



PERENCO GAS (UK) LIMITED



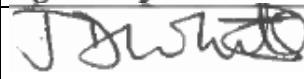
Pickerill Alpha and Pickerill Bravo Riser Sections Decommissioning Programmes

November 2025

Final Version

Document Control

Approvals

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Contents

1. EXECUTIVE SUMMARY	8
1.1 Decommissioning Programme	8
1.2 Requirement for Decommissioning Programme.....	8
1.3 Introduction.....	8
1.4 Overview of Pipelines Being Decommissioned	10
1.4.1 Pipelines.....	10
1.5 Summary of Proposed Decommissioning Programme.....	11
1.6 Field Location Including Field Layout and Adjacent Facilities	12
1.7 Industrial Implications	16
2. DESCRIPTION OF ITEMS TO BE DECOMMISSIONED	17
2.1 Pipelines Including Stabilisation Features	17
2.2 Inventory Estimates.....	18
3. REMOVAL AND DISPOSAL METHODS.....	18
3.1 Pipelines.....	19
3.2 Waste Streams.....	19
4. ENVIRONMENTAL APPRAISAL OVERVIEW.....	20
4.1 Environmental Sensitivities (Summary).....	20
4.2 Potential Environmental Impacts and Their Management	23
5. INTERESTED PARTY CONSULTATIONS	26
6. PROGRAMME MANAGEMENT.....	27
6.1 Project Management and Verification	27
6.2 Post-Decommissioning Debris Clearance and Seabed Clearance Verification.....	27
6.3 Schedule	27
6.4 Costs	29
6.5 Close Out	29
6.6 Post-Decommissioning Monitoring and Evaluation	29
7. SUPPORTING DOCUMENTS	30
8. SECTION 29 HOLDERS LETTERS OF SUPPORT	31
9. APPENDICES	38

Tables and Figures

Tables

Table 1.1: Pipelines Being Decommissioned	10
Table 1.2: Pipelines Section 29 Notice Holders Details (PL3121)	10
Table 1.3: Pipelines Section 29 Notice Holders Details (PLU3122).....	10
Table 1.4: Pipelines Section 29 Notice Holders Details (PL816, PL817, PL818 & PL819).....	10
Table 1.5: Summary of Decommissioning Programme.....	11
Table 1.6: Adjacent Facilities	14
Table 2.1: Pipeline/Umbilical Information	17
Table 3.1: Pipeline Decommissioning Options.....	19
Table 3.2: Waste Stream Management Methods.....	19
Table 3.3: Inventory Disposition	20
Table 4.1: Environmental Sensitivities	20
Table 4.2: Environmental Impact Management	24
Table 5.1: Summary of Stakeholder Comments	26
Table 7.1: Supporting Documents	30

Figures

Figure 1.1: Field Location in UKCS.....	12
Figure 1.2: Field Layout.....	13
Figure 1.3: Adjacent Facilities	15
Figure 2.1: Pie Chart of Estimated Inventory (Pipelines)	18
Figure 6.1: Gantt Chart of Project Plan	28

Appendices

Appendix A: Pickerill A risers	38
Appendix B: Pickerill B risers.....	38

Terms and Abbreviations

Abbreviation	Explanation
"	Inch
%	Percentage
AIS	Automatic Identification System
CA	Comparative Assessment
COP	Cessation of Production
DESNZ	Department for Energy Security and Net Zero
DP	Decommissioning Programme
EA	Environment Appraisal
EC	European Commission
EU	European Union
EUNIS	European Nature Information System
HSEx	Health and Safety Executive
ICES	International Council for the Exploration of the Seas
JNCC	Joint Nature Conservation Committee
km	Kilometre
km ²	Square Kilometre
LSA	Low Specific Activity
m	Metre
MARPOL	The International Convention for the Prevention of Pollution from Ships
MCA	Maritime and Coastguard Agency
MMO	Marine Management Organisation
MOD	Ministry Of Defence
N/A	Not Applicable
NFFO	National Federation of Fishermen's Organisations
NIFPO	Northern Ireland Fish Producers' Organisation
NORM	Naturally Occurring Radioactive Material
NSTA	North Sea Transition Authority (formerly Oil and Gas Authority)
NUI	Normally Unmanned Installation
OPEP	Oil Pollution Emergency Plan
OPRED	Offshore Petroleum Regulator for Environment & Decommissioning
Perenco	Perenco Gas (UK) Limited

Abbreviation	Explanation
PL	Pipeline
PLU	Umbilical Pipeline
PWA	Pipeline Works Authorisation
S29	Section 29 Notice Holder
SAC	Special Area of Conservation
SEMS	Safety and Environmental Management System
SFF	The Scottish Fishermen's Federation
SMRU	Sea Mammal Research Unit
SNS	Southern North Sea
SOPEP	Shipboard Oil Pollution Emergency Plan
SPCS	Subsea Production Control System
Te	Tonne
TGT	Theddlethorpe Gas Terminal
UKHO	UK Hydrographic Office
UK	United Kingdom
UKCS	United Kingdom Continental Shelf



1. EXECUTIVE SUMMARY

1.1 Decommissioning Programme

This document contains Decommissioning Programmes (DPs) for the pipelines and umbilical riser sections of PL3121, PLU3122, PL816, PL817, PL818 and PL819 attached to the Pickerill Alpha (A) & Pickerill Bravo (B) jackets in the Southern North Sea (SNS).

Perenco Gas (UK) Limited (Perenco) has prepared this DP on behalf of all Section 29 (S29) Notice Holders. The S29 notice holders' letters of support will be provided in Section 8 in the final approved revision of this document.

This DP does not include Pickerill A & B topsides and jackets removal. The Pickerill A & B Installation DP was approved by the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED) on 10th September 2019. The topsides were decommissioned in June 2020 (Pickerill A) and September 2020 (Pickerill B). At the time of the Installation DP, the S29 for the section of PL3121 & PLU3122 was overlooked, and now Perenco are correcting this oversight with this DP.

A separate decommissioning programme for the Pickerill Pipelines PL816, PL817, PL818 and PL819, except for the riser sections, will be covered under a separate pipeline DP. The decommissioning of PL3121 and PLU3122 is covered in the Juliet DP, published on 27th June 2019.

1.2 Requirement for Decommissioning Programme

Pipelines:

In accordance with the Petroleum Act 1998, the S29 notice holders of the Pickerill pipelines (see Tables 1.2, 1.3 and 1.4) are applying to OPRED to obtain approval for decommissioning the pipelines detailed in Section 2.1 of this programme. (See also Section 8 – Section 29 Notice Holders Letters of Support).

In conjunction with public, stakeholder and regulatory consultation, the decommissioning programme is submitted without derogation and in compliance with national and international regulations and OPRED guidelines. The schedule outlined in this document is for a 2-year decommissioning project plan due to begin in Q4 2025.

1.3 Introduction

The Pickerill gas field is located in the United Kingdom Continental Shelf (UKCS) Block 48/11 in the Southern North Sea, 65km offshore from the Theddlethorpe Gas Terminal (TGT). It was discovered by well 48/11b-4, drilled by Conoco (UK) Limited in 1984, and gas development commenced in 1992. The field was unitised in 1989 to resolve the ownership issues across the four blocks: 48/11a, 48/11b, 48/12c and 48/17f (within production licences P460, P37, P461 and P463). In 2003, the Pickerill field operatorship was handed over from Britoil Public Limited Company to Perenco UK Limited. In Q4 2017, operatorship was transferred to Perenco Gas (UK) Limited.

Perenco explored all avenues for continuing production as described in the Cessation of Production (COP) document and concluded that due to a reduction of gas production and closure of the Theddlethorpe Gas Terminal, continued operations are uneconomical. The COP documentation was submitted to the OGA, and approval was granted in July 2018.



The Pickerill Field comprised of two normally unmanned installations (NUI): Pickerill A (48/11B) and Pickerill B (44/11A). Pickerill A installation lies west of Pickerill B (see Figure 1.2). Their co-ordinates are:

- **Pickerill A:** Latitude: 53° 32' 59.81" N, Longitude: 01° 04' 37.99" E.
- **Pickerill B:** Latitude: 53° 31' 29.78" N, Longitude: 01° 09' 38.40" E.

Both installations are not situated within an environmentally sensitive area. They are located 24km northeast of the Inner Dowsing, Race Bank and North Ridge Special Area of Conservation (SAC).

The two NUI Jackets are connected via two pipelines: a 16" export gas pipeline (PL818) and a 3" Methanol pipeline (PL819). Pickerill A is connected to the TGT via the 24" gas export pipeline (PL816) and the 3" Methanol pipeline (PL817).

In August 2022, the pipelines at Pickerill A & B were cut and air-gapped on the seabed (-20.3m LAT for Pickerill A and -19.3m LAT for Pickerill B), and the sections of the pipelines were recovered to shore. There were separate cuts at the touch-down points on the respective 3" PL817 pipeline and 24" PL816 pipeline risers at the Pickerill A jacket and the 3" PL819 pipeline and 16" PL818 pipeline risers at the Pickerill B jacket. All the riser sections remain attached to the jackets.

The pipeline ends that have been cut will be a snagging hazard once the jacket is removed, but the 500m safety zones for Pickerill A and Pickerill B will remain in place until the Pipeline DP remedial work is completed, and a clear seabed certificate is issued.

The co-ordinates of the riser sections are:

- PL3121 and PLU3122, Pickerill A: 53° 32' 56.81" N, 01° 04' 32.74" E
- PL816 and PL817, Pickerill A: 53° 32' 57.08" N, 01° 04' 33.34" E
- PL818 and PL819, Pickerill A: 53° 32' 57.08" N, 01° 04' 33.34" E
- PL818 and PL819, Pickerill B: 53° 31' 26.96" N, 01° 09' 33.25" E

The Juliet subsea development, owned by Ithaca (NE) UKCS Limited, is located in Block 47/14B to the west of the Pickerill Field and comprises of two subsea wells tied into a subsea manifold, which is then connected to Pickerill A via a 12" pipeline (PL3121), 22km in length. Juliet gas was co-mingled with Pickerill gas at Pickerill A and then exported to TGT. The Juliet subsea wells were controlled from Pickerill A via a Subsea Production Control System (SPCS). This SPCS subsea equipment was located at the manifold/trees and connected via an umbilical to the associated topsides control equipment located on Pickerill A.

The request for COP for the Juliet Field was approved by OGA on 12th December 2018. The decommissioning of the Juliet Installation and Pipeline is covered under separate Juliet Field DPs, published on 27th June 2019.

The Juliet pipeline (PL3121) and umbilical (PLU3122) have been cut at near-seabed level at the base of the riser, outside the jacket and in proximity to the export riser flanged connections.

1.4 Overview of Pipelines Being Decommissioned

1.4.1 Pipelines

Table 1.1: Pipelines Being Decommissioned	
Number and total length (m) of Pipeline(s) / umbilical(s) (Full details given in Table 2.1)	8
	<ul style="list-style-type: none"> • PL3121* – 30.1m • PLU3122* – 30.1m • PL816* – 30.1m • PL817* – 40.7m • PL818* (Pickerill A) – 32.2m • PL818* (Pickerill B) – 31.7m • PL819* (Pickerill A) – 31.8m • PL819* (Pickerill B) – 30.6m

*Riser section remaining attached to jacket only

Table 1.2: Pipelines Section 29 Notice Holders Details (PL3121)		
Section 29 Notice Holders	Registration Number	Equity Interest (%)
Perenco Gas (UK) Limited	00715529	94.78
Ithaca MA Limited	03947050	5.22
Perenco UK Limited	04653066	0

Table 1.3: Pipelines Section 29 Notice Holders Details (PLU3122)		
Section 29 Notice Holders	Registration Number	Equity Interest (%)
Perenco Gas (UK) Limited	00715529	94.78
Ithaca MA Limited	03947050	5.22

Table 1.4: Pipelines Section 29 Notice Holders Details (PL816, PL817, PL818 & PL819)		
Section 29 Notice Holders	Registration Number	Equity Interest (%)
Perenco Gas (UK) Limited	00715529	94.78
Perenco UK Limited	04653066	0
Ithaca MA Limited	03947050	5.22
Petro-Canada Energy North Sea Limited (Suncor Energy)	03084447	0
BP Exploration Operating Company Limited	00305943	0

Table 1.4: Pipelines Section 29 Notice Holders Details (PL816, PL817, PL818 & PL819)		
Noble Energy (Oilex) Limited	00797339	0
Apache Beryl I Limited	BR001327	0
Arco British Limited, LLC	BR001713	0

1.5 Summary of Proposed Decommissioning Programme

Table 1.5: Summary of Decommissioning Programme	
Proposed Decommissioning Solution	Reason for Selection
Pipelines, Flowlines, Umbilicals & Riser Sections	
<p>PL3121, PLU3122, PL816, PL817, PL818 & PL819 riser sections are attached to the Pickerill A and B jackets and will be removed during the jacket removal campaign.</p> <p>The pipelines were cut and air-gapped on the seabed. The pipelines will be left open-ended, lying on the seabed, though not protruding at an angle. No additional mitigation is planned as part of the Risers DP as the pipelines are not connected to an operational system, and 500m Safety Zones remain in force.</p>	<p>The removed riser sections will be transported to shore to maximise recycling of materials to comply with OSPAR requirements.</p>
Interdependencies	
<p>PL3121 & PLU3122 are connected to the Juliet subsea development. The approved Juliet Field DP states this pipeline and umbilical will be left in situ and disconnected at both ends (where they exit the rock placement).</p>	

1.6 Field Location Including Field Layout and Adjacent Facilities

Figure 1.1: Field Location in UKCS



Figure 1.2: Field Layout

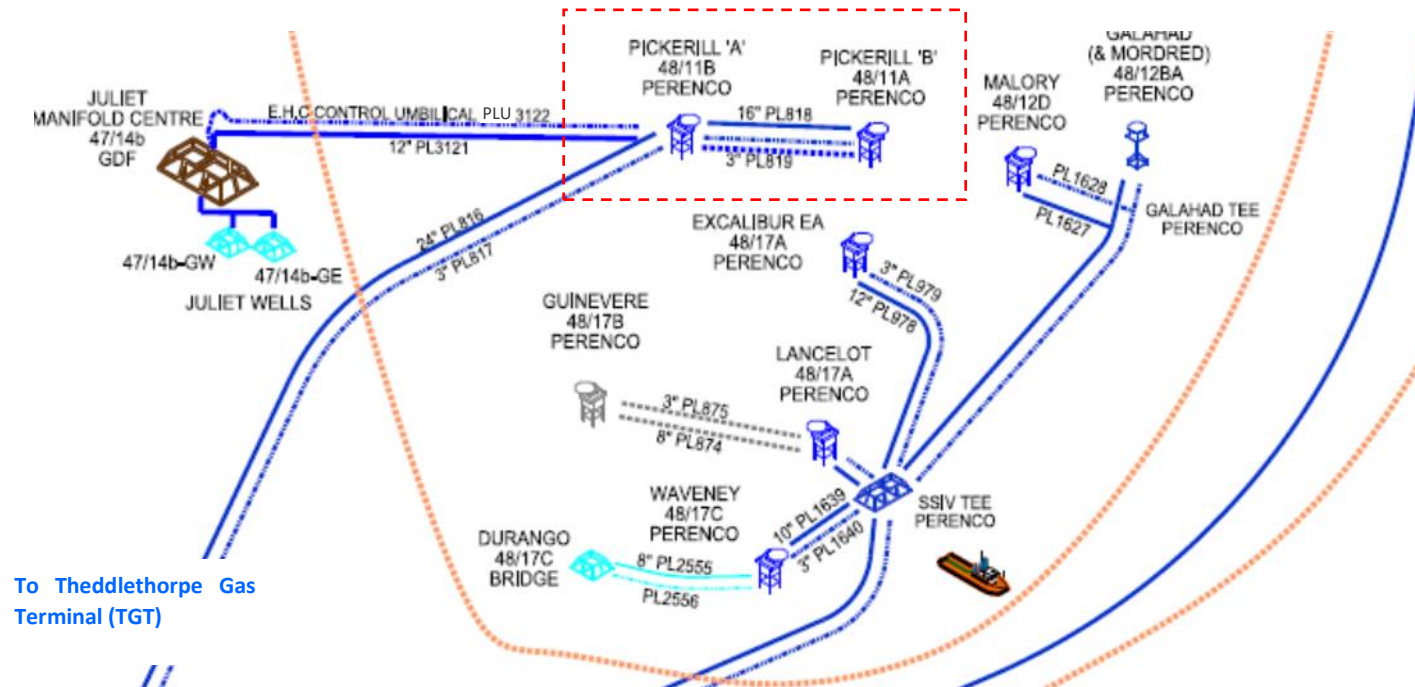
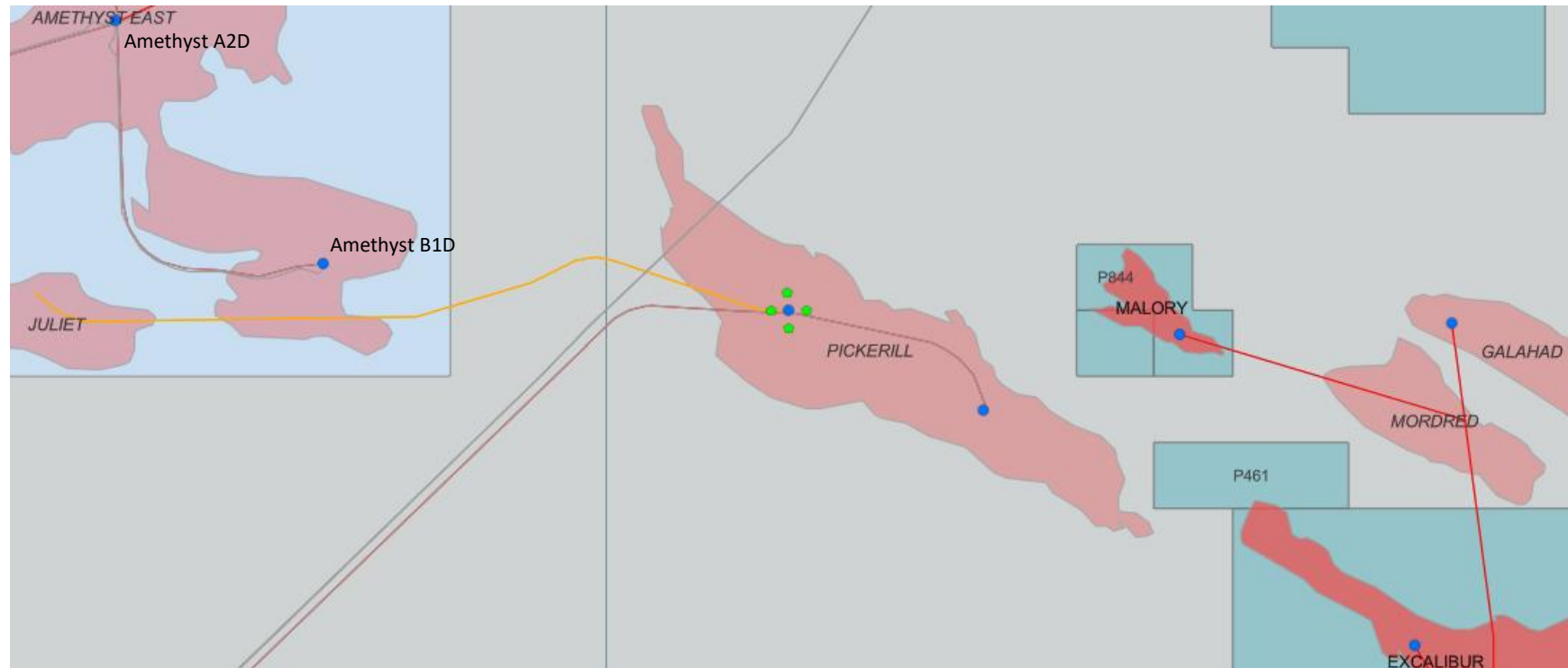


Table 1.6: Adjacent Facilities					
Owner/ Operator	Name	Type	Distance/Direction	Information	Status
Perenco Gas (UK) Limited	Excalibur	Platform	From Pickerill A – 20.1km southeast From Pickerill B – 13.9km southeast	Adjacent Platform	Operational
Perenco Gas (UK) Limited	Malory	Platform	From Pickerill A – 11.1km east. From Pickerill B – 5.9km northeast	Adjacent Platform	Operational
Perenco Gas (UK) Limited	Galahad	Platform	From Pickerill A – 18.8km east From Pickerill B – 13.5km east	Adjacent Platform	Out of use
Perenco UK Limited	Amethyst A2D	Platform	From Pickerill A – 20km northwest From Pickerill B – 26.9km northwest	Adjacent Platform	Out of use
Perenco UK Limited	Amethyst B1D	Platform	From Pickerill A – 13.2km west From Pickerill B – 19.1km west	Adjacent Platform	Out of use
Ithaca (NE) UKCS Limited	Juliet	Subsea development	From Pickerill A – 21.3km west From Pickerill B – 27.1km west	Subsea	Out of use
Impacts of Decommissioning Proposals					
The Juliet subsea wells are tied back to the Pickerill A jacket and are being decommissioned under the Juliet Field DP. The subsea pipelines PL3121 & PLU3122 were flushed and air-gapped in September 2019.					

Figure 1.3: Adjacent Facilities



Surface points	Pipelines linear
● PLATFORM	— Gas
● BUOY	— Other
	— Condensate, mixed hydrocarbon

1.7 Industrial Implications

Perenco's contract strategy and Supply Chain Action Plan will result in an efficient and cost-effective execution of the decommissioning works.

The Pickerill Installations and Riser Sections DPs are managed by Perenco to ensure the 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 employ best practices 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: Pipeline/Umbilical Information

Pipeline Number	Description (Include diameter)	Length (m)	Product Conveyed	From-To End Points	Burial Status	Pipeline Status	Current Content
PL3121*	Export line (12")	30.1	Gas	From and including Cut Point B to and including Pickerill A Jacket ESDV	Exposed	Out of use	Seawater
PLU3122*	Electro-hydraulic control and chemical injection umbilical (138mm)	30.1	Various (see Description)	From and including Pickerill A Jacket to and including Cut point A	Exposed	Out of use	Seawater
PL816*	Export line (24")	30.1	Gas	Pickerill 'A' (Gathering) Jacket Riser Deadweight Support at EL +8.500m – Cut location 1	Exposed	Out of use	Seawater
PL817*	Methanol line (3")	40.7	Methanol	Cut location 2 – Pickerill 'A' (Gathering) Jacket Riser Deadweight Support at EL +5.500m	Exposed	Out of use	Seawater
PL818*	Export line (16")	31.7	Gas	Pickerill 'B' Satellite Jacket 16" Riser Deadweight Support Clamp at EL5.560m – Cut location 1	Exposed	Out of use	Seawater
	Export line (16")	32.2	Gas	Cut location 4 – Pickerill 'A' Gathering Jacket 16" Riser Deadweight Support at EL5.560m	Exposed	Out of use	Seawater
PL819*	Methanol line (3")	31.8	Methanol	Pickerill 'A' Gathering Jacket 3" Riser Deadweight Support at EL 5.600m – Cut location 1	Exposed	Out of use	Seawater
	Methanol line (3")	30.6	Methanol	Cut location 4 – Pickerill 'B' Satellite Jacket 3" Riser Deadweight Support at EL 5.280m	Exposed	Out of use	Seawater

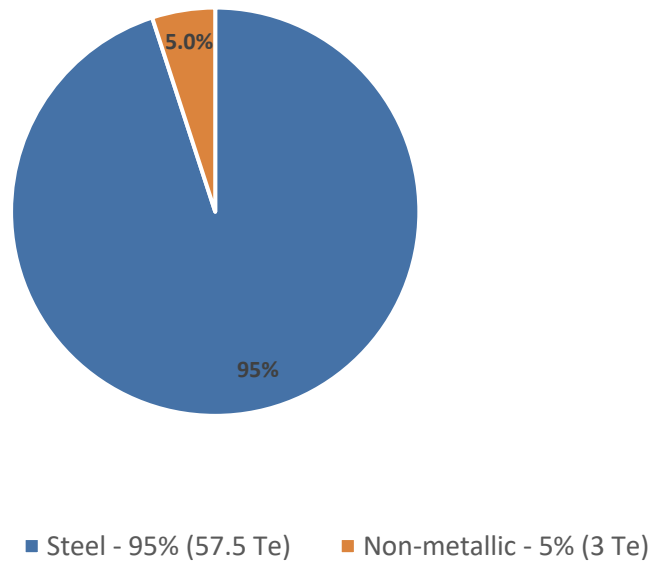
*Riser section remaining attached to jacket only. 14.9m of riser for PL3121 and 26.9m of riser for PLU3122 were removed during the topside removal campaign.

2.2 Inventory Estimates

Figure 2.1: Pie Chart of Estimated Inventory (Pipelines)

Estimated Inventory: Pipelines

Total Mass = 60.5 Te



3. REMOVAL AND DISPOSAL METHODS

Disposal option selection will be in accordance with the Environmental Agency Waste Management Hierarchy. Perenco will consider the disposal options available, considering the business needs within Perenco to reuse equipment and materials where appropriate.

These riser sections will be disposed of as part of the Pickerill A and B Jackets campaign. At the current time, a suitable relocation or reuse for the jacket and, therefore, the riser sections have not been identified. At present, dismantling of the jacket at an onshore disposal facility is considered the most likely disposal option. Those materials deemed suitable for recycling are to be recovered at an appropriate recycling facility. Once a site is known OPRED will be informed.

3.1 Pipelines

Decommissioning Options: A Comparative Assessment (CA) is not required as the risers will be fully removed, as detailed in Table 3.1:

Table 3.1: Pipeline Decommissioning Options			
Pipeline or Group (As per PWA)	Condition of Line/Group (Surface laid/trenched/ buried/spanning)	Whole or Part of Pipeline/Group	Decommissioning Options Considered
PL3121*	Attached to jacket, exposed	Whole of riser section	A CA is not required; the risers will be fully removed.
PLU3122*	Attached to jacket, exposed	Whole of riser section	
PL816*	Attached to jacket, exposed	Whole of riser section	
PL817*	Attached to jacket, exposed	Whole of riser section	
PL818* (Pickerill B)	Attached to jacket, exposed	Whole of riser section	
PL818* (Pickerill A)	Attached to jacket, exposed	Whole of riser section	
PL819* (Pickerill A)	Attached to jacket, exposed	Whole of riser section	
PL819* (Pickerill B)	Attached to jacket, exposed	Whole of riser section	

*Riser section only

3.2 Waste Streams

Table 3.2: Waste Stream Management Methods	
Waste Stream	Removal and Disposal Method
Bulk liquids	N/A
Marine growth	Removed offshore/onshore. Disposed of according to guidelines.
NORM/LSA Scale	The pipelines were made HCS, and no NORM was detected when the risers were cut. Therefore, no NORM/LSA waste is expected. If NORM is detected, it will be disposed of according to guidelines and company policies.
Other hazardous wastes	The pipelines were made HCS; due to this, a survey for hazardous waste will not be required for this decommissioning activity.
Onshore Dismantling Sites	Appropriate licensed sites will be selected. The dismantling site must demonstrate a proven disposal track record and waste stream management throughout the deconstruction process, and demonstrate their ability to deliver re-use and recycling options. If an onshore site is required, DESNZ will be contacted.

Table 3.3: Inventory Disposition			
	Total Inventory Tonnage	Planned tonnage to shore	Planned left in situ
Pipelines	60.5	60.5	0

4. ENVIRONMENTAL APPRAISAL OVERVIEW

Environmental sensitivities are described in Table 4.1.

4.1 Environmental Sensitivities (Summary)

Table 4.1: Environmental Sensitivities	
Environmental Receptor	Main Features
Conservation Interests	<p>Inner Dowsing, Race Bank and North Ridge SAC The Pickerill A and Pickerill B installations are both located 24km northeast of the Inner Dowsing, Race Bank and North Ridge SAC. The sandbanks typically have fields of sand waves associated with them. The Annex I biogenic reef habitats formed by <i>Sabellaria spinulosa</i> are also present in the SAC.</p> <p>North Norfolk Sandbanks and Saturn Reef SAC The Pickerill A & B installations are located 35km and 32km respectively, southwest of the North Norfolk Sandbanks and Saturn Reef SAC. The sandbanks typically have fields of sand waves associated with them. The Annex I biogenic reef habitats formed by <i>S. spinulosa</i> are also present in the SAC.</p>
Seabed	<p>Seabed sediments The EUNIS habitats data [Ref 1] indicates that the seabed surrounding the Pickerill infrastructure has an EUNIS classification of A5.1, described as “Sublittoral coarse sediment (unstable cobbles and pebbles, gravels and coarse sands)” [Ref 2]. There are no reefs in the immediate vicinity of the Jackets.</p> <p>Benthic Fauna The Pickerill B benthic survey results show that the Pickerill survey area was highly species abundant, with a total of 7515 individuals identified. Of the 198 species recorded, 168 species were infaunal and were dominated by annelids, accounting for 45.81% of the community. The samples were also considered to be epifaunal rich, with a combined grouping of colonial and solitary epifauna accounting for 33 species, of which bryozoan were the most well represented with 16 taxa observed. There appeared to be no distinct impact on community structure or clear geographical distribution from the Pickerill B infrastructure.</p> <p>Benthic fauna was characteristic for this region of the SNS. No EC Habitats Directive Annex I habitats or other protected habitats/ species were encountered during the survey. While sporadic individuals of <i>Sabellaria spinulosa</i> were evident from macrofaunal analysis of grab samples, no <i>Sabellaria</i> aggregations were evident on video footage or bathymetry data, and as such, there is no evidence for the potential presence of qualifying <i>Sabellaria</i> reef structures within the survey area.</p>

Table 4.1: Environmental Sensitivities

Fish	The Pickerill field is located in International Council for the Exploration of the Sea (ICES) rectangle 36F1, in an area of spawning and nursery grounds for several commercially important species, including anglerfish, Cod, Herring, mackerel, sole, Nephrops, plaice, Sandeels, Sprat, Spurdog, and Whiting. Spawning areas for most species are not rigidly fixed, and fish may spawn either earlier or later from year to year.
Fisheries	The Pickerill installations are located within the International Council for the Exploration of the Sea (ICES) Rectangle 36F1. Landings associated with both ICES Rectangle 36F1 are dominated by shellfish species. Shellfish are predominantly targeted in this region by static fishing gear, such as pots and traps. Species targeted include crabs, whelks, Nephrops and lobsters. Some demersal beam trawling targeting demersal finfish and flatfish takes place in the area; however, this is a minor contributor to the total value of the commercial fisheries which utilise the region. Fisheries landings in the Pickerill Field are low compared to other regions of the UK.
Marine Mammals	<p>Harbour porpoise, white-beaked dolphin, and white sided-dolphin have all been recorded near UCKS Block 48/11, wherein the Pickerill field lies [Ref 3]. Harbour porpoises are observed throughout the year in the SNS and were sighted near the Pickerill Field during February and from June to October in low to moderate numbers. White-beaked dolphins were observed with less frequency, with low numbers recorded during January and October, whilst white-sided dolphins were only observed in August in very low numbers. Due to the mobile nature of the species, they are likely to move away and not be adversely affected by the proposed Pickerill decommissioning activities.</p> <p>Since the Pickerill installations are located approximately 59km offshore, grey and harbour seals may be encountered from time to time, but it is not likely that they use the area with any regularity or in great numbers. This is confirmed by the grey and harbour seal density maps published by the Sea Mammal Research Unit (SMRU), which are provided in the NMPI (2018). The maps report the presence of grey seals between 1 and 50 per 25km² within the vicinity of the Pickerill A Jacket, and less than 1 per 25km² within the vicinity of the Pickerill B Jacket [Ref 4].</p>
Birds	<p>According to the density maps [Ref 5], the following species have been recorded within the area of the Pickerill Jackets A and B during the proposed period of operations: Northern fulmar, Sooty/Manx Sear water, Storm petrel, Northern Gannet, Cormorant, Shag, Pomarine/Arctic/Long-tailed/Great Skua, guillemot, razorbill, puffin, little auk; as well as numerous species of gull, and tern.</p> <p>In general, species can be found breeding at low densities from March to November, predominantly during the summer months (June, July, and August). Seabird sensitivity in the region of UKCS Block 48/11 and in the vicinity of the Pickerill installations are considered overall medium (score of 3) between August and March. The seabird sensitivity can be considered low from May till July (score of 5). The decommissioning projects of the Pickerill Jackets A and B are located approximately 58km from the nearest UK coast and are remote from sensitive seabird breeding areas on the coast.</p> <p>The 2023 and 2024 Ornithological Assessments have shown Kittiwakes nesting on Pickerill A & B Jackets, therefore, the removal of the riser sections with the jacket campaign is planned for outside the nesting season.</p>

Table 4.1: Environmental Sensitivities

Onshore Communities	All waste produced from the Pickerill decommissioning activities will be transported to an onshore recovery/disposal facility. Perenco will ensure the chosen site(s) comply with all relevant permitting and legislative requirements. No onshore communities are expected to be affected by the decommissioning programme.
Other Users of the Sea	<p>Shipping Shipping activity in the project area ranges from very low to high. Automatic Identification System (AIS) satellite vessel data for 2017-2018 [Ref 6], focusing primarily on a six-month period comprising August – October 2017 and January – March 2018, indicates that there are a wide range of vessel types operating within 10NM.</p> <p>Offshore Wind Farms The Triton Knoll Offshore Wind Farm is 12km from Pickerill A. An Offshore Wind Leasing Round 4 project, announced in February 2021, is set to be located in the vicinity of the Pickerill field.</p> <p>Dredging and aggregate extractions The closest aggregate production area is 4.5km from Pickerill B.</p> <p>Military Activity The Pickerill infrastructure is located in Block 48/11 and as such, it is not located within an MOD Danger and Exercise Area.</p> <p>Wrecks There are no designated historical wrecks recorded in the immediate vicinity of the Pickerill decommissioning project.</p> <p>Telecommunications There are three cabled areas that are within the vicinity of the Pickerill installations: - Dudgeon extension (26 - 31km southeast); - Race Bank Array (approximately 30km southwest); and - Triton Knoll (11.5 – 15km west).</p>
Atmosphere	Local atmospheric emissions will be influenced by vessel movements and associated activities during the proposed decommissioning operations. It is expected that these emissions will be localised to the area of interest.

4.2 Potential Environmental Impacts and Their Management

Environmental Impact Assessment Summary:

The Pickerill A & B Installations Decommissioning Programme (Removal Phase) Environmental Appraisal [Ref 7] (the EA) provides a review of the key features of the environment in the Pickerill Decommissioning Programme Removal Phase. A key consideration when planning and finalising the decommissioning of the Pickerill installations is a clear understanding of the surrounding environment. To understand the potential for the project to interact with the environment so that appropriate controls can be adopted to mitigate negative impacts, the physical, biological, and socio-economic environments will be assessed.

Overview:

The potential environmental impacts associated with the proposed decommissioning activities have been assessed as part of the EA, which will accompany the Pickerill A & B Installations DP. The EA assesses potential environmental impacts by identifying interactions between the proposed decommissioning activities and the associated environmental receptors. It also describes the proposed mitigation measures designed to avoid or reduce the identified potential environmental impacts and how these will be managed in accordance with the Perenco Safety and Environmental Management System (SEMS) while considering responses from stakeholders.

As required by the Petroleum Act, 1998 and OSPAR Decision 98/3, Perenco has undertaken an environmental and societal risk assessment to identify and rank the potential hazards due to the Pickerill installation decommissioning activities. The risk assessment concluded that, post-mitigation, there is one 'high' risk decommissioning activity and several 'medium' risks. These risks are:

- Seabed impacts;
- Accidental Events;
- Risk to other users of the sea.

Following further assessment, and implementation of additional control and mitigation measures, the level of impact from these aspects was reduced to 'low' and therefore not significant. These control and mitigation measures are an essential component of the decommissioning project Environmental Management Plan (Table 4.2 below).

Table 4.2: Environmental Impact Management

Activity	Main Impacts	Management
Jacket removal (including removal of riser sections)	Atmospheric emissions	<ul style="list-style-type: none"> Vessels will be audited as part of the selection and pre-mobilisation. Work programmes will be planned to optimise vessel time in the field. All generators and engines will be maintained and operated to the manufacturers' standards to ensure maximum efficiency. Fuel consumption will be minimised by operational practices and power management systems for engines, generators and other combustion plan and maintenance systems. Vessels will use ultra-low sulphur fuel in line with MARPOL requirements. All mitigation measures will be incorporated into the contractual documents of subcontractors.
	Underwater noise	<ul style="list-style-type: none"> Machinery and equipment will be in good working order and well-maintained. The number of vessels utilising dynamic positioning will be minimised. Perenco will minimise risk to marine mammals from underwater noise throughout operations in-line with industry guidance.
	Seabed impacts	<ul style="list-style-type: none"> Cutting and lifting operations of subsea equipment will be controlled, and any impact on seabed sediment will be minimised. Internal cutting will be used preferentially where access is available to avoid interaction with the sediment adjacent to the Pickerill installations. The requirements for excavation will be assessed on a case-by-case basis to minimise the area of excavation. All anchors (where they are used) will be completely removed from the seabed following decommissioning operations. Vessel orientation will be reviewed and selected to minimise the requirements for rock placement whilst allowing for the safe locating of the accommodation work vessel and access, i.e., crane reach to undertake essential scopes of work. Site specific assessment will be completed to assess suitable locations. Post-removal surveys of the seabed will be carried out to identify significant anomalies and dropped objects.
	Discharges to sea	<ul style="list-style-type: none"> Cutting and lifting operations will be controlled and managed to ensure accurate placement of cutting and lifting equipment and minimise any impact on seabed sediment, which may lead to the release of contaminated sediment via sediment resuspension. Any vessel-related discharges will be managed in line with MARPOL requirements.
	Other users of the sea	<ul style="list-style-type: none"> Cutting and lifting operations will occur within the Pickerill Jacket 500m exclusion zone. Perenco have undertaken a site-specific shipping assessment before the Pickerill decommissioning operations. Before the commencement of operations, the appropriate notifications will be made, and maritime notices posted. All vessel activities will be in accordance with national and international regulations.

		<ul style="list-style-type: none"> • Appropriate navigation aids will be used in accordance with the consent to locate conditions to ensure other users of the sea are made aware of the presence of vessels. • The number of vessels standing by at Pickerill will be kept to a minimum. • A mandatory 500m safety zone will remain around the Pickerill infrastructures during the decommissioning activities. • On-going consultation with fisheries representatives. • Post-decommissioning seabed clearance.
	Damage or loss of fishing gear	<ul style="list-style-type: none"> • Overtrawl survey (or equivalent) to be completed after removal of infrastructure. • Materials left in situ will be mapped, the UK Hydrographic Office (UKHO) and Kingfisher will be informed and legacy management/survey requirements to the agreed with OPRED.
	Solid waste	<ul style="list-style-type: none"> • Licensed contractors will be used at licensed sites for all waste-related management. • An AWMP will be developed and put into place before the decommissioning activities commence. This plan will ensure that individual waste streams are appropriately managed, staff / crew are aware of waste management requirements and waste storage, transfer and final disposal / recovery is compliant with relevant legislation. • Opportunities where materials destined for landfill can be reduced, or otherwise recycled or reused, will be actively sought out.
	Accidental spills	<ul style="list-style-type: none"> • The Oil Pollution Emergency Plan (OPEP) has been produced in accordance with the Merchant Shipping (Oil Pollution Preparedness, Response & Co-operation Convention) Regulations 1998 and the Offshore Installations (Emergency Pollution Control) Regulations 2002. This OPEP will be updated in line with operational stages as required throughout the preparation and decommissioning lifecycle. • Perenco has specialist oil spill response services provided by OSRL and are members of the OPOL. • Any spill originating from the Heavy Lift vessel during the removal operations will be controlled under the installation OPEP. Any accidental spill to sea out-with the 500m safety zone will be managed by individual vessel Shipboard Oil Pollution Emergency Plans (SOPEP). • Perenco will conduct all operations in a controlled manner with trained personnel using suitable equipment. All vessels will have suitable spill containment kits, and an efficient spill response process is in place. • Perenco routinely swap out perishable equipment such as hoses, and a management programme is implemented to ensure their integrity. • Before the transfer of materials, visual checks and pre-bunkering checklists are undertaken by trained personnel in communication with the standby vessel. • Observed leaks are reported and dealt with immediately by competent personnel and reported to the appropriate authorities.
	Dropped object(s)	<ul style="list-style-type: none"> • Adhere to lifting and handling procedures and use of certified equipment for lifting. • Items recovered will be secured in a banded area to ensure that any spills containing residual hydrocarbon traces are captured, preventing loss to sea. • Post-decommissioning surveys will be undertaken to assess the presence and potential recoverability of any lost objects.

5. INTERESTED PARTY CONSULTATIONS

Table 5.1: Summary of Stakeholder Comments		
Who	Comment	Response
Statutory Consultations		
National Federation of Fishermen's Organisations (NFFO)	No response received.	N/A
Scottish Fishermen's Federation (SFF)	Considering the proximity of the projects, the SFF were content for the NFFO to comment on the draft DP documents.	Perenco has consulted with the NFFO.
Northern Ireland Fish Producers' Organisation	No response received.	N/A
Global Marine Systems	Global Marine Systems reviewed the content provided and noted there are no active telecom cables in the vicinity (the closest is over 100km away). There were no further comments.	N/A
North Sea Transition Authority	N/A	Perenco has consulted with NSTA under S29(2A) of the Petroleum Act.
Public		
	OPRED advised it was not necessary to go to public consultation for this DP.	N/A
Informal Stakeholder Consultations		
OPRED Offshore Environmental Inspectorate (OEI)	There were no comments with regard to OEI EOC review. It was noted that all relevant pipelines and risers have been flushed and are seawater filled, therefore environmental risk from pipeline inventories are minimal.	N/A
HSEx	No response received.	N/A
Environment Agency	The Environment Agency responded with guidance regarding storage and treatment of waste.	Perenco notes the guidance provided.
UK Hydrographic Office (UKHO)	The UKHO responded with guidance regarding offshore activity notifications.	Perenco notes the guidance provided.
Maritime and Coastguard Agency (MCA)	The MCA responded with guidance regarding maritime safety.	Perenco notes the guidance provided.
Marine Management Organisation (MMO)	The MMO responded with guidance regarding marine licensing and planning.	Perenco notes the guidance provided.

6. PROGRAMME MANAGEMENT

6.1 Project Management and Verification

A Perenco 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 Perenco Policies and Principles.

Perenco's standard procedures for operational control and hazard identification and management will be used. Where possible the work will be coordinated with other decommissioning operations in the SNS. Perenco will monitor and track the process of consent and the consultations required as part of this process.

6.2 Post-Decommissioning Debris Clearance and Seabed Clearance Verification

Before the commencement of all physical decommissioning activities as proposed in this DP, a pre-decommissioning survey was completed within the Pickerill A and B 500m safety zones and along their pipelines. This survey included: a bathymetry survey, to identify any free spans, exposures, or large objects (which may present a snagging hazard), and an Environmental Baseline Survey (EBS) and Habitat Assessment Survey (HAS).

Following the completion of the activities detailed in this DP, a post-decommissioning survey will be completed, and a summary comparison of pre-and post-environmental survey results will be provided as part of the Close Out report. The post-decommissioning as-left survey will cover the pipeline ends.

A clear seabed certificate will be obtained following the Pipeline DP, as required under the Decommissioning Debris Surveys and Recovery and Seabed Clearance Verification guidance by OPRED and NFFO.

The cut pipeline ends will be a snagging hazard once the jacket is removed; however, Perenco requested extensions to the 500m Safety Zones for the installations in September 2019. The Order came into force on 17th April 2020.

This 500m safety zone order will remain in place until the pipelines are fully decommissioned, which will be detailed in the Pickerill Pipeline DP.

Any objects dropped during the removal preparations will be notified to OPRED via the PON2 process. Their subsequent recovery will be reported via the PON2 and DP Progress Reporting processes.

6.3 Schedule

Figure 6.1 provides the timeline of all decommissioning activities concerning this DP and activities up to close out.

Figure 6.1: Gantt Chart of Project Plan

	2025				2026				2027			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Dismantling - Pickerill A												
Dismantlement Interval Phase												
Jacket and Riser Removal												
Site clearance												
Dismantling - Pickerill B												
Dismantlement Interval Phase												
Jacket and Riser Removal												
Site clearance												
Pickerill A & B												
Post-Decommissioning Survey												
Close Out Report												

Legend



Earliest date task could be completed



Period in which task is expected to be completed



6.4 Costs

The decommissioning costs detailed within this DP have been provided to OPRED as part of the Pickerill Installations DP.

6.5 Close Out

In accordance with the OPRED Guidelines, a Close Out report will be submitted to OPRED (normally within 12 months of the completion of the offshore decommissioning scope). The Close Out Report will explain any variations from the Decommissioning Programme and will also include the debris removal and the first post-decommissioning environmental survey.

6.6 Post-Decommissioning Monitoring and Evaluation

Post-decommissioning environmental seabed surveys will be carried out around the 500m Safety Zone of the Pickerill installations. The surveys will focus on chemical and physical disturbances of the decommissioning area and will be compared with the pre-decommissioning surveys, which will have been carried out before decommissioning commences. Results of this survey will be forwarded to OPRED.

Perenco will commit to survey the pipeline ends within five years of the installation removals or when the pre-decommissioning surveys for the Pipeline DP are undertaken – whichever comes first.

7. SUPPORTING DOCUMENTS

Table 7.1: Supporting Documents	
Document Number	Title
1	JNCC (2018). UKSeaMap 2018. A broad-scale seabed habitat map for the UK. Available online at http://jncc.defra.gov.uk/ukseamap [Accessed 02/11/2018].
2	Oil and Gas Authority (2017). Quadrant Maps. Open Data Site. Available online at http://data.ogauthority.opendata.arcgis.com/datasets?q=Q&sort_by=relevance
3	Reid, J., Evans, P. & Northridge, S., (2003). An atlas of cetacean distribution on the northwest European Continental Shelf, Joint Nature Conservation Committee: Peterborough.
4	Jones , E. L., McConnell, B. J., Smout, S. C., Hammond, P. S., Duck, C. D., Morris, C., Thompson, D., Russell, D.J.F., Vincent, C., Cronin, M., Sharples, R. J. & Matthiopoulos, J. (2015), ' Patterns of space use in sympatric marine colonial predators reveals scales of spatial partitioning ' Marine Ecology Progress Series , vol 534 , pp. 235-249 . DOI: 10.3354/meps11370. Available online at https://research-repository.st-andrews.ac.uk/bitstream/handle/10023/9386/Jones_2015_MEPS_Patterns_AM.pdf?sequence=1&isAllowed=y
5	Kober, K., Webb, A., Win, I., Lewis, M., O'Brien, S., Wilson, J. L., Ried, B. J., (2010). An analysis of the numbers and distribution of seabirds within the British Fishery Limit aimed at identifying areas that qualify as possible marine SPAs. ISSN; 0963-8091. JNCC report No.431.
6	Anatec, 2018. Navigational Risk Assessment – Pickerill Jackets Decommissioning. Anatec Limited. Document Reference A4125-PER-NRA-1. September 2018.
7	Pickerill Alpha (A) & Bravo (B) Installations Decommissioning Programme (Removal Phase) Environmental Appraisal
8	Biocensus (2023). Perenco Assets Ornithological Assessment 2023. RSK Biocensus, UK.
9	Xodus (2024). Perenco: Ornithological Support Perenco Asset Survey 2024. Xodus, Aberdeen, UK.

8. SECTION 29 HOLDERS LETTERS OF SUPPORT



5th November 2025

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

Dear Sir or Madam,

PICKERILL RISERS SECTIONS DECOMMISSIONING PROGRAMMES PETROLEUM ACT 1998

We acknowledge receipt of your letter dated 27th October 2025.

We, Ithaca MA Limited confirm that we authorise Perenco Gas (UK) Limited to submit on our behalf abandonment programmes relating to the Pickerill Risers Sections facilities as directed by the Secretary of State on 27 October 2025.

We confirm that we support the proposals detailed in the Pickerill Risers Sections Decommissioning Programmes dated 04 November, which is to be submitted by Perenco Gas (UK) 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,



David Dunn
Decommissioning Manager, Ithaca MA Limited
For and on behalf of Ithaca MA Limited



E&P – East Coast Canada
130-140 Kelsey Drive, Suite 200
St. John's, NL
Canada A1B 0T2
Tel 709 778 3500
www.suncor.com

Section 29 Notice Holder Letter of Support

Offshore Petroleum Regulator for Environment and Decommissioning

AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

05 November 2025

Dear Sir or Madam

PICKERILL RISERS SECTIONS DECOMMISSIONING PROGRAMMES PETROLEUM
ACT 1998

We acknowledge receipt of your letter dated 27 October 2025.

We, Petro-Canada Energy North Sea Limited confirm that we authorise Perenco Gas (UK) Limited to submit on our behalf abandonment programmes relating to the Pickerill Risers Sections facilities as directed by the Secretary of State on 27 October 2025.

We confirm that we support the proposals detailed in the Pickerill Risers Sections Decommissioning Programmes dated 04 November, which is to be submitted by Perenco Gas (UK) 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,

Glen Burke
Director, E&P Commercial & BD
For and on behalf of **Petro-Canada Energy North Sea Limited**



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Mathew Duncan

Snr Finance & Commercial Advisor
Finance P&O – North Sea



Arco British Limited, LLC
1-4 Wellheads Avenue
Dyce
Aberdeen
AB21 7PB

Mobile: 07766475212
Main: 01224 832000
duncanme@bp.com

12 November 2025

Offshore Petroleum Regulator for Environment and Decommissioning
AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Dear Sir/Madam

**SECTION 29 NOTICE HOLDER LETTER OF SUPPORT
PICKERILL RISERS SECTIONS DECOMMISSIONING PROGRAMMES PETROLEUM ACT 1998**

We acknowledge receipt of your letter dated 27 October 2025.

We, Arco British Limited, LLC confirm that we authorise Perenco Gas (UK) Limited to submit on our behalf abandonment programmes relating to the Pickerill Risers Sections facilities as directed by the Secretary of State on 27 October 2025.

We confirm that we support the proposals detailed in the Pickerill Risers Sections Decommissioning Programmes dated 04 November, which is to be submitted by Perenco Gas (UK) 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,

Signed by:

0352012154044E6
Mathew Duncan
Senior Finance & Commercial Advisor
For and on behalf of Arco British Limited, LLC



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Mathew Duncan
Snr Finance & Commercial Advisor
Finance P&O – North Sea



BP Exploration Operating Company Ltd
1-4 Wellheads Avenue
Dyce
Aberdeen
AB21 7PB

Mobile: 07766475212
Main: 01224 832000
duncanme@bp.com

12 November 2025

Offshore Petroleum Regulator for Environment and Decommissioning
AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Dear Sir/Madam

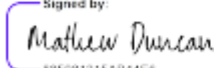
SECTION 29 NOTICE HOLDER LETTER OF SUPPORT
PICKERILL RISERS SECTIONS DECOMMISSIONING PROGRAMMES PETROLEUM ACT 1998

We acknowledge receipt of your letter dated 27 October 2025.

We, BP Exploration Operating Company Limited confirm that we authorise Perenco Gas (UK) Limited to submit on our behalf abandonment programmes relating to the Pickerill Risers Sections facilities as directed by the Secretary of State on 27 October 2025.

We confirm that we support the proposals detailed in the Pickerill Risers Sections Decommissioning Programmes dated 04 November, which is to be submitted by Perenco Gas (UK) 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,

Signed by:

885C81215A044E6...
Mathew Duncan
Senior Finance & Commercial Advisor
For and on behalf of BP Exploration Operating Company Ltd



Offshore Petroleum Regulator for Environment and Decommissioning
AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

17 November 2025

Dear Sir or Madam

PICKERILL RISERS SECTIONS DECOMMISSIONING PROGRAMMES PETROLEUM ACT 1998

We acknowledge receipt of your letter dated 27 October 2025.

We, Apache Beryl I Limited confirm that we authorise Perenco Gas (UK) Limited to submit on our behalf abandonment programmes relating to the Pickerill Risers Sections facilities as directed by the Secretary of State on 27 October 2025.

We confirm that we support the proposals detailed in the Pickerill Risers Sections Decommissioning Programmes dated 04 November, which is to be submitted by Perenco Gas (UK) 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,



Amanda George
Senior Commercial Manager

For and on behalf of Apache Beryl I Limited

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Noble Energy (Oilex) Limited
2 Marischal Square, Floor 3
Broad Street
Aberdeen AB10 1BL

12 November 2025

Offshore Petroleum Regulator for Environment and Decommissioning
AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Dear Sir or Madam

PICKERILL RISERS SECTIONS DECOMMISSIONING PROGRAMMES PETROLEUM ACT 1998

We acknowledge receipt of your letter dated 27 October 2025.

We, Noble Energy (Oilex) Limited confirm that we authorise Perenco Gas (UK) Limited to submit on our behalf abandonment programmes relating to the Pickerill Risers Sections facilities as directed by the Secretary of State on 27 October 2025.

We confirm that we support the proposals detailed in the Pickerill Risers Sections Decommissioning Programmes dated 04 November, which is to be submitted by Perenco Gas (UK) 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,

Claire Pearson

Name Claire Pearson
Position in Company Director
For and on behalf of Noble Energy (Oilex) Limited

Noble Energy (Oilex) Limited
Registered in England and Wales
Registration No 00797339
Registered Address: 1 Westferry Circus, Canary Wharf, London, United Kingdom, E14 4HA



Section 29 Notice Holder Letter of Support

Offshore Petroleum Regulator for Environment and Decommissioning
AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

05 November 2025

Dear Sir or Madam

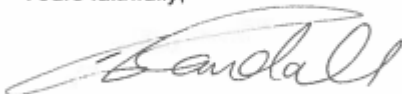
PICKERILL RISERS SECTIONS DECOMMISSIONING PROGRAMMES
PETROLEUM ACT 1998

We acknowledge receipt of your letter dated 27 October 2025.

We, Perenco UK Limited confirm that we authorise Perenco Gas (UK) Limited to submit on our behalf abandonment programmes relating to the Pickerill Risers Sections facilities as directed by the Secretary of State on 27 October 2025.

We confirm that we support the proposals detailed in the Pickerill Risers Sections Decommissioning Programmes dated 04 November, which is to be submitted by Perenco Gas (UK) 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,



Emma Randall
Finance Manager

For and on behalf of **Perenco UK Limited**

9. APPENDICES

Appendix A: Pickerill A risers



Appendix B: Pickerill B risers

