Valla Field Special Protection Area ('SPA') is located approximately 140 km west and the Pobie Bank Reef Special Areas of Conservation ('SAC') is located approximately 103 km southwest of the Thistle platform respectively.

This information is supported by a full pre-decommissioning Environmental Baseline Survey conducted in May 2021 by GEOxyz [8].

4.2 Potential environmental impacts and their management

An EA has been prepared in accordance with the OPRED Decommissioning Guidance Notes [9]. It focusses on the key issues related to the specific activities proposed and the narrative is proportionate to the scale of the project and the environmental sensitivities of the area.

It has been informed by several different processes, including the identification of potential environmental issues through project engineer and marine environmental specialist review in an Environmental Identification ('ENVID') screening workshop and consultation with key stakeholders.

The impact assessment screening identified ten potential impact areas based on the proposed decommissioning activities:

- Atmospheric emissions
- Seabed disturbance
- Physical presence of infrastructure decommissioned *in situ*
- Physical presence of vessels in relation to other sea users
- Underwater noise
- Discharges to sea
- Resource use
- Waste
- Disturbance to seabirds; and,
- Accidental events.

Of these, two were taken forward for assessment based on the potential severity and/or likelihood of their respective environmental impact: seabed disturbance and physical presence of infrastructure decommissioned *in situ*.

- Impact due to physical presence of infrastructure decommissioned *in situ*
- Seabed disturbance

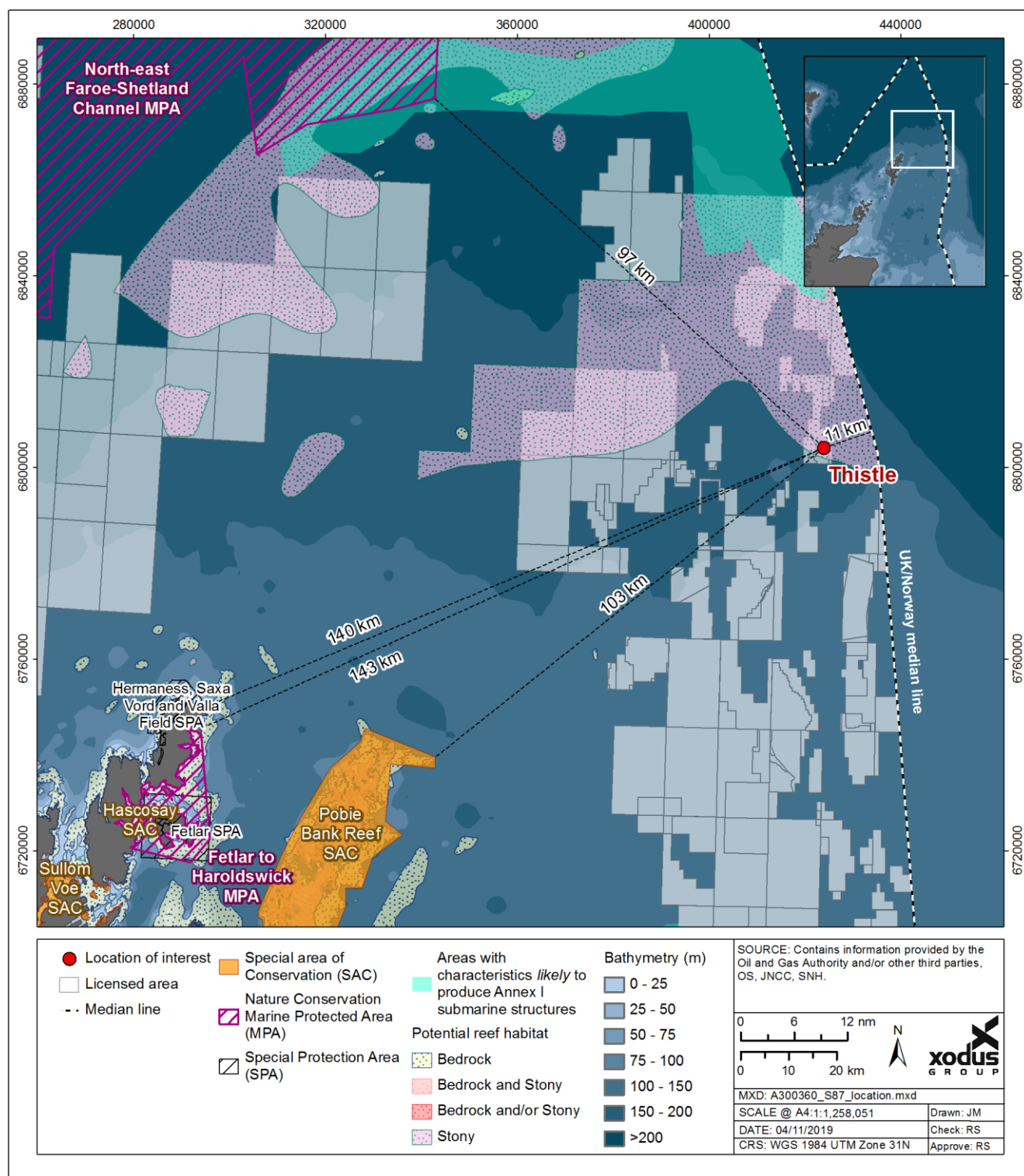


Figure 4.2.1: Protected sites around Thistle and 500 m zone

The environmental impact assessment of these aspects is summarised below.

Impact on physical presence of infrastructure decommissioned *in situ*

Physical presence of infrastructure decommissioned *in situ* was investigated as a potential impact on commercial fisheries. Understanding the use of the Thistle areas for commercial fisheries purposes and the risk posed by exposed infrastructure decommissioned *in situ* as a gear snagging risk was of key importance. Following full assessment of this aspect, taking into consideration fishing, vessel, and shipping activity



within ICES Rectangle 51F1, along with industry and implementation of mitigation measures, the overall assessment was reduced to 'Low'. While the Magnitude of this aspect could not be lowered, both Consequence (spatial extent) and Probability were reduced to 'Low'.

Seabed disturbance

Following full assessment of this aspect, taking into consideration the benthic environment, seabed characteristics, commercial fishing, relatively small size of disturbance area along with industry and implemented mitigation measures, the overall assessment was reduced to 'Low'. While the Probability of this aspect could not be lowered, both Magnitude and Frequency were reduced to 'Low'.

The Environmental Appraisal has considered the relevant Marine Plans, adopted by the UK and Scottish Governments to help ensure sustainable development of the marine area. BP considers that the proposed decommissioning activities are in alignment with its objectives and policies.

Having reviewed the project activities within the wider regional context and taking into consideration the mitigation measures to limit any potential impacts, the findings of the Environmental Appraisal conclude that the activities do not pose any significant threat to environmental or societal receptors within the UKCS.

There will be some planned environmental impacts arising from decommissioning of the Don pipelines. The Long-term environmental impacts from the decommissioning operations are expected to be low. Incremental cumulative impacts and trans-boundary effects associated with the planned decommissioning operations are also expected to be low.



5. INTERESTED PARTY CONSULTATIONS

5.1 Overview

Britoil Limited has consulted a range of interested parties during the decommissioning planning stages and compilation of the Decommissioning Programme. Initial feedback was provided from some initial consultations, and this was followed up with the public and statutory consultation.

During the public and statutory consultation period (12 November to 12 December 2024) copies of the Decommissioning Programme and supporting documents were forwarded to the following Statutory Consultees:

- Global Marine Group (GMG)
- The National Federation of Fishermen's Organisations (NFFO)
- The Northern Ireland Fish Producer's Organisation (NIFPO); and,
- The Scottish Fishermen's Federation (SFF)
- The North Sea Transition Authority (NSTA).

Copies of the Decommissioning Programmes and supporting documents were made available to the consultees and are also accessible as a download from the BP website: https://www.bp.com/en_gb/united-kingdom/home/where-we-operate/north-sea/north-sea-decommissioning.html with the combined Comparative Assessment [4] and Environmental Appraisal [7] being available for download from [https:// www.enquest.com/operations/uk-decommissioning](https://www.enquest.com/operations/uk-decommissioning).

A bound copy was not sent to the local public library but via the Public Notice advice was provided to advise that a digital or hardcopy of the Decommissioning Programmes can be made available on request.

A public notice was published in the following local newspapers by:

- "The Times" on 12 November 2024
- "The (Edinburgh) Gazette" on 12 November 2024.

Please refer to Appendix B.1 for a copy of the public notices. The public notice gave instructions for representations to be made in writing by Thursday 12 December 2024. Britoil Limited received no comments or any written or verbal representation from the public in direct response to the public notice or during the public and statutory consultation period.

Copies of the Decommissioning Programme were also submitted to OPRED.

5.2 Consultation summary

Table 5.2.1: Summary of stakeholder comments		
Stakeholder	Comment	Response
GMG	n/a	n/a
NFFO	n/a	n/a
NIFPO	n/a	n/a
SFF	The decommissioning proposals were presented to SFF as part of a wider presentation concerning the combined Thistle-Don pipeline comparative assessment on 15 November 2023.	No adverse feedback was received.
CONSULTATIONS		
Stakeholder	Comment	Response
GMG	A presentation summarising the decommissioning proposals was sent via email to GMG on 11 November 2024, and the DP was sent via email to GMG on 12	No adverse feedback was received.



Table 5.2.1: Summary of stakeholder comments		
Stakeholder	Comment	Response
	November 2024.	
NFFO	A presentation summarising the decommissioning proposals was sent via email to NFFO on 11 November 2024, and the DP was sent via email on 12 November 2024.	No adverse feedback was received.
NIFPO	A presentation summarising the decommissioning proposals was sent via email to NIFPO on 11 November 2024, and the DP was sent via email on 12 November 2024.	No adverse feedback was received.
SFF	A presentation summarising the decommissioning proposals was sent via email to SFF on 11 November 2024, and the DP was sent via email on 12 November 2024.	No adverse feedback was received, although SFF note that the decommissioning solution for PL599 will be resolved at the time decommissioning activities are carried out. SFF will need to be assured that not snag hazards remain once PL599 has been decommissioned. SFF consider that it is unlikely that the pipeline will have 'self-buried' and so they would have a preference for a permanent decommissioning solution to be adopted in the form of any exposed section either being removed with the cut ends buried under deposited rock. The alternative where the exposed section is completely buried under deposited rock would also be acceptable. The size and profile of any rock should be to normal industry standards. Both solutions should be subject to overtrawl. SFF would wish to be assured that no snagging hazards remain either now or in the future, and would propose that an overtrawl be carried out over areas where pipelines had been removed to ensure that no snagging hazards remain. Following completion of decommissioning, SFF would propose that a permanent monitoring strategy be undertaken.
NSTA	Britoil has engaged with the NSTA under S29(2A) of the Petroleum Act 1998. A presentation summarising the decommissioning proposals was sent via email to NSTA on 11 November 2024, and the DP was sent via email on 12 November 2024.	The infrastructure inside the Thistle 500m zone will be executed as part of the EnQuest Thistle subsea campaign, hence providing a cost effective and efficient execution solution. Engagement with NSTA, on this residual scope, occurs at quarterly EnQuest Thistle joint decommissioning committee meetings. No adverse feedback was received.
Public	Public Notices were issued on 12 November.	No adverse comments were received.



6. PROGRAMME MANAGEMENT

6.1 Project Management and Verification

For and on behalf of the Section 29 notice holders, on behalf of BP, an EnQuest project management team will manage the operations of competent contractors selected for all decommissioning activities. The team will ensure the decommissioning is executed safely, in accordance with legislation and EnQuest HSEA Policy and Principles.

6.2 Post-decommissioning debris clearance and verification

This Decommissioning Programme covers Don pipelines PL598, PL599, PL600 and PLU6267 within the Thistle 500 m zone. A post-decommissioning site survey will be carried out after the decommissioning of the Don and Thistle pipeline infrastructure has been completed.

It is proposed that on behalf of BP, EnQuest will work with OPRED and SFF on behalf of the Section 29 notice holders to investigate use of an evidence-based approach to establish an acceptable clear seabed for the sections of pipeline within the 500 m safety zone. As the seabed is not in an environmentally sensitive area, where it is safe to do so, an overtrawl will be carried out to verify the pipeline corridor and condition of the seabed after decommissioning activities have been completed. The overtrawl will be supported by a Certificate of Clearance. Evidence of a clear seabed will also be included in the Close Out Report and sent to the Seabed Data Centre (Offshore Installations) at the Hydrographic office.

Any oil related debris that is found with the pipeline corridor will be recovered and returned to shore for recycling or appropriate disposal.

The post-decommissioning survey results will be notified to the UK Fisheries Offshore Oil and Gas Legacy Trust Fund Limited for inclusion in the FishSAFE System, and to the United Kingdom Hydrographic Office for notification and marking on Admiralty charts and notices to mariners.

6.3 Schedule

A proposed schedule is provided in Figure 6.3.1. The activities are subject to the acceptance of the Decommissioning Programme presented in this document and any unavoidable constraints (e.g. vessel availability) that may be encountered while executing the decommissioning activities. Therefore, activity schedule windows have been included to account for this uncertainty.

The commencement of offshore decommissioning activities will depend on commercial agreements and commitments.



Don - Activity/Milestone	2024				2025				2026				2027-'33							2034				2035				2036			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	27	28	29	30	31	32	33	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Detailed engineering & proj. management																															
Don pipeline decommissioning inside Thistle 500 m zone																															
Onshore disposal																															
Post-decommissioning surveys ¹																															
Close out report ²																															

Notes / Key

Earliest potential activity

Activity window extended as per NSTA strategy which aspires to combine multiple scopes in a single campaign

A wide activity window is proposed in order to increase the opportunity to capture cost efficiencies by decommissioning at scale (a strategic priority of the North Sea Transition Authority ('NSTA') Decommissioning Strategy) e.g. via EnQuest's commitment to explore scope aggregation opportunities as a member of the Subsea Decommissioning Collaboration

1. Post decommissioning surveys to follow completion of decommissioning activities;

2. Close out report within 1 year of completion of offshore activities.

Figure 6.3.1: Gantt-chart of project plan



6.4 Interim Monitoring and Evaluation

Monitoring of the Don pipelines will continue until the pipelines are decommissioned. They were last surveyed in 2013, and the next survey is scheduled for 2026 to coincide with other pipeline surveys in the area. Thereafter, subject to agreement with OPRED the pipelines will next be surveyed after they have been decommissioned. The frequency of surveys will not prejudice the ability to decommission these pipelines in future.

6.5 Costs

Decommissioning costs will be provided separately to OPRED.

6.6 Close Out

After the pipelines have been decommissioned, OPRED will be notified, and a decommissioning close out report will be submitted within 1 year following the completion of the offshore scope including debris removal, an independent verification of seabed clearance and the first post-decommissioning environmental survey.

Any variances from the approved Decommissioning Programme will be explained in the close out report.

6.7 Post-decommissioning monitoring and evaluations

For and on behalf the Section 29 notice holders and on behalf of BP, EnQuest will carry out a post-decommissioning environmental survey, centred on the Don pipelines. A survey of the status of the pipelines and adjacent seabed will be undertaken at the end of the decommissioning activities. As it is proposed to leave the pipelines *in situ*, they will be subject to a monitoring programme agreed between BP and OPRED.

A copy of the survey results will be provided to OPRED. After these have been reviewed, a future monitoring regime will be agreed by all parties and take account of ongoing liability, the status and findings of previous surveys and a risk-based approach to frequency and scope.

Residual liability for the pipelines will remain with the Section 29 notice holders identified in section 1.4. Unless agreed otherwise in advance with OPRED, BP will remain the focal point for this including any change in ownership.



7. REFERENCES

Please note the link names presented below have been abbreviated.

- [1] BP (2011) Don Field Decommissioning Programme, DON-BP-001, May 2011. Weblink last accessed 10 June 2023: [DON-BP-001.pdf](#)
- [2] Decom North Sea (2018). Environmental Appraisal Guidelines: Offshore Oil and Gas Decommissioning
- [3] EnQuest (2021) Conrie, Don South-West, West Don & Ythan Decommissioning Programmes, M4109-ENQ-NPR-DN-00-PRG-0002. Weblink last accessed 11 June 2023: [C-DSW-WD-Y DP.pdf](#)
- [4] EnQuest (2024) Thistle & Don pipeline Comparative Assessment, M3525-ENQ-THI-DN-0000-REP-0006
- [5] EnQuest (2024) Thistle upper jacket Decommissioning Programme, M3525-ENQ-THI-DN-0000-REP-0008
- [6] EnQuest (2024) Thistle pipeline Decommissioning Programme, M3525-ENQ-THI-DN-0000-REP-0012
- [7] EnQuest (2024) Thistle & Don pipeline Decommissioning Environmental Appraisal, M3525-XOD-THI-DN-0000-ENS-0001
- [8] GeoXYZ (2022) Thistle Final Environmental Baseline & HAS Survey Results Report, M3525-GXY-THI-DN-0000-REP-0008
- [9] OPRED (2018) Guidance Notes, Decommissioning of Offshore Oil and Gas Installations and Pipelines under the Petroleum Act 1998, Version 6, Department of Energy Security and Net Zero. Weblink last 19 May 2021: [OPRED Guidance Notes](#).



APPENDIX A THISTLE BASELINE ENVIRONMENT

Appendix A.1 Summary of characteristics & sensitivities

Table A.1.1: Summary of environmental characteristics and sensitivities
<p>Physical Environment: Thistle Alpha is in Block 211/18 and 211/19 of the NNS in water depth of approximately 162 m. Mean residual currents in the area are 0.26 m/s and are generally from the west. Prevailing winds are from the south or south-west.</p>
<p>Seabed Sediments and Contamination: Sediments in the NNS are predominantly sand and within the Thistle area are classified as sand, slightly gravelly sand, and gravelly sand. MBES identifies a drill cuttings pile below the platform, and historical records of Oil Based Mud discharge will likely result in elevated levels of hydrocarbon contamination in the vicinity of the platform. The pipelines are not affected.</p>
<p>Fish: The Thistle field lies within ICES Rectangle 51F1. Thistle is known to have spawning grounds in the area for Cod (Jan-April), Haddock (Feb-May), Norway Pout (Jan-Mar), Saithe (Jan-Apr) and Whiting (Feb-June). The area is used as nursery grounds for Blue Whiting, Haddock, European Hake, Herring, Ling, Mackerel, Norway Pout, Spurdog and Whiting.</p>
<p>Benthic Communities: Surveys in 2007 and 2018 identified a generally diverse homogenous faunal community associated with sandy sediments. Visible fauna observed included <i>annelida</i>, <i>arthropoda</i>, <i>decapoda</i>, <i>bryozoa</i>, <i>cnidaria</i> and <i>echinoidea</i> typical of the area. It is expected that elevated levels of hydrocarbons close to the platform will lead to modified communities of hydrocarbon tolerant species. There was no evidence from seabed imagery of any protected habitats or species.</p>
<p>Plankton: The phytoplankton community is dominated by the dinoflagellate genus <i>Ceratium</i> (<i>C. fusus</i>, <i>C. furca</i>, <i>C. lineatum</i>), along with the diatoms, <i>Thalassiosira</i> spp. and <i>Chaetoceros</i> spp. The zooplankton community comprises <i>C. helgolandicus</i> and <i>C. finmarchicus</i> as well as <i>Paracalanus</i> spp., <i>Pseudocalanus</i> spp., <i>Acartia</i> spp., <i>Temora</i> spp. and <i>Oithona</i> spp. larger zooplankton species such as euphausiids and decapod larvae are also important in the area.</p>
<p>Seabirds: The following species have been recorded in the wider area: Northern fulmar, Northern gannet, Great skua, Black-legged kittiwake, Arctic skua, Razorbill, European storm petrel, Great black-backed gull, Lesser black-backed gull, Herring gull, Common guillemot, Glaucous gull, little auk, and Atlantic puffin. These seabirds are present for most of the year except October with overall numbers greatest in August and September. As is typical for the North Sea breeding occurs between April and September. Seabird sensitivity in the Thistle area is low for most of the year except for winter months (Nov-Jan) where it is classed as 'high'. The Thistle field is located ~201km North-East of Shetland and is remote for sensitive seabird breeding areas on the coast.</p>
<p>Marine Mammals: Harbour porpoise have been sighted in moderate densities in July and low densities in May and August, whilst both killer whales and minke whales have been sighted in moderate densities in July. Atlantic white-sided dolphin, Risso's dolphin and long-finned pilot whale may be considered occasional visitors.</p>
<p>Conservation Designations: There are no designated conservation sites close to Thistle, with the nearest being the Pobie Bank Reef Sites of Community Importance (103 km south-west), the North-East Faroe-Shetland Channel Nature Conservation Marine Protected Area (97 km north-west).</p>
<p>Commercial Fisheries: The project area lies within ICES rectangle 51F1. Commercial fishing activity within this area is medium to high in comparison with other areas. Landings are a combination of demersal, pelagic and shellfish species representing 0.19% of total UK fishing value in 2018.</p>
<p>Shipping: Shipping density within the area is low, with any traffic associated with oil and gas developments or cargo vessels.</p>
<p>Other Offshore Industries: Thistle is in the northern North Sea oil and gas development area with several fields nearby.</p>
<p>Other Users of the Sea: There are no active telecommunication cables within ~30km of the facility. There are no Ministry of Defence exercise areas or danger areas nearby that might be used for military training. There is only one wreck located within Block 211/18.</p>



APPENDIX B PUBLIC NOTICE & CONSULTEE CORRESPONDENCE

Appendix B.1 Public Notices

ENVIRONMENT & INFRASTRUCTURE

ENERGY

PUBLIC NOTICE THE PETROLEUM ACT 1998 DECOMMISSIONING OF DON PIPELINES INSIDE THISTLE 500M ZONE

Britoil Limited as Operator, has submitted, for the consideration of the Secretary of State for Energy Security and Net Zero, a draft Decommissioning Programme for the "Don Pipelines inside the Thistle 500m Zone" in accordance with the provisions of the Petroleum Act 1998. It is a requirement of the Act that interested parties be consulted on such decommissioning proposals.

The pipelines covered by the Decommissioning Programme are those elements of Don subsea infrastructure located inside the Thistle 500m zone ie:

- PL600
- PLU6267
- PL598
- PL599

The 500m zone is located around the Thistle platform located at 61°21.7821' N 1°34.78567' E.

Britoil Limited gives notice that the Decommissioning Programmes for the Don Pipelines inside the Thistle 500m Zone can be viewed and downloaded at internet address:

https://www.bp.com/en_gb/united-kingdom/home/where-we-operate/north-sea/north-sea-decommissioning.html

Alternatively, a digital or hardcopy of the Decommissioning Programme can be requested by email to decommissioning1@bp.com.

Interested parties are kindly requested to submit any representations for the attention of Gordon Carlile preferably via email to decommissioning1@bp.com or in writing using the contact details below, where they should be received by 12 December 2024 and should state the grounds upon which any representations are being made.

Gordon Carlile
Decommissioning Project Lead
Britoil Ltd
Chertsey Road
Sunbury-on-Thames
TW16 7LN
Date 12 November 2024

(4751940)

2006 NOTICES PUBLISHED ONLINE 12 NOVEMBER 2024 | EDINBURGH GAZETTE

THE TIMES | Tuesday November 12 2024

PUBLIC NOTICE THE PETROLEUM ACT 1998 DECOMMISSIONING OF DON PIPELINES INSIDE THISTLE 500M ZONE

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https://www.bp.com/en_gb/united-kingdom/home/where-we-operate/north-sea/north-sea-decommissioning.html

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Interested parties are kindly requested to submit any representations for the attention of Gordon Carlile preferably via email to decommissioning1@bp.com or in writing using the contact details below, where they should be received by 12 December 2024 and should state the grounds upon which any representations are being made.

Gordon Carlile
Decommissioning Project Lead
Britoil Ltd
Chertsey Road
Sunbury-on-Thames
TW16 7LN
Date 12 November 2024

Figure B.1.1: Public Notices (The Edinburgh Gazette (L), The Times (R) published 12 Nov 2024



Appendix B.2 GMG – Ms Chloe Morris

From: Chloe Morris

Sent: 20 November 2024 14:59

To: Simon Axon

Subject: RE: REQUEST: Decommissioning Programme for Don pipelines in the Thistle 500m Safety Zone - Public & Statutory Consultation

Good day Simon,

Thank you for sending through the details on the decommissioning programme for the pipelines and SALM base of the Thistle Alpha.

I have reviewed the content provided for the 500m zone located around the Thistle Platform and there are no active telecom cables in the vicinity. The distance from the Oil Field is approximately 30km to the nearest Active FO cable. I note in your attached PDF "The closest submarine telecommunication cable is the CANTAT-3 telecommunications cable owned by Faroese Telecom within 1km to the south-west of Thistle." – this is incorrect and perhaps left in from a previous DP?

In the event that the decom program changes, and seabed invasive operations are to occur near existing telecom infrastructure, it will be important to notify any nearby cable owners of any upcoming operations. Contact details of the cable owners can be sourced from <https://kis-orca.org/map/>

Kind regards,

Chloe

From: Simon Axon

Sent: 12 November 2024 06:02

To: Chloe Morris

Subject: REQUEST: Decommissioning Programme for Don pipelines in the Thistle 500m Safety Zone - Public & Statutory Consultation

Dear Chloe,

I am sending this for and on behalf of Britoil Limited.

PUBLIC NOTICE

THE PETROLEUM ACT 1998

DECOMMISSIONING OF DON PIPELINES INSIDE THISTLE 500M ZONE

Britoil Limited as Operator, has submitted, for the consideration of the Secretary of State for Energy Security and Net Zero, a draft Decommissioning Programme for the "Don Pipelines inside the Thistle 500m Zone" in accordance with the provisions of the Petroleum Act 1998. It is a requirement of the Act that interested parties be consulted on such decommissioning proposals.

The pipelines covered by the Decommissioning Programme are those elements of Don subsea infrastructure located inside the Thistle 500m zone ie:

PL600, PLU6267, PL598, PL599

The 500m zone is located around the Thistle platform located at 61°21.7821' N 1°34.78567' E.

Britoil Limited gives notice that the Decommissioning Programmes for the Don Pipelines inside the Thistle 500m Zone can be viewed and downloaded at internet address:

https://www.bp.com/en_gb/united-kingdom/home/where-we-operate/north-sea/north-sea-decommissioning.html

Alternatively, a digital or hardcopy of the Decommissioning Programme can be requested by email to decommissioning1@bp.com.

Interested parties are kindly requested to submit any representations for the attention of Gordon Carlile preferably via email to decommissioning1@bp.com or in writing using the contact details below, where they should be received by 12 December 2024 and should state the grounds upon which any representations are being made.

Gordon Carlile



Decommissioning Project Lead

Britoil Ltd

Chertsey Road

Sunbury-on-Thames

TW16 7LN

Date 12 November 2024

Please note that the supporting Comparative Assessment (CA) and Environmental Appraisal (EA) for these pipelines have been included in the CA and EA for the Thistle pipelines and these can be found at the following link: www.enquest.com/operations/uk-decommissioning.

Best wishes,

Simon

Simon Axon

Director, Laptech Ltd

Web: www.laptech.co.uk



Appendix B.3 NFFO – Mr Ian Rowe

From: Simon Axon

Sent: 12 November 2024 06:01

To: Ian Rowe

Cc: Chris Traves

Subject: REQUEST: Decommissioning Programme for Don pipelines in the Thistle 500m Safety Zone - Public & Statutory Consultation

Dear Ian,

I am sending this for and on behalf of Britoil Limited.

PUBLIC NOTICE

THE PETROLEUM ACT 1998

DECOMMISSIONING OF DON PIPELINES INSIDE THISTLE 500M ZONE

Britoil Limited as Operator, has submitted, for the consideration of the Secretary of State for Energy Security and Net Zero, a draft Decommissioning Programme for the “Don Pipelines inside the Thistle 500m Zone” in accordance with the provisions of the Petroleum Act 1998. It is a requirement of the Act that interested parties be consulted on such decommissioning proposals.

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PL600, PLU6267, PL598. PL599

The 500m zone is located around the Thistle platform located at 61°21.7821' N 1°34.78567' E.

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Gordon Carlile

Decommissioning Project Lead

Britoil Ltd

Chertsey Road

Sunbury-on-Thames

TW16 7LN

Date 12 November 2024

Please note that the supporting Comparative Assessment (CA) and Environmental Appraisal (EA) for these pipelines have been included in the CA and EA for the Thistle pipelines and these can be found at the following link: www.enquest.com/operations/uk-decommissioning.

Best wishes,

Simon

Simon Axon

Director, Laptech Ltd

Web: www.laptech.co.uk



NFFO Services Ltd



30 Monkgate
York
YO31 7PF
Tel: 01904 635 432
13th December 2024.

Hello Simon

In reference to the Decommissioning Programme of the Don pipelines inside the Thistle 500 Zone.

Due to the geographical area of the planned decommissioning of asset in Scottish Waters I can confirm the NFFO have no comments to make regarding the decommissioning program.

The Scottish Fishermen's Federation who we work closely with are best placed to comment and raise any concerns if required.

Kind Regards

Ian Rowe

NFFO Services

General Manager.



Appendix B.4 NIFPO – Mr Wayne Sloan & Mr Harry Wick

From: Harry Wick

Sent: 16 December 2024 09:22

To: Simon Axon; Wayne Sloan

Subject: RE: Decommissioning Programme for Don pipelines in the Thistle 500m Safety Zone - Public & Statutory Consultation Ended 12 December 2024

Hi Simon, That's outside our area of interest. Kind Regards, Harry

=====

From: Simon Axon

Sent: 12 November 2024 06:01

To: Wayne Sloan <waynes@fpooffshoreservices.co.uk>; harry.wick@nifpo.co.uk

Subject: REQUEST: Decommissioning Programme for Don pipelines in the Thistle 500m Safety Zone - Public & Statutory Consultation

Dear Wayne & Harry,

I am sending this for and on behalf of Britoil Limited.

PUBLIC NOTICE

THE PETROLEUM ACT 1998

DECOMMISSIONING OF DON PIPELINES INSIDE THISTLE 500M ZONE

Britoil Limited as Operator, has submitted, for the consideration of the Secretary of State for Energy Security and Net Zero, a draft Decommissioning Programme for the "Don Pipelines inside the Thistle 500m Zone" in accordance with the provisions of the Petroleum Act 1998. It is a requirement of the Act that interested parties be consulted on such decommissioning proposals.

The pipelines covered by the Decommissioning Programme are those elements of Don subsea infrastructure located inside the Thistle 500m zone ie:

PL600, PLU6267, PL598, PL599

The 500m zone is located around the Thistle platform located at 61°21.7821' N 1°34.78567' E.

Britoil Limited gives notice that the Decommissioning Programmes for the Don Pipelines inside the Thistle 500m Zone can be viewed and downloaded at internet address:

https://www.bp.com/en_gb/united-kingdom/home/where-we-operate/north-sea/north-sea-decommissioning.html

Alternatively, a digital or hardcopy of the Decommissioning Programme can be requested by email to decommissioning1@bp.com.

Interested parties are kindly requested to submit any representations for the attention of Gordon Carlile preferably via email to decommissioning1@bp.com or in writing using the contact details below, where they should be received by 12 December 2024 and should state the grounds upon which any representations are being made.

Gordon Carlile

Decommissioning Project Lead

Britoil Ltd

Chertsey Road

Sunbury-on-Thames

TW16 7LN

Date 12 November 2024

Please note that the supporting Comparative Assessment (CA) and Environmental Appraisal (EA) for these pipelines have been included in the CA and EA for the Thistle pipelines and these can be found at the following link: www.enquest.com/operations/uk-decommissioning.

Best wishes,

Simon

Simon Axon, Director, Laptech Ltd, Web: www.laptech.co.uk



Appendix B.5 SFF - Mr Fahim Mohammad Hashimi

From: Mohammad Fahim Hashimi

Sent: 18 December 2024 12:13

To: BP Decommissioning email

Cc: Gordon.Carlile; Simon Axon; Steven Alexander; Elspeth Macdonald

Subject: RE: REQUEST: Decommissioning Programme for Don pipelines in the Thistle 500m Safety Zone - Public & Statutory Consultation

Dear Gordon/Simon

The Scottish Fishermen's Federation (SFF) appreciates the clearly laid out and detailed explanation of Britoil Ltd decommissioning proposals for the Don Pipelines inside the Thistle 500m Zone Decommissioning Programme and place on record our appreciation of the information provided.

Please find attached the SFF's response to the above-mentioned consultation for your reference.

Should you have any questions, feel free to contact me.

Best wishes

Fahim Mohammad Hashimi

Offshore Energy Policy Manager



Our Ref: FH-Britoil Ltd/Don Pipelines in Thistle 500mSZ/001/0024

Your Ref: Email dated 12/11/2024

18 December 2024

Scottish Fishermen's Federation
24 Rubislaw Terrace
Aberdeen, AB10 1XE
Scotland UK
T: +44 (0) 1224 646944
F: +44 (0) 1224 647058
E: sff@sff.co.uk

www.sff.co.uk

Gordon Carlile
Decommissioning Project Lead
Britoil Ltd
Chertsey Road
Sunbury-on-Thames
TW16 7LN

Dear Gordon

Draft Decommissioning Programme for Don Pipelines in Thistle 500m Safety Zone

I refer to the Consultation on Draft Decommissioning Programme provided in your email of 12 November 2024.

The Scottish Fishermen's Federation (SFF) appreciates the clearly laid out and detailed explanation of Britoil Ltd decommissioning proposals for the Don Pipelines inside the Thistle 500m Zone Decommissioning Programme and place on record our appreciation of the information provided.

The SFF note that the Decommissioning Programme (DP) is for the sections of the Don pipelines inside the Thistle 500m zone. The Don pipelines include:

- PL598, trenched and buried except for surface laid sections near Thistle, ~0.567 km long (17.44 km)
- PL599, trenched and buried except for surface laid sections near Thistle, 0.570 km long (17.34 km)
- PL600, trenched and buried except for surface laid section near Thistle, ~0.56 km long (17.73 km)
- PLU6267 trenched and buried, except for surface laid section near Thistle, ~0.50 km long (17.73 km) and,
- the pipe bridge supporting these pipelines as they approach the riser sections.



In terms of the verification of clear seabed in section 6.2, SFF welcome following Britoil Ltd statement and look forward to working with Britoil Ltd to make the overtrawl sweeps happen:

“This Decommissioning Programme covers Don pipelines PL598, PL599, PL600 and PLU6267 within the Thistle 500 m zone. A post-decommissioning site survey will be carried out after the decommissioning of the Don and Thistle pipeline infrastructure has been completed.

It is proposed that on behalf of BP, EnQuest will work with OPRED and SFF on behalf of the Section 29 notice holders to investigate use of an evidence-based approach to establish an acceptable clear seabed for the sections of pipeline within the 500 m safety zone. As the seabed is not in an environmentally sensitive area, where it is safe to do so, an overtrawl will be carried out to verify the pipeline corridor and condition of the seabed after decommissioning activities have been completed.”

Given past experiences of both abandoned wellhead and oil and gas field decommissioning works, the SFF would take the opportunity to reaffirm that it has serious reservations regarding the use of survey data to verify that an area is safe for fishing activity to resume following decommissioning activity. It is our view that the undertaking of trawl verification sweeps under controlled conditions, which replicated the fishing operations that will be permitted in the area following the decommissioning work, is the best method of establishing that it is safe for fishing to resume in said area.

Interim Monitoring and Evaluation

The SFF note from Section 6.4 that monitoring of the Don pipelines will continue until the pipelines are decommissioned. They were last surveyed in 2013, and the next survey is scheduled for 2026 to coincide with other pipeline surveys in the area. Thereafter, subject to agreement with OPRED the pipelines will next be surveyed after they have been decommissioned. The frequency of surveys will not prejudice the ability to decommission these pipelines in future.

Considering the trenched and buried nature of the Don pipelines, the SFF propose that a permanent monitoring programme should be adopted to ensure any possible spans created in the future are timely detected and remediated to prevent snagging hazard to fishing vessels.

The Federation having stated the above position, would reaffirm its appreciation of the decommissioning plans provided and its wish to work closely and positively with the Britoil Ltd Team, as you work through the challenges before you.

In conclusion, SFF's main objective is to protect and promote its constituent member associations interest. Therefore, we propose that the safety of our members is ensured, and their operations are not disrupted throughout any stages offshore oil and gas developments.

Yours sincerely,

Fahim Mohammad Hashimi
Offshore Energy Policy Manager
Scottish Fishermen's Federation
f.hashimi@sff.co.uk
M: +44 (0) 7821 660914



The Don pipeline infrastructure inside the Thistle 500 m zone will be decommissioned at the same time as the Thistle pipeline infrastructure.

For your information, I can advise that the SFF's Oil and Gas Decommissioning Policy and accompanying Key Principles document can be viewed via the SFF's website using the following link: https://s3.eu-west-2.amazonaws.com/assets.sff.co.uk/publications/DecomPolicy_Final_0808_lowres.pdf and https://s3.eu-west-2.amazonaws.com/assets.sff.co.uk/publications/DecomPolicy_KeyPrinciples_0808_lowres.pdf.

As highlighted in the SFF's Oil and Gas Decommissioning Policy documentation, the concerns of fishermen are primarily that of safety and the physical impact on the fishing grounds of the long-term presence of oil industry infrastructure on the seabed. With this in mind, the SFF's preferred position with regard to the decommissioning of oil and gas infrastructure is one of total removal.

The SFF welcome Britoil Ltd decisions on total removal of the pipe bridge and surface laid section of the pipelines (PL598, PL599, PL600 and PLU6267) and their associated protection and stabilisation features (Grout bags).

Pipelines decom

The SFF note from Table 1.5.1 (p8) that, as per the CA, all pipelines will be left in situ except for the short-surface laid sections near the Thistle platform. The surface laid sections of the pipelines will be removed down to trench depth. A small quantity of rock will be deposited to bury cut pipeline ends inside the trench. However, a contradictory decom proposal has been suggested for PL599 (see below).

PL599

There are three decommissioning options presented in Table 3.2.1 for the exposed section in PL599: 1) Leave 'as is', 2) remove the exposed section and bury the cut ends under deposited rock, or 3) bury the exposed length under deposited rock).

This is due to existing uncertainty about the exposed section starting at KP0.427. The SFF are of the view that the exposure noted in 2013 will not have self-rectified and one could assume it will at best remain status quo therefore option 2) 'remove the exposed section and bury the cut ends under deposited rock', would be a preference in the interest of safety to commercial fisheries with option 3) 'bury the exposed length under deposited rock', being also agreeable opposed to from an environmental perspective the preference would be to leave the exposure in situ and subject the pipeline to monitoring as part of a wider survey strategy.

In addition, being concerned of fishermen's safety, we propose that a permanent monitoring strategy should be adopted to ensure any possible spans created in the future are timely detected and remediated to prevent snagging hazard to fishing vessels. Furthermore, we would propose that all areas of removed surface laid pipelines should be over-trawled to ensure no snagging hazard is left behind on the seabed to fishing vessels.

Rock deposit

As you will be aware, any pipelines and associated materials left on the seabed represent a legacy issue and will require on going monitoring. Where rock cover is deployed, we would look for the size and profile of the rock to follow normal industry standards and would recommend that such rock dump berms are incorporated into the post decommissioning debris clearance trawl sweeps to verify that, at the time of deposit, they did not pose a risk to fishing.

Verification survey



From: Simon Axon

Sent: 12 November 2024 06:01

To: Mohammad Fahim Hashimi

Cc: Steven Alexander; Andrew Third; Andrew Innes

Subject: REQUEST: Decommissioning Programme for Don pipelines in the Thistle 500m Safety Zone - Public & Statutory Consultation

Dear Fahim,

I am sending this for and on behalf of Britoil Limited.

PUBLIC NOTICE

THE PETROLEUM ACT 1998

DECOMMISSIONING OF DON PIPELINES INSIDE THISTLE 500M ZONE

Britoil Limited as Operator, has submitted, for the consideration of the Secretary of State for Energy Security and Net Zero, a draft Decommissioning Programme for the "Don Pipelines inside the Thistle 500m Zone" in accordance with the provisions of the Petroleum Act 1998. It is a requirement of the Act that interested parties be consulted on such decommissioning proposals.

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Interested parties are kindly requested to submit any representations for the attention of Gordon Carlile preferably via email to decommissioning1@bp.com or in writing using the contact details below, where they should be received by 12 December 2024 and should state the grounds upon which any representations are being made.

Gordon Carlile

Decommissioning Project Lead

Britoil Ltd

Chertsey Road

Sunbury-on-Thames

TW16 7LN

Date 12 November 2024

Please note that the supporting Comparative Assessment (CA) and Environmental Appraisal (EA) for these pipelines have been included in the CA and EA for the Thistle pipelines and these can be found at the following link: www.enquest.com/operations/uk-decommissioning.

Best wishes,

Simon

Simon Axon

Director, Laptech Ltd

Web: www.laptech.co.uk



Appendix B.6 NSTA – Claire Hepworth & NSTA Decom Team

From: Peter Cacela

Sent: 13 December 2024 12:27

To: Simon Axon

Cc: Michele Backwell (North Sea Transition Authority); Claire Hepworth (North Sea Transition Authority); DecomTeam; Alasdair Thomas (North Sea Transition Authority)

Subject: RE: REMINDER: Decommissioning Programme for Don pipelines in the Thistle 500m Safety Zone - Public & Statutory Consultation Ended 12 December 2024

Hi Simon,

Thanks for the call just now.

The NSTA considers that the pre-submission consultation regarding the framing of the subject DP has been adequately completed via the NSTA's Stewardship process and supported by participation in bp's routine engagements with OPRED, including in February 2024.

Kind regards,

Peter

Decommissioning Stewardship Engineer

=====

From: Simon Axon

Sent: 12 November 2024 06:02

To: Claire Hepworth

Subject: REQUEST: Decommissioning Programme for Don pipelines in the Thistle 500m Safety Zone - Public & Statutory Consultation

Dear Claire & NSTA Decom Team,

I am sending this for and on behalf of Britoil Limited.

PUBLIC NOTICE

THE PETROLEUM ACT 1998

DECOMMISSIONING OF DON PIPELINES INSIDE THISTLE 500M ZONE

Britoil Limited as Operator, has submitted, for the consideration of the Secretary of State for Energy Security and Net Zero, a draft Decommissioning Programme for the "Don Pipelines inside the Thistle 500m Zone" in accordance with the provisions of the Petroleum Act 1998. It is a requirement of the Act that interested parties be consulted on such decommissioning proposals.

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Gordon Carlile

Decommissioning Project Lead

Britoil Ltd

Chertsey Road



Sunbury-on-Thames

TW16 7LN

Date 12 November 2024

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Best wishes,

Simon

Simon Axon

Director, Laptech Ltd

Web: www.laptech.co.uk



APPENDIX C LETTER OF SUPPORT

Appendix C.1 Chrysaor (UK) Theta Limited

Harbour Energy
Upper Denburn House
Kingswells
Aberdeen, AB15 6PU
harbourenergy.com



Offshore Petroleum Regulator for Environment and Decommissioning
AB1 Building (Wing C)
Crimon Place
Aberdeen
AB10 1BJ

22/04/2025

Dear Sir/Madam

PETROLEUM ACT 1998 DON DECOMMISSIONING PROGRAMME FOR PIPELINES IN THISTLE 500M ZONE

We acknowledge receipt of your letter 9 April 2025.

We, Chrysaor (U.K.) Theta Limited, confirm that we authorise Britoil Limited to submit on our behalf the abandonment programme relating to the Don Pipelines in the Thistle 500m Safety Zone as directed by the Secretary of State on 9 April 2025.

We confirm that we support the proposals detailed in the "Don Decommissioning Programme for Pipelines in Thistle 500m Zone" dated 17 April 2025, which is to be submitted by Britoil Limited in so far as they relate to those facilities in respect of which we are required to submit an abandonment programme under Section 29 of the Petroleum Act 1998.

Yours faithfully

Michael Burnett (Apr 23, 2025 06:54 GMT)

Mike Burnett
Senior Manager - Decommissioning

For and on behalf of Chrysaor (U.K.) Theta Limited (Company Number 01491002)