

Our Ref: 01.01.01.01-6626U  
UKOP Doc Ref:1399245



Offshore Petroleum Regulator  
for Environment  
& Decommissioning

TOTALENERGIES E&P UK LIMITED  
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Registered No.: 00811900

Date: 10th June 2025

Department for Energy Security &  
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Dear Sir / Madam

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

**PIPELINE PL2759 (Victory Hot Tap Tee HTT1-2)**

I refer to your amended application dated 6th June 2025, reference PL/2554/1 (Version 2).

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

A screening direction is therefore issued for the changes to the project. An amended schedule of conditions, comments, and main reasons for the decision on the amended application, are attached. A copy of this screening direction will be forwarded to the application consultees, the Oil and Gas Authority and published on the gov.uk website.

If you have any queries in relation to this screening direction or the attachments, please do not hesitate to contact [REDACTED] on [REDACTED] or email the Environmental Management Team at [opred@energysecurity.gov.uk](mailto:opred@energysecurity.gov.uk).

Yours faithfully

[REDACTED]



**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 PL2759 (Victory Hot Tap Tee HTT1-2)**

**PL/2554/1 (Version 2)**

Whereas TOTALENERGIES E&P UK LIMITED has made an application dated 6th June 2025, under The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020, and whereas the Secretary of State has considered the application and is satisfied that the project is not likely to have a significant effect on the environment; in exercise of the powers available under regulation 6, the Secretary of State hereby directs that the application for consent in respect of the project need not be accompanied by an Environmental Impact Assessment, provided that the project is carried out as described in the application for the screening direction and in accordance with the conditions specified in the attached schedule.

In giving a screening direction under regulation 6 of the above Regulations, the Secretary of State accordingly gives agreement to the Oil and Gas Authority to the grant of consent for the project as detailed in the application, PA/5550.

Effective Date: 10th June 2025

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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 1 May 2025 until 31 December 2025.

#### **2 Commencement and completion of the project**

The holder of the screening direction must confirm the dates of commencement and completion of the project covered by the screening direction. Notification should be sent by email to the Environmental Management Team Mailbox: [opred@energysecurity.gov.uk](mailto:opred@energysecurity.gov.uk)

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

##### **Rock deposits**

15000 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**

0.25 tonnes of grout contained within 25 kilogramme capacity non-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).

##### **Rock Gabions deposits**

10 tonnes of rock gabions. The quantity of rock gabions deposited should be the minimum required to provide the necessary stabilisation or protection, and any surplus rock must be returned to land).

##### **Grout Gabions deposits**

10 tonnes of grout gabions. The quantity of grout gabions deposited should be the minimum required to provide the necessary stabilisation or protection, and any surplus rock must be returned to land).

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

Within an area bounded by the coordinates (WGS84 DATUM):

60 DEGREES 50 MINUTES 04.00 SECONDS NORTH

01 DEGREES 48 MINUTES 44.00 SECONDS WEST

AND

60 DEGREES 49 MINUTES 57.00 SECONDS NORTH

01 DEGREES 04 MINUTES 40.00 SECONDS WEST

## **5 Prevention of pollution**

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

## **6 Inspections**

Should the Department consider it necessary or expedient for an inspector appointed by the Secretary of State to investigate whether the conditions of the screening direction are being complied with, the holder of the screening direction shall afford the inspector with such facilities and assistance as the inspector considers necessary to exercise the powers conferred by the regulations. The holder of the screening direction shall additionally ensure that copies (electronic or paper) of the screening direction and any other relevant documents are available for inspection by the inspector at:

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

## **7 Monitoring**

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

## **8 Check monitoring**

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



undertake the work.

## **9 Atmospheric emissions returns**

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

## **10 Deposit returns**

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

## **11 Unauthorised deposits**

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

## **12 Screening direction variation**

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

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## COMMENTS ON THE APPLICATION FOR SCREENING DIRECTION

### Section 1

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

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

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

The Department has no comments at this time.

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

[opred@energysecurity.gov.uk](mailto:opred@energysecurity.gov.uk)

or

Offshore Petroleum Regulator for Environment & Decommissioning  
Department for Energy Security & Net Zero  
AB1 Building  
Crimon Place  
Aberdeen  
AB10 1BJ

Tel [REDACTED]





## **SCHEDULE OF SCREENING DIRECTION DECISION REASONS**

The Secretary of State has decided that, based on the information provided, the project is not likely to have a significant effect on the environment. The main reasons for this decision are:

### **1) Decision reasons**

The following provides a summary of the assessments undertaken 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 Assessment 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 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 the project**

The installation of a hot-tap tee (HTT) and protective structure onto the existing 18" production flowline PL2759 to allow produced fluids from the Victory field to flow to the Shetland Gas Plant by:

- Dredging and concrete removal at the installation point on PL2759 to allow access.
- Temporary deposit of this dredged material and concrete on the seabed;
- Temporary deposit of sand gabions to mark position of clump weights.
- Temporary deposit of clump weights to allow installation of the HTT by sky hook assembly
- Installation of a pipe support clamp
- Installation of the HTT and associated spools and valves.
- The re-instatement of all dredged material from heaps as backfill following installation of the HTT.
- Carrying out a barrier and leak test to confirm successful installation.
- The deposit of grout bags to secure PL2759 prior to installation of the protective structure.
- Installation of an over-trawlable protective structure over the HTT.
- Deposit of rock gabions and grout gabions at the base of the protective structure.

- Deposit of rock as protective material on each side of the HTT on PL2759
- Temporary deposit of work baskets.
- The removal of pipeline concrete material to the vessel.
- The removal of all temporary deposits.

## **Summary of the change to the project**

### **PL/2554/1**

The change to the project is to enable the wet-storage of the Hot-tap tee (HTT) protective structure within the 500m zone of the South PLEM for a period of 3 months prior to installation.

## **Description of project**

The HTT, protective structure and rock deposits will be carried out using a Diver Support Vessel (DSV), Construction Support Vessel (CSV) a rock installation vessel and a guard vessel. The operations will extend out with an existing 500m exclusion zone of the HTT due to the deposit of rock protection on PL2759 at each side of the HTT. The operation will involve the temporary deposit of dredged seabed material in two areas, including the temporary deposit of concrete removed from the pipeline. The temporary deposit of a dredger, work basket, HTT deployment basket, clump weights, sand gabion markers and the possible wet storage of the HTT protective structure is a total area of 0.00117km<sup>2</sup>. The dredged material will be used to backfill the dredged area, and all temporary deposits will be removed.

Prior to installation of the HTT, PL2759 will be protected using the permanent deposit of grout bags. The HTT will be installed and leak tested using a downline from the DSV prior to the installation of the gravity based protective structure. The structure is 25m x 21m and will be secured using rock gabions and grout gabions to build up a berm at each of the four legs. Up to 15,000 tonnes of rock will be deposited using a fall pipe from the rock placement vessel along PL2759, 500m at each side of the protective structure, a total of 1000m. The total area of permanent impact is 0.0076km<sup>2</sup>.

The operations are expected to take 40 days to complete, with the earliest start date of 1st of May 2025 and completed by 31st December 2025.

## **Location of project**

Having regard, in particular, to the matters identified in Schedule 5 2(a) to (c) of the Regulations, the environmental sensitivity of geographical areas likely to be affected by the project has been considered as follows.

The location of the project is West of Shetland, 31km offshore from Shetland in Block 207/01 in a water depth of 125m, 122km southeast of the UK/Faroe transboundary line.



Site-specific data has been collected over the main Victory site along the pipeline route of PL2759, including sites within 1km of the operational area. The survey identified three main habitat types in the region (identified here using the European Nature Information System (EUNIS) habitat classifications): offshore circalittoral coarse sediment (MD3), offshore circalittoral sand (MD5), and offshore circalittoral mixed sediment (MD4) which was observed at the station closest to the HTT installation with higher proportions of gravel, cobbles and boulders. The surveys identified the presence of numerous benthic species.

The works do not take place in any marine protected areas, the nearest is the Faroe Shetland Sponge Belt NCMPSA located 30km northwest. However, potential sensitive habitats and species are known to occur in the wider West of Shetland region, namely, sub-tidal reefs (e.g. biogenic reefs formed by *D. pertusum* and rocky reefs formed from iceberg scour or moraine deposits); Ocean Quahog (*Arctica islandica*); and Deep-sea Sponge Aggregations.

No evidence of biogenic reefs has been identified at the project location. The surveys identified areas of low to medium reef. As demosponges were recorded in the area an assessment using the Henry and Roberts methods was carried out. The closest potential aggregation was identified around 1.5km from the operations, however, the area showed low confidence that the feature can be considered a deep-sea sponge aggregation as defined by OSPAR.

It is acknowledged that Ocean Quahog has previously been recorded in the wider area, however no evidence of the presence has been recorded in the site-specific surveys undertaken.

The project is located within ICES International Council for the Exploration of the Sea (ICES) rectangle 50E8 in area of spawning and nursery grounds for several species of fish and interact with the timing of the proposed activities (May to December). Including a high intensity nursery area for Anglerfish, Blue Whiting and Mackerel. Several of the fish species that may be spawning and use the area as a nursery are also Priority Marine Features including Anglerfish, Blue Whiting, herring, cod, sandeels, ling, Norway put, saithe, with cod, spurdog, common skate, spotted ray also on the OSPAR list for threatened and/or declining species. However, the probability of presence of juvenile fish of these species is considered low in the operational area.

The proposed project is in an area which is important in terms of seabird populations with 2 SPA's within 40km at Ramna Stacks and Gruney SPA and Ronas Hill -North Roe and Tingon SPA. The project coincides with the breeding season for many seabirds and the end of breeding season where birds move offshore. Seabird sensitivity is high in October.

Atlantic white-sided dolphin, harbour porpoise, killer whale, long-finned pilot whale, minke whale and white-beaked dolphin have been recorded in the vicinity of the HTT installation location in moderate to low densities. All species are European protected species, and Scottish PMFs. With harbour porpoise as Annex II species of the

Habitats Directive.

The project area is a relatively well fished area and important to the fishing community and shipping activity is very low in the region. Overall, the area is well developed oil and gas region. The operation is in Block 207/1 which is marked as a concern to the Ministry of Defence because it is within training ranges requiring extended notification times, though the project itself does meet the requirements for extended notification. The project is in the National Marine Plan Area for Scotland.

Given the location of the project, the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) and (viii) of Schedule 5 are not likely to be affected by the project.

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

In accordance with paragraph 3 of Schedule 5 to the Regulations, the likely significant effects of the project on the environment have been considered. Potential effects 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 occur in the form of the temporary disturbance of an area of seabed (up to 0.00117km<sup>2</sup>), the permanent disturbance of an area of seabed (up to 0.0076km<sup>2</sup>). With a total disturbance of 0.0094km<sup>2</sup>. The disturbance of the seabed will result in the smothering and mortality of benthic fauna which will result in some short-term temporary impacts. None of the disturbance events are expected to cause significant impact to benthic receptors with a large area of similar seabed in the project area. The most risk is from direct impact resulting from the installation of deposits on the seabed with some smothering. It is expected that the benthic communities will regenerate in the area over time.

Fish, marine mammals and benthic species (which may be PMFs, Annex II species and EPSs) are not considered to be significantly impacted. Underwater noise from operations is considered to have a negligible impact on marine mammals and fish species as the majority of noise is of low frequency. Birds are not considered to be significantly impacted.

There are no expected transboundary effects from the operations.

Atmospheric emissions associated with the operation of the vessels for 40 days has been assessed with total emissions representing a small proportion of the total UK

Continental Shelf emissions. The emissions may result in a deterioration of the local air quality, but due to the relatively short duration of the work, and that the exposed conditions in the area will rapidly disperse the emissions, it is not anticipated that there will be a significant impact.



Navigational impacts due to the presence of vessels on station to do the works will have an impact of excluding fishing vessels for up to 40 days. The works are mostly within an established 500m exclusion zone, with a very small area of rock deposited outside this. All infrastructure is designed to be over-trawlable, and measures will be taken to reduce any potential snagging hazards for fishing activities. Therefore, the impacts are not considered significant.

The discharge of small amounts of offshore chemicals which has been risk assessed and the impacts determined to be negligible. The main risk of accidental release of hydrocarbons is resulting from a 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. All infrastructure/deposits will be lowered to the seabed and placed carefully into position during installation operations, minimising the risk of a dropped object on live infrastructure.

Cumulative impacts of the project with other activities have been assessed and is not considered significant.

The project is in accordance with the National Marine Plan for Scotland's objectives and policies.

### **Decision**

Taking the above considerations into account, the Secretary of State has concluded that the project is not likely to have a significant impact on the environment and that an environmental impact assessment is not required.

### **2) Mitigation of significant effects**

The following are features of the project or measures envisaged that the developer has proposed to avoid or prevent what might otherwise have been significant adverse effects on the environment:

Not Applicable.